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SOAH DOCKET NO. 473-19-5243
PUC DOCKET NO. 49583

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PUBLIC UTILITY COMMISSION
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APPLICATION OF CENTERPOINT	§	
ENERGY HOUSTON ELECTRIC, LLC	§	
FOR APPROVAL TO AN ADJUSTMENT	§	BEFORE THE
TO ITS ENERGY EFFICIENCY COST	§	STATE OFFICE OF
RECOVERY FACTOR	§	ADMINISTRATIVE HEARINGS

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July 11, 2019

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**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 49583
SOAH DOCKET NO. 473-19-5243**

**GULF COAST COALITION OF CITIES
REQUEST NO.: GCCC01-01**

QUESTION:

Refer to the Errata of CEHE witness Shea Richardson. Please explain the basis for the errata and why his original testimony did not correctly represent the results of CEHE's energy efficiency programs.

ANSWER:

The errata was filed to correct Table 11 of Exhibit SAR-1. In the original version of Exhibit SAR-1, CEHE's overall 2018 portfolio expenditure total was correctly represented, but program-specific expenditure values were transposed for several programs. The updated Table 11 filed in the errata corrected this issue to display the 2018 expenditures on the correct line associated with each program.

SPONSOR (PREPARER):
Shea Richardson

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 49583
SOAH DOCKET NO. 473-19-5243**

**GULF COAST COALITION OF CITIES
REQUEST NO.: GCCC01-02**

QUESTION:

Refer to the Errata of CEHE witness Shea Richardson. Please explain if the changes to Mr. Richardson's testimony had any impact on CEHE's proposed energy efficiency rates or requested bonus. If so, provide the revised rates and bonus, and all supporting workpapers.

ANSWER:

No, the errata did not impact CEHE's requested bonus or proposed adjustments to the Energy Efficiency Cost Recovery Factor.

SPONSOR (PREPARER):
Shea Richardson

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 49583
SOAH DOCKET NO. 473-19-5243**

**GULF COAST COALITION OF CITIES
REQUEST NO.: GCCC01-03**

QUESTION:

Refer to the Direct Testimony of Shea Richardson, page 13. Please explain the measures that CEHE is taking to improve the Commercial REP program to meet the cost effectiveness standard in 2019. If no reform measures are being implemented, why does the Company continue the program in 2019 and 2020?

ANSWER:

In 2019, a variable incentive rate has been introduced to improve the cost effectiveness of the program and a pay for performance implementer contract was executed. In addition, internal marketing efforts through the Company's C&I Customer Relationship Management Team have been leveraged to attract additional commercial customer participation.

SPONSOR (PREPARER):
Shea Richardson

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 49583
SOAH DOCKET NO. 473-19-5243**

**GULF COAST COALITION OF CITIES
REQUEST NO.: GCCC01-04**

QUESTION:

Refer to the Direct Testimony of Shea Richardson, page 13. Please explain the measures that CEHE is taking to improve the Residential REP program to meet the cost effectiveness standard in 2019. If no reform measures are being implemented, why does the Company continue the program in 2019 and 2020?

ANSWER:

A variable incentive rate has been introduced in 2019 to improve the cost effectiveness of the program and a pay for performance implementer contract was initiated. In addition to the demand and energy reduction provided through the Residential REP program, the program also supports the directive in Texas Administrative Code ("TAC") § 25.181(r) that utilities "encourage and facilitate the involvement of retail electric providers as energy efficiency service companies in the delivery of efficiency and demand response programs."

SPONSOR (PREPARER):

Shea Richardson

RESPONSIVE DOCUMENTS:

None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 49583
SOAH DOCKET NO. 473-19-5243**

**GULF COAST COALITION OF CITIES
REQUEST NO.: GCCC01-05**

QUESTION:

Refer to the Direct Testimony of Shea Richardson, page 13. Please explain the basis for Mr. Richardson's expectation that the Retro-Commissioning Program, which did not meet the cost effectiveness standard in 2018, will reach that standard in 2019.

ANSWER:

Adjustments to energy and demand savings made through the Evaluation, Measurement and Verification (EM&V) process had a significant impact on the cost effectiveness of the 2018 Retro-Commissioning program. The EM&V Team determined that additional measurement and verification data was needed to substantiate the savings calculated on four projects performed at a large technology campus. As a result, only 40% of the original savings for those four projects were claimed in 2018 which reduced program cost effectiveness. The remaining 60% of the original savings will be claimed in 2019 based on analysis of the additional M&V data collected. In addition, the program was modified for 2019 to streamline the participation process, and a customer incentive component was added. Due to these program modifications and the marketing efforts of the program implementer, increases in program participation, savings, and cost effectiveness are expected.

SPONSOR (PREPARER):

Shea Richardson

RESPONSIVE DOCUMENTS:

None

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 49583
SOAH DOCKET NO. 473-19-5243
GULF COAST COALITION OF CITIES
REQUEST NO.: GCCC01-06

QUESTION:

Refer to Exhibit SAR-1, Table 5:

- a. Please explain the basis for CEHE' s expectation of Commercial Standard Offer Program (SOP) demand and energy savings in 2019 and 2020, given that actual savings were less than half the projected savings in 2017 and 2018.
- b. Please explain why the Smart Thermostat Program (Pilot) shows both demand and energy savings in 2019 but only energy savings in 2020.
- c. Please explain why the Smart Home Energy Management System (Pilot) shows only energy savings in 2020.

ANSWER:

- a. CEHE plans to implement new strategies to streamline the program participation process, including, but not limited to:
 - The elimination of a required 5% deposit on retrofit incentive reservations;
 - Encouraging the inclusion of all qualified commercial projects, both small and large; and
 - Greater networking and presence to commercial groups and national and local businesses, particularly customers in the early stages of new construction projects.
- b. The Smart Thermostat Program (Pilot) savings projections for Program Years 2018 and 2019 were based on estimates developed prior to the inclusion of Smart Thermostats as a measure in the Technical Reference Manual. Version 6.0 of the Technical Reference Manual includes deemed energy savings estimates for smart thermostats, but it does not provide demand savings for this measure. Consequently, projections for demand reduction were not included in the 2020 plan for the program.
- c. The Smart Home Energy Management System Pilot will be evaluating the potential of energy savings using occupancy-based controllers of electrical systems such as HVAC, water heating, and lighting in newly constructed homes. Since the potential energy savings will be evaluated from reducing the operating hours of electrical systems when homes are unoccupied instead of reducing the load capacity of the electrical system, it is not expected to see a significant reduction in peak demand. Any realized peak demand savings will be evaluated and reported as the pilot matures.

SPONSOR (PREPARER):
Shea Richardson

RESPONSIVE DOCUMENTS:
None

**CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 49583
SOAH DOCKET NO. 473-19-5243**

**GULF COAST COALITION OF CITIES
REQUEST NO.: GCCC01-07**

QUESTION:

Refer to Exhibit SAR-1, Table 8:

- a. Please explain why the verified demand and energy savings for the Commercial Standard Offer Program (SOP) in 2018 were less than half of the projected savings.
- b. Please explain why the verified demand and energy savings for the Residential REP Program in 2018 were less than half of the projected savings.

ANSWER:

- a. An overall participation trend for the Commercial Standard Offer Program has been a shift from large projects to smaller projects. These small projects yield lower savings impacts requiring a higher number of completed projects to meet program targets. Also, for 2018 the SOP program participation declined in the last quarter due to large retrofit projects being reduced or complete cancellation. In addition, more than \$1M of reserved funds were not claimed due to delayed construction. Most of those projects are scheduled to complete in 2019
- b. The pay for performance implementer contract executed for this program took additional time for legal review. As a result, the REP program got off to a late start because of contract negotiations and legal review by the program implementer. CEHE expects that measures taken to improve performance, including the pay for performance contract and a variable incentive rate, will enable the program to cost-effectively reach 2019 projections for demand and energy savings.

SPONSOR (PREPARER):
Shea Richardson

RESPONSIVE DOCUMENTS:
None

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC
PUC DOCKET NO. 49583
SOAH DOCKET NO. 473-19-5243
GULF COAST COALITION OF CITIES
REQUEST NO.: GCCC01-08

QUESTION:

Refer to Exhibit JRD-2, Schedule G:

- a. Please explain if the monthly kWhs are weather normalized. If so, provide workpapers supporting the adjustments. If not, explain why not.
- b. Please explain how CEHE forecast reductions due to program opt outs of commercial customers, and provide the forecast.

ANSWER:

The information presented in Exhibit JRD-2, Schedule G was provided from the Summary for Rates tab in the attached workpaper, GCCC01-08 EECRF Billing Determinants 2019 (2020-23).xlsx.

- a. As shown in the Summary for Rates tab, the Company used actual weather for the months of January 2018 through February 2019 and a forecast based on 10-year normal weather for the remainder of 2019 through 2021. The forecast is shown in the Source Forecast tab within the attached workpaper.
- b. As shown in the Summary for Rates tab (Rows 52 through 105), the Company subtracted the EECRF Opt-outs kWhs from the actual and forecasted kWhs for the different commercial customer rate classes and presented the difference in Rows 11 through 49. The forecasted information is provided in the Source Forecast tab and the EECRF Opt-out information is provided in the EECRF_OPT_OUT_KWH tab.

SPONSOR (PREPARER):
John Durland/Shea Richardson

RESPONSIVE DOCUMENTS:
GCCC01-08 EECRF Billing Determinants 2019 (2020-23).xlsx

BILLING DETERMINANTS FOR EECRF UPDATE - 2019

Actuals through Feb 2019 Forecast for remainder of 2019 and 2020-2021 from the 2019-23 Business Plan

Index	Rate Class	Year	KWH												Annual	
			1	2	3	4	5	6	7	8	9	10	11	12		
			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec		
RES_KWH_2018	RES	2018	2,546,294,391	1,777,489,480	1,606,827,338	1,756,933,674	2,217,602,372	3,391,045,571	3,661,961,947	3,990,061,487	3,180,094,379	2,881,426,306	1,781,237,829	1,777,359,324	30,568,694,098	30,568,694,098
RES_KWH_2019	RES	2019	2,096,286,940	1,668,087,200	1,679,355,571	1,797,178,096	2,319,193,069	3,101,757,358	3,662,429,766	3,856,741,108	3,468,072,117	2,587,417,426	1,979,271,364	1,894,112,548	30,109,902,564	30,109,902,564
RES_KWH_2020	RES	2020	2,118,776,605	1,892,334,137	1,706,478,110	1,826,290,010	2,356,870,112	3,152,292,146	3,722,269,701	3,919,937,424	3,525,066,600	2,630,067,726	2,011,999,603	1,925,535,629	30,787,917,803	30,787,917,803
RES_KWH_2021	RES	2021	2,156,173,448	1,923,952,226	1,735,102,281	1,857,051,734	2,396,746,116	3,205,881,113	3,785,871,570	3,987,275,543	3,585,954,909	2,675,749,427	2,047,139,135	1,959,346,567	31,316,244,070	31,316,244,070
SVS_KWH_2018	SVS	2018	87,138,646	68,555,640	69,017,028	71,199,676	73,950,711	80,592,770	82,678,239	88,730,492	77,078,085	84,817,624	70,711,246	71,141,392	925,611,547	1,006,913,343
SVS_KWH_2019	SVS	2019	84,686,958	69,211,271	75,000,778	76,871,765	79,608,157	84,322,013	88,637,874	91,955,701	89,393,559	84,993,262	81,387,950	80,458,639	986,527,929	986,527,929
SVS_KWH_2020	SVS	2020	83,835,226	76,842,740	75,566,193	77,531,356	80,375,565	85,225,033	89,681,887	93,136,368	90,634,682	86,259,833	82,680,814	81,812,386	1,003,582,083	1,003,582,083
SVS_KWH_2021	SVS	2021	85,715,876	78,293,350	77,046,579	79,104,394	82,053,191	87,050,906	91,637,094	95,193,946	92,656,563	88,194,253	84,536,786	83,648,309	1,025,131,246	1,025,131,246
SVL_AMS_KWH_2018	SVL_AMS	2018	1,555,400,905	1,241,677,894	1,266,583,116	1,326,996,635	1,462,020,712	1,729,673,955	1,781,290,960	1,942,783,003	1,625,092,272	1,700,880,699	1,275,146,230	1,233,420,024	18,140,966,405	15,231,214,834
SVL_AMS_KWH_2019	SVL_AMS	2019	1,418,562,246	1,203,927,618	1,332,111,037	1,402,227,722	1,539,354,104	1,711,094,442	1,844,932,280	1,908,993,671	1,799,250,502	1,611,019,589	1,446,721,868	1,370,669,735	18,588,864,816	18,588,864,816
SVL_AMS_KWH_2020	SVL_AMS	2020	1,144,655,877	1,041,182,712	1,059,308,343	1,141,259,826	1,179,265,329	1,295,762,247	1,344,359,358	1,360,011,375	1,347,064,526	1,314,237,566	1,157,642,536	1,111,052,960	14,495,802,655	14,495,802,655
SVL_AMS_KWH_2021	SVL_AMS	2021	1,504,575,629	1,416,675,138	1,404,197,007	1,477,847,234	1,622,020,066	1,802,627,129	1,943,328,740	2,010,369,206	1,894,459,071	1,696,046,056	1,522,805,731	1,442,663,464	19,737,614,470	19,737,614,470
SVL_IDR_KWH_2018	SVL_IDR	2018	1,216,436,041	943,552,592	1,046,497,707	1,129,845,072	1,195,834,128	1,296,253,535	1,332,334,951	1,463,403,575	1,180,243,680	1,388,481,099	1,069,337,923	997,705,117	14,259,925,419	18,557,214,225
SVL_IDR_KWH_2019	SVL_IDR	2019	1,140,848,392	1,012,652,676	1,052,125,332	1,133,719,738	1,171,507,353	1,288,257,113	1,337,785,435	1,353,304,826	1,341,188,440	1,308,190,938	1,152,863,908	1,106,639,391	14,399,083,543	14,399,083,543
SVL_IDR_KWH_2020	SVL_IDR	2020	1,464,662,835	1,377,823,053	1,366,513,827	1,437,728,748	1,578,128,154	1,754,582,052	1,892,249,069	1,957,406,976	1,844,551,456	1,650,949,118	1,482,155,664	1,404,149,903	19,210,900,855	19,210,900,855
SVL_IDR_KWH_2021	SVL_IDR	2021	1,146,418,333	1,042,380,925	1,060,310,420	1,141,979,070	1,179,863,220	1,296,267,902	1,344,949,585	1,360,586,645	1,347,576,237	1,315,079,911	1,158,354,400	1,112,137,272	14,505,903,920	14,505,903,920
PVS_AMS_KWH_2018	PVS_AMS	2018	23,954,671	20,402,075	19,266,426	20,589,672	21,922,050	27,528,493	28,343,823	32,365,369	26,804,590	28,007,130	22,736,011	20,625,239	292,545,551	356,981,885
PVS_AMS_KWH_2019	PVS_AMS	2019	23,678,155	22,310,417	23,250,350	24,449,112	26,930,715	29,854,589	31,974,733	33,077,536	31,332,070	28,230,675	25,279,452	24,034,678	324,402,481	324,402,481
PVS_AMS_KWH_2020	PVS_AMS	2020	26,730,849	26,996,397	26,384,915	27,489,938	29,987,150	32,918,584	34,909,603	35,754,473	33,544,575	29,937,548	26,564,760	25,035,044	356,253,836	356,253,836
PVS_AMS_KWH_2021	PVS_AMS	2021	26,750,404	27,704,891	26,894,001	27,944,361	30,302,480	33,132,896	34,998,851	35,764,831	33,525,390	29,901,688	26,540,467	25,016,534	358,476,795	358,476,795
PVS_IDR_KWH_2018	PVS_IDR	2018	329,767,186	255,784,058	303,470,838	321,622,711	341,611,648	356,695,200	366,617,465	372,118,632	315,458,385	355,942,038	283,149,008	268,781,754	3,871,018,923	3,561,433,560
PVS_IDR_KWH_2019	PVS_IDR	2019	304,747,493	276,090,759	284,218,493	301,216,438	304,768,646	335,598,593	336,940,926	334,495,549	348,000,661	311,300,949	305,269,530	280,424,169	3,723,072,208	3,723,072,208
PVS_IDR_KWH_2020	PVS_IDR	2020	276,181,538	262,302,974	267,471,501	284,851,857	289,494,222	320,398,554	323,125,858	322,464,464	337,332,810	302,879,328	298,716,355	275,502,470	3,560,721,930	3,560,721,930
PVS_IDR_KWH_2021	PVS_IDR	2021	278,428,902	260,767,239	266,771,867	284,470,086	289,814,413	321,718,060	324,877,663	324,720,831	339,625,577	305,273,697	301,133,335	277,973,555	3,575,575,225	3,575,575,225
TVS_IDR_KWH_2018	TVS_IDR	2018	2,412,574,374	1,355,960,811	1,395,343,811	1,875,736,382	1,910,551,110	1,459,712,416	1,782,343,881	1,862,900,283	1,516,556,580	1,743,606,166	1,735,598,418	1,746,001,143	20,796,885,375	20,772,844,345
TVS_IDR_KWH_2019	TVS_IDR	2019	1,609,734,187	1,626,483,378	1,516,339,004	1,752,580,787	1,706,497,020	1,805,810,648	1,746,845,076	1,726,741,250	1,776,933,522	1,702,103,148	1,741,674,902	1,755,010,857	20,466,753,781	20,466,753,781
TVS_IDR_KWH_2020	TVS_IDR	2020	1,629,730,702	1,614,932,205	1,522,956,581	1,759,663,959	1,713,044,017	1,817,976,719	1,759,251,395	1,739,366,473	1,789,509,628	1,714,680,724	1,754,063,256	1,767,795,363	20,582,971,021	20,582,971,021
TVS_IDR_KWH_2021	TVS_IDR	2021	1,738,766,484	1,695,769,747	1,610,936,781	1,861,645,652	1,838,494,532	1,905,518,048	1,837,814,644	1,865,270,817	1,890,913,235	1,810,120,412	1,850,083,382	1,868,157,271	21,773,491,005	21,773,491,005
MLS_KWH_2018	MLS	2018	4,428,406	3,969,946	4,178,052	4,159,269	4,384,868	4,178,650	4,166,733	4,542,372	3,773,877	4,519,046	3,989,205	3,699,927	49,990,351	48,023,155
MLS_KWH_2019	MLS	2019	4,339,169	3,891,090	4,149,679	4,143,859	4,137,401	4,131,993	4,126,894	4,127,539	4,118,688	4,115,132	4,112,225	4,109,563	49,498,322	49,498,322
MLS_KWH_2020	MLS	2020	4,042,755	3,983,829	3,982,985	3,997,796	3,992,149	3,997,578	4,003,281	4,009,586	4,016,174	4,022,571	4,036,152	4,036,152	48,040,607	48,040,607
MLS_KWH_2021	MLS	2021	4,016,371	3,928,762	3,934,935	3,945,886	3,955,492	3,965,178	3,974,089	3,982,631	3,990,598	3,997,808	4,004,628	4,010,692	47,707,069	47,707,069
SLS_KWH_2018	SLS	2018	16,900,689	16,682,528	16,657,712	16,589,336	16,539,373	16,549,273	14,169,151	19,861,432	15,086,607	17,526,893	14,969,215	15,092,308	197,624,517	178,530,282
SLS_KWH_2019	SLS	2019	15,897,953	16,117,897	16,150,102	16,064,173	15,931,985	15,879,460	15,907,445	15,726,384	15,628,284	15,576,119	15,467,505	15,355,879	189,703,184	189,703,184
SLS_KWH_2020	SLS	2020	14,680,881	15,426,800	15,325,235	15,250,408	15,129,000	15,089,894	15,133,767	14,962,830	14,876,724	14,837,180	14,738,609	14,635,673	180,087,001	180,087,001
SLS_KWH_2021	SLS	2021	13,873,666	14,677,297	14,577,798	14,503,320	14,378,234	14,334,760	14,373,364	14,189,775	14,092,646	14,043,759	13,936,447	13,827,765	170,808,830	170,808,830
SVS_KWH_2018	SVS	2018	87,138,646	68,555,640	69,017,028	71,199,676	73,950,711	80,592,770	82,678,239	88,730,492	77,078,085	84,817,624	70,711,246	71,141,392	925,611,547	1,006,913,343
SVS_KWH_2019	SVS	2019	84,686,958	69,211,271	75,000,778	76,871,765	79,608,157	84,322,013	88,637,874	91,955,701	89,393,559	84,993,262	81,387,950	80,458,639	986,527,929	986,527,929
SVS_KWH_2020	SVS	2020	83,835,226	76,842,740	75,566,193	77,531,356	80,375,565	85,225,033	89,681,887	93,136,368	90,634,682	86,259,833	82,680,814	81,812,386	1,003,582,083	1,003,582,083
SVS_KWH_2021	SVS	2021	85,715,876	78,293,350	77,046,579	79,104,394	82,053,191	87,050,906	91,637,094	95,193,946	92,656,563	88,194,253	84,536,786	83,648,309	1,025,131,246	1,025,131,246
SVS EECRF Opt-outs	SVS	2018-2020	25,410	25,410	25,410	25,410	25,410	25,410	25,410	25,410	25,410	25,410	25,410	25,410	25,410	322,317
SVS EECRF Opt-outs	SVS	2020-2021	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SVS EECRF Opt-outs	SVS	2020-2022	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SVL_AMS_KWH_2018	SVL_AMS	2018	1,555,400,905	1,241,677,894	1,266,583,116	1,326,996,635	1,462,020,712	1,729,673,955	1,781,290,960	1,942,783,003	1,625,092,272	1,700,880,699	1,275,146,230	1,233,420,024	18,140,966,405	15,231,214,834
SVL_AMS_KWH_2019	SVL_AMS	2019	1,418,562,246	1,203,927,618	1,332,111,037	1,402,227,722	1,539,354,104	1,711,094,442	1,844,932,280	1,908,993,671	1,799,250,502	1,611,019,589	1,446,721,868	1,370,669,735	18,588,864,816	18,588,864,816

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2019-2021 Forecast

H:\PLANREV\TDO\5-year Business Plan\BPS 2019-23\BPS 2019-23 vFinal (Nov-18) xlsx

	1	2	3	4	5	6	7	8	9	10	11	12	Annual
RES_KWH_2019	2,084,082,124	1,862,348,678	1,679,355,571	1,797,178,096	2,319,193,069	3,101,757,358	3,662,429,766	3,856,741,108	3,468,072,117	2,587,417,426	1,979,271,364	1,894,112,548	
SVS_KWH_2019	82,401,624	76,370,450	75,022,873	76,895,957	79,632,645	84,352,778	88,668,971	91,987,486	89,425,033	85,021,903	81,411,852	80,481,089	
SVL_AMS_KWH_2019	1,430,390,617	1,344,424,803	1,332,798,553	1,402,938,995	1,540,057,716	1,711,818,983	1,845,728,088	1,909,701,612	1,799,888,882	1,611,643,208	1,447,264,533	1,371,314,310	
SVL_IDR_KWH_2019	1,143,855,304	1,036,129,104	1,054,334,439	1,136,624,698	1,174,683,537	1,291,193,722	1,340,380,390	1,356,253,779	1,344,113,168	1,311,357,575	1,155,990,168	1,109,709,941	
PVS_AMS_KWH_2019	26,229,514	23,821,006	23,451,650	24,707,112	27,205,695	30,166,589	32,307,673	33,355,276	31,651,090	28,507,515	25,573,932	24,314,758	
PVS_IDR_KWH_2019	282,064,077	281,148,146	285,383,585	302,052,238	305,639,205	337,123,388	338,474,495	336,034,606	349,345,087	312,873,670	306,859,049	282,299,518	
TVS_IDR_KWH_2019	1,780,317,838	1,746,833,592	1,660,283,450	1,918,482,979	1,894,712,036	1,963,052,202	1,892,300,278	1,915,139,419	1,940,203,918	1,857,048,546	1,898,795,907	1,910,093,952	
MLS_KWH_2019	4,107,503	4,161,139	4,149,679	4,143,859	4,137,401	4,131,993	4,126,894	4,122,539	4,118,688	4,115,132	4,112,225	4,109,563	
SLS_KWH_2019	15,389,681	16,260,922	16,150,102	16,064,173	15,931,985	15,879,460	15,907,445	15,726,384	15,628,284	15,576,119	15,467,505	15,355,879	
RES_KWH_2020	2,118,776,605	1,892,334,137	1,706,478,110	1,826,290,010	2,356,870,112	3,152,292,146	3,722,269,701	3,919,937,424	3,525,066,600	2,630,067,726	2,011,999,603	1,925,535,629	
SVS_KWH_2020	83,860,845	76,868,549	75,588,288	77,555,548	80,400,053	85,255,798	89,712,984	93,168,153	90,666,156	86,288,474	82,704,716	81,834,836	
SVL_IDR_KWH_2020	1,467,723,160	1,380,777,448	1,368,722,934	1,440,633,708	1,581,304,338	1,757,518,661	1,894,844,024	1,960,355,929	1,847,476,184	1,654,115,755	1,485,281,924	1,407,220,453	
SVL_AMS_KWH_2020	1,145,597,729	1,041,898,705	1,060,015,059	1,141,996,699	1,180,000,141	1,296,524,228	1,345,191,646	1,360,750,836	1,347,736,826	1,314,896,225	1,158,225,201	1,111,731,455	
PVS_AMS_KWH_2020	27,084,909	27,251,337	26,586,215	27,747,938	30,262,130	33,230,584	35,242,543	36,032,213	33,863,595	30,214,388	26,859,240	25,315,124	
PVS_IDR_KWH_2020	278,248,772	263,516,427	268,636,593	285,687,657	290,364,781	321,923,349	324,659,427	324,003,521	338,677,236	304,452,049	300,305,874	277,377,819	
TVS_IDR_KWH_2020	1,788,755,259	1,753,845,337	1,666,901,027	1,925,566,151	1,901,259,033	1,975,218,272	1,904,706,596	1,927,764,642	1,952,780,025	1,869,626,122	1,911,184,260	1,922,878,459	
MLS_KWH_2020	4,042,755	3,983,829	3,982,985	3,987,796	3,992,149	3,997,578	4,003,281	4,009,586	4,016,174	4,022,751	4,029,571	4,036,152	
SLS_KWH_2020	14,680,881	15,426,800	15,325,235	15,250,408	15,129,000	15,089,894	15,133,767	14,962,830	14,876,724	14,837,180	14,738,609	14,635,673	
RES_KWH_2021	2,156,173,448	1,923,952,226	1,735,102,281	1,857,051,734	2,396,746,116	3,205,881,113	3,785,871,570	3,987,275,543	3,585,954,909	2,675,749,427	2,047,139,135	1,959,346,567	
SVS_KWH_2021	85,715,876	78,293,350	77,046,579	79,104,394	82,053,191	87,050,906	91,637,094	95,193,946	92,656,563	88,194,253	84,536,786	83,648,309	
SVL_AMS_KWH_2021	1,504,607,149	1,416,699,658	1,404,218,007	1,477,875,234	1,622,053,666	1,802,667,569	1,943,370,020	2,010,404,926	1,894,497,791	1,696,085,296	1,522,849,331	1,442,699,784	
SVL_IDR_KWH_2021	1,147,116,830	1,043,100,914	1,061,033,039	1,142,722,561	1,180,653,590	1,297,127,528	1,345,730,120	1,361,412,656	1,348,427,826	1,315,914,869	1,159,184,636	1,112,956,560	
PVS_AMS_KWH_2021	26,952,004	27,925,871	27,055,401	28,063,761	30,444,860	33,287,096	35,186,831	35,892,031	33,682,590	30,031,288	26,694,067	25,170,134	
PVS_IDR_KWH_2021	279,215,035	260,982,844	266,878,425	284,613,637	289,958,120	322,109,066	325,328,148	325,014,017	339,951,017	305,704,203	301,529,519	278,451,833	
TVS_IDR_KWH_2021	1,804,575,425	1,761,636,164	1,674,253,890	1,933,436,342	1,910,958,287	1,980,395,323	1,909,985,881	1,938,509,512	1,963,483,094	1,880,330,442	1,921,727,540	1,939,199,105	
MLS_KWH_2021	4,016,371	3,928,762	3,934,935	3,945,886	3,955,492	3,965,178	3,974,089	3,982,631	3,990,598	3,997,808	4,004,628	4,010,692	
SLS_KWH_2021	13,873,666	14,677,297	14,577,798	14,503,320	14,378,234	14,334,760	14,373,364	14,189,775	14,092,646	14,043,759	13,936,447	13,827,765	

Index	Meter	LEGACY_SYSTEM_CD	RATE_CLASS_CD	Opt-out Term	ESI_ID	ACCT_NO	Billing Account Name	Site Name	Address
MLS_AMS_-	AMS	CIS	MLS	-					
MLS_AMS_-	AMS	CIS	MLS	-					
MLS_AMS_-	AMS	CIS	MLS	-					
MLS Total_AMS_-	AMS	CIS	MLS Total	-					
PVS_AMS_-	AMS	CIS	PVS	-					
PVS Total_AMS_-	AMS	CIS	PVS Total	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL_AMS_-	AMS	CIS	SVL	-					
SVL Total_AMS_-	AMS	CIS	SVL Total	-					
SVS_AMS_-	AMS	CIS	SVS	-					
SVS_AMS_-	AMS	CIS	SVS	-					
SVS_AMS_-	AMS	CIS	SVS	-					
SVS_AMS_-	AMS	CIS	SVS	-					
SVS_AMS_-	AMS	CIS	SVS	-					
SVS_AMS_-	AMS	CIS	SVS	-					
SVS_AMS_-	AMS	CIS	SVS	-					
SVS_AMS_-	AMS	CIS	SVS	-					
SVS_AMS_-	AMS	CIS	SVS	-					
SVS Total_AMS_-	AMS	CIS	SVS Total	-					
PVS_IDR_-	IDR	SAP	PVS	-					
PVS_IDR_-	IDR	SAP	PVS	-					
PVS_IDR_-	IDR	SAP	PVS	-					
PVS_IDR_-	IDR	SAP	PVS	-					
PVS_IDR_-	IDR	SAP	PVS	-					
PVS_IDR_-	IDR	SAP	PVS	-					
PVS_IDR_-	IDR	SAP	PVS	-					
PVS_IDR_-	IDR	SAP	PVS	-					
PVS_IDR_-	IDR	SAP	PVS	-					
PVS Total_IDR_-	IDR	SAP	PVS Total	-					
SVL_IDR_-	IDR	SAP	SVL	-					
SVL_IDR_-	IDR	SAP	SVL	-					
SVL_IDR_-	IDR	SAP	SVL	-					
SVL_IDR_-	IDR	SAP	SVL	-					
SVL_IDR_-	IDR	SAP	SVL	-					
SVL_IDR_-	IDR	SAP	SVL	-					
SVL_IDR_-	IDR	SAP	SVL	-					
SVL_IDR_-	IDR	SAP	SVL	-					
SVL_IDR_-	IDR	SAP	SVL	-					
SVL_IDR_-	IDR	SAP	SVL	-					
SVL Total_IDR_-	IDR	SAP	SVL Total	-					
TVS_IDR_-	IDR	SAP	TVS	-					
TVS Total_IDR_-	IDR	SAP	TVS Total	-					
PVS_AMS_2018-2020	AMS	CIS	PVS	2018-2020					
PVS_AMS_2018-2020	AMS	CIS	PVS	2018-2020					
PVS_AMS_2018-2020	AMS	CIS	PVS	2018-2020					
PVS_AMS_2018-2020	AMS	CIS	PVS	2018-2020					

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Index	Meter	LEGACY_SYSTEM_CD	RATE_CLASS_CD	Opt-out Term	EN_ID	ACCT_NO	Billing Account Name	Site Name	Address
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS_IDR_2018-2020	IDR	SAP	TVS	2018-2020					
TVS Total_IDR_2018-2020	IDR	SAP	TVS Total	2018-2020					
PVS_AMS_2019-2021	AMS	CIS	PVS	2019-2021					
PVS_AMS_2019-2021	AMS	CIS	PVS	2019-2021					
PVS_AMS_2019-2021	AMS	CIS	PVS	2019-2021					
PVS_AMS_2019-2021	AMS	CIS	PVS	2019-2021					
PVS Total_AMS_2019-2021	AMS	CIS	PVS Total	2019-2021					
SVL_AMS_2019-2021	AMS	CIS	SVL	2019-2021					
SVL Total_AMS_2019-2021	AMS	CIS	SVL Total	2019-2021					
PVS_IDR_2019-2021	IDR	SAP	PVS	2019-2021					
PVS_IDR_2019-2021	IDR	SAP	PVS	2019-2021					
PVS Total_IDR_2019-2021	IDR	SAP	PVS Total	2019-2021					
SVL_IDR_2019-2021	IDR	SAP	SVL	2019-2021					
SVL_IDR_2019-2021	IDR	SAP	SVL	2019-2021					
SVL_IDR_2019-2021	IDR	SAP	SVL	2019-2021					
SVL Total_IDR_2019-2021	IDR	SAP	SVL Total	2019-2021					
SVL_AMS_2020-2022	AMS	CIS	SVL	2020-2022					
SVL Total_AMS_2020-2022	AMS	CIS	SVL Total	2020-2022					
Grand Total									

[illegible]

Service Address	Starting Year	Second Year	Final Year	kwh_201801	kwh_201802	kwh_201803	kwh_201804	kwh_201805	kwh_201806	kwh_201807	kwh_201808	kwh_201809	kwh_201810	kwh_201811	kwh_201812
	2018	2019	2020	152460	33960	39900	138600	132600	157800	144960	150540	161820	147240	140880	126480
	2018	2019	2020	174880	173760	150720	171520	176000	156000	200320	185760	176800	161600	150240	161120
	2018	2019	2020	2354	3084	1970	1765	1759	2088	2693	2221	1706	1638	1091	1075
	2018	2019	2020	4400	4200	5400	5800	5200	3600	3800	5200	22600	11200	7200	8000
	2018	2019	2020	117120	78080	52480	56640	92480	112640	102080	59840	68480	70400	58240	41600
	2018	2019	2020	3934	4001	4947	5063	5319	5792	6348	6747	6084	5703	4875	4899
	2018	2019	2020	4145	3785	2672	2310	1609	1418	1448	1602	1420	1370	1778	2068
	2018	2019	2020	198835	79055	91099	89507	71243	74658	91841	89226	2063	61742	4823	78412
	2018	2019	2020	80640	71520	84480	77280	99840	100800	98880	96960	104160	87840	97920	99360
	2018	2019	2020	6177	6098	6796	7602	6702	7895	7827	7904	8752	9902	9508	10836
	2018	2019	2020	27120	21280	20080	18160	21280	29360	29040	28960	29040	24880	5600	33600
	2018	2019	2020	2210	2068	1962	2292	1988	1880	1913	92	459	445	165	20
	2018	2019	2020	2876	2562	3651	4322	4835	4541	4855	5224	4870	4978	4675	4613
	2018	2019	2020	111552	101184	100992	108672	114432	115200	122496	133056	137472	121920	111552	120576
	2018	2019	2020	125400	87600	105600	110400	57000	63600	97800	49200	35400	19800	40800	25800
	2018	2019	2020	37056	44160	44352	38016	33792	35328	12288	26496	30912	28608	32064	35904
	2018	2019	2020	11633	9036	8515	9524	7733	6741	7379	5253	3362	7393	8534	14292
	2018	2019	2020	910332	691473	685716	708873	701212	721541	791008	703741	633580	619419	539065	642175
	2018	2019	2020	905	921	457	817	817	780	714	733	846	833	796	725
	2018	2019	2020	852	810	785	932	1033	918	749	942	886	891	262	0
	2018	2019	2020	35	36	28	29	31	100	146	30	27	32	30	33
	2018	2019	2020	1021	672	734	829	895	1274	1572	1619	1568	1707	1241	830
	2018	2019	2020	1600	2400	1200	1600	800	1600	1600	2000	1600	1600	1200	1200
	2018	2019	2020	139	151	131	133	76	153	142	147	152	149	137	151
	2018	2019	2020	749	623	553	607	547	795	956	766	739	747	609	563
	2018	2019	2020	486	490	437	481	666	915	795	726	638	511	515	468
	2018	2019	2020	57	60	63	58	58	62	61	61	67	63	60	69
	2018	2019	2020	1852	2342	1693	1741	1914	2106	2351	2701	2305	2229	1877	1510
	2018	2019	2020	153	115	120	126	114	144	136	121	139	125	124	142
	2018	2019	2020	502	433	462	655	677	718	788	730	721	606	729	165
	2018	2019	2020	308	297	278	270	234	271	242	252	295	264	262	291
	2018	2019	2020	735	700	757	804	912	1037	1033	1128	1122	1041	740	880
	2018	2019	2020	1556	1222	1173	1358	1698	2419	2302	2130	2055	1744	1349	1632
	2018	2019	2020	922	945	1055	1055	1102	1494	1299	1287	1446	1267	959	975
	2018	2019	2020	1320	1330	1454	1535	1558	2150	1899	2003	2059	1735	1582	1702
	2018	2019	2020	948	887	1067	1079	1049	1620	1638	1692	1977	1165	822	754
	2018	2019	2020	169	145	145	159	146	136	223	219	251	252	235	248
	2018	2019	2020	0	0	0	0	0	0	0	0	0	0	0	0
	2018	2019	2020	532	495	477	576	665	764	996	1314	1133	1097	900	568
	2018	2019	2020	111	87	120	140	140	351	307	335	321	276	188	128
	2018	2019	2020	368	670	692	659	593	571	627	455	662	601	674	702
	2018	2019	2020	2266	2243	1977	2263	2225	2769	2535	2799	2539	2280	2112	2247
	2018	2019	2020	1966	1400	1337	1360	1278	1200	1310	1256	1393	1664	1492	1499
	2018	2019	2020	683	558	593	513	469	477	411	387	419	382	374	529
	2018	2019	2020	3399	3938	3276	3266	3420	4035	3953	4095	4491	3862	3354	3421
	2018	2019	2020	1985	1839	1031	1147	1371	1906	2312	1857	1623	1518	1279	1018
	2018	2019	2020	0	0	0	0	0	0	0	0	0	0	0	0
	2018	2019	2020	25619	25809	22095	24192	24488	30765	31097	31785	31474	28641	23902	22450
	2018	2019	2020	1281101	997848	1058534	692249	726852	1133789	1083084	1245871	1018986	1142215	1193335	1397071
	2018	2019	2020	1281101	997848	1058534	692249	726852	1133789	1083084	1245871	1018986	1142215	1193335	1397071
	2018	2019	2020	44964	9466	49385	76713	284581	175225	301946	388082	475795	397958	443360	
	2018	2019	2020	136388	79594	66334	50926	91085	176181	158846	117490	131798	55674	109123	59358
	2018	2019	2020	25061	0	75227	33150	22510	0	6566	34013	4301	28933	4102	0
	2018	2019	2020	419243	328021	163608	308275	366043	280883	205566	385846	298686	386971	327315	406643
	2018	2019	2020	297697	244386	219702	146878	204905	271920	278600	280577	263185	260084	249185	318412
	2018	2019	2020	455958	702065	430442	452426	445793	528096	478142	462890	516362	453035	452200	513716
	2018	2019	2020	299832	233203	232817	454406	429518	296422	342242	352231	334193	448654	342468	312816
	2018	2019	2020	158853	261719	97654	141243	148195	26294	2082	1722	1780	1766	113656	3106
	2018	2019	2020	250817	244888	151319	286752	258850	243002	91732	5579	5940	131812	208754	86648
	2018	2019	2020	273015	131064	0	210700	134334	78960	19394	180648	128812	88955	91263	107203
	2018	2019	2020	2361828	2234406	1486488	2161469	2385814	2076983	1814420	2122942	2073139	2331679	2296024	2251262
	2018	2019	2020	21682556	17239681	18949944	4398934	43639130	22263735	20472209	22796941	22424239	19948433	22888967	25098146
	2018	2019	2020	13025227	10746773	10700547	15258869	13196224	13103047	0	27132493	13200011	11714414	14223612	14181062

Service Address	Starting Year	Second Year	Final Year	kwh_201801	kwh_201802	kwh_201803	kwh_201804	kwh_201805	kwh_201806	kwh_201807	kwh_201808	kwh_201809	kwh_201810	kwh_201811	kwh_201812
	2018	2019	2020	20921239	14163446	14638639	24773457	16652947	18289507	21247683	18513721	18271763	19663500	18468135	19472234
	2018	2019	2020	0	0	0	25586	0	0	0	0	0	1347	0	0
	2018	2019	2020	1602551	1102205	1214604	1804230	1469010	1513424	1523129	1645715	1713230	1574111	1566242	1767930
	2018	2019	2020	1018209	853575	906375	1170372	951645	993645	1018191	1065402	1035786	987045	813618	956430
	2018	2019	2020	0	0	3688773	13792737	5376402	0	0	0	0	0	0	0
	2018	2019	2020	26843580	22132080	23363160	23337000	26075580	26200920	20693640	27606720	25936320	23362560	25337460	22565460
	2018	2019	2020	8122255	6808954	7165295	9550316	8390323	0	8329113	16398482	8119188	7483958	2178813	0
	2018	2019	2020	0	0	0	0	0	0	0	0	0	0	0	0
	2018	2019	2020	0	0	0	0	0	0	0	0	0	0	0	0
	2018	2019	2020	0	0	0	0	0	0	0	0	0	0	0	0
	2018	2019	2020	0	0	0	0	0	0	0	0	0	0	0	0
				93215617	73046714	80627337	94111501	115751261	82364278	73283965	115159474	90700537	84735368	85476847	84041262
	2019	2020	2021	76200	100800	58800	3000	29400	29400	73800	13800	31800	16800	50400	33000
	2019	2020	2021	125400	120000	102600	116400	112800	124800	114000	113400	125400	112800	103200	120600
	2019	2020	2021	0	180	0	0	180	0	180	0	0	0	0	0
	2019	2020	2021	0	0	0	0	0	0	0	0	0	0	0	0
				201600	220980	161400	119400	142380	154200	187980	127200	157200	129600	153600	153600
	2019	2020	2021	2400	1800	1800	2400	2400	3000	4800	4200	4800	4200	3600	2400
				2400	1800	1800	2400	2400	3000	4800	4200	4800	4200	3600	2400
	2019	2020	2021	780308	208965	101021	138425	114306	339715	435953	240664	100493	84179	80986	183462
	2019	2020	2021	5825	6640	5537	5126	29401	51291	14532	52522	224947	346327	315198	294816
				786133	215605	106558	143551	143707	391006	450485	293186	325440	430506	396184	478278
	2019	2020	2021	616754	617797	600788	616844	643136	635540	601787	662770	660552	670320	677643	666573
	2019	2020	2021	5782	4180	1188	1690	1699	11214	10123	731	1406	10578	6277	6065
	2019	2020	2021	75961	98012	120643	124957	145535	212872	168625	162510	189631	154060	146316	146650
				698497	719989	722619	743491	790370	859626	780535	826011	851589	834958	830236	819288
	2020	2021	2022	29120	22720	19200	25600	31200	37440	36480	31520	33920	35040	40000	33920
				29120	22720	19200	25600	31200	37440	36480	31520	33920	35040	40000	33920
				99664707	78211304	84931647	98871326	120832284	87930428	78608814	120696470	95992485	90438866	91093673	89968186

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties of record in this proceeding by facsimile transmission, hand delivery, electronic mail, overnight delivery or United States first class mail on this 11th day of July, 2019.

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