COMISIÓN DE ENERGÍA DE PUERTO RICO
Recibido por: Auril III MAN
Fecha: 21114 Hora: 134

<u>AFFIDAVIT</u>

I, Ralph Zarumba, being first duly sworn, state as follows:

- 1. I am a Director with Navigant Consulting, Inc. I am an adult and, if called as a witness, I could testify competently as to the subject matter of this Affidavit
- 2. I have reviewed PREPA's 2nd filing in response to the Puerto Rico Energy Commission's June 13th Resolution and Order on filing completeness. In particular, I have reviewed the portions relating to Schedules H-5, J-3, J-4, J-5, L-1, L-2, M-2, N-1 and PREPA Ex. 4.0. I was involved in preparing these portions of the response.
- 3. I understand that the Puerto Rico Energy Commission has requested that PREPA provide an explanation for its derivation of the proposed fixed charge in Schedule L-1. This charge was derived in the same manner as the approach used for PREPA's original proposed Transition Charge. PREPA's total outstanding debt service, not including the transition portion of \$314,389,739 was allocated to all tariffs based on kWh sales. However, for residential customers, the \$0.01875/kWh charge was converted to a fixed charge of \$7.10 per customer per month.

4.	The information included herein and in the response relating to the above Schedules is
	true on the basis of my personal knowledge or on the basis of the information supplied to
	me by my colleagues at Navigant and by employees of PREPA.

In Churago, Of this 30 day of June, 2016.

Ralph Zarumba

Sworn and subscribed before me by Kalph Zauma of the personal circumstances above mentioned, whom I personally know, in Chickey, 21, this 30 day of June, 2016.

Notary Public

JAYNE F. FREW
OFFICIAL SEAL
Notary Public, State of Illinols
My Commission Expires
May 15, 2017

COMMONWEALTH OF PUERTO RICO PUERTO RICO ENERGY COMMISSION

IN RE: THE PUERTO RICO ELECTRIC :

NO.: CEPR-AP-2015-0001

POWER AUTHORITY

:

INITIAL RATE REVIEW

SECOND CORRECTED AND UPDATED INDEX

No.	No. Document				
PETITION					
	Verified Petition for Approval of (1) "Permanent" Rates and (2)	N/A			
	Temporary Rates				
	Verification	N/A			
	Index	N/A			
ATTACHMENT	A - DIRECT TESTIMONY AND EXHIBITS (PERMANENT RAT	TES)			
PREPA Ex. 1.0	Direct Testimony of Javier Quintana	N/A			
	Attestation	N/A			
PREPA Ex. 1.01	Resume/CV of Javier Quintana	N/A			
PREPA Ex. 1.02	Certification by PREPA's CFO	N/A			
PREPA Ex. 2.0	Direct Testimony of Lisa Donahue	N/A			
	Attestation	N/A			
PREPA Ex. 2.01	Resume/CV of Lisa Donahue	N/A			
PREPA Ex. 3.0	Direct Testimony of Sonia Miranda, Antonio Perez Sales, and	N/A			
	Virgilio Sosa				
	Attestations	N/A			
PREPA Ex. 3.01	Business Plan	N/A			
PREPA Ex. 3.02	Business Plan (Updated)	N/A			
PREPA Ex. 3.03	Resume/CV of Antonio Perez Sales	N/A			
PREPA Ex. 3.04	Resume/CV of Virgilio Sosa				
PREPA Ex. 4.0	Direct Testimony of Ralph Zarumba and Eugene Granovsky	N/A			
	Attestations	N/A			
PREPA Ex. 4.01	Resume/CV of Ralph Zarumba	N/A			
PREPA Ex. 4.02	Resume/CV of Eugene Granovsky	N/A			
PREPA Ex. 4.03	Comparison of estimated revenues to be received from the gross-up of the FCA and the PPCA and the actual costs of CILT and other subsidies for FY 2017	N/A			
PREPA Ex. 5.0	Direct Testimony of Dan Stathos, Frank Pampush, and Lucas Porter	N/A			
	Attestations	N/A			
PREPA Ex. 5.01	Resume/CV of Frank Pampush	N/A			
PREPA Ex. 5.02	Resume/CV of Lucas Porter	N/A			
PREPA Ex. 5.03	Resume/CV of Dan Stathos	N/A			
PREPA Ex. 5.04	PREPA Revenue Requirements – Known and Measurable Changes	N/A			
PREPA Ex. 5.05	Revenue Requirements Approach Results – Restructuring Scenario	N/A			
PREPA Ex. 5.06	Modified Cash Basis Debt Service Coverage Ratio	N/A			
PREPA Ex. 5.07	PREPA Rate Base Components	N/A			
PREPA Ex. 5.08	U.S. Regulated Utility Authorized Rate of Return 2010-2015	N/A			
PREPA Ex. 5.09	Puerto Rico General Obligation Bonds Market Yield to Maturity	N/A			
PREPA Ex. 5.10	U.S. Regulated Utility Authorized Cost of Debt 2010-2015	N/A			
PREPA Ex. 5.11	PREPA Bonds Market Value Yield to Maturity	N/A			
PREPA Ex. 5.12	Revenue Requirement by Scenarios	N/A			

No.	Document	Bates Sequence
PREPA Ex. 5.13	Overall Rate by Scenario	N/A
PREPA Ex. 5.14	Debt Service Coverage Ratio by Scenario	N/A
PREPA Ex. 5.15	Equity Balance by Scenario	N/A
PREPA Ex. 5.16	Access to Capital Markets Metrics	N/A
PREPA Ex. 5.17	U.S. Corporate Bond Yield Spreads over U.S. Treasury Bonds by	N/A
	Ratings Class	
PREPA Ex. 5.18	Default Rates by Rating Class (Investment Grade v. Speculative	N/A
	Grade)	
PREPA Ex. 5.19	Summary of Key Credit Metric Results for PREPA's Potential	N/A
	Improved Credit Rating and Re-admittance to the Credit Markets	
	(Based on an Analysis of Fitch Ratings 2015 Study of 85 Public	
	Power Utilities 2010-2014)	
PREPA Ex. 5.20	Number of Public Power Authorities by Ratings Category (Based on	N/A
	Fitch 2015 Public Power Peer Study 2010-2014)	
PREPA Ex. 5.21	Credit Metrics in the 2015 Fitch Ratings Public Power Study	N/A
PREPA Ex. 5.22	Credit Metrics Not Used in This Analysis	N/A
PREPA Ex. 5.23	Credit Metric Averages and Medians by Ratings Class (Fitch 2015	N/A
	Public Power Peer Study)	
PREPA Ex. 5.24	Correlation Matrix of 2015 Fitch Ratings Public Power Credit	N/A
	Metrics (2010-2014)	
PREPA Ex. 5.25	Basic Structure of a Classification Tree	N/A
PREPA Ex. 5.26	Identification of Key Metrics based on Classification Tree Analysis	N/A
DDED LE SOE	for Two Scenarios	27/
PREPA Ex. 5.27	Predictions on the 425 Observation Dataset based on the Scenario 1	N/A
DDED A E 5 20	Classification Tree	27/4
PREPA Ex. 5.28	Probability Density of Debt Service Coverage Ratio by Debt Rating	N/A
PREPA Ex. 5.29	(Fitch 2015 Public Power Peer Study 2010-2014)	N/A
FREFA Ex. 3.29	Debt Service Coverage Ratio v. Days Liquidity by Debt Rating (Fitch 2015 Public Power Peer Study 2010-2014)	IN/A
PREPA Ex. 5.30	Debt Service Coverage Ratio v. Coverage of Full Obligations by	N/A
TREIT Ex. 5.50	Debt Rating (Fitch Public Power Peer Study 2010-2014)	14/24
PREPA Ex. 5.31	Full Dataset of 425 Observations Plotted in Terms of the Top 3	N/A
1101112/110101	Classification Metrics (Based on 1,000 Iterations Using 85 Random	1771
	Observations per Iteration)	
PREPA Ex. 5.32	Predictions on the 425 Observation Dataset based on the Scenario 2	N/A
	Classification Tree	
PREPA Ex. 5.33	Test of Statistical Significance (95% Confidence)	N/A
PREPA Ex. 5.34	Measures of Diagnostic Accuracy for the Classification Tree	N/A
	(Scenario 1)	
PREPA Ex. 5.35	R statistical code used in analysis	N/A
PREPA Ex. 6.0	Direct Testimony of Lawrence Kaufmann	N/A
	Attestation	N/A
PREPA Ex. 6.01	Resume/CV of Lawrence Kaufmann	N/A
PREPA Ex. 6.02	Sample Vertically-Integrated U.S. Electric Utilities	N/A
PREPA Ex. 7.0	Direct Testimony of Ross Hemphill	N/A
DDED 4 7 7 6	Attestation	N/A
PREPA Ex. 7.01	Resume/CV of Ross Hemphill	N/A
PREPA Ex. 7.02	EEI Report: "Alternative Regulation for Evolving Utility	N/A
DDEDA Ev. 7.02	Challenges: An Update Survey"	N/A
PREPA Ex. 7.03 PREPA Ex. 7.04	FRM template for updating rates during the interim years Example of Billing Determinant Schedule	N/A N/A
PREPA Ex. 7.04 PREPA Ex. 8.0	Direct Testimony of Ralph Zarumba and Eugene Granovsky	N/A N/A
TREEA EA. 0.0	Attestations	N/A N/A
	Attestations	11/1

No.	Document	Bates Sequence
PREPA Ex. 8.01	Tariff Names and Descriptions	N/A
PREPA Ex. 8.02	Functionalization Method	N/A
PREPA Ex. 8.03	Functionalization Labor Ratio	N/A
PREPA Ex. 8.04	Functionalization Gross Plant Ratio	N/A
PREPA Ex. 8.05	Functionalization of Maintenance and Investment Capex	N/A
PREPA Ex. 8.06	Bad Debt Assignment	N/A
PREPA Ex. 8.07	Functionalized Revenue Requirements	N/A
PREPA Ex. 8.08	Classification Method	N/A
PREPA Ex. 8.09	Purchased Power Classification Factor	N/A
PREPA Ex. 8.10	Classification Gross Plant Ratios	N/A
PREPA Ex. 8.11	Classification Labor Ratio	N/A
PREPA Ex. 8.12	Classification Gross Plant Ratios (with General Plant)	N/A
PREPA Ex. 8.13	Classification of Maintenance and Investment Capex	N/A
PREPA Ex. 8.14	Classified Revenue Requirements	N/A
PREPA Ex. 9.0	Direct Testimony of Ralph Zarumba	N/A
	Attestation	N/A
PREPA Ex. 9.01	Resume/CV of Ralph Zarumba	N/A
PREPA Ex. 9.02	Distribution Investments	N/A
PREPA Ex. 9.03	Transmission Investments	N/A
PREPA Ex. 9.04	Marginal Cost of Service Study Results	N/A
	B - DIRECT TESTIMONY AND EXHIBITS (TEMPORARY RAT	
PREPA Ex. 10.0	Direct Testimony of Lisa Donahue	N/A
1 REI 71 Ex. 10.0	Attestation	N/A
PREPA Ex. 11.0	Direct Testimony of Dan Stathos	N/A
I KLI A LA. 11.0	Attestation	N/A
PREPA Ex. 12.0	Direct Testimony of Ralph Zarumba	N/A
I KLI A LA. 12.0	Attestation	N/A
ATTACHMENT	C - SCHEDULES	IWA
A. Summary Sch		
A-1 REV.	Computation of Increase in Gross Revenue Requirement	A 000008
A-1 KEV. A-2	Summary Results of Operations	A 000008
A-3	Summary Results of Operations Summary of Debt Service Requirements	A 000002 A 000003
A-4 REV.	Construction Expenditures and Gross Utility Plant in Service	A 000003
A-4 REV. A-5 REV.	Summary Financial Position and Changes	
		A 000010 - A 000011
A-6 REV.	Charges and Costs Included Under "Fuel Adjustment" and "Energy Purchase Adjustment"	A 000012 – A 000014
B. Rate Base and	Plant Investment	1
B-1	Summary of Test Year Original Cost Rate Base Elements	B 000001
B-2	Original Cost rate base Pro forma Adjustments	B 000002
2	(one column per adjustment)	2 000002
B-2 REV.	Workpapers	B 000005
B-3	Computation of Working Capital Requirements	B 000004
C. Test Year Inco		1 = 00000.
C-1	Adjusted Test Year Income Statement	C 000001
C-2 REV.	Income Statement Pro forma Adjustments	C 000005
C-2 KL V.	(one column per adjustment)	C 000003
	(one commit per adjustment)	
C-2	Workpapers	C 000003

No.	Document	Bates Sequence				
D. Cost of Capita	l and Debt Service Requirements					
D-1	Summary Cost of Capital and Debt Service Requirements including	D 000001 – D 000002				
	description and explanation of the "fixed charge on the rate"					
	required by Sec. 6B(b).					
D-2 REV.	Itemized Listing of Long Term Debt and Related Interest and Debt	D 000009 – C 000022				
	Service Requirements Itemized Listing of Short Term Debt and Related Interest and Debt					
D-3		D 000004				
D 1	Service Requirements Conital Lesses and Payment Requirements					
D-4	Capital Leases and Payment Requirements	D 000005 D 000006				
D-5						
Itemized List of Debt Securitized Through the Securitization Process		D 000007 – D 000008				
E Einanaial State	Set Forth in the PREPA Revitalization Act ments and Statistical Schedules					
E. Financiai State	Comparative Balance Sheets	E 000001				
E-1 E-2	Comparative Income Statements	E 000001				
E-3	Comparative Statement of Changes in Financial Position	E 000002				
E-3 E-4	Statement of Changes in Owners' Equity	E 000003				
E-5 CORR.	Detail of Utility Plant	E 000004				
E-6	Comparative Departmental/Functional Operating Income Statements	E 000118				
E-7 REV.	Operating Statistics	E 000000				
E-7 REV. E-8 REV.	Contributions in Lieu of Taxes	E 000119 E 000120 – E 000124				
E-9	Notes to Financial Statements	E 000020 - E 000124				
F. Projections and		E 000007 - E 000117				
F-1	Projected Income Statements – Present and Proposed Rates	F 000001 – F 000004				
F-2	Projected Charges in Financial Position and Debt Service Coverage	F 000005 – F 000008				
11-2	- Present and Proposed Rates	1 000003 -1 000008				
F-3 REV.	Projected Construction Requirements	F 000023 – F 000037				
F-4	Assumptions Used in Developing Projections	F 000015 – F 000022				
	Study and Rate Design	1 000010 1 000022				
G-1	Fully Allocated Embedded Cost of Service Summary –	G 000001				
	Present Rates (CONFIDENTIAL)					
G-2	Fully Allocated Embedded Cost of Service Summary – Proposed	G 000002				
_	Rates (CONFIDENTIAL)					
G-3	Allocation of Revenue Requirement to Classes of Service	G 000003				
G-4	Allocation of Expenses to Classes of Service (CONFIDENTIAL)	G 000004				
G-5	Development of Allocation Factors (CONFIDENTIAL)	G 000005				
G-6	Alternative Cost of Service Methodologies (CONFIDENTIAL)	G 000006				
	sed Tariff Schedules					
H-1	Summary of Revenues by Customer Classification –	H 000001 – H 000003				
	Present and Proposed Rates					
H-2	Analysis of Revenue Requirement by Detailed Class of Service –	H 000004 – H 000025				
	Present and Proposed Rates By Each Class of Service					
H-3	Changing in Representative Rate Schedules	H 000004 – H 000025				
	By Each Class of Service					
H-4	Customer Bill Impact Analysis	H 000026 – H 000053				
H-5 SUPP.	Bill Count – Bill Frequency Analysis	H 000056 – H 000074				
H-6	Proof of Revenue	H 000054 – H 000055				
I. Required Repor		T				
I-1	Consulting Engineers' Report for Fiscal Year that is Being Used as	I 000001 – I 00132				
	the Historic Test Year	7.000100 7.0005				
I-2	Audited Financial Statements for the Fiscal year that is Being Used	I 000133 – I 000275				
	as the Historic Tests Year					

No.	Document	Bates Sequence
I-3	Chief Restructuring Officers' Reports to PREPA Board	I 000276 – I 001330
	(CONFIDENTIAL)	
I-4	Business Plan	I 001331 – I 001381
J. Tariffs		
J-1	Proposed Tariffs	J 000001 – J 000064
J-2	Current Tariffs with Proposed Changes Shown in Legal Redline	J 000065 - J 000221
J-3 REV.	Plan of Administration for Each Surcharge or Rider	J 000225 - J 000234
J-4 REV.	Draft Energy Efficiency Tariff Rider	J 000235 - J 000236
J-5 REV.	Draft Tariff for a Decoupling Mechanism	J 000237 - J 000238
K. Information		-
K-1	A description of the function of the companies operating within	K 000001 - K 000002
	PREPA Holdings, including (but not limited to): PREPA Networks,	
	LLC (also known as PREPA.Net), InterAmerican Energy Sources,	
	LLC, and Consolidated Telecom of Puerto Rico, LLC. A list of the	No.
	officers and directors/board members of each of these companies if	
	different from the officers or board members of PREPA.	
L. Information	on Fixed Charge and Subsidies and Incentives and Optional Addition	al Information
L-1 SUPP.	A proposed fixed charge showing the amount customers shall pay on	L 000003
	account of PREPA's obligations to bondholders, which would	Annual Annual Property Services
	guarantee the annual payment of PREPA's obligations to	
	bondholders	
L-2 SUPP.	A description of any "subsidy or incentive related to electric power	L 000004 - L 000005
L-2 5011.	service," and the effects of such subsidy or incentive on the rates	
	paid by nonsubsidized customers. (See Sec. 22 of Act 83, as	
	amended by Sec. 2.10 of Act 57.)	
M. Ontional Pr	oposals and Required Information if PREPA's Filing Includes such P	roposals
M-1	Traditional Rate Design proposals will be shown on	M 000001
	Schedule M-1 (CONFIDENTIAL)	
M-2 SUPP.	Alternative Rate Design proposals, such as increased fixed charges,	M 000004
2 5011.	will be shown on Schedule M-2. Bill impact analysis of alternative	
	rate design proposals for increased fixed charges will be shown,	
	along with impacts of traditional rate design (required), for	
	comparative purposes, on Schedule H-4 (CONFIDENTIAL)	
M-3	Any Other Rate Design Proposal PREPA Wishes the Commission to	M 000003
5	Consider (CONFIDENTIAL)	
N. Ontional For	mula Rate Plan Proposal and Required Information if PREPA's Filin	ng Includes such a
Proposal		8
N-1 REV.	(Optional) Formula Rate Plan proposals, if any are being made, will	N 000002 – N 000003
N-1 REV.	(Optional) Formula Rate Plan proposals, if any are being made, will be shown on Schedule N-1 (CONFIDENTIAL)	N 000002 – N 000003
	be shown on Schedule N-1 (CONFIDENTIAL)	N 000002 – N 000003
ATTACHMEN	be shown on Schedule N-1 (CONFIDENTIAL) T D – WORKPAPERS	
ATTACHMEN PREPA Ex. 4.0	be shown on Schedule N-1 (CONFIDENTIAL) T D – WORKPAPERS Workpaper 1 – Billing Determinants	N/A
ATTACHMEN PREPA Ex. 4.0 PREPA Ex. 4.0	be shown on Schedule N-1 (CONFIDENTIAL) T D - WORKPAPERS Workpaper 1 - Billing Determinants Workpaper 2 - PREPA Rate Design (CONFIDENTIAL)	N/A N/A
ATTACHMEN' PREPA Ex. 4.0 PREPA Ex. 4.0 PREPA Ex. 5.0	be shown on Schedule N-1 (CONFIDENTIAL) T D - WORKPAPERS Workpaper 1 - Billing Determinants Workpaper 2 - PREPA Rate Design (CONFIDENTIAL) Workpaper 1 - Fitch Public Power Yearbook (CONFIDENTIAL)	N/A N/A N/A
ATTACHMEN' PREPA Ex. 4.0 PREPA Ex. 4.0 PREPA Ex. 5.0 PREPA Ex. 5.0	be shown on Schedule N-1 (CONFIDENTIAL) T D - WORKPAPERS Workpaper 1 - Billing Determinants Workpaper 2 - PREPA Rate Design (CONFIDENTIAL) Workpaper 1 - Fitch Public Power Yearbook (CONFIDENTIAL) Workpaper 2 - FitchReportR (CONFIDENTIAL)	N/A N/A N/A N/A
ATTACHMEN' PREPA Ex. 4.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 5.0	be shown on Schedule N-1 (CONFIDENTIAL) T D - WORKPAPERS Workpaper 1 - Billing Determinants Workpaper 2 - PREPA Rate Design (CONFIDENTIAL) Workpaper 1 - Fitch Public Power Yearbook (CONFIDENTIAL) Workpaper 2 - FitchReportR (CONFIDENTIAL) Workpaper 3 - PREPA Ex. 5.17-5.34	N/A N/A N/A N/A N/A
ATTACHMEN' PREPA Ex. 4.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 6.0	be shown on Schedule N-1 (CONFIDENTIAL) T D - WORKPAPERS Workpaper 1 - Billing Determinants Workpaper 2 - PREPA Rate Design (CONFIDENTIAL) Workpaper 1 - Fitch Public Power Yearbook (CONFIDENTIAL) Workpaper 2 - FitchReportR (CONFIDENTIAL) Workpaper 3 - PREPA Ex. 5.17-5.34 Workpaper 1 - Natsector M2014	N/A N/A N/A N/A N/A N/A
ATTACHMEN' PREPA Ex. 4.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 6.0 PREPA Ex. 6.0	be shown on Schedule N-1 (CONFIDENTIAL) T D - WORKPAPERS Workpaper 1 - Billing Determinants Workpaper 2 - PREPA Rate Design (CONFIDENTIAL) Workpaper 1 - Fitch Public Power Yearbook (CONFIDENTIAL) Workpaper 2 - FitchReportR (CONFIDENTIAL) Workpaper 3 - PREPA Ex. 5.17-5.34 Workpaper 1 - Natsector M2014 Workpaper 2 - PREPA Engineer Salaries Data	N/A N/A N/A N/A N/A N/A N/A
ATTACHMEN' PREPA Ex. 4.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 6.0 PREPA Ex. 6.0 PREPA Ex. 6.0	be shown on Schedule N-1 (CONFIDENTIAL) T D - WORKPAPERS Workpaper 1 - Billing Determinants Workpaper 2 - PREPA Rate Design (CONFIDENTIAL) Workpaper 1 - Fitch Public Power Yearbook (CONFIDENTIAL) Workpaper 2 - FitchReportR (CONFIDENTIAL) Workpaper 3 - PREPA Ex. 5.17-5.34 Workpaper 1 - Natsector M2014 Workpaper 2 - PREPA Engineer Salaries Data Workpaper 3 - PREPA Monthly Data 0715	N/A N/A N/A N/A N/A N/A N/A N/A
ATTACHMEN' PREPA Ex. 4.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 6.0	be shown on Schedule N-1 (CONFIDENTIAL) T D - WORKPAPERS Workpaper 1 - Billing Determinants Workpaper 2 - PREPA Rate Design (CONFIDENTIAL) Workpaper 1 - Fitch Public Power Yearbook (CONFIDENTIAL) Workpaper 2 - FitchReportR (CONFIDENTIAL) Workpaper 3 - PREPA Ex. 5.17-5.34 Workpaper 1 - Natsector M2014 Workpaper 2 - PREPA Engineer Salaries Data Workpaper 3 - PREPA Monthly Data 0715 Workpaper 4 - PREPA RawData 052215	N/A N/A N/A N/A N/A N/A N/A N/A N/A
ATTACHMEN' PREPA Ex. 4.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 6.0	be shown on Schedule N-1 (CONFIDENTIAL) T D - WORKPAPERS Workpaper 1 - Billing Determinants Workpaper 2 - PREPA Rate Design (CONFIDENTIAL) Workpaper 1 - Fitch Public Power Yearbook (CONFIDENTIAL) Workpaper 2 - FitchReportR (CONFIDENTIAL) Workpaper 3 - PREPA Ex. 5.17-5.34 Workpaper 1 - Natsector M2014 Workpaper 2 - PREPA Engineer Salaries Data Workpaper 3 - PREPA Monthly Data 0715 Workpaper 4 - PREPA RawData 052215 Workpaper 5 - IEEE Salary Survey 2013 (CONFIDENTIAL)	N/A N/A N/A N/A N/A N/A N/A N/A N/A N/A
N-1 REV. ATTACHMEN' PREPA Ex. 4.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 5.0 PREPA Ex. 6.0	be shown on Schedule N-1 (CONFIDENTIAL) T D - WORKPAPERS Workpaper 1 - Billing Determinants Workpaper 2 - PREPA Rate Design (CONFIDENTIAL) Workpaper 1 - Fitch Public Power Yearbook (CONFIDENTIAL) Workpaper 2 - FitchReportR (CONFIDENTIAL) Workpaper 3 - PREPA Ex. 5.17-5.34 Workpaper 1 - Natsector M2014 Workpaper 2 - PREPA Engineer Salaries Data Workpaper 3 - PREPA Monthly Data 0715 Workpaper 4 - PREPA RawData 052215	N/A N/A N/A N/A N/A N/A N/A N/A N/A

No.	Document	Bates Sequence
ATTACHMEN	ΓE – DRAFT PUBLIC NOTICE	
Attachment E	Draft Public Notice – PREPA Submits Formal Application for	N/A
	Review of Rates	
ATTACHMEN	ΓF – DRAFT PROCEDURAL SCHEDULE	
Attachment F	Draft PREPA Rate Review Procedural Schedule	N/A
ATTACHMEN	G – CROSS REFERENCE OF TESTIMONIES	
Attachment G	Cross Reference of Testifying Witnesses with Schedules and	N/A
	Exhibits Supported	

COMMONWEALTH OF PUERTO RICO PUERTO RICO ENERGY COMMISSION

IN RE: REVIEW OF RATES OF THE PUERTO RICO ELECTRIC POWER AUTHORITY

NO. CEPR-AP-2015-0001

SUBJECT: DOCUMENT PRODUCTION LOG FOR CERTAIN DOCUMENTS SUBMITTED WITH PREPA'S 2nd SUBMISSION OF MATERIAL IN COMPLIANCE WITH THE COMMISSION'S RESOLUTION AND ORDER OF JUNE 13, 2016

PREPA'S SUBMISSION OF DOCUMENT PRODUCTION LOG FOR CERTAIN DOCUMENTS SUBMITTED WITH PREPA'S 2nd SUBMISSION OF MATERIAL IN COMPLIANCE WITH THE COMMISSION'S RESOLUTION AND ORDER OF JUNE 13, 2016

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") and submits the following Document Production Log for Certain Documents Submitted with PREPA's 2nd Submission of Material in Compliance with the Commission's Resolution and Order of June 13, 2016.

Document Production Log for Certain Confidential Documents

Schedule (Tab)	Document File Name	Summary of Content	Author	Recipient	Date	PDF Bates Sequence	Confidentiality Designation/Basis
Schedule H-5 SUPP ("TOU-P")	Schedule H-5 SUPP CONF (TOU-P and	These documents supplement	Navigant	PREPA	6/30/2016	H 000072	Business Confidential (BC)

No. CEPR-AP-2015-0001 Attachment B

Schedule (Tab)	Document File Name	Summary of Content	Author	Recipient	Date	PDF Bates Sequence	Confidentiality Designation/Basis
	LIS).pdf Schedule H-5 SUPP CONF (TOU-P and LIS).xlsx	Schedule H-5, as originally filed with the Commission on May 27, 2016, by presenting a bill count and bill frequency analysis of PREPA's proposed tariff schedules.			-		The "TOU-P" tab of Schedule H-5 SUPP has been designated as BC because the TOU-P tariff relates to a limited number of customers that may be easily discerned by the general public; therefore, the information contained in this tab discloses or effectively may disclose these customers' confidential billing information.
Schedule H-5 SUPP ("LIS")	Schedule H-5 SUPP CONF (TOU-P and	These documents supplement	Navigant	PREPA	6/30/2016	H 000074	Business Confidential (BC)
	LIS).pdf Schedule H-5 SUPP CONF (TOU-P and	Schedule H- 5, as originally filed with the Commission					The "LIS" tab of Schedule H-5 SUPP has been designated as BC

No. CEPR-AP-2015-0001 Attachment B

Schedule (Tab)	Document File Name	Summary of Content	Author	Recipient	Date	PDF Bates Sequence	Confidentiality Designation/Basis
	LIS).xlsx	on May 27, 2016, by presenting a bill count and bill frequency analysis of PREPA's proposed tariff schedules.					because the LIS tariff relates to a limited number of customers that may be easily discerned by the general public; therefore, the information contained in this tab discloses or effectively may disclose these customers' confidential billing information.
Schedule M-2 SUPP	Schedule M-2 SUPP CONF.pdf Schedule H-5 SUPP CONF.xlsx	These documents supplement Schedule M-2, as originally filed with the Commission on May 27, 2016, by identifying the portion of PREPA's	Navigant	PREPA	6/30/2016	M 000004	Business Confidential (BC) This document has been designated as BC because it contains a proprietary model developed exclusively for and by Navigant Consulting for its

No. CEPR-AP-2015-0001 Attachment B

Schedule (Tab)	Document File Name	Summary of Content	Author	Recipient	Date	PDF Bates	Confidentiality Designation/Basis
		11				Sequence	1 ,1 , 1
		book cost					sole or authorized
		that, in the					use.
		event of					
		customer					
:	,	bypass,					
		would need					
		to be					
		recovered					
		from the					
		bypassing				•	
		customer to					
		avoid the					
		shifting of					
		such cost to					
		other					
		customers.					

	Schedules		Date Processed	Original Filing Date	Revised Filing Date
A. Summary Schedul	es				n general de la companya de la granda de la companya de la companya de la companya de la companya de la companya La companya de la co
A-1	Computation of Increase in Gross Revenue Requirement	A 000001	5/26/2016	5/27/2016	
A-1 REV.		A 000008	6/20/2016		6/22/2016
A-2	Summary Results of Operations	A 000002	5/26/2016	5/27/2016	
A-3	Summary of Debt Service Requirements	A 000003	5/26/2016	5/27/2016	
A-4	Construction Expenditures and Gross Utility Plant in Service	A 000004	5/26/2016	5/27/2016	
A-4 REV.		A 000009	6/20/2016		6/22/2016
A-5	Summary Financial Position and Changes	A 000005	5/26/2016	5/27/2016	
A-5 REV.		A 000010 – A 000011	6/20/2016		6/22/2016
A-6	Charges and Costs Included Under "Fuel Adjustment" and "Energy Purchase Adjustment"	A 000006 – A 000007	5/26/2016	5/27/2016	
A-6 REV.		A 000012 – A 000014	6/20/2016		6/22/2016
B. Rate Base and Pla	nt Investment				one programme of the control of the
B-1	Summary of Test Year Original Cost Rate Base Elements	B 000001	5/26/2016	5/27/2016	
B-2	Original Cost rate base Pro forma Adjustments (one column per adjustment)	В 000002	5/26/2016	5/27/2016	
B-2 REV.		B 000005	6/20/2016		6/22/2016
B-2	Workpapers	В 000003	5/26/2016	5/27/2016	
B-3	Computation of Working Capital Requirements	В 000004	5/26/2016	5/27/2016	
C. Test Year Income	Statements			4.1.4.4.1.4.3.4.1.3.4.1.1.1.1.1.1.1.1.1.	
C-1	Adjusted Test Year Income Statement	C 000001	5/26/2016	5/27/2016	
C-2	Income Statement Pro forma Adjustments (one column per adjustment)	C 000002	5/26/2016	5/27/2016	
C-2 REV.		C 000005	6/20/2016		6/22/2016
C-2	Workpapers	C 000003	5/26/2016	5/27/2016	
C-3	Computation of Gross revenue Conversion Factor	C 000004	5/26/2016	5/27/2016	
C-3 REV.		C 000006	6/20/2016		6/22/2016
D. Cost of Capital an	d Debt Service Requirements				The second secon
D-1	Summary Cost of Capital and Debt Service Requirements including description and explanation of the "fixed charge on the rate" required by Sec. 6B(b).	D 000001 – D 000002	5/26/2016	5/27/2016	
D-2	Itemized Listing of Long Term Debt and Related Interest and Debt Service Requirements	D 000003	5/26/2016	5/27/2016	
D-2 REV.		D 000009 - D 000022	6/20/2016		6/22/2016

	Schedules		Date Processed	Original Filing Date	Revised Filing Date
D-3	Itemized Listing of Short Term Debt and Related Interest and Debt Service Requirements	D 000004	5/26/2016	5/27/2016	
D-4	Capital Leases and Payment Requirements	D 000005	5/26/2016	5/27/2016	
D-5	Long-Term Purchased Power Agreements	D 000006	5/26/2016	5/27/2016	
D-6	Itemized List of Debt Securitized Through the Securitization Process Set Forth in the PREPA Revitalization Act	D 000007 – D 000008	5/26/2016	5/27/2016	
E. Financial Statements and S	Statistical Schedules				was alka ya a ji waya ta a sa sa yaya a fasa isa a sa Kanalasari wasa ka a sa ka ka a sa ka
E-1	Comparative Balance Sheets	E 000001	5/26/2016	5/27/2016	
E-2	Comparative Income Statements	E 000002	5/26/2016	5/27/2016	
E-3	Comparative Statement of Changes in Financial Position	E 000003	5/26/2016	5/27/2016	
E-4	Statement of Changes in Owners' Equity	E 000004	5/26/2016	5/27/2016	·
E-5	Detail of Utility Plant	E 000005	5/26/2016	5/27/2016	
E-5 CORR.		E 000118	6/20/2016		6/22/2016
E-6	Comparative Departmental/Functional Operating Income Statements	E 000006	5/26/2016	5/27/2016	
E-7	Operating Statistics	E 000007	5/26/2016	5/27/2016	
E-7 REV.		E 000119	6/20/2016		6/22/2016
E-8	Contributions in Lieu of Taxes	E 000008	5/26/2016	5/27/2016	
E-8 REV.		E 000120 - E 000124	6/20/2016		6/22/2016
E-9	Notes to Financial Statements	E 000009 - E 000117	5/26/2016	5/27/2016	
F. Projections and Forecasts					
F-1	Projected Income Statements – Present and Proposed Rates	F 000001 – F 000004	5/26/2016	5/27/2016	
F-2	Projected Charges in Financial Position and Debt Service Coverage – Present and Proposed Rates	F 000005 – F 000008	5/26/2016	5/27/2016	
F-3	Projected Construction Requirements	F 000009 – F 000014	5/26/2016	5/27/2016	
F-3 REV.		F 000023 – F 000037	6/20/2016		6/22/2016
F-4	Assumptions Used in Developing Projections	F 000015 – F 000022	5/26/2016	5/27/2016	
G. Cost of Service Study and	Rate Design				
G-1	Fully Allocated Embedded Cost of Service Summary – Present Rates	G 000001	5/26/2016	5/27/2016	
G-2	Fully Allocated Embedded Cost of Service Summary – Proposed Rates	G 000002	5/26/2016	5/27/2016	
G-3	Allocation of Revenue Requirement to Classes of Service	G 000003	5/26/2016	5/27/2016	
G-4	Allocation of Expenses to Classes of Service	G 000004	5/26/2016	5/27/2016	
G-5	Development of Allocation Factors	G 000005	5/26/2016	5/27/2016	

	Schedules		Date Processed	Original Filing Date	Revised Filing Date
G-6	Alternative Cost of Service Methodologies	G 000006	5/26/2016	5/27/2016	
H. Effect of Proposed Ta	riff Schedules	and a second and a The Conference of the Confe			
H-1	Summary of Revenues by Customer Classification — Present and Proposed Rates	Н 000001 — Н 000003	5/26/2016	5/27/2016	
I-2	Analysis of Revenue Requirement by Detailed Class of Service – Present and Proposed Rates By Each Class of Service	Н 000004 — Н 000025	5/26/2016	5/27/2016	
H-3 .	Changing in Representative Rate Schedules By Each Class of Service	H 000004 – H 000025	5/26/2016	5/27/2016	
H-4	Customer Bill Impact Analysis	Н 000026 – Н 000053	5/26/2016	5/27/2016	
H-5	Bill Count – Bill Frequency Analysis	H 000004 - H 000025	5/26/2016	5/27/2016	
H-5 SUPP. CONF		H 000056 – H 000074	6/29/2016	5,2,,2010	6/30/2016
I-6		H 000054 – H 000055	5/26/2016	5/27/2016	0/30/2010
. Required Reports	gleren gerenen er fram er kan der var var det er var er				
-1	Consulting Engineers' Report for Fiscal Year that is Being Used as the Historic Test Year	I 000001 – I 00132	5/26/2016	5/27/2016	<u> </u>
2	Audited Financial Statements for the Fiscal year that is Being Used as the Historic Tests Year	I 000133 – I 000275	5/26/2016	5/27/2016	
i-3	Chief Restructuring Officers' Reports to PREPA Board	I 000276 – I 001330	5/26/2016	5/27/2016	
-4	Business Plan	I 001331 – I 001381	5/26/2016	5/27/2016	
. Tariffs					
Γ-1	Proposed Tariffs	J 000001 – J 000064	5/26/2016	5/27/2016	
1-2	Current Tariffs with Proposed Changes Shown in Legal Redline	Ј 000065 — Ј 000221	5/26/2016	5/27/2016	
-3	Plan of Administration for Each Surcharge or Rider	Ј 000222	5/26/2016	5/27/2016	
-3 REV.		J 000225 - 000234	6/29/2016		6/30/2016
- 4	Draft Energy Efficiency Tariff Rider	J 000223	5/26/2016	5/27/2016	
-4 REV.		J 000235 - 000236	6/29/2016		6/30/2016
-5	Draft Tariff for a Decoupling Mechanism	J 000224	5/26/2016	5/27/2016	
J-5 REV.		J 000237 - 000238	6/22/2016		6/30/2016

	Schedules		Date Processed	Original Filing Date	Revised Filing Date
K-1	A description of the function of the companies operating within PREPA Holdings, including (but not limited to): PREPA Networks, LLC (also known as PREPA.Net), InterAmerican Energy Sources, LLC, and Consolidated Telecom of Puerto Rico, LLC. A list of the officers and directors/board members of each of these companies if different from the officers or board members of PREPA.	K 000001 – K 000002	5/26/2016	5/27/2016	
L. Information on Fixed	Charge and Subsidies and Incentives and Optional	Additional Information			
L-1	A proposed fixed charge showing the amount customers shall pay on account of PREPA's obligations to bondholders, which would guarantee the annual payment of PREPA's obligations to bondholders	L 000001	5/26/2016	5/27/2016	
L-1 SUPP.		L 000003	6/30/2016		6/30/2016
L-2	A description of any "subsidy or incentive related to electric power service," and the effects of such subsidy or incentive on the rates paid by nonsubsidized customers. (See Sec. 22 of Act 83, as amended by Sec. 2.10 of Act 57.)	L 000002	5/26/2016	5/27/2016	
L-2 SUPP.	<u> </u>	L 000004 - L 000005	6/29/2016		6/30/2016
M. Optional Proposals a	and Required Information if PREPA's Filing Includ	es such Proposals		aran ay arang kabupatèn Kabupatèn Balandaran da kabupatèn Kabupat	
M-1	Traditional Rate Design proposals will be shown on Schedule M-1	М 000001	5/26/2016	5/27/2016	
M-2	Alternative Rate Design proposals, such as increased fixed charges, will be shown on Schedule M-2. Bill impact analysis of alternative rate design proposals for increased fixed charges will be shown, along with impacts of traditional rate design (required), for comparative purposes, on Schedule H-4	М 000002	5/26/2016	5/27/2016	
M-2 SUPP		М 000004	6/28/2016		6/30/2016
M-3	Any Other Rate Design Proposal PREPA Wishes the Commission to Consider	М 000003	5/26/2016	5/27/2016	

	Schedules		Date Processed	Original Filing Date	Revised Filing Date		
N. Optional Formula Rate Plan Proposal and Required Information if PREPA's Filing Includes such a Proposal							
N-1	(Optional) Formula Rate Plan proposals, if any are being made, will be shown on Schedule N-1	N 000001	5/26/2016	5/27/2016			
N-1 REV		N 000002 - N 000003	6/22/2016		6/30/2016		

GRS

				% of	Cumulative % of	Cumulative % of	
kWh Range	Bill Frequency	% of Bills	Consumption	Avg. Consumption/Bill	Consumption	Consumption	Bills
0-100	1,234,874	10.2%	67,972,102	55	1.3%	1.3%	10.2%
100-200	2,216,768	18.2%	337,786,059	152	6.7%	8.0%	28.4%
200-300	2,335,266	19.2%	580,884,543	249	11.5%	19.5%	47.6%
300-400	1,817,016	15.0%	631,648,830	348	12.5%	32.0%	62.6%
400-425	341,261	2.8%	141,060,564	413	2.8%	34.7%	65.4%
425-500	937,657	7.7%	431,127,891	460	8.5%	43.3%	73.1%
500-600	902,045	7.4%	493,731,611	547	9.8%	53.0%	80.5%
600-700	633,407	5.2%	410,062,495	647	8.1%	61.1%	85.7%
700-800	445,449	3.7%	332,910,908	747	6.6%	67.7%	89.4%
800-900	318,475	2.6%	269,916,489	848	5.3%	73.0%	92.0%
900-1000	231,585	1.9%	219,457,543	948	4.3%	77.3%	93.9%
1000-1100	168,985	1.4%	177,052,802	1,048	3.5%	80.8%	95.3%
1100-1200	124,713	1.0%	143,128,409	1,148	2.8%	83.7%	96.3%
Greater than 1200	445,449	3.7%	827,088,031	1,857	16.3%	100.0%	100.0%

Total Bill Count

12,152,950

RH3

			Total kWh		% of	Cumulative % of	Cumulative % of
kWh Range	Bill Frequency	% of Bills	Consumption	Avg. Consumption/Bill	Consumption	Consumption	Bills
0-100	12,550	16.1%	753,029	60.00234741	3.3%	3.3%	16.1%
100-200	23,350	29.9%	3,473,293	148.7491456	15.3%	18.6%	45.9%
200-300	15,282	19.6%	3,770,996	246.7606334	16.6%	35.1%	65.5%
300-400	10,276	13.2%	3,563,684	346.7968081	15.7%	50.8%	78.7%
400-425	1,893	2.4%	781,742	412.9646064	3.4%	54.2%	81.1%
425-500	4,265	5.5%	1,956,508	458.7357562	8.6%	62.8%	86.5%
500-600	3,456	4.4%	1,889,288	546.6689815	8.3%	71.1%	91.0%
600-700	2,100	2.7%	1,358,521	646.9147619	6.0%	77.1%	93.7%
700-800	1,494	1.9%	1,115,518	746.665328	4.9%	82.0%	95.6%
800-900	1,029	1.3%	870,744	846.2040816	3.8%	85.8%	96.9%
900-1000	640	0.8%	605,358	945.871875	2.7%	88.5%	97.7%
1000-1100	516	0.7%	540,218	1046.934109	2.4%	90.8%	98.4%
1100-1200	366	0.5%	421,062	1150.442623	1.8%	92.7%	98.8%
Greater than 1200	915	1.2%	1,662,280	1816.699454	7.3%	100.0%	100.0%

Total Bill Count

LRS

			Total kWh	Avg.	% of	Cumulative % of	Cumulative % of
kWh Range	Bill Frequency	% of Bills	Consumption	Consumption/Bill	Consumption	Consumption	Bills
0-100	175,725	9.1%	11,064,609	62.96548015	2.0%	2.0%	, 9.1%
100-200	521,334	26.9%	79,904,731	153.2697484	14.7%	16.7%	36.0%
200-300	541,227	28.0%	134,145,965	247.8552714	24.7%	41.4%	64.0%
300-400	344,281	17.8%	118,930,786	345.4468472	21.9%	63.3%	81.8%
400-425	52,292	2.7%	21,597,652	413.0201943	4.0%	67.3%	84.5%
425-500	119,100	6.2%	54,583,196	458.2971956	10.0%	77.3%	90.6%
500-600	84,036	4.3%	45,793,269	544.9244252	8.4%	85.7%	95.0%
600-700	43,056	2.2%	27,773,410	645.0531865	5.1%	90.8%	97.2%
700-800	23,227	1.2%	17,315,357	745.4840057	3.2%	94.0%	98.4%
800-900	12,504	0.6%	10,574,932	845.7239283	1.9%	96.0%	99.0%
900-1000	7,240	0.4%	6,845,744	945.5447514	1.3%	97.2%	99.4%
1000-1100	4,251	0.2%	4,446,164	1045.910139	0.8%	98.1%	99.6%
1100-1200	2,473	0.1%	2,834,895	1146.338455	0.5%	98.6%	99.8%
Greater than 1200	4,780	0.2%	7,720,888	1615.248536	1.4%	100.0%	100.0%

Total Bill Count

1,935,526

RFR

			Total kWh	Avg.	% of	Cumulative % of Cumulative %	
kWh Range	Bill Frequency	% of Bills	Consumption	Consumption/Bill	Consumption	Consumption	Bills
0-100	31,844	6.9%	1,019,259	32.00788218	0.4%	0.4%	6.9%
100-200	42,108	9.1%	6,587,971	156.4541417	2.8%	3.2%	15.9%
200-300	63,388	13.7%	15,915,856	251.0862624	6.8%	10.0%	29.6%
300-400	67,789	14.6%	23,735,203	350.1335467	10.1%	20.1%	44.2%
400-425	15,416	3.3%	6,368,679	413.1213674	2.7%	22.8%	47.5%
425-500	44,385	9.6%	20,438,168	460.4746649	8.7%	31.5%	57.1%
500-600	48,814	10.5%	26,787,361	548.7638997	11.4%	42.9%	67.6%
600-700	40,408	8.7%	26,207,810	648.5797367	11.1%	54.0%	76.3%
700-800	32,258	7.0%	24,140,071	748.3436977	10.3%	64.2%	83.3%
800-900	24,199	5.2%	20,513,200	847.687921	8.7%	73.0%	88.5%
900-1000	17,165	3.7%	16,252,218	946.8230702	6.9%	79.9%	92.2%
1000-1100	11,944	2.6%	12,508,889	1047.294792	5.3%	85.2%	94.7%
1100-1200	7,865	1.7%	9,023,198	1147.259758	3.8%	89.0%	96.4%
Greater than 1200	16,532	3.6%	25,855,009	1563.937152	11.0%	100.0%	100.0%

Total Bill Count

GSS

			Total kWh	Avg.	% of	Cumulative % of Cumulative %	
kWh Range	Bill Frequency	% of Bills	Consumption	Consumption/Bill	Consumption	Consumption	Bills
0-250	293,640	23.1%	33,012,335	112.4245164	1.6%	1.6%	23.1%
250-500	203,265	16.0%	74,986,659	368.9108258	3.6%	5.1%	39.1%
500-750	149,404	11.8%	92,378,088	618.3106744	4.4%	9.5%	50.8%
750-1000	107,045	8.4%	93,011,769	868.9034425	4.4%	13.9%	59.3%
1000-1250	78,799	6.2%	88,165,447	1118.865049	4.2%	18.1%	65.5%
1250-1500	61,576	4.8%	84,431,752	1371.17955	4.0%	22.1%	70.3%
1500-1750	53,352	4.2%	86,488,715	1621.096023	4.1%	26.2%	74.5%
1750-2000	37,204	2.9%	69,523,804	1868.718525	3.3%	29.5%	77.4%
2000-2250	29,838	2.3%	63,303,391	2121.569509	3.0%	32.5%	79.8%
2250-2500	25,598	2.0%	60,713,973	2371.824869	2.9%	35.4%	81.8%
2500-2750	21,281	1.7%	55,775,897	2620.924628	2.6%	38.1%	83.5%
2750-3000	18,084	1.4%	51,931,350	2871.673855	2.5%	40.5%	84.9%
3000-3250	15,380	1.2%	48,017,676	3122.085566	2.3%	42.8%	86.1%
Greater than 3250	176,645	13.9%	1,204,045,984	6816.190574	57.2%	100.0%	100.0%

Total Bill Count

1,271,111

GSP

			Total kWh	Avg.	% of	Cumulative % of Cumulative %	
kWh Range	Bill Frequency	% of Bills	Consumption	Consumption/Bill	Consumption	Consumption	Bills
0-2500	8,348	7.1%	10,415,510	1248	0.2%	0.2%	7.1%
2500-5000	11,410	9.7%	71,591,046	6274	1.5%	1.8%	16.7%
5000-7500	11,184	9.5%	97,790,609	8744	2.1%	3.9%	26.2%
7500-10000	10,294	8.7%	115,476,164	11218	2.5%	6.4%	34.9%
10000-12500	9,078	7.7%	124,684,977	13735	2.7%	9.0%	42.6%
12500-15000	7,638	6.5%	123,818,960	16211	2.7%	11.7%	49.0%
15000-17500	6,208	5.3%	116,073,980	18697	2.5%	14.2%	54.3%
17500-20000	5,176	4.4%	109,853,868	21225	2.4%	16.6%	58.6%
20000-22500	451	0.4%	106,626,804	236318	2.3%	18.9%	59.0%
22500-25000	4,055	3.4%	106,336,972	26222	2.3%	21.2%	62.5%
25000-27500	3,910	3.3%	112,458,326	28765	2.4%	23.6%	65.8%
27500-30000	3,671	3.1%	114,608,565	31222	2.5%	26.1%	68.9%
30000-32500	3,276	2.8%	110,480,497	33728	2.4%	28.4%	71.6%
Greater than 32500	33,535	28.4%	3,321,790,344	99054	71.6%	100.0%	100.0%

Total Bill Count

GAS

			Total kWh	Avg.	% of	Cumulative % of Cumulative %	
kWh Range	Bill Frequency	% of Bills	Consumption	Consumption/Bill	Consumption	Consumption	Bills
0-250	3,757	32.2%	330,683	88.01783338	1.3%	1.3%	32.2%
250-500	1,240	10.6%	447,087	360.5540323	1.8%	3.2%	42.8%
500-750	685	5.9%	425,939	621.8087591	1.7%	4.9%	48.7%
750-1000	588	5.0%	511,151	869.3044218	2.1%	7.0%	53.7%
1000-1250	408	3.5%	454,157	1113.129902	1.9%	8.9%	57.2%
1250-1500	341	2.9%	470,306	1379.196481	1.9%	10.8%	60.1%
1500-1750	404	3.5%	654,010	1618.836634	2.7%	13.4%	63.6%
1750-2000	306	2.6%	571,419	1867.382353	2.3%	15.8%	66.2%
2000-2250	251	2.1%	531,897	2119.111554	2.2%	17.9%	68.3%
2250-2500	253	2.2%	600,410	2373.162055	2.5%	20.4%	70.5%
2500-2750	260	2.2%	681,172	2619.892308	2.8%	23.2%	72.7%
2750-3000	242	2.1%	694,473	2869.72314	2.8%	26.0%	74.8%
3000-3250	221	1.9%	690,511	3124.484163	2.8%	28.8%	76.7%
Greater than 3250	2,721	23.3%	17,441,956	6410.127159	71.2%	100.0%	100.0%

Total Bill Count

GST (618 Customers)

_	Usage	Block 1 Usage	Block 2 Usage	KVA Billed	KVA Real	KVA Ratcheted
1	6,950	6,950	(6,672)	53	200	200
2	18,620	13,226	3,136	305	70	
3	23,298	23,298	(5,478)	125	187	187
5	23,364 31,080	17,503 31,080	4,541 (214,648)	1,133 958	46 819	277 889
6	56,760	39,600	17,160	300	106	211
7	57,578	30,452	26,690	1,778	152	190
8	59,664	48,365	11,299	1,260	393	475
9	67,584	64,944	(146,652)	2,160	158	1,901
10	87,120	87,120	(49,104)	533	744	744
11	96,822	96,822	(105,138)	1,800	79	950
12	97,891	77,141	(1,901)	2,022	257	3,089
13	102,960	92,466	(14,851)	2,165	170	1,192
14	103,297	88,744	14,553	1,770	311	346
15 16	104,148 109,217	74,210 109,217	23,958 (239,263)	1,372	178	891
17	114,840	95,040	15,841	1,372	343 53	1,373
18	117,348	117,348	(9,372)	499	499	499
19	125,334	117,612	3,564	1,800	909	974
20	126,905	77,088	49,817	333	998	998
21	132,759	87,417	45,343	747	792	866
22	133,420	133,419	(172,762)	2,200	140	1,681
23	133,650	90,090	36,234	1,800	79	950
24	134,640	134,640	(693,990)	3,348	348	3,485
25	140,580 144,289	133,551 144,289	6,930 (97,667)	2,320 1,800	57 1,204	689 1,426
27	144,606	54,542	90,064	366	262	524
28	153,450	148,698	(1,058,310)	10,800	713	8,554
29	158,796	158,796	(319,968)	2,585	376	3,386
30	164,017	164,018	(95,728)	1,800	1,256	1,421
31	165,000	165,000	(153,780)	1,520	1,168	1,551
32	185,592	185,591	(60,325)	2,520	1,111	1,742
33	191,862 205,326	191,863 133,115	(213,245)	2,160	178	2,138
35	205,326	198,396	53,856 (11,880)	3,090 1,800	115 111	1,378 1,331
36	208,692	208,692	(55,678)	1,685	104	1,251
37	215,577	215,577	(1,265,523)	5,228	4,937	5,892
38	218,772	218,772	(92,577)	1,800	121	1,449
39	226,710	226,710	(140,382)	1,818	156	1,877
40	231,422	208,058	(471,478)	5,616	3,267	5,354
41	238,709	238,709	(1,464,487)	7,113	937	11,246
42 43	242,880 247,163	241,560 246,932	(24,420)	1,785 1,889	1,332 239	1,441 2,864
44	261,558	259,578	(229,086)	2,562	309	3,707
45	268,884	268,884	(253,044)	2,520	1,750	2,075
46	275,893	275,893	(290,585)	2,353	2,143	3,089
47	278,586	278,586	(140,778)	1,954	1,950	2,115
48	283,457	247,817	(67,597)	1,800	119	1,426
49	287,100	287,099	(890,209)	4,719	4,545	6,304
50 51	290,400 295,020	290,400 295,020	(236,280)	2,002 2,795	198 1,892	2,376 3,854
52	296,340	163,350	132,990	1,937	1,892	2,059
53	300,960	249,084	42,926	3,072	412	2,471
54	302,016	302,016	(174,174)	2,109	366	2,198
55	311,190	311,190	(164,010)	2,063	356	2,134
56	323,400	315,480	(223,080)	48,140	2,070	3,358
57	332,442	263,340	69,102	1,775	119	1,426
⁵⁸ 59	346,896 362,815	346,896 334,283	(193,248)	2,058	2,057 195	2,392
60	364,716	190,080	(17,345) 174,636	1,691 1,800	1,234	2,336 1,267
61	366,313	366,312	(465,288)	2,894	2,895	3,041
62	368,003	333,234	(343,609)	3,195	315	3,778
63	369,072	312,246	8,514	1,291	1,291	1,544
64	392,238	392,239	(347,885)	4,320	285	3,421
65	396,000	396,000	(380,952)	3,234	283	3,398
66	397,884	389,366	(692,919)	4,388	3,934	5,431
67	411,088	411,088	(633,164)	4,560	388	4,657
68 69	415,008 415,668	415,008 295,152	(216,612) 110,748	3,420 2,372	450 264	5,401
70	425,581	425,581	(1,150,499)	6,283	1,287	3,168 7,722
71	431,640	402,732	20,988	1,514	218	1,742
72	433,552	433,551	(66,139)	2,203	2,204	2,339
73	433,620	280,632	(81,180)	3,228	990	9,900
74	442,200	442,200	(405,240)	3,260	3,260	3,960

GST	(618	Customers

	Usage	Block 1 Usage	Block 2 Usage	KVA Billed	KVA Real	KVA Ratcheted
75	443,520	425,040	(11,484)	1,858	170	2,043
76 77	444,708 448,391	222,156 411,642	222,552 (1,049,677)	1,307 6,491	139 1,140	1,247 7,983
78	451,440	451,440	(237,600)	3,091	281	3,374
79	463,082	463,083	(125,769)	2,927	280	3,358
80	481,800	471,075	(7,260)	2,214	210	2,515
81	482,460	482,460	(501,204)	4,840	467	5,607
82 83	487,740 497,508	487,740 497,508	(159,324) (283,008)	2,391 2,841	2,389 2,814	2,709 3,421
84	499,620	315,612	184,008	1,437	418	1,674
85	501,600	501,600	(1,607,100)	9,303	8,128	10,230
86	509,718	495,462	3,247	2,173	2,292	2,471
87 88	510,191 518,760	510,191 467,537	(330,709)	2,803 1,892	2,803 1,873	2,976 1,948
89	533,207	533,207	(342,943)	2,857	253	3,033
90	533,280	242,748	290,532	4,455	1,540	1,711
91	538,032	431,772	44,220	2,414	2,330	2,930
92	543,642	529,518	(8,976)	3,240	204	2,447
93 94	545,424 546,216	545,424 546,216	(829,884) (109,164)	6,657 3,398	577 3,396	6,922 3,612
95	547,470	547,470	(1,213,285)	6,819	6,237	6,294
96	550,836	402,732	148,104	1,800	1,628	1,711
97	561,660	561,660	(753,060)	5,296	620	7,445
98	563,970	429,198	128,370	2,292	215 241	2,574
99	564,432 564,828	556,512 470,580	(29,766) 93,984	2,704 2,027	1,837	2,891 2,091
101	566,689	393,426	162,373	2,630	1,944	3,588
102	568,260	568,260	(353,074)	4,133	3,998	4,562
103	572,022	564,894	(20,196)	2,090	190	2,281
104	577,368	569,382	(36,432)	2,505	2,505	2,693
105 106	579,293 592,152	579,293 592,152	(614,003) (237,468)	5,474 3,613	473 3,602	5,673 4,229
107	604,296	-560,076	43,560	2,027	185	2,218
108	606,613	606,613	(944,908)	10,294	983	11,797
109	608,467	608,467	(348,665)	4,902	385	4,625
110	608,520	608,520 340,362	(405,240) 270,270	3,426	317	3,802 1,386
111 112	610,632 611,226	538,164	73,062	1,386 2,520	1,386 218	2,614
113	615,648	615,648	(537,108)	4,057	3,968	4,752
114	618,288	618,288	(141,240)	3,241	3,241	3,421
115	623,337	492,030	131,307	2,204	1,911	2,344
116 117	647,724 650,364	528,660 650,363	(197,736) (238,063)	12,190 3,792	594 339	7,128 4,071
118	653,202	653,202	(318,582)	5,804	497	5,964
119	658,020	657,215	(53,196)	2,518	2,519	2,629
120	663,069	376,200	286,869	1,478	1,478	1,478
121	666,732	445,104	221,628	5,797	3,014	16,331
122	681,912 682,176	681,912 682,176	(262,548) (835,692)	3,493 6,286	3,456 6,278	4,514 6,985
124	685,476	680,328	(251,856)	3,644	3,556	4,063
125	690,624	594,013	87,516	2,338	2,338	2,978
126	693,000	693,000	(1,834,668)	11,550	9,839	13,306
127	708,840	463,320	245,520 279,180	1,824	158	1,901 1,362
128 129	712,800 723,060	433,620 393,048	330,012	1,800 1,974	1,290 137	1,646
130	724,812	724,812	(549,120)	6,011	6,010	7,112
131	726,423	508,799	217,624	3,195	2,015	2,182
132	748,440	748,440	(1,003,860)	14,400	6,776	7,603
133 134	760,056 763,290	760,056 715,958	(1,214,479)	6,671 2,655	610 2,631	7,318 2,863
134	773,497	737,296	(2,409,803)	10,701	10,701	11,784
136	779,407	533,016	241,243	3,240	238	2,851
137	780,450	780,450	(125,400)	3,919	3,914	4,158
138	792,000	356,400	435,600	1,425	1,267	- 7 274
139 140	811,879 815,760	811,878 785,268	(850,134) (272,052)	6,574 4,133	4,910	7,271 6,336
141	820,116	816,157	(159,983)	11,448	4,910	4,835
142	827,310	431,640	395,670	5,492	630	7,564
143	831,600	804,342	(237,600)	5,940	3,828	5,346
144	839,124	788,674	(3,168)	3,176	3,101	3,707
145 146	839,454 841,526	710,028 834,926	129,427 (76,798)	2,458 4,680	2,459 4,187	2,701 4,499
147	851,004	799,128	12,672	3,595	3,645	4,277
148	869,220	869,220	(1,287,000)	8,387	733	8,791
149	870,144	734,580	135,564	3,177	300	3,596

GST	(618 Customers
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155		Usage	Block 1 Usage	Block 2 Usage	KVA Billed	KVA Real	KVA Ratcheted
1525 893,772 878,724 739,070 4,060 4,077 4,675 1,515 917,800 904,200 805,370 10,680 3,485 3,861 155 922,680 904,200 (805,370 10,680 3,485 3,861 155 922,680 369,070 (1,481,240) 5,579 714 5,580 1,714 5,71	150	873,708	873,708	(263,604)	4,180		
911,988 911,988 (713,196) 7,383 7,181 7,388 155 917,40 940,20 (80,520) 1,080 3,485 3,681 3,681 155 922,880 922,880 (30,500) 4,760 466 5.277 155 922,880 859,320 (1,62,620) 8,559 774 8,569 1137 943,074 944,074 (1,212,522) 9,255 866 10,383 158 956,380 922,770 (16,196) 3,592 3,502 3,501 4,594 100 964,260 867,240 97,000 3,502 3,501 4,594 100 964,260 867,240 97,000 3,502 3,501 4,594 100 964,260 867,240 97,000 3,502 3,501 4,594 100 969,659 905,256 2,574 4,655 331 6,588 165 993,960 720,770 172,240 2,402 2,402 2,533 165 993,960 720,770 172,240 2,402 2,402 2,533 165 993,960 1,000,988 1,000							
155 922,680 92,2680 6306,900 4,760 436 5,277 157 944,074 943,074 (1,121,52) 9,255 865 10,383 158 956,380 922,720 (16,196) 3,595 3,393 3,788 159 964,260 867,40 97,020 3,902 3,901 4,594 150 996,066 905,356 2,574 4,656 531 5,388 151 938,900 770,720 273,240 2,402 2,402 2,534 152 999,000 999,000 (1,067,220) 8,602 8,084 8,102 153 1,010,988 1,010,988 (199,984) 5,040 4,351 4,910 154 1,072,724 335,600 650,624 1,550 1,201 1,515 156 1,033,580 1,035,580 (151,495) 7,700 570 6,843 157 1,035,580 1,035,580 (151,495) 7,500 570 6,843 157 1,035,100 1,038,728 (106,676) 4,757 4,575 3,316 158 1,053,720 2,032,728 (106,676) 4,757 4,575 3,366 1,033,720 1,032,738 (106,676) 4,757 4,575 3,366 1,035,720 1,032,738 4,765,20 4,110 2,138 2,538 100 1,053,720 1,032,738 4,765,20 4,110 2,138 2,538 100 1,053,720 1,033,739 4,765,20 4,110 2,138 2,538 177 1,070,784 6,63,93 4,669,395 5,260 3,260 3,273 4,669 178 1,104,266 1,015,344 61,776 4,890 4,295 4,918 178 1,113,880 1,033,892 5,344 4,186 4,151 4,942 1,114,444 1,100,88 6,346 4,874 4,880 4,295 4,918 1,115,695 1,125,626 (1,435,490) 13,311 2,288 13,777 1,144,444 1,100,88 6,346 4,674 4,680 4,595 4,918 1,115,695 1,125,626 (1,435,490) 13,311 2,288 13,777 1,144,444 1,100,88 6,346 4,674 4,680 4,694 4,694 4,694 1,138,80 1,033,892 5,344 4,186 4,151 4,942 1,131,980 79,886 3,460 3,460 3,460 3,360 3,460 1,133,890 1,234,890 1,351 2,288 1,377 1,145,800 1,262,800 1,253,800 1,351 2,288 1,377 1,145,800 1,262,800 1,253,800 1,351 2,288 1,377 1,145,800 1,262,800 1,253,800 1,351 3,400 4,500 1,144,400 1,144,400 4,666,400 1,466 4,500 4,500							
155 922,880 859,320 (1,126),349 8,559 7.14 8,569 10,383 155 964,3074 (1,121),552 9,255 865 10,383 158 964,260 887,240 97,020 3,995 3,393 3,786 160 969,666 905,256 2,574 4,696 531 6,588 161 999,960 905,256 2,574 4,696 531 6,588 161 999,990 995,900 1,057,220 8,602 2,402 2,402 2,534 162 999,900 999,900 1,1067,220 8,602 8,084 8,102 165 1,010,988 1,010,988 1,010,988 1,010,988 1,010,988 1,010,988 1,010,988 1,010,988 1,010,988 1,010,988 1,010,989 1,010,99							
157 943,074 943,074 (1,212,52) 9,255 865 10,383 13,786 158 964,260 867,240 97,020 3,902 3,901 4,549 150 964,260 867,240 97,020 3,902 3,901 4,549 150 969,066 905,256 2,574 4,656 531 6,388 151 993,960 720,720 273,240 2,402 2,402 2,534 151 993,960 720,720 273,240 3,602 3,048 3,100 164 1,027,224 336,600 600,624 1,650 1,200 1,525 165 1,001,988 1,010,988 1,99,840 5,640 4,361 4,910 1,525 166 1,032,035 1,032,035 (151,933) 7,700 570 6,843 1,650 1,033,560 (201,335,600 620,624 1,650 1,200 5,700 6,843 1,670 1,033,560 1,032,035 (319,833) 7,700 570 6,843 1,671 1,035,160 1,032,732 (106,676) 4,575 4,575 5,366 1,033,100 1,032,732 (106,676) 4,575 4,575 5,366 1,038,100 1,032,732 (106,676) 4,575 4,575 5,366 1,038,100 1,038,700 (241,847) 5,588 5,588 5,588 5,384 1,000,600 591,944 369,8245 3,641 2,549 4,683 3,171 1,070,784 636,828 439,956 2,303 2,303 2,439 1,72 1,068,700 713,592 372,108 3,101 3,004 3,305 3,341 4,454 4,155 4,143 4,594 4,155 4,143 4,594 4,144 4							
158							
159							
15.1 999,900 920,900 939,900 1,067,220 8,084 8,100. 15.2 939,900 399,900 1,067,220 8,084 8,100. 15.4 1,010,988 1,010,988 1,101,9	159			97,020	3,902	3,901	
160 999,900 999,900 1,1067,220 8,082 8,084 8,102 183 1,101,988 1,101,988 1,101,988 1,102,224 336,600 690,624 1,650 1,201 1,525 1,555 5,318 5,401 165 1,032,095 1,032,095 (21,344) 5,655 5,318 5,401 167 1,033,500 1,033,500 (21,344) 5,655 5,318 5,401 167 1,034,600 1,032,798 (108,676) 4,575 4,575 5,536 1,665 1,035,700 241,847 5,988 5,988 5,488 1,038,700 1,035,709 241,847 5,988 5,988 5,488 1,056,700 574,200 476,520 4,110 2,189 2,534 1,70 1,055,000 591,941 398,245 3,641 2,449 4,653 1,71 1,076,784 650,828 439,856 2,303 2,303 2,303 2,435 1,72 1,085,700 731,592 372,108 3,016 3,016 3,338 1,73 1,088,472 769,164 (1,716) 4,756 4,343 4,534 1,74 1,102,466 6,303,828 488,784 4,880 4,285 4,348 4,176 1,112,800 6,303,828 58,344 4,186 4,515 4,342 4,186 1,776 1,122,890 1,033,692 8,8344 4,186 4,151 4,342 4,186 1,776 1,122,890 1,033,692 8,8344 4,186 4,151 4,342 4,186							
1,010,988							
156							
1,033,560	164		336,600	690,624	1,650	1,201	1,525
169							
1,038,710							
169	- +			·			
1712	169						
172	-						
173	-						
1,104,246	- H						
176	- H						
1,124,244	-						3,176
178 1,125,625 1,125,626 (1,435,490) 13,311 2,288 13,727 179 1,138,104 1,120,416 (112,068) 5,461 519 6,225 180 1,163,646 1,010,394 125,528 3,510 380 4,562 181 1,185,360 1,028,280 155,760 3,951 3,949 4,467 182 1,191,980 791,862 408,078 4,074 3,073 3,374 184 1,204,170 1,204,170 (54,190) 7,342 726 8,712 185 1,209,780 1,152,360 15,840 4,221 358 4,301 186 1,216,550 1,119,954 19,140 4,926 4,924 8,150 187 1,212,1660 1,231,660 1,231,660 1,231,660 1,231,460 4,505 4,505 4,505 1,687 188 1,238,160 1,070,045 161,329 4,506 4,505 5,687 190 1,289,970 779,368 510,602							
1,138,104							
1,163,646	-						·
182 1,191,960 759,469 426,294 2,878 2,865 3,326 184 1,204,170 1,204,70 (542,190) 7,342 726 8,771 185 1,209,780 1,152,360 15,840 4,221 358 4,301 186 1,216,050 1,119,954 19,40 4,926 4,924 8,150 187 1,221,660 1,221,660 (1,239,876) 11,658 1,056 12,672 188 1,238,160 1,070,784 167,376 3,813 346 4,150 189 1,289,070 779,368 510,602 3,156 3,338 3,742 190 1,289,970 779,368 510,602 3,156 3,338 3,742 191 1,289,778 1,299,777 (1,371,837) 13,588 2,314 13,883 192 1,304,556 1,163,712 64,284 9,146 1,069 11,761 193 1,326,600 744,282 582,318 2,885 1,449 2	180					380	
1,199,880	+						
184 1,204,170 1,204,170 (542,190) 7,342 726 8,712 185 1,209,780 1,152,360 15,840 4,221 358 4,301 186 1,216,050 1,119,954 19,140 4,926 4,924 8,150 187 1,221,660 1,216,060 (1,239,876) 11,658 1,056 12,672 188 1,238,160 1,070,045 161,329 4,506 4,505 5,687 190 1,289,970 779,368 510,602 3,156 3,398 3,742 191 1,299,778 1,299,777 (1,371,837) 13,588 2,314 13,883 192 1,304,556 1,163,712 64,284 9,146 1,069 11,761 193 1,326,600 744,282 582,318 2,885 1,449 2,899 194 1,330,245 1,229,016 (33,793) 7,847 5,632 10,798 195 1,381,248 1,231,956 149,292 5,283 5,283	-						
188 1,209,780 1,152,360 15,840 4,221 358 4,301 186 1,215,050 1,119,954 19,140 4,926 4,924 8,150 187 1,221,660 1,229,670 11,658 1,056 12,672 188 1,238,160 1,070,784 167,376 3,813 346 4,150 189 1,289,070 779,368 510,602 3,156 3,398 3,742 191 1,299,778 1,299,777 (1,371,837) 13,588 2,314 13,883 192 1,304,556 1,163,712 64,284 9,146 1,009 11,761 193 1,326,600 744,282 582,318 2,885 1,449 2,899 194 1,330,245 1,229,016 (23,793) 7,847 5,632 10,798 195 1,381,248 1,231,966 149,292 5,283 5,283 5,702 196 1,397,616 1,397,616 498,432) 8,761 766 9,187	- ⊩						
187 1,221,660 1,221,660 (1,239,876) 11,658 1,056 12,672 188 1,238,160 1,070,784 167,376 3,813 346 4,150 189 1,228,010 1,070,045 161,329 4,506 4,505 5,687 190 1,289,970 779,368 510,602 3,156 3,398 3,742 191 1,299,778 1,299,777 (1,371,837) 13,588 2,314 13,883 192 1,304,556 1,163,712 64,284 9,146 1,069 11,761 193 1,326,600 744,282 582,318 2,885 1,449 2,899 194 1,330,645 1,229,016 (23,793) 7,847 5,632 10,798 195 1,337,616 1,397,616 (498,432) 8,761 766 9,187 197 1,415,027 1,414,234 (700,802) 9,734 8,977 12,807 198 1,460,220 855,360 607,860 2,914 2,913	185						·
188 1,283,160 1,070,784 167,376 3,813 3.46 4,150 189 1,282,010 1,070,045 161,329 4,506 4,505 5,687 190 1,289,970 779,368 510,602 3,156 3,398 3,742 191 1,299,778 1,299,777 (1,371,837) 13,588 2,314 13,883 192 1,304,556 1,163,712 64,284 9,146 1,069 11,761 193 1,326,600 744,282 582,318 2,885 1,449 2,899 194 1,330,245 1,229,016 (23,793) 7,847 5,632 10,798 195 1,381,248 1,231,956 149,292 5,283 5,283 5,283 5,702 196 1,397,616 1,397,616 (498,432) 8,761 766 9,187 197 1,415,027 1,414,234 (700,902) 9,734 8,977 12,807 198 1,463,202 855,360 607,860 2,914)					··	
189 1,282,010 1,070,045 161,329 4,506 4,505 5,687 190 1,289,970 779,368 510,602 3,156 3,398 3,742 191 1,299,778 1,299,778 1,299,778 1,387 13,588 2,314 13,883 192 1,304,556 1,163,712 64,284 9,146 1,069 11,761 193 1,326,600 744,282 582,318 2,885 1,449 2,899 194 1,330,245 1,229,016 (23,793) 7,847 5,632 10,798 195 1,381,248 1,231,956 149,292 5,283 5,283 5,702 196 1,397,616 1,397,616 (498,432) 8,761 766 9,187 197 1,415,027 1,414,234 (700,802) 9,734 8,977 12,807 198 1,460,844 1,238,490 (75,636) 5,772 5,586 7,049 199 1,462,202 855,360 607,860 2,914	-						
1,289,970 779,368 510,602 3,156 3,398 3,742 1,299,778 1,299,777 (1,371,837) 13,588 2,314 13,883 1,304,556 1,163,712 64,284 9,146 1,069 11,761 193 1,326,600 744,282 582,318 2,885 1,449 2,899 144 1,330,245 1,229,016 (23,793) 7,847 5,632 10,798 195 1,381,248 1,231,956 149,292 5,283 5,283 5,702 196 1,397,616 1,397,616 (498,432) 8,761 766 9,187 197 1,415,027 1,414,234 (700,802) 9,734 8,977 12,807 198 1,460,844 1,238,490 (75,636) 5,772 5,586 7,049 199 1,463,220 855,560 607,860 2,914 2,913 3,326 200 1,477,872 1,233,276 244,596 4,777 5,139 5,370 201 1,484,604 951,984 532,620 3,620 3,618 4,071 202 1,498,774 1,351,072 143,129 5,175 4,992 6,852 203 1,511,400 1,468,104 (306,240) 11,684 11,662 13,464 204 1,525,564 822,528 703,037 5,008 3,930 7,761 205 1,535,952 1,535,952 (1,061,412) 10,222 907 10,882 206 1,535,985 1,107,810 428,477 4,901 4,901 5,465 207 1,543,212 891,000 652,212 3,161 3,161 3,358 208 1,563,012 1,123,056 439,956 4,229 4,229 4,235 209 1,586,640 1,455,815 (116,556) 6,142 537 6,447 210 1,603,536 907,632 695,904 4,110 4,027 4,546 211 1,633,302 1,633,303 (577,565) 9,448 820 9,837 212 1,603,686 1,087,020 681,648 4,207 4,208 4,641 213 1,681,812 1,681,812 (991,188) 11,480 986 11,832 214 1,720,488 1,135,552 606,936 4,217 4,216 4,990 215 1,768,668 1,087,020 681,648 4,207 4,208 4,641 216 1,786,568 1,087,020 681,648 4,207 4,208 4,641 217 1,790,580 1,706,100 (302,280) 7,859 7,854 9,346 218 1,802,196 1,935,500 795,960 4,183 4,184 4,720 219 1,835,660 1,093,500 795,960 4,183 4,184 4,720 210 1,844,370 1,334,718 509,652 5,665 5,065 5,065 5,441	-						
192 1,304,556 1,163,712 64,284 9,146 1,069 11,761 193 1,226,600 744,282 582,318 2,885 1,449 2,899 194 1,330,245 1,229,016 (23,793) 7,847 5,632 10,798 195 1,381,248 1,231,956 149,292 5,283 5,283 5,702 196 1,397,616 1,397,616 (498,432) 8,761 766 9,187 197 1,415,027 1,414,234 (700,802) 9,734 8,977 12,807 198 1,460,844 1,233,490 (75,636) 5,772 5,586 7,049 199 1,463,220 855,360 607,860 2,914 2,913 3,326 200 1,477,872 1,233,276 244,596 4,777 5,139 5,370 201 1,484,604 951,984 532,620 3,620 3,618 4,071 202 1,498,774 1,351,072 143,129 5,175 4,992 <	190	1,289,970	779,368				
193 1,326,600 744,282 582,318 2,885 1,449 2,899 194 1,330,245 1,229,016 (23,793) 7,847 5,632 10,798 195 1,381,248 1,231,956 149,292 5,283 5,283 5,702 196 1,397,616 1,397,616 (498,432) 8,761 766 9,187 197 1,415,027 1,414,234 (700,802) 9,734 8,977 12,807 198 1,460,844 1,238,490 (75,636) 5,772 5,586 7,049 199 1,463,220 855,360 607,860 2,914 2,913 3,326 200 1,477,872 1,233,776 244,596 4,777 5,139 5,370 201 1,484,604 951,984 532,620 3,620 3,618 4,071 202 1,498,774 1,351,072 143,129 5,175 4,992 6,852 203 1,511,400 1,468,104 (306,240) 11,684 11,682	_ <u></u>						
194 1,330,245 1,229,016 (23,793) 7,847 5,632 10,798 195 1,381,248 1,231,956 149,292 5,283 5,283 5,702 196 1,397,616 1,397,616 (498,432) 8,761 766 9,187 197 1,415,027 1,414,234 (700,802) 9,734 8,977 12,807 198 1,460,844 1,238,490 (75,636) 5,772 5,586 7,049 199 1,463,220 855,360 607,860 2,914 2,913 3,326 200 1,477,872 1,233,766 244,596 4,777 5,139 5,370 201 1,484,604 951,984 532,620 3,620 3,618 4,071 202 1,498,774 1,351,072 143,129 5,175 4,992 6,852 203 1,511,400 1,468,104 (306,240) 11,684 11,682 13,464 204 1,525,564 822,538 703,937 5,008 3,930	- +						
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198 1,460,844 1,238,490 (75,636) 5,772 5,586 7,049 199 1,463,220 855,360 607,860 2,914 2,913 3,326 200 1,477,872 1,233,276 244,596 4,777 5,139 5,370 201 1,484,604 951,984 532,620 3,620 3,618 4,071 202 1,498,774 1,351,072 143,129 5,175 4,992 6,852 203 1,511,400 1,468,104 (306,240) 11,684 11,682 13,464 204 1,525,564 822,528 703,037 5,008 3,930 7,761 205 1,535,985 1,535,952 (1,061,412) 10,222 907 10,882 206 1,535,985 1,107,810 428,177 4,901 4,901 5,465 207 1,543,212 891,000 652,212 3,161 3,161 3,161 3,358 208 1,563,012 1,123,056 439,956 4,229	-						
199 1,463,220 855,360 607,860 2,914 2,913 3,326 200 1,477,872 1,233,776 244,596 4,777 5,139 5,370 201 1,484,604 951,984 532,620 3,620 3,618 4,071 202 1,498,774 1,351,072 143,129 5,175 4,992 6,852 203 1,511,400 1,468,104 (306,240) 11,684 11,682 13,464 204 1,525,564 822,528 703,037 5,008 3,930 7,761 205 1,535,952 1,535,952 (1,061,412) 10,222 907 10,882 206 1,535,985 1,107,810 428,177 4,901 4,901 5,465 207 1,543,212 891,000 652,212 3,161 3,161 3,358 208 1,563,012 1,123,056 439,956 4,229 4,229 4,235 209 1,586,640 1,455,815 (116,556) 6,142 537	- ⊢						
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202 1,498,774 1,351,072 143,129 5,175 4,992 6,852 203 1,511,400 1,468,104 (306,240) 11,684 11,682 13,464 204 1,525,564 822,528 703,037 5,008 3,930 7,761 205 1,535,952 1,535,952 (1,061,412) 10,222 907 10,882 206 1,535,985 1,107,810 428,177 4,901 4,901 5,465 207 1,543,212 891,000 652,212 3,161 3,161 3,358 208 1,563,012 1,123,056 439,956 4,229 4,229 4,435 209 1,586,640 1,455,815 (116,556) 6,142 537 6,447 210 1,603,536 907,632 695,904 4,110 4,027 4,546 211 1,633,302 1,633,303 (577,565) 9,448 820 9,837 212 1,650,000 1,650,000 (476,520) 8,627 759	200					5,139	5,370
203 1,511,400 1,468,104 (306,240) 11,684 11,682 13,464 204 1,525,564 822,528 703,037 5,008 3,930 7,761 205 1,535,952 1,535,952 (1,061,412) 10,222 907 10,882 206 1,535,985 1,107,810 428,177 4,901 4,901 5,465 207 1,543,212 891,000 652,212 3,161 3,161 3,358 208 1,563,012 1,123,056 439,956 4,229 4,229 4,435 209 1,586,640 1,455,815 (116,556) 6,142 537 6,447 210 1,603,536 907,632 695,904 4,110 4,027 4,546 211 1,633,302 1,633,303 (577,565) 9,448 820 9,837 212 1,650,000 1,650,000 (476,520) 8,627 759 9,108 213 1,681,812 1,681,812 (991,188) 11,480 986	_						
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205 1,535,952 1,535,952 (1,061,412) 10,222 907 10,882 206 1,535,985 1,107,810 428,177 4,901 4,901 5,465 207 1,543,212 891,000 652,212 3,161 3,161 3,358 208 1,563,012 1,123,056 439,956 4,229 4,229 4,435 209 1,586,640 1,455,815 (116,556) 6,142 537 6,447 210 1,603,536 907,632 695,904 4,110 4,027 4,546 211 1,633,302 1,633,303 (577,565) 9,448 820 9,837 212 1,650,000 1,650,000 (476,520) 8,627 759 9,108 213 1,681,812 1,681,812 (991,188) 11,480 986 11,832 214 1,720,488 1,113,552 606,936 4,217 4,216 4,990 215 1,768,668 1,087,020 681,648 4,207 4,208	-						
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208 1,563,012 1,123,056 439,956 4,229 4,229 4,435 209 1,586,640 1,455,815 (116,556) 6,142 537 6,447 210 1,603,536 907,632 695,904 4,110 4,027 4,546 211 1,633,302 1,633,303 (577,565) 9,448 820 9,837 212 1,650,000 1,650,000 (476,520) 8,627 759 9,108 213 1,681,812 1,681,812 (991,188) 11,480 986 11,832 214 1,720,488 1,113,552 606,936 4,217 4,216 4,990 215 1,768,668 1,087,020 681,648 4,207 4,208 4,641 216 1,786,554 1,786,554 (1,393,722) 15,503 1,335 16,014 217 1,790,580 1,706,100 (302,280) 7,859 7,854 9,346 218 1,802,196 1,597,992 174,240 6,456 6,456	-						
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210 1,603,536 907,632 695,904 4,110 4,027 4,546 211 1,633,302 1,633,303 (577,565) 9,448 820 9,837 212 1,650,000 1,650,000 (476,520) 8,627 759 9,108 213 1,681,812 1,681,812 (991,188) 11,480 986 11,832 214 1,720,488 1,113,552 606,936 4,217 4,216 4,990 215 1,768,668 1,087,020 681,648 4,207 4,208 4,641 216 1,786,554 1,786,554 (1,393,722) 15,503 1,335 16,014 217 1,790,580 1,706,100 (302,280) 7,859 7,854 9,346 218 1,802,196 1,597,992 174,240 6,456 6,456 7,350 219 1,835,460 1,039,500 795,960 4,183 4,184 4,720 220 1,844,370 1,334,718 509,652 5,065 5,065					·		
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213 1,681,812 1,681,812 (991,188) 11,480 986 11,832 214 1,720,488 1,113,552 606,936 4,217 4,216 4,990 215 1,768,668 1,087,020 681,648 4,207 4,208 4,641 216 1,786,554 1,786,554 (1,393,722) 15,503 1,335 16,014 217 1,790,580 1,706,100 (302,280) 7,859 7,854 9,346 218 1,802,196 1,597,992 174,240 6,456 6,456 7,350 219 1,835,460 1,039,500 795,960 4,183 4,184 4,720 220 1,844,370 1,334,718 509,652 5,065 5,065 5,441 221 1,847,604 1,109,592 738,012 4,653 4,653 4,963 222 1,848,647 1,295,316 553,331 4,963 4,908 5,227 223 1,853,280 1,830,510 (38,610) 7,870 733	_						
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217 1,790,580 1,706,100 (302,280) 7,859 7,854 9,346 218 1,802,196 1,597,992 174,240 6,456 6,456 7,350 219 1,835,460 1,039,500 795,960 4,183 4,184 4,720 220 1,844,370 1,334,718 509,652 5,065 5,065 5,441 221 1,847,604 1,109,592 738,012 4,653 4,653 4,926 222 1,848,647 1,295,316 553,331 4,963 4,908 5,227 223 1,853,280 1,830,510 (38,610) 7,870 733 8,791	215	1,768,668	1,087,020	· · · · · · · · · · · · · · · · · · ·	4,207		
218 1,802,196 1,597,992 174,240 6,456 6,456 7,350 219 1,835,460 1,039,500 795,960 4,183 4,184 4,720 220 1,844,370 1,334,718 509,652 5,065 5,065 5,41 221 1,847,604 1,109,592 738,012 4,653 4,653 4,963 222 1,848,647 1,295,316 553,331 4,963 4,908 5,227 223 1,853,280 1,830,510 (38,610) 7,870 733 8,791	-						
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220 1,844,370 1,334,718 509,652 5,065 5,065 5,441 221 1,847,604 1,109,592 738,012 4,653 4,653 4,926 222 1,848,647 1,295,316 553,331 4,963 4,908 5,227 223 1,853,280 1,830,510 (38,610) 7,870 733 8,791	ļ						
222 1,848,647 1,295,316 553,331 4,963 4,908 5,227 223 1,853,280 1,830,510 (38,610) 7,870 733 8,791	220	1,844,370	1,334,718	509,652	5,065		
223 1,853,280 1,830,510 (38,610) 7,870 733 8,791	—						
	224	1,853,341	1,086,938	766,403	3,842	348	4,178

GST	618 Customers

	Usage	Block 1 Usage	Block 2 Usage	KVA Billed	KVA Real	KVA Ratcheted
225 226	1,860,672	1,689,785	(392,964)	9,118 7,878	9,119 788	10,518 9,456
226	1,861,101 1,863,517	1,856,606 1,051,974	(381,843) 811,543	4,874	4,873	5,203
228	1,871,628	1,368,972	502,656	8,640	5,489	6,241
229	1,872,486	1,172,338	700,148	4,748	5,124	5,433
230	1,887,534	1,378,674	508,860	5,326	5,324	5,964
231 232	1,889,580 1,890,227	1,178,100 1,020,888	711,480 869,339	14,793 4,148	7,161 4,147	38,016 4,879
233	1,897,434	1,490,346	407,088	7,244	610	7,318
234	1,904,400	952,200	952,200	7,200	3,340	3,974
235	1,929,840	1,444,080	472,560	5,679	660	7,920
236	1,935,846 1,944,393	1,371,348 1,170,180	546,084	5,176 4,263	4,487 4,264	7,536 4,514
237 238	1,944,624	942,876	774,213 1,001,748	3,611	3,612	3,802
239	1,946,340	1,906,344	(146,322)	8,276	7,946	9,290
240	1,971,288	1,418,076	553,212	5,760	5,264	5,655
241	1,974,324	1,450,746	523,578	5,788	5,788	6,566
242 243	1,980,000 1,993,464	871,200 1,678,248	1,108,800 315,216	3,036 6,467	- 6,468	6,827
244	2,000,394	1,793,682	60,390	8,906	8,906	10,621
245	2,009,266	1,864,321	142,906	6,636	6,610	7,268
246	2,049,696	1,517,076	532,620	5,416	5,416	5,829
247	2,055,240	1,639,440	415,800	5,645	5,644	6,178
248 249	2,067,912 2,084,544	2,067,912 1,801,404	(1,111,176) 282,348	13,316 7,043	1,160 6,550	13,923 7,841
250	2,091,936	1,252,152	839,784	4,848	459	5,512
251	2,103,948	1,778,436	325,512	6,623	632	7,579
252	2,108,040	1,215,324	892,716	4,701	4,340	5,518
253	2,138,994	1,660,230	478,764	6,678	6,676	6,811
254 255	2,166,120 2,181,168	1,086,624 1,511,532	1,016,136 669,636	18,071 5,955	4,447 5,956	6,320 6,574
256	2,185,524	1,519,452	666,072	5,768	5,767	5,940
257	2,196,876	1,281,852	915,024	5,122	5,120	5,766
258	2,209,350	1,385,010	824,340	5,907	5,907	6,534
259	2,221,956	2,221,956	(3,624,192)	26,535	3,057	27,514
260 261	2,236,410 2,257,226	1,792,692 1,563,804	431,838 693,421	7,309 5,737	5,735	7,983 6,051
262	2,296,800	1,997,411	257,400	7,935	7,935	9,884
263	2,301,552	2,202,552	49,104	8,894	8,894	9,647
264	2,302,304	1,450,152	852,152	5,902	5,471	6,732
265 266	2,344,980 2,353,098	1,305,216 1,742,004	1,039,764 611,094	5,028 7,458	5,028 640	6,114 7,674
267	2,358,272	1,546,974	811,298	5,568	5,617	5,734
268	2,363,117	1,333,728	1,029,389	5,004	5,005	5,267
269	2,368,080	1,486,320	835,560	5,635	5,633	6,217
270	2,369,664	2,147,706	209,088	8,998	9,000	9,686
271 272	2,374,416 2,380,950	1,192,158 2,380,950	1,182,258 (1,196,514)	13,500 13,778	4,441 1,297	6,938 15,563
273	2,386,824	2,039,136	255,156	9,053	776	9,314
274	2,388,540	1,727,352	661,188	7,200	6,489	7,176
275	2,390,850	2,366,694	(374,814)	13,634	1,461	17,535
276	2,399,100	1,533,510	865,590	6,663 8,966	601	7,207
277 278	2,402,070 2,412,511	1,653,564 1,940,122	705,804 (336,364)	11,488	1,046 10,423	11,507 12,327
279	2,415,397	1,371,774	1,043,624	4,748	4,750	5,545
280	2,416,920	1,406,988	1,009,932	5,507	5,506	6,114
281	2,423,639	1,201,860	1,221,779	4,382	4,382	4,768
282 283	2,434,344 2,442,000	2,403,060 1,643,400	(129,360) 798,600	9,326 6,109	9,219 546	10,945 6,558
284	2,456,916	2,098,008	358,908	10,524	1,048	12,577
285	2,464,440	2,267,100	179,520	9,135	8,547	9,187
286	2,464,783	1,657,656	807,128	6,652	6,651	7,176
287	2,470,248	2,470,248	(833,580)	13,001	1,137	13,638
288	2,480,148 2,481,151	1,308,780 1,249,578	1,171,368 1,231,573	5,144 5,474	5,474	6,273 6,732
290	2,489,058	1,337,292	1,151,765	5,353	5,352	5,877
291	2,525,424	1,369,764	1,155,660	5,617	5,617	5,908
292	2,535,526	2,535,528	(1,060,738)	15,674	1,427	17,126
293	2,538,030	2,489,916	(118,140)	11,129 9,795	1,063	12,751 10,431
294 295	2,549,686 2,559,744	2,296,245 2,235,024	7,365 (220,176)	10,785	869 9,821	15,206
296	2,612,016	2,183,940	1,057,320	8,481	8,481	9,662
297	2,613,600	2,613,600	(594,000)	14,400	12,428	13,385
298	2,631,354	1,175,922	1,455,432	4,664	4,666	4,720
299	2,654,124	1,780,812	873,312	7,468	7,470	8,332

	Usage	Block 1 Usage	Block 2 Usage	KVA Billed	KVA Real	KVA Ratcheted
300 301	2,669,594	1,630,530	1,039,064	7,701	6,352	7,53
302	2,679,600 2,686,860	1,785,960 2,333,232	893,640 353,629	6,135 8,843	6,133 8,843	6,33 10,16
303	2,688,708	1,792,296	896,412	7,324	7,325	7,65
304	2,706,132	1,771,123	935,009	7,559	7,482	8,23
305	2,711,940	1,837,836	874,104	6,711	6,711	7,25
306 307	2,719,688	2,577,762	35,997	9,405	9,405	10,97
308	2,720,520 2,732,400	2,368,476 1,603,404	352,044 1,128,996	8,855 6,120	9,625 5,598	5,76
309	2,732,400	1,892,088	829,224	6,888	665	7,98
310	2,734,908	1,450,548	1,284,360	6,111	6,110	7,63
311	2,744,452	1,429,322	1,315,129	4,750	4,761	5,22
312	2,760,120	1,666,764	1,093,356	6,183	6,182	7,50
313	2,781,504	2,645,280	72,864	11,422	1,140	13,68
314 315	2,803,680 2,808,828	2,801,700 2,808,828	(387,288)	12,331 35,749	12,331 3,041	13,73 36,49
316	2,813,316	1,761,012	1,052,304	6,850	6,600	7,93
317	2,822,688	1,631,124	1,191,564	6,937	6,938	7,27
318	2,838,792	1,708,344	1,130,448	6,648	6,292	7,11
319	2,848,032	2,618,154	161,964	10,013	907	10,88
320	2,852,718	1,519,056	1,333,662	5,959	5,958	6,51
321 322	2,863,080 2,886,840	1,526,580 1,726,560	1,336,500 1,160,280	6,328 6,783	6,328	7,11
323	2,892,384	1,600,236	1,292,147	5,966	5,968	6,97 6,89
324	2,903,670	2,415,501	194,172	17,256	2,178	23,95
325	2,943,534	1,440,054	1,503,480	5,363	5,364	6,09
326	2,955,942	2,728,480	20,395	12,646	11,191	12,92
327	2,959,440	1,461,240	1,498,200	4,885	4,887	5,06
328 329	2,959,704 2,960,760	2,299,572 2,015,640	636,768	9,017	895	10,74
330	2,966,634	1,677,060	945,120 1,289,574	7,747 7,248	7,593 6,567	8,87 7,47
331	2,970,000	2,302,740	667,260	8,441	8,441	8,87
332	2,996,664	2,052,072	944,591	8,647	8,645	9,18
333	3,014,088	1,541,628	1,472,460	6,708	717	7,16
334	3,046,362	1,787,742	1,258,620	7,060	612	7,34
335	3,048,012	1,564,596	1,483,416	6,200	6,174	6,65
336 337	3,057,120 3,067,020	3,054,348 2,120,580	(271,339) 946,440	13,989 8,661	12,918 772	13,93 9,26
338	3,076,841	1,844,964	1,231,877	7,400	7,401	8,64
339	3,098,240	1,805,796	1,292,444	7,069	7,070	7,61
340	3,102,396	2,109,492	992,904	8,413	8,415	10,05
341	3,148,992	1,756,458	1,392,534	6,318	6,963	6,97
342 343	3,157,704 3,158,377	2,954,556 1,862,784	(236,412)	12,117	1,176	14,11
344	3,167,208	2,261,952	1,295,593 905,256	7,148 9,779	7,148	8,26 10,05
345	3,168,528	2,509,320	593,736	8,938	850	10,20
346	3,176,699	2,367,288	809,409	8,768	8,771	8,98
347	3,194,532	1,640,232	1,554,300	6,884	622	7,46
348	3,196,116	2,157,408	1,038,709	8,412	729	8,74
349 350	3,245,616 3,278,088	2,225,520 1,791,900	1,020,096	9,373	9,373	9,773
351	3,291,365	3,179,105	1,486,188 (266,770)	8,348 13,090	8,348 1,384	10,138
352	3,302,640	2,970,792	328,482	10,475	10,435	10,835
353	3,361,380	2,086,920	1,274,460	8,014	8,012	10,773
354	3,373,128	1,932,876	1,440,252	7,326	7,325	8,443
355	3,427,618	1,631,916	1,795,702	5,791	5,791	6,051
356 357	3,428,984 3,432,231	2,630,608 2,592,216	761,944 840,015	12,330 10,574	11,001	14,15
358	3,440,646	1,985,148	1,455,498	9,857	10,573 9,856	11,559 10,454
359	3,444,428	1,814,670	1,629,758	9,360	7,229	8,340
360	3,446,566	1,664,982	1,781,585	6,900	6,902	7,342
361	3,456,024	1,690,524	1,765,500	7,084	7,083	8,03:
362	3,462,360	1,780,574	1,681,786	7,361	6,683	7,66
363 364	3,465,000	3,375,900	(247,500)	15,453	1,584	19,008
365	3,501,432 3,502,356	2,684,880 1,942,380	816,552 1,559,976	7,019	7,020	13,020 7,540
366	3,552,120	1,758,240	1,793,880	6,336	6,336	6,653
367	3,555,466	2,475,792	1,079,674	8,576	8,577	9,17
368	3,619,598	2,065,932	1,553,666	7,743	7,742	8,744
369	3,635,940	1,979,604	1,656,336	7,967	7,966	8,506
370	3,636,435	3,250,500	120,450	14,232	1,252	15,028
371 372	3,644,916	3,233,604	250,404	11,823	11,335	16,489
	3,649,800 3,682,800	2,178,000 3,413,124	1,471,800 (641,520)	18,930 27,247	1,716 26,809	20,592 36,590
373						

	18 Customers) Usage	Block 1 Usage	Block 2 Usage	KVA Billed	KVA Real	KVA Ratchete
375	3,698,640	2,007,720	1,690,920	10,811	911	10,
376 377	3,708,698 3,728,360	2,361,744 3,008,016	1,346,954 720,344	9,380	9,381	10,
378	3,735,072	3,721,212	(533,412)	15,882	929 15,872	11, 18,
379	3,739,824	2,033,539	1,706,286	7,599	7,678	8,
380	3,778,434	2,292,246	1,486,188	8,522	986	9,
381	3,805,956	2,127,708	1,678,249	8,606	784	9,
382	3,859,416	2,115,828	1,743,588	7,306	673	8,
383	3,859,680	1,813,680	2,046,000	6,990	6,989	7,
384	3,886,740	2,345,112	1,541,628	10,108	10,106	10,
385 386	3,895,056 3,911,160	3,773,088	(654,984)	18,796	18,683	21,
387	3,963,432	2,166,120 2,592,216	1,745,040 1,371,216	8,050 9,600	8,051 898	8, 10,
388	3,963,564	3,365,604	597,960	14,164	13,999	16,
389	3,963,841	2,351,448	1,612,393	9,359	9,354	10,
390	3,972,276	2,484,108	1,488,168	8,895	8,763	10,:
391	3,973,424	2,321,352	1,652,073	8,860	8,855	9,
392	3,987,324	3,010,392	976,932	12,256	1,069	12,8
393	3,998,016	2,333,232	1,664,784	9,043	9,045	9,4
394	4,035,240	2,254,824	1,780,416	7,924	737	8,8
395 396	4,064,148	2,367,684	1,696,464	10,016	10,015	10,5
397	4,070,484 4,145,064	3,545,586 2,309,868	524,898 1,835,196	12,319 8,645	1,119 781	13,4
398	4,172,850	2,484,702	1,688,148	10,062	10,144	10,8
399	4,197,996	2,359,606	1,838,390	8,711	8,617	9,8
400	4,221,954	2,847,636	1,374,318	10,488	1,255	15,0
401	4,229,676	2,610,155	1,619,521	11,091	10,118	11,5
402	4,237,002	2,959,902	1,277,100	10,754	950	11,4
403	4,260,960	2,073,060	2,187,900	9,122	8,055	8,7
404	4,263,943	2,362,140	1,901,803	8,057	8,057	9,5
405	4,267,534	3,454,704	1,534,738	15,120	12,482	13,7
406 407	4,278,978 4,280,760	2,159,784 2,546,280	2,119,194 1,734,480	8,096 8,737	1,657 774	8,2 9,2
408	4,305,352	2,233,440	2,071,912	8,971	8,969	10,2
409	4,313,628	3,710,916	585,684	12,273	1,137	13,6
410	4,322,340	2,561,922	1,760,418	10,064	10,062	12,3
411	4,330,458	2,845,260	1,485,198	10,043	9,985	13,3
412	4,353,228	2,330,856	2,022,372	9,060	9,060	9,7
413	4,403,124	2,593,404	1,809,720	9,891	9,892	10,6
414 415	4,428,072 4,438,962	2,348,676	2,079,396	8,911	8,910	9,5
416	4,445,694	2,364,714 2,471,812	2,074,248 1,973,882	11,384 9,174	11,383 9,245	16,8 9,7
417	4,496,580	3,534,300	962,280	13,866	13,864	14,8
418	4,543,110	2,770,818	318,975	21,555	16,099	29,4
419	4,547,664	2,625,876	1,921,788	10,874	919	11,0
420	4,572,612	3,775,464	1,807,740	14,806	14,806	16,0
421	4,580,928	2,689,632	1,891,296	9,686	9,686	10,3
422	4,584,096	3,110,184	1,473,912	11,499	11,500	11,8
423 424	4,661,712 4,688,904	3,304,422 3,204,392	1,357,290 1,484,512	14,400	12,953 13,332	13,5 14,3
425	4,699,068	2,857,932	1,841,136	11,351	11,351	14,5
426	4,699,332	2,645,676	2,053,656	19,783	9,845	12,1
427	4,719,660	2,665,080	2,054,580	14,400	13,213	13,8
428	4,792,524	2,577,208	2,215,316	9,550	9,624	10,1
429	4,811,796	4,328,280	476,784	16,375	16,375	17,8
430	4,842,856	2,574,000	2,268,856	8,786	8,787	9,5
431	4,879,512	4,156,812	722,700	17,210	17,210	19,1
432 433	4,894,428	2,702,304	2,192,124	10,747	10,747	12,0
434	4,908,420 4,934,160	3,204,828 4,039,200	1,703,592 883,080	13,041 14,057	13,043 14,058	14,7 15,0
435	4,944,271	3,046,824	1,897,447	12,422	1,094	13,1
436	4,957,590	3,909,840	811,470	17,351	17,101	21,5
437	4,998,470	3,675,672	1,322,800	14,276	1,331	15,9
438	5,018,389	3,294,324	1,724,065	13,337	13,337	17,1
439	5,037,001	3,183,840	1,853,161	12,587	12,452	13,3
440	5,044,486	2,992,572	2,051,914	11,056	11,056	12,7
441	5,058,900	2,946,240	2,112,660	10,125	10,124	10,6
442	5,144,040	3,964,356	1,179,684	14,034	1,279	15,3
443	5,169,780 5,177,304	2,898,720	2,271,060	9,670	9,670	10,2
444	5,177,304	3,473,712 2,587,464	1,703,592 2,641,320	14,319 9,756	1,243 9,389	14,9
446	5,266,800	3,302,640	1,964,160	12,991	1,274	15,2
447	5,276,700	4,605,876	670,824	15,633	1,370	16,4
448	5,283,175	2,936,736	2,346,439	11,083	11,082	11,9
449	5,351,280	3,848,460	1,478,400	21,566	20,513	25,8

GST	(618 Customers

	Usage	Block 1 Usage	Block 2 Usage	KVA Billed	KVA Real	KVA Ratcheted
450	5,351,940	3,367,980	1,983,960	13,857	13,856	15,634
451 452	5,549,940 5,562,480	2,999,700 5,079,360	2,550,240 (1,648,680)	10,671 32,172	10,670 31,997	11,405 46,094
453	5,598,252	3,495,096	2,103,156	13,696	13,694	14,779
454	5,652,900	3,201,660	2,451,240	10,930	931	11,167
455	5,676,000	2,613,600	3,062,400	9,681	9,682	10,217
456	5,687,352	3,675,276	2,012,076	13,881	13,880	14,826
457 458	5,700,024 5,709,132	4,431,240 2,851,200	1,268,784 2,857,932	18,990 11,409	1,699 11,409	20,386 13,116
459	5,728,800	3,900,600	1,828,200	15,022	15,022	17,424
460	5,807,340	3,479,652	2,327,688	13,603	13,603	15,729
461	5,823,840	5,730,450	(183,480)	22,514	22,480	28,037
462	5,873,551	3,548,556	2,324,995	14,279	14,280	15,396
463 464	5,928,991 5,929,440	5,640,307 3,463,020	163,627 2,466,420	19,750 14,099	19,531 14,098	23,095 15,404
465	5,939,604	5,012,964	917,928	20,245	20,244	22,762
466	5,962,176	5,005,440	948,817	17,380	17,380	19,198
467	5,984,352	5,005,044	979,308	19,128	1,893	22,715
468	6,119,024	4,405,104	1,713,920	18,306	18,305	20,765
469 470	6,128,628 6,214,600	3,389,760 3,315,312	2,738,868 2,899,288	16,560 12,776	12,791 12,776	13,464 13,527
471	6,219,576	3,572,910	2,646,666	14,629	14,630	15,278
472	6,242,346	4,172,850	2,069,496	15,578	15,579	17,345
473	6,250,068	3,664,148	2,585,920	14,596	14,711	17,297
474	6,334,812	4,473,889	1,860,923	18,316	18,335	24,520
475 476	6,349,068 6,384,840	3,024,648 3,981,780	3,324,420 2,403,060	12,514 15,274	1,441 15,272	14,414
477	6,400,020	3,227,400	3,172,620	12,461	12,461	15,959 13,068
478	6,543,504	3,935,844	2,607,660	13,655	1,386	15,246
479	6,553,206	3,597,977	2,955,229	14,075	14,199	14,969
480	6,566,472	5,162,533	1,212,156	28,871	2,471	29,652
481	6,602,112	3,676,939	2,590,236	16,920	16,921	18,818
482 483	6,671,174 6,677,352	4,552,416 5,172,552	2,118,758 1,504,800	18,369 19,380	18,370 19,341	20,053
484	6,713,520	5,928,120	745,800	21,087	21,087	23,285
485	6,763,350	3,867,930	2,895,420	15,452	15,451	16,474
486	6,767,323	4,479,948	2,287,375	17,943	1,806	21,669
487	6,770,056	5,641,416	1,115,176	22,039	2,166	25,993
488 489	6,815,160 6,822,684	3,809,916 4,557,168	3,005,244 2,265,516	20,670 16,679	14,719 1,608	15,634 19,293
490	6,877,200	4,922,280	1,954,920	16,592	1,584	19,008
491	6,878,995	4,280,958	2,598,037	17,891	1,592	19,103
492	6,897,000	4,379,100	2,517,900	15,212	1,399	16,790
493 494	6,957,324	3,755,268	3,202,056	14,148	14,149 14,975	15,016
495	6,996,660 7,003,656	3,783,780 4,523,904	3,212,880 2,479,752	14,975 17,902	17,903	15,840 21,384
496	7,072,560	3,970,771	3,101,789	14,642	14,755	15,682
497	7,132,554	3,403,066	3,729,488	13,347	12,143	12,807
498	7,145,820	4,215,024	2,930,796	17,369	1,477	17,725
499 500	7,389,756 7,398,468	3,630,528 5,057,316	3,759,228	16,945	1,513	18,153
501	7,405,596	3,653,100	2,341,152 3,752,496	18,616 12,835	18,616 12,834	20,053 13,710
502	7,423,020	4,264,524	2,782,692	19,037	19,038	21,384
503	7,502,880	4,596,662	2,871,264	15,752	1,492	17,899
504	7,599,680	4,113,120	3,486,560	16,121	16,122	20,064
505 506	7,651,868 7,692,498	4,071,870 4,204,332	3,579,998 3,488,166	15,324 17,229	1,523 17,230	18,271 21,028
507	7,769,718	5,022,686	2,747,032	17,229	17,230	18,208
508	7,789,980	4,488,660	3,301,320	15,580	1,412	16,949
509	7,902,418	5,430,348	2,472,071	21,450	21,451	23,712
510	7,914,720	6,587,460	1,327,260	22,730	22,730	26,374
511 512	7,949,368 7,973,262	7,170,483 5,824,427	648,395 2,102,760	30,575 21,726	3,089 1,956	37,068 23,475
513	8,091,864	4,722,300	3,369,564	18,999	19,000	22,192
514	8,132,850	4,584,690	3,548,160	16,647	16,645	18,810
515	8,154,630	4,610,430	3,544,200	15,797	1,416	16,988
516	8,478,030	6,648,510	1,617,330	26,823	26,166	37,224
517 518	8,590,098 8,705,228	7,290,360 4,307,688	1,299,738 4,397,540	28,736 15,778	28,736 15,777	33,660 16,347
519	8,961,480	7,444,800	1,180,080	32,561	26,611	36,115
520	9,006,228	4,781,700	4,224,528	18,671	18,671	19,008
521	9,112,917	5,959,800	3,071,937	22,341	22,341	24,552
522	9,151,560	7,349,760	1,750,320	37,728	27,680	36,115
523 524	9,184,428 9,193,800	4,771,008 5,211,360	4,413,420 3,982,440	17,370 18,788	1,802 1,723	19,820 20,671
224L	טטס,ככד,כ	J,Z11,30U	3,302,440	10,/00	1,723	20,671

GST	1540 6 1
(7 7 1	(618 Customer

_	Usage	Block 1 Usage	Block 2 Usage	KVA Billed	KVA Real	KVA Ratcheted
525			1,366,200	27,649	27,649	
526			4,646,268	17,410	17,099	
527			4,492,621	20,629	1,841	22,097
528 529			1,815,330 4,641,516	30,730 19,864	30,730 19,863	34,175 21,954
530			4,732,200	17,655	1,551	18,612
531			4,292,640	19,290	1,703	20,434
532	9,645,847	8,375,994	1,269,854	32,779	32,779	39,917
533			2,708,640	25,404	2,245	26,944
534			3,632,112	22,480	1,996	23,950
535			4,441,800	23,304	23,305	23,760
536 537		6,926,040 4,712,796	3,023,460 5,253,930	23,721 15,761	23,720 15,763	27,562 16,394
538		7,543,800	2,593,800	26,604	25,898	33,264
539		6,870,600	3,319,470	23,547	2,016	24,196
540		5,292,540	5,000,596	20,076	20,076	21,051
541	10,304,712	5,577,660	4,727,052	19,060	19,059	20,434
542	<u> </u>	6,700,980	3,357,948	26,926	26,928	30,096
543 544		5,365,800	5,344,614	20,526	20,526	21,463
545	10,772,520 10,835,946	6,684,480 7,211,160	4,088,040 3,624,786	23,457 24,655	2,033 2,412	24,394 28,948
546	10,867,989	5,336,100	5,531,889	20,624	20,622	20,948
547	10,876,800	5,480,640	5,396,160	20,905	20,909	22,810
548	10,948,080	5,757,840	5,190,240	23,085	23,087	24,394
549	10,983,456	5,691,708	5,291,748	22,901	22,901	23,712
550	11,056,320	6,368,868	4,687,452	22,125	2,158	25,898
551 552	11,198,220 11,427,768	9,054,540	2,143,680	34,028	34,030	39,758
553	11,427,768	6,738,336 5,520,636	4,689,432 5,960,790	24,276 21,342	2,111 21,342	25,328 21,740
554	11,582,340	5,779,620	5,802,720	24,466	24,466	25,819
555	11,712,360	6,450,840	5,261,520	23,746	2,086	25,027
556	11,860,596	6,128,892	5,731,704	23,975	23,974	25,993
557	11,911,680	6,801,300	5,110,380	24,731	2,152	25,819
558	11,967,780	7,617,060	4,350,720	28,504	28,505	32,710
559 560	11,990,880	6,987,816	5,003,064	25,141	2,439	26,833
561	12,193,896 12,286,560	6,252,840 6,674,580	5,941,056 5,611,980	22,308 26,797	2,006 2,323	24,077 27,878
562	12,309,600	8,824,800	3,484,800	34,520	3,040	36,480
563	12,345,960	9,252,540	3,093,420	36,122	3,122	37,462
564	12,411,960	8,252,640	4,159,320	29,621	2,614	31,363
565	12,515,580	10,686,258	1,829,322	42,869	4,158	49,896
566	12,670,614	6,638,940	6,031,674	24,454	2,132	25,582
567 568	13,174,920 13,197,360	6,534,000 6,874,560	6,640,920 6,322,800	25,462	25,463	26,611
569	13,349,160	7,163,640	6,185,520	26,042 25,384	2,402 2,178	28,829 26,136
570	13,395,096	7,468,956	5,926,140	26,969	2,507	30,080
571	13,688,015	7,600,800	6,087,215	28,218	28,218	32,544
572	14,019,720	9,109,980	4,909,740	31,226	2,825	33,898
573	14,256,660	6,904,260	7,352,400	28,751	28,750	33,739
574 575	14,397,240 14,454,000	8,698,140	5,699,100 1,338,480	32,372	32,366	35,640
576	14,434,000	12,885,840 7,553,040	7.164.960	50,198 26,461	4,435 26.836	53,222 28,908
577	14,840,179	7,422,624	7,417,556	27,994	27,993	29,130
578	14,945,832	7,694,676	7,251,156	27,604	2,566	30,793
579	15,371,400	11,167,200	4,204,200	45,051	43,481	48,470
580	15,635,598	8,246,700	7,388,898	27,944	27,944	30,096
581	15,638,357	8,740,116	6,898,241	30,471	2,661	31,933
582 583	15,729,912 15,865,740	9,149,976 8,191,260	6,579,936 7,674,480	32,640 28,137	3,018 · 2,534	36,210 30,413
584	16,017,606	9,007,020	7,010,586	36,491	36,491	40,392
585	16,369,980	8,539,740	7,830,240	31,614	2,752	33,026
586	16,472,280	9,579,240	6,893,040	38,715	3,419	41,026
587	16,577,748	8,456,184	8,121,564	31,716	2,883	34,595
588	16,745,520	11,086,020	5,659,500	51,844	4,488	53,856
589	17,494,224	11,466,180	6,028,044	38,743	3,604	43,243
590 591	17,829,240 18,417,300	9,072,360 9,175,320	8,756,880 9,241,980	31,375	2,917	35,006
592	18,846,300	9,989,100	8,857,200	31,099 38,710	2,818 38,709	33,818 40,550
593	19,011,440	13,408,800	5,173,040	49,114	47,888	64,128
594	19,539,300	10,122,750	9,416,550	36,161	3,165	37,976
595	19,648,200	13,412,520	6,235,680	46,563	4,059	48,708
596	20,371,560	11,777,040	8,594,520	52,931	5,049	55,539
597	20,848,080	10,561,320	10,286,760	36,062	3,643	40,075
598	21,049,380	11,862,180	9,187,200	44,058	4,072	48,866
599	21,234,180	11,060,280	10,173,900	37,086	3,201	38,412

GST	(C10 C
COL	(618 Customers

	Usage	Block 1 Usage	Block 2 Usage	KVA Billed	KVA Real	KVA Ratcheted
600	21,527,880	10,715,760	10,812,120	41,382	41,382	43,402
601	22,459,140	11,307,780	11,151,360	39,602	3,551	42,610
602	24,408,120	11,658,240	12,749,880	44,287	3,815	45,778
603	24,636,480	12,359,160	12,277,320	50,246	50,246	57,895
604	25,773,000	14,093,640	11,679,360	57,645	57,644	61,776
605	26,929,980	14,054,040	12,875,940	53,856	5,801	69,617
606	27,205,596	16,457,760	10,747,836	57,843	5,141	61,697
607	27,730,560	14,291,640	13,438,920	53,090	4,646	55,757
608	29,734,056	15,024,636	14,709,420	51,745	51,745	56,454
609	31,633,800	16,600,320	15,033,480	56,785	56,786	63,677
610	33,348,480	19,879,200	13,469,280	75,358	75,359	77,933
611	34,721,280	24,334,200	10,387,080	95,143	95,146	110,246
612	35,240,370	17,201,250	18,039,120	64,863	5,874	70,488
613	42,645,900	20,267,280	22,378,620	77,690	7,663	84,289
614	44,241,696	21,614,940	22,626,756	78,812	7,142	85,698
615	52,123,434	26,528,040	25,595,394	99,527	99,528	106,128
616	58,674,924	24,599,520	34,075,404	86,366	86,368	88,229
617	63,323,370	34,848,825	28,474,545	131,885	128,816	139,986
618	67,725,721	31,153,043	36,572,680	119,360	119,360	127,226

CONFIDENTIAL - FOR COMMISSION EYES ONLY

No. CEPR-AP-2015-0001 Schedule H-5 SUPP.

TOU-P (1 Customer)

usage	on peak	off peakk	kVa on peak	kVA off peak
7,628,610	3,202,320	4,426,290	20,276	20,853

TOU-T (21 Customers)

usage	on peak	off peak	kVa on peak	kVa off peak
395,340	145,800	250,140	2,389	2,428
5,171,100	1,976,700	3,194,400	9,406	9,134
5,466,120	2,071,080	3,395,040	9,906	9,505
5,466,120	2,071,080	3,395,040	9,906	9,505
5,735,565	2,254,725	3,480,840	13,443	12,438
9,076,800	1,550,400	7,526,400	151,399	200,280
15,075,654	6,085,266	8,990,338	28,037	26,928
15,122,580	5,742,000	9,380,580	29,734	29,773
17,418,639	7,321,034	10,097,605	36,180	35,076
24,222,000	9,488,160	14,733,840	40,648	39,270
28,170,120	11,663,520	16,506,600	57,289	53,604
28,408,380	8,691,540	19,716,840	64,641	65,643
38,125,494	10,877,130	27,248,364	120,517	139,156
41,057,514	16,169,096	24,888,418	71,875	69,299
41,057,514	16,169,096	24,888,418	71,875	69,199
41,136,017	15,914,907	25,221,110	83,899	80,025
42,758,760	16,944,840	25,813,920	76,032	73,234
49,332,360	19,522,200	29,743,560	88,967	83,954
50,581,080	19,930,680	30,650,400	88,665	86,169
64,379,304	25,004,892	39,374,412	111,896	108,543
95,439,960	36,378,540	59,061,420	170,895	165,586

CONFIDENTIAL - FOR COMMISSION EYES ONLY

No. CEPR-AP-2015-0001 Schedule H-5 SUPP.

LIS (2 Customers)

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usage	kVa Max		·
5,528,050	17,733		
1,088,413	20.495		•••

CONFIDENTIAL - FOR COMMISSION EYES ONLY

No. CEPR-AP-2015-0001 Schedule H-5 SUPP.

TOU-P (1 Customer)

usage	on peak	off peakk	kVa on peak	kVA off peak
7,628,610	3,202,320	4,426,290	20,276	20,853

Puerto Rico Electric Power Authority Plan of Administration Subsidy Adjustmentⁱⁱⁱ

Purpose

The purpose of the subsidies, public lighting (municipal) and other subventions rider is to recover all expenses associated with sanctioned subsides which are provided to the customers of the Puerto Rico Electric Power Authority. Examples of fuel expenses include but are not limited to the following:

- · Residential assistance tariffs
- Subsidized public lighting
- Assistance to agricultural customers
- Other programs required by the Government of Puerto Rico
- Programs sanctioned by the Puerto Rico Energy Commission
- Cash Working Capital associated with fuel expenses

Operation of the SUBA Mechanism

The SUBA mechanism will be a fully reconciling balancing account which will allow PREPA to recover all fuel expenses and working capital. The mechanism will operate quarterly on a forward looking basis and reconcile the previous forecasts to actual operating results.

The SUBA will reconcile all costs associated with subsidies. The reconciliation of the prior period fuel expenses will be performed as follows:

- A comparison of the estimated versus actual fuel expenses for the first two months of the first prior period
- A reconciliation of the third month of the estimated versus actual fuel expenses for the third month of second prior period.

Every month PREPA shall be required to provide to the PREC a re-estimate of the recovery of subsidy expenses. If the projected recovery differs more than 10 percent based upon current information PREPA shall provide a request to the PREC detailing a recalculated SUBA which if approved shall go into effect the first billing cycle of the following month.

Proposed Review by the PREC

PREPA will annually provide a filing detailing the fuel procurement strategy and planning for regulatory review. After PREC's approval the strategy will be implemented and a quarterly filing will be provided no later than the second week and the third month which will be placed into effect for all bills rendered during the following quarter.

The Subsidies Adjustment can be found in the PREPA Tariff Book (Schedule J-1) on Pages 55-56.

[&]quot;The Subsidies Adjustment can be found on Pages 10-12 of PREPA Ex. 4.0.

Puerto Rico Electric Power Authority Plan of Administration Load Retention Rideriii

Purpose

The purpose of the Load Retention rider is to avoid non-economic bypass of electric load from customers who could potentially replace PREPA via alternative energy sources in those cases where the customer's energy alternative is more expensive than PREPA's marginal cost.

Operation of the Load Retention Rider

A discount will be offered to the customer based upon a study performed by PREPA which will compare PREPA's marginal cost to the cost of the customer's alternate electric service. The Load Retention discount would be calculated as PREPA's marginal cost less the offered alternatives cost. If the cost of the customer's energy alternative is greater than PREPA's tariffed rates no discount will be offered.

Proposed Review by the PREC

When an agreement is completed by PREPA and the customer, a filing shall be made before the PREC. Any customer specific information shall be confidential. The PREC shall have sixty (60) days to rule on the application and either approve or disapprove the agreement. If the contract is approved PREPA shall execute the agreement. If the PREC does not approve the agreement no discount will be offered to the customer.

Recovery of Discount

If the PREC approves a specific contract it will be deemed to be prudent and the discount will be recovered through the subsidy rider.

ⁱ The Load Retention Rider can be found in the PREPA Tariff Book (Schedule J-1) on Page 57. ⁱⁱ The Load Retention Rider can be found on Page 36 of PREPA Ex. 4.0.

Puerto Rico Electric Power Authority Plan of Administration Economic Development Riderⁱⁱⁱ

Purpose

The purpose of the Economic Development rider is to incentivize businesses to expand within the Commonwealth of Puerto Rico through discounted electric service from PREPA.

Operation of the Economic Development Rider

The level of discount provided through the Economic Development Rider will be open to negotiation between PREPA and the customer, and should be determined by the employment created, as well as the cost PREPA incurs serving the required load.

Proposed Review by the PREC

When an agreement is completed by PREPA and the customer, a filing shall be made before the Puerto Rico Energy Commission. Any customer specific information shall be confidential. The PREC shall have sixty (60) days to rule on the application and either approve or disapprove the agreement. If the contract is approved PREPA shall execute the agreement.

The Economic Rider can be found on Pages 35-36 of PREPA Ex. 4.0.

The Economic Rider can be found in the PREPA Tariff Book (Schedule J-1) on Page 58.

Puerto Rico Electric Power Authority Plan of Administration Fuel Cost Adjustmentⁱⁱⁱ

Purpose

The purpose of the Fuel Cost Adjustment (FCA) is to recover all expenses associated with fuel consumed by PREPA's electric generating units. Examples of fuel expenses include but are not limited to the following:

- No. 6 fuel oil
- No. 2 fuel oil
- Diesel
- Propane
- Natural Gas
- Fuel Taxes
- Handling and Storage Charges
- Cash Working Capital associated with fuel expenses

Operation of the FCA Mechanism

The FCA mechanism will be a fully reconciling balancing account which will allow PREPA to recover all fuel expenses and working capital. The mechanism will operate quarterly on a forward looking basis and reconcile the previous forecasts to actual operating results.

The FCA will reconcile that portion of the fuel expense that resides in base rates as well as that portion that resides outside of base rates. As is currently proposed the average cost of fuel in base rates is \$XXX/KWH for FY2017.

The reconciliation of the prior period fuel expenses will be performed as follows:

- A comparison of the estimated versus actual fuel expenses for the first two months of the first prior period
- A reconciliation of the third month of the estimated versus actual fuel expenses for the third month of second prior period.

Every month PREPA shall be required to provide to the PREC a re-estimate of the recovery of fuel expenses. If the projected recovery differs more than 10 percent based upon current information PREPA shall provide a request to the PREC detailing a recalculated FCA which if approved shall go into effect the first billing cycle of the following month.

Proposed Review by the PREC

PREPA will annually provide a filing detailing the fuel procurement strategy and planning for regulatory review. After PREC's approval the strategy will be implemented and a quarterly filing will be provided no later than the second week and the third month which will be placed into effect for all bills rendered during the following quarter.

The Fuel Cost Adjustment can be found in the PREPA Tariff Book (Schedule J-1) on Pages 49-50. The Fuel Cost Adjustment can be found on Pages 4-10 of PREPA Ex. 4.0.

Puerto Rico Electric Power Authority Plan of Administration Purchased Power Cost Adjustmentⁱⁱⁱ

Purpose

The purpose of the Purchased Power Cost Adjustment (PPCA) is to recover all expenses associated with purchased power agreements. Examples of purchased power agreements include but are not limited to the following:

- AES Coal Project
- Ecoelecticia Combined Cycle Generating Station
- · Other utility scale
- · Taxes associated with purchased power payments
- Cash Working Capital associated with purchased power expenses

Operation of the PPCA Mechanism

The PPCA mechanism will be a fully reconciling balancing account which will allow PREPA to recover all purchased power expenses and working capital. The mechanism will operate quarterly on a forward looking basis and reconcile the previous forecasts to actual operating results.

The PPCA will reconcile that portion of the purchased power expense that resides in base rates as well as that portion that resides outside of base rates. As is currently proposed the average cost of purchased power in base rates is \$XXX/KWH for FY2017.

The reconciliation of the prior period purchased power expenses will be performed as follows:

- A comparison of the estimated versus actual purchased power expenses for the first two months of the first prior period
- A reconciliation of the third month of the estimated versus actual purchased power expenses for the third month of second prior period.

Every month PREPA shall be required to provide to the PREC a re-estimate of the recovery of purchased power expenses. If the projected recovery differs more than 10 percent based upon current information PREPA shall provide a request to the PREC detailing a recalculated PPCA which if approved shall go into effect the first billing cycle of the following month.

Proposed Review by the PREC

PREPA will annually provide a filing detailing the purchased power procurement strategy and planning for regulatory review. After PREC's approval the strategy will be implemented and a quarterly filing will be provided no later than the second week and the third month which will be placed into effect for all bills rendered during the following quarter.

¹ The Purchased Power Cost Adjustment can be found in the PREPA Tariff Book (Schedule J-1) on pages 51-52.

ii The Purchased Power Cost Adjustment can be found on pages 4-10 of PREPA Ex. 4.0

Puerto Rico Electric Power Authority Plan of Administration Rider to Recover the Costs of Energy Efficiency and Conservation Programsⁱⁱⁱ

Purpose

The purpose of this rider is to collect the investments and expenses associated with energy efficiency and Demand Side Management implemented in Puerto Rico

Administration of Programs

At this time the administration of programs has not been determined

Development of Program Budgets

At this time the development of program budgets have not been determined

Operation of the Rider

Given PREPA's weak financial condition the expenditures for Energy Efficiency and Demand Side Management programs would need to be financed in advance of the incurrence of program costs. Therefore, a quarterly forecast of expenditures would be developed and a per KWH adjustment factor would be calculated based upon the projected budgeted expenditures and the projected KWH sales that quarter.

The funds collected by the rider would be segregated from PREPA's general revenues avoiding co-mingling of the funds. The funds would specifically be targeted to Energy Efficiency and Demand Side Management expenses and investments.

Proposed Review by the PREC

All calculations and budgets would be provided to the PREC for review in advance of inclusion in customer's bills.

¹ The Energy Efficiency Rider can be found in the PREPA Tariff Book (Schedule J-1) on Pages 59-60.

[&]quot;The Energy Efficiency Rider can be found on Page 37 of PREPA Ex. 4.0.

Puerto Rico Electric Power Authority Plan of Administration Fuel Oil Subsidyⁱⁱⁱ

Purpose

The purpose of the Fuel Oil Subsidy rider is to provide subsidized costs of fuel for select low usage residential customers served by PREPA.

Operation of the Fuel Oil Mechanism

The Fuel Oil mechanism will apply to the first 425 kWh usage by the appropriate customers, applied at a rate of 34%.

Proposed Review by the PREC

PREPA shall make a filing for a proposed Fuel Oil Subsidy before the end of the eleventh month of each annual time period with the PREC which will be proposed to go into effect with the first billing cycle of the first month of the annual time period.

The Fuel Oil subsidy rider can be found on Pages 37-38 of PREPA Ex. 4.0.

ⁱ The Fuel Oil Subsidy rider can be found on Page 61 the PREPA Tariff Book (Schedule J-1).

Puerto Rico Electric Power Authority Plan of Administration Contributions in Lieu of Taxes Adjustmentⁱⁱⁱ

Purpose

The purpose of the Contributions in Lieu of Taxes Adjustment (CILTA) rider is to recover all expenses associated with compensation paid to municipalities by PREPA in lieu of property taxes. Examples of these expenses include but are not limited to the following:

- Residential assistance tariffs
- Subsidized public lighting
- Assistance to agricultural customers
- Other programs required by the Government of Puerto Rico
- Programs sanctioned by the Puerto Rico Energy Commission
- · Cash Working Capital associated with funding of subsidies or CILT.

Operation of the CILTA Mechanism

The CILTA mechanism will be a fully reconciling balancing account which will allow PREPA to recover all fuel expenses and working capital. The mechanism will operate annually on a forward looking basis and reconcile the previous forecasts to actual operating results.

The CILTA will reconcile all costs associated with contributions in lieu of taxes.

Proposed Review by the PREC

PREPA shall make a filing for a proposed CILTA factor before the end of the eleventh month of each annual time period with the PREC which will be proposed to go into effect with the first billing cycle of the first month of the annual time period. If a revised CILTA factor is not approved the previous years' CILTA factor shall remain in effect until a new factor is approved.

¹ The CILTA rider can be found in the PREPA Tariff Book (Schedule J-1) on Pages 53-54.

[&]quot;The CILTA rider can be found on Pages 10-12 of PREPA Ex. 4.0.

ENERGY EFFICIENCY RIDER

The Energy Efficiency Rider is a mechanism which provides for the cost recovery for all expenses associated with the implementation and administration of energy efficiency programs operated by or on behalf of PREPA. The costs of the program shall be recovered through a per kilowatthour charge for all customers, the Energy Efficiency Charge (EEC).

The formula to calculate the EEC is:

$$ECC (\$/kWh) = (\frac{TotalCostofEnergyEfficiency Programs}{TotalGross RetailKWHSales})$$

Given PREPA's weak financial condition the expenditures for Energy Efficiency and Demand Side Management programs would need to be financed in advance of the incurrence of program costs. Therefore, a quarterly forecast of expenditures would be developed and a per KWH adjustment factor would be calculated based upon the projected budgeted expenditures and the projected KWH sales that quarter.

The funds collected by the rider would be segregated from PREPA's general revenues avoiding co-mingling of the funds. The funds would specifically be targeted to Energy Efficiency and Demand Side Management expenses and investments.

Absent information to the contrary it is assumed that all customer classes will benefit equally from energy efficiency investments. Therefore, all csuotmers will contribute equally on a \$/KWH basis to pay for these programs. If after the programs have been determined evidence exists that customer classes classes benefit hav a differential level of benefits form energy efficiency programs a more detailed approach to cost allocation may be proposed.

The ECC factor shall be calculated quarterly.

Total Cost Energy Efficiency Programs

The total cost of energy efficiency programs administered by or on behalf of PREPA which are approved by the Puerto Rico Energy Commission.

At this time the development of program budgets have not been determined.

Prior Period Reconciliation

The Prior Period Reconciliation is the under- or over-recovered funds for the first two months of the current quarterly time period and the last month of the prior quarterly time period. PREPA shall provide estimates of the reconciling balance with each proposed quarterly filing of the FCA.

Total Gross Retail Sales

Total Net Retail Sales shall be the sales to all classes of classes including Net Metering Energy.

Working Capital

The estimated level of working capital based upon the Revenue Lags approved in the most recent general rate requests and the expense leads, by fuel type, as documented by PREPA.

Quarterly Filing

PREPA shall make a filing for a proposed FCA factor before the end of the second week of the third month of each quarter with the PREC which will be proposed to go into effect with the first billing cycle of the first month of the following quarter. If a revised FCA factor is not approved the previous months' FCA factor shall remain in effect until a new factor is approved.

Accelerated Adjustment

Each month after final Fuel Expense and KWH sales are available to PREPA the company shall prepare a re-estimate comparing the re-estimated recovery of fuel expense for the quarterly period. If the re-estimated fuel expense deviated from the estimated fuel expenses by more than five (5) percent PREPA shall re-estimate the Fuel Cost Adjustment factor to provide an expected value of zero for the quarterly time period.

Puerto Rico Electric Power Authority Request re Schedule J-5 Revenue Decoupling Mechanism

Request

PREPA witness Hemphill's testimony (Ex. 7.0) discusses a Formula Rate Mechanism. This does not appear to describe a decoupling mechanism, but instead only references the Formula Rate Plan proposed by PREPA.

Response

PREPA has requested the implementation of a Formula Rate Mechanism (FRM) in the current rate proceeding. However, decoupling mechanisms are typically also formulaic and the particular FRM propose by PREPA also is a decoupling mechanism, implicitly decoupling revenues from sales volume. An additional external revenue decoupling mechanism will not be required for the following reasons:

- The FRM will reconcile to a targeted "return" defined by the Debt Service Coverage Ratio.
 - o If the revenues received in a specific year exceeded the revenue requirement, an adjustment will be made in the following year to reduce base rate charges to eliminate the over-recovery of the revenue requirement.
 - If the revenues received in a specific year are below the revenue requirement, an adjustment will be made in the following year to increase base rate charges to eliminate the under-recovery of the revenue requirement.
- The FRM addresses impacts on the Debt Service Coverage Ratio from variations in revenues or expenses
 - If the level of revenues exceeds the level forecast in the test year and the balance of the revenue requirement remains equal to forecast an over-recovery of revenue requirement will occur. The over-recovery will be used to offset the following years' revenue requirement.
 - If the level of revenues is below the level forecast in the test year and the balance of the revenue requirement remains equal to forecast an under-recovery of revenue requirement will occur. The under-recovery will be offset in the following years' revenue requirement.
- The annual FRM process updates the billing determinates each year.

As a result, aggregate revenues (i.e., the total revenue collected in response to the calculated and approved aggregate revenue requirement of PREPA) are rendered independent of, and decoupled from, sales volumes. The FRM mechanism thus contains the elements of, and constitutes, a revenue decoupling mechanism.

If the PREC rejects the FRM mechanism, PREPA recommends that a reconciling clause approach be used to decouple revenues from sales. The reconciling clause approach would operate in a manner similar to the FRM if the mechanism is limited to the level of revenues in the test year.

- The level of base rate revenues would be established in a rate request.
- After each year the actual revenues received would be compared to the level of revenues approved in the rate request
- The difference in the actual versus approved revenues would increase / decrease PREPA's base rates for a future time period to be determined.
- PREPA proposes that base rate adjustments occur on a uniform basis for all tariffs in order to minimize complexity

However, this is not PREPA's primary proposal and other specific design details would need to be addressed in this or a subsequent rate design proceeding.

COMMONWEALTH OF PUERTO RICO PUERTO RICO ENERGY COMMISSION

IN RE: THE PUERTO RICO ELECTRIC

NO.: CEPR-AP-2015-0001

POWER AUTHORITY

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INITIAL RATE REVIEW

REGULATION 8720, SECTION 2.14 (A) - SCHEDULE L-1 SUPP

"Schedule L-1 shall present calculations for a proposed fixed charge showing the amount customers shall pay on account of PREPA's obligations to bondholders, which would guarantee the annual payment of PREPA's obligations to bondholders, taking into consideration any reduction in PREPA's debt as a result of the issuance of Restructuring Bonds pursuant to the PREPA Revitalization Act. The prefiled testimony shall explain the derivation of the proposed fixed charge."

The Schedule L-1 stated deficiency is addressed in the attached affidavit of Ralph Zarumba.

Subsidies, CILT and Public Lighting, As Per Schedule E-8/L-2 Ex 4.0 For Costs, Please Refer to the Table in Schedule E-8

Туре	Legal Basis for Subsidy	Purposes and Beneficiaries
Life Preserving Equipment	Act 164 of August 23, 1996 Act 152 of July 19, 1998 Act 79 of July 29, 2007 Act 3 of December 20, 1985 Act 22-2016	A credit equivalent to the cost of the electrical consumption of the health related equipment necessary to preserve life (50% for non-low income customers), is available to qualifying customers. Ordained by Law.
General Agricultural Service	Established in PREPA's current rate structure	General Agricultural Service (GAS) Rate – subsidized rate available to secondary voltage customers for agriculture and livestock operations. It is a discounted GSS rate.
Analog Rate (Churches, Public Well-being)	Act 61 of September 2, 1992 Act 182 of August 17, 2002 Act 22-2016	Qualifying Churches and other public well-being organizations can be charged the residential rate (GRS), instead of the applicable commercial rate. Ordained by Law.
Low Income Customer Subsidy (LICS)	Established in PREPA's current rate structure (Act 83 of May 2, 1941) Act 22-2016	Lifeline Residential Service (LRS) Rate and Residential Service for Public Housing (RH3) Rate. LRS service is directed to recipients of the Food Stamp program. Both rates are discounted charges off the GRS rate.
Hotels	Act 101 of July 9, 1985 Act 266 of November 16, 2002 Act 232 of September 2, 2003 Act 22-2016	Up to an 11% credit of the total monthly energy bill is given to any qualifying hotel, state-owned hotel, or boarding house. Ordained by Law.
Rural Aqueducts	Act 4 of January 8, 2004	The residential rate (GRS), instead of the applicable commercial rate, is available to rural aqueducts that do not belong to Puerto Rico Aqueduct and Sewer Authority (PRASA), which are used to provide potable water to rural communities. Ordained by Law.
Irrigation District	Act 83 of May 2, 1941	Operation and maintenance of PREPA's Irrigation System, canals and related reservoirs. Ordained by Law.
Residential Fuel Subsidy	Act 106 of June 28, 1974 Act 4 of June 8, 1981	Applies to the first \$30 per barrel of the cost of fuel. This subsidy is available to LICS, handicapped, elderly or college students, with a monthly energy consumption of 425 kWh or less. Ordained by Law.

Type	Legal Basis for Subsidy	Purposes and Beneficiaries							
Common Area Condominium Subsidy	Act 199 of August 7, 2008	The residential rate (GRS), instead of the applicable commercial rate, is available to qualifying common areas in condominiums destined to residential purposes. Ordained by Law.							
Direct Debit	Internal Procedure	10% discount on base rates (current rate structure) for customers who pay their electric bills by direct debit.							
Industrial Incentive (Expiring)	Act 111 of July 10, 1986 Current Special Rates were offered as per PREPA's Governing Board Resolution	Special rate as incentive to new industries or industries with expansion areas. Special rates with reduced charges were available to qualifying industries for a term of 3 years (the last qualifying customer discount will expire in August 2016). Ordained by Law.							
Downtown 10% Commerce Subsidy	Act 169 of July 20, 2004	A 10% credit of the total monthly energy bill is given to small commerce in the downtown area, up to a maximum of \$40. Ordained by Law.							
Fixed Public Housing Rate	Act 69-2009 Act 22-2016	The Residential Fixed Rate (RFR) is available to qualifying public housing customers. Rates are based on a fixed charge for all consumption up to a kwh limit, based on number of rooms in the apartment. Ordained by Law.							
PRASA Preferential Rate	Act 50-2013	PREPA shall offer PRASA an "all-in" Preferential Rate of 22¢/kWh to all accounts regardless of voltage level or any existing rate. PREPA suspended this subsidy as of fiscal year 2017, as permitted in Act 50-2013. Ordained by Law.							
Act 73 Income Tax Credit	Act 73-2008 Act 22-2016	Certain industries receive an income tax credit, which may be used to pay electricity consumption. Ordained by Law.							
Contribution In Lieu of Taxes (CILT)	Act 83 of May 2, 1941 Act 57-2014 Act 4-2016	Contribution to cover the cost of municipal electricity use. Act 4-2014 moved municipal public lighting over to a separate subsidy line. Ordained by Law.							
Public Lighting (Municipal)	Act 83 of May 2, 1941 Act 57-2014 Act 4-2016	Contribution to cover the cost of municipal public lighting. Ordained by Law.							
Energy Commission Assessment	Act 57-2014	Yearly Puerto Rico Energy Commission Assessment. Ordained by Law.							

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Description	Total	GRS	RIG	LRS	RFR	GSS	CSP	GST	T0U-P	тои-т	tus	PPMI	SBS	CATV	usst	GAS	LP-13	PLG
Losses from Generation to Transmission	30%																	
Marginal Generation Energy Cost (S/kWh) Bus Bar	5 0.8934																	
Transmission	5 0.07990																	
Primary Secondary	\$ 0.08300																	
Per Southire 54																		
Margital Capacity Cost (SWV-yr)	٦																	
Bus Bar Transmission	5 23.45 5 22.75																	
Primary	5 66.21																	
Secondary	20:00 2																•	
Peyr Catalate P (A)																		
Voltage Level Load Factor	7	Secondary	Secondary	Secondary	Secondary	Secondary	Primary	Transmission	Primary	Transmission	Transmission	Pos Bar	Transmission	Secondary	Secondary	Secondary	Secondary	Secondary
	Per 68-2	0,65	0.73	1169	0.73	0.51	0.69	0.79	0.56 0.07517 \$	0,80	0.54	0.03	0.43	0.91	1.00	8.45	610	0.43
Volumetric Charge	Per 65 7	5 0.17106 \$	0.67912 \$	0.17263 5	0.28627 5	0.19876 3	0.07812 5	0.07121 \$	0.07517 \$	0.06916] 5	0.06916 5	0.06916 \$	0.06916 \$	0.14175	0.10561 5	9.21420 \$	0.36309 5	0.38725
Marginal Generation Energy Cost (\$A:Wh)		S 0.08440 S	0.08440 \$	0.08460 \$	0.08440 S	0.08440 5	0.08300 S	0.07890 S	0.08300 S	0.07890 \$		0.08134 \$	0.07890 S	0.08440	\$ 0.08440 \$ \$ 86.62 \$	0.09440 S 66.62 I S	0.08440 S	0.08440 66.62
Marginal Capacity Cost (SNW-yr)		S 66.62 [S	56.62 \$	66.62 \$	66.62 S		66,21 \$	22.75 S	66.21 S	22.75 \$	22.75 \$	23.45 \$	22.75 \$	66.62	\$ 56.62 5	65,62 S	66.62 5	66.62
Marginal Capacity Cost (\$4V/h) Total Marginel Cost (\$4V/h)	<u> </u>	S 0.00498 S S 0.08938 S	0.00557 5	0.00528 \$	0.00557 \$	0.003a9 \$ 0.08829 \$	0.00518 \$ 0.08818 \$	0.00205 \$ 0.08065 \$	0.00420 S 0.08720 S	0.00208 \$ 0.00098 \$	0.00141 S 0.08031 S	0.00007 \$	0.00113 \$	0.00695	\$ 0.00760 (0.00326
Lious wardwise cost (\$5KWh)	_			0.08988 5							0.08031 [8	0.08142 \$	0.08003 5	0.09135	S 0.09200 (5	0.08780 5	D.08585] \$	0.03766
Portion Placed onto Other Customers		\$ 0.00169 \$	0,58945 \$	0.08295 \$	0.19631 \$	0.11048 \$	(0.00977) \$	(0.00973) \$	(0.01203) \$	(0.01182) \$	(0.01115) \$	(0.01225) \$	(0.01085) 5	0.05040	5 0.04364 5	0.15639 S	0.27725 \$	0.29959

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Losses from Generation to Transmission	3.0	×														UN3	11-10	FIG
Maroinal Generation Energy Cost (SAWIN) Bus Bar Transmission Primary Secondary Per Ishibit 9.04	\$ 0.0813 \$ 0.0739 \$ 0.0830 \$ 0.0844	1																
Maroinal Cacache Cost (SKW-VII) Bus Bar Transmission Primary Secondary For Entitle 9,01	\$ 23.4 \$ 22.7 \$ 662 \$ 665.6	5																
Voltage Level		Secondary	Secondary	Secondary	Secondary	Secondary	Primary	Transpuission	Primary	Transmission	Transmission	Bus Bar	Transmission	Secondary	Secondary	e		
Load Factor	Per M-2	0.45	0,73	0.69	0.73	0.51	0.69	0.79	0.56	0.80	0.54	0.03	0.43	0.91	100	Secondary 0.45	Secondary 0.19	Secondary
Volumetric Charge	Per M-2	S 0.17106	S 0.67942 5	5 0.17263 5	0.23627 \$	0.17876 \$	0.02842 \$	0.07121 \$	0.07517 5	0.06916 S	0.06916 \$	0.06916 S	0.06916 \$	0.14175 S	0.13564 S	9,24420 5	0.36302 5	0.43
Maroinal Generation Energy Cost (SWWh) Maroinal Capacity Cost (SWWw)		\$ 0.08440 \$ 66.62	\$ 0.08440 \$ \$ 68.62 \$	\$ 0,08440 \$ \$ 68,62 \$	0.08440 S 66.62 S	0.08440 S 66.62 S	0.06300 S 66.21 S	0.07890 \$ 22.75 \$	0 08300 5 66,21 5	5 0.07890 S 5 22.75 S	0.07890 S 22.75 S	0.08134 S 23.45 S	0.07890 5 22.75 S	0.08440 \$ 66.62 \$	0.08440 S 66.62 S	0.08440 S 66,62 S	0.08440 S 68.62 S	0,38725 0 08440 88 62
Marginal Capacity Cost (SAWh)		s 0.00498			0.00557 S	0.00389 \$	0.00518 \$	0,00205 \$	0.00420		0,00141 5		0.00113 S	0 00695 s	0.00760 S	0.00340 S	0.00146	0.00326
Total Marginal Cost (\$/kWh)		\$ 0,08938	\$ 0.08997	\$ 0.08968	D.08997 S	0.08829 S	0.08818 S	0.08095 \$	0.08720 1	s 0.08006 s	0.08031 \$	0.08142 \$	0.08003 S	0.09135 \$	0.09200 S	0.08780 5	0.00145 5	0.08766
Portion Placed onto Other Customers		\$ 0.08169	S 0 58945 S	\$ 0.08295 5	0,19831 \$	0.11048 S	(0.00977) S	(0.00973) 5	(0.01203)	(0.01182) 5	(0.01115) S	(0.01225) \$	a) manan I s	0.05040 5	0.04304 e	0.15000 5		

Puerto Rico Electric Power Authority Request re Schedule N-1 Advantages and Disadvantages to a Formula Ratemaking Mechanism

Request

If PREPA proposes a formula rate structure, it shall be presented on Schedule N-1. However, the formal application shall also include an alternative rate structure that is more typical of utility rate filings; specifically, one that does not envision either annual rate increases occurring outside of a base rate case, or "true-ups" for cost elements other than fuel and purchased power.

Schedule N-1: PREPA's testimony did not describe the advantages and disadvantages of both approaches.

Response

Underlying PREPA's request for a Formula Ratemaking Mechanism (FRM) are the following assumptions:

- (1) PREPA currently has no or limited access to capital markets. PREPA cannot solve liquidity problems with short-term borrowing, nor can it finance capital investments using traditional borrowing.
- (2) PREPA currently has a very low level of cash reserves. PREPA's level of effectively available cash has been further reduced by the restriction of its holdings at the GDB.
- (3) Execution of PREPA's business plan is significantly decreasing the level of O&M Expenses PREPA incurs and should continue to improve its operational efficiency going forward.
- (4) Significant capital expenditures are planned over the next several years. The specific timing of those expenditures is difficult to determine.

Advantages and Disadvantages of Formula Ratemaking

Advantages

Compliance with the RSA: The Restructuring Support Agreement ("RSA") identified as the "Agreement with Creditors" in the Revitalization Act requires that a FRM mechanism be implemented. If the PREC does not permit PREPA to implement a FRM, PREPA cannot comply with this requirement.

Avoid Regulatory Lag: Currently the PREC requires approximately 6 months to decide upon a rate request after the case is filed. The preparation time for a rate case is estimated at 3-6 months. As a result, a FRM mechanism will avoid regulatory lag of up to 9 to 12 months before tariffs are adjusted. As a result, the FRM will better match rates and costs, regardless of the direction of change.

Address Liquidity Problems: Implementation of a FRM mechanism would aid in addressing PREPA's liquidity problems. By reducing the time it takes rates to respond to investments, changes in costs, or changes in billing determinants, an FRM reduces the need to maintain cash in the interim.

Reduction in Rate Case Expenses: A FRM will significantly reduce the expenditures required for rate adjustments.

CAPEX Scheduling: PREPA is planning significant capital expenditures. While major investments will be reviewed by PREC in the IRP process and/or the rate request process, the specific timing of these projects may vary based upon a number of factors outside of PREPA's control such as permitting, availability of materials and skilled labor and other related factors. The FRM mechanism allows the PREPA and the PREC to better match timing of the investments with the rates required to support them.

Disadvantages

Perception of Change in PREC Oversight: Because a baseline case will occur only every three years, the perception could be created that oversight by the PREC will be reduced. However, PREC continues to have the same substantive powers of review as in the alternative (annual standard cases). Also, as is stated above, most significant capital expenditures will need to be reviewed by PREC in advance. Further, PREPA is not seeking automatic increases. PREPA is committed to seeking to continue to improve its efficiency and reduce costs while meeting its service obligations and improvement objectives.