

Exhibit No.:

Issues: Rate Design

Witness: Janice Pyatte

Sponsoring Party: MO PSC Staff

Type of Exhibit: Rebuttal Testimony

Case No.: ER-2004-0570

Date Testimony Prepared: November 4, 2004

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

REBUTTAL TESTIMONY

OF

JANICE PYATTE

**Missouri Public
Service Commission**

FILED

DEC 28 2004

THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2004-0570

**Jefferson City, Missouri
November 2004**

Exhibit No. 69
Case No(s) ER-2004-0570
Date 12-06-04 Rptr xf

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

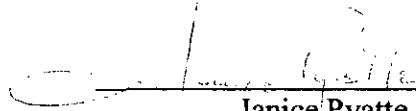
In the Matter of the tariff filing of The)
Empire District Electric Company to)
implement a general rate increase for retail)
electric service provided to customers in)
its Missouri service area)

Case No. ER-2004-0570

AFFIDAVIT OF JANICE PYATTE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Janice Pyatte, of lawful age, on her oath states: that she has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 10 pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.


Janice Pyatte

Subscribed and sworn to before me this 3rd day of November, 2004.


Notary Public

DAWN L. HAKE
Notary Public - State of Missouri
County of Cole
My Commission Expires Jan 9, 2005

My commission expires _____

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REBUTTAL TESTIMONY

OF

JANICE PYATTE

THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2004-0570

Q. Please state your name and business address.

A. My name is Janice Pyatte and my business address is Missouri Public Service Commission, P.O. Box 360, Jefferson City, Missouri 65102.

Q. Are you the same Janice Pyatte who previously filed prepared Direct Testimony on the issue of Revenues on September 20, 2004, and on the issue of Rate Design on October 4, 2004?

A. Yes, I am.

Q. What is the purpose of your Rebuttal Testimony?

A. My Rebuttal Testimony will address the rate design proposals and approach offered by The Empire District Electric Company ("EDE" or "Company") witness H. Edwin Overcast ("Dr. Overcast").

My Rebuttal Testimony will address Explorer Pipeline/Praxair ("Praxair") witness Maurice Brubaker's proposal to implement a high voltage credit to the Large Power rate schedule.

My testimony will present revised schedules containing revenues, kWh sales, and billing units by rate schedule that were originally filed in my Direct Testimony and have been subsequently updated.

Rebuttal Testimony of
Janice Pyatte

1 Q. Which schedules from your prepared Direct Testimony are you
2 presenting?

3 A. I am presenting updated versions of Schedule 2 (rate revenues) and
4 Schedule 3 (kWh sales) from my Direct filing on Revenues and Schedule 2 (billing units)
5 from my Direct filing on Rate Design. Minor changes to these schedules were made to
6 reflect computational errors discovered subsequent to the filing of Direct Testimony.
7 Rate Design revised Schedule 2 also incorporates the facilities demand units required for
8 Staff's proposed facilities charge.

9 **Rebuttal To EDE Witness H. Edwin Overcast**

10 Q. How is your rebuttal to Dr. Overcast's Direct Testimony organized?

11 A. Dr. Overcast has proposed to:

- 12 • Substantially increase the proportion of revenues recovered through
13 fixed charges and concomitantly substantially reduce the proportion of
14 revenues recovered through variable charges.
- 15 • Implement a declining-block energy charge in the summer for the
16 Residential and Small General Service rate schedules.
- 17 • Reduce the seasonal differential in existing energy rates.
- 18 • Eliminate the seasonal differential in existing demand rates.

19 Rather than address each proposal separately, I intend to focus on the inter-
20 relatedness of these proposals and what the results convey about Dr. Overcast's (and the
21 Company's) priorities. I will then address the one rate design proposal that I find most
22 objectionable.

Rebuttal Testimony of
Janice Pyatte

1 Q. Please describe the overall difference in approach between Staff and EDE
2 to the design of rates?

3 A. As Dr. Overcast's Direct Testimony has noted, there are a number of
4 objectives important to a sound rate design. Three of the objectives mentioned are:

- 5 • Cost of service (i.e., whoever causes the cost should pay the cost).
- 6 • Economic efficiency (i.e., prices based upon marginal cost).
- 7 • The impact of rate changes on customers' electricity bills.

8 Achieving each of these objectives, in and of itself, may be desirable, but the
9 reality is that one cannot simultaneously achieve all of these objectives. Choices need to
10 be made about the relative importance of each objective, and the resulting rate design will
11 vary based on those choices.

12 The rate design issue between the Staff and the Company that is being presented
13 to the Commission in this case is how to balance the many, sometimes contradictory,
14 objectives and, at the same time, collect the Commission-ordered revenues.

15 Q. What approach has Dr. Overcast recommended be used in the design of
16 the Residential and Small General Service rates?

17 A. Dr. Overcast has proposed a rate design for the Residential and Small
18 General Service rate schedules that consists of high customer charges, little or no
19 difference between summer and winter rate levels, and declining-block energy rates in
20 both seasons. These proposals, taken together, indicate that Dr. Overcast's primary
21 emphasis is on economic efficiency.

22 Q. What approach has Staff recommended be used in the design of the
23 Residential and Small General Service rates?

Rebuttal Testimony of
Janice Pyatte

1 A. Staff's rate design approach to the Residential and Small General Service
2 rate schedules is characterized by relatively low customer charges, summer rate levels
3 that are higher than winter rate levels, a flat summer energy rate, and a declining-block
4 winter energy rate. These proposals place more emphasis on cost of service, i.e.,
5 whoever causes the cost should pay the cost.

6 Q. Did either Dr. Overcast or Staff provide the Commission with information
7 on how its rate proposals will affect the annual electricity bills of individual customers?

8 A. No. It is unfortunate that the Commission has not been provided
9 quantitative measures of rate impact to use in its deliberations. Clearly both the Staff's
10 and the Company's proposed rate design changes will have a non-uniform effect on
11 customer bills, even if the overall revenue requirement were to remain unchanged. To
12 the extent that Staff's recommendations are similar to the existing rate design, rate
13 impacts will be much less extreme under Staff's proposal than under Company's
14 proposal.

15 Q. Please describe the issue between Staff and EDE regarding the rate
16 structure of the Residential and Small General Service rate schedules during the summer
17 billing months.

18 A. Under the current EDE residential (RG) and small general service (CB,
19 SH) rate schedules, each kWh of electricity used is priced at the same rate during the
20 summer billing months. This uniform rate-per-kWh is generally referred to as a "flat"
21 energy rate.

22 Under EDE's rate design proposal, summer electricity usage would be subject to
23 two different rates: one rate for an initial amount of electricity used and a second rate for

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Janice Pyatte

any usage in excess of the initial amount. This rate structure, known as a “blocked” rate structure, is as follows:

Rate Component	Current Summer Rate	EDE Proposed Summer Rate
First 600 kWh	7.19 cents per kWh	8.35 cents per kWh
Additional kWh	7.19 cents per kWh	6.06 cents per kWh

Since EDE is proposing that the price charged for usage in the second rate block be lower than the price charged for usage in the initial rate block, this proposal would generally be described as a “declining-block” rate structure.

The issue in this case is whether EDE should continue charging a uniform energy rate for each kWh of electricity usage used by small customers during the summer billing months or whether a declining-block rate structure, where customer usage in excess of an initial amount is priced at a lower rate, should be implemented.

Q. What effect does a declining-block rate structure have on the average price-per-kWh paid by each customer?

A. One characteristic of a declining-block rate structure is that, over a certain amount of usage within any given billing month, additional usage results in a lower average price per kWh. On a flat rate structure, increased usage is always charged the same rate per kWh. Thus the cost of increased usage is lower on a declining-block rate structure than in a flat rate structure.

Q. Why is Staff opposed to implementing a declining-block rate structure in the summer billing months for the Residential and Small General Service rate schedules?

A. One of the objectives of a sound rate design is that it send customers the proper “price signals” relating to consumption decisions. I believe that sending a price signal that, on a marginal basis, increased electrical usage is less costly is poor social

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Janice Pyatte

1 policy. Increased demand for electricity in the summer creates a need for additional
2 generation capacity and causes higher rates for all customers.

3 Q. Do other Missouri regulated utilities have declining-block rate structures
4 in the summer for Residential and Small General Service customers?

5 A. No. All but one of Missouri's regulated utilities charges a uniform rate-
6 per-kWh in the summer for residential and small general service customers. The one
7 exception is the residential rate schedule for Aquila Networks-MPS, which has an
8 inverted-block rate structure, where customer usage over an initial amount is priced at a
9 higher rate.

10 **Rebuttal To Explorer Pipeline/Praxair Witness Maurice Brubaker**

11 Q. What is the purpose of your rebuttal to the Direct Testimony of Explorer
12 Pipeline/Praxair witness Maurice Brubaker?

13 A. My Rebuttal Testimony addresses Mr. Brubaker's proposal to implement a
14 high voltage credit to the Large Power ("LP") rate schedule. There are two aspects of
15 this proposal that I will address: (1) whether implementing such a credit is appropriate;
16 and (2) how the value for such a credit should be determined.

17 Q. How do EDE's existing rate schedules address situations where customers
18 take service at a voltage level that is non-standard for the rate schedule?

19 A. EDE's existing Missouri rate schedules account for voltage level
20 differences (ownership of facilities) between non-residential customers through a series
21 of discounts and adders. The two most common voltage level scenarios are:

- 22 • Primary accounts served on a secondary rate schedule: discount of
23 21.1 cents per kW.

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Janice Pyatte

- Secondary accounts served on a primary rate schedule: adder of 20.5 cents per kW.

Whether a customer is considered to be primary or secondary depends on whether the customer owns its voltage transformation equipment (primary) or uses voltage transformation equipment provided by the Company (secondary). Rate schedules have been designed assuming that all customers are at the most common voltage level, and discounts and adders account for the customers who are exceptions. So, a primary customer (who does not use Company-owned voltage transformation equipment) served on a secondary rate schedule (which assumes the customer does use Company-owned voltage transformation equipment), is entitled to a discount. Conversely, a secondary customer (who uses Company-owned voltage transformation equipment) served on a primary rate schedule (which assumes the customer does not use Company-owned transformation equipment), is required to pay an additional amount ("adder") per kW. A primary customer served on a primary rate schedule would be considered a "standard" customer for billing purposes and would neither pay an extra amount nor receive a discount.

Q. Do EDE's existing Missouri rate schedules have a similar method for accounting for primary and transmission voltages?

A. The discount/adder method of accounting for voltage level differences between primary and transmission only partly exists on EDE's current Missouri rate schedules---primary accounts served on a transmission rate schedule pay an adder of 30 cents per kW.

Rebuttal Testimony of
Janice Pyatte

1 Mr. Brubaker's proposal is that an additional voltage-level scenario be added;
2 namely, transmission accounts served on a primary rate schedule should receive a
3 discount of \$1.50 per kW.

4 Q. What is Staff's position on the implementation of a high voltage credit to
5 the Large Power rate schedule?

6 A. As I stated in my Direct Rate Design Testimony on the treatment of
7 voltage level in EDE's existing rate design [page 16, line 10 through page 18, line 14], I
8 believe that it is appropriate that rate schedules account for voltage level differences
9 between customers. The argument in favor of a discount for transmission customers
10 (who do not use Company-owned substations) served on a primary rate schedule (which
11 assumes that customers do use Company-owned substations) is the same as the primary-
12 secondary argument. The difference is that the facilities in question are substations rather
13 than transformers.

14 Prior to reading Mr. Brubaker's Rate Design Testimony, I was unaware that there
15 were existing customers who qualify for service at transmission voltage that have opted
16 for service on the Large Power (primary) rate schedule rather than on the Special
17 Transmission rate schedule.

18 After verifying that three transmission voltage level customer accounts do exist, I
19 agree with Mr. Brubaker that a transmission voltage level credit to the LP rate schedule
20 should be implemented.

21 Q. Does Staff agree with Mr. Brubaker's recommendation that the
22 transmission voltage level credit should be valued at \$1.50 per kW?

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Janice Pyatte

1 A. No. I believe that Mr. Brubaker's analysis is flawed because it computes
2 the transmission discount based upon fully-allocated embedded cost, rather than the
3 replacement cost, of the facilities in question. Consequently, his proposed discount of
4 \$1.50 per kW is too high.

5 Q. What rate value would Staff recommend for a transmission voltage level
6 credit?

7 A. EDE's tariffs already provide for a 30 cents-per-kW adder for primary
8 accounts served on a transmission rate schedule. Staff recommends that a 30.1 cents-per-
9 kW discount be applied to transmission accounts served on a primary rate schedule.

10 Q. How should the existing Large Power rate schedule be modified to
11 accommodate transmission voltage level customers?

12 A. Staff recommends that the following provisions be added to the
13 Large Power rate schedule:

14 Substation Ownership: Where the Customer supplies all facilities (other than
15 metering equipment) for utilization of service at the Company's transmission line feeding
16 to such location, a reduction of 30.1 cents per kW will apply to the demand charge.

17 Metering Adjustment: The above rate applies for service at primary voltage.
18 Where service is metered at the voltage of the transmission line feeding to such location,
19 adjustment for billing will be made by decreasing metered kilowatt-hours and kilowatts
20 by 0.35%.

21 Q. If the Commission was to adopt Mr. Brubaker's \$1.50 per-kW
22 recommendation, how should the current 30 cents-per-kW adder on the transmission rate
23 schedules be adjusted?

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1 A. The adder should be adjusted to \$1.50[we need the correct number here]
2 per kW (voltage adjusted) to maintain symmetry.

3 Q. Has Staff computed the billing units that correspond to a transmission
4 voltage level discount?

5 A. Yes. I have modified Large Power billing units to reflect this situation.
6 These modified billing units are shown on Rate Design Revised Schedule 2, attached to
7 this testimony.

8 Q. Does this conclude your Rebuttal Testimony?

9 A. Yes, it does.

THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2004-0570
SUMMARY OF ANNUALIZED AND NORMALIZED RATE REVENUE

MISSOURI RETAIL

<u>Rate Schedule</u>	As Billed Rate Rev w/o taxes	Large Customer Annualizations	Normalization for Weather & Days	Additional Rev from Cust Growth	Total MO Normalized Rev
RG-Residential	\$108,083,194		\$564,747	\$1,996,854	\$110,644,795
CB-Commercial	\$24,774,766		\$255,170	\$325,542	\$25,355,478
SH-Small Heating	\$5,758,290		(\$1,485)	\$107,837	\$5,864,642
PFM-Feed Mill/Grain Elev	\$97,329		(\$738)		\$96,590
MS-Traffic Signals	\$44,850		(\$8)		\$44,842
GP-General Power	44,399,571	(\$734,734)	\$47,202	\$680,942	\$44,392,981
TEB-Total Electric Bldg	\$19,028,227		\$55,323	\$588,068	\$19,671,619
LP-Large Power	\$29,444,813	\$1,140,223			\$30,585,036
SC-P PRAXAIR (Firm)	\$2,421,236				\$2,421,236
PF-Elect Furnace Primary	\$100,591	(\$100,591)			\$0
SPL-Municipal St Lighting	\$1,100,382				\$1,100,382
PL-Private Lighting	\$3,031,871		(\$10,026)		\$3,021,846
LS-Special Lighting	\$149,330		(\$166)		\$149,164
CP-Cogeneration Purchase	(\$91)				(\$91)
Missouri Billed Rate Revenue	\$238,434,358	\$304,898	\$910,019	\$3,699,243	\$243,348,518
Interim Energy Charges	(\$452)	\$452			\$0
Excess Facilities Charges	\$1,647,865				\$1,647,865
Interruptible Credits	(\$443,232)	\$100,320			(\$342,912)
	\$239,638,539	\$405,669	\$910,019	\$3,699,243	\$244,653,470
Accounting Adjustment No.		S-1.7, S-1.1	S-1.5	S-1.6	

Revenues
Revised Schedule 2

THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2004-0570
SUMMARY OF ANNUAL KWH SALES

MISSOURI RETAIL

<u>Rate Schedule</u>	As Billed Sales (kWh)	Large Customer Annualizations	Normalization for Weather & Days	Additional kWh from Cust Growth	Total MO Normalized kWh
RG-Residential	1,534,753,115	-	6,966,728	28,366,419	1,570,086,262
CB-Commercial	308,174,613	-	3,637,672	4,056,942	315,869,227
SH-Small Heating	86,423,580	-	109,391	1,544,642	88,077,613
PFM-Feed Mill/Grain Elev	937,811	-	(18,190)	-	919,621
MS-Traffic Signals	738,689	-	(143)	-	738,546
GP-General Power	778,441,023	(12,881,720)	895,021	12,196,490	778,650,814
TEB-Total Electric Bldg	329,590,010	-	964,804	10,801,097	341,355,911
LP-Large Power	658,434,756	27,109,051	-	-	685,543,807
SC-P PRAXAIR Transmission	67,387,032	-	-	-	67,387,032
PF-Elect Furnace Primary	1,941,914	(1,941,914)	-	-	-
SPL-Municipal St Lighting	16,132,331	-	-	-	16,132,331
PL-Private Lighting	16,310,941	-	(155,894)	-	16,155,047
LS-Special Lighting	1,554,463	-	(2,832)	-	1,551,631
CP-Cogeneration Purchase	(3,903)	-	-	-	(3,903)
MO Retail Billed	3,800,816,375	12,285,417	12,396,557	56,965,590	3,882,463,939

THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2004-0570
SUMMARY OF ANNUAL KWH SALES

TOTAL COMPANY RETAIL

<u>Rate Schedule</u>	As Billed Sales (kWh)	Large Customer Annualizations	Normalization for Weather & Days	Additional kWh from Cust Growth	Total EDE Normalized kWh
RG-Residential	1,737,062,837	-	10,171,544	29,508,145	1,776,742,526
CB-Commercial	354,783,293	-	4,336,838	3,959,753	363,079,884
SH-Small Heating	89,799,819	-	82,524	1,572,307	91,454,650
PFM-Feed Mill/Grain Elev	937,811	-	(18,190)	-	919,621
MS-Traffic Signals	738,689	-	(143)	-	738,546
GP-General Power	872,203,636	(14,847,320)	817,052	10,688,248	868,861,616
TEB-Total Electric Bldg	344,606,868	-	968,028	11,864,930	357,439,826
LP-Large Power	796,530,500	29,928,203	-	-	826,458,703
SC-P PRAXAIR Transmission	67,387,032	-	-	-	67,387,032
PF-Elect Furnace Primary	1,941,914	(1,941,914)	-	-	-
SPL-Municipal St Lighting	19,228,638	-	-	-	19,228,638
PL-Private Lighting	19,374,522	-	(176,665)	-	19,197,857
LS-Special Lighting	1,819,990	-	(2,684)	-	1,817,306
CP-Cogeneration Purchase	(3,903)	-	-	-	(3,903)
MO Retail Billed	4,306,411,646	13,138,969	16,178,304	57,593,383	4,393,322,302

THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2004-0570
SEASONAL BILLING UNITS AND SEASONAL REVENUES BY RATE SCHEDULE

	RG	CB	SH	GP	TEB	LP	Praxair	SPL	PL	LS	MS	PFM	Total
Summer													
Cust \$	\$4,078,362	\$838,375	\$122,801	\$266,130	\$145,111	\$23,001	\$658	\$0	\$0	\$0	\$246	\$739	\$5,475,424
	\$8.75	\$12.32	\$12.32	\$44.73	\$44.73						\$12.32	\$18.48	
				\$164.53	\$164.53	\$164.53	\$164.53						
Std Bills	466,098.5	68,049.9	9,967.6	5,822.8	3,214.0						20.0	40.0	
IDR Bills	-	-	-	34.5	8.2	139.8	4.0						
Demand \$	\$0	\$0	\$0	\$5,157,810	\$1,472,610	\$4,601,831	\$473,006	\$0	\$0	\$0	\$0	\$0	\$11,705,257
				\$6.09	\$3.81	\$9.73	\$14.71						
				(\$0.211)	(\$0.211)	\$0.205							
							\$0.300						
Billing Demand				851,282.1	387,251.0	472,531.2	31,511.5						
Volt Disc/Adder (Prim. Sec)				125,583.7	13,346.7	20,008.7							
Volt Disc/Adder (Prim. Trans)						51,595.6	31,574.1						
Fac Demand (Proposed)				1,002,757.4	530,637.6	504,597.3							
Energy \$	\$40,336,373	\$10,042,110	\$2,359,079	\$14,162,723	\$7,157,048	\$7,887,180	\$477,543	\$365,903	\$1,002,100	\$72,238	\$14,709	\$37,132	\$83,914,139
	\$0.0719	\$0.0838	\$0.0838	\$0.0626	\$0.0734	\$0.0387	\$0.0293			\$0.1040	\$0.0598	\$0.1072	
	\$0.0719	\$0.0838	\$0.0838	\$0.0395	\$0.0464	\$0.0200	\$0.0175			\$0.0812		\$0.1072	
				\$0.0355	\$0.0418		\$0.0232						
Block1	243,135,892	30,469,124	5,722,694	119,514,107	56,362,202	163,873,760	4,262,868	4,785,686	5,404,508	286,507	245,971	23,561	
Block2	317,870,686	89,365,122	22,428,610	120,388,852	52,556,164	77,263,266	11,530,215			522,680		322,820	
Block3				54,247,337	13,910,428		6,502,680						
Sub Total	\$44,414,735	\$10,880,485	\$2,481,880	\$19,586,663	\$8,774,769	\$12,512,012	\$951,207	\$365,903	\$1,002,100	\$72,238	\$14,955	\$37,871	\$101,094,819
Winter													
Cust \$	\$8,145,962	\$1,677,058	\$247,793	\$532,864	\$283,744	\$46,041	\$1,316	\$0	\$0	\$0	\$431	\$1,479	\$10,936,688
	\$8.75	\$12.32	\$12.32	\$44.73	\$44.73						\$12.32	\$18.48	
				\$164.53	\$164.53	\$164.53	\$164.53						
Std Bills	930,967.1	136,124.8	20,113.1	11,873.8	6,282.8						35.0	80.0	
IDR Bills				65.0	16.5	279.8	8.0						
Demand \$	\$0	\$0	\$0	\$6,988,521	\$2,499,800	\$4,807,885	\$645,087	\$0	\$0	\$0	\$0	\$0	\$14,941,293
				\$4.76	\$3.13	\$5.37	\$9.99						
				(\$0.211)	(\$0.211)	\$0.205							
							\$0.300						
Billing Demand				1,478,581.9	800,378.7	893,884.6	62,676.2						
Volt Disc/Adder (Prim. Sec)				234,733.3	25,522.3	37,679.2							
Volt Disc/Adder (Prim. Trans)						106,952.0	63,173.8						
Fac Demand (Proposed)				1,993,673.3	1,048,927.2	1,009,478.4							
Energy \$	\$58,146,253	\$12,826,256	\$3,089,327	\$17,253,423	\$8,117,035	\$13,141,351	\$823,582	\$734,478	\$2,019,746	\$63,953	\$29,465	\$57,978	\$116,302,847
	\$0.0719	\$0.0838	\$0.0838	\$0.0368	\$0.0384	\$0.0341	\$0.0202			\$0.1040	\$0.0598	\$0.1072	
	\$0.0452	\$0.0570	\$0.0436	\$0.0355	\$0.0362	\$0.0192	\$0.0165			\$0.0812		\$0.0973	
				\$0.0346	\$0.0350								
Block1	468,282,774	60,744,591	11,770,492	208,636,362	114,073,487	309,311,433	21,507,012	11,346,645	10,906,402	295,930	492,718	43,670	
Block2	541,520,383	135,716,827	48,233,021	199,926,357	87,861,600	135,095,348	23,584,257			408,580		547,760	
Block3				71,624,841	15,886,389								
Sub Total	\$66,292,215	\$14,503,313	\$3,337,120	\$24,774,808	\$10,900,580	\$17,995,276	\$1,469,986	\$734,478	\$2,019,746	\$63,953	\$29,895	\$59,457	\$142,180,828
Total	\$110,706,950	\$25,383,798	\$5,819,000	\$44,361,471	\$19,675,349	\$30,507,288	\$2,421,193	\$1,100,382	\$3,021,846	\$136,192	\$44,850	\$97,329	\$243,275,647
Non-Billing Unit \$	(\$62,155)	(\$28,320)	\$45,642	\$31,507	(\$3,730)	\$77,748	\$43	\$0	\$0	\$12,972	(\$8)	(\$739)	\$72,960
Grand Total	\$110,644,795	\$25,355,478	\$5,864,642	\$44,392,978	\$19,671,619	\$30,585,036	\$2,421,236	\$1,100,382	\$3,021,846	\$149,164	\$44,842	\$96,590	\$243,348,607

Rate Design
Revised Schedule 2