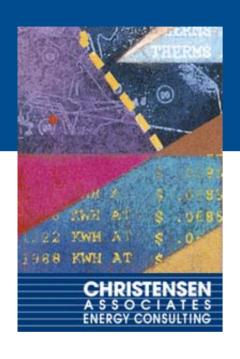
Kind Rebuttal

Attachment 1



Fixed Bill

Is Fixed Bill Penetration Approaching the "Tipping Point"?

Michael T. O'Sheasy Vice President Christensen Associates

February 27, 2007

Agenda

- □ What is Fixed Bill and Target Market
- □ Why offer Fixed Bill
- □ Fixed Bill Expectations
- Product Design and Risk Management
- □ Fixed Bill Implementation Issues
- Additional Fixed Bill Products

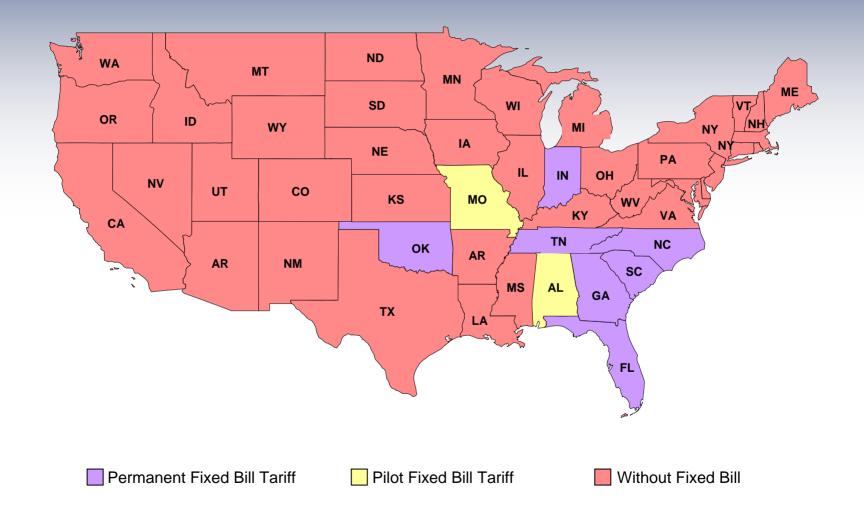
Customer Concerns and The Marketing Need

- □ Some customers want to know exactly how much they will be paying for utilities – No Surprises!
- □ They want a totally fixed bill with no possible bump or additional, after-the-fact charge when costs are higher than had been expected as found with Budget Billing
- Many customers dislike their bills for energy subject to the weather
- □ They are better able to manage their energy bills if the bills are spread equally over the year rather than spiking in certain months

Fixed Bill: A Classic Win-Win Product on the Verge of Market Prominence/The "Tipping Point"

- □ Fixed Bill is an exciting and remarkable pricing innovation!
- Customer is offered a fixed price for an entire billing period regardless of underlying costs and usage changes
- Conceived through market research directed at mass markets
- □ Will capture a large market share AND
- Provides a healthy return to the provider!

Electric Utilities Commission Approval Status Map



Program Design

Target Customers

- □ Residential/small commercial/midsize business
- □ At least one year history at current location
- Good credit history



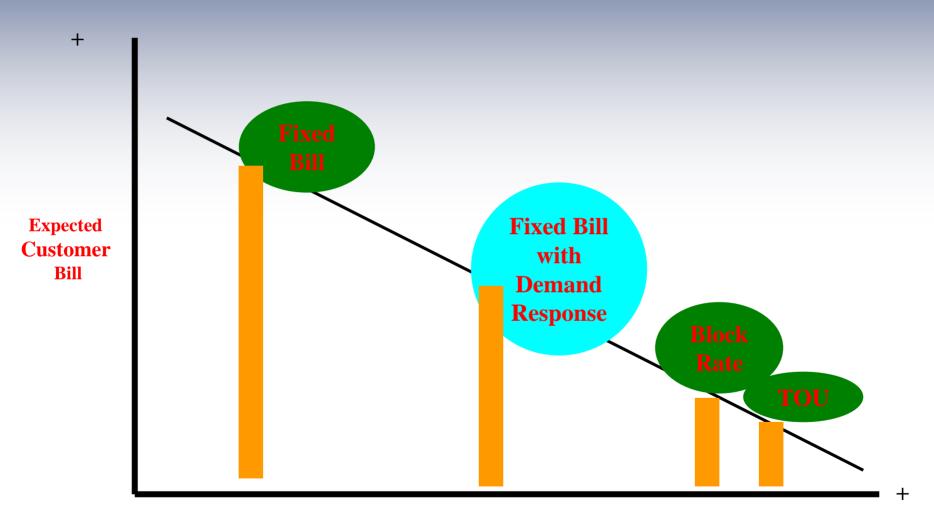


Why Should Utilities Offer Fixed Bill?

- Earnings
 - + \$1.3m EBIT per every 25,000
- Pricing product portfolio fit



Pricing Portfolio and Customer Risk



Risk to Customer

Why Offer Fixed Bill?

- Customer satisfaction
 - —High renewal rates
 - —Penetration rates of 7-15%

- **√** 95% of those surveyed said Flat Bill met/exceeded expectations
- **√71%** of those surveyed said they are very "likely" to renew; 1% "unlikely"

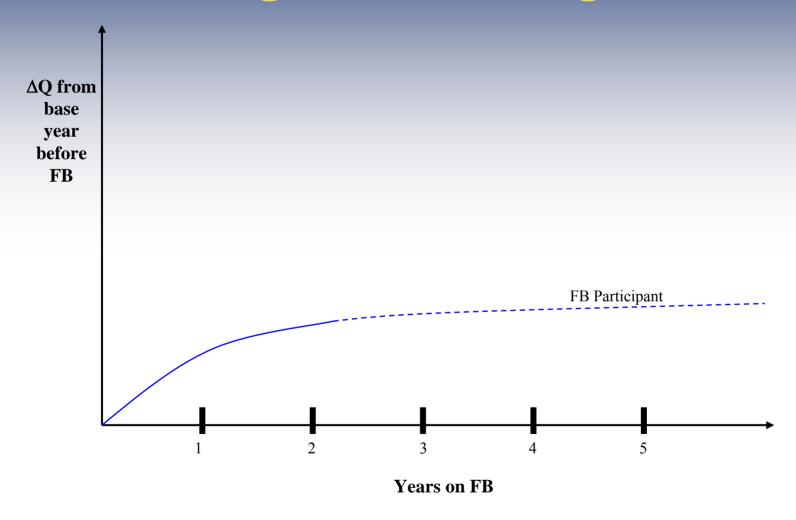


Why Offer Fixed Bill? Growth!

- Additional profitable kWh's
 - + shoulder and off-peak



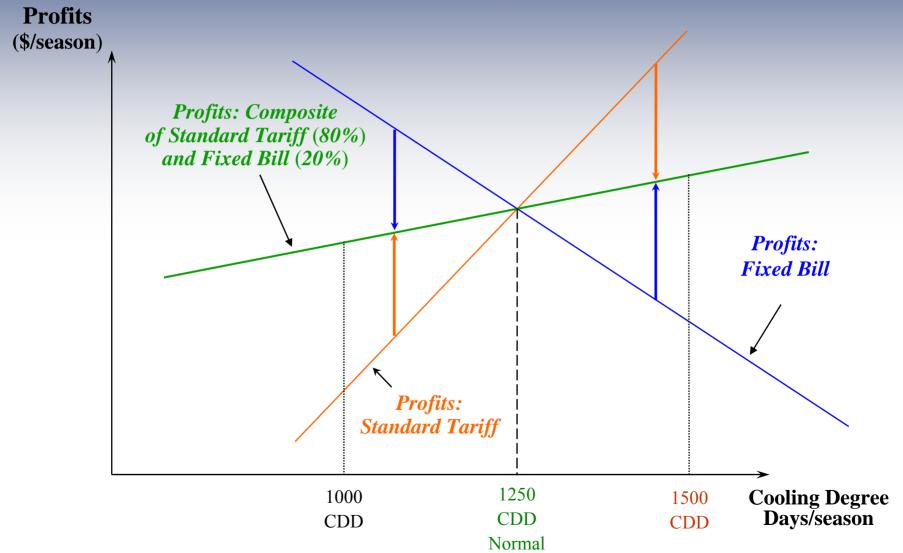
Fixed Bill Changes in kWh Usage



What to Expect from Fixed Bill?

- □ Healthy kWh growth mostly off-peak
 - Small CP effects
- High customer satisfaction and renewal
- □ Reduced deferral payments and bad debt
- Good penetration rates with attractive premiums
- Strong interest from budget pay customers
- Manageable risks
 - Natural hedge

Manageable Risks – Natural Hedge Joint Profits from Standard Tariff plus some Fixed Bill Customer



Bill Offer Computation Factors

Goal: Manage & control exposure while providing your customers what they want!

- Weather normalization
- Predict quantity change
- Risk premium
- Develop billing algorithm and software
- Track and recalibrate model (this optimizes product value)
 - -Consider segmentation



FlatBill Costing Methodology

■ Expected change in the customer's usage is incorporated into a quantity adjustment to the individual customer's normal-weather usage forecast under the standard tariff; then this usage is billed at the standard tariff

□ *Risk of departure* from those expected values are incorporated in the **risk premium**

Billing Offer System

Create billing computation formula:

- A_i = Weather normalized kWh monthly history for each individual customer i
- B = Moral hazard %
- C = Risk premium %
- D = Expected % natural kWh growth/customer
- E = Standard rate otherwise applicable, including any and all clauses such as fuel (exclude taxes and local franchise fees)

$$\sum_{i=\text{January}}^{\text{December}} \left\{ \left[A_i \times (1+B) \right] \times (1+D) \times E \right\} \times (1+C)$$

16

Risks of Departure from Expected Case

- □ **Price response** may be different from prediction
- Natural growth may be different from predicted
- Weather may be extreme
- Modeling recognizes that we may not fully capture customers' behavior
 - Includes any possible "selection bias"
- □ Regulated prices and fuel cost forecasts may change before end of contract period

Fixed Bill Risk

	1 st Year	Cumulative Over 5 Years	Any One Year
Expected Penetration =	9%	15%	
Expected EBIT =	\$1M	\$10.8M	
Worst Case EBIT =			(\$5.5M)
Best Case EBIT =			\$11.5M
Net Present Value =		\$7.8M	
Net Profit Likelihood =	68%	85%	

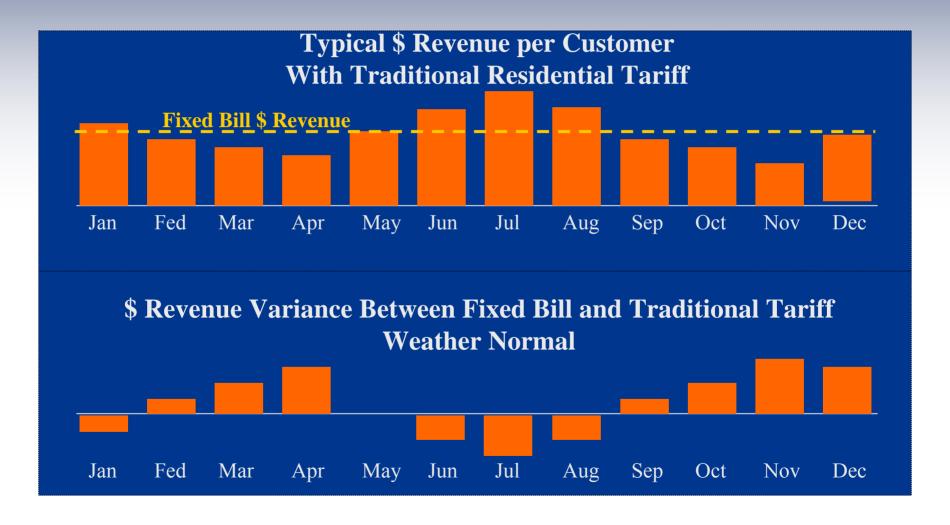
How to Manage Financial Issues

- □ Financial Hedges or Natural Hedge
 - —Option premium in Fixed Bill
- Premium flexibility
 - —Segmentation
- Rollout timing with phases
- □ Tracking and reporting software
- □ "Above-the-line or below" accounting

Fixed Bill Implementation Issues

- □ Cash flow and time value of money
- Product appeal and penetration
 - Greatest with summer offering for summer peaking utility
- □ Deferred credit resource?
- Bad credit resource?

Fixed Bill Implementation Issues Seasonality: "Keep the Faith" Summer Peaking Utility



Fixed Bill Implementation Issues

- □ Pilot or permanent initial rollout
- System load impacts
- □ Financial impacts
- Product design
 - Bill algorithm and seamless software for offer
 - Weather Normalization
 - Risk coverage and premium
 - Quantity change
 - Tariff design
 - Eligibility
 - Force majeure
 - Early termination
 - Budget billing
 - Goodness of fit
 - History and credit

Fixed Bill Implementation Issues

- Accounting
 - Above or below
- Regulatory approval
- □ Target Marketing
- Risk Management Committee and Hedging
- Dedicated Staff
 - Renewals
 - Recalibration
 - Segmentation
- □ Tracking software
 - Reporting
 - Algorithm enhancement

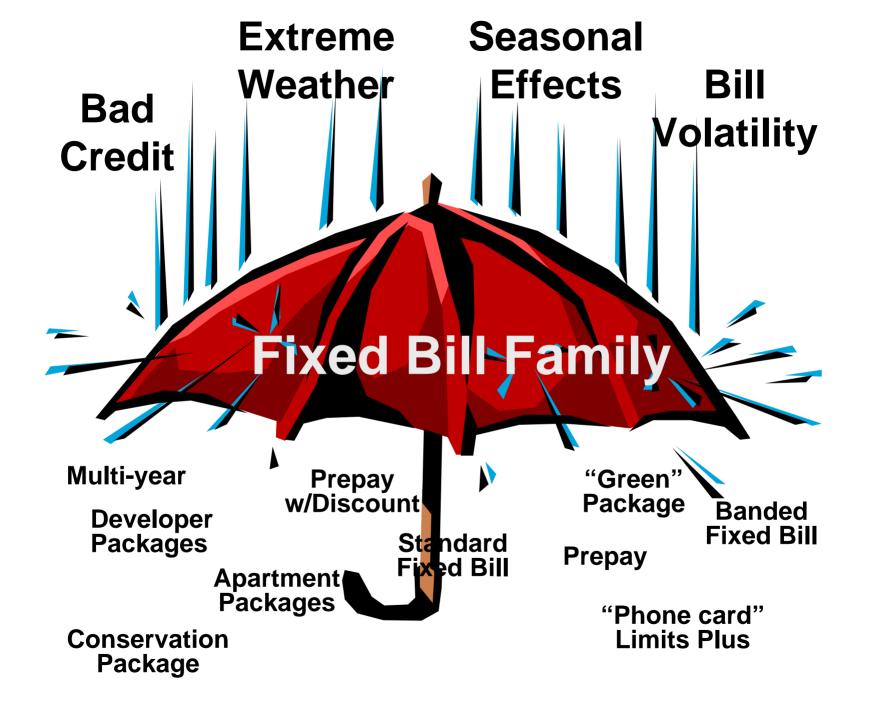
Implementation Challenge: How to Win Approval?

□ Internal Approval:

- Need a methodology and price components that are sound, reasonable and explainable
- Matches Company Risk Appetite including risk management committee
- Business Model with forecasts, budget, and tracking
- Regulatory approval and reporting

□ Regulatory Approval:

- Risk to non-participants
- Conservation and Clean Air
- Tracking and Reporting



Fixed Bill for Small to Mid-Size Business Customers





Marketing Basis

- Business customers want pricing choices
- Most business customers want simplicity and predictability
- □ Customers appreciate self design feature-Improves customer satisfaction
- Weather impacts, business impacts, and energy cost changes insured and guaranteed below ceiling
- □ Eliminates demand feature of traditional tariffs

Principles of Fixed Bill For Business

- □ Target market: small and medium size business customers
- Provides customers with
 - A constant bill amount with no true-up when usage remains below ceiling

Design Challenges

- □ Three Major Challenges
 - Risk Premium for usage below ceiling
 - Prices for any use above ceilings
 - Ceiling choices

Ceiling Choice Trade-offs



Level Playing Field

Fixed Bill For Business Offer Example

	Ceiling Choices			
	Annual Average: 10,000 kWh/month			
Number of Ceilings	Low 12,000 kWh	Moderate 15,000 kWh	High 17,000 kWh	
Annual	\$1000	\$1100	\$1200	
Seasonal	\$900	\$950	\$1050	
Monthly	\$800	\$850	\$980	

Structure

- □ Fixed Bill For Business offer fixed \$ amount—usage above ceiling on an incremental usage basis
- Excess kWh billed using flat TOU ¢/kWh; 30 cents/kWh on peak and 10 cents/kWh off peak
- No demand charge
- □ Initial size limitations
- □ kWh ceiling only; no kW ceiling
- Certain SIC Codes will find more appealing
- □ At least 12 months history
- □ Product encourages meter measurement software (Energy Direct/ Pulse option)
- □ 1 year contract—early termination rules
- Below-the-line (Risk Premium) risk treatment instead of Above-the-line
- Abuse provision

Time Line

- □ December 2005 Initial Tariff Design
- □ January 2006 Market Research
- □ February 2006 PSC Request
- □ May 2006 PSC approval
- □ June 2006 Solicit Pilot Participants
- □ August 1, 2006 Pilot Launch

Vice President of Marketing

to sincerely thank you yes all your experts an tehalf of the customers. I like to especially thank you goe the FlatBill Plan. I live on a gived iscome, my home is totally electric and its a constant struggle for me to handle try bell. If you check your records, you'll see what I mean! May Had rickly bless you, your co-warkers, and lack of your laved ones. there a wonderful day!