Rocky Mountain Power
Docket No. 25-035-06
Witness: Kenneth Lee Elder, Jr.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Rebuttal Testimony of Kenneth Lee Elder, Jr.

November 2025

Q. Please state your name, business address, and present position with PacifiCorp d/b/a Rocky Mountain Power ("PacifiCorp" or "Company").

A. My name is Kenneth Lee Elder, Jr. My business address is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232. My present position is Director, Pricing and Tariff Policy.

I. QUALIFICATIONS

Q. Please describe your education and professional background.

A. I have a Bachelor's degree in Agriculture Business from Tarleton State University and a Master's degree in Agricultural and Resource Economics from Colorado State University. I have been employed by PacifiCorp since July 2016, where I have managed load forecasting and load research. From 2008 through 2016, I was an economist for a natural resource consulting firm. From 2004 through 2008, I was an economist for the University of Alaska Fairbanks. In May 2025, I assumed my current position.

Q. What are your responsibilities?

A. I am responsible for regulated retail rates and cost of service analysis in the Company's six-state service territory.

Q. Have you testified in previous regulatory proceedings?

A. Yes. I have previously filed testimony on behalf of the Company in regulatory proceedings in Oregon, Utah, Washington, and Wyoming.

Q. Are you adopting the direct testimony of Company witness Robert M. Meredith?

A. Yes. I am adopting the direct testimony of Company witness Robert M. Meredith, which provides the proposed initial rates for Schedule No. 100 – Community Clean Energy Program – Optional.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. My testimony responds to issues raised in the direct testimonies provided by the Community Renewable Energy Agency ("Agency"), Division of Public Utilities ("DPU"), and the Office of Consumer Services ("OCS"), regarding the proposed rates for the Utah Community Clean Energy Program ("CCEP" or "Program").

III. SUMMARY OF ISSUES AND RESPONSE

Q. Please summarize your testimony.

A. The Company has updated its rates for Schedule No. 100 based on the updates proposed in the rebuttal testimony of Company witness Craig M. Eller. I also respond to issues raised by parties related to the initially proposed rates for Schedule No. 100 that can be characterized as follows:

- Energy charges;
- Program enrollment;
- Low-income surcharge and credit;
- Level of detail available for Schedule No. 100 tariff; and
- Levelized costs for Schedule No. 100 rates.

Each of these issues are addressed in my testimony below.

IV. PRICE CHANGE UPDATES AND REBUTTAL EXHIBITS

Q. Does the Company have any updates to the Schedule No. 100 rates that were initially provided in its direct filing?

A. Yes. My testimony incorporates updates proposed in the rebuttal testimony of Company witness Mr. Eller. As noted in his rebuttal testimony, the Company is willing to consider

a time period of three (3) years for the administrative fund balance, provided certain conditions are met, rather than a period of five (5) years, as proposed in the Company's initial filing.[1] My testimony also incorporates the updated cost of retirement of Program resource RECs, as explained in Mr. Eller's rebuttal testimony.

Q. Have you prepared exhibits showing the Company's revised Schedule No. 100 rates based on the revisions proposed by Mr. Eller in this rebuttal filing?

A. Yes. Exhibit RMP___(KLE-1) shows the updated estimated bill impacts for different rate schedules at different usage levels. Exhibit RMP___(KLE-2) shows how the Company estimates the prices, percentage of incremental renewables that participants could claim, and the overall reserve balance for administration and for the PPAs over the life of the Program. Exhibit RMP___(KLE-3) provides example calculations for three years of annual updates.

Q. Can you summarize the issues raised by Agency witness Christopher Thomas?

A. Yes. Mr. Thomas proposes a fixed monthly Program charge for residential customers to simplify billing and improve budget predictability.[2]

Q. How do you respond to Mr. Thomas' proposal of applying a fixed Program charge for residential customers?

A. I disagree with Mr. Thomas' proposal. Rather than using a fixed monthly Program charge, I recommend using an energy charge for the Program as it sends a price signal to customers about the cost of their consumption. Motivated by bill savings, customers may modify their behavior, adopt conservation measures, and choose to live in more

[1] Direct Testimony of Craig M. Eller for Rocky Mountain Power ("Eller Direct"), lines 151-154.
[2] Direct Testimony of Christopher Thomas on behalf of the Community Renewable Energy Agency ("Thomas Direct"), lines 532-541.

efficient homes. Along with demand-side management incentives and rebates, the price of energy that all customers face is an important tool for managing overall customer usage. Furthermore, there is already a fixed charge component to the Program to support the low-income provision. The inclusion of a separate fixed charge could result in confusion for customers.

Alternatively, I agree with DPU witness Mr. Lenell and OCS witness Mr. Sandonato. Both Mr. Lenell and Mr. Sandonato disagree with Mr. Thomas' proposal. Mr. Lenell supports the Company's proposal for fixed charge to cover low-income participation and all other costs recovered via the $/kWh energy charge, as that matches cost recovery with cost incurrence and recognizes the driver of the Program cost a renewable project production."[3] Mr. Sandonato "strongly supports charging customers based on a per kWh rate" as it "better reflects the fundamental rate design principle of cost causation and will better ensure that all Participants are not over-charged for the Program, relative to their actual participation level."[4]

Q. Can you summarize the issue raised by DPU witness Mr. Lenell, regarding opportunistic Program re-entry?

A. Yes. Mr. Lenell stated that the negative rate during the Program's draw-down phase creates a perverse incentive for opportunistic customer re-entry, potentially undermining revenue planning and disadvantaging long-standing participants—highlighting the need for re-enrollment restrictions.[5]

[3] Direct Testimony of Timothy M. Lenell for the DPU ("Lenell Direct"), lines 799-803.
[4] Direct Testimony of Anthony Sandonato for the OCS ("Sandonato Direct"), lines 339-340.
[5] Lenell Direct, lines 662-672.

Q. How do you respond to Mr. Lenell's recommendation of restricting re-enrollment during the wind-down phase?

A. As stated in the Application, an eligible customer may opt into the Program at any time and will be subject to all Program requirements, including exit notices and termination fees.[6] I agree that the projected negative rate during the draw-down phase, beginning in 2043, introduces a potential incentive misalignment, particularly for participants who had opted-out of the Program and who had not contributed meaningfully to the Program during the accumulation phase. Utah Code Ann. § 54-17-905(2)(b)(i) addresses customer re-enrollment after implementation of the Program. It allows a customer that previously elected not to participate in the Program may re-enroll as allowed by Commission rules and by giving notice to the qualified utility. To address this potential incentive misalignment, I support a Commission rule limiting re-enrollment during the draw-down period, where any customer who had opted-out of Program participation during the build-up and maintenance period would not be eligible for Program participation during the draw-down period.

Q. Did Mr. Lenell have concerns regarding the Program's low-income surcharge and subsidy?

A. Yes. Mr. Lenell requested that the Company explicitly acknowledge that if the $0.70 surcharge limit is reached that the Program credits will be reduced commensurately to ensure the assistance Program is fully funded.[7]

[6] *In the Matter of the Application of Rocky Mountain Power to Implement Community Clean Energy Program Authorized by the Community Clean Energy Act,* Docket No. 25-035-06, Application to Implement Community Clean Energy Program Authorized by the Community Clean Energy Act, Attachment C, at pgs. 7-8 of 10 (Jan. 24, 2025).
[7] Lenell Direct, lines 825-828.

Q. How does the Company plan to respond in the event the low-income subsidy reaches the $0.70 per customer per month low-income surcharge?

A. The Company intends to enforce the $0.70 surcharge limit. This surcharge limit was adopted by the Community Renewable Energy Agency Board in its Resolution 22-11.[8] As noted in the Company's Schedule No. 100, low-income assistance credits are subject to the availability of Program funds. If the $0.70 surcharge limit was reached, the Company anticipates it would lower credits so that Program funding and distributions are balanced. However, if at some future date, modifications to the surcharge limit are ultimately found to be necessary, the Company will file a rate adjustment request with the Public Service Commission of Utah ("UPSC") for approval.

Q. Did Mr. Lenell have any other concerns regarding the Company's workpapers in its initial filing?

A. Yes. Mr. Lenell identified that workpapers initially provided in this filing by the Company (RMP Meredith Workpapers - Ann Sch 100 Model 6-4-25), had a projected -$0.02 per month rate during the wind-down period, which implies that the low-income participants will be charged instead of subsidized during the wind-down period.[9]

Q. How do you respond?

A. Workpaper RMP Meredith Workpapers - Ann Sch 100 Model 6-4-25 inadvertently provided a low-income surcharge calculation that was near zero – or more specifically, -$0.02 per customer per month starting in 2043. As noted by Mr. Lenell, the surcharge

[8] Agency Exhibit 1.1 – Community Renewable Energy Agency Board Resolution 22-11.
[9] Lenell Direct, lines 846-853.

should have been zero.[10] The Company does not intend the low-income surcharge to become a credit to all customers. Please refer to revised Workpaper RMP Elder Workpapers – Annual Sch. 100 Forecast Model 11-6-25, which corrects this oversight and ensures the surcharge is zero in the draw-down period.

Q. Can you summarize the issues raised by OCS witness Mr. Sandonato?

A. Yes. Mr. Sandonato recommends the Company provide additional breakdown of the Administrative Reserve fund and Resource Reserve fund components on the Schedule No. 100 tariff, on bills, and in the proposed Notice so that customers fully understand the costs associated with the Program.

Q. How do you respond to OCS witness Mr. Sandonato?

A. The Company is willing to incorporate separate line items for both the Administrative Reserve fund and the Resource Reserve fund in the Schedule No. 100 tariff, within customer bills and in the proposed Notice.

Q. Can you summarize the issues raised by Agency witness Kevin C. Higgins that you wish to address?

A. Yes. Mr. Higgins discusses using levelized net costs in determining Schedule No. 100 charges, rather than using annual net costs.[11]

Q. How do you respond?

A. The Company's approach is designed to align costs with benefits over time, ensuring that participants pay for the actual incremental costs incurred during each phase of the Utah Community Clean Energy Program. As outlined in Company witness

[10] *Id.* at lines 854-855.
[11] Direct Testimony of Kevin C. Higgins on behalf of the Community Renewable Energy Agency ("Higgins Direct"), lines 186-207.

Mr. Meredith's direct testimony, the Program is structured into three distinct phases—build-up, maintenance, and draw-down—each with different cost recovery needs.[12] The Company's forecasted model reflects this structure by adjusting rates to match the timing of costs and reserve requirements, rather than artificially smoothing charges across the entire 24-year period. Levelized costs would misalign cost recovery with actual expenditures, potentially resulting in underfunding of reserves in early years and overcollection in later years.

Furthermore, the Company has committed to annual updates to Schedule No. 100 rates based on actual and forecasted data, including participation levels, renewable generation, administrative costs, and interest earnings. These annual updates ensure that rates remain fair and reflective of current conditions, and that any over- or under-collection is addressed in a timely and transparent manner.

Q. Does this conclude your rebuttal testimony?

A. Yes.

[12] Direct Testimony of Robert M. Meredith for Rocky Mountain Power, lines 73-79.

Rocky Mountain Power
Exhibit RMP___(KLE-1)
Docket No. 25-035-06
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Exhibit Accompanying Rebuttal Testimony of Kenneth Lee Elder, Jr.

Projected Program Impact for Each Customer Class by Tarriff Schedule

November 2025

Utah Community Clean Energy Program Rates

Application Part II.E. Projected Program Impacts for Each Customer Class by Tariff Schedule

Residential						
Schedule		kWh	Monthly Bill Amount	Monthly Bill Amount w/URC	Difference	% Impact
Sch. 1		500	$ 59.63	$ 62.48	$ 2.84	4.8%
		675	$ 86.72	$ 90.56	$ 3.84	4.4%
		900	$ 108.13	$ 113.25	$ 5.12	4.7%

Non Residential						
Schedule	kW	kWh	Monthly Bill Amount	Monthly Bill Amount w/URC	Difference	% Impact
Sch. 6	50	13,140	$ 1,686.92	$ 1,761.60	$ 74.68	4.4%
	300	91,250	$ 10,410.76	$ 10,929.38	$ 518.62	5.0%
	1,000	356,000	$ 37,004.18	$ 39,027.49	$ 2,023.31	5.5%
Sch. 8	1,000	452,600	$ 42,750.96	$ 45,323.29	$ 2,572.33	6.0%
	1,500	860,000	$ 56,940.21	$ 61,827.99	$ 4,887.78	8.6%
	5,825	3,394,500	$ 276,328.26	$ 295,620.77	$ 19,292.51	7.0%
Sch. 9	1,000	452,600	$ 37,027.38	$ 39,599.71	$ 2,572.33	6.9%
	5,500	2,489,300	$ 202,228.56	$ 216,376.40	$ 14,147.84	7.0%
	40,825	18,104,000	$ 1,486,236.96	$ 1,589,130.35	$ 102,893.39	6.9%
Sch. 23	5	1,752	$ 209.00	$ 218.96	$ 9.96	4.8%
	15	4,380	$ 388.00	$ 412.89	$ 24.89	6.4%
	30	10,220	$ 969.00	$ 1,027.08	$ 58.08	6.0%

Rocky Mountain Power
Exhibit RMP___(KLE-2)
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Exhibit Accompanying Rebuttal Testimony of Kenneth Lee Elder, Jr.

Summary of Utah Community Clean Energy Program Forecast

November 2025

Summary of Utah Community Clean Energy Program Forecast

Phase	Year	Rate ($/kWh)	Price Premium	Incremental % Renewable	End of Year Reserve Balance
Build Up	2026	0.005683	2.6%	0.0%	$6,537,867
	2027	0.005683	5.0%	0.0%	$20,380,011
	2028	0.003286	2.9%	0.4%	$30,265,269
	2029	0.003286	2.9%	4.9%	$40,760,021
Maintenance	2030	0.000614	0.5%	5.1%	$40,779,084
	2031	0.000614	0.5%	9.4%	$40,773,751
	2032	0.000614	0.5%	9.4%	$40,779,879
	2033	0.000614	0.5%	9.4%	$40,781,660
	2034	0.000614	0.5%	9.3%	$40,779,707
	2035	0.000614	0.5%	9.3%	$40,777,654
	2036	0.000614	0.5%	9.3%	$40,775,496
	2037	0.000614	0.5%	9.2%	$40,773,228
	2038	0.000614	0.5%	9.2%	$40,770,843
	2039	0.000614	0.5%	9.2%	$40,768,337
	2040	0.000614	0.5%	9.2%	$40,765,702
	2041	0.000614	0.5%	9.2%	$40,762,933
	2042	0.000614	0.5%	9.1%	$40,760,021
Draw Down	2043	-0.000895	-0.8%	9.1%	$35,771,552
	2044	-0.000895	-0.8%	9.1%	$30,527,863
	2045	-0.000895	-0.8%	9.1%	$25,015,897
	2046	-0.000895	-0.8%	9.0%	$19,221,928
	2047	-0.000895	-0.8%	9.0%	$13,131,529
	2048	-0.000895	-0.8%	9.0%	$6,729,534
	2049	-0.000895	-0.8%	9.0%	($0)

Rocky Mountain Power
Exhibit RMP___(KLE-3)
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Exhibit Accompanying Rebuttal Testimony of Kenneth Lee Elder, Jr.

Example Calculation of Schedule 100 Annual Price Update

November 2025

	Actual	Target	Target
	6/1/2026	10/1/2027	10/1/2028
REC Reserve ($)	-	18,681,676	28,871,682
Admin Reserve ($)	(1,572,588)	2,508,065	3,274,018

	Current Rates	New Rates	Variance
REC Reserve ($/kWh)	0.0043943	0.0031068	-
CREA ($/kWh)	0.0012891	0.0013092	-
Total	0.0056835	0.0044160	

Low-Income Surcharge ($/Mo)	0.10	0.04	0

REC 1 Premium ($/MWh)	10
REC 2 Premium ($/MWh)	10
Interest	5%

	Actual										Forecast					
Month	7/1/2026	8/1/2026	9/1/2026	10/1/2026	11/1/2026	12/1/2026	1/1/2027	2/1/2027	3/1/2027	4/1/2027	5/1/2027	6/1/2027	7/1/2027	8/1/2027	9/1/2027	10/1/2027
Participating Energy	270,498,248	277,688,716	259,017,883	206,963,523	210,209,168	235,418,908	252,319,165	250,204,881	238,771,898	234,015,241	220,616,546	228,563,428	292,091,052	299,855,507	279,694,256	223,484,601
Project Reserve Rate	0.004394	0.004394	0.004394	0.004394	0.004394	0.004394	0.004394	0.004394	0.004394	0.004394	0.004394	0.004394	0.004394	0.004394	0.004394	0.004394
CREA Rate	0.001289	0.001289	0.001289	0.001289	0.001289	0.001289	0.001289	0.001289	0.001289	0.001289	0.001289	0.001289	0.001289	0.001289	0.001289	0.001289
Project Reserve Collection	1,188,660	1,220,257	1,138,211	909,467	923,729	1,034,510	1,108,775	1,099,484	1,049,244	1,028,341	969,463	1,004,384	1,283,546	1,317,666	1,229,070	982,066
Renewable Project Reserve	1,188,660	2,411,337	3,557,288	4,479,795	5,420,425	6,475,558	7,609,241	8,738,415	9,822,159	10,889,600	11,906,457	12,962,543	14,302,774	15,682,780	16,979,755	18,034,616
Administrative Cost	251,184	251,184	251,184	251,184	251,184	251,184	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603
Total Renewables																
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Project 1																
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Project 2																
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
CREA Collection	348,707	357,976	333,907	266,802	270,986	303,485	325,271	322,546	307,807	301,675	284,403	294,647	376,542	386,552	360,561	288,100
Administrative Reserve	(1,475,066)	(1,368,275)	(1,285,553)	(1,269,935)	(1,250,133)	(1,197,833)	(964,706)	(732,415)	(513,033)	(298,014)	(107,214)	93,998	378,114	673,443	943,959	1,142,990
Interest Rate											5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Reserve Fund Interest	-	2,420	7,740	13,040	16,900	20,624	24,908	29,690	34,500	39,100	47,393	51,703	56,685	62,340	67,905	72,795
Admin Interest	-	-	-	-	-	-	1,458	3,348	5,178	6,947	-	167	1,176	2,381	3,557	4,533
Total CREA Rate	0.005683	0.005683	0.005683	0.005683	0.005683	0.005683	0.005683	0.005683	0.005683	0.005683	0.005683	0.005683	0.005683	0.005683	0.005683	0.005683
Participating Customers	203,403	203,403	203,403	203,403	203,403	203,403	203,403	203,403	203,403	203,403	205,500	205,500	205,500	205,500	205,500	205,500
Participating Sch. 3 Customers	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754
Participating Sch. 3 Energy	1,848,264	2,147,426	1,795,888	1,266,594	1,389,976	1,645,541	1,718,035	1,674,670	1,575,660	1,438,883	1,266,121	1,428,838	1,975,845	2,295,658	1,919,854	1,354,024
Low Income Surcharge ($/mo)	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
Low Income Surcharge ($)	20,611	20,611	20,611	20,611	20,611	20,611	20,611	20,611	20,611	20,611	20,829	20,829	20,829	20,829	20,829	20,829
Low Income ($)	10,505	12,205	10,207	7,199	7,900	9,352	9,764	9,518	8,955	8,178	7,196	8,121	11,230	13,047	10,911	7,696
Difference	10,106	18,512	28,916	42,328	55,039	66,297	77,144	88,237	99,892	112,325	125,959	138,667	148,267	156,049	165,967	179,101

	Forecast											
Month	11/1/2027	12/1/2027	1/1/2028	2/1/2028	3/1/2028	4/1/2028	5/1/2028	6/1/2028	7/1/2028	8/1/2028	9/1/2028	10/1/2028
Participating Energy	226,989,334	254,211,468	286,804,479	284,401,228	271,405,661	265,998,896	248,261,267	257,203,946	328,692,003	337,429,396	314,741,806	251,488,708
Project Reserve Rate	0.003107	0.003107	0.003107	0.003107	0.003107	0.003107	0.003107	0.003107	0.003107	0.003107	0.003107	0.003107
CREA Rate	0.001309	0.001309	0.001309	0.001309	0.001309	0.001309	0.001309	0.001309	0.001309	0.001309	0.001309	0.001309
Project Reserve Collection	705,210	789,784	891,044	883,578	843,203	826,405	771,298	799,081	1,021,180	1,048,326	977,840	781,325
Renewable Project Reserve	18,169,380	19,036,515	20,008,735	20,977,523	21,909,889	22,829,307	23,697,334	24,596,819	25,722,613	26,880,300	27,972,178	28,871,682
Administrative Cost	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603
Total Renewables												
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-
Project 1												
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-
Project 2												
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-
CREA Collection	297,176	332,816	375,487	372,341	355,327	348,248	325,026	336,734	430,326	441,765	412,063	329,251
Administrative Reserve	165,971	406,569	690,930	973,322	1,239,842	1,500,379	1,738,730	1,989,808	2,335,719	2,694,534	3,025,080	3,274,018
Interest Rate	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Reserve Fund Interest	76,613	77,351	81,175	85,211	89,163	93,013	96,729	100,404	104,614	109,362	114,038	118,179
Admin Interest	5,382	1,385	2,476	3,655	4,796	5,892	6,929	7,946	9,187	10,653	12,086	13,290
Total CREA Rate	0.004416	0.004416	0.004416	0.004416	0.004416	0.004416	0.004416	0.004416	0.004416	0.004416	0.004416	0.004416
Participating Customers	205,500	205,500	205,500	205,500	205,500	205,500	205,500	205,500	205,500	205,500	205,500	205,500
Participating Sch. 3 Customers	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754
Participating Sch. 3 Energy	1,485,923	1,759,130	1,933,316	1,884,518	1,773,101	1,619,185	1,424,774	1,607,881	2,223,432	2,583,319	2,160,425	1,523,693
Low Income Surcharge ($/mo)	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04
Low Income Surcharge ($)	8,088	8,088	8,088	8,088	8,088	8,088	8,088	8,088	8,088	8,088	8,088	8,088
Low Income ($)	6,562	7,768	8,538	8,322	7,830	7,150	6,292	7,100	9,819	11,408	9,540	6,729
Difference	1,526	1,846	1,397	1,163	1,421	2,359	4,155	5,143	3,413	93	(1,360)	0

	Actual	Target	Target
	10/1/2027	10/1/2028	10/1/2029
REC Reserve ($)	18,681,676	28,871,682	40,760,021
Admin Reserve ($)	2,508,065	3,274,018	3,928,822

	Current Rates	New Rates	Variance from Target
REC Reserve ($/kWh)	0.0031068	0.0022791	-
CREA ($/kWh)	0.0013092	(0.0006824)	-
Total	0.0044160	0.0015967	

Low-Income Surcharge ($/Mo)	0.04	0.02	-

REC 1 Premium ($/MWh)	10
REC 2 Premium ($/MWh)	10
Interest	5%

	Actual						Forecast					
Month	11/1/2027	12/1/2027	1/1/2028	2/1/2028	3/1/2028	4/1/2028	5/1/2028	6/1/2028	7/1/2028	8/1/2028	9/1/2028	10/1/2028
Participating Energy	222,449,547	249,127,238	281,068,390	278,713,204	265,977,548	260,678,918	248,261,267	257,203,946	328,692,003	337,429,396	314,741,806	251,488,708
Project Reserve Rate	0.0031068	0.0031068	0.0031068	0.0031068	0.0031068	0.0031068	0.0031068	0.0031068	0.0031068	0.0031068	0.0031068	0.0031068
CREA Rate	0.001309209	0.001309209	0.001309209	0.001309209	0.001309209	0.001309209	0.001309209	0.001309209	0.001309209	0.001309209	0.001309209	0.001309209
Project Reserve Collection	691,106	773,988	873,223	865,906	826,339	809,877	771,298	799,081	1,021,180	1,048,326	977,840	781,325
Renewable Project Reserve	19,372,783	20,224,271	21,181,494	22,134,300	23,050,939	23,954,316	24,827,031	25,731,223	26,861,744	28,024,177	29,120,822	30,025,111
Administrative Cost	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603
Total Renewables												
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-
Project 1												
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-
Project 2												
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-
CREA Collection	291,233	326,160	367,977	364,894	348,220	341,283	325,026	336,734	430,326	441,765	412,063	329,251
Administrative Reserve	2,705,695	2,960,583	3,258,639	3,553,778	3,832,524	4,104,587	4,353,790	4,615,763	4,972,615	5,342,418	5,683,996	5,944,014
Interest Rate							5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Reserve Fund Interest	73,000	77,500	84,000	86,900	90,300	93,500	101,417	105,111	109,341	114,108	118,805	122,965
Admin Interest	20,400	22,331	23,681	23,848	24,129	24,383	17,780	18,842	20,129	21,640	23,119	24,369
Total CREA Rate	0.004416008	0.004416008	0.004416008	0.004416008	0.004416008	0.004416008	0.004416008	0.004416008	0.004416008	0.004416008	0.004416008	0.004416008
Participating Customers	201,349	201,349	201,349	201,349	201,349	201,349	205,458	205,458	205,458	205,458	205,458	205,458
Participating Sch. 3 Customers	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754
Participating Sch. 3 Energy	1,485,923	1,759,130	1,933,316	1,884,518	1,773,101	1,619,185	1,441,491	1,626,746	2,249,518	2,613,628	2,185,772	1,541,570
Low Income Surcharge ($/mo)	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04
Low Income Surcharge ($)	7,920	7,920	7,920	7,920	7,920	7,920	8,086	8,086	8,086	8,086	8,086	8,086
Low Income Impact ($)	6,562	7,768	8,538	8,322	7,830	7,150	6,366	7,184	9,934	11,542	9,652	6,808
Difference	1,358	1,510	893	491	581	1,350	3,071	3,974	2,127	(1,329)	(2,895)	(1,616)

	Forecast											
Month	11/1/2028	12/1/2028	1/1/2029	2/1/2029	3/1/2029	4/1/2029	5/1/2029	6/1/2029	7/1/2029	8/1/2029	9/1/2029	10/1/2029
Participating Energy	255,432,607	286,065,855	290,169,441	287,737,993	274,589,954	269,119,754	251,174,016	260,221,616	332,548,414	341,388,319	318,434,545	254,439,324
Project Reserve Rate	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072
CREA Rate	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384
Project Reserve Collection	582,149	651,965	661,317	655,776	625,810	613,343	572,444	593,064	757,902	778,049	725,735	579,886
Renewable Project Reserve	31,887,007	32,673,193	33,472,026	34,268,634	35,038,534	35,799,149	36,521,949	37,268,423	38,183,189	39,121,955	40,012,210	40,760,021
Administrative Cost	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603
Total Renewables												
REC Generation	-	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982
REC Premium	-	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824
Project 1												
REC Generation	-	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982
REC Premium	-	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824
Project 2												
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-
CREA Collection	(174,303)	(195,207)	(198,007)	(196,348)	(187,376)	(183,643)	(171,397)	(177,571)	(226,926)	(232,958)	(217,295)	(173,625)
Administrative Reserve	8,368,891	7,974,722	7,576,104	7,177,488	6,786,201	6,397,025	6,018,499	5,632,208	5,194,851	4,749,627	4,318,243	3,928,822
Interest Rate	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Reserve Fund Interest	126,317	134,221	137,516	140,833	144,090	147,272	150,356	153,410	156,864	160,718	164,520	167,926
Admin Interest	24,404	34,464	32,815	31,158	29,516	27,893	26,297	24,707	22,995	21,160	19,337	17,631
Total CREA Rate	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688
Participating Customers	205,458	205,458	205,458	205,458	205,458	205,458	205,458	205,458	205,458	205,458	205,458	205,458
Participating Sch. 3 Customers	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754
Participating Sch. 3 Energy	1,691,738	2,002,786	2,008,603	1,957,904	1,842,149	1,682,239	1,480,258	1,670,495	2,310,016	2,683,918	2,244,556	1,583,028
Low Income Surcharge ($/mo)	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02
Low Income Surcharge ($)	3,081	3,081	3,081	3,081	3,081	3,081	3,081	3,081	3,081	3,081	3,081	3,081
Low Income Impact ($)	2,701	3,198	3,207	3,126	2,941	2,686	2,364	2,667	3,688	4,285	3,584	2,528
Difference	380	264	138	93	233	628	1,346	1,760	1,153	(51)	(554)	-

	Actual	Target	Target
	10/1/2028	10/1/2029	10/1/2030
REC Reserve ($)	28,871,682	40,760,021	40,760,021
Admin Reserve ($)	3,274,018	3,928,822	3,928,822

	Current Rates	New Rates	Variance from Target
REC Reserve ($/kWh)	0.0022791	0.0010280	-
CREA ($/kWh)	(0.0006824)	0.0038726	-
Total	0.0015967	0.0049005	

Low-Income Surcharge ($/Mo)	0.02	0.05	0

REC 1 Premium ($/MWh)	10
REC 2 Premium ($/MWh)	10
Interest	5%

	Actual						Forecast					
Month	11/1/2028	12/1/2028	1/1/2029	2/1/2029	3/1/2029	4/1/2029	5/1/2029	6/1/2029	7/1/2029	8/1/2029	9/1/2029	10/1/2029
Participating Energy	242,660,976	271,762,562	275,660,969	273,351,093	260,860,457	255,663,766	251,174,016	260,221,616	332,548,414	341,388,319	318,434,545	254,439,324
Project Reserve Rate	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072
CREA Rate	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384
Project Reserve Collection	553,042	619,366	628,251	622,987	594,520	582,676	572,444	593,064	757,902	778,049	725,735	579,886
Renewable Project Reserve	29,424,724	30,165,190	30,917,441	31,668,428	32,394,848	33,112,924	33,824,531	34,559,766	35,463,245	36,390,678	37,269,553	38,005,937
Administrative Cost	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603
Total Renewables												
REC Generation	-	9,705	11,523	11,229	15,480	17,191	13,982	13,982	13,982	13,982	13,982	13,982
REC Premium	-	97,048	115,228	112,287	154,795	171,906	139,824	139,824	139,824	139,824	139,824	139,824
Project 1												
REC Generation	-	9,705	11,523	11,229	15,480	17,191	13,982	13,982	13,982	13,982	13,982	13,982
REC Premium	-	97,048	115,228	112,287	154,795	171,906	139,824	139,824	139,824	139,824	139,824	139,824
Project 2												
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-
CREA Collection	(165,588)	(185,446)	(188,107)	(186,530)	(178,007)	(174,461)	(171,397)	(177,571)	(226,926)	(232,958)	(217,295)	(173,625)
Administrative Reserve	3,014,828	2,665,386	2,294,719	1,928,399	1,527,872	1,113,491	712,950	304,553	(155,003)	(621,388)	(1,072,109)	(1,479,160)
Interest Rate							5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Reserve Fund Interest	118,000	121,100	124,000	128,000	131,900	135,400	139,163	142,171	145,578	149,384	153,140	156,498
Admin Interest	26,641	26,655	26,270	26,100	25,878	25,588	4,282	2,601	796	-	-	-
Total CREA Rate	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688
Participating Customers	195,185	195,185	195,185	195,185	195,185	195,185	205,000	205,000	205,000	205,000	205,000	205,000
Participating Sch. 3 Customers	5,696	5,696	5,696	5,696	5,696	5,696	5,752	5,752	5,754	5,754	5,754	5,754
Participating Sch. 3 Energy	1,655,398	1,959,765	1,936,439	1,887,562	1,775,965	1,621,800	1,441,491	1,626,746	2,249,518	2,613,628	2,185,772	1,541,570
Low Income Surcharge ($/mo)	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02
Low Income Surcharge ($)	2,924	2,924	2,924	2,924	2,924	2,924	3,074	3,074	3,074	3,074	3,074	3,074
Low Income Impact ($)	2,643	3,129	3,092	3,014	2,836	2,590	2,302	2,597	3,592	4,173	3,490	2,461
Difference	281	75	(93)	(183)	(95)	239	1,012	1,488	971	(128)	(544)	69

	Forecast											
Month	11/1/2029	12/1/2029	1/1/2030	2/1/2030	3/1/2030	4/1/2030	5/1/2030	6/1/2030	7/1/2030	8/1/2030	9/1/2030	10/1/2030
Participating Energy	258,429,494	289,422,150	297,973,187	295,476,349	281,974,710	276,357,395	257,929,029	267,219,953	341,491,890	350,569,533	326,998,446	261,282,153
Project Reserve Rate	0.001027975	0.001027975	0.001027975	0.001027975	0.001027975	0.001027975	0.001027975	0.001027975	0.001027975	0.001027975	0.001027975	0.001027975
CREA Rate	0.003872557	0.003872557	0.003872557	0.003872557	0.003872557	0.003872557	0.003872557	0.003872557	0.003872557	0.003872557	0.003872557	0.003872557
Project Reserve Collection	265,659	297,519	306,309	303,742	289,863	284,088	265,145	274,695	351,045	360,377	336,146	268,591
Renewable Project Reserve	35,676,423	36,123,213	36,580,674	37,037,468	37,482,258	37,923,114	38,346,824	38,781,870	39,295,237	39,820,095	40,322,859	40,760,021
Administrative Cost	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603
Total Renewables												
REC Generation	13,982	13,912	13,912	13,912	13,912	13,912	13,912	13,912	13,912	13,912	13,912	13,912
REC Premium	139,824	139,125	139,125	139,125	139,125	139,125	139,125	139,125	139,125	139,125	139,125	139,125
Project 1												
REC Generation	13,982	13,912	13,912	13,912	13,912	13,912	13,912	13,912	13,912	13,912	13,912	13,912
REC Premium	139,824	139,125	139,125	139,125	139,125	139,125	139,125	139,125	139,125	139,125	139,125	139,125
Project 2												
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-
CREA Collection	1,000,783	1,120,804	1,153,918	1,144,249	1,091,963	1,070,210	998,845	1,034,824	1,322,447	1,357,600	1,266,320	1,011,830
Administrative Reserve	(6,119,717)	(5,231,641)	(4,310,450)	(3,398,928)	(2,539,693)	(1,702,210)	(936,093)	(133,996)	957,920	2,089,613	3,134,551	3,928,822
Interest Rate	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Reserve Fund Interest	158,912	149,272	151,152	153,052	154,927	156,768	158,565	160,351	162,322	164,481	166,617	168,571
Admin Interest	-	-	-	-	-	-	-	-	2,197	6,820	11,345	15,169
Total CREA Rate	0.004900532	0.004900532	0.004900532	0.004900532	0.004900532	0.004900532	0.004900532	0.004900532	0.004900532	0.004900532	0.004900532	0.004900532
Participating Customers	205,000	205,000	205,000	205,000	205,000	205,000	205,000	205,000	205,000	205,000	205,000	205,000
Participating Sch. 3 Customers	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754
Participating Sch. 3 Energy	1,691,738	2,002,786	2,008,603	1,957,904	1,842,149	1,682,239	1,480,258	1,670,495	2,310,016	2,683,918	2,244,556	1,583,028
Low Income Surcharge ($/mo)	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
Low Income Surcharge ($)	9,457	9,457	9,457	9,457	9,457	9,457	9,457	9,457	9,457	9,457	9,457	9,457
Low Income Impact ($)	8,290	9,815	9,843	9,595	9,028	8,244	7,254	8,186	11,320	13,153	11,000	7,758
Difference	1,167	809	423	285	715	1,928	4,131	5,402	3,539	(157)	(1,699)	0

	Actual	Target	Target
	10/1/2028	10/1/2029	10/1/2030
REC Reserve	28,871,682	40,760,021	40,760,021
Admin Reserve	3,928,822	3,928,822	3,928,822

	Current Rates	New Rates	Variance from Target
REC Reserve	0.0022791	0.0039785	-
CREA	(0.0006824)	0.0055111	-
Total	0.0015967	0.0094896	

Low Income Surcharge	0.02	0.16	-

REC 1 Premium	10
REC 2 Premium	10
Interest	5%

	Actual						Forecast					
Month	11/1/2028	12/1/2028	1/1/2029	2/1/2029	3/1/2029	4/1/2029	5/1/2029	6/1/2029	7/1/2029	8/1/2029	9/1/2029	10/1/2029
Participating Energy	229,889,346	251,737,952	203,118,608	187,029,696	164,753,973	158,780,655	150,000,000	150,000,000	185,000,000	185,000,000	185,000,000	185,000,000
Project Reserve Rate	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072	0.002279072
CREA Rate	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384	-0.000682384
Project Reserve Collection	523,934	573,729	462,922	426,254	375,486	361,873	341,861	341,861	421,628	421,628	421,628	421,628
Renewable Project Reserve	29,395,616	30,090,445	30,677,367	31,231,621	31,739,007	32,236,280	32,713,171	33,192,049	33,752,856	34,315,999	34,881,489	35,449,335
Administrative Cost	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603
Total Renewables												
REC Generation	-	9,705	11,523	11,229	15,480	17,191	13,912	13,912	13,912	13,912	13,912	13,912
REC Premium	-	97,048	115,228	112,287	154,795	171,906	139,125	139,125	139,125	139,125	139,125	139,125
Project 1												
REC Generation	-	9,705	11,523	11,229	15,480	17,191	13,912	13,912	13,912	13,912	13,912	13,912
REC Premium	-	97,048	115,228	112,287	154,795	171,906	139,125	139,125	139,125	139,125	139,125	139,125
Project 2												
REC Generation	-	-	-	-	-	-	-	-	-	-	-	-
REC Premium	-	-	-	-	-	-	-	-	-	-	-	-
CREA Collection	(156,873)	(171,782)	(138,605)	(127,626)	(112,425)	(108,349)	(102,358)	(102,358)	(126,241)	(126,241)	(126,241)	(126,241)
Administrative Reserve	3,678,347	3,342,569	3,021,404	2,713,988	2,379,043	2,030,773	1,703,936	1,375,738	1,022,239	667,267	310,816	(47,121)
Interest Rate							5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Reserve Fund Interest	118,000	121,100	124,000	128,000	131,900	135,400	135,030	137,017	139,179	141,515	143,862	146,218
Admin Interest	26,641	26,655	26,270	26,100	25,878	25,588	8,248	6,886	5,469	3,996	2,517	1,032
Total CREA Rate	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688	0.001596688
Participating Customers	121,000	121,000	121,000	121,000	121,000	121,000	121,000	121,000	121,000	121,000	121,000	121,000
Participating Sch. 3 Customers	5,696	5,696	5,696	5,696	5,696	5,696	5,752	5,752	5,754	5,754	5,754	5,754
Participating Sch. 3 Energy	1,655,398	1,959,765	1,936,439	1,887,562	1,775,965	1,621,800	1,400,000	1,650,000	2,310,016	2,683,918	2,244,556	1,583,028
Low Income Surcharge ($/mo)	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02
Low Income Surcharge ($)	1,779	1,779	1,779	1,779	1,779	1,779	1,778	1,778	1,778	1,778	1,778	1,778
Low Income Impact ($)	2,643	3,129	3,092	3,014	2,836	2,590	2,235	2,635	3,688	4,285	3,584	2,528
Difference	(864)	(2,214)	(3,527)	(4,762)	(5,818)	(6,629)	(7,086)	(7,942)	(9,853)	(12,360)	(14,165)	(14,915)

	Forecast											
Month	11/1/2029	12/1/2029	1/1/2030	2/1/2030	3/1/2030	4/1/2030	5/1/2030	6/1/2030	7/1/2030	8/1/2030	9/1/2030	10/1/2030
Participating Energy	185,000,000	185,000,000	185,000,000	185,000,000	185,000,000	185,000,000	185,000,000	185,000,000	185,000,000	185,000,000	185,000,000	185,000,000
Project Reserve Rate	0.003978463	0.003978463	0.003978463	0.003978463	0.003978463	0.003978463	0.003978463	0.003978463	0.003978463	0.003978463	0.003978463	0.003978463
CREA Rate	0.005511128	0.005511128	0.005511128	0.005511128	0.005511128	0.005511128	0.005511128	0.005511128	0.005511128	0.005511128	0.005511128	0.005511128
Project Reserve Collection	736,016	736,016	736,016	736,016	736,016	736,016	736,016	736,016	736,016	736,016	736,016	736,016
Renewable Project Reserve	31,023,904	31,890,719	32,761,146	33,635,200	34,512,896	35,394,249	36,279,274	37,167,986	38,060,402	38,956,536	39,856,404	40,760,021
Administrative Cost	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603	93,603
Total Renewables												
REC Generation	13,912	27,825	27,825	27,825	27,825	27,825	27,825	27,825	27,825	27,825	27,825	27,825
REC Premium	139,125	278,253	278,253	278,253	278,253	278,253	278,253	278,253	278,253	278,253	278,253	278,253
Project 1												
REC Generation	13,912	13,843	13,843	13,843	13,843	13,843	13,843	13,843	13,843	13,843	13,843	13,843
REC Premium	139,125	138,430	138,430	138,430	138,430	138,430	138,430	138,430	138,430	138,430	138,430	138,430
Project 2												
REC Generation	-	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982	13,982
REC Premium	-	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824	139,824
CREA Collection	1,019,559	1,019,559	1,019,559	1,019,559	1,019,559	1,019,559	1,019,559	1,019,559	1,019,559	1,019,559	1,019,559	1,019,559
Administrative Reserve	(3,249,219)	(2,601,517)	(1,953,814)	(1,306,112)	(658,409)	(10,707)	639,075	1,291,564	1,946,772	2,604,710	3,265,390	3,928,822
Interest Rate	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Reserve Fund Interest	149,239	130,800	134,411	138,038	141,680	145,337	149,009	152,697	156,400	160,118	163,852	167,602
Admin Interest	1,928	-	-	-	-	-	2,079	4,787	7,506	10,236	12,977	15,730
Total CREA Rate	0.009489591	0.009489591	0.009489591	0.009489591	0.009489591	0.009489591	0.009489591	0.009489591	0.009489591	0.009489591	0.009489591	0.009489591
Participating Customers	121,000	121,000	121,000	121,000	121,000	121,000	121,000	121,000	121,000	121,000	121,000	121,000
Participating Sch. 3 Customers	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754	5,754
Participating Sch. 3 Energy	1,737,235	2,056,648	2,033,266	1,981,944	1,864,768	1,702,894	1,498,433	1,691,006	2,338,380	2,716,873	2,272,116	1,602,465
Low Income Surcharge ($/mo)	0.16	0.16	0.16	0.16	0.16	0.16	0.16	0.16	0.16	0.16	0.16	0.16
Low Income Surcharge ($)	18,581	18,581	18,581	18,581	18,581	18,581	18,581	18,581	18,581	18,581	18,581	18,581
Low Income Impact ($)	16,486	19,517	19,295	18,808	17,696	16,160	14,220	16,047	22,190	25,782	21,561	15,207
Difference	2,095	1,159	445	217	1,102	3,523	7,884	10,418	6,808	(393)	(3,374)	-