

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA )  
PUBLIC SERVICE COMPANY FOR (1) )  
APPROVAL OF A TRANSMISSION, )  
DISTRIBUTION AND STORAGE SYSTEM )  
IMPROVEMENT CHARGE ("TDSIC") )  
RATE SCHEDULE, (2) APPROVAL OF )  
PETITIONER'S PROPOSED COST )  
ALLOCATIONS, (3) APPROVAL OF THE )  
TIMELY RECOVERY OF TDSIC COSTS )  
THROUGH PETITIONER'S PROPOSED )  
TDSIC RATE SCHEDULE, AND (4) )  
AUTHORITY TO DEFER APPROVED )  
TDSIC COSTS, PURSUANT TO IND. )  
CODE CH. 8-1-39. )

CAUSE NO. 44371

TESTIMONY OF

ERIC M. HAND – PUBLIC'S EXHIBIT NO. 3

ON BEHALF OF THE

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

OCTOBER 11, 2013

Respectfully submitted,



Randall C. Helmen, Atty. No. 8275-49  
Deputy Consumer Counselor

## CERTIFICATE OF SERVICE

This is to certify that a copy of the *OUCC Testimony of ERIC M. HAND* has been served upon the following parties of record in the captioned proceeding by electronic service on October 11, 2013.

### *NIPSCO*

NiSource Corporate Services - Legal  
Erin Casper Borissov  
Frank A. Shambo  
150 W. Market St., Suite 600  
Indianapolis, IN 46204  
[eborissov@nisource.com](mailto:eborissov@nisource.com)  
[fshamb@nisource.com](mailto:fshamb@nisource.com)

### *Industrial Group*

Lewis & Kappes  
Jennifer Wheeler Terry  
Bette J. Dodd  
One American Square, 1700, PO Box 82053  
Indianapolis, IN 46282 – 0003  
[jterry@lewis-kappes.com](mailto:jterry@lewis-kappes.com)  
[bdodd@lewis-kappes.com](mailto:bdodd@lewis-kappes.com)

### *CAC*

Citizens Action Coalition of Indiana, Inc.  
Jennifer A. Washburn  
603 E. Washington St. Suite 502  
Indianapolis, IN 46204  
[jwashburn@citact.org](mailto:jwashburn@citact.org)

### *LaPorte County*

Friedman & Associates, P.C.  
Shaw R. Friedman  
705 Lincolnway  
LaPorte, IN 46350  
[sfriedman.associates@verizon.net](mailto:sfriedman.associates@verizon.net)

### *IMUG*

Robert Glennon & Assoc., P.C.  
Robert M. Glennon  
3697 N. Co. Rd. 500 E.  
Danville, Indiana 46122  
[glennon@iquest.net](mailto:glennon@iquest.net)

### *Dean-Webster Wright LLP*

Robert W. Wright  
Deanna A. Dean-Webster  
50 South Meridian Street, Suite 500  
Indianapolis, IN 46204  
[wright@dwwlegal.com](mailto:wright@dwwlegal.com)  
[dean@dwwlegal.com](mailto:dean@dwwlegal.com)

### *Hoosier Environmental Council*

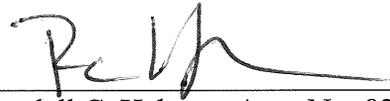
Robert K. Johnson, Esq.  
2454 Walden Drive  
Greenwood, IN 46143  
[rjohnson@utilitylaw.us](mailto:rjohnson@utilitylaw.us)

### *NLMK*

Lewis & Kappes, P.C.  
Richard E. Aikman, Jr.  
One American Square, Ste. 2500  
Indianapolis, Indiana 46282  
[raikman@lewis-kappes.com](mailto:raikman@lewis-kappes.com)

*US Steel*  
Bose McKinney & Evans  
Nikki G. Shoultz  
L. Parvin Price  
111 Monument Circle, Suite 2700  
Indianapolis, IN 46204  
[nshoultz@boselaw.com](mailto:nshoultz@boselaw.com)  
[pprice@boselaw.com](mailto:pprice@boselaw.com)

Brickfield, Burchette, Ritts & Stone, P.C.  
James Brew  
1025 Thomas Jefferson Street, N.W., 8th Floor  
Washington, DC 20007  
[jbrew@bbrslaw.com](mailto:jbrew@bbrslaw.com)



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Randall C. Helmen, Atty. No. 8275-49  
Deputy Consumer Counselor

**INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR**

115 West Washington Street  
Suite 1500 South  
Indianapolis, IN 46204  
[infomgt@oucc.in.gov](mailto:infomgt@oucc.in.gov)  
317/232-2494 – Telephone  
317/232-5923 – Facsimile

**TESTIMONY OF OUCC WITNESS ERIC M. HAND**  
**CAUSE NO. 44371**  
**NORTHERN INDIANA PUBLIC SERVICE COMPANY**

**I. INTRODUCTION**

1   **Q:   Please state your name and business address.**

2   A:   My name is Eric Mark Hand, and my business address is 115 W. Washington  
3       Street, Suite 1500 South, Indianapolis, IN 46204.

4   **Q:   By whom are you employed and in what capacity?**

5   A:   I am employed as a Utility Analyst in the Office of Utility Consumer Counselor's  
6       (OUCC) Electric Division.

7   **Q:   Would you summarize your educational background?**

8   A:   I graduated from Rose-Hulman Institute of Technology with a Bachelor of  
9       Science degree in Mathematical Economics. I received a Masters in Business  
10      Administration from Indiana University with majors in Management, Marketing,  
11      and International Business.

12  **Q:   Please describe your professional experience.**

13  A:   I have been an OUCC Electric Division Utility Analyst for nearly four years and  
14      have participated in various proceedings, including rate cases and cases involving  
15      utility planning, special contracts, economic development rates/riders, and other  
16      tariff-related matters. Prior experience included a 30-year automotive industry  
17      career with General Motors Corporation's Allison Transmission Division. I held  
18      administrative positions in manufacturing, engineering, and contracts, culminating  
19      in management positions in finance, contracts, and information technology.

1           Additionally, I have served the last 13 years on the Board of Trustees of the  
2           largest regional wastewater district in Indiana.

3   **Q:   Have you previously provided testimony to the Indiana Utility Regulatory**  
4   **Commission (Commission or IURC)?**

5   A:   Yes. I testified previously in Cause Nos. 43839, 43953, 44075, 44258 and special  
6           contract causes.

7   **Q:   What is the purpose of your testimony in this proceeding?**

8   A:   My testimony:

- 9           1. Provides a historical basis for the Northern Indiana Public Service  
10           Company's (Petitioner or NIPSCO) current class cost of service allocators  
11           and methodology;
- 12           2. Evaluates Petitioner's proposed Transmission, Distribution and Storage  
13           System Improvement Charge (TDSIC) allocators set forth in this petition;
- 14           3. Evaluates Petitioner's proposed cost allocation "adjustments"; and
- 15           4. Demonstrates that Petitioner's TDSIC proposal is non-compliant with  
16           Indiana law (Ind. Code § 8-1-39-9(a)(1)) and with the requirements found  
17           in the Commission's Final Order in NIPSCO's most recent base rate case,  
18           Cause No. 43969.

19   **Q:   What did you do to prepare to testify?**

20   A:   I reviewed the Verified Petition and Direct Testimony submitted by the Petitioner  
21           in this Cause. I also reviewed portions of previous NIPSCO base rate cases,  
22           including Cause Nos. 43969 and 43526, and Ind. Code § 8-1-39. In addition, I  
23           attended TDSIC meetings between OUCC staff and NIPSCO staff. Finally, I

1 submitted data requests, reviewed responses to those requests and discussed  
2 various aspects of this case with other OUCC staff.

3 **Q: What is Petitioner requesting in this Cause?**

4 A: Petitioner requests approval of a TDSIC submitted pursuant to Ind. Code § 8-1-  
5 39. Part of the proposal seeks approval of adjustments to the customer class  
6 revenue and cost allocators that were approved in Cause No. 43969.

## II. COST ALLOCATION AND METHODOLOGY HISTORY

7 **Q: What has been the historical basis for determining NIPSCO's allocators?**

8 A: At least since the 1980s, in base rate cases the Commission has determined class  
9 allocators for the NIPSCO electric system by primarily using 12 Coincident Peak  
10 (CP) methodology for production and transmission allocations. In its final order in  
11 Cause No. 43526, a previous NIPSCO base rate order, the Commission stated the  
12 following:

13 In the most recently contested electric utility rate proceeding, we noted  
14 in our Order that "a change in the cost allocation methodology can have  
15 significant impacts on customer classes, and, thus, such a change should  
16 not be lightly undertaken, especially where, as here, so much of PSI's  
17 plant was in service at the time of its last rate case and costs were  
18 assigned using the 12-CP methodology in that case." Cause No. 42359  
19 at 102. Here, the record indicates that NIPSCO's current rates reflect a  
20 12 CP methodology as approved in Cause No. 37023, and adjusted  
21 across-the-board in Cause No. 38045, and any departure can have  
22 significant impacts and should not be undertaken lightly.

\*\*\*\*

23 This Commission has a long and consistent practice of allocating  
24 generation and transmission costs on some measure of coincident peak  
25 and precedent must factor into our final decision. Given that our last  
26 Order found 12 CP methodology appropriate, ..., we find no reason to  
27 move to a different allocation methodology in this Cause. Moreover, our  
28 preference is to utilize the previously approved allocation methodology,  
29 given sufficient evidence, unless system operating characteristics are  
30 demonstrated to have changed since the last approved cost of service  
31 study allocation methodology. Accordingly, we direct NIPSCO to

1 utilize a 12 CP study as the initial basis on which to determine class  
2 revenue responsibilities.

3 Cause No. 43526 at 85.

4 In Cause No. 43969, NIPSCO presented a cost of service study that  
5 recommended a 12 CP methodology be approved. However, in a Settlement  
6 Agreement reached between NIPSCO, the OUCC, and other Intervening Parties,  
7 the settling parties developed and agreed to a revenue allocation by and among  
8 NIPSCO's customer classes. The Commission approved the parties' agreement as  
9 to such revenue allocation and noted in various parts of the Final Order as  
10 follows:

11 1. E. Cost Allocation and Rate Design. The Settling Parties agreed  
12 that rates should be designed in order to allocate the revenue  
13 requirement to and among NIPSCO's customer classes in a fair and  
14 reasonable manner. ... Joint Exhibit C attached to the Settlement is  
15 a table that contains the percentages and dollar amounts of revenue  
16 allocated to the various customer classes. ... The Settling Parties  
17 agreed that the proposed cost allocation results in fair and  
18 reasonable rates and charges.

19 Cause No. 43969 at 9.

20 2. The Settling Parties chose to allocate revenue by class in a manner  
21 designed to mitigate the level of the increase to any one customer  
22 class. .... Given the diverse nature of the Settling Parties, and their  
23 willingness to agree to the proposed allocation of revenue, and  
24 given that no party to this proceeding provided evidence in  
25 opposition to the proposed allocation of revenue, we find that the  
26 proposed allocation of revenue is supported by substantial evidence  
27 of record and is appropriate for development of NIPSCO's retail  
28 rates and charges.

29 *Id.* at 66.

30 3. Accordingly, we give substantial weight to the Settling Parties'  
31 agreement with respect to revenue allocation. We find that the  
32 Settlement revenue allocation constitutes just and reasonable rates  
33 under Ind. Code § 8-1-2-4. However, we order NIPSCO, in its next

1 rate case filing, to base its proposed rates on a cost of service  
2 analysis.

3 *Id.* at 67.

4 In summary, in contested rate cases, the Commission has consistently determined  
5 that NIPSCO's cost allocations by customer classes should be determined by  
6 using 12 CP methodology supported by a full cost of service study. NIPSCO's  
7 current TDSIC proposal is incongruent with the Commission's prior orders.

### III. EVALUATION OF PROPOSED TDSIC ALLOCATORS

8 **Q: Does the OUCC consider Petitioner's proposed TDSIC allocation**  
9 **adjustments to be appropriate?**

10 A: No. NIPSCO has not demonstrated that its electric system has changed  
11 significantly since the time of the Settlement Agreement approved in Cause No.  
12 43969. Moreover, NIPSCO submitted no evidence or cost of service study to  
13 invalidate the cost allocations approved by the Commission in Cause No. 43969  
14 or in favor of the specific TDSIC proposed class allocation adjustments the  
15 company proposed in this Cause.

16 **Q: What are the primary differences between NIPSCO's proposed TDSIC**  
17 **allocators and the allocators approved by the Commission in NIPSCO's last**  
18 **base rate case?**

19 A: Contrary to the Settlement Agreement's terms, NIPSCO's proposed allocators  
20 would promote cost segregation in determining whether a project is transmission  
21 or distribution related. In addition, NIPSCO proposes allocation "adjustments"  
22 that would reduce cost allocations to some classes, necessitating increased  
23 allocations to other classes in order to maintain the same total revenue  
24 requirement.

1 **Q: Does categorization as to transmission or distribution decrease system costs?**

2 A: No.

3 **Q: In support of its TDSIC proposal, did NIPSCO provide economic or**  
4 **engineering evidence of a need to change allocation methodology or**  
5 **demonstrate potential total system gains to be achieved by doing so?**

6 A: As mentioned before, no, it did not.

7 **Q: What are the approved allocators from the most recent base rate Cause No.**  
8 **43969?**

9 A: Cause No. 43969 Rate Case sets forth two tables of approved allocators for  
10 NIPSCO's customer classes. (See Joint Exhibit C "Allocation of Base Rate  
11 Revenue Requirement," attached hereto as Exhibit EMH-1; and Joint Exhibit E  
12 "Demand Allocators" for purposes of the RTO Tracker and RA Tracker, attached  
13 hereto as Exhibit EMH-2)

14 **Q: What are the allocators proposed in this TDSIC filing (44371)?**

15 A: NIPSCO's case-in-chief in this proceeding presents two tables of proposed  
16 TDSIC allocators: "Transmission Allocators" (Petitioner's Exhibit No. DJI-1,  
17 Exhibit 2, Schedule 4, Page 2) and "Distribution Allocators" (Petitioner's Exhibit  
18 No. DJI-1, Exhibit 2, Schedule 4, Page 1).

19 **Q: What are the differences between the base rate case approved allocators and**  
20 **the NIPSCO proposed TDSIC allocators?**

21 A: The following table illustrates a comparison between the percentage of total by  
22 customer class for each of the four sets of allocators described above. NIPSCO's  
23 proposed allocators would favor large industrial customers (Rate classes 632, 633  
24 and 634) via reduced or eliminated allocations, while being unfavorable to non-  
25 industrial customers (especially Rate class 611, or residential customers) via  
26 increased allocations.

**ALLOCATOR COMPARISON**

Class	Joint Exhibit C Approved 43969 % of Total	Joint Exhibit E Approved 43969 % of Total	NIPSCO Proposed Transmission % of Total	NIPSCO Proposed Distribution % of Total
611	27.882	27.03	28.68	37.86
612	0.381	0.36	0.39	0.52
613	0.090	0.08	0.09	0.12
617	0.006	0.02	0.01	0.01
620	0.046	0.08	0.05	0.06
621	13.223	9.93	13.60	17.96
622	0.088	0.10	0.09	0.12
623	11.585	10.90	11.92	15.73
624	14.203	11.80	14.61	19.29
625	0.235	0.32	0.24	0.32
626	4.371	4.61	4.50	5.94
632	10.400	15.05	9.24	0.00
633	8.968	11.12	9.22	0.00
634	6.992	7.99	5.79	0.00
641	0.174	0.13	0.18	0.24
642	0.006	0.00	0.01	0.01
644	0.137	0.10	0.14	0.19
650	0.654	0.10	0.67	0.89
655	0.068	0.06	0.07	0.09
660	0.164	0.03	0.17	0.22
Interdepartmental	0.325	0.21	0.33	0.44
Total	100.000	100.00	100.00	100.00

1 **Q: Were transmission and distribution costs considered and segregated in the**  
2 **Cause No. 43969 Settlement?**

3 **A:** Transmission and distribution costs were considered as part of total costs.  
4 Accordingly, such costs would be part of the total revenue requirements allocated  
5 by Joint Exhibit C to all customer classes. The Settlement Agreement does not  
6 contemplate segregation by transmission or distribution, nor countenance  
7 “adjustments” to exempt or exclude certain classes from allocations. Thus,  
8 transmission and distribution costs, including the allocation to all customer

1 classes in accordance with Joint Exhibit C, were part of the Cause No. 43969  
2 Settlement Agreement and were approved by the Commission.

3 **Q: Is there an advantage to reallocation via transmission or distribution**  
4 **categorization?**

5 A: Not as a total system. However, from a self-interest perspective as a single class  
6 or single customer, there is a distinct advantage if one's cost allocation decreases.

7 **Q: Is there a disadvantage to reallocation via transmission or distribution**  
8 **categorization?**

9 A: Yes. From a self-interest perspective as a single class or single customer,  
10 obviously one would be adversely impacted if one's class cost allocation is  
11 increased. Allocating the revenue requirements in new ways and allowing  
12 "adjustments" to shift cost allocations among customer classes ignores the  
13 commitments set in the Settlement Agreement approved by the Commission.  
14 Frankly, it disincentivizes interest in forging settlements when a utility like NIPSCO  
15 seeks to disavow the cost allocation provisions contained in a settlement entered  
16 into less than two years ago.

#### **IV. EVALUATION OF PROPOSED ALLOCATION "ADJUSTMENTS"**

17 **Q: Please explain your term "adjustments."**

18 A: NIPSCO uses the word "adjustments" to describe its proposed allocation changes.  
19 Semantically, adjustments might be perceived as small changes or minor  
20 corrections for greater accuracy or improvement to be viewed favorably.  
21 However, in the case of the TDSIC proposal, NIPSCO's "adjustments" should  
22 more correctly be called exemptions, exclusions or waivers, which can be  
23 favorable or unfavorable to a customer class, depending upon whether that class is

1 being exempted or excluded from positive or negative results. In this TDSIC  
2 proposal, NIPSCO's "adjustments" (exemptions/exclusions/waivers) unfairly and  
3 unreasonably shift cost allocations from large industrial customers onto non-  
4 industrial (especially residential) customers.

5 **Q: Please describe the OUCC's concerns more specifically with regard to**  
6 **NIPSCO's proposed TDSIC "adjustments."**

7 **A:** The OUCC opposes the "adjustment" (reduction) of the allocators in favor of  
8 interruptible customers (rate classes 632 and 634) as shown in NIPSCO's  
9 proposed Transmission Allocator and the "adjustment" (exemption/exclusion)  
10 allocators in favor of large industrial customers (rate classes 632, 633, and 634) as  
11 shown in NIPSCO's proposed Distribution Allocator.

12 The issue of interruptibility was extensively considered in Cause No.  
13 43969 proceedings and in the settlement eventually reached in that case and  
14 approved by the Commission. There were lengthy negotiations regarding  
15 interruptibility factors, including, but not limited to magnitude, frequency,  
16 duration, notification requirements, responsiveness, value to the system,  
17 compliance, and appropriate compensation. Rider 675 was created with four  
18 different categories to enable a diversity of potential participation levels and  
19 appropriate compensation levels in order to meet the needs of the overall system,  
20 as well as the needs or capabilities of the potential participants. Since the  
21 approved settlement included compensation for interruptibility, that topic should  
22 not be revisited at this time for consideration of additional, enhanced  
23 compensation without the benefit of a full cost-of-service study within the context  
24 of a future base rate case for NIPSCO to support such a modification. As stated

1 in Cause No. 43969 (Final Order at 69): "Absent a cost-of-service study that  
2 accounts for the true cost for NIPSCO to provide interruptible service, Rider 675  
3 provides a reasonable basis for interruptible customers to benefit from the ability  
4 to be interrupted." Interruptible benefits were included in the 43969 Settlement  
5 Agreement. NIPSCO's attempt to reallocate and provide further interruptible  
6 compensation should be denied.

7 The OUCC also opposes NIPSCO's proposed "adjustment" whereby its  
8 large industrial customers (rate classes 632, 633, and 634) would be  
9 exempted/excluded from distribution cost allocations under NIPSCO's proposed  
10 Distribution Allocator. Distribution costs were included in the Settlement  
11 Agreement in Cause No. 43969. Since there were only two approved allocators  
12 (Joint Exhibits C and E) and both were allocators applicable to all classes,  
13 distribution costs were allocated to all classes. The Settlement Agreement  
14 approved by the Commission did not include any exclusions, waivers, exceptions  
15 or other "adjustments" for distribution costs. The Final Order in Cause No. 43969  
16 requires a full cost-of-service study by NIPSCO before its next base rate case.  
17 However, NIPSCO is now seeking to change its allocations outside of a rate case  
18 and without the benefit of a cost-of-service study for the Commission to examine.

V. NIPSCO'S PROPOSAL DOES NOT MEET THE REQUIREMENTS OF THE  
TDSIC STATUTE

19  
20 **Q: Do NIPSCO's proposed TDSIC Transmission and Distribution Allocators**  
21 **meet the requirements of the TDSIC statute?**

22 A: No. Ind. Code § 8-1-39-9(a), in pertinent part, states: "The petition must: (1) use  
23 the customer class revenue allocation factor based on firm load approved in the

1 public utility's most recent retail base rate case order;...." This requirement has  
2 not been met by NIPSCO in the following particulars:

- 3 1. The only customer class allocators approved in Cause No. 43969,  
4 NIPSCO's most recent retail base rate case, were the allocators set forth in  
5 Joint Exhibit C and Joint Exhibit E of the Settlement Agreement.
- 6 2. Joint Exhibit C attached to the Settlement is a table that contains the  
7 percentages and dollar amounts of revenue allocated to the various  
8 customer classes." Cause No. 43969 (Final Order at 9).
- 9 3. The TDSIC statute requires a revenue allocation factor "based on firm  
10 load," but does not state "only or solely based on firm load." The  
11 allocations approved in the Settlement Agreement were based on all the  
12 other appropriate factors and components considered in a rate case,  
13 including firm load.
- 14 4. NIPSCO's proposed TDSIC Transmission and Distribution allocators were  
15 not contemplated, not proposed, not evaluated, and were not approved in  
16 NIPSCO's most recent retail base rate case.

17 **Q: Are there other reasons for not approving this TDSIC proposal?**

18 A: Yes. First, approval of this TDSIC Petition, as proposed, could be detrimental to  
19 the feasibility and probability of future potential settlements for any utility.  
20 NIPSCO's most recent base rate case was complex, contentious, protracted, and  
21 costly; but the parties finally reached a settlement of the issues which was  
22 subsequently approved by the Commission. Second, approval of the pertinent  
23 relief requested in this Petition would interject unsupported new customer class

1 allocators for future TDSIC activities, thereby undercutting applicable revenue  
2 allocation factors set forth in the Settlement Agreement. To allow NIPSCO to  
3 substantially alter those allocators would not only be inconsistent with the TDSIC  
4 statute's requirements, but also promote bad public policy that is not in the public  
5 interest.

## VI. RECOMMENDATIONS

6 **Q: What are the OUCC's recommendations regarding revenue and cost**  
7 **allocations to apply in this Cause?**

8 A: The OUCC recommends that the IURC:

9 1. Deny Petitioner's request to apply the allocators proposed by NIPSCO for  
10 the first time in this Cause.

11 2. Affirm that Joint Exhibit C and Joint Exhibit E (from Cause No. 43969)  
12 are the only customer class revenue allocators allowable for NIPSCO  
13 TDSIC petitions until new allocators are appropriately determined on the  
14 basis of a 12 CP cost-of-service study in NIPSCO's next base rate case.

15 **Q: Does this conclude your testimony?**

16 A: Yes.

**AFFIRMATION**

I affirm, under the penalties for perjury, that the foregoing representations are true.

*Eric M Hand*

Eric M. Hand, Utility Analyst  
Indiana Office of Utility Consumer Counselor

*10/03/13*

Date

Cause No. 44371  
NIPSCO

Allocation of Base Rate Revenue Requirement

	Base Rate Revenue Requirement	% of Total
Rate 611	\$ 377,800,682	27.882%
Rate 612	\$ 5,160,037	0.381%
Rate 613	\$ 1,225,658	0.090%
Rate 617	\$ 79,874	0.006%
Rate 620	\$ 629,024	0.046%
Rate 621	\$ 179,174,263	13.223%
Rate 622	\$ 1,198,071	0.088%
Rate 623	\$ 156,979,496	11.585%
Rate 624	\$ 192,453,641	14.203%
Rate 625	\$ 3,187,081	0.235%
Rate 626	\$ 59,229,608	4.371%
Rate 632	\$ 140,914,919	10.400%
Rate 633	\$ 121,519,285	8.968%
Rate 634	\$ 94,742,567	6.992%
Rate 641	\$ 2,356,647	0.174%
Rate 642	\$ 83,773	0.006%
Rate 644	\$ 1,862,949	0.137%
Rate 650 - Street Lighting	\$ 8,864,654	0.654%
Rate 655 - Traffic Lighting	\$ 917,431	0.068%
Rate 660 - Dusk-to-Dawn	\$ 2,221,152	0.164%
Interdepartmental	\$ 4,399,188	0.325%
Total	\$ 1,355,000,000	100.000%

Demand Allocators

Table 1

	Demand Allocators - Production Rate Base	% of Total
Rate 611	\$ 874,364,266	27.03%
Rate 612	\$ 11,568,405	0.36%
Rate 613	\$ 2,491,423	0.08%
Rate 617	\$ 567,352	0.02%
Rate 620	\$ 2,460,930	0.08%
Rate 621	\$ 321,313,655	9.93%
Rate 622	\$ 3,167,198	0.10%
Rate 623	\$ 352,718,755	10.90%
Rate 624	\$ 381,527,692	11.80%
Rate 625	\$ 10,357,175	0.32%
Rate 626	\$ 149,042,043	4.61%
Rate 632	\$ 486,895,971	15.05%
Rate 633	\$ 359,680,007	11.12%
Rate 634	\$ 258,398,965	7.99%
Rate 641	\$ 4,083,935	0.13%
Rate 642	\$ 40,353	0.00%
Rate 644	\$ 3,382,779	0.10%
Rate 650 - Street Lighting	\$ 3,183,659	0.10%
Rate 655 - Traffic Lighting	\$ 1,792,941	0.06%
Rate 660 - Dusk-to-Dawn	\$ 873,080	0.03%
Interdepartmental	\$ 6,685,997	0.21%
Total	\$ 3,234,596,580	100.0%