



October 9, 2020

By Electronic Filing

Brinda Westbrook-Sedgwick
Commission Secretary
D.C. Public Service Commission
1325 G Street, N.W., Suite 800
Washington, D.C. 20005

Re: Formal Case No. 1156

In the Matter of Application of Potomac Electric Power Company
for Authority to Implement a Multiyear Rate Plan for Electric Distribution Service
in the District of Columbia

Dear Ms. Westbrook-Sedgwick:

Enclosed for filing is the Second Supplemental Testimony of Bruce R. Oliver on behalf of the Apartment and Office Building Association of Metropolitan in the above-captioned proceeding.

If you have any questions, please contact me at ffrancis@aoba-metro.org or call my cell at (301) 518-9700. Thank you for your attention in this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Frann G. Francis'.

Frann G. Francis, Esq.

cc: All parties of record

Before the

**PUBLIC SERVICE COMMISSION
OF THE
DISTRICT OF COLUMBIA**

IN THE MATTER OF

The Application of Potomac Electric Power
Company for Authority to Implement A
Multi-Year Rate Plan for Electric Distribution
Service in the District of Columbia

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Formal Case No. 1156

**VOLUME I OF I: SECOND SUPPLEMENTAL TESTIMONY
OF AOBA WITNESS BRUCE R. OLIVER**

October 9, 2020

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ATTACHMENT A: Responses to Data Requests

- 1. AOBA's Response to Staff Data Request 3-3**
- 2. AOBA's Response to Staff Data Request 3-5**
- 3. Pepco's Response to AOBA Data Request 9-2**
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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE RECORD.

A. My name is Bruce R. Oliver. My business address is 7103 Laketree Drive Fairfax Station, Virginia, 22039.

Q. BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?

A. I am employed by Revilo Hill Associates, Inc., and serve as President of the firm. I manage the firm's business and consulting activities, and I direct its preparation and presentation of economic, utility planning, and policy analyses for our clients.

Q. ON WHOSE BEHALF DO YOU APPEAR IN THIS PROCEEDING?

A. I appear on behalf of the Apartment and Office Building Association of Metropolitan Washington (AOBA).

Q. HAVE YOU PREVIOUSLY SUBMITTED DIRECT, REBUTTAL, SURREBUTTAL, AND SUPPLEMENTAL SURREBUTTAL TESTIMONY ON BEHALF OF AOBA IN THIS PROCEEDING?

A. Yes, I have.

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1 **Q. WHAT IS THE PURPOSE OF YOUR SECOND SUPPLEMENTAL SURRE-**
2 **BUTTAL TESTIMONY?**

3 A. This Second Supplemental Surrebuttal Testimony responds to the Errata filed by
4 Pepco on July 28, 2020, the Supplemental Testimony filed by Pepco on July 31,
5 2020, and the Company's Initial and Amended Responses to Staff Data Request
6 No. 24-24 submitted on July 22, 2020, July 24, 2020, and July 28, 2020.

7
8 **Q. WAS THIS TESTIMONY PREPARED BY YOU OR UNDER YOUR DIRECT**
9 **SUPERVISION AND CONTROL?**

10 A. Yes, it was.
11

12 **II. SUMMARY**

13
14 **Q. WOULD YOU PLEASE SUMMARIZE YOUR FINDINGS WITH RESPECT TO**
15 **THE ERRATA AND SUPPLEMENTAL TESTIMONY THAT PEPSCO FILED**
16 **NEAR THE END OF JULY 2020?**

17 A. Yes, I will.

18 First, the asserted premise for Pepco's Errata filing and subsequent July
19 31, 2020 Supplemental Testimony is incorrect and misleading. Witness
20 Blazunas indicates that the Company has made a "*correction*" to an error in the
21 Company's forecasted billing determinants, but in fact, the Company's revisions

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1 to its demand billing determinants represent a change in methodology or
2 assumptions, not the correction of an error.

3 Second, Pepco has falsified its bill impact analyses to provide the
4 appearance that customers will see no changes in their rates in Rate Year 1 and
5 in Rate Year 2. In fact, most non-residential customers (other than Street
6 Lighting, GS-3A, and GT-3B) would see rate increases in both Rate Year 1 and
7 Rate Year 2 under the Company's REVISED MRP Enhanced Proposal. They
8 would also see increases in the charges on their monthly bills in both Rate Year
9 1 (i.e., 2020) and Rate Year 2 (i.e., 2021). To give the appearance of no
10 increases in customer bills for Rate Years 1 and 2, Pepco has assumed that the
11 current and proposed rates for each of those years will be identical. But that is
12 not what Company's rate design exhibits show.

13 Third, although the Company's claimed billing determinants error results in
14 changes in the demand billing units for each projected Rate Year, Pepco has
15 chosen to adjust its proposed rates by increasing its Distribution Charges that are
16 applied on a cents per kWh basis. This shifts costs responsibilities in a **non-**
17 **cost-based** manner from low load factor customers to higher load factor
18 customers within the GT-LV, MGT-LV, and GSD-LV classes.

19 Fourth, the Rider ERR Credits that Pepco proposes under its Revised
20 MRP Enhanced Rate Design produce Rate Year 3 credits for three classes (that
21 are greater than the cumulative increases the Company would apply to those

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1 classes in Rate Year 3. Moreover, for the GT-3B class Pepco inexplicably
2 proposes Rider ERR Credits that significantly exceed the entire annual base rate
3 revenue requirement for that class. In other words, Pepco would pay the
4 Company's one GT-3B customer (WASA) for taking service in Rate Year 3.

5 The multiple changes Pepco has made to its forecasted billing
6 determinants in this proceeding **underscore** the unreliability of the Company's
7 billing determinants forecasts. A monopoly provider of a utility service should
8 never be free to manipulate its rates through unilateral adjustment of the billing
9 determinants to which a set of rates is applied. Yet, that is exactly what Pepco
10 seeks authorization to do in this proceeding.

11 Pepco has asked that the Company be granted authority to make annual
12 adjustments to its forecasted billing determinants. Pepco also indicates that it
13 intends to use such revised billing determinant forecasts **to annually adjust its**
14 **base rate charges** by rate class outside of a fully litigated rate proceeding. As I
15 have previously testified, AOBA finds Pepco's proposal for adjustment of its base
16 rate charges outside of a fully litigated proceeding inappropriate and inconsistent
17 with sound ratemaking practice. However, now Pepco Witness Blazunas,
18 through his Third Supplemental Testimony, seeks to make similar manipulative
19 changes to the Company's **forecasted** billing determinants on an a priori basis.
20 Those changes have nothing to do with the correction of "errors" or the use of
21 "updated" information. Rather, they are being used by Pepco to further alter the

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1 charges it would apply to its largest non-residential demand-metered rate
2 classes. These practices, if permitted, would effectively eliminate any basis the
3 Commission would have to support a determination that its approved rates for
4 Pepco are “just and reasonable” and based on substantial evidence of record.

5 Pepco’s MRP proposals also employ an important, yet subtle, change in
6 ratemaking methods, and that change negatively impacts the integrity of the
7 Company’s overall rate proposals in this proceeding. The referenced change lies
8 in the difference between: **(1)** calculating authorized revenues and reconciling
9 revenues based on **actual** changes in numbers of customers after the conclusion
10 of each billing month (as is the Company’s current practice under its BSA
11 mechanism) and **(2)** the Company’s use of similar calculations based on
12 **forecasted** numbers of customers by month in the rate design process before
13 any actual data for each Rate Year are known.

14 AOBA has long been troubled by the assumption of a fixed relationship
15 between numbers of customers and authorized revenues for rate classes that
16 include substantial diversity of use among the customers that are included in
17 such classes and are billed separate demand charges. Where customers are
18 relatively homogeneous in their usage characteristics, the assumption of fixed
19 revenue per customer amounts may not greatly distort the cost recovery
20 responsibilities attributed to a class as changes in numbers of customers are
21 experienced. However, for classes with wide ranging usage levels and separate

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1 demand charges, the use of fixed revenue per customer relationships ignores
2 substantial diversity in load factors and usage levels within such classes. That
3 problem is further exacerbated by Pepco's reliance on **forecasted** numbers of
4 customers to depict what it argues are the Company's authorized revenue levels
5 for future periods.

6 In past proceedings, the revenue per customer amounts used by Pepco
7 were tied to known historic test year data for numbers of customers and
8 Commission-approved revenue requirements by class. Under the Company's
9 MRP proposals in this proceeding everything is based on estimates without any
10 established record to support the reasonableness or accuracy of Pepco's
11 forecast estimates.¹ The Company bases its Rate Year 1 Authorized Revenues
12 at present rates for each rate class on existing revenue per customer amounts
13 multiplied by partially forecasted "bridge year" data for numbers of customers.
14 Pepco's Rate Year 2 Authorized Revenues at present rates are the product of
15 multiplying fully forecasted Rate Year 2 numbers of customers by class and Rate
16 Year 1 **proposed** revenue per customer amounts which again were based on
17 partially forecasted numbers of Rate Year 1 customers. Likewise, Pepco's

¹ This is **not** a demand for perfect accuracy in forecasting. As I have previously stated, if we knew future outcomes with perfect accuracy, there would be no need for forecasting. However, it would be helpful if Pepco could provide the Commission and the parties a measure of the magnitude of potential errors associated with the Company's forecasts of billing determinants.

AOBA certainly does not believe that Pepco could have or should have been able to forecast the changes in usage by rate class, particularly for commercial demand-metered rate classes, that have resulted from the Covid-19 pandemic, but the substantial changes in usage experienced as a result of the Covid-19 pandemic are illustrative of the magnitude of the uncertainties that can be associated with forecasts of billing determinants for future periods.

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1 claimed Rate Year 3 Authorized Revenues by class reflect fully forecasted Rate
2 Year 3 numbers of customers multiplied by revenue per customer amounts that
3 are based on fully forecasted Rate Year 2 numbers of customers. At no point in
4 the process are the revenue per customer amounts that Pepco uses for future
5 rate years recomputed using any measure of actual numbers of customers.

6 Moreover, the revenue reconciliations within Pepco's BSA mechanism
7 **never** examine the accuracy of the forecasted revenue per customer data on
8 which the Company's annualized revenues for each rate class are computed in
9 its rate filings in this proceeding. For this reason, Pepco's position that each rate
10 class is responsible for the Company's recovery of the fixed revenue per
11 customer amounts it **projects** regardless of the accuracy of such projections
12 must be challenged. The Commission cannot provide adequate or appropriate
13 ratepayer protection if a monopoly utility, such as Pepco, is permitted to
14 manipulate its rates using estimates for which it is never held accountable.
15 Given the errors and problems that Pepco has identified in its own data and
16 estimates during the course of this proceeding, it is clear that Pepco has not
17 taken adequate steps to ensure the quality of its rate design data and calcul-
18 ations. Thus, the record of this proceeding strongly suggests that more intensive
19 review of Pepco's data and forecast estimates (particularly with respect to billing
20 determinants), is necessary and greater oversight, not lesser oversight, of
21 Pepco's ratemaking practices is required.

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III. DISCUSSION OF ISSUES

Q. HOW IS YOUR DISCUSSION OF ISSUES ORGANIZED?

A. The discussion of issues presented herein is structured in seven sections. Section A addressed the merits of the proposed revisions to demand billing determinants that are presented in Pepco's July 28, 2020 Errata filing. Section B examines the bill impact analyses that Pepco relies upon and the data and assumptions underlying the bill comparison computations that Pepco presents for its Revised MRP Enhanced rate design proposals. Section C identifies an important inconsistency in the rate design rationales that Pepco has used to develop its Revised MRP and Enhanced MRP rate design proposals. Section D examines the impacts of the Company's Errata filing on Pepco's revenue requirements. Section E questions the appropriateness of the ERR credits Pepco proposes to apply in Rate Year 3. Section F responds to representations made by Pepco Witness Blazunas in his July 31, 2020 Third Supplemental Testimony regarding BSA revenue under-recoveries. Section G provides perspective regarding broader implications of Pepco's Errata filing, and finally Section H discusses the content of certain data request responses provided by Pepco on October 6, 2020.

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1 **A. Pepco's Revisions to its Forecasted Demand Billing Determinants**

2
3 **Q. SHOULD THE COMMISSION ACCEPT PEPCO'S REVISIONS TO ITS**
4 **FORECASTED DEMAND BILLING DETERMINANTS AS "CORRECTIONS"**
5 **TO THE COMPANY'S PREVIOUSLY USED BILLING DETERMINANTS?**

6 A. No. Forecasted data, by their very nature, are neither correct nor incorrect.
7 Forecasts only yield **estimates** of future outcomes. Over time we may assess
8 the reliability of previous forecasts and forecasting methods, but it is generally
9 understood that forecasts are rarely precise determinations of future outcomes.
10 In that context, Pepco represents that its Errata corrects an "error" in its initial
11 forecasted demand billing determinant. However, that representation is a
12 distortion of fact since there is no basis for assessing an "error" in forecasted
13 data until after the forecast period is completed and the actual outcome is known.
14 If future outcomes were known with certainty there would be no need for
15 forecasting. Although Pepco may believe that its revised forecast of demand
16 billing determinants is more in-line with its current expectations, that is not a
17 testable hypothesis on an ***a priori*** basis.

18
19 **Q. WHAT SUPPORT HAS PEPCO OFFERED FOR THE REVISIONS IT PRO-**
20 **POSES TO ITS FORECASTED DEMAND BILLING DETERMINANTS?**

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1 A. As explained by Pepco Witness Blazunas, the changes in the Company's
2 forecasted demand billing determinants are a product of changes in the load
3 factor relationships by rate class that the Company has used to estimate billing
4 demands. Those changes are documented in a multi-tab spreadsheet analysis
5 that the Company has provided as Attachment O to the Company's July 28,
6 2020, Supplemental Amended Response to Staff Data Request 24-24. Included
7 in Attachment O are two worksheets that detail the Company's initial and revised
8 load factor assumptions by rate class, as well as the reported actual kW and kWh
9 by month for the twelve months ended December 2018. (Unfortunately,
10 Attachment O to the Company's July 28, 2020, Supplemental Amended
11 Response to Staff Data Request 24-24 is a multi-tab spreadsheet file that has not
12 been formatted for printing).

13
14 **Q. HAVE YOU REVIEWED THE DATA AND ANALYSES PRESENTED IN**
15 **"ATTACHMENT O" TO PEPCO'S SUPPLEMENTAL AMENDED RESPONSE**
16 **TO STAFF DATA REQUEST 24-24?**

17 A. I have. I also developed a spreadsheet file for comparative purposes that
18 contains historical billing kW and kWh and load factors implicit in the billing data
19 used by Pepco in prior cases before this Commission and in its previous filings in
20 this proceeding. (See **Exhibit Aoba (5A)-1.**)

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1 **Q. WHAT DID YOU ASCERTAIN FROM YOUR EXAMINATION OF THE DATA**
2 **AND LOAD FACTOR RELATIONSHIPS USED BY PEPSCO IN “ATTACHMENT**
3 **O” TO PEPSCO’S SUPPLEMENTAL AMENDED RESPONSE TO STAFF DATA**
4 **REQUEST 24-24 AND THE DATA USED BY PEPSCO IN PREVIOUS FILINGS?**

5 A. The Revised demand billing determinants that Pepco now offers are not a
6 function of updates or corrections to prior actual information. Rather, Pepco’s
7 proposed late hour revisions to its **forecasted** Billing Demands in this proceeding
8 are simply a function of changed assumptions regarding the load factor
9 relationships that Pepco now believes may be indicative of demand and load
10 factor relationships in future rate years.

11 In the Company’s rate design exhibits in Formal Case Nos. 1139 and
12 1150,² as well as in the Company’s Direct and Rebuttal Testimonies in this
13 proceeding, Pepco weather-normalized its kWh use by rate class, but made no
14 weather–normalization adjustments to its demand billing determinants. In the
15 Company’s July 28, 2020 Errata filing and the related July 31, 2020 Supple-
16 mental Testimony of Witness Blazunas that methodology is changed. Instead of
17 accepting that the weather-normalization of kWh would alter the relationships
18 between kWh and kW (i.e., load factors) for demand-metered classes, Pepco’s
19 July 28, 2020 Errata filing and the related July 31, 2020 Supplemental Testimony

² A caveat is necessary for the billing determinants used by Pepco in its presentation of Settlement rates in Exhibit Pepco (3E)-1 in Formal Case No. 1150. In that filing, Pepco significantly altered the numbers of customers, kWh and kW billing demand units used to design rates for the GT-LV class without identifying or explaining the derivation of those changes.

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1 now assume that the actual **non-weather-normalized** load factor relationships
2 identified for calendar year **2018** should dictate the load factor relationships and
3 kW demand billing units used for each projected rate year. Effectively, Pepco
4 now assumes (contrary to its past practice) that it's forecasted demand billing
5 determinants should be adjusted in proportion to its estimates of weather-
6 normalized kWh by month.

7
8 **Q. WHAT DATA AND ANALYSES ARE RELIED UPON BY PEPSCO TO SUPPORT**
9 **THE APPROPRIATENESS OF ITS CHANGE IN METHODOLOGY FOR**
10 **ESTIMATING BILLING DEMANDS FOR ITS PROJECTED RATE YEARS?**

11 **A.** The only support offered by Pepco for its change in methodology comprises the
12 **non-weather-normalized** kW, kWh, and load factors for calendar year 2018 as
13 shown in the electronic spreadsheet file that constitutes Attachment O to Pepco's
14 July 29, 2020, **Supplemental Amended Response** to Staff Data Request 24-24.
15 Attachment O demonstrates that the load factor relationships that Pepco
16 employed to compute its revised estimates of Billing Demand kW are based
17 solely on monthly **non-weather-normalized** kW and kWh relationships for a
18 single year (i.e., calendar year 2018) without examination of similar relationships
19 for any other years.³ Thus, there is no foundation for a finding that the 2018
20 actual load factor relationships on which Pepco has relied to generate its Revised

³ This observation is verified by Pepco's October 6, 2020 response to Staff Data Request 26-1.

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1 demand billing determinants is any more indicative of future demand
2 relationships than either: (1) the actual kW and kWh relationships for any other
3 period of time; or (2) the Company's prior assumption that billing demands would
4 not change with the weather normalization of actual kWh.

5
6 **Q. IS PEPCO'S USE OF LOAD FACTOR RELATIONSHIPS TO PRODUCE ITS**
7 **REVISED ESTIMATES OF BILLING DEMAND KW CONSISTENT WITH ITS**
8 **PAST PRACTICES?**

9 A. No, it is not. The pages of **Exhibit AOBA (5A)-1** provide the **actual** (non-
10 weather normalized) and **weather-normalized** kWh, kW, and load factors for
11 demand-metered rate classes used by Pepco in prior cases and in each of its
12 filings in this proceeding (i.e., its Direct, Rebuttal (unrevised), Surrebuttal
13 (unrevised), and Errata (revised) rate design exhibits in this case. The data
14 presented in **Exhibit AOBA (5A)-1** clearly show that the Company's weather
15 normalization of kWh billing determinants in Formal Case Nos. 1139 and 1150
16 had **no impact on the billing demands** that Pepco used for rate design
17 purposes.⁴

⁴ The only possible exception is found in the billing determinants used in Pepco's Settlement Testimony in Formal Case No. 1150. As explained in greater detail later in this testimony, Pepco's Settlement rate design exhibit significantly changed all of its weather normalized billing determinants (including its numbers of customers – which do not typically vary with weather) for the GT-LV class. Those changes were made in the Company's settlement exhibits in Formal Case No. 1150 without explanation and without notification to the Settling parties. Moreover, Pepco has subsequently represented that those billing determinants were erroneous.

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1 **Exhibit AOBA (5A)-1** also supports a similar observation with respect to
2 the billing determinants Pepco chose to use in its Direct, Rebuttal, and
3 Surrebuttal rate designs in this proceeding. In each of those filings the
4 Company's weather normalization of billing determinants only impacts its kWh by
5 rate class. The number of demand billing units for each rate year was not
6 affected by the Company's weather-normalization of kWh.

7 As a result of the Company's change in methodology, Pepco's revised
8 billing demand estimates assume that each change in forecasted monthly kWh
9 yields now a proportionate change in the Company's estimated billing demand
10 for the month. Yet, no foundation has been established for an assumption of
11 proportional changes in kWh usage and kW billing demands. However, energy
12 management systems in commercial buildings are typically programmed to
13 minimize changes in kW demands as kWh use in a building varies. Thus, the
14 presumption relied upon by Pepco to construct the revised estimates of billing
15 demands in its Errata filing (i.e., that kW demands change in proportion to kWh)
16 is inconsistent with widely used building management practices. Moreover, given
17 that Pepco bills more than **70%** of its total distribution charges on a dollars per
18 kW basis,⁵ efforts by building managers to limit fluctuations in metered kW
19 demands are essential for staying within utility cost budgets. For these reasons,

⁵ See **Exhibit AOBA (5A)-2** which shows that for Pepco's GT and MGT rate classes the Company bills over **70%** of its total Distribution Revenue at present rates through demand charges.

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1 this Commission must seriously question the basic premise of **revised** billing
2 demand estimates that purportedly necessitated Pepco's Errata filing.

3
4 **Q. SHOULD ADDITIONAL OBSERVATIONS BE MADE WITH RESPECT TO THE**
5 **LOAD FACTORS THAT PEPSCO HAS USED FOR ITS DEMAND-METERED**
6 **RATE CLASSES?**

7 **A. Yes. Exhibit AOBA (5A)-3** demonstrates that the load factors Pepco has used
8 to estimate revised billing demands for its demand-metered rate classes in the
9 District are more reflective of its non-weather normalized 2018 load factor
10 relationships than the relationships it has previously reflected in weather-
11 normalized billing determinants. Although the load factors resulting from the
12 Company's revised billing determinants vary slightly from those I have computed,
13 that appears to be the result of Pepco's use of monthly load factor relationships
14 where the load factors I have computed are based on the seasonal and annual
15 billing determinants Pepco has used in its filed rate design exhibits. The load
16 factors for all demand-metered rate classes are increased relative to those
17 reflected by the Company's originally filed billing determinants data. Yet again,
18 no analytic support is offered for the Company's use of non-weather-normalized
19 load factor relationships.

20 **Exhibit AOBA (5A)-4** provides a comparison of the billing demand units
21 Pepco has employed in each of its filed rate designs for each demand-metered

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1 rate class in this proceeding. The observable changes in billing demand units for
2 the GSD-LV, MGT-LV and GT-LV classes are particularly notable. The
3 differences between the Company's original May 30, 2019 data and the revised
4 data now presented incorporate both the Company's correction to the legacy GT-
5 LV billing determinants used in the Company's Settlement rate designs for
6 Formal Case No. 1150 as well as its July 2020 changes to its demand estimation
7 methodology.

8 **Exhibit AOBA (5A)-5** documents the changes in billing determinants that
9 Pepco reflected in its Rebuttal testimony. The "errors" that Pepco claimed to
10 correct in its Rebuttal testimony were purportedly the result of the creation of the
11 MGT-LV class and re-alignment of GT-LV billing determinants. However,
12 Pepco's most recent billing determinants revisions affect all of the Company's
13 demand-metered rate classes. If the Commission accepts Pepco's July 2020
14 load factor-related revisions to billing determinants for demand-metered rate
15 classes, then the Commission must also question whether Pepco erroneously
16 determined its demand billing units for the GSD-LV, GSD-3A, and GT-3A in prior
17 proceedings.

18
19 **Q. DO OTHER CONSIDERATIONS ALSO CONTRIBUTE TO THE INAPPRO-**
20 **PRIATE NATURE OF PEPCO'S RELIANCE ON LOAD FACTORS COMPUTED**
21 **FROM NON-WEATHER-NORMALIZED DATA FOR 2018?**

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1 A. Yes. **Exhibit AOBA (5A)-6** compares the Company's actual and 30-year
2 average (i.e., normal) heating and cooling degree day measures by month for
3 calendar year 2018. That comparison demonstrates that the actual 2018 heating
4 and cooling degree day measures were not "normal" either on a monthly basis or
5 in aggregate for the year. For the year, actual cooling degree days ("CDD 65")
6 for 2018 were 21.8% above normal. Likewise, actual 2018 heating degree days
7 ("HDD65" and "HDD35") were above normal. The reported actual HDD65
8 measure was 6.9% above normal and the HDD35 measure (which is an indicator
9 of the frequency of extreme cold temperatures) was 16.5% above normal.
10 Moreover, given that Pepco has elected to rely upon monthly load factors, it
11 should be noted that the variations from normal degree day measures are NOT
12 uniformly distributed across the months of the year. In particular, the increase in
13 the HDD35 for calendar year 2018 is concentrated in the month of January 2018,
14 while the HDD35 measures for all other winter months in 2018 are noticeably
15 below the 30-year average HDD35 measures for those months. Further, these
16 2018 departures from normal weather alter the weighting of individual months
17 when estimating annual or seasonal demands for future years.

18 It is inappropriate to adjust kWh to reflect "normalized" weather but adjust
19 kW demands based on load factor relationships that are not weather normalized.
20 Monthly customer class kWh use often varies noticeably from year to year.
21 Previously, Pepco addressed this concern by assuming variations in weather

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1 would not significantly impact billing kW. However, in its estimation of revised
2 billing demands Pepco departs from that past practice and assumes (with no
3 analytic support) that 2018 kWh usage by rate class for demand-metered classes
4 can reasonably be relied upon to project future kWh requirements on either a
5 monthly, seasonal, or annual basis. Likewise, Pepco provides no demonstration
6 that the load factor relationships observed for the months of calendar year 2018
7 will be indicative of the load factor relationships that should be expected in the
8 context of normal weather kWh for each of the projected rate years included in
9 the Company's MRP proposals. With more than 70% of Pepco's base distri-
10 bution revenue for the GT and MGT classes and roughly 50% of revenue for GS
11 demand rate classifications billed on the basis of metered demands, proper
12 weather normalization of billing kW demands for future periods is arguably more
13 important than the Company's weather normalization of metered kWh usage.
14 Pepco's rather off-handed assumption that actual kW and kWh measures for a
15 single historic year provide reliable and appropriate estimates of future billing kW
16 demands is simply not credible.

17
18 **Q. ARE THERE ADDED REASONS FOR THE COMMISSION TO QUESTION THE**
19 **REVISED BILLING DETERMINANTS ON WHICH PEPKO HAS RELIED IN**
20 **THIS PROCEEDING?**

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1 A. Yes. The billing units used by the Company throughout this proceeding are built
2 on calendar year 2018 data when the Company's chosen test year is the twelve
3 months ended June 2019. When the Company filed its updates to actuals on
4 September 16, 2019, it **never updated** the historic billing determinants from
5 which its future rate year billing determinants estimates were developed and on
6 which the billing determinants in the Company's Traditional Test Period
7 Compliance Filing ("TTPCF") rate proposals are premised. As a result, Pepco's
8 billing determinants and rate designs have been out of synchronization with its
9 revenue requirements throughout this proceeding and do not provide appropriate
10 and realistic assessments of future numbers of customers, kW demands, and
11 kWh usage by rate class.

12 Pepco may argue that updating of the billing determinants data was not
13 necessary. However, accepting **arguendo** Pepco's use of historic monthly **non-**
14 **weather-normalized** load factor relationships for a single historic year as
15 indicative of the load factors that will be experienced in future rate years, the
16 sensitivity of Pepco's forecasted demand billing determinants to the historic load
17 data upon which Pepco has relied should be obvious. Without a more detailed
18 and thoughtful investigation of historic monthly load factor relationships, Pepco's
19 suggestion that estimates of future billing demands on one-year's non-weather
20 normalized data must be rejected. I also note that to date Pepco has not even

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1 constructed a methodology for estimating **weather-normalized** monthly billing
2 demands.

3
4 **B. Pepco's Bill Impact Analyses**

5
6 **Q. DOES PEPSCO PURPORT TO PROVIDE A BILL IMPACT ANALYSIS FOR ITS**
7 **REVISED MRP ENHANCED RATES?**

8 A. Yes. Pepco provided bill impact analyses for its **Revised** MRP Enhanced rates
9 (in electronic format only) as Attachment E to the Company's July 24, 2020
10 **Amended** Response to Staff Data Request 24-24.

11
12 **Q. DO PEPSCO'S BILL COMPARISONS PROPERLY PORTRAY THE CHANGES**
13 **THAT CUSTOMERS CAN EXPECT TO SEE ON THEIR MONTHLY BILLS?**

14 A. No, they do not. I have provided demonstration of the actual impacts of Pepco's
15 revised MRP Enhanced rates in AOBA's response to Staff Data Request 3-3.⁶
16 Pepco has made representations that rates for all customers will be frozen (i.e.,
17 held at current levels) for Rate Years 1 and 2, but in fact, customers in nearly all
18 classes will see changes in the amounts billed for any given level of usage. Of
19 particular concern to AOBA is that, if Pepco's Enhanced MRP rates are
20 approved, GT-LV and MGT-LV customers will experience increases in their

⁶ See the data request responses included in Attachment A to this testimony.

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1 monthly bills, and for large numbers of Rate Schedule GT-LV customers those
2 increases in their bills would equate to **double-digit percentage increases**.

3
4 **Q. PLEASE EXPLAIN FURTHER.**

5 A. Pepco's bill comparison exhibits only provide summary information. That
6 summary information does not disclose the substantial data and calculations
7 from which those summary results are produced. As a result, important details
8 regarding the data, assumptions, and calculations used to compute the Com-
9 pany's bills comparisons cannot be observed from the content of Pepco's printed
10 bill comparison exhibits.

11 As explained in AOBA's response to Staff Data Request 3-3, Pepco's bill
12 comparisons for Rate Year 1 and Rate Year 2 are tautological. The Company's
13 Rate Year 1 and Rate Year 2 bill comparisons simply compare identical charges
14 for present and proposed rates even though Pepco's rate design exhibits show
15 clear changes in the Company's proposed charges by rate class. For example,
16 Exhibit Pepco (6F)-22, page 124 of 344, shows a proposed **76%** Rate Year 1
17 increase in the kWh charges for Rate Schedule GT-LV⁷ with no offsetting
18 reductions in any other charge or new or increased credits that would be
19 reflected on monthly bills for Rate Schedule GT-LV customers. In other words,
20 the base rate charges that Pepco uses to compute its bill comparisons for GT-LV

⁷ Apparently, **gradualism** in the adjustment of charges by customers wasn't a consideration in Pepco's development of its proposed charges, particularly for Rate Schedule GT-LV customers.

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1 customers do not reflect the content of its rate design exhibits. When the detail
2 supporting Pepco's bill comparisons is examined, we find that the Company has
3 simply assumed that its charges at present rates are the same as the charges it
4 would apply at proposed rates.

5 The same is true for the Company's Rate Year 2 bill comparisons. For
6 each class Pepco inappropriately assumes that its charges at present rates are
7 identical to its Proposed Rate Year 2 charges. Although the Company's
8 proposed changes in Rate Year 2 charges are comparatively small, they are
9 clearly not identical to the Company's proposed Rate Year 1 charges for any rate
10 class.⁸

11 Attachment A to AOBA's response to Staff Data Request 3-3⁹ contains
12 revised bill comparisons by rate class for each proposed MRP rate year based
13 on Pepco's Revised MRP Enhanced rate design proposals.¹⁰ The bill
14 comparisons contained in that attachment demonstrate that rates are **not**
15 **"frozen"** for any rate class in either Rate Year 1 or Rate Year 2. To the contrary,

⁸ The changes in charges that Pepco proposes by rate class can be readily observed from the data presented in pages 186 of 344 to 198 of 344 in Exhibit Pepco (6F)-22. For example, Exhibit Pepco (6F)-22, page 187 of 344, indicates that Pepco's charges for the first 400 kWh per month for MMA customers increase from **\$0.00891** at current rates to **\$0.00976** under the Company's proposed Rate Year 1 charges and to **\$0.01005** under Pepco's proposed Rate Year 2 charges. Again, without any offsetting decreases in other base rate charges or new or expanded rate credits that would be observable on customers' bills, the Commission should expect the Company's bill comparisons for MMA customers would show increases for all MMA accounts except those with zero kWh use. Yet, Pepco's bill impact analyses erroneously suggest the customers' bills would not increase for any given level of kWh use.

⁹ The electronic spreadsheet file supporting Attachment A to AOBA's response to Staff DR 3-3 is included herein by reference. Copies were provided to all parties on August 20, 2020.

¹⁰ A copy of the referenced attachment to AOBA's response to Staff Data Request 3-3 is provided in Attachment A to this testimony.

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1 most GT-LV customers and higher load factor MGT-LV customers would see
2 double digit increases in their total billed distribution charges (including
3 surcharges and credits) in Rate Year 1.¹¹

4
5 **Q. DO PEPCO'S BILL COMPARISONS FOR RATE YEAR 3 USE THE SAME**
6 **METHODS AND ASSUMPTIONS AS ITS RATE YEAR 1 AND RATE YEAR 2**
7 **BILL COMPARISONS?**

8 A. No. Pepco's computed bill comparisons for Rate Year 3 also distort the rate
9 increases that customers in each rate class can expect, but the methods and
10 assumptions used by the Company to compute Rate Year 3 bill impacts is not
11 the same as those used for Rate Years 1 and 2. For Rate Year 3, Pepco no
12 longer assumes that its current and proposed charges would be identical.
13 Instead, the Company, resorts to the use of "*imputed*" BSA adjustments¹² to its
14 Rate Year 3 current charges (i.e., its proposed Rate Year 2 charges) that serve
15 to reduce its calculated percentage rate increases.

16 Pepco's rationale for the imputed adjustment to its current charges is that
17 customers will have paid those amounts through monthly BSA adjustments. But

¹¹ If new rates are not approved for implementation until after Rate Year 1 (i.e., calendar year 2020) is completed, the percentage increases GT-LV and MGT-LV customers experience in their monthly bills will be even larger. The notion that their monthly bills will be frozen through the end of Rate Year 2 (i.e., the end of calendar year 2021) is totally fallacious.

¹² As I have previously discussed in this proceeding, the Company's use of "imputed" BSA adjustments to charges at present rates was first employed by the Company (without disclosure) in the bill impact analyses that were provided as part of the Company's Settlement Testimony in Formal Case No. 1150 and were used, again without disclosure in earlier bill comparison exhibits filed in this proceeding.

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1 such imputed adjustments to current rates in Pepco's bill comparison analyses
2 are inappropriate for two reasons. First, the BSA rate adjustments that cus-
3 tomers will actually experience during Rate Year 2 are not known and certain at
4 this time. Second, it must be anticipated that customers will also experience
5 monthly BSA rate adjustments during Rate Year 3, but Rate Year 3 BSA
6 amounts are not factored into Pepco's bill comparisons.

7 In Rate Year 3, Pepco's proposed charges, after recognition of Rider ERR
8 Credits, would still impose significant additional increases for most classes of
9 customers¹³ and particularly for the GT-LV and MGT-LV rate classes. The
10 Commission should also be sensitive to the fact that the expiration of Pepco's
11 proposed ERR Credits at the end of December 2022 will effectively yield
12 significant additional rate increases for all rate classes as of January 1, 2023.
13 The Commission can also expect that the magnitude of the overall rate increases
14 that District ratepayers can expect on or about January 1, 2023 will be further
15 amplified by Pepco's expected second MRP filing in 2022 which most likely will
16 reflect: (1) the Company's requests for recovery of Covid-19 costs; (2) the
17 termination of accelerated EDIT and Additional Subtraction Method credits; (3)
18 the restart of Regulatory Asset amortizations; and (4) further increases in the
19 Company's claimed capital and operating expenses.

¹³ As I discuss later in this testimony, Pepco's proposed ERR Credits for three small rate classes would inexplicably exceed the total increases the Company proposes for those classes over the three years of its proposed MRP period.

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1 **Q. HOW WOULD TOTAL BASE RATE REVENUE BY RATE CLASS BE**
2 **IMPACTED?**

3 A. The electronic workpaper provided as Attachment B to AOBA's response to Staff
4 Data Request 3-3¹⁴ and summarized in **Exhibit AOBA (5A)-7** computes the
5 **actual** increases in base rate revenues that would be experienced by each rate
6 class in each rate year under the Company's **revised MRP** and **revised MRP**
7 **Enhanced** rate proposals.¹⁵ The average **base rate increase** for GT-LV
8 customers in **Rate Year 1** would be **17.3%** and **11.0%** for MGT-LV customers.¹⁶
9 Greater detail regarding the impacts of the Company's Revised MRP Enhanced
10 rates for customers with various levels of usage within each rate class are
11 provided in Attachment A to Staff Data Requests 3-3.

12
13 **Q. HOW DO YOU EXPLAIN THE CHANGES IN REVENUE BY CLASS THAT YOU**
14 **COMPUTE FOR RATE YEARS 1 AND 2 WHEN PEPSCO REPRESENTS THAT**
15 **ITS DISTRIBUTION REVENUE BY CLASS WOULD NOT CHANGE IN THOSE**
16 **YEARS?**

¹⁴ The electronic spreadsheet that is Attachment B to AOBA's response to Staff DR 3-3 is included herein by reference. Copies were provided to all parties on August 20, 2020.

¹⁵ All percentage increases shown in **Exhibit AOBA (5A)-7** are computed from the Company's current tariff rates. Thus, for example, the Rate Year 3 increase shown for a class reflects the cumulative change that would be experienced in Rate Year 3 when the Company's proposed rates for that year are compared to its currently effective rates.

¹⁶ If, however, new rates are not approved for implementation prior to January 1, 2021 and the Company's proposed **Rate Year 2** charges are the first base rate changes that customers experience, then under that scenario, the average base rate increase for GT-LV customers would be **19.0%** and the average base rate increase for MGT-LV customers would be **12.4%**.

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1 A. Pepco's representation that its revenues by rate class would not change is wholly
2 dependent on its inclusion in its rate design analyses of Bill Stabilization
3 Adjustment amounts (i.e. Target Revenue Adjustments) that are never reflected
4 on customers' bills. As I explain in response to Staff Data Request 3-3, page 4,
5 the alleged "Bill Stabilization Adjustment" amounts in Pepco's Revised MRP
6 Enhanced rate design exhibits **disregard** the rules for BSA revenue adjustments
7 that are built into the Company's Rider BSA tariff. For example, Exhibit Pepco
8 (6F)-22, page 123 of 344, (also identified as Attachment D to Staff DR 24-24)
9 shows **Rate Year 1** a "**Bill Stabilization Adjustment**" for the **GT-LV** rate class of
10 **\$(11,915,688)**. That equates to **18.6%** of the GT-LV class distribution revenue at
11 current rates (i.e., **\$64,108,650**). However, the Company's tariff caps allowed
12 BSA rate adjustments at **10%** which in this case would not exceed **\$6,410,865**.

13
14 **C. Pepco's Inconsistent Rate Design Rationales**

15
16 **Q. WHAT IS THE RATIONALE OFFERED BY PEPSCO WITNESS BLAZUNAS**
17 **FOR WHY ALTERATION OF THE DEMAND BILLING DETERMINANTS USED**
18 **IN THE COMPANY'S REBUTTAL AND SURREBUTTAL MRP RATE DESIGNS**
19 **IS NECESSARY AT THIS TIME?**

20 A. Witness Blazunas' July 31, 2020, Third Supplemental Testimony suggests that
21 Pepco's revision of the demand (kW) billing determinants used in its Rebuttal and

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1 Surrebuttal MRP rate designs “*would ... result in base distribution rates for*
2 *Commercial classes with demand rate components designed to be too low,*
3 *thereby resulting in larger differences between billed distribution revenue and*
4 *authorized distribution revenue in the monthly Bill Stabilization Adjustment.*”¹⁷

5
6 **Q. CAN PEPSCO DETERMINE WITH CERTAINTY AT THIS TIME THAT THE**
7 **DEMAND BILLING UNITS USED IN ITS APRIL 8, 2020 REBUTTAL MRP**
8 **RATE DESIGNS AND ITS JUNE 1, 2020 SURREBUTTAL MRP RATE**
9 **DESIGNS WOULD RESULT IN “LARGER DIFFERENCES BETWEEN BILLED**
10 **DISTRIBUTION REVENUE AND AUTHORIZED DISTRIBUTION REVENUE IN**
11 **THE MONTHLY BILL STABILIZATION ADJUSTMENT”?**

12 **A.** No, it cannot, and Witness Blazunas’ representations regarding such a result
13 constitute nothing more than **speculation** regarding the Company’s future
14 revenue collections from its demand-metered rate classes.

15
16 **Q. IS WITNESS BLAZUNAS’ RATIONALE FOR REVISING THE DEMAND**
17 **BILLING UNITS USED IN PEPSCO’S REBUTTAL AND SURREBUTTAL MRP**
18 **RATE DESIGNS CONSISTENT WITH THE RATE DESIGN CHANGES PEPSCO**
19 **MAKES IN WITNESS BLAZUNAS’ THIRD SUPPLEMENTAL TESTIMONY**
20 **AND ERRATA EXHIBITS?**

¹⁷ Exhibit Pepco (6F), the Third Supplemental Testimony of Witness Blazunas, page 4, lines 7-11.

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1 A. No. Witness Blazunas' argues that the demand (kW) billing previously used
2 would "*result in base distribution rates for Commercial classes with demand rate*
3 *components designed to be too low.*" However, the revised rate designs
4 presented in his Errata and Third Supplemental Testimony **do not alter** the
5 Company's proposed base rate **demand charges** for Commercial rate classes.
6 Instead, Pepco seeks to recover the entire revenue impact of its revisions to
7 demand billing determinants through Distribution (kWh) charges. As a result, the
8 Company's proposed Rate Year 1 Distribution Charges per kWh for the GT-LV
9 rate class would **increase 76%** over the Company's currently applicable Rate
10 Schedule GT-LV Distribution Charges. This is shown quite clearly in Exhibit
11 Pepco (6F)-27, page 52 of 141, column (L). Exhibit Pepco (6F)-27, page 52 of
12 141, column (L), also shows **0% percent increases** in the Company's proposed
13 Kilowatt (demand) Charges and Monthly Customer Charge.

14
15 **Q. WHAT TRIGGERED PEPCO'S DETERMINATION IN LATE JULY 2020 THAT**
16 **THE DEMAND BILLING UNITS USED IN THE RATE DESIGNS PRESENTED**
17 **IN THE COMPANY'S REBUTTAL AND SURREBUTTAL TESTIMONIES**
18 **NEEDED REVISION?**

19 A. The purported errors in Pepco's demand (kW) billing determinants were only
20 suggested **after** the Company responded to Staff Data Requested 24-24. In
21 other words, it took questioning by persons outside of the Company for it to

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1 reconsider the methods it used to estimate demands for future rate years. This is
2 reminiscent of the Company's representation in this proceeding that its rates for
3 GT-LV and MGT-LV customers were incorrectly computed in Formal Case Nos.
4 1139 and 1150. As Pepco personnel subsequently disclosed during the
5 Technical Conference on September 19, 2020, Pepco only became aware that
6 the billing determinants it used in Formal Case Nos. 1139 and 1150 were
7 incorrect when it was brought to Pepco's attention by a person outside of the
8 Company.

9
10 **Q. HOW DO THE COMPANY'S REVISIONS TO THE DEMAND BILLING**
11 **DETERMINANTS IN ITS ERRATA FILING DIFFER FROM THOSE WHICH**
12 **PEPCO PRESENTED IN ITS REBUTTAL TESTIMONY?**

13 A. The revisions to demand billing determinants in the Company's April 8, 2020
14 Rebuttal Testimony have two components. First, Pepco revised its TTPCF billing
15 determinants for all demand metered rate classes to address alleged "errors" in
16 the Company's rate designs in Formal Case Nos. 1139 and 1150. Second, the
17 Company makes "synchronization" adjustments to its MRP billing determinants
18 for the GT-LV and MGT-LV classes. As I previously explained, the billing
19 determinant revisions Pepco now presents are the result of changes in the
20 assumptions and methods the Company has used to estimate billing demand for
21 future rate years. In multiple previously filings in this and prior proceedings,

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1 Pepco assumed that kW demands would not change with changes in billing kWh.
2 However, in the Company's Errata filing and Witness Blazunas' July 31, 2020
3 Third Supplemental Testimony, the Company changes its billing demand
4 estimation methods to arbitrarily assume that the load factors reflected in actual
5 billing data for calendar year 2018 must be maintained.

6
7 **Q. WHAT SUPPORT HAS PEPSCO PROVIDED FOR ITS CHANGE IN METHOD-**
8 **LOGY FOR ESTIMATING CHANGES IN BILLING DEMANDS UNITS?**

9 A. None. Pepco introduces its new assumption regarding load factor relationships
10 without offering any evidence that its monthly load factor relationships in 2018
11 are indicative of reasonably anticipated future load factor relationships for its
12 demand-metered rate classes in the District. Moreover, Pepco implements that
13 change without offering any assessment of trends in load factor relationships
14 over time for its demand-metered customer classes. In the absence of greater
15 analytic support for the reasonableness and appropriateness of Pepco's eleventh
16 hour change in demand estimation methods, those methods and the associated
17 changes in kW billing units must be rejected as arbitrary and not supported by
18 substantial record.

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1 **D. Errata Impact on Pepco's Revenue Requirements**

2
3 **Q. SHOULD THE COMMISSION ACCEPT PEPCO'S REPRESENTATIONS**
4 **REGARDING THE REVENUE REQUIREMENTS IMPACT OF THE REVISIONS**
5 **TO BILLING DETERMINANTS THE COMPANY NOW PROPOSES TO USE?**

6 A. No. Witness Wolverton rationales confuse the roles of the base rate determin-
7 ation process and the Company's BSA mechanism. As a result, the procedures
8 that Witness Wolverton describes for determining authorized annual revenue by
9 rate class represent a marked departure from the Company's past ratemaking
10 practices. The Company effectively puts the proverbial "*cart before the horse.*"
11 Witness Wolverton submits, "*The BSA means that Pepco's revenues are equal to*
12 *the number of customers multiplied by the authorized revenue per customer*
13 *targets.*"¹⁸ However, he overlooks the fact that the BSA mechanism was
14 designed to provide for **after-the-fact** reconciliations of revenues based on
15 **actual** numbers of customers by rate class. The actual numbers of customers by
16 rate class for future rate years cannot be known with certainty at the time rates
17 are developed for a **projected** rate year under the Company's MRP proposals.

18 An implicit assumption in Witness Wolverton's testimony is that the actual
19 monthly numbers of customers billed for each rate class during a projected rate
20 year will precisely equal the Company's estimated numbers of customers billed

¹⁸ Exhibit Pepco (7C), the Fourth Supplemental Testimony of Witness Wolverton, filed July 31, 2020, page 2, lines 13-14.

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1 by month for the projected rate year. Yet, rarely, if ever, has that occurred for
2 classes with more than a handful of customers. Thus, Pepco's annualization of
3 revenues for **projected** rate years unjustifiably assumes that the actual numbers
4 of customers for each rate year are known and certain before the rate year
5 begins. In essence, Pepco misappropriates and misapplies the **after-the-fact**
6 reconciliation process contained in the BSA mechanism to inappropriately
7 annualize revenues on an **a priori** basis using estimated numbers of customers
8 by rate class. In other words, Pepco is using a mechanism designed for after-
9 the-fact revenue reconciliations to establish forward looking revenue targets
10 based on nothing but estimates.

11
12 **Q. DOES PEPKO'S ANNUALIZATION OF REVENUES AT CURRENT RATES**
13 **FOR PROJECTED RATE YEARS IN THIS PROCEEDING DIFFER**
14 **SUBSTANTIVELY FROM THE REVENUE ANNUALIZATIONS IT HAS USED**
15 **IN PRIOR PROCEEDINGS?**

16 A. Yes. In past proceedings Pepco has annualized revenues by rate class based
17 on **known and certain** numbers of customers for identified historic test periods.
18 By contrast, Pepco's efforts to compute annualized revenue by rate class for
19 projected periods in this proceeding are based on **estimates** of monthly numbers
20 of customers for **future** periods. The difference between reliance on known and
21 certain historic data and use of estimates for future periods is substantive.

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1 Pepco's reliance on estimates loses all ties to "real world" results and opens the
2 ratemaking process to the unwarranted and potentially abusive use of discretion.

3 In this context, the **change in the function** of the "Bill Stabilization
4 Adjustment" lines in Exhibit Pepco (5F)-6 and in the Company's Revised MRP
5 Enhanced rate design Exhibit Pepco (6F)-27 becomes significant. In response to
6 AOBA Data Request 6-2, Witness Blazunas explained that the function of the
7 "Bill Stabilization Adjustment" lines in Exhibit Pepco (5F)-6 differs from the
8 function of the lines labeled BSA/Revenue Annualization in the Company's
9 previously filed MRP rate design exhibits. As used in Exhibit Pepco (5F)-6 the
10 Company's "Bill Stabilization Adjustment" lines are the same as "Target Revenue
11 Adjustment." In other words, the Company computes a Target Level of Revenue
12 for each rate class based on **estimated** (rather than **historic actual**) numbers of
13 customers and then makes an adjustment to the revenue requirement for each
14 class to ensure that its Targeted level of revenue for the class based on
15 **estimated numbers of customers** is achieved.

16
17 **Q. HOW DO YOUR CONCERNS RELATE TO WITNESS WOLVERTON'S MRP**
18 **ENHANCED REVENUE REQUIREMENTS PRESENTATION?**

19 A. Exhibit Pepco (6C)-1, page 4 of 67, line 13, purports to hold constant the
20 Company's revenues from Sales of Electricity for the test year, a bridge year (the
21 twelve months ended December 2019), and each of the Company's projected

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1 Rate Years. For all of those periods, Pepco's representations of its revenues are
2 identical. This necessarily assumes that the actual numbers of customers by
3 rate class by month exactly equal the Company's estimates. It also does not
4 reflect Pepco's proposed changes in billing determinants. Thus, the uniform level
5 of revenues shown in Witness Wolverton's exhibit can only be maintained by
6 arbitrarily assuming that actual numbers of customers will match the Company's
7 forecasted numbers of customers and thereby Pepco's authorized revenues
8 thereby will necessarily conform to the Company's Revenue Targets.

9 In past proceedings, Pepco's rate design exhibits were structured to
10 produce an effective **proof of revenues**. In this proceeding no effective proof of
11 revenues is provided. Instead, Pepco forces its estimates of revenue at present
12 rates to a Target Revenue level for each rate class through the use of "Target
13 Revenue Adjustments" (a.k.a., the **new function** of the "Bill Stabilization Adjust-
14 ment" line in Pepco's Enhanced MRP rate design exhibits).¹⁹

15
16 **Q. DO YOU HAVE ANY OTHER CONCERNS REGARDING THE IMPACTS OF**
17 **PEPCO'S CHANGES IN BILLING DETERMINANTS ON ITS REQUESTED**
18 **REVENUE REQUIREMENTS?**

19 **A.** Yes, I do. Pepco's revised demand billing determinants remove more than 240
20 MW of demand billing units from its previously estimated demand units for its

¹⁹ See Pepco's response to AOBA Data Request 6-2. Also, see my July 27, 2020 Supplemental Surrebuttal Testimony, Exhibit AOBA (4A), page 23, lines 12-17.

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1 demand-metered rate classes.²⁰ Yet, Pepco offers no assessment of how that
2 reduction in projected customer demands would impact its distribution system
3 planning and budgeted capital expenditures. Unless the Company's distribution
4 system planning and ratemaking are totally disjointed, a reduction of that
5 magnitude should have some perceptible impact on the Company's planning of
6 incremental capital expenditures for load growth and reliability.

7
8 **E. Pepco's Distribution of ERR Credits**

9
10 **Q. IS PEPCO'S PROPOSED APPLICATION OF EER RIDER RATE CREDITS IN**
11 **RATE YEAR THREE REASONABLE AND APPROPRIATE?**

12 **A.** No. There are several problems with Pepco's proposed application of ERR
13 Credits.

14 First, the magnitudes of the rate increases that Pepco customers in the
15 District can anticipate under the Company's allegedly "Enhanced" MRP
16 proposals are dramatic. The temporary, one-year ERR credits simply disguise
17 the rate shock that District ratepayers will ultimately experience. When those

²⁰ The Company's elimination of 240 MW of demand billing units equates to an average of 20 MW per month. However, the billing kW estimates provided in Attachment O to Pepco response to Staff Data Request 24-24 indicates that changes in kW demands computed by Pepco for the months of calendar year 2018 were not evenly distributed across the months of the year. **Exhibit AOBA (5A)-8** demonstrates that the Company's revised billing determinants had a greatly disproportionate **downward impact** on demands for the month of August. Pepco's revised billing demand estimate for August 2018 lowers that month's demands for all demand metered rate classes by **356,724 kW**. Given that August is typically the peak demand month for Pepco's District of Columbia distribution system, it is difficult to believe that such a reduction would have no impact on Pepco's required capital expenditures for load growth and reliability.

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1 credits expire at the end of calendar year 2022, customers will face significant
2 rate increases without even addressing other factors that can be expected to
3 place upward pressure on Pepco's charges for electric distribution service in the
4 District. Other effective cost increases that can be expected to impact rates for
5 District consumers must also be considered. Those other cost considerations
6 include: deferred Covid-19 related costs, the end of accelerated tax EDIT and
7 Additional Subtraction Method amortizations, the restart of Regulatory Asset
8 amortizations; and further increases in Pepco's on-going costs of doing business.
9 Thus, Pepco's rates for 2023 and beyond are likely to constitute substantial rate
10 shock for large numbers of Pepco customers in the District. Moreover, Pepco's
11 Revised MRP Enhanced rate design proposal will only further amplify those
12 impacts for customers in most of the Company's demand metered rate
13 classifications.

14 Second, the ERR Credits that Pepco proposes to apply in Rate Year 3
15 are, at best, arbitrary and capricious. The Company's proposed distribution of
16 ERR credits is unrelated to any identified need for rate relief by rate class. It also
17 has no discernible ties to class costs of service and the need for improvement in
18 the extreme existing disparities in class relative rates of return. Rather, the
19 Company's proposed offering of short-lived rate credits are simply reflective of
20 Pepco's efforts to gain approval of much larger effective rate increases without

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1 any substantial efforts on its part to trim its operating and capital costs in light of
2 the significant economic disruptions faced by its customers.

3 Third, Pepco's proposed distribution of ERR Credits produce grossly
4 disproportionate rate benefits for certain rate classes.

5
6 **Q. CAN YOU DESCRIBE THE GROSSLY DISPROPORTIONATE BENEFIT THAT**
7 **PEPCO'S PROPOSED ERR CREDITS WOULD PROVIDE FOR CERTAIN**
8 **RATE CLASSES?**

9 A. Yes. **Exhibit AOBA (5A)-9** shows that the Company's proposed Rider ERR rate
10 credits for three rate classes (i.e., the MMA, GS-3A, and GT-3B rate classes) are
11 greater than the Rate Year 3 increases that Pepco proposes for those classes.
12 Moreover, for one of those classes (GT-3B), Pepco's proposed ERR Rider rate
13 credits exceed the class's entire revenue requirement at present rates. In other
14 words, they would produce a result in which Pepco would effectively pay for the
15 customer in the affected class to take electric service in calendar year 2022 (i.e.,
16 Pepco's MRP Rate Year 3). Clearly, Pepco's ERR Credit proposals are not the
17 product of thoughtful and well-constructed rate design considerations.

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F. Pepco's BSA Under-Recovery Claim

**Q. WHAT ESTIMATES OF BSA UNDER-RECOVERIES ARE PRESENTED BY
PEPCO WITNESS BLAZUNAS IN HIS JULY 31, 2020 THIRD SUPPLE-
MENTAL TESTIMONY?**

A. In Exhibit Pepco (6F)-20 Witness Blazunas suggests that rates designed with
"incorrect demand" data in Formal Case Nos. 1139 and 1150 resulted in
"potential" BSA revenue under-recoveries totaling roughly \$20.8 million. In
Exhibit Pepco (6F)-21, Witness Blazunas suggests that his design of rates based
on "incorrect" demands would result in future BSA revenue under-recoveries of
\$20.2 million under Pepco's Original MRP or \$18.0 million under Pepco's MRP
Enhanced rates.

**Q. HOW SHOULD THIS COMMISSION ADDRESS THE ESTIMATES OF
"POTENTIAL" BSA REVENUE UNDER-RECOVERIES FOR DEMAND-
METERED NON-RESIDENTIAL RATE CLASSES THAT THE COMPANY
PRESENTS IN EXHIBITS PEPCO (6F)-20 and (6F)-21?**

A. The "potential" under-recovery amounts that Pepco attributes to the use of
incorrect billing demands in Formal Case Nos. 1139 and 1150 should be viewed
as Pepco's responsibility and those amounts should be deducted from the BSA
deferred revenue balances for the affected classes. The "potential" revenue

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1 under-recoveries for future rate years that Witness Blazunas presents in Exhibit
2 Pepco (6F)-21 should simply be ignored by the Commission. The Company's
3 estimates of "potential" future revenue under-recoveries are the result of a
4 change in the Company's demand estimation methods and assumptions used to
5 estimate future demand billing units rather than the "correction" of errors. As a
6 result, those estimates are, at best, **speculative** and warrant no consideration by
7 this Commission in its determination of appropriate rates for Pepco in this
8 proceeding.

9
10 **Q. ON WHAT DO YOU BASE YOUR RECOMMENDATION THAT THE**
11 **COMPANY'S ESTIMATES OF "POTENTIAL" BSA UNDER-RECOVERIES**
12 **ASSOCIATED WITH THE DESIGN OF RATES IN FORMAL CASE NOS. 1139**
13 **AND 1150 SHOULD BE DEDUCTED FROM THE CURRENT BSA DEFERRED**
14 **REVENUE BALANCES FOR THE AFFECTED CLASSES?**

15 A. As a general matter any under-recovery resulting from "errors" in the Company's
16 computation of rates in Formal Case Nos. 1139 and 1150 are **Pepco's**
17 **responsibility** and should not be an added rate burden for its customers. No
18 customer or customer class caused those errors, and no customer or customer
19 class should be required to compensate Pepco for errors and data and/or
20 calculations that were fully within its responsibility and control.

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1 The Company's estimated "potential" revenue under-recoveries attributed
2 to errors in its computation of rates in Formal Case No. 1139 sum to less than
3 \$45,000, and that amount is well within the "noise" of most revenue requirements
4 determinations²¹ and sufficiently small as to be of little relevance. No customer
5 or customer class should be required to compensate Pepco for such estimates of
6 "potential" under-recovery, particularly when the data and calculations that
7 purportedly led to the alleged errors were fully in the control of the Company.

8 The matter of greater dollar significance is the Company's estimated
9 \$20.77 million "potential" under-recovery associated with its design of rates in
10 Formal Case No. 1150. **Exhibit AOBA (5A)-10** provides a comparison of the
11 billing determinants used by Pepco for its demand-metered rate classes in its
12 filed Direct, Supplemental Direct, and Settlement testimonies in Formal Case No.
13 1150. **Exhibit AOBA (5A)-10** demonstrates that the Company used identical
14 billing determinants in its design of rates in each of its filings in Formal Case No.
15 1150 (i.e., its Direct Testimony, Exhibit Pepco (E)-1; its Supplemental Direct
16 Testimony, Exhibit Pepco (2E)-1 and in its Settlement Testimony, Exhibit Pepco
17 (3E)-1) for all demand metered classes **except the GT-LV class**. For the GT-LV

²¹ The Company's estimate of the "potential" BSA revenue under-recovery resulting from its alleged use of incorrect demand data in its design of rates in Formal Case No. 1139 equates to less than 0.025% of the overall revenue requirement for the affected classes. It should also be noted that Exhibit Pepco (6F)-20, page 3 of 6, (not properly labeled, but recognizable as Page 1 of 4 of the Pepco's Attachment to AOBA Data Request 2-10) indicates that the projected under-recovery is not uniformly distributed among the classes shown. As computed by Pepco, the Company's errors potentially resulted in over-recoveries of revenues for the GT-LV and GT-3A classes, while the GSD-LV class had a "potential" under-recovery of nearly \$600,000.

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1 class the Company's Settlement rate design page reflects the same test period
2 actual billing determinants that were presented in its prior rate design exhibits in
3 that proceeding. However, under the heading "Weather Normalized Billing
4 Determinants," significant changes were made to all of the billing determinants
5 used to design rates for the GT-LV class including the annual number of months
6 billed.²²

7 **Exhibit AOBA (5A)-11** highlights the changes in demand billing
8 determinants for the GT-LV class that were introduced in Pepco's Settlement rate
9 design exhibits in Formal Case No. 1150. Although the **actual** billing
10 determinants for the twelve months ended September 2017 remained unchanged
11 in each of the Company's rate design exhibits, the annual number of monthly bills
12 was increased **11.4%**. In addition, the Normal Weather kWh and kW for the
13 class were increased **5.7%**.

14 It is hard to perceive that such significant changes in customer, demand,
15 and kWh billing determinants were made simply by error and that no one at
16 Pepco took note of the significant changes in numbers of customers, kW
17 demands, and kWh used to design the Company's settlement rates and
18 attempted to verify their accuracy. It is also alarming that such changes were not
19 flagged by more senior Pepco personnel prior to the Company's submission of its
20 settlement testimony. Yet, these substantive changes were included in the

²² The number of months billed has not been the subject of weather normalization in past Pepco filings, and Pepco offered no rationale for weather normalization of numbers of bills.

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1 Company's rate Settlement rate design exhibit (i.e., Pepco Exhibit (3E)-1) in
2 Formal Case No. 1150 without any notice to the settling parties and without any
3 identification or explanation of the reasons for such changes in the Company's
4 Settlement Testimony.

5 Regardless of the cause of the "potential" BSA under-recovery that Pepco
6 now estimates, any such under-recovery (actual or "potential") must be attributed
7 exclusively to Pepco. No other party, customer, or customer class had direct
8 influence or control of the data used by Pepco to design its Settlement rates for
9 the GT-LV class. Thus, Pepco must be held accountable and wholly responsible
10 for any revenue impacts resulting from the changes in the billing determinants for
11 the GT-LV class that the Company ultimately used to design its Settlement rates
12 in Formal Case No. 1150.

13
14 **Q. DOES YOUR RECOMMENDATION REGARDING PEPCO'S ESTIMATES OF**
15 **PROSPECTIVE BSA UNDER-RECOVERIES ESTIMATED IN EXHIBIT PEPCO**
16 **(6F)-21 HAVE A SIMILAR BASIS?**

17 A. No. The Company's estimates of "*potential*" BSA under-recoveries in future rate
18 years that are presented in Exhibit Pepco (6F)-21 are not the result of reliance on
19 erroneous data. Rather, the estimates of "potential" BSA under-recoveries
20 during the proposed MRP period represent nothing more than **speculation**. As
21 such those estimates should have no influence on base rate determinations in

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1 this proceeding. Rather, as previously discussed herein, Pepco's suggestion that
2 its pre-Errata demand billing determinants were "*incorrect*" has no basis in fact.
3 The revisions Pepco has made to its projected demand billing determinants for
4 each MRP year are the product of changes in the methods and assumptions
5 Pepco uses to estimate **future** numbers of demand billing units. Further, given
6 that both the Company's original and revised demand billing determinants are
7 nothing more than estimates of unknown future outcomes, they cannot be
8 appropriately characterized at this time as either "*correct*" or "*incorrect*." Only
9 after each projected rate year is completed can the Company, the Commission or
10 any party assess the accuracy of such estimates.

11 However, the expected reliability of the Company's estimates of future
12 demand billing units can only be assessed on the basis of the quality of the
13 analytic support offered for the Company's revised estimates. On that basis the
14 Commission should find Pepco's revised estimates substantially lacking in
15 credibility. As I have previously explained, the load factor relationships on which
16 Pepco has relied to estimate future demand billing units are premised on actual,
17 non-weather-normalized, data for a single year (i.e., calendar year 2018) without
18 any analysis of the extent to which each of the monthly load factor relationships
19 used is reflective of either past usage relationships or expected future relation-
20 ships. Thus, Pepco has failed to provide the Commission any sound basis for

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1 assessing whether the Company's revised billing demand estimates are any
2 more or less reflective of future demand expectations than its original estimates.

3 Again, the **revised** demand billing units that Pepco now presents are
4 simply a reflection of changes in the methods and assumptions that Pepco has
5 chosen to employ to estimate future demand billing units by rate class. At this
6 point in time there are no "*correct*" or "*incorrect*" estimates of either future billing
7 demands and no "*correct*" or "*incorrect*" estimates of future BSA revenue under-
8 recoveries. Any claims to the contrary are unfounded, and thus, Pepco has
9 further wasted the time and resources of the Commission, OPC, and other
10 parties by making an unnecessary, inappropriate and unjustified eleventh-hour
11 Errata filing.

12
13 **Q. DO YOU OFFER ANY OTHER OBSERVATIONS REGARDING THE ESTI-**
14 **MATES OF "POTENTIAL" REVENUE UNDER-RECOVERIES THAT WITNESS**
15 **BLAZUNAS PRESENTS IN EXHIBIT PEPKO (6F)-21?**

16 A. Yes. The estimates of future demand billing units that the Company uses in the
17 preparation of Exhibit Pepco (6F)-21 represent only one of many factors that will
18 ultimately determine the levels of revenue over-recovery or under-recovery that
19 Pepco will experience. Moreover, the cumulative under-recoveries that Pepco
20 estimates (i.e., \$21.18 million under its Original MRP proposal and \$18.01 million
21 under the Company's Enhanced MRP proposal) for the three rate years

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1 addressed by the Company's MRP proposals are small in comparison to the
2 actual BSA under-recoveries Pepco has reported for the months since the start
3 of Covid-19 restrictions. For just the five-month period from April through August
4 2020, the Company's BSA under-recoveries from its demand-metered non-
5 residential classes total to over **\$33.3 million**.²³

6
7 **Q. ARE THERE ANY ADDITIONAL BSA-RELATED MATTERS THAT THE**
8 **COMMISSION SHOULD ADDRESS IN ITS EVALUATION OF PEPCO'S**
9 **FILINGS IN THIS PROCEEDING?**

10 A. Yes. In the Settlement approved by the Commission in Formal Case No. 1150,
11 Pepco committed that it would "... *work with AOBA, OPC, and other interested*
12 *parties to further address in Pepco's next base rate case the BSA structural*
13 *deficiencies identified by the Commission in Order No. 18846.*"²⁴ However,
14 Pepco has done nothing to address structural deficiencies within the Company's
15 BSA mechanism since the settlement agreement in Formal Case No. 1150. With
16 the impacts of the Covid-19 pandemic and the further changes in the Company's
17 proposed rates for demand metered rate classes included in Pepco's Errata filing
18 existing structural deficiencies in the Company's BSA are further highlighted.

²³ The period April through August was used to represent the impacts of Covid19 on Pepco's revenue recoveries as April was the first full month of Covid-19 impacts and August is the most recent month for which actual BSA recoveries are known at this time. Arguably, the month of March 2020 could also be included. The Company's revenue under-recoveries for its demand-metered non-residential classes for March 2020 through August 2020 total \$36.2 million. See **Exhibit AOBA (5A)-12**.

²⁴ Formal Case Nos. 1150 and 1151, Joint Exhibit 1, page 16 of 228, paragraph 16.

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1 In his Direct Testimony in this proceeding, Pepco Witness Blazunas
2 indicates Pepco projected that the deferral balance for the MGT-LV class would
3 go to zero by July 2020 and the deferral balance for the GT-LV class would go to
4 zero by April 2021. Instead, the deferral balances for both classes have
5 continued to grow. As shown in Table 1, the deferred revenue balance for the
6 MGT-LV class had been reduced slightly (i.e., by less than \$540,000) over the
7 ten month period between April 2019 and February 2020.²⁵ But, at that rate
8 reduction in the deferred revenue balance for the MGT-LV class, Pepco would
9 have required approximately another **14.5 years** to achieve a zero balance.
10 Moreover, the BSA deferred revenue balance for the GT-LV class **more than**
11 **doubled** between April 2019 and February 2020, showing no hope for achieving
12 a zero deferred revenue balance for that class at any time in the foreseeable
13 future. Since the start of the period impacted by the Covid-19 pandemic in March
14 2020, the BSA revenue deferral balances for the MGT-LV and GT-LV classes
15 have grown by nearly **\$20 million** (i.e., by more than the total deferred balance
16 for those classes in April 2019). Pepco's myopic assessment of when zero
17 deferred balances for those classes would be achieved needs to be re-evaluated:

²⁵ The Company's April 2019 BSA deferred revenue balances represent the most recent information available at the time Pepco submitted its Direct Testimony in this proceeding. February 2020 represents the last month before the start of governmentally imposed Covid-19 restrictions.

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Table 1

Pepco DC BSA Deferred Revenue Balances

	MGT-LV	GT-LV	Total
April 2019	\$ 9,898,179.70	\$ 7,159,927.30	\$17,058,107.00
February 2020	\$ 9,360,414.20	\$14,657,465.73	\$24,017,879.93
July 2020 ²⁶	\$13,298,874.76	\$22,921,717.26	\$36,220,592.02
August 2020 ²⁷	\$17,019,528.24	\$26,973,817.86	\$43,993,346.10

G. Broader Implications of Pepco's Errata Filing

Q. DOES PEPCO'S ERRATA FILING UNDERMINE PEPCO'S ARGUMENT THAT ITS MRP PROPOSALS, IF ADOPTED, WILL YIELD REDUCED REGULATORY COSTS?

A. Most definitely. Even if we ignore all costs incurred prior to the Commission's December 20, 2019, Order No. 20273, this has been a very expensive case to litigate for AOBA and I suspect for all parties. This testimony represents the fifth testimony I have filed in this proceeding, where in a normal rate case I would expect to file two or three pieces of testimony. Moreover, this proceeding has provided no foundation for a finding that future MRP proceedings would be substantially less complex and less costly. To the contrary, the problems Pepco

²⁶ July 2020 is the month in which the Company projected that the BSA deferred revenue balance for the MGT-LV class would "go to zero."

²⁷ The most recent month for which BSA deferred balances are presently available.

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1 has discussed in this proceeding with respect to the billing determinants used by
2 the Company in designing rates, both in this case and in prior cases (i.e., Formal
3 Case Nos. 1139 and 1150) do not generate confidence in the accuracy and
4 reliability of the data the Company's has employed. Reliance on forecasted data
5 is often difficult, but the problems associated with forecasted information are
6 amplified when the Company makes substantive changes to forecasted data in
7 the middle of a proceeding.

8 In addition, there is clearly no consensus with respect to many elements of
9 the Company's requests in this proceeding, particularly Pepco's PIM proposals.
10 Thus, it is likely that further litigation of PIMs will be necessary in future
11 proceedings. Furthermore, it appears that Pepco's next base rate proceeding
12 will necessarily include substantial discussion of Covid-19 impacts on the
13 Company's costs of providing service. That discussion will likely produce
14 considerable debate regarding: (1) the magnitude and appropriate ratemaking
15 treatment of Commission authorized cost deferrals during the period of govern-
16 mentally mandated Covid-19 restrictions; and (2) the manner in which the
17 Company's forecasted service requirements, construction budget, and operating
18 expenses will be affected on a going-forward basis.

19 At this point, it appears that regardless of whether a MRP is approved, in
20 this proceeding, we can expect another (base rate/MRP filing in early 2022 for
21 rates to be effective in 2023 and beyond, as well as a "*final reconciliation and*

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1 *prudence review*” proceeding in 2023. If a MRP is approved and Pepco is
2 allowed to annually adjust its billing determinants and rates, a rigorous review
3 process for any such changes will be essential to ensure that further errors or
4 manipulations of data are not overlooked.

5 This does not sound like a structure that yields significant regulatory cost
6 savings. In essence, the Company’s proposals will require at least **two** major
7 proceedings every three years as well as intensive annual reviews of Pepco
8 changes to billing determinants and rates. For these reasons, I find no sub-
9 stantive basis for concluding that the Company’s multi-year rate plan proposals
10 will do anything to reduce the regulatory cost burdens borne by District rate-
11 payers. Rather, the complexities of multi-year rate filings, with or without PIMs or
12 PBRs, will continue to render an MRP a more costly approach to ratemaking than
13 traditional base rate cases based on historic test year data.

14
15 **H. Pepco’s October 6, 2020 Data Request Responses**

16
17 **Q. WHAT OBSERVATIONS SHOULD BE MADE FROM PEPCO’S RESPONSE**
18 **TO AOBA DATA REQUEST 9-2?**

19 A. First the Company’s response to part (a) of AOBA Data Request 9-2 identifies a
20 person outside of Pepco who was responsible for notifying Pepco Witness
21 Blazunas of potential issues with respect to the billing determinants Pepco used

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1 in its development of its rate design proposals in this case. It also indicates that
2 the problem was identified in February 2020 (no specific data identified) which
3 was at least a week (and maybe longer) before OPC and intervenors were
4 scheduled to file their direct testimonies in this proceeding. Yet, Pepco provided
5 no notice of this potential issue to the parties, and filed no Errata to the
6 Company's previously filed testimony and exhibits. Instead, Pepco elected to
7 wait until its rebuttal testimony (i.e., after other parties had filed their direct
8 testimony) to offer any disclosure of a billing determinants problem.

9 Second, Pepco's response to part (b) of AOBA Data Request 9-2 offers no
10 insight regarding how a person outside of Pepco came to identify a billing
11 determinants problem within Pepco's data. Part (b) of AOBA Data Request 2-9
12 specifically asked the Company to document and explain the data and analyses
13 the person outside of Pepco used to assess the existence of a potential problem.
14 However, Pepco's response provides neither documentation nor an explanation.
15 Instead, the Company indicates, "The requested data/analysis does not exist."
16 Implicitly, the Commission and the parties are asked to accept that the Manager
17 of Rate Administration for ACE and Delmarva intuitively discerned a problem that
18 Pepco's own Manager of Rate Administration (who presumably would be more
19 familiar with Pepco data) had not identified.

20 Third, Pepco's response to part (c) of AOBA Data Request 2-9 purports to
21 provide the numerical analysis on which the Company relied to verify the need

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1 for a correction to the billing determinants used in the Company's May 30, 2019
2 Direct Testimony and Exhibits. However, the information presented in the
3 Attachment to AOBA Data Request 9-2 reflects a comparison of (a) the Com-
4 pany's July 2020 load factor based revisions to its estimated billing demands
5 (which I have previously discussed herein) and (b) the billing demand units used
6 in the rate designs presented in the Company's Direct Testimony. The purported
7 "corrections" or "updates" made in the Company's April 8, 2020 Rebuttal
8 Testimony, that were understood to be the result of the verification of a problem
9 identified by a person outside of Pepco, are not shown.

10 Fourth, Pepco's response to part (d) of AOBA Data Request 9-2 suggests
11 that the Company did not file an errata to its May 30, 2019 testimony when it
12 verified a problem in the billing determinants used in that testimony, and elected
13 instead to tread the correction in the same manner that it would treat an "update"
14 to its revenue requirements. However, there is a substantive difference between
15 an "update" and a "correction." Moreover, Witness Blazunas' April 8, 2020
16 Rebuttal Testimony never mentions a correction of erroneous data. Rather,
17 Witness Blazunas' Rebuttal Testimony simply indicates that his Rebuttal TTPCF
18 rate designs use "**updated** billing demand determinants for commercial
19 schedules that have demand rate components."²⁸ (Emphasis added.) This can

²⁸ Exhibit Pepco (4F), the Rebuttal Testimony of Witness Blazunas, page 27, lines 18-23.

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1 only be perceived as a less than forthright representation of the problem ident-
2 ified by a person working for a Pepco affiliate two months earlier.

3
4 **Q. THE REBUTTAL TESTIMONIES OF PEPSCO WITNESS WOLVERTON AND**
5 **BLAZUNAS ALSO REFERENCE ADJUSTMENTS TO “SYNCHRONIZE**
6 **BILLING DETERMINANTS” FOR THE MGT-LV AND GT-LV RATE CLASSES.**
7 **HOW DO THOSE ADJUSTMENTS RELATE TO THE BILLING DETER-**
8 **MINANTS PROBLEMS THAT WERE IDENTIFIED IN FEBRUARY 2020?**

9 A. Although both sets of adjustments or corrections affect primarily the GT-LV and
10 MGT-LV rate classes. The relationship between the two has not been clearly
11 explained. On one hand we are told that the problem identified in February 2020
12 affects only the TTPCF billing determinants. On the other hand, the Company
13 represents that adjustment of its MRP billing determinants is necessary to
14 “synchronize” the forecasted data used in Pepco’s revenue requirements and
15 rate design presentations. If prior actual billing determinants were incorrectly
16 computed, the Commission should expect that correction of such computations
17 would also affect the historic data from which forecasted billing determinants
18 were derived. No explicit recognition of such a relationship is discussed by
19 Pepco’s witnesses.

20 It is also important to note that the Company offers no explanation of how
21 its Rebuttal adjustments to TTPCF and MRP billing determinants relate to, or

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1 reconcile with, the Company's subsequent load-factor based adjustments to
2 demand billing determinants for the GT-LV and MGT-LV classes and for other
3 demand-metered classes.

4
5 **Q. AOBA DATA REQUEST 9-7 OF PEPSCO ASKED THE COMPANY TO**
6 **DOCUMENT AND EXPLAIN THE ALLEGED DOUBLE COUNTING OF**
7 **ACTGUAL KW DEMANDS THAT WAS USED TO COMPUTE THE COM-**
8 **PANY'S SETTLEMENT RATES FOR FORMAL CASE NO. 1150. DID PEPSCO**
9 **PROVIDE THE REQUESTED EXPLANATION?**

10 A. No. Pepco's response to AOBA Data Request 9-7 simply references its
11 response to OPC Data Request 61-4. Pepco's response to OPC Data Request
12 61-4 provides a twelve page numerical attachment (one page for each month of
13 calendar year 2018), but it also offers **no explanation** of the data and analyses
14 contained therein. This is troublesome due to the fact that the data for several
15 months include negative demand entries without any discussion of the amounts,
16 how they were derived, or what they represent. Customers do not typically have
17 negative demands. Negative demands are at times the result of billing
18 adjustments or adjustments made by the Company to remove the effects of
19 billings that are rendered for more than one month. But, when bills are adjusted
20 for billing errors, the adjustments often yield changes in both kW and kWh.
21 Likewise, adjustments made for the billing of two or more months of usage in a

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1 single month typically affects both kWh and kW demand billing units for both the
2 month in which the usage was billed and the other billing month(s) for which
3 usage was included in the bill rendered. Yet, none of the negative kW demand
4 measures shown are associated with changes in billed kWh.

5
6 **Q. PEPCO'S RESPONSE TO STAFF DATA REQUEST 26-3 SUGGESTS THAT**
7 **THE COMPANY'S ALLOCATION OF ERR CREDITS TO CERTAIN CLASSES**
8 **THAT EXCEEDED THE CLASSES' ANNUAL REVENUE REQUIREMENTS**
9 **REFLECTED PEPCO'S EFFORT TO MAXIMIZE VALUE TO CUSTOMERS.**
10 **SHOULD THE COMMISSION ACCEPT THAT REPRESENTATION?**

11 **A.** No. It is clear that there must be problems in the Company's allocation of ERR
12 credits. It is difficult to believe that the proposed credits for any rate class, if
13 properly allocated, would more than offset the class's entire annual revenue
14 requirement in Rate Year 3 unless there was a error in the Company's allocation
15 of those credits among rate classes. Exhibit Pepco (6F)-22, page 341 of 344
16 shows the Company's allocation of Rate Offsets, including ERR Credits among
17 classes. Footnote " *** " at the bottom of that page indicates the Company
18 allocates the benefits derived from EDIT acceleration on the basis of cumulative
19 EDIT credits paid as of 12/31/2019. Yet, the Company's 2022 distribution of
20 EDIT Acceleration amounts is not proportional to its distribution by class of EDIT
21 Acceleration benefits for 2020.

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1 To illustrate this point, it can be observed that in 2021 the Company
2 proposes to distribute \$0.3 million of accelerated EDIT benefit to the MMA class
3 out of a total 2021 benefit for all classes of \$69.8 million. Thus, **in 2021** the MMA
4 class would receive **only 0.43%** of the total accelerated EDIT benefit for that
5 year. By contrast, in 2022 the MMA class is allocated \$4.0 million of accelerated
6 EDIT benefit while the aggregate accelerated EDIT benefit for all classes is only
7 \$23.2 million. Thus, in 2022 the MMA class would be allocated **17.24%** of the
8 total accelerated EDIT benefit.

9 I also note that Pepco claims its Errata filing has no impact on the
10 Company's class cost of service study.²⁹ However, for unexplained reasons
11 Exhibit Pepco (6F)-22, page 341 of 344 reflects, reductions in accelerated EDIT
12 benefits for the MGT-LV and GT-LV classes from the levels shown in Witness
13 Blazunas' Surrebuttal, Exhibit Pepco (5F)-18, page 1 of 1. Yet, the amounts
14 allocated to other classes remain unchanged.

15
16 **Q. DO YOU HAVE ANY COMMENTS REGARDING PEPCO'S RESPONSE TO**
17 **STAFF DATA REQUEST 26-8?**

18 A. Yes. Pepco's response to that request does little to inspire confidence in the
19 Company's internal review processes for its rate structure filings. The review
20 process discussed in the Company's response appears to be limited to the same

²⁹ See Exhibit Pepco (3E), the July 31, 2020 Third Supplemental Testimony of Pepco Witness Schafer.

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1 group of individuals that did not catch errors in the Company's previous rate
2 filings. Further, Pepco's response provides no compelling reason for the
3 Commission to now place greater confidence in the Company's work. The on-
4 going nature of these problems is underscored by the fact that Pepco's July 2020
5 Errata revisions to demand billing determinants were only made after Staff DR
6 24-24 was submitted as a follow-up to Staff DR 19-6, and the Staff specifically
7 inquired about the accuracy of the data Pepco had used in the earlier response.
8 Thus, again, the identification of a potential problem by someone outside of
9 Pepco was required before Pepco assessed there might be the need for
10 revisions to its previously filed billing determinants and rates.

11
12 **Q. SHOULD THE COMMISSION ACCEPT PEPCO'S RESPONSE TO STAFF**
13 **DATA REQUEST 26-13 AS PRESENTED?**

14 A. No. Pepco represents that, if the Company is granted a change in revenue
15 requirements, Pepco will ensure the compliance rates are accurate by: (1)
16 providing it rate design workpapers in Excel format; and (2) calculating distribu-
17 tion revenues using "***approved distribution rates***" and "***actual billing deter-***
18 ***minants.***" However, "approved distribution rates" are the product of a compli-
19 ance rate design. They are not an input to that process. The inputs to the
20 process are an approved overall revenue requirement for the Company, and
21 Commission guidance regarding the manner in which revenues requirements

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1 should be distributed among rate classes and/or guidance regarding the manner
2 in which certain charges (e.g., monthly customer charges) should be determined.
3 **“Approved distribution rates”** only result from the Commission’s acceptance of
4 compliance rate designs. Further, for the Company’s projected MRP rate years,
5 there are no **“actual billing determinants.”** Thus, the calculation that Pepco
6 suggests has no applicability to an MRP rate scenario.

7
8 **Q. DO YOU FIND PEPKO’S SUPPLEMENTAL RESPONSE TO OPC DATA**
9 **REQUEST 61-16 PARTICULARLY RELEVANT TO ISSUES BEFORE THE**
10 **COMMISSION IN THIS PROCEEDING?**

11 A. Yes, I do. In my March 8, 2020 Direct Testimony in this proceeding, I raised
12 concerns regarding the structure of Pepco’s BSA mechanism and about factors
13 contributing to growing deferred revenue balances, particularly for the GT-LV and
14 MGT-LV classes. In my June 1, 2020 Surrebuttal Testimony, I further expounded
15 on concerns relating to the operation of Pepco’s BSA and observed that Pepco’s
16 Annual BSA reports failed to explain roughly 90% of the causes of substantial
17 revenue under recoveries for the GT-LV and MGT-LV classes. Pepco’s
18 Supplemental Response OPC 61-16 further confirms that Pepco has **no handle**
19 on the causes of its growing revenue under-recovery balances for its demand-
20 metered rate classifications. As Pepco states in that response, *“The Company*

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1 *has not done any audit or investigation related to its BSA deferral balances of*
2 *commercial classes with demand rate components.”*

IV. CONCLUSION

6 **Q. DO YOU OFFER ANY CONCLUDING COMMENTS?**

7 A. Yes, I do. Pepco has attempted to deceive the Commission and District
8 ratepayers into believing that they would see no rate increases before January 1,
9 2022. This testimony provides further demonstration of the misleading nature of
10 the Company’s representations. Further, Pepco’s bill comparisons have been
11 manipulated to show no increases in individual customer bills when that clearly
12 will not be the case if either Pepco’s MRP proposal or MRP Enhanced proposal
13 is approved. The consistent theme throughout the details of Pepco’s rate
14 structure presentation is that the Company is more focused on ensuring its own
15 revenue recovery than on fair and equitable treatment of its customers.

16 Our ability to rely on Pepco’s forecasts of costs and service requirements
17 has been problematic throughout this proceeding. The Covid-19 pandemic
18 emphasizes and underscores the futility of such efforts. It also emphasizes the
19 importance of problems associated with the Company’s ability to forecast the
20 future determinants of reasonable and appropriate rates. Until the longer-term
21 impacts of the Covid-19 pandemic are better understood, this Commission

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1 should refrain from venturing into a new ratemaking paradigm that is wholly
2 dependent upon forecasted data.

3 As presented, Pepco's Revised MRP Enhanced rate proposals will still
4 result in large rate increases in Rate Year 3 charges for most Pepco customers
5 in the District. Despite the difficult times faced by its customers of all sizes,
6 Pepco has done little to actually belt-tighten and trim projected expenses.
7 Moreover, even if Pepco makes no further rate increase requests during the
8 pendency of the Company's MPR period, District ratepayers will see further
9 significant rate increases when the Company ERR Rider Credits (only applicable
10 in Rate Year 3) expire. Further, the post-initial MRP rate increases for District
11 ratepayers will be amplified by (a) deferred Covid-19 expenses; (b) the loss of
12 accelerated tax credits, (c) the end of the Company's proposed pause in
13 regulatory asset amortizations; (d) further increases in Pepco's on-going capital;
14 and operating costs and (e) large Covid-19 BSA deferred revenue balances.

15 Importantly, the errors in Pepco's rate designs in prior cases, coupled with
16 its multiple corrections to billing determinants in this case, severely erode the
17 confidence that the Commission and other parties can place in the
18 reasonableness of Pepco's filed rate proposals. That is a particular concern
19 where the Company is seeking to establish rates for multiple future years on the
20 basis of estimates of questionable quality and reliability. In this regard, Pepco
21 management of its data and analyses in this case and recent prior cases must be

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1 seen as a major obstacle to this Commission's approval of a multi-year rate plan
2 for the Company.

3 Further, Pepco's MRP proposals in this proceeding (original and
4 enhanced) are conceptually inconsistent with the continuation of the Company's
5 BSA mechanism. The **after-the-fact** reconciliations of revenues required by the
6 BSA are not meaningful in the context of authorized revenue per customer
7 amounts that are based on **projected** numbers of customers. If projected
8 numbers of customers and revenue per customer amounts are the only basis for
9 revenue reconciliation, the ratemaking process loses all grounding in reality. In
10 addition, Pepco's request for authority to adjust its billing determinants and rates
11 annually on a going forward basis outside of fully litigated rate proceedings
12 would, if approved, simply add to the untethered nature of subsequent rate
13 reconciliation efforts. The Commission must recognize that, in essence, Pepco's
14 request for annual adjustment of its base rate charges before the start of each
15 rate year represents nothing more than Pepco's lack of confidence in its own
16 ability to forecast with reasonable accuracy.

17 On the basis of the presentations herein, the Commission should conclude
18 that the Company's Errata filing and its July 31, 2020 Supplemental Testimony
19 were unnecessary and have resulted in a substantial waste of time and
20 resources for all concerned. They do not reflect the Company's correction of any
21 erroneous information. Rather, the revisions to billing determinants that Pepco

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1 now proposes constitute changes in methodology and assumptions. On that
2 basis, the Commission should reject the changes presented in Pepco's July 28,
3 2020 Errata filing and the related July 31, 2020 Supplemental Testimony.
4 However, in doing so, the Commission should explicitly note the lack of confi-
5 dence that must be associated with the billing determinants data and analyses
6 that Pepco has used in its rate filings in this case, as well as in other recent
7 cases. The difficulties engendered by Pepco's own actions severely undermine
8 the ability of this Commission and District ratepayers to place confidence in the
9 necessary underpinnings for Commission adoption of either of Pepco's multi-year
10 rate plan proposals in this proceeding. The Commission's must also recognize
11 that approval of new rates at this time based on pre-Covid-19 cost estimates will
12 serve to greatly complicate efforts to identify appropriate Covid-19 cost deferrals.

13 Finally, the Commission should be deeply troubled by the Company's
14 representations in this proceeding regarding errors in its compliance rate
15 determinations in prior cases (i.e., Formal Case Nos. 1139 and 1150). Whether
16 those errors were intentional or inadvertent is irrelevant. Pepco was wholly
17 responsible for those errors and must be held accountable for the problems
18 those errors have created. No experienced analyst or informed reviewer within
19 the Company should have allowed the use of those significantly altered data in
20 Formal Case No. 1150 without raising questions regarding the origin and
21 appropriateness of the changes made. Moreover, the fact that Pepco made

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1 those changes without informing the Settling parties and without identifying or
2 explaining those significant changes in its Settlement testimony is particularly
3 troublesome. For these reasons, the only fair and equitable treatment of revenue
4 under-recoveries resulting from Pepco's errors is for Pepco to be required to
5 deduct its estimates of BSA revenue under-recoveries attributable to its design of
6 Settlement rates for Formal Case No. 1150 from the current BSA deferred
7 revenue balances for each of the affected demand-metered rate classes.

8
9 **Q. DOES THIS CONCLUDE YOUR SECOND SUPPLEMENTAL TESTIMONY?**

10 **A.** Yes, it does.

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA**

IN THE MATTER OF

**THE APPLICATION OF
POTOMAC ELECTRIC POWER COMPANY
FOR AUTHORITY TO IMPLEMENT A
MULTI-YEAR RATE PLAN FOR
ELECTRIC DISTRIBUTION SERVICE
IN THE DISTRICT OF COLUMBIA**

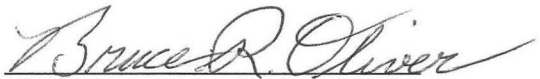
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FORMAL CASE NO. 1156

DECLARATION OF BRUCE R. OLIVER

I, Bruce R. Oliver, do hereby declare under the penalty of perjury that I am authorized to make this Declaration on behalf of the Apartment and Office Building Association of Metropolitan Washington; that the foregoing testimony and exhibits were prepared by me or under my direction and supervision; and that the contents therein are true and correct to the best of my knowledge, information and belief.

Dated:
October 9, 2020

/s/ 
Bruce R. Oliver

Potomac Electric Power Company

DC PSC Formal Case No. 1156

District of Columbia Demand Billing Determinants and Load Factors

	FC 1076 1/ Actual TME 12-31-08	FC 1087 Actual TME 3-31-11	FC 1103 Actual TME 12-31-12	FC 1139 - Pepco Direct Actual TME 3-31-16	Weather Normal TME 3-31-16
GSD- LV					
Monthly Bills	66,106	64,736	65,886	64,758	64,758
Summer kWh	312,369,561	320,888,046	294,449,027	293,237,676	277,057,380
Summer kW Demand	310,981	705,774	641,923	755,948	755,948
kWh per Billing KW	1,004.47	454.66	458.70	387.91	366.50
Implied Load Factor	137.60%	62.28%	62.84%	53.14%	50.21%
Winter kWh	404,126,658	366,410,803	333,159,397	342,503,903	334,485,107
Winter kW Demand	398,674	850,062	773,999	1,256,181	1,256,181
kWh per Billing KW	1,013.68	431.04	430.44	272.65	266.27
Implied Load Factor	138.86%	59.05%	58.96%	37.35%	36.48%
Annual kWh	716,496,219	687,298,849	627,608,424	635,741,579	611,542,487
Annual kW Demand	709,655	1,555,836	1,415,922	2,012,129	2,012,129
kWh per Billing KW	1,009.64	441.76	443.25	315.95	303.93
Implied Load Factor	138.31%	60.51%	60.72%	43.28%	41.63%
GSD-3A					
Monthly Bills	83	84	70	84	84
Summer kWh	696,490	755,270	816,850	854,223	826,057
Summer kW Demand	856	1,340	1,440	1,620	1,620
kWh per Billing KW	814.04	563.55	567.18	527.30	509.91
Implied Load Factor	111.51%	77.20%	77.70%	72.23%	69.85%
				1.097	
Winter kWh	660,070	760,830	835,798	917,288	931,928
Winter kW Demand	899	1,707	1,679	2,129	2,129
kWh per Billing KW	734.15	445.66	497.91	430.85	437.73
Implied Load Factor	100.57%	61.05%	68.21%	59.02%	59.96%
Annual kWh	1,356,560	1,516,100	1,652,648	1,771,511	1,757,985
Annual kW Demand	1,755	3,047	3,119	3,749	3,749
kWh per Billing KW	773.10	497.51	529.90	472.53	468.92
Implied Load Factor	105.90%	68.15%	72.59%	64.73%	64.24%

1/ In FC 1076 billing demands were only recorded when in excess of 25 kW for GS classes.

Potomac Electric Power Company

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District of Columbia Demand Billing Determinants and Load Factors

	FC 1150 - Pepco Direct		FC 1150 - Pepco Supplemental		FC 1150 - Pepco Settlement	
	Weather		Weather		Weather	
	Actual <i>TME 9-30-17</i>	Normal <i>TME 9-30-17</i>	Actual <i>TME 9-30-17</i>	Normal <i>TME 9-30-17</i>	Actual <i>TME 9-30-17</i>	Normal <i>TME 9-30-17</i>
GSD- LV						
Monthly Bills	61,205	61,205	61,205	61,205	61,205	61,205
Summer kWh	282,841,856	281,887,701	282,841,856	281,887,701	282,841,856	281,887,701
Summer kW Demand	917,178	917,178	917,178	917,178	917,178	917,178
kWh per Billing KW	308.38	307.34	308.38	307.34	308.38	307.34
Implied Load Factor	42.24%	42.10%	42.24%	42.10%	42.24%	42.10%
Winter kWh	349,487,410	356,314,370	349,487,410	356,314,370	349,487,410	356,314,370
Winter kW Demand	1,103,219	1,103,219	1,103,219	1,103,219	1,103,219	1,103,219
kWh per Billing KW	316.79	322.98	316.79	322.98	316.79	322.98
Implied Load Factor	43.40%	44.24%	43.40%	44.24%	43.40%	44.24%
Annual kWh	632,329,266	638,202,071	632,329,266	638,202,071	632,329,266	638,202,071
Annual kW Demand	2,020,397	2,020,397	2,020,397	2,020,397	2,020,397	2,020,397
kWh per Billing KW	312.97	315.88	312.97	315.88	312.97	315.88
Implied Load Factor	42.87%	43.27%	42.87%	43.27%	42.87%	43.27%
GSD-3A						
Monthly Bills	80	80	80	80	80	80
Summer kWh	663,154	661,175	663,154	661,172	663,154	661,172
Summer kW Demand	1,501	1,501	1,501	1,501	1,501	1,501
kWh per Billing KW	441.81	440.49	441.81	440.49	441.81	440.49
Implied Load Factor	60.52%	60.34%	60.52%	60.34%	60.52%	60.34%
Winter kWh	905,230	923,070	905,230	923,070	905,230	923,070
Winter kW Demand	2,095	2,095	2,095	2,095	2,095	2,095
kWh per Billing KW	432.09	440.61	432.09	440.61	432.09	440.61
Implied Load Factor	59.19%	60.36%	59.19%	60.36%	59.19%	60.36%
Annual kWh	1,568,384	1,584,245	1,568,384	1,584,242	1,568,384	1,584,242
Annual kW Demand	3,596	3,596	3,596	3,596	3,596	3,596
kWh per Billing KW	436.15	440.56	436.15	440.56	436.15	440.56
Implied Load Factor	59.75%	60.35%	59.75%	60.35%	59.75%	60.35%

Potomac Electric Power Company

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District of Columbia Demand Billing Determinants and Load Factors

FC 1156: Original Filing (F)-6					
	Actual	Weather	Projected	Projected	Projected
	TME 12-31-18	Normal	RY 1: 2020	RY 2: 2021	RY 3: 2022
	TME 12-31-18	TME 12-31-18			
GSD- LV					
Monthly Bills	61,276	61,276	60,988	61,054	61,130
Summer kWh	283,446,851	275,146,776	271,834,969	267,309,844	263,367,302
Summer kW Demand	945,037	945,037	920,462	905,372	892,358
kWh per Billing KW	299.93	291.15	295.32	295.25	295.14
Implied Load Factor	41.09%	39.88%	40.46%	40.45%	40.43%
			0.999	0.985	
Winter kWh	345,267,257	341,964,081	341,588,857	336,421,450	331,512,239
Winter kW Demand	1,064,387	1,064,387	1,056,943	1,041,003	1,025,936
kWh per Billing KW	324.38	321.28	323.19	323.17	323.13
Implied Load Factor	44.44%	44.01%	44.27%	44.27%	44.26%
Annual kWh	628,714,108	617,110,857	613,423,826	603,731,294	594,879,541
Annual kW Demand	2,009,424	2,009,424	1,977,405	1,946,375	1,918,294
kWh per Billing KW	312.88	307.11	310.22	310.18	310.11
Implied Load Factor	42.86%	42.07%	42.50%	42.49%	42.48%
GSD-3A					
Monthly Bills	65	65	60	60	60
Summer kWh	551,065	534,853	556,705	547,438	539,363
Summer kW Demand	1,216	1,216	1,265	1,245	1,227
kWh per Billing KW	453.18	439.85	440.08	439.71	439.58
Implied Load Factor	62.08%	60.25%	60.29%	60.23%	60.22%
				0.985	
Winter kWh	609,202	602,241	699,557	688,975	678,921
Winter kW Demand	1,367	1,367	1,572	1,548	1,525
kWh per Billing KW	445.65	440.56	445.01	445.07	445.19
Implied Load Factor	61.05%	60.35%	60.96%	60.97%	60.99%
Annual kWh	1,160,267	1,137,094	1,256,262	1,236,413	1,218,284
Annual kW Demand	2,583	2,583	2,837	2,793	2,752
kWh per Billing KW	449.19	440.22	442.81	442.68	442.69
Implied Load Factor	61.53%	60.30%	60.66%	60.64%	60.64%

Potomac Electric Power Company

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District of Columbia Demand Billing Determinants and Load Factors

	FC 1156: Rebuttal Filing (4F)-6					FC 1156: Rebuttal REVISED - Revised (4F)-6		
	Actual <i>TME 12-31-18</i>	Weather Normal <i>TME 12-31-18</i>	Projected RY 1: 2020	Projected RY 2: 2021	Projected RY 3: 2022	Projected RY 1: 2020	Projected RY 2: 2021	Projected RY 3: 2022
GSD- LV								
Monthly Bills	61,276	61,276	60,988	61,054	61,130	60,988	61,054	61,130
Summer kWh	283,446,851	275,146,776	271,834,969	267,309,844	263,367,302	271,834,969	267,309,844	263,367,302
Summer kW Demand	790,522	790,522	920,462	905,372	892,358	758,985	746,300	735,272
kWh per Billing KW	358.56	348.06	295.32	295.25	295.14	358.16	358.18	358.19
Implied Load Factor	49.12%	47.68%	40.46%	40.45%	40.43%	49.06%	49.07%	49.07%
Winter kWh	345,267,257	341,964,081	341,588,857	336,421,450	331,512,239	341,588,857	336,421,450	331,512,239
Winter kW Demand	1,064,900	1,064,900	1,056,943	1,041,003	1,025,936	1,057,452	1,041,506	1,026,434
kWh per Billing KW	324.23	321.12	323.19	323.17	323.13	323.03	323.01	322.97
Implied Load Factor	44.41%	43.99%	44.27%	44.27%	44.26%	44.25%	44.25%	44.24%
Annual kWh	628,714,108	617,110,857	613,423,826	603,731,294	594,879,541	613,423,826	603,731,294	594,879,541
Annual kW Demand	1,855,422	1,855,422	1,977,405	1,946,375	1,918,294	1,816,437	1,787,806	1,761,706
kWh per Billing KW	338.85	332.60	310.22	310.18	310.11	337.71	337.69	337.67
Implied Load Factor	46.42%	45.56%	42.50%	42.49%	42.48%	46.26%	46.26%	46.26%
GSD-3A								
Monthly Bills	65	65	60	60	60	60	60	60
Summer kWh	551,065	534,853	556,705	547,438	539,363	556,705	547,438	539,363
Summer kW Demand	1,050	1,050	1,265	1,245	1,227	1,056	1,038	1,023
kWh per Billing KW	524.82	509.38	440.08	439.71	439.58	527.18	527.40	527.24
Implied Load Factor	71.89%	69.78%	60.29%	60.23%	60.22%	72.22%	72.25%	72.22%
Winter kWh	609,202	602,241	699,557	688,975	678,921	699,557	688,975	678,921
Winter kW Demand	1,365	1,365	1,572	1,548	1,525	1,570	1,546	1,523
kWh per Billing KW	446.30	441.20	445.01	445.07	445.19	445.58	445.65	445.78
Implied Load Factor	61.14%	60.44%	60.96%	60.97%	60.99%	61.04%	61.05%	61.07%
Annual kWh	1,160,267	1,137,094	1,256,262	1,236,413	1,218,284	1,256,262	1,236,413	1,218,284
Annual kW Demand	2,415	2,415	2,837	2,793	2,752	2,626	2,584	2,546
kWh per Billing KW	480.44	470.85	442.81	442.68	442.69	478.39	478.49	478.51
Implied Load Factor	65.81%	64.50%	60.66%	60.64%	60.64%	65.53%	65.55%	65.55%

Potomac Electric Power Company

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District of Columbia Demand Billing Determinants and Load Factors

	FC 1156: Surrebuttal Filing: Enhanced MRP			FC 1156: Errata - Supplemental Surrebuttal Filing: Enhanced MRP (5F)-6 Revised				
	Projected RY 1: 2020	Projected RY 2: 2021	Projected RY 3: 2022	Actual TME 12-31-18	Weather Normal TME 12-31-18	Projected RY 1: 2020	Projected RY 2: 2021	Projected RY 3: 2022
GSD- LV								
Monthly Bills	60,988	61,054	61,130	61,276	61,276	60,988	61,054	61,130
Summer kWh	271,834,969	267,309,844	263,367,302	283,446,851	275,146,776	271,834,969	267,309,844	263,367,302
Summer kW Demand	920,462	905,372	892,358	790,522	790,522	758,985	746,300	735,272
kWh per Billing KW	295.32	295.25	295.14	358.56	348.06	358.16	358.18	358.19
Implied Load Factor	40.46%	40.45%	40.43%	49.12%	47.68%	49.06%	49.07%	49.07%
Winter kWh	341,588,857	336,421,450	331,512,239	345,267,257	341,964,081	341,588,857	336,421,450	331,512,239
Winter kW Demand	1,056,943	1,041,003	1,025,936	1,064,900	1,064,900	1,057,452	1,041,506	1,026,434
kWh per Billing KW	323.19	323.17	323.13	324.23	321.12	323.03	323.01	322.97
Implied Load Factor	44.27%	44.27%	44.26%	44.41%	43.99%	44.25%	44.25%	44.24%
Annual kWh	613,423,826	603,731,294	594,879,541	628,714,108	617,110,857	613,423,826	603,731,294	594,879,541
Annual kW Demand	1,977,405	1,946,375	1,918,294	1,855,422	1,855,422	1,816,437	1,787,806	1,761,706
kWh per Billing KW	310.22	310.18	310.11	338.85	332.60	337.71	337.69	337.67
Implied Load Factor	42.50%	42.49%	42.48%	46.42%	45.56%	46.26%	46.26%	46.26%
GSD-3A								
Monthly Bills	60	60	60	65	65	60	60	60
Summer kWh	556,705	547,438	539,363	551,065	534,853	556,705	547,438	539,363
Summer kW Demand	1,265	1,245	1,227	1,050	1,050	1,056	1,038	1,023
kWh per Billing KW	440.08	439.71	439.58	524.82	509.38	527.18	527.40	527.24
Implied Load Factor	60.29%	60.23%	60.22%	71.89%	69.78%	72.22%	72.25%	72.22%
Winter kWh	699,557	688,975	678,921	609,202	602,241	699,557	688,975	678,921
Winter kW Demand	1,572	1,548	1,525	1,365	1,365	1,570	1,546	1,523
kWh per Billing KW	445.01	445.07	445.19	446.30	441.20	445.58	445.65	445.78
Implied Load Factor	60.96%	60.97%	60.99%	61.14%	60.44%	61.04%	61.05%	61.07%
Annual kWh	1,256,262	1,236,413	1,218,284	1,160,267	1,137,094	1,256,262	1,236,413	1,218,284
Annual kW Demand	2,837	2,793	2,752	2,415	2,415	2,626	2,584	2,546
kWh per Billing KW	442.81	442.68	442.69	480.44	470.85	478.39	478.49	478.51
Implied Load Factor	60.66%	60.64%	60.64%	65.81%	64.50%	65.53%	65.55%	65.55%

Potomac Electric Power Company

DC PSC Formal Case No. 1156

District of Columbia Demand Billing Determinants and Load Factors

	FC 1076	FC 1087	FC 1103	FC 1139 - Pepco Direct	
	TME 12-31-08	Actual TME 3-31-11	Actual TME 12-31-12	Actual TME 3-31-16	Weather Normal TME 3-31-16
MGT-LV					
Monthly Bills					
Summer kWh	NA	NA	NA	NA	NA
Summer kW Demand	NA	NA	NA	NA	NA
kWh per Billing KW	NA	NA	NA	NA	NA
Implied Load Factor	NA	NA	NA	NA	NA
Winter kWh	NA	NA	NA	NA	NA
Winter kW Demand	NA	NA	NA	NA	NA
kWh per Billing KW	NA	NA	NA	NA	NA
Implied Load Factor	NA	NA	NA	NA	NA
Annual kWh	NA	NA	NA	NA	NA
Annual kW Demand	NA	NA	NA	NA	NA
kWh per Billing KW	NA	NA	NA	NA	NA
Implied Load Factor	NA	NA	NA	NA	NA
GT-LV					
Monthly Bills	30,164	32,302	33,544	36,468	36,468
Summer kWh	2,159,264,189	2,217,062,621	2,172,975,992	2,157,127,346	2,106,133,734
Summer kW Demand	4,915,450	5,122,229	5,070,925	5,042,779	5,042,779
kWh per Billing KW	439.28	432.83	428.52	427.77	417.65
Implied Load Factor	60.18%	59.29%	58.70%	58.60%	57.21%
Winter kWh	2,689,177,335	2,728,838,316	2,615,792,736	2,609,289,247	2,646,014,951
Winter kW Demand	6,409,725	6,620,683	6,434,038	6,616,633	6,616,633
kWh per Billing KW	419.55	412.17	406.56	394.35	399.90
Implied Load Factor	57.47%	56.46%	55.69%	54.02%	54.78%
Annual kWh	4,848,441,524	4,945,900,937	4,788,768,728	4,766,416,593	4,752,148,685
Annual kW Demand	11,325,175	11,742,912	11,504,963	11,659,412	11,659,412
kWh per Billing KW	428.11	421.18	416.24	408.80	407.58
Implied Load Factor	58.65%	57.70%	57.02%	56.00%	55.83%
Combined GT-LV and MGT-LV					
Annual kWh	4,848,441,524	4,945,900,937	4,788,768,728	4,766,416,593	4,752,148,685
Annual kW Demand	11,325,175	11,742,912	11,504,963	11,659,412	11,659,412
kWh per Billing KW	428.11	421.18	416.24	408.80	407.58
Implied Load Factor	58.65%	57.70%	57.02%	56.00%	55.83%
Total LV Bills	96,270	97,038	99,430	101,226	101,226

DC PSC Formal Case No. 1156

	FC 1150 - Pepco Direct		FC 1150 - Pepco Supplemental		FC 1150 - Pepco Settlement	
	Actual	Weather Normal	Actual	Weather Normal	Actual	Weather Normal
	TME 9-30-17	TME 9-30-17	TME 9-30-17	TME 9-30-17	TME 9-30-17	TME 9-30-17
MGT-LV						
Monthly Bills						
Summer kWh	NA	NA	NA	NA	NA	NA
Summer kW Demand	NA	NA	NA	NA	NA	NA
kWh per Billing KW	NA	NA	NA	NA	NA	NA
Implied Load Factor	NA	NA	NA	NA	NA	NA
Winter kWh	NA	NA	NA	NA	NA	NA
Winter kW Demand	NA	NA	NA	NA	NA	NA
kWh per Billing KW	NA	NA	NA	NA	NA	NA
Implied Load Factor	NA	NA	NA	NA	NA	NA
Annual kWh	NA	NA	NA	NA	NA	NA
Annual kW Demand	NA	NA	NA	NA	NA	NA
kWh per Billing KW	NA	NA	NA	NA	NA	NA
Implied Load Factor	NA	NA	NA	NA	NA	NA
GT-LV						
Monthly Bills	39,859	39,859	39,859	39,859	39,859	44,419
Summer kWh	2,053,648,248	2,049,052,812	2,053,648,248	2,049,052,812	2,053,648,248	2,166,261,985
Summer kW Demand	5,095,673	5,095,673	5,095,673	5,095,673	5,095,673	5,387,154
kWh per Billing KW	403.02	402.12	403.02	402.12	403.02	402.12
Implied Load Factor	55.21%	55.08%	55.21%	55.08%	55.21%	55.08%
Winter kWh	2,592,036,154	2,636,803,638	2,592,036,154	2,636,803,638	2,592,036,154	2,787,633,119
Winter kW Demand	6,666,523	6,666,523	6,666,523	6,666,523	6,666,523	7,047,859
kWh per Billing KW	388.81	395.53	388.81	395.53	388.81	395.53
Implied Load Factor	53.26%	54.18%	53.26%	54.18%	53.26%	54.18%
Annual kWh	4,645,684,402	4,685,856,450	4,645,684,402	4,685,856,450	4,645,684,402	4,953,895,104
Annual kW Demand	11,762,196	11,762,196	11,762,196	11,762,196	11,762,196	12,435,013
kWh per Billing KW	394.97	398.38	394.97	398.38	394.97	398.38
Implied Load Factor	54.11%	54.57%	54.11%	54.57%	54.11%	54.57%
Combined GT-LV and MGT-LV						
Annual kWh	4,645,684,402	4,685,856,450	4,645,684,402	4,685,856,450	4,645,684,402	4,953,895,104
Annual kW Demand	11,762,196	11,762,196	11,762,196	11,762,196	11,762,196	12,435,013
kWh per Billing KW	394.97	398.38	394.97	398.38	394.97	398.38
Implied Load Factor	54.11%	54.57%	54.11%	54.57%	54.11%	54.57%
Total LV Bills	39,859	39,859	39,859	39,859	39,859	44,419

Potomac Electric Power Company

DC PSC Formal Case No. 1156

District of Columbia Demand Billing Determinants and Load Factors

FC 1156: Original Filing (F)-6					
	Actual	Weather	Projected	Projected	Projected
	TME 12-31-18	Normal	RY 1: 2020	RY 2: 2021	RY 3: 2022
		TME 12-31-18			
MGT-LV					
Monthly Bills	38,952	38,952	38,988	39,193	39,209
Summer kWh	1,341,961,511	1,309,648,566	1,245,474,880	1,224,739,138	1,206,644,345
Summer kW Demand	3,402,217	3,402,217	3,170,165	3,117,621	3,072,018
kWh per Billing KW	394.44	384.94	392.87	392.84	392.79
Implied Load Factor	54.03%	52.73%	53.82%	53.81%	53.81%
Winter kWh	1,661,804,977	1,650,693,651	1,569,141,226	1,545,390,251	1,522,813,683
Winter kW Demand	4,196,062	4,196,062	3,973,891	3,913,692	3,856,522
kWh per Billing KW	396.04	393.39	394.86	394.87	394.87
Implied Load Factor	54.25%	53.89%	54.09%	54.09%	54.09%
Annual kWh	3,003,766,488	2,960,342,217	2,814,616,106	2,770,129,389	2,729,458,028
Annual kW Demand	7,598,279	7,598,279	7,144,056	7,031,313	6,928,540
kWh per Billing KW	395.32	389.61	393.98	393.97	393.94
Implied Load Factor	54.15%	53.37%	53.97%	53.97%	53.96%
GT-LV					
Monthly Bills	3,300	3,300	3,307	3,330	3,331
Summer kWh	807,006,951	787,544,226	781,415,497	768,410,423	757,108,340
Summer kW Demand	2,034,014	2,034,014	1,983,972	1,951,130	1,922,744
kWh per Billing KW	396.76	387.19	393.86	393.83	393.76
Implied Load Factor	54.35%	53.04%	53.95%	53.95%	53.94%
Winter kWh	1,064,884,594	1,057,704,411	977,856,938	963,078,034	949,049,922
Winter kW Demand	2,656,134	2,656,134	2,441,142	2,404,089	2,368,916
kWh per Billing KW	400.92	398.21	400.57	400.60	400.63
Implied Load Factor	54.92%	54.55%	54.87%	54.88%	54.88%
Annual kWh	1,871,891,545	1,845,248,637	1,759,272,435	1,731,488,457	1,706,158,262
Annual kW Demand	4,690,148	4,690,148	4,425,114	4,355,219	4,291,660
kWh per Billing KW	399.11	393.43	397.57	397.57	397.55
Implied Load Factor	54.67%	53.89%	54.46%	54.46%	54.46%
Combined GT-LV and MGT-LV					
Annual kWh	4,875,658,033	4,805,590,854	4,573,888,541	4,501,617,846	4,435,616,290
Annual kW Demand	12,288,427	12,288,427	11,569,170	11,386,532	11,220,200
kWh per Billing KW	396.77	391.07	395.35	395.35	395.32
Implied Load Factor	54.35%	53.57%	54.16%	54.16%	54.15%
Total Bills	42,252	42,252	42,295	42,523	42,540

Potomac Electric Power Company

DC PSC Formal Case No. 1156

District of Columbia Demand Billing Determinants and Load Factors

	FC 1156: Rebuttal Filing (4F)-6					FC 1156: Rebuttal REVISED - Revised (4F)-6		
	Actual TME 12-31-18	Weather Normal TME 12-31-18	Projected RY 1: 2020	Projected RY 2: 2021	Projected RY 3: 2022	Projected RY 1: 2020	Projected RY 2: 2021	Projected RY 3: 2022
MGT-LV								
Monthly Bills	39,168	39,168	39,228	39,434	39,450	39,228	39,434	39,450
Summer kWh	1,341,961,511	1,309,648,566	1,245,474,880	1,224,739,138	1,206,644,345	1,245,474,880	1,224,739,138	1,206,644,345
Summer kW Demand	3,168,996	3,168,996	3,146,799	3,094,319	3,048,688	3,146,799	3,094,319	3,048,688
kWh per Billing KW	423.47	413.27	395.79	395.80	395.79	395.79	395.80	395.79
Implied Load Factor	58.01%	56.61%	54.22%	54.22%	54.22%	54.22%	54.22%	54.22%
Winter kWh	1,661,804,977	1,650,693,651	1,569,141,226	1,545,390,251	1,522,813,683	1,569,141,226	1,545,390,251	1,522,813,683
Winter kW Demand	4,143,922	4,143,922	3,963,946	3,903,869	3,846,305	3,963,946	3,903,869	3,846,305
kWh per Billing KW	401.02	398.34	395.85	395.86	395.92	395.85	395.86	395.92
Implied Load Factor	54.93%	54.57%	54.23%	54.23%	54.24%	54.23%	54.23%	54.24%
Annual kWh	3,003,766,488	2,960,342,217	2,814,616,106	2,770,129,389	2,729,458,028	2,814,616,106	2,770,129,389	2,729,458,028
Annual kW Demand	7,312,918	7,312,918	7,110,745	6,998,188	6,894,993	7,110,745	6,998,188	6,894,993
kWh per Billing KW	410.75	404.81	395.83	395.84	395.86	395.83	395.84	395.86
Implied Load Factor	56.27%	55.45%	54.22%	54.22%	54.23%	54.22%	54.22%	54.23%
GT-LV								
Monthly Bills	3,288	3,288	3,295	3,317	3,318	3,295	3,317	3,318
Summer kWh	807,006,951	787,544,226	781,415,497	768,410,423	757,108,340	781,415,497	768,410,423	757,108,340
Summer kW Demand	1,894,895	1,894,895	1,958,420	1,925,634	1,897,294	1,958,420	1,925,634	1,897,294
kWh per Billing KW	425.88	415.61	399.00	399.04	399.05	399.00	399.04	399.05
Implied Load Factor	58.34%	56.93%	54.66%	54.66%	54.66%	54.66%	54.66%	54.66%
Winter kWh	1,064,884,594	1,057,704,411	977,856,938	963,078,034	949,049,922	977,856,938	963,078,034	949,049,922
Winter kW Demand	2,624,569	2,624,569	2,434,006	2,397,216	2,362,189	2,434,006	2,397,216	2,362,189
kWh per Billing KW	405.74	403.00	401.75	401.75	401.77	401.75	401.75	401.77
Implied Load Factor	55.58%	55.21%	55.03%	55.03%	55.04%	55.03%	55.03%	55.04%
Annual kWh	1,871,891,545	1,845,248,637	1,759,272,435	1,731,488,457	1,706,158,262	1,759,272,435	1,731,488,457	1,706,158,262
Annual kW Demand	4,519,464	4,519,464	4,392,426	4,322,850	4,259,483	4,392,426	4,322,850	4,259,483
kWh per Billing KW	414.18	408.29	400.52	400.54	400.56	400.52	400.54	400.56
Implied Load Factor	56.74%	55.93%	54.87%	54.87%	54.87%	54.87%	54.87%	54.87%
Combined GT-LV and MGT-LV								
Annual kWh	4,875,658,033	4,805,590,854	4,573,888,541	4,501,617,846	4,435,616,290	4,573,888,541	4,501,617,846	4,435,616,290
Annual kW Demand	11,832,382	11,832,382	11,503,171	11,321,038	11,154,476	11,503,171	11,321,038	11,154,476
kWh per Billing KW	412.06	406.14	397.62	397.63	397.65	397.62	397.63	397.65
Implied Load Factor	56.45%	55.64%	54.47%	54.47%	54.47%	54.47%	54.47%	54.47%
Total Bills	42,456	42,456	42,523	42,751	42,768	42,523	42,751	42,768

Potomac Electric Power Company

DC PSC Formal Case No. 1156

District of Columbia Demand Billing Determinants and Load Factors

	FC 1156: Surrebuttal Filing: Enhanced MRP			FC 1156: Errata - Supplemental Surrebuttal Filing: Enhanced MRP (5F)-6 Revised				
	Projected RY 1: 2020	Projected RY 2: 2021	Projected RY 3: 2022	Actual TME 12-31-18	Weather Normal TME 12-31-18	Projected RY 1: 2020	Projected RY 2: 2021	Projected RY 3: 2022
MGT-LV								
Monthly Bills	39,228	39,434	39,450	39,168	39,168	39,228	39,434	39,450
Summer kWh	1,245,474,880	1,224,739,138	1,206,644,345	1,341,961,511	1,309,648,566	1,245,474,880	1,224,739,138	1,206,644,345
Summer kW Demand	3,146,799	3,094,319	3,048,688	3,168,996	3,168,996	2,939,949	2,890,862	2,848,099
kWh per Billing KW	395.79	395.80	395.79	423.47	413.27	423.64	423.66	423.67
Implied Load Factor	54.22%	54.22%	54.22%	58.01%	56.61%	58.03%	58.04%	58.04%
Winter kWh	1,569,141,226	1,545,390,251	1,522,813,683	1,661,804,977	1,650,693,651	1,569,141,226	1,545,390,251	1,522,813,683
Winter kW Demand	3,963,946	3,903,869	3,846,305	4,143,922	4,143,922	3,921,403	3,862,099	3,805,838
kWh per Billing KW	395.85	395.86	395.92	401.02	398.34	400.15	400.14	400.13
Implied Load Factor	54.23%	54.23%	54.24%	54.93%	54.57%	54.81%	54.81%	54.81%
Annual kWh	2,814,616,106	2,770,129,389	2,729,458,028	3,003,766,488	2,960,342,217	2,814,616,106	2,770,129,389	2,729,458,028
Annual kW Demand	7,110,745	6,998,188	6,894,993	7,312,918	7,312,918	6,861,352	6,752,961	6,653,937
kWh per Billing KW	395.83	395.84	395.86	410.75	404.81	410.21	410.21	410.20
Implied Load Factor	54.22%	54.22%	54.23%	56.27%	55.45%	56.19%	56.19%	56.19%
GT-LV								
Monthly Bills	3,295	3,317	3,318	3,288	3,288	3,295	3,317	3,318
Summer kWh	781,415,797	768,410,423	757,108,340	807,006,951	787,544,226	781,415,497	768,410,423	757,108,340
Summer kW Demand	1,958,420	1,925,634	1,897,294	1,894,895	1,894,895	1,833,778	1,803,193	1,776,660
kWh per Billing KW	399.00	399.04	399.05	425.88	415.61	426.12	426.14	426.14
Implied Load Factor	54.66%	54.66%	54.66%	58.34%	56.93%	58.37%	58.38%	58.38%
Winter kWh	977,856,938	963,078,034	949,049,922	1,064,884,594	1,057,704,411	977,856,938	963,078,034	949,049,922
Winter kW Demand	2,434,006	2,397,216	2,362,189	2,624,569	2,624,569	2,411,554	2,375,005	2,340,345
kWh per Billing KW	401.75	401.75	401.77	405.74	403.00	405.49	405.51	405.52
Implied Load Factor	55.03%	55.03%	55.04%	55.58%	55.21%	55.55%	55.55%	55.55%
Annual kWh	1,759,272,735	1,731,488,457	1,706,158,262	1,871,891,545	1,845,248,637	1,759,272,435	1,731,488,457	1,706,158,262
Annual kW Demand	4,392,426	4,322,850	4,259,483	4,519,464	4,519,464	4,245,332	4,178,198	4,117,005
kWh per Billing KW	400.52	400.54	400.56	414.18	408.29	414.40	414.41	414.42
Implied Load Factor	54.87%	54.87%	54.87%	56.74%	55.93%	56.77%	56.77%	56.77%
Combined GT-LV and MGT-LV								
Annual kWh	4,573,888,841	4,501,617,846	4,435,616,290	4,875,658,033	4,805,590,854	4,573,888,541	4,501,617,846	4,435,616,290
Annual kW Demand	11,503,171	11,321,038	11,154,476	11,832,382	11,832,382	11,106,684	10,931,159	10,770,942
kWh per Billing KW	397.62	397.63	397.65	412.06	406.14	411.81	411.82	411.81
Implied Load Factor	54.47%	54.47%	54.47%	56.45%	55.64%	56.41%	56.41%	56.41%
Total Bills	42,523	42,751	42,768	42,456	42,456	42,523	42,751	42,768

Potomac Electric Power Company

DC PSC Formal Case No. 1156

District of Columbia Demand Billing Determinants and Load Factors

	FC 1076	FC 1087	FC 1103	FC 1139 - Pepco Direct	
	Actual	Actual	Actual	Actual	Weather Normal
	TME 12-31-08	TME 3-31-11	TME 12-31-12	TME 3-31-16	TME 3-31-16
GT-3A					
Monthly Bills	1,710	1,740	1,755	1,855	1,855
Summer kWh	1,274,660,165	1,336,868,511	1,236,453,073	1,167,595,003	1,137,821,551
Summer kW Demand	2,504,258	2,657,286	2,511,698	2,366,238	2,366,238
kWh per Billing KW	509.00	503.10	492.28	493.44	480.86
Implied Load Factor	69.73%	68.92%	67.44%	67.59%	65.87%
Winter kWh	1,463,446,472	1,515,424,781	1,408,286,155	1,389,004,059	1,381,268,445
Winter kW Demand	2,947,120	3,094,998	2,921,572	2,919,686	2,919,686
kWh per Billing KW	496.57	489.64	482.03	475.74	473.09
Implied Load Factor	68.02%	67.07%	66.03%	65.17%	64.81%
Annual kWh	2,738,106,637	2,852,293,292	2,644,739,228	2,556,599,062	2,519,089,996
Annual kW Demand	5,451,377	5,752,284	5,433,270	5,285,924	5,285,924
kWh per Billing KW	502.28	495.85	486.77	483.66	476.57
Implied Load Factor	68.81%	67.93%	66.68%	66.26%	65.28%
Annual kWh	2,738,106,637	2,852,293,292	2,644,739,228	2,556,599,062	2,518,981,750
Annual kW Demand	5,451,377	5,752,284	5,433,270	5,285,924	5,285,924
kWh per Billing KW	502.28	495.85	486.77	483.66	476.55
Implied Load Factor	68.81%	67.93%	66.68%	66.26%	65.28%

Potomac Electric Power Company

DC PSC Formal Case No. 1156

District of Columbia Demand Billing Determinants and Load Factors

	FC 1150 - Pepco Direct		FC 1150 - Pepco Supplemental		FC 1150 - Pepco Settlement	
	Weather		Weather		Weather	
	Actual TME 9-30-17	Normal TME 9-30-17	Actual TME 9-30-17	Normal TME 9-30-17	Actual TME 9-30-17	Normal TME 9-30-17
GT-3A						
Monthly Bills	1,876	1,876	1,876	1,876	1,876	1,876
Summer kWh	1,076,664,892	1,075,480,652	1,076,664,892	1,072,480,652	1,076,664,892	1,072,480,652
Summer kW Demand	2,184,804	2,184,804	2,184,804	2,184,804	2,184,804	2,184,804
kWh per Billing KW	492.80	492.25	492.80	490.88	492.80	490.88
Implied Load Factor	67.51%	67.43%	67.51%	67.24%	67.51%	67.24%
Winter kWh	1,338,647,611	1,336,033,129	1,338,647,611	1,336,033,129	1,338,647,611	1,336,033,129
Winter kW Demand	2,850,622	2,850,622	2,850,622	2,850,622	2,850,622	2,850,622
kWh per Billing KW	469.60	468.68	469.60	468.68	469.60	468.68
Implied Load Factor	64.33%	64.20%	64.33%	64.20%	64.33%	64.20%
Annual kWh	2,415,312,503	2,411,513,781	2,415,312,503	2,408,513,781	2,415,312,503	2,408,513,781
Annual kW Demand	5,035,426	5,035,426	5,035,426	5,035,426	5,035,426	5,035,426
kWh per Billing KW	479.66	478.91	479.66	478.31	479.66	478.31
Implied Load Factor	65.71%	65.60%	65.71%	65.52%	65.71%	65.52%
Annual kWh	2,415,312,503	2,408,513,781	2,415,312,503	2,408,513,781	2,415,312,503	2,408,513,781
Annual kW Demand	5,035,426	5,035,426	5,035,426	5,035,426	5,035,426	5,035,426
kWh per Billing KW	479.66	478.31	479.66	478.31	479.66	478.31
Implied Load Factor	65.71%	65.52%	65.71%	65.52%	65.71%	65.52%

Potomac Electric Power Company

DC PSC Formal Case No. 1156

District of Columbia Demand Billing Determinants and Load Factors

FC 1156: Original Filing (F)-6					
	Actual	Weather	Projected	Projected	Projected
	TME 12-31-18	Normal	RY 1: 2020	RY 2: 2021	RY 3: 2022
		TME 12-31-18			
GT-3A					
Monthly Bills	1,867	1,867	1,860	1,862	1,865
Summer kWh	1,102,431,669	1,076,105,635	1,056,842,969	1,039,250,136	1,023,922,281
Summer kW Demand	2,335,482	2,335,482	2,241,350	2,203,935	2,171,412
kWh per Billing KW	472.04	460.76	471.52	471.54	471.55
Implied Load Factor	64.66%	63.12%	64.59%	64.59%	64.60%
Winter kWh	1,244,208,828	1,244,208,828	1,328,032,898	1,307,942,995	1,288,856,912
Winter kW Demand	2,644,583	2,644,583	2,814,421	2,771,817	2,731,418
kWh per Billing KW	470.47	470.47	471.87	471.87	471.86
Implied Load Factor	64.45%	64.45%	64.64%	64.64%	64.64%
Annual kWh	2,346,640,497	2,320,314,463	2,384,875,867	2,347,193,131	2,312,779,193
Annual kW Demand	4,980,065	4,980,065	5,055,771	4,975,752	4,902,830
kWh per Billing KW	471.21	465.92	471.71	471.73	471.72
Implied Load Factor	64.55%	63.82%	64.62%	64.62%	64.62%
Annual kWh	2,346,640,497	2,320,314,463	2,384,875,867	2,347,193,131	2,312,779,193
Annual kW Demand	4,980,065	4,980,065	5,055,771	4,975,752	4,902,830
kWh per Billing KW	471.21	465.92	471.71	471.73	471.72
Implied Load Factor	64.55%	63.82%	64.62%	64.62%	64.62%

Potomac Electric Power Company

DC PSC Formal Case No. 1156

District of Columbia Demand Billing Determinants and Load Factors

	FC 1156: Rebuttal Filing (4F)-6					FC 1156: Rebuttal REVISED - Revised (4F)-6		
	Actual TME 12-31-18	Weather Normal TME 12-31-18	Projected RY 1: 2020	Projected RY 2: 2021	Projected RY 3: 2022	Projected RY 1: 2020	Projected RY 2: 2021	Projected RY 3: 2022
GT-3A								
Monthly Bills	1,867	1,867	1,860	1,862	1,865	1,860	1,862	1,865
Summer kWh	1,102,431,669	1,076,105,635	1,056,842,969	1,039,250,136	1,023,922,281	1,056,842,969	1,039,250,136	1,023,922,281
Summer kW Demand	2,331,604	2,331,604	2,241,350	2,203,935	2,171,412	2,241,350	2,203,935	2,171,412
kWh per Billing KW	472.82	461.53	471.52	471.54	471.55	471.52	471.54	471.55
Implied Load Factor	64.77%	63.22%	64.59%	64.59%	64.60%	64.59%	64.59%	64.60%
Winter kWh	1,244,208,828	1,244,208,828	1,328,032,898	1,307,942,995	1,288,856,912	1,328,032,898	1,307,942,995	1,288,856,912
Winter kW Demand	2,643,872	2,643,872	2,814,421	2,771,817	2,731,418	2,814,421	2,771,817	2,731,418
kWh per Billing KW	470.60	470.60	471.87	471.87	471.86	471.87	471.87	471.86
Implied Load Factor	64.47%	64.47%	64.64%	64.64%	64.64%	64.64%	64.64%	64.64%
Annual kWh	2,346,640,497	2,320,314,463	2,384,875,867	2,347,193,131	2,312,779,193	2,384,875,867	2,347,193,131	2,312,779,193
Annual kW Demand	4,975,476	4,975,476	5,055,771	4,975,752	4,902,830	5,055,771	4,975,752	4,902,830
kWh per Billing KW	471.64	466.35	471.71	471.73	471.72	471.71	471.73	471.72
Implied Load Factor	64.61%	63.88%	64.62%	64.62%	64.62%	64.62%	64.62%	64.62%
Annual kWh	2,346,640,497	2,320,314,463	2,384,875,867	2,347,193,131	2,312,779,193	2,384,875,867	2,347,193,131	2,312,779,193
Annual kW Demand	4,975,476	4,975,476	5,055,771	4,975,752	4,902,830	5,055,771	4,975,752	4,902,830
kWh per Billing KW	471.64	466.35	471.71	471.73	471.72	471.71	471.73	471.72
Implied Load Factor	64.61%	63.88%	64.62%	64.62%	64.62%	64.62%	64.62%	64.62%

Potomac Electric Power Company

DC PSC Formal Case No. 1156

District of Columbia Demand Billing Determinants and Load Factors

	FC 1156: Surrebuttal Filing: Enhanced MRP			FC 1156: Errata - Supplemental Surrebuttal Filing: Enhanced MRP (5F)-6 Revised				
	Projected	Projected	Projected	Actual	Weather	Projected	Projected	Projected
	RY 1: 2020	RY 2: 2021	RY 3: 2022	TME 12-31-18	Normal TME 12-31-18	RY 1: 2020	RY 2: 2021	RY 3: 2022
GT-3A								
Monthly Bills	1,860	1,862	1,865	1,867	1,867	1,860	1,862	1,865
Summer kWh	1,056,842,969	1,039,250,136	1,023,922,281	1,102,431,669	1,076,105,635	1,056,842,969	1,039,250,136	1,023,922,281
Summer kW Demand	2,241,350	2,203,935	2,171,412	2,331,604	2,331,604	2,237,364	2,200,006	2,167,531
kWh per Billing KW	471.52	471.54	471.55	472.82	461.53	472.36	472.39	472.39
Implied Load Factor	64.59%	64.59%	64.60%	64.77%	63.22%	64.71%	64.71%	64.71%
		0.985					0.985	
Winter kWh	1,328,032,898	1,307,942,995	1,288,856,912	1,244,208,828	1,244,208,828	1,328,032,898	1,307,942,995	1,288,856,912
Winter kW Demand	2,814,421	2,771,817	2,731,418	2,643,872	2,643,872	2,813,817	2,771,224	2,730,835
kWh per Billing KW	471.87	471.87	471.86	470.60	470.60	471.97	471.97	471.96
Implied Load Factor	64.64%	64.64%	64.64%	64.47%	64.47%	64.65%	64.65%	64.65%
Annual kWh	2,384,875,867	2,347,193,131	2,312,779,193	2,346,640,497	2,320,314,463	2,384,875,867	2,347,193,131	2,312,779,193
Annual kW Demand	5,055,771	4,975,752	4,902,830	4,975,476	4,975,476	5,051,181	4,971,230	4,898,366
kWh per Billing KW	471.71	471.73	471.72	471.64	466.35	472.14	472.16	472.15
Implied Load Factor	64.62%	64.62%	64.62%	64.61%	63.88%	64.68%	64.68%	64.68%
Annual kWh	2,384,975,967	2,347,193,131	2,312,779,193	2,346,640,497	2,320,314,463	2,384,875,867	2,347,193,131	2,312,779,193
Annual kW Demand	5,055,771	4,975,752	4,902,830	4,975,476	4,975,476	5,051,181	4,971,230	4,898,366
kWh per Billing KW	471.73	471.73	471.72	471.64	466.35	472.14	472.16	472.15
Implied Load Factor	64.62%	64.62%	64.62%	64.61%	63.88%	64.68%	64.68%	64.68%

Potomac Electric Power Company

DC PSC Formal Case No. 1156

Pepco FC 1156 Demand Billing Determinants by Rate Class

Rate Class/Pepco Scenario	Annual Demand Billing Units				
	CY 2018 Data - Orig Filing		Estimated Future Year Data		
	Actual	Normalized	RY 1	RY 2	RY 3
GSD- LV					
Pepco Exh (F)-6	2,009,424	2,009,424	1,977,405	905,372	892,358
Pepco Exh (4F)-6	1,855,422	1,855,422	1,977,405	1,946,375	1,918,294
Pepco Exh (4F)-6 Revised	1,855,422	1,855,422	1,816,437	1,787,806	1,761,706
Pepco Exh (5F)-6	1,787,806	1,761,706	1,977,405	1,946,375	1,918,294
Pepco Exh (5F)-6 Revised	1,855,422	1,855,422	1,816,437	1,787,806	1,761,706
GSD-3A					
Pepco Exh (F)-6	2,583	2,583	2,837	2,793	2,752
Pepco Exh (4F)-6	2,415	2,415	2,837	2,793	2,752
Pepco Exh (4F)-6 Revised	2,415	2,415	2,626	2,584	2,546
Pepco Exh (5F)-6	2,584	2,546	2,837	2,793	2,752
Pepco Exh (5F)-6 Revised	2,415	2,415	2,626	2,584	2,546
MGT-LV					
Pepco Exh (F)-6	7,598,279	7,598,279	7,144,056	7,031,313	6,928,540
Pepco Exh (4F)-6	7,312,918	7,312,918	7,110,745	6,998,188	6,894,993
Pepco Exh (4F)-6 Revised	7,312,918	7,312,918	6,861,352	6,752,961	6,653,937
Pepco Exh (5F)-6	6,752,961	6,653,937	7,110,745	6,998,188	6,894,993
Pepco Exh (5F)-6 Revised	7,312,918	7,312,918	6,861,352	6,752,961	6,653,937
GT-LV					
Pepco Exh (F)-6	4,690,148	4,690,148	4,425,114	4,355,219	4,291,660
Pepco Exh (4F)-6	4,519,464	4,519,464	4,392,426	4,322,850	4,259,483
Pepco Exh (4F)-6 Revised	4,519,464	4,519,464	4,245,332	4,178,198	4,117,005
Pepco Exh (5F)-6	4,178,198	4,117,005	4,392,426	4,322,850	4,259,483
Pepco Exh (5F)-6 Revised	4,519,464	4,519,464	4,245,332	4,178,198	4,117,005
GT-3A					
Pepco Exh (F)-6	4,980,065	4,980,065	5,055,771	4,975,752	4,902,830
Pepco Exh (4F)-6	4,975,476	4,975,476	5,055,771	4,975,752	4,902,830
Pepco Exh (4F)-6 Revised	4,975,476	4,975,476	5,051,181	4,971,230	4,898,366
Pepco Exh (5F)-6	4,971,230	4,898,366	5,055,771	4,975,752	4,902,830
Pepco Exh (5F)-6 Revised	4,975,476	4,975,476	5,051,181	4,971,230	4,898,366

Potomac Electric Power Company

DC PSC Formal Case No. 1156

Pepco Load Factors for Demand Billing Classes by Rate Year

Rate Class/Source	Average Annual Load Factors				
	CY 2018 Data		Estimated Future Year Data		
	Actual	NW	RY 1	RY 2	RY 3
GSD- LV					
Exh Pepco (F)-6	42.86%	42.07%	42.50%	42.49%	42.48%
Exh Pepco (4F)-6	46.42%	45.56%	42.50%	42.49%	42.48%
Exh Pepco (4F)-6 Revised 1/	46.42%	45.56%	46.26%	46.26%	46.26%
Exh Pepco (5F)-6			42.50%	42.49%	42.48%
Exh Pepco (5F)-6 Revised 2/			46.26%	46.26%	46.26%
GSD-3A					
Exh Pepco (F)-6	61.53%	60.30%	60.66%	60.64%	60.64%
Exh Pepco (4F)-6	65.81%	64.50%	60.66%	60.64%	60.64%
Exh Pepco (4F)-6 Revised 1/	65.81%	64.50%	65.53%	65.55%	65.55%
Exh Pepco (5F)-6			60.66%	60.64%	60.64%
Exh Pepco (5F)-6 Revised 2/			65.53%	65.55%	65.55%
MGT-LV					
Exh Pepco (F)-6	54.15%	53.37%	53.97%	53.97%	53.96%
Exh Pepco (4F)-6	56.27%	55.45%	54.22%	54.22%	54.23%
Exh Pepco (4F)-6 Revised 1/	56.27%	55.45%	56.19%	56.19%	56.19%
Exh Pepco (5F)-6			54.22%	54.22%	54.23%
Exh Pepco (5F)-6 Revised 2/			56.19%	56.19%	56.19%
GT-LV					
Exh Pepco (F)-6	54.67%	53.89%	54.46%	54.46%	54.46%
Exh Pepco (4F)-6	56.74%	55.93%	54.87%	54.87%	54.87%
Exh Pepco (4F)-6 Revised 1/	56.74%	55.93%	56.77%	56.77%	56.77%
Exh Pepco (5F)-6			54.87%	54.87%	54.87%
Exh Pepco (5F)-6 Revised 2/			56.77%	56.77%	56.77%
GT-3A					
Exh Pepco (F)-6	64.55%	63.82%	64.62%	64.62%	64.62%
Exh Pepco (4F)-6	64.61%	63.88%	64.62%	64.62%	64.62%
Exh Pepco (4F)-6 Revised 1/	64.61%	63.88%	64.68%	64.68%	64.68%
Exh Pepco (5F)-6			64.62%	64.62%	64.62%
Exh Pepco (5F)-6 Revised 2/			64.68%	64.68%	64.68%

1/ From Pepco Response to Staff DR 24-24, Attachment A; Exhibit Pepco (6F)-22, pages 20 of 344 to 43 of 344; and Exhibit Pepco (6F)-26, pages 17 of 64 to 40 of 64.

2/ From Pepco Response to Staff DR 24-24, Attachment; Exhibit Pepco (6F)-22, pages 102 of 344 to 142 of 344; and Exhibit Pepco (6F)-27, pages 30 of 141 to 70 of 141.

Potomac Electric Power Company

DC PSC Formal Case No. 1156

Pepco Rebuttal Changes in TTPCF Billing Determinants

		Reported CY 2018 Actual Annual Billing Units				
		GSD-LV	GS-3A	MGT-LV	GT-LV	GT-3A
Monthly Bills						
Direct	Pepco (F)-14	61,276	65	38,952	3,300	1,867
Rebuttal	Pepco (4F)-14	61,276	65	39,168	3,288	1,867
Change	Rebuttal - Direct	-	-	216	(12)	-
Annual kWh						
Direct	Pepco (F)-14	628,714,108	1,160,267	3,003,766,488	1,871,891,545	2,346,640,497
Rebuttal	Pepco (4F)-14	628,714,108	1,160,267	3,003,766,488	1,871,891,545	2,346,640,497
Change	Rebuttal - Direct	-	-	-	-	-
Annual kW Demand Units						
Direct	Pepco (F)-14	2,009,424	2,583	7,598,279	4,690,148	4,980,065
Rebuttal	Pepco (4F)-14	1,855,422	2,415	7,312,918	4,519,463	4,975,476
Change	Rebuttal - Direct	(154,002)	(168)	(285,361)	(170,685)	(4,589)
% Change		-7.7%	-6.5%	-3.8%	-3.6%	-0.1%

Potomac Electric Power Company

DC PSC Formal Case No. 1156

Calendar Year 2018 Actual and Normal Heating and Cooling Degree Day Measures by Month

From Exhibit Pepco (F)-9, page 4 of 6 and 5 of 6

Mon	Yr	HDD 65				HDD 35				CDD 65			
		Actual	30-Yr Avg	Variation	% Variation	Actual	30-Yr Avg	Variation	% Variation	Actual	30-Yr Avg	Variation	% Variation
		HDD 65	Normal HDD 65	From Normal	From Normal	HDD 35	Normal HDD 35	From Normal	From Normal	CDD 65	Normal CDD 65	From Normal	From Normal
Jan	2018	920	809	111	13.7%	155	63	92	146.0%	-	-	-	0.0%
Feb	2018	932	835	97	11.6%	59	78	(19)	-24.4%	1	-	1	0.0%
Mar	2018	572	631	(59)	-9.4%	5	31	(26)	-83.9%	3	2	1	50.0%
Apr	2018	497	408	89	21.8%	1	3	(2)	-66.7%	12	13	(1)	-7.7%
May	2018	155	154	1	0.6%	-	-	-	0.0%	109	62	47	75.8%
Jun	2018	3	35	(32)	-91.4%	-	-	-	0.0%	266	219	47	21.5%
Jul	2018	-	1	(1)	-100.0%	-	-	-	0.0%	436	404	32	7.9%
Aug	2018	-	-	-	0.0%	-	-	-	0.0%	477	458	19	4.1%
Sep	2018	1	5	(4)	-80.0%	-	-	-	0.0%	420	334	86	25.7%
Oct	2018	62	90	(28)	-31.1%	-	-	-	0.0%	223	116	107	92.2%
Nov	2018	379	329	50	15.2%	1	1	-	0.0%	30	14	16	114.3%
Dec	2018	649	605	44	7.3%	5	18	(13)	-72.2%	-	1	(1)	-100.0%
Total		4,170	3,902	268	6.9%	226	194	32	16.5%	1,977	1,623	354	21.8%

Potomac Electric Power Company

DC PSC Formal Case No. 1156

Summary of AOBA Computed Distribution Rate Increases by Class*Under Pepco's MRP (Revised) and Enhanced MRP (Revised) Proposals*

Rate Class	Percent Increase from Current Rates							
	Pepco MRP (Revised)			Pepco Enhanced MRP (Revised)				Post-MRP
	RY 1 2020*	RY 2 2021	RY 3 2022	RY 1 2020*	RY 2 2021	RY 3 2022	RY 3 - ERR 2022	2023**
R	35.2%	50.7%	64.7%	-2.6%	-2.4%	49.6%	27.5%	49.6%
MMA	13.4%	21.8%	26.5%	2.9%	4.0%	30.3%	-13.4%	30.3%
GS-ND	19.8%	28.5%	36.4%	4.3%	5.2%	33.0%	18.8%	33.0%
GSD-LV	22.8%	32.5%	41.6%	7.0%	8.5%	38.0%	23.5%	38.0%
GS 3A	-0.6%	0.8%	2.2%	-0.1%	1.3%	2.5%	-33.1%	2.5%
MGT LV	26.4%	35.8%	44.1%	11.0%	12.4%	42.7%	32.7%	42.7%
GT LV	32.5%	42.4%	51.0%	17.3%	19.0%	51.0%	36.1%	51.0%
GT 3B	9.1%	15.8%	21.4%	-1.1%	0.0%	19.3%	-29.9%	19.3%
GT 3A	14.3%	23.4%	32.0%	-0.2%	1.3%	28.7%	14.9%	28.7%

RY = Rate Year (each rate year is a calendar year that begins January 1 and ends December 31).

ERR reflects Pepco proposed rate credits that will only be effective in calendar year 2022 under Enhanced MRP. The expiration of offered ERR Credits would result in effective double digit rate increases as of January 1, 2023.

* Rate Year 1 will most likely be completed before any new rates go into effect.

** Increases that will be effective January 1, 2023 if no further rate increases are approved prior to that date.

Potomac Electric Power Company

DC PSC Formal Case No. 1156

Pepco Revisions to Calendar Year 2018 Billing Demands

	Pepco Reported 2018 Actual Billing Demand Units												2018
	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
GS LV	153,963	159,411	152,224	143,044	155,894	150,591	168,025	266,085	207,500	152,836	145,278	154,573	2,009,424
GS 3A	240	216	214	192	255	244	203	359	186	224	167	83	2,583
MGT LV*	592,772	612,280	587,025	566,853	537,779	562,127	644,166	827,675	693,816	651,554	554,217	602,801	7,433,064
GT LV*	355,415	381,442	388,765	366,793	348,168	360,301	395,708	498,663	406,823	389,312	334,640	356,203	4,582,234
GT 3A	354,022	335,347	451,784	324,254	497,688	355,632	522,032	523,597	465,865	468,356	370,381	311,107	4,980,065
GT 3B	28,368	29,282	26,561	28,894	32,652	35,446	32,933	37,015	27,972	37,123	3,874	66,442	386,562
Total	1,484,780	1,517,978	1,606,573	1,430,030	1,572,436	1,464,341	1,763,067	2,153,394	1,802,162	1,699,405	1,408,557	1,491,209	19,393,932

	Pepco Revised Billing Demand kW												2018
	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
GS LV	154,256	159,404	152,237	143,111	155,980	150,622	168,069	162,030	156,817	152,984	145,434	154,478	1,855,422
GS 3A	240	216	213	191	255	244	203	192	187	224	167	83	2,415
MGT LV	632,812	608,521	592,042	577,626	603,902	579,319	653,158	673,399	612,715	650,406	549,131	579,889	7,312,919
GT LV	406,308	386,861	378,342	368,359	365,723	349,655	389,699	403,555	362,154	389,831	339,774	379,201	4,519,463
GT 3A	354,029	335,350	451,792	324,255	496,947	355,640	522,042	520,479	465,083	468,360	370,383	311,116	4,975,476
GT 3B	28,368	29,282	26,561	28,894	32,652	35,446	32,933	37,015	27,972	37,123	3,874	66,441	386,561
Total	1,576,013	1,519,634	1,601,187	1,442,436	1,655,459	1,470,926	1,766,104	1,796,670	1,624,928	1,698,928	1,408,763	1,491,208	19,052,256

	Pepco Revised Billing Demand kW												2018
	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
GS LV	293	(7)	13	67	86	31	44	(104,055)	(50,683)	148	156	(95)	(154,002)
GS 3A	-	-	(1)	(1)	-	-	-	(167)	1	-	-	-	(168)
MGT LV	40,040	(3,759)	5,017	10,773	66,123	17,192	8,993	(154,276)	(81,101)	(1,148)	(5,086)	(22,912)	(120,146)
GT LV	50,893	5,419	(10,423)	1,566	17,555	(10,646)	(6,010)	(95,108)	(44,669)	519	5,134	22,998	(62,770)
GT 3A	7	3	8	1	(741)	8	10	(3,118)	(782)	4	2	9	(4,589)
GT 3B	-	-	-	-	-	-	-	-	-	-	-	(1)	(1)
Total	91,233	1,656	(5,386)	12,406	83,023	6,585	3,037	(356,724)	(177,234)	(477)	206	(1)	(341,676)

	Pepco Revised Billing Demand kW												2018
	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
GS LV	0.19%	0.00%	0.01%	0.05%	0.06%	0.02%	0.03%	-39.11%	-24.43%	0.10%	0.11%	-0.06%	-7.66%
GS 3A	0.00%	0.00%	-0.47%	-0.52%	0.00%	0.00%	0.00%	-46.52%	0.54%	0.00%	0.00%	0.00%	-6.50%
MGT LV	6.75%	-0.61%	0.85%	1.90%	12.30%	3.06%	1.40%	-18.64%	-11.69%	-0.18%	-0.92%	-3.80%	-1.62%
GT LV	14.32%	1.42%	-2.68%	0.43%	5.04%	-2.95%	-1.52%	-19.07%	-10.98%	0.13%	1.53%	6.46%	-1.37%
GT 3A	0.00%	0.00%	0.00%	0.00%	-0.15%	0.00%	0.00%	-0.60%	-0.17%	0.00%	0.00%	0.00%	-0.09%
GT 3B	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total	6.14%	0.11%	-0.34%	0.87%	5.28%	0.45%	0.17%	-16.57%	-9.83%	-0.03%	0.01%	0.00%	-1.76%

Potomac Electric Power Company*DC PSC Formal Case No. 1156****Excess Rate Year 3 Bill Credits Under Pepco's Proposed Rider ERR****From Exhibit Pepco (6F)-27*

	MMA	GT-3A	GT-3B
Revenue at Current Rates - Rate Year 1	\$ 10,689,645	\$ 51,756	\$ 421,572
Proposed Rate Year 3 Revenue Requirement (Excl. ERR Credits)	\$ 13,537,879	\$ 51,756	\$ 536,080
Proposed Overall MRP Enhanced Increase from Current Rates	\$ 2,848,234	\$ -	\$ 114,508
Proposed Rate Year 3 ERR Credits	\$ (4,802,278)	\$ (19,229)	\$ (950,342)
ERR Credits in Excess of Proposed Increase	\$ (1,954,044)	\$ (19,229)	\$ (835,834)
ERR Credits in Excess of Total Proposed RY 3 Revenue Requirement		\$ -	\$ (414,262)

Potomac Electric Power Company

Formal Case No. 1156

Customer, Demand, and kWh Billing Units for Demand Metered Classes from Each of Pepco's Rate Design Filings in Formal Case No. 1150

Billing Units for the 12 Months Ended September 2017

	Direct Testimony Exhibit (E)-1				Supplemental Direct Exhibit (2E)-1				Settlement Exhibit (2E)-1			
	Actual	Weather Normalized	WN Adjustment	% Change	Actual	Weather Normalized	WN Adjustment	% Change	Actual	Weather Normalized	WN Adjustment	% Change
Rate Schedule GSD-LV												
Monthly Customer Charge	61,205	61,205	-	0.00%	61,205	61,205	-	0.00%	61,205	61,205	-	0.00%
Kilowatt-Hour Charge												
Summer kWh	282,841,856	281,887,701	(954,155)	-0.34%	282,841,856	281,887,701	(954,155)	-0.34%	282,841,856	281,887,701	(954,155)	-0.34%
Winter kWh	349,487,410	356,314,370	6,826,960	1.95%	349,487,410	356,314,370	6,826,960	1.95%	349,487,410	356,314,370	6,826,960	1.95%
Total	632,329,266	638,202,071	5,872,805	0.93%	632,329,266	638,202,071	5,872,805	0.93%	632,329,266	638,202,071	5,872,805	0.93%
kW Demand Charge												
Summer kW	917,178	917,178	-	0.00%	917,178	917,178	-	0.00%	917,178	917,178	-	0.00%
Winter kW	1,103,219	1,103,219	-	0.00%	1,103,219	1,103,219	-	0.00%	1,103,219	1,103,219	-	0.00%
Total	2,020,397	2,020,397	-	0.00%	2,020,397	2,020,397	-	0.00%	2,020,397	2,020,397	-	0.00%
Rate Schedule GSD-3A												
Monthly Customer Charge	80	80	-	0.00%	80	80	-	0.00%	80	80	-	0.00%
Kilowatt-Hour Charge												
Summer kWh	663,154	661,172	(1,982)	-0.30%	663,154	661,172	(1,982)	-0.30%	663,154	661,172	(1,982)	-0.30%
Winter kWh	905,230	923,070	17,840	1.97%	905,230	923,070	17,840	1.97%	905,230	923,070	17,840	1.97%
Total	1,568,384	1,584,242	15,858	1.01%	1,568,384	1,584,242	15,858	1.01%	1,568,384	1,584,242	15,858	1.01%
kW Demand Charge												
Summer kW	1,501	1,501	-	0.00%	1,501	1,501	-	0.00%	1,501	1,501	-	0.00%
Winter kW	2,095	2,095	-	0.00%	2,095	2,095	-	0.00%	2,095	2,095	-	0.00%
Total	3,596	3,596	-	0.00%	3,596	3,596	-	0.00%	3,596	3,596	-	0.00%
Rate Schedule GT-LV												
Monthly Customer Charge	39,859	39,859	-	0.00%	39,859	39,859	-	0.00%	39,859	44,419	4,560	11.44%
Kilowatt-Hour Charge												
Summer kWh	2,053,648,248	2,049,052,812	(4,595,436)	-0.22%	2,053,648,248	2,049,052,812	(4,595,436)	-0.22%	2,053,648,248	2,166,261,985	112,613,737	5.48%
Winter kWh	2,592,036,154	2,636,803,638	44,767,484	1.73%	2,592,036,154	2,636,803,638	44,767,484	1.73%	2,592,036,154	2,787,633,119	195,596,965	7.55%
Total	4,645,684,402	4,685,856,450	40,172,048	0.86%	4,645,684,402	4,685,856,450	40,172,048	0.86%	4,645,684,402	4,953,895,104	308,210,702	6.63%
kW Demand Charge												
Summer kW	5,095,673	5,095,673	-	0.00%	5,095,673	5,095,673	-	0.00%	5,095,673	5,387,154	291,481	5.72%
Winter kW	6,666,523	6,666,523	-	0.00%	6,666,523	6,666,523	-	0.00%	6,666,523	7,047,859	381,336	5.72%
Total	11,762,196	11,762,196	-	0.00%	11,762,196	11,762,196	-	0.00%	11,762,196	12,435,013	672,817	5.72%
Rate Schedule GT-3A												
Monthly Customer Charge	1,876	1,876	-	0.00%	1,876	1,876	-	0.00%	1,876	1,876	-	0.00%
Kilowatt-Hour Charge												
Summer kWh	1,076,664,892	1,072,480,652	(4,184,240)	-0.39%	1,076,664,892	1,072,480,652	(4,184,240)	-0.39%	1,076,664,892	1,072,480,652	(4,184,240)	-0.39%
Winter kWh	1,338,647,611	1,336,033,129	(2,614,482)	-0.20%	1,338,647,611	1,336,033,129	(2,614,482)	-0.20%	1,338,647,611	1,336,033,129	(2,614,482)	-0.20%
Total	2,415,312,503	2,408,513,781	(6,798,722)	-0.28%	2,415,312,503	2,408,513,781	(6,798,722)	-0.28%	2,415,312,503	2,408,513,781	(6,798,722)	-0.28%
kW Demand Charge												
Summer kW	2,184,804	2,184,804	-	0.00%	2,184,804	2,184,804	-	0.00%	2,184,804	2,184,804	-	0.00%
Winter kW	2,850,622	2,850,622	-	0.00%	2,850,622	2,850,622	-	0.00%	2,850,622	2,850,622	-	0.00%
Total	5,035,426	5,035,426	-	0.00%	5,035,426	5,035,426	-	0.00%	5,035,426	5,035,426	-	0.00%

Potomac Electric Power Company

DC PSC Formal Case No. 1156

Changes in Pepco FC 1150 Normal Weather GT-LV Billing Determinants

GT-LV Billing Determinants			
	Annual Billing Months	Annual Normal Weather kWh	Annual Normal Weather kW
Exhibit Pepco (E)-1 - TME Sep 2017			
Summer		2,049,052,812	5,095,673
Winter		2,636,803,638	6,666,523
Annual	39,859	4,685,856,450	11,762,196
Exhibit Pepco (2E)-1 - TME Sep 2017			
Summer		2,049,052,812	5,095,673
Winter		2,636,803,638	6,666,523
Annual	39,859	4,685,856,450	11,762,196
Exhibit Pepco (3E)-1 - TME Sep 2017			
Summer		2,166,261,985	5,387,154
Winter		2,787,633,119	7,047,859
Annual	44,419	4,953,895,104	12,435,013
Changes in GT-LV Billing Determinants 1/			
Summer		117,209,173	291,481
Winter		150,829,481	381,336
Annual	4,560	268,038,654	672,817
% Changes in GT-LV Billing Determinants			
Summer		5.72%	5.72%
Winter		5.72%	5.72%
Annual	11.44%	5.72%	5.72%

1/ Changes equal Exhibit Pepco (3E)-1 less Exhibit Pepco (2E)-1.

Note: kWh and kW billing determinants in Exhibits Pepco (E)-1 and (2E)-1 are identical.

Potomac Electric Power Company

DC PSC Formal Case No. 1156

Pepco DC BSA Revenue Under-Recoveries - January through August 2020

	R	MMA	GS-ND	GSD-LV	GS-3A	MGT-LV	GT-LV	GT-3A	GT-3B	Total All Classes	Demand Classes
Jan - Mar 2020											
Authorized Revenue	\$19,932,337	\$2,415,469	\$3,387,932	\$7,156,063	\$13,031	\$33,160,984	\$20,735,229	\$11,236,665	\$108,786	\$98,146,497	\$72,410,759
Actual Base Dist Revenue	\$19,113,050	\$2,318,948	\$3,154,570	\$6,862,477	\$11,616	\$30,045,263	\$15,888,765	\$10,266,197	\$150,420	\$87,811,306	\$63,224,739
Under-recovery	\$ (819,287)	\$ (96,521)	\$ (233,362)	\$ (293,586)	\$ (1,415)	\$ (3,115,721)	\$ (4,846,464)	\$ (970,468)	\$ 41,634	\$ (10,335,190)	\$ (9,186,020)
% Under-recovered	-4.1%	-4.0%	-6.9%	-4.1%	-10.9%	-9.4%	-23.4%	-8.6%	38.3%	-10.5%	-12.7%
Apr - Jun 2020											
Authorized Revenue	\$18,729,345	\$2,495,903	\$3,243,723	\$7,258,584	\$15,640	\$32,044,676	\$19,708,083	\$12,680,247	\$107,054	\$96,283,254	\$71,814,283
Actual Base Dist Revenue	\$18,311,358	\$2,444,624	\$2,716,881	\$5,379,357	\$12,332	\$25,163,574	\$12,874,857	\$9,953,948	\$78,440	\$76,935,371	\$53,462,507
Under-recovery	\$ (417,987)	\$ (51,280)	\$ (526,841)	\$ (1,879,227)	\$ (3,308)	\$ (6,881,102)	\$ (6,833,227)	\$ (2,726,299)	\$ (28,614)	\$ (19,347,883)	\$ (18,351,776)
% Under-recovered	-2.2%	-2.1%	-16.2%	-25.9%	-21.1%	-21.5%	-34.7%	-21.5%	-26.7%	-20.1%	-25.6%
Jul 2020											
Authorized Revenue	\$8,130,171	\$1,030,552	\$1,294,585	\$2,882,237	\$5,646	\$10,942,856	\$6,792,155	\$4,447,389	\$33,836	\$35,559,426	\$25,104,119
Actual Base Dist Revenue	\$8,380,001	\$1,062,897	\$1,171,003	\$2,461,809	\$6,455	\$9,937,205	\$4,822,062	\$3,729,286	\$36,956	\$31,607,675	\$20,993,774
Under-recovery	\$249,830	\$32,345	\$ (123,582)	\$ (420,428)	\$809	\$ (1,005,651)	\$ (1,970,093)	\$ (718,102)	\$3,120	\$ (3,951,751)	\$ (4,110,345)
% Under-recovered	3.1%	3.1%	-9.5%	-14.6%	14.3%	-9.2%	-29.0%	-16.1%	9.2%	-11.1%	-16.4%
Aug 2020											
Authorized Revenue	\$8,202,651	\$1,072,947	\$1,288,571	\$3,530,474	\$7,191	\$13,973,478	\$8,843,971	\$5,515,001	\$32,376	\$42,466,658	\$31,902,489
Actual Base Dist Revenue	\$8,153,874	\$1,079,334	\$1,142,709	\$2,425,642	\$5,156	\$9,685,559	\$4,572,282	\$4,270,243	\$43,532	\$31,378,332	\$21,002,415
Under-recovery	\$ (48,777)	\$6,387	\$ (145,862)	\$ (1,104,832)	\$ (2,034)	\$ (4,287,918)	\$ (4,271,688)	\$ (1,244,758)	\$11,156	\$ (11,088,326)	\$ (10,900,075)
% Under-recovered	-0.6%	0.6%	-11.3%	-31.3%	-28.3%	-30.7%	-48.3%	-22.6%	34.5%	-26.1%	-34.2%
Mar - Aug 2020											
Authorized Revenue	\$41,322,717	\$5,391,591	\$6,860,854	\$15,999,596	\$32,453	\$67,916,512	\$42,213,099	\$26,345,773	\$209,479	\$206,292,075	\$152,716,913
Actual Base Dist Revenue	\$41,147,838	\$5,388,855	\$6,044,900	\$12,544,327	\$27,793	\$54,839,227	\$27,226,533	\$21,620,455	\$235,000	\$169,074,928	\$116,493,335
Under-recovery	\$ (174,878)	\$ (2,737)	\$ (815,954)	\$ (3,455,270)	\$ (4,660)	\$ (13,077,284)	\$ (14,986,567)	\$ (4,725,318)	\$25,520	\$ (37,217,147)	\$ (36,223,578)
% Under-recovered	-0.4%	-0.1%	-11.9%	-21.6%	-14.4%	-19.3%	-35.5%	-17.9%	12.2%	-18.0%	-23.7%
Apr - Aug 2020											
Authorized Revenue	\$35,062,167	\$4,599,402	\$5,826,878	\$13,671,294	\$28,477	\$56,961,009	\$35,344,208	\$22,642,637	\$173,266	\$174,309,338	\$128,820,891
Actual Base Dist Revenue	\$34,845,234	\$4,586,854	\$5,030,593	\$10,266,807	\$23,943	\$44,786,338	\$22,269,201	\$17,953,478	\$158,928	\$139,921,377	\$95,458,696
Under-recovery	\$ (216,933)	\$ (12,548)	\$ (796,285)	\$ (3,404,487)	\$ (4,533)	\$ (12,174,671)	\$ (13,075,007)	\$ (4,689,159)	\$ (14,338)	\$ (34,387,961)	\$ (33,362,195)
% Under-recovered	-0.6%	-0.3%	-13.7%	-24.9%	-15.9%	-21.4%	-37.0%	-20.7%	-8.3%	-19.7%	-25.9%

Attachment A
Pepco's Responses to Data Requests
Formal Case No. 1156

AOBA's Response to Staff Data Request 3-3

AOBA's Response to Staff Data Request 3-5

Pepco's Response to AOBA Data Request 9-2

Pepco's Response to AOBA Data Request 9-3

Pepco's Response to AOBA Data Request 9-7

Pepco's Response to Staff Data Request 26-1

Pepco's Response to Staff Data Request 26-2

Pepco's Response to Staff Data Request 26-3

Pepco's Response to Staff Data Request 26-8

Pepco's Response to Staff Data Request 26-13

Pepco's Response to OPC Data Request 61-4

Pepco's Supplemental Response to OPC Data Request 61-16

**BEFORE THE
PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA**
Formal Case No. 1156

**Apartment and Office Building Association
Response to Commission Staff
Data Request No. 3**

Commission Staff Request

July 31, 2020

- 3-3. Please refer to AOBA (4A), page 5, line 23 to page 6, line 14. Using the latest revised version of Pepco's rate designs and billing determinants, please provide examples that indicate increases or decreases in the distribution portion of the bills for customers for each of the rate schedules listed. Please include all riders, surcharge or credits and the BSA in your analysis of distribution charges under the Company's Enhanced MRP Proposal.

AOBA Response

August 7, 2020

With the expenditure of considerable incremental effort and costs for a proceeding that has already become inordinately expensive for AOBA as a non-publicly funded intervenor, AOBA has endeavored to be as responsive as possible to Staff's request.

Attached are two electronic spreadsheet files in MS Excel format. **Attachment A** provides a revised version of the Bill Impact Analyses for Pepco's Enhanced MRP rates that were presented in Pepco's Revised Exhibit (5F)-7. **Attachment B** provides an assessment of the increases that each class would experience over the Company's **currently approved rates** for each year of Pepco's original MRP and for each year of the Company's MRP Enhanced Proposal.

Attachment A to this response (which is provided in PDF format for the summary bill comparison pages and with electronic spreadsheet file supporting calculations) compares the Company's allegedly **CORRECTED** MRP and Enhanced MRP ("E-MRP") charges for each Rate Year, as shown in Witness Blazunas' Exhibit Pepco (6F)-22 that was filed July 31, 2020, with revenues at the Company's currently approved charges applied to Pepco's forecasted billing determinants for the respective Rate Year. It also shows the Company's proposed changes in base rate charges and base rate distribution revenues by rate class for Rate Year 3 **with** and **without** Rider ERR Credits included. For each Rate Year, each rate class, and each MRP scenario (Original and Enhanced), the increases computed represent the difference between Pepco's **current authorized rates** and the Company's **proposed rates** for the identified Rate Year.

Contrary to Pepco's representations regarding a "*rate freeze*," the overall base rate revenues for the **MGT-LV** and **GT-LV** classes under the Company's **CORRECTED** Enhanced MRP increase by **11.0%** and **17.3%** respectively over current rates in **Rate Year 1**. For Rate Year 2 base rate revenues billed to those classes increase 12.4% and 19% respectively, over the Company's currently approved rates (using the Pepco's

**BEFORE THE
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forecasted billing determinants for Rate Year 2 to compute revenues under both current and proposed rates).

A summary of the rate comparisons presented in Exhibit Pepco (6F)-22, Attachment E, filed July 31, 2020 is provided below.

**Rate Comparisons Actually Presented
In Pepco Exhibit (6F)-22, Attachment E**

	<u>Rate Year 1 Analysis</u>		<u>Rate Year 2 Analysis</u>		<u>Rate Year 3 Analysis</u>	
	Current	Proposed	Current	Proposed	Current	Proposed
Residential	PRY1	PRY1	PRY2	PRY2	Adj PRY2	PRY3-ERR
MMA	PRY1	PRY1	PRY2	PRY2	Adj PRY2	PRY3-ERR
GSND	PRY1	PRY1	PRY2	PRY2	Adj PRY2	PRY3-ERR
GSD-LV	PRY1	PRY1	PRY2	PRY2	Adj PRY2	PRY3-ERR
MGT-LV	PRY1	PRY1	PRY2	PRY2	Adj PRY2	PRY3-ERR
GT-LV	PRY1	PRY1	PRY2	PRY2	Adj PRY2	PRY3-ERR
GT-3A	PRY1	PRY1	PRY2	PRY2	Adj PRY2	PRY3-ERR
GT-3B	PRY1	PRY1	PRY2	PRY2	Adj PRY2	PRY3-ERR

PRY1 = Pepco's Proposed Rate Year 1 base rate charges without adjustment

PRY2 = Pepco's Proposed Rate Year 2 base rate charges without adjustment

Adj PRY2 = Pepco's Proposed Rate Year 2 base rate charges with kWh rates adjusted to included **Imputed** BSA charges

PRY3-ERR = Pepco's Proposed Rate Year 2 base rate charges less proposed ERR Rider credits

The Commission should also take note of certain anomalies that appear in the detail of Pepco's Revised MRP Enhanced Bill Impact Analyses. For example, the ERR Rider Credits that Pepco proposes for Rate Schedule GT-3B result in that customer receiving rate credits in 2022 that exceed the total amount of base rate revenue Pepco currently receives from that class. Thus, combining the Company's proposed Rate Year 3 charges for Rate Schedule GT-3B with its proposed ERR Rider Credits would yield **negative** base rate charges for GT-3B service in calendar year 2022. Similarly, the ERR Credits proposed for MMA customers total \$4.8 million for 2022, but the Company's proposed rate increase for MMA service over the entire MRP period is only \$2.8 million. This suggests that the proposed rate relief for MMA customers far exceeds the rate increase proposed for those customers. These observations challenge the credibility of Pepco's

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entire ERR proposal and the manner in which it has distributed ERR credits among rate classes.

Attachment B to this response provides a revised version of Pepco's Bill Impact Analysis **excluding** Pepco's "**Imputed**" BSA adjustments. In this analysis revenue from the Company's currently approved (FC 1150) rates and the Company's proposed rates for each Rate Year are computed using Pepco's forecasted billing determinants for the Rate Year for which the proposed rates would be applicable. In this manner the cumulative impact of the Company's rate proposals over the MRP years can be more readily observed.

Not surprisingly, the **exclusion** of Pepco's "**Imputed**" BSA adjustments to current rates produces noticeable bill impacts in Rate Years 1 and 2 for nearly all rate classes, with particularly notable increases for customers in the Company's GT-LV and MGT-LV rate classes. The Rate Year 3 analyses for Pepco's MRP Enhanced ("E-MRP") proposal also shows the overall base rate revenue impacts by class with and without inclusion of ERR Rider Credits. With ERR Rider Credits considered, three classes (GT-3B, GS-3A, and MMA) are shown to have double digit reductions in their base rate charges. By contrast, the GT-LV and MGT-LV classes which already provide substantially above system average rates of return and who have been hit hard by Covid-19 restrictions would see the **largest** rate impacts. Even after the proposed ERR Credits, the GT-LV class would see a net increase over current rates of **36.1%**. The MGT-LV class would experience a net rate increase after ERR Credits of **32.7%**.

In the Bill Impact Analyses as presented in Exhibits Pepco (F)-7, (F)-15, (2F)-7, (2F)-15, and (5F)-7, the Company has included "**imputed**" (not actual) **BSA** amounts in **current rates** but **excludes** BSA charges from bills computed at **proposed rates**. That yields an **unbalanced** and inappropriate Bill Impact Analyses. For each rate class, Pepco sets it's "**imputed**" BSA adder to base rate charges to precisely offset the Company's proposed increases in base rate distribution charges, and thereby, providing greatly misleading impressions that rates will be *frozen* and customers will see no increases in their bills for Rate Years 1 and 2.

In the Bill Impact Analyses presented in Exhibit Pepco (6F)-22, Attachment E, Pepco zeroed-out all of its previously "**imputed**" **BSA Adjustments** to current rates. However, it achieves the appearance of no increases in Rate Years 1 and 2 by comparing its proposed rates **against themselves** for each year. In other words, Pepco uses its **proposed** Rate Year 1 base rate charges (without adjustment) to represent both its **Current** rates and its **Proposed** rates for Year 1. Similarly, Pepco uses its **proposed** Rate Year 2 base rate charges (without adjustment) to represent both its **Current** rates

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and its **Proposed** rates for Year 2. (Although Pepco's most recent electronic workpapers continue to use headings that say "Includes Imputed BSA," the column labeled "Imputed FC 1150 BSA" is now consistently blank.) The Commission should also be cautioned that Bill Impact Analysis exhibit pages, which purport to compare "MRP RY 1 RATES" with "MRP RY2 RATES," actually compare the Company's **Rate Year 2 MRP Rates** with its **Rate Year 2 MRP Rates**. In other words, the Company's Bill Impact Analyses for Rate Years 1 and 2 are tautological. They show no increase in charges because they compare the proposed rates against themselves.

The Company's Bill Impact Analyses in Exhibit Pepco (6F)-22, Attachment E, for Rate Year 3, use a **different methodology**. Pepco's Rate Year 3 Bill Impact Analyses actually compare Pepco's proposed Rate Year 2 base rate charges that have been modified to incorporate imputed BSA amounts with Pepco's proposed Rate Year 3 MRP Enhanced base rate charges less proposed ERR Rider Credits by rate class.

Witness Blazunas' MRP and E-MRP rate design exhibits (i.e., Pepco (F)-6, (F)-14, (4F)-6, as well as the July 31, 2020 Revised versions of Exhibit Pepco (4F)-6 and (5F)-6) also use amounts for each rate class on lines labeled "Bill Stabilization Adjustment" that are chosen to precisely offset the increased revenues that the Company would obtain through increased kWh charges. Thus, the BSA adjustments to base rates and to Base Rate Revenue have no foundation in the Company's BSA tariff provisions. In fact, the Bill Stabilization Adjustment amounts used in Pepco's Bill Impact Analyses and rate design exhibits do not conform to the limitations included in the Company's BSA Rider. For example, Witness Blazunas CORRECTED MRP Enhanced rate design exhibit (Exhibit Pepco (6F)-22, page 123 of 344, also identified as Attachment D to Staff DR 24-24) shows **Rate Year 1** a "**Bill Stabilization Adjustment**" for the **GT-LV** rate class of **\$(11,915,688)**. By comparison, the total revenue from base rate distribution charges for the GT-LV class for Rate Year 1 at **present rates** is **\$64,108,650**. In other words, the Bill Stabilization Adjustment that Pepco shows for the GT-LV class for Rate Year 1 equates to **18.6%** of the classes revenue at present rates. That is well in excess of the **10% cap** on BSA rate adjustments that is set forth in the Pepco's tariff.

In summary, the analyses presented in **Attachments A and B** to this response demonstrate that the base rate charges for each rate class **change** in each rate year. Thus, contrary to Pepco's representations rates in Rate Years 1 and 2 are not "**frozen**." If Pepco's MRP Enhanced Proposal is approved, base rate charges for distribution service will increase immediately upon implementation for several classes. It should also be apparent that Pepco cannot be relied upon to provide fair, transparent, and objective assessments of bill impacts.

Sponsor: **Bruce R. Oliver**

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "R" - Rate Year 1
DISTRICT OF COLUMBIA**

KWH	CURRENT RATES				MRP RY1 RATES				INCREASE					
	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)	(\$)	(%)
	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	ANNUAL	ANNUAL
0	17.03	17.11	-	-	17.03	17.11	-	-	0.00	0.00	0.00%	0.00%	0.00	0.00%
10	17.30	17.38	1.72967	1.73767	17.29	17.37	1.72914	1.73714	-0.01	-0.01	-0.06%	-0.06%	-0.01	-0.06%
20	17.56	17.64	0.87817	0.88217	17.55	17.63	0.87764	0.88164	-0.01	-0.01	-0.06%	-0.06%	-0.01	-0.06%
30	17.83	17.91	0.59433	0.59700	17.81	17.89	0.59381	0.59647	-0.02	-0.02	-0.11%	-0.11%	-0.02	-0.11%
40	18.75	18.86	0.46878	0.47144	18.73	18.84	0.46826	0.47091	-0.02	-0.02	-0.11%	-0.11%	-0.02	-0.11%
50	19.67	19.81	0.39345	0.39611	19.65	19.78	0.39293	0.39558	-0.03	-0.03	-0.15%	-0.15%	-0.03	-0.15%
100	24.28	24.54	0.24279	0.24544	24.23	24.49	0.24227	0.24491	-0.05	-0.05	-0.21%	-0.20%	-0.05	-0.20%
200	33.49	34.02	0.16747	0.17010	33.39	33.91	0.16694	0.16957	-0.11	-0.11	-0.33%	-0.32%	-0.11	-0.33%
300	42.71	43.50	0.14236	0.14499	42.55	43.34	0.14183	0.14446	-0.16	-0.16	-0.37%	-0.37%	-0.16	-0.37%
400	51.92	52.97	0.12980	0.13243	51.71	52.76	0.12927	0.13191	-0.21	-0.21	-0.40%	-0.40%	-0.21	-0.40%
500	62.51	63.18	0.12501	0.12637	62.15	62.87	0.12429	0.12574	-0.36	-0.32	-0.58%	-0.51%	-0.34	-0.54%
692	82.83	82.79	0.11970	0.11964	82.18	82.27	0.11876	0.11889	-0.65	-0.52	-0.78%	-0.63%	-0.57	-0.69%
700	83.68	83.61	0.11954	0.11944	83.02	83.08	0.11859	0.11869	-0.66	-0.53	-0.79%	-0.63%	-0.58	-0.70%
750	88.97	88.71	0.11863	0.11829	88.23	88.14	0.11764	0.11751	-0.74	-0.58	-0.83%	-0.65%	-0.65	-0.73%
800	94.26	93.82	0.11783	0.11727	93.45	93.19	0.11681	0.11649	-0.81	-0.63	-0.86%	-0.67%	-0.71	-0.75%
850	99.56	98.93	0.11712	0.11638	98.67	98.24	0.11608	0.11558	-0.89	-0.68	-0.89%	-0.69%	-0.77	-0.77%
900	104.85	104.03	0.11650	0.11559	103.89	103.30	0.11543	0.11477	-0.96	-0.74	-0.92%	-0.71%	-0.83	-0.80%
950	110.14	109.14	0.11594	0.11488	109.10	108.35	0.11485	0.11405	-1.04	-0.79	-0.94%	-0.72%	-0.89	-0.82%
1,000	115.43	114.24	0.11543	0.11424	114.32	113.40	0.11432	0.11340	-1.11	-0.84	-0.96%	-0.74%	-0.95	-0.83%
1,250	141.90	139.77	0.11352	0.11182	140.41	138.67	0.11233	0.11094	-1.49	-1.10	-1.05%	-0.79%	-1.26	-0.90%
1,500	168.36	165.30	0.11224	0.11020	166.50	163.94	0.11100	0.10929	-1.86	-1.36	-1.10%	-0.82%	-1.57	-0.94%
1,750	194.83	190.83	0.11133	0.10905	192.59	189.20	0.11005	0.10812	-2.24	-1.63	-1.15%	-0.85%	-1.88	-0.98%
2,000	221.29	216.36	0.11064	0.10818	218.67	214.47	0.10934	0.10723	-2.61	-1.89	-1.18%	-0.87%	-2.19	-1.00%
2,250	247.75	241.89	0.11011	0.10751	244.76	239.74	0.10878	0.10655	-2.99	-2.15	-1.21%	-0.89%	-2.50	-1.02%
2,500	274.22	267.42	0.10969	0.10697	270.85	265.00	0.10834	0.10600	-3.37	-2.41	-1.23%	-0.90%	-2.81	-1.04%
3,000	327.15	318.47	0.10905	0.10616	323.03	315.54	0.10768	0.10518	-4.12	-2.94	-1.26%	-0.92%	-3.43	-1.07%
3,500	380.07	369.53	0.10859	0.10558	375.20	366.07	0.10720	0.10459	-4.87	-3.46	-1.28%	-0.94%	-4.05	-1.08%
4,000	433.00	420.59	0.10825	0.10515	427.38	416.60	0.10685	0.10415	-5.62	-3.99	-1.30%	-0.95%	-4.67	-1.10%
5,000	538.86	522.71	0.10777	0.10454	531.73	517.67	0.10635	0.10353	-7.12	-5.04	-1.32%	-0.96%	-5.91	-1.12%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "MMA" - Rate Year 1
DISTRICT OF COLUMBIA**

KWH	CURRENT RATES				MRP RY1 RATES				INCREASE					
	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)	(\$)	(%)
	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	ANNUAL	ANNUAL
0	13.57	13.99	-	-	13.57	13.99	-	-	0.00	0.00	0.00%	0.00%	0.00	0.00%
100	20.20	21.58	0.20200	0.21585	20.28	21.67	0.20285	0.21669	0.08	0.08	0.40%	0.37%	0.08	0.38%
200	28.57	31.33	0.14283	0.15665	28.74	31.50	0.14368	0.15749	0.17	0.17	0.60%	0.54%	0.17	0.56%
300	36.93	41.07	0.12311	0.13691	37.19	41.33	0.12396	0.13776	0.25	0.25	0.68%	0.61%	0.25	0.64%
400	45.30	50.82	0.11325	0.12705	45.64	51.16	0.11410	0.12789	0.34	0.34	0.75%	0.67%	0.34	0.70%
500	54.92	61.23	0.10983	0.12246	55.50	61.74	0.11099	0.12348	0.58	0.51	1.06%	0.83%	0.54	0.92%
1000	103.00	113.29	0.10300	0.11329	104.79	114.64	0.10479	0.11464	1.79	1.35	1.74%	1.19%	1.53	1.41%
2000	199.17	217.42	0.09958	0.10871	203.37	220.45	0.10168	0.11023	4.20	3.03	2.11%	1.39%	3.52	1.68%
3000	295.33	321.55	0.09844	0.10718	301.95	326.26	0.10065	0.10875	6.62	4.72	2.24%	1.47%	5.51	1.77%
4000	391.50	425.67	0.09787	0.10642	400.53	432.07	0.10013	0.10802	9.03	6.40	2.31%	1.50%	7.50	1.82%
5000	487.66	529.80	0.09753	0.10596	499.11	537.88	0.09982	0.10758	11.45	8.09	2.35%	1.53%	9.49	1.85%
6000	583.83	633.92	0.09730	0.10565	597.69	643.69	0.09961	0.10728	13.86	9.77	2.37%	1.54%	11.47	1.87%
7000	679.99	738.05	0.09714	0.10544	696.27	749.50	0.09947	0.10707	16.27	11.46	2.39%	1.55%	13.46	1.89%
7500	728.08	790.11	0.09708	0.10535	745.56	802.41	0.09941	0.10699	17.48	12.30	2.40%	1.56%	14.46	1.89%
8000	776.16	842.17	0.09702	0.10527	794.85	855.31	0.09936	0.10691	18.69	13.14	2.41%	1.56%	15.45	1.90%
8500	824.24	894.24	0.09697	0.10520	844.14	908.22	0.09931	0.10685	19.90	13.98	2.41%	1.56%	16.45	1.90%
9000	872.32	946.30	0.09692	0.10514	893.43	961.13	0.09927	0.10679	21.10	14.83	2.42%	1.57%	17.44	1.91%
9500	920.41	998.36	0.09689	0.10509	942.72	1,014.03	0.09923	0.10674	22.31	15.67	2.42%	1.57%	18.44	1.91%
10000	968.49	1,050.43	0.09685	0.10504	992.01	1,066.94	0.09920	0.10669	23.52	16.51	2.43%	1.57%	19.43	1.91%
12500	1,208.90	1,310.74	0.09671	0.10486	1,238.46	1,331.46	0.09908	0.10652	29.55	20.72	2.44%	1.58%	24.40	1.92%
15000	1,449.32	1,571.05	0.09662	0.10474	1,484.91	1,595.99	0.09899	0.10640	35.59	24.93	2.46%	1.59%	29.37	1.93%
17500	1,689.73	1,831.37	0.09656	0.10465	1,731.36	1,860.51	0.09893	0.10631	41.63	29.14	2.46%	1.59%	34.34	1.94%
20000	1,930.15	2,091.68	0.09651	0.10458	1,977.81	2,125.04	0.09889	0.10625	47.66	33.36	2.47%	1.59%	39.32	1.94%
22500	2,170.56	2,352.00	0.09647	0.10453	2,224.26	2,389.56	0.09886	0.10620	53.70	37.57	2.47%	1.60%	44.29	1.95%
25000	2,410.98	2,612.31	0.09644	0.10449	2,470.71	2,654.09	0.09883	0.10616	59.74	41.78	2.48%	1.60%	49.26	1.95%
30000	2,891.80	3,132.94	0.09639	0.10443	2,963.61	3,183.14	0.09879	0.10610	71.81	50.20	2.48%	1.60%	59.20	1.95%
35000	3,372.63	3,653.57	0.09636	0.10439	3,456.51	3,712.19	0.09876	0.10606	83.88	58.62	2.49%	1.60%	69.15	1.96%
40000	3,853.46	4,174.20	0.09634	0.10435	3,949.42	4,241.24	0.09874	0.10603	95.95	67.05	2.49%	1.61%	79.09	1.96%
50000	4,815.12	5,215.45	0.09630	0.10431	4,935.22	5,299.34	0.09870	0.10599	120.10	83.89	2.49%	1.61%	98.98	1.96%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GS ND" - Rate Year 1
DISTRICT OF COLUMBIA**

KWH	CURRENT RATES				MRP RY1 RATES				INCREASE					
	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)	(\$)	(%)
	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	ANNUAL	ANNUAL
0	27.42	27.42	-	-	27.42	27.42	-	-	0.00	0.00	0.00%	0.00%	0.00	0.00%
10	28.63	28.56	2.86266	2.85604	28.66	28.58	2.86573	2.85844	0.03	0.02	0.10%	0.07%	0.02	0.08%
20	29.83	29.70	1.49166	1.48504	29.89	29.75	1.49473	1.48744	0.06	0.05	0.20%	0.17%	0.05	0.18%
30	31.04	30.84	1.03466	1.02804	31.13	30.91	1.03773	1.03044	0.09	0.07	0.29%	0.23%	0.08	0.25%
40	32.25	31.98	0.80616	0.79954	32.37	32.08	0.80923	0.80194	0.12	0.10	0.37%	0.31%	0.11	0.34%
50	33.45	33.12	0.66906	0.66244	33.61	33.24	0.67213	0.66484	0.15	0.12	0.45%	0.36%	0.13	0.40%
100	39.49	38.82	0.39486	0.38824	39.79	39.06	0.39793	0.39064	0.31	0.24	0.79%	0.62%	0.27	0.69%
150	45.52	44.53	0.30346	0.29684	45.98	44.89	0.30653	0.29924	0.46	0.36	1.01%	0.81%	0.40	0.89%
200	51.55	50.23	0.25776	0.25114	52.17	50.71	0.26083	0.25354	0.61	0.48	1.18%	0.96%	0.53	1.05%
250	57.58	55.93	0.23034	0.22372	58.35	56.53	0.23341	0.22612	0.77	0.60	1.34%	1.07%	0.67	1.18%
300	63.62	61.63	0.21206	0.20544	64.54	62.35	0.21513	0.20784	0.92	0.72	1.45%	1.17%	0.80	1.29%
400	75.68	73.03	0.18921	0.18259	76.91	74.00	0.19228	0.18499	1.23	0.96	1.63%	1.31%	1.07	1.45%
500	87.75	84.44	0.17550	0.16888	89.28	85.64	0.17857	0.17128	1.53	1.20	1.74%	1.42%	1.34	1.56%
600	99.81	95.84	0.16636	0.15974	101.66	97.28	0.16943	0.16214	1.84	1.44	1.84%	1.50%	1.61	1.65%
700	111.88	107.25	0.15983	0.15321	114.03	108.93	0.16290	0.15561	2.15	1.68	1.92%	1.57%	1.88	1.72%
800	123.94	118.65	0.15493	0.14831	126.40	120.57	0.15800	0.15071	2.46	1.92	1.98%	1.62%	2.15	1.77%
900	136.01	130.05	0.15112	0.14450	138.77	132.22	0.15419	0.14691	2.76	2.16	2.03%	1.66%	2.41	1.82%
1,000	148.08	141.46	0.14808	0.14146	151.15	143.86	0.15115	0.14386	3.07	2.40	2.07%	1.70%	2.68	1.86%
1,250	178.24	169.97	0.14259	0.13597	182.08	172.97	0.14566	0.13838	3.84	3.00	2.15%	1.77%	3.35	1.93%
1,500	208.40	198.47	0.13894	0.13232	213.01	202.08	0.14201	0.13472	4.60	3.60	2.21%	1.81%	4.02	1.98%
1,750	238.57	226.98	0.13632	0.12970	243.94	231.19	0.13939	0.13211	5.37	4.21	2.25%	1.85%	4.69	2.02%
2,000	268.73	255.49	0.13437	0.12775	274.87	260.30	0.13744	0.13015	6.14	4.81	2.28%	1.88%	5.36	2.06%
2,500	329.06	312.51	0.13162	0.12500	336.73	318.52	0.13469	0.12741	7.67	6.01	2.33%	1.92%	6.70	2.10%
3,000	389.39	369.53	0.12980	0.12318	398.60	376.74	0.13287	0.12558	9.21	7.21	2.37%	1.95%	8.04	2.13%
3,500	449.72	426.55	0.12849	0.12187	460.46	434.96	0.13156	0.12427	10.74	8.41	2.39%	1.97%	9.38	2.15%
4,000	510.04	483.56	0.12751	0.12089	522.32	493.18	0.13058	0.12329	12.28	9.61	2.41%	1.99%	10.72	2.17%
5,000	630.70	597.60	0.12614	0.11952	646.05	609.62	0.12921	0.12192	15.35	12.02	2.43%	2.01%	13.41	2.19%
6,000	751.36	711.64	0.12523	0.11861	769.78	726.06	0.12830	0.12101	18.42	14.42	2.45%	2.03%	16.09	2.21%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GS D LV" - Rate Year 1
DISTRICT OF COLUMBIA**

KW	Hours	KWH	CURRENT RATES				MRP RY1 RATES				INCREASE			
			\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
			SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
10	100	1000	220.28	227.20	0.22028	0.22720	224.46	230.37	0.22446	0.23037	4.18	3.17	1.90%	1.40%
	200	2000	330.28	344.12	0.16514	0.17206	338.65	350.46	0.16933	0.17523	8.37	6.34	2.53%	1.84%
	300	3000	440.29	461.05	0.14676	0.15368	452.84	470.56	0.15095	0.15685	12.55	9.51	2.85%	2.06%
	400	4000	550.30	577.98	0.13757	0.14449	567.03	590.66	0.14176	0.14766	16.74	12.68	3.04%	2.19%
	500	5000	660.30	694.90	0.13206	0.13898	681.22	710.75	0.13624	0.14215	20.92	15.85	3.17%	2.28%
	600	6000	770.31	811.83	0.12838	0.13530	795.41	830.85	0.13257	0.13847	25.10	19.02	3.26%	2.34%
25	100	2,500	497.94	515.24	0.19917	0.20609	508.40	523.16	0.20336	0.20926	10.46	7.92	2.10%	1.54%
	200	5,000	772.95	807.55	0.15459	0.16151	793.87	823.40	0.15877	0.16468	20.92	15.85	2.71%	1.96%
	300	7,500	1,047.97	1,099.87	0.13973	0.14665	1,079.35	1,123.64	0.14391	0.14982	31.38	23.77	2.99%	2.16%
	400	10,000	1,322.98	1,392.18	0.13230	0.13922	1,364.82	1,423.88	0.13648	0.14239	41.84	31.70	3.16%	2.28%
	500	12,500	1,598.00	1,684.50	0.12784	0.13476	1,650.30	1,724.12	0.13202	0.13793	52.30	39.62	3.27%	2.35%
	600	15,000	1,873.01	1,976.81	0.12487	0.13179	1,935.77	2,024.36	0.12905	0.13496	62.76	47.55	3.35%	2.41%
50	100	5,000	960.70	995.30	0.19214	0.19906	981.62	1,011.15	0.19632	0.20223	20.92	15.85	2.18%	1.59%
	200	10,000	1,510.73	1,579.93	0.15107	0.15799	1,552.57	1,611.63	0.15526	0.16116	41.84	31.70	2.77%	2.01%
	300	15,000	2,060.76	2,164.56	0.13738	0.14430	2,123.52	2,212.11	0.14157	0.14747	62.76	47.55	3.05%	2.20%
	400	20,000	2,610.80	2,749.20	0.13054	0.13746	2,694.48	2,812.60	0.13472	0.14063	83.68	63.40	3.21%	2.31%
	500	25,000	3,160.83	3,333.83	0.12643	0.13335	3,265.43	3,413.08	0.13062	0.13652	104.60	79.25	3.31%	2.38%
	600	30,000	3,710.86	3,918.46	0.12370	0.13062	3,836.38	4,013.56	0.12788	0.13379	125.52	95.10	3.38%	2.43%
75	100	7,500	1,423.47	1,475.37	0.18980	0.19672	1,454.85	1,499.14	0.19398	0.19989	31.38	23.77	2.20%	1.61%
	200	15,000	2,248.51	2,352.31	0.14990	0.15682	2,311.27	2,399.86	0.15408	0.15999	62.76	47.55	2.79%	2.02%
	300	22,500	3,073.56	3,229.26	0.13660	0.14352	3,167.70	3,300.59	0.14079	0.14669	94.14	71.32	3.06%	2.21%
	400	30,000	3,898.61	4,106.21	0.12995	0.13687	4,024.13	4,201.31	0.13414	0.14004	125.52	95.10	3.22%	2.32%
	500	37,500	4,723.66	4,983.16	0.12596	0.13288	4,880.56	5,102.03	0.13015	0.13605	156.90	118.87	3.32%	2.39%
	600	45,000	5,548.70	5,860.10	0.12330	0.13022	5,736.98	6,002.75	0.12749	0.13339	188.28	142.65	3.39%	2.43%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "MGT LV " - Rate Year 1
DISTRICT OF COLUMBIA**

HOURS USE	KWH	CURRENT RATES				MRP RY1 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
MAXIMUM AND ON PEAK DEMAND = 25 KW													
200	5,000	859.51	859.51	0.17190	0.17190	884.24	884.24	0.17685	0.17685	24.73	24.73	2.88%	2.88%
300	7,500	922.75	922.75	0.12303	0.12303	959.85	959.85	0.12798	0.12798	37.10	37.10	4.02%	4.02%
400	10,000	986.00	986.00	0.09860	0.09860	1,035.46	1,035.46	0.10355	0.10355	49.46	49.46	5.02%	5.02%
500	12,500	1,049.25	1,049.25	0.08394	0.08394	1,111.08	1,111.08	0.08889	0.08889	61.83	61.83	5.89%	5.89%
600	15,000	1,112.50	1,112.50	0.07417	0.07417	1,186.69	1,186.69	0.07911	0.07911	74.19	74.19	6.67%	6.67%
50 KW													
200	10,000	1,262.25	1,262.25	0.12623	0.12623	1,311.71	1,311.71	0.13117	0.13117	49.46	49.46	3.92%	3.92%
300	15,000	1,388.75	1,388.75	0.09258	0.09258	1,462.94	1,462.94	0.09753	0.09753	74.19	74.19	5.34%	5.34%
400	20,000	1,515.24	1,515.24	0.07576	0.07576	1,614.17	1,614.17	0.08071	0.08071	98.92	98.92	6.53%	6.53%
500	25,000	1,641.74	1,641.74	0.06567	0.06567	1,765.40	1,765.40	0.07062	0.07062	123.66	123.66	7.53%	7.53%
600	30,000	1,768.24	1,768.24	0.05894	0.05894	1,916.62	1,916.62	0.06389	0.06389	148.39	148.39	8.39%	8.39%
75 KW													
200	15,000	1,665.00	1,665.00	0.11100	0.11100	1,739.19	1,739.19	0.11595	0.11595	74.19	74.19	4.46%	4.46%
300	22,500	1,854.74	1,854.74	0.08243	0.08243	1,966.03	1,966.03	0.08738	0.08738	111.29	111.29	6.00%	6.00%
400	30,000	2,044.49	2,044.49	0.06815	0.06815	2,192.87	2,192.87	0.07310	0.07310	148.39	148.39	7.26%	7.26%
500	37,500	2,234.23	2,234.23	0.05958	0.05958	2,419.71	2,419.71	0.06453	0.06453	185.48	185.48	8.30%	8.30%
600	45,000	2,423.97	2,423.97	0.05387	0.05387	2,646.55	2,646.55	0.05881	0.05881	222.58	222.58	9.18%	9.18%
100 KW													
200	20,000	2,067.74	2,067.74	0.10339	0.10339	2,166.67	2,166.67	0.10833	0.10833	98.92	98.92	4.78%	4.78%
300	30,000	2,320.74	2,320.74	0.07736	0.07736	2,469.12	2,469.12	0.08230	0.08230	148.39	148.39	6.39%	6.39%
400	40,000	2,573.73	2,573.73	0.06434	0.06434	2,771.58	2,771.58	0.06929	0.06929	197.85	197.85	7.69%	7.69%
500	50,000	2,826.72	2,826.72	0.05653	0.05653	3,074.03	3,074.03	0.06148	0.06148	247.31	247.31	8.75%	8.75%
600	60,000	3,079.71	3,079.71	0.05133	0.05133	3,376.49	3,376.49	0.05627	0.05627	296.77	296.77	9.64%	9.64%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "MGT LV " - Rate Year 1
DISTRICT OF COLUMBIA**

HOURS USE	KWH	CURRENT RATES				MRP RY1 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
MAXIMUM AND ON PEAK DEMAND = 200 KW													
200	40,000	3,678.73	3,678.73	0.09197	0.09197	3,876.58	3,876.58	0.09691	0.09691	197.85	197.85	5.38%	5.38%
300	60,000	4,184.71	4,184.71	0.06975	0.06975	4,481.49	4,481.49	0.07469	0.07469	296.77	296.77	7.09%	7.09%
400	80,000	4,690.70	4,690.70	0.05863	0.05863	5,086.39	5,086.39	0.06358	0.06358	395.70	395.70	8.44%	8.44%
500	100,000	5,196.68	5,196.68	0.05197	0.05197	5,691.30	5,691.30	0.05691	0.05691	494.62	494.62	9.52%	9.52%
600	120,000	5,702.66	5,702.66	0.04752	0.04752	6,296.21	6,296.21	0.05247	0.05247	593.55	593.55	10.41%	10.41%
400 KW													
200	80,000	6,900.70	6,900.70	0.08626	0.08626	7,296.39	7,296.39	0.09120	0.09120	395.70	395.70	5.73%	5.73%
300	120,000	7,912.66	7,912.66	0.06594	0.06594	8,506.21	8,506.21	0.07089	0.07089	593.55	593.55	7.50%	7.50%
400	160,000	8,924.63	8,924.63	0.05578	0.05578	9,716.03	9,716.03	0.06073	0.06073	791.40	791.40	8.87%	8.87%
500	200,000	9,936.60	9,936.60	0.04968	0.04968	10,925.85	10,925.85	0.05463	0.05463	989.25	989.25	9.96%	9.96%
600	240,000	10,948.57	10,948.57	0.04562	0.04562	12,135.66	12,135.66	0.05057	0.05057	1,187.10	1,187.10	10.84%	10.84%
600 KW													
200	120,000	10,122.66	10,122.66	0.08436	0.08436	10,716.21	10,716.21	0.08930	0.08930	593.55	593.55	5.86%	5.86%
300	180,000	11,640.62	11,640.62	0.06467	0.06467	12,530.94	12,530.94	0.06962	0.06962	890.32	890.32	7.65%	7.65%
400	240,000	13,158.57	13,158.57	0.05483	0.05483	14,345.66	14,345.66	0.05977	0.05977	1,187.10	1,187.10	9.02%	9.02%
500	300,000	14,676.52	14,676.52	0.04892	0.04892	16,160.39	16,160.39	0.05387	0.05387	1,483.87	1,483.87	10.11%	10.11%
600	360,000	16,194.47	16,194.47	0.04498	0.04498	17,975.12	17,975.12	0.04993	0.04993	1,780.64	1,780.64	11.00%	11.00%
800 KW													
200	160,000	13,344.63	13,344.63	0.08340	0.08340	14,136.03	14,136.03	0.08835	0.08835	791.40	791.40	5.93%	5.93%
300	240,000	15,368.57	15,368.57	0.06404	0.06404	16,555.66	16,555.66	0.06898	0.06898	1,187.10	1,187.10	7.72%	7.72%
400	320,000	17,392.50	17,392.50	0.05435	0.05435	18,975.30	18,975.30	0.05930	0.05930	1,582.80	1,582.80	9.10%	9.10%
500	400,000	19,416.44	19,416.44	0.04854	0.04854	21,394.93	21,394.93	0.05349	0.05349	1,978.49	1,978.49	10.19%	10.19%
600	480,000	21,440.38	21,440.38	0.04467	0.04467	23,814.57	23,814.57	0.04961	0.04961	2,374.19	2,374.19	11.07%	11.07%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT LV " - Rate Year 1
DISTRICT OF COLUMBIA**

HOURS USE	KWH	CURRENT RATES				MRP RY1 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
MAXIMUM AND ON PEAK DEMAND = 100 KW													
200	20,000	2,067.74	2,067.74	0.10339	0.10339	2,203.21	2,203.21	0.11016	0.11016	135.46	135.46	6.55%	6.55%
300	30,000	2,320.74	2,320.74	0.07736	0.07736	2,523.93	2,523.93	0.08413	0.08413	203.19	203.19	8.76%	8.76%
400	40,000	2,573.73	2,573.73	0.06434	0.06434	2,844.65	2,844.65	0.07112	0.07112	270.92	270.92	10.53%	10.53%
500	50,000	2,826.72	2,826.72	0.05653	0.05653	3,165.37	3,165.37	0.06331	0.06331	338.65	338.65	11.98%	11.98%
600	60,000	3,079.71	3,079.71	0.05133	0.05133	3,486.10	3,486.10	0.05810	0.05810	406.38	406.38	13.20%	13.20%
300 KW													
200	60,000	5,289.71	5,289.71	0.08816	0.08816	5,696.10	5,696.10	0.09493	0.09493	406.38	406.38	7.68%	7.68%
300	90,000	6,048.69	6,048.69	0.06721	0.06721	6,658.26	6,658.26	0.07398	0.07398	609.58	609.58	10.08%	10.08%
400	120,000	6,807.66	6,807.66	0.05673	0.05673	7,620.43	7,620.43	0.06350	0.06350	812.77	812.77	11.94%	11.94%
500	150,000	7,566.64	7,566.64	0.05044	0.05044	8,582.60	8,582.60	0.05722	0.05722	1,015.96	1,015.96	13.43%	13.43%
600	180,000	8,325.62	8,325.62	0.04625	0.04625	9,544.77	9,544.77	0.05303	0.05303	1,219.15	1,219.15	14.64%	14.64%
500 KW													
200	100,000	8,511.68	8,511.68	0.08512	0.08512	9,188.99	9,188.99	0.09189	0.09189	677.31	677.31	7.96%	7.96%
300	150,000	9,776.64	9,776.64	0.06518	0.06518	10,792.60	10,792.60	0.07195	0.07195	1,015.96	1,015.96	10.39%	10.39%
400	200,000	11,041.60	11,041.60	0.05521	0.05521	12,396.22	12,396.22	0.06198	0.06198	1,354.62	1,354.62	12.27%	12.27%
500	250,000	12,306.56	12,306.56	0.04923	0.04923	13,999.83	13,999.83	0.05600	0.05600	1,693.27	1,693.27	13.76%	13.76%
600	300,000	13,571.52	13,571.52	0.04524	0.04524	15,603.44	15,603.44	0.05201	0.05201	2,031.92	2,031.92	14.97%	14.97%
1,000 KW													
200	200,000	16,566.60	16,566.60	0.08283	0.08283	17,921.22	17,921.22	0.08961	0.08961	1,354.62	1,354.62	8.18%	8.18%
300	300,000	19,096.52	19,096.52	0.06366	0.06366	21,128.44	21,128.44	0.07043	0.07043	2,031.92	2,031.92	10.64%	10.64%
400	400,000	21,626.44	21,626.44	0.05407	0.05407	24,335.67	24,335.67	0.06084	0.06084	2,709.23	2,709.23	12.53%	12.53%
500	500,000	24,156.36	24,156.36	0.04831	0.04831	27,542.90	27,542.90	0.05509	0.05509	3,386.54	3,386.54	14.02%	14.02%
600	600,000	26,686.28	26,686.28	0.04448	0.04448	30,750.13	30,750.13	0.05125	0.05125	4,063.85	4,063.85	15.23%	15.23%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT LV " - Rate Year 1
DISTRICT OF COLUMBIA**

HOURS USE	KWH	CURRENT RATES				MRP RY1 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
						MAXIMUM AND ON PEAK DEMAND = 2,000 KW							
200	400,000	32,676.44	32,676.44	0.08169	0.08169	35,385.67	35,385.67	0.08846	0.08846	2,709.23	2,709.23	8.29%	8.29%
300	600,000	37,736.28	37,736.28	0.06289	0.06289	41,800.13	41,800.13	0.06967	0.06967	4,063.85	4,063.85	10.77%	10.77%
400	800,000	42,796.12	42,796.12	0.05350	0.05350	48,214.58	48,214.58	0.06027	0.06027	5,418.46	5,418.46	12.66%	12.66%
500	1,000,000	47,855.96	47,855.96	0.04786	0.04786	54,629.04	54,629.04	0.05463	0.05463	6,773.08	6,773.08	14.15%	14.15%
600	1,200,000	52,915.80	52,915.80	0.04410	0.04410	61,043.49	61,043.49	0.05087	0.05087	8,127.69	8,127.69	15.36%	15.36%
										4,000 KW			
200	800,000	64,896.12	64,896.12	0.08112	0.08112	70,314.58	70,314.58	0.08789	0.08789	5,418.46	5,418.46	8.35%	8.35%
300	1,200,000	75,015.80	75,015.80	0.06251	0.06251	83,143.49	83,143.49	0.06929	0.06929	8,127.69	8,127.69	10.83%	10.83%
400	1,600,000	85,135.48	85,135.48	0.05321	0.05321	95,972.40	95,972.40	0.05998	0.05998	10,836.92	10,836.92	12.73%	12.73%
500	2,000,000	95,255.16	95,255.16	0.04763	0.04763	108,801.31	108,801.31	0.05440	0.05440	13,546.15	13,546.15	14.22%	14.22%
600	2,400,000	105,374.84	105,374.84	0.04391	0.04391	121,630.23	121,630.23	0.05068	0.05068	16,255.39	16,255.39	15.43%	15.43%
										6,000 KW			
200	1,200,000	97,115.80	97,115.80	0.08093	0.08093	105,243.49	105,243.49	0.08770	0.08770	8,127.69	8,127.69	8.37%	8.37%
300	1,800,000	112,295.32	112,295.32	0.06239	0.06239	124,486.86	124,486.86	0.06916	0.06916	12,191.54	12,191.54	10.86%	10.86%
400	2,400,000	127,474.84	127,474.84	0.05311	0.05311	143,730.23	143,730.23	0.05989	0.05989	16,255.39	16,255.39	12.75%	12.75%
500	3,000,000	142,654.36	142,654.36	0.04755	0.04755	162,973.59	162,973.59	0.05432	0.05432	20,319.23	20,319.23	14.24%	14.24%
600	3,600,000	157,833.88	157,833.88	0.04384	0.04384	182,216.96	182,216.96	0.05062	0.05062	24,383.08	24,383.08	15.45%	15.45%
										8,000 KW			
200	1,600,000	129,335.48	129,335.48	0.08083	0.08083	140,172.40	140,172.40	0.08761	0.08761	10,836.92	10,836.92	8.38%	8.38%
300	2,400,000	149,574.84	149,574.84	0.06232	0.06232	165,830.23	165,830.23	0.06910	0.06910	16,255.39	16,255.39	10.87%	10.87%
400	3,200,000	169,814.20	169,814.20	0.05307	0.05307	191,488.05	191,488.05	0.05984	0.05984	21,673.85	21,673.85	12.76%	12.76%
500	4,000,000	190,053.56	190,053.56	0.04751	0.04751	217,145.87	217,145.87	0.05429	0.05429	27,092.31	27,092.31	14.26%	14.26%
600	4,800,000	210,292.92	210,292.92	0.04381	0.04381	242,803.69	242,803.69	0.05058	0.05058	32,510.77	32,510.77	15.46%	15.46%

POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT 3A" - Rate Year 1
DISTRICT OF COLUMBIA

HOURS USE	KWH	CURRENT RATES				MRP RY1 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
						MAXIMUM AND ON PEAK DEMAND = 1,000 KW							
200	200,000	12,222.87	12,220.89	0.06111	0.06110	12,222.87	12,220.89	0.06111	0.06110	0.00	0.00	0.00%	0.00%
300	300,000	14,115.49	14,112.52	0.04705	0.04704	14,115.49	14,112.52	0.04705	0.04704	0.00	0.00	0.00%	0.00%
400	400,000	16,008.11	16,004.15	0.04002	0.04001	16,008.11	16,004.15	0.04002	0.04001	0.00	0.00	0.00%	0.00%
500	500,000	17,900.72	17,895.77	0.03580	0.03579	17,900.72	17,895.77	0.03580	0.03579	0.00	0.00	0.00%	0.00%
600	600,000	19,793.34	19,787.40	0.03299	0.03298	19,793.34	19,787.40	0.03299	0.03298	0.00	0.00	0.00%	0.00%
										2,000 KW			
200	400,000	24,258.11	24,254.15	0.06065	0.06064	24,258.11	24,254.15	0.06065	0.06064	0.00	0.00	0.00%	0.00%
300	600,000	28,043.34	28,037.40	0.04674	0.04673	28,043.34	28,037.40	0.04674	0.04673	0.00	0.00	0.00%	0.00%
400	800,000	31,828.57	31,820.65	0.03979	0.03978	31,828.57	31,820.65	0.03979	0.03978	0.00	0.00	0.00%	0.00%
500	1,000,000	35,613.80	35,603.91	0.03561	0.03560	35,613.80	35,603.91	0.03561	0.03560	0.00	0.00	0.00%	0.00%
600	1,200,000	39,399.04	39,387.16	0.03283	0.03282	39,399.04	39,387.16	0.03283	0.03282	0.00	0.00	0.00%	0.00%
										5,000 KW			
200	1,000,000	60,363.80	60,353.91	0.06036	0.06035	60,363.80	60,353.91	0.06036	0.06035	0.00	0.00	0.00%	0.00%
300	1,500,000	69,826.89	69,812.04	0.04655	0.04654	69,826.89	69,812.04	0.04655	0.04654	0.00	0.00	0.00%	0.00%
400	2,000,000	79,289.97	79,270.17	0.03964	0.03964	79,289.97	79,270.17	0.03964	0.03964	0.00	0.00	0.00%	0.00%
500	2,500,000	88,753.05	88,728.30	0.03550	0.03549	88,753.05	88,728.30	0.03550	0.03549	0.00	0.00	0.00%	0.00%
600	3,000,000	98,216.13	98,186.44	0.03274	0.03273	98,216.13	98,186.44	0.03274	0.03273	0.00	0.00	0.00%	0.00%
										7,500 KW			
200	1,500,000	90,451.89	90,437.04	0.06030	0.06029	90,451.89	90,437.04	0.06030	0.06029	0.00	0.00	0.00%	0.00%
300	2,250,000	104,646.51	104,624.24	0.04651	0.04650	104,646.51	104,624.24	0.04651	0.04650	0.00	0.00	0.00%	0.00%
400	3,000,000	118,841.13	118,811.44	0.03961	0.03960	118,841.13	118,811.44	0.03961	0.03960	0.00	0.00	0.00%	0.00%
500	3,750,000	133,035.75	132,998.64	0.03548	0.03547	133,035.75	132,998.64	0.03548	0.03547	0.00	0.00	0.00%	0.00%
600	4,500,000	147,230.38	147,185.83	0.03272	0.03271	147,230.38	147,185.83	0.03272	0.03271	0.00	0.00	0.00%	0.00%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT 3A" - Rate Year 1
DISTRICT OF COLUMBIA**

HOURS USE	KWH	PRESENT 'GT-3A'				PROPOSED 'GT- 3A'				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
						MAXIMUM AND ON PEAK DEMAND = 10,000 KW							
200	2,000,000	120,539.97	120,520.17	0.06027	0.06026	120,539.97	120,520.17	0.06027	0.06026	0.00	0.00	0.00%	0.00%
300	3,000,000	139,466.13	139,436.44	0.04649	0.04648	139,466.13	139,436.44	0.04649	0.04648	0.00	0.00	0.00%	0.00%
400	4,000,000	158,392.30	158,352.70	0.03960	0.03959	158,392.30	158,352.70	0.03960	0.03959	0.00	0.00	0.00%	0.00%
500	5,000,000	177,318.46	177,268.97	0.03546	0.03545	177,318.46	177,268.97	0.03546	0.03545	0.00	0.00	0.00%	0.00%
600	6,000,000	196,244.62	196,185.23	0.03271	0.03270	196,244.62	196,185.23	0.03271	0.03270	0.00	0.00	0.00%	0.00%
										20,000 KW			
200	4,000,000	240,892.30	240,852.70	0.06022	0.06021	240,892.30	240,852.70	0.06022	0.06021	0.00	0.00	0.00%	0.00%
300	6,000,000	278,744.62	278,685.23	0.04646	0.04645	278,744.62	278,685.23	0.04646	0.04645	0.00	0.00	0.00%	0.00%
400	8,000,000	316,596.95	316,517.76	0.03957	0.03956	316,596.95	316,517.76	0.03957	0.03956	0.00	0.00	0.00%	0.00%
500	10,000,000	354,449.28	354,350.30	0.03544	0.03544	354,449.28	354,350.30	0.03544	0.03544	0.00	0.00	0.00%	0.00%
600	12,000,000	392,301.61	392,182.83	0.03269	0.03268	392,301.61	392,182.83	0.03269	0.03268	0.00	0.00	0.00%	0.00%
										30,000 KW			
200	6,000,000	361,244.62	361,185.23	0.06021	0.06020	361,244.62	361,185.23	0.06021	0.06020	0.00	0.00	0.00%	0.00%
300	9,000,000	418,023.11	417,934.03	0.04645	0.04644	418,023.11	417,934.03	0.04645	0.04644	0.00	0.00	0.00%	0.00%
400	12,000,000	474,801.61	474,682.83	0.03957	0.03956	474,801.61	474,682.83	0.03957	0.03956	0.00	0.00	0.00%	0.00%
500	15,000,000	531,580.10	531,431.62	0.03544	0.03543	531,580.10	531,431.62	0.03544	0.03543	0.00	0.00	0.00%	0.00%
600	18,000,000	588,358.59	588,180.42	0.03269	0.03268	588,358.59	588,180.42	0.03269	0.03268	0.00	0.00	0.00%	0.00%
										40,000 KW			
200	8,000,000	481,596.95	481,517.76	0.06020	0.06019	481,596.95	481,517.76	0.06020	0.06019	0.00	0.00	0.00%	0.00%
300	12,000,000	557,301.61	557,182.83	0.04644	0.04643	557,301.61	557,182.83	0.04644	0.04643	0.00	0.00	0.00%	0.00%
400	16,000,000	633,006.26	632,847.89	0.03956	0.03955	633,006.26	632,847.89	0.03956	0.03955	0.00	0.00	0.00%	0.00%
500	20,000,000	708,710.92	708,512.95	0.03544	0.03543	708,710.92	708,512.95	0.03544	0.03543	0.00	0.00	0.00%	0.00%
600	24,000,000	784,415.57	784,178.01	0.03268	0.03267	784,415.57	784,178.01	0.03268	0.03267	0.00	0.00	0.00%	0.00%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT 3B " - Rate Year 1
DISTRICT OF COLUMBIA**

HOURS		CURRENT RATES				MRP RY1 RATES				INCREASE			
USE	KWH	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
MAXIMUM AND ON PEAK DEMAND = 10,000 KW													
200	2,000,000	37,701.78	38,501.78	0.01885	0.01925	37,501.78	38,301.78	0.01875	0.01915	(200.00)	(200.00)	-0.53%	-0.52%
300	3,000,000	50,440.98	51,240.98	0.01681	0.01708	50,240.98	51,040.98	0.01675	0.01701	(200.00)	(200.00)	-0.40%	-0.39%
400	4,000,000	63,180.18	63,980.18	0.01580	0.01600	62,980.18	63,780.18	0.01575	0.01595	(200.00)	(200.00)	-0.32%	-0.31%
500	5,000,000	75,919.38	76,719.38	0.01518	0.01534	75,719.38	76,519.38	0.01514	0.01530	(200.00)	(200.00)	-0.26%	-0.26%
600	6,000,000	88,658.58	89,458.58	0.01478	0.01491	88,458.58	89,258.58	0.01474	0.01488	(200.00)	(200.00)	-0.23%	-0.22%
20,000 KW													
200	4,000,000	74,980.18	76,580.18	0.01875	0.01915	74,580.18	76,180.18	0.01865	0.01905	(400.00)	(400.00)	-0.53%	-0.52%
300	6,000,000	100,458.58	102,058.58	0.01674	0.01701	100,058.58	101,658.58	0.01668	0.01694	(400.00)	(400.00)	-0.40%	-0.39%
400	8,000,000	125,936.98	127,536.98	0.01574	0.01594	125,536.98	127,136.98	0.01569	0.01589	(400.00)	(400.00)	-0.32%	-0.31%
500	10,000,000	151,415.38	153,015.38	0.01514	0.01530	151,015.38	152,615.38	0.01510	0.01526	(400.00)	(400.00)	-0.26%	-0.26%
600	12,000,000	176,893.78	178,493.78	0.01474	0.01487	176,493.78	178,093.78	0.01471	0.01484	(400.00)	(400.00)	-0.23%	-0.22%
30,000 KW													
200	6,000,000	112,258.58	114,658.58	0.01871	0.01911	111,658.58	114,058.58	0.01861	0.01901	(600.00)	(600.00)	-0.53%	-0.52%
300	9,000,000	150,476.18	152,876.18	0.01672	0.01699	149,876.18	152,276.18	0.01665	0.01692	(600.00)	(600.00)	-0.40%	-0.39%
400	12,000,000	188,693.78	191,093.78	0.01572	0.01592	188,093.78	190,493.78	0.01567	0.01587	(600.00)	(600.00)	-0.32%	-0.31%
500	15,000,000	226,911.38	229,311.38	0.01513	0.01529	226,311.38	228,711.38	0.01509	0.01525	(600.00)	(600.00)	-0.26%	-0.26%
600	18,000,000	265,128.98	267,528.98	0.01473	0.01486	264,528.98	266,928.98	0.01470	0.01483	(600.00)	(600.00)	-0.23%	-0.22%
40,000 KW													
200	8,000,000	149,536.98	152,736.98	0.01869	0.01909	148,736.98	151,936.98	0.01859	0.01899	(800.00)	(800.00)	-0.53%	-0.52%
300	12,000,000	200,493.78	203,693.78	0.01671	0.01697	199,693.78	202,893.78	0.01664	0.01691	(800.00)	(800.00)	-0.40%	-0.39%
400	16,000,000	251,450.58	254,650.58	0.01572	0.01592	250,650.58	253,850.58	0.01567	0.01587	(800.00)	(800.00)	-0.32%	-0.31%
500	20,000,000	302,407.38	305,607.38	0.01512	0.01528	301,607.38	304,807.38	0.01508	0.01524	(800.00)	(800.00)	-0.26%	-0.26%
600	24,000,000	353,364.18	356,564.18	0.01472	0.01486	352,564.18	355,764.18	0.01469	0.01482	(800.00)	(800.00)	-0.23%	-0.22%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "R" - Rate Year 2
DISTRICT OF COLUMBIA**

KWH	MRP RY1 RATES				MRP RY2 RATES				INCREASE					
	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)	(\$)	(%)
	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	ANNUAL	ANNUAL
0	17.03	17.11	-	-	17.03	17.11	-	-	0.00	0.00	0.00%	0.00%	0.00	0.00%
10	17.29	17.37	1.72914	1.73714	17.29	17.37	1.72871	1.73671	0.00	0.00	0.00%	0.00%	0.00	0.00%
20	17.55	17.63	0.87764	0.88164	17.54	17.62	0.87721	0.88121	-0.01	-0.01	-0.06%	-0.06%	-0.01	-0.06%
30	17.81	17.89	0.59381	0.59647	17.80	17.88	0.59337	0.59604	-0.01	-0.01	-0.06%	-0.06%	-0.01	-0.06%
40	18.73	18.84	0.46826	0.47091	18.71	18.82	0.46783	0.47048	-0.02	-0.02	-0.11%	-0.11%	-0.02	-0.11%
50	19.65	19.78	0.39293	0.39558	19.62	19.76	0.39250	0.39515	-0.02	-0.02	-0.10%	-0.10%	-0.02	-0.10%
100	24.23	24.49	0.24227	0.24491	24.18	24.45	0.24184	0.24448	-0.04	-0.04	-0.17%	-0.16%	-0.04	-0.16%
200	33.39	33.91	0.16694	0.16957	33.30	33.83	0.16651	0.16914	-0.09	-0.09	-0.27%	-0.27%	-0.09	-0.27%
300	42.55	43.34	0.14183	0.14446	42.42	43.21	0.14140	0.14403	-0.13	-0.13	-0.31%	-0.30%	-0.13	-0.30%
400	51.71	52.76	0.12927	0.13191	51.54	52.59	0.12884	0.13148	-0.17	-0.17	-0.33%	-0.32%	-0.17	-0.32%
500	62.15	62.87	0.12429	0.12574	61.85	62.61	0.12370	0.12522	-0.30	-0.26	-0.48%	-0.41%	-0.28	-0.44%
692	82.18	82.27	0.11876	0.11889	81.65	81.85	0.11799	0.11828	-0.53	-0.42	-0.64%	-0.51%	-0.47	-0.57%
700	83.02	83.08	0.11859	0.11869	82.47	82.65	0.11782	0.11807	-0.54	-0.43	-0.65%	-0.52%	-0.48	-0.57%
750	88.23	88.14	0.11764	0.11751	87.63	87.66	0.11684	0.11688	-0.60	-0.47	-0.68%	-0.53%	-0.52	-0.59%
800	93.45	93.19	0.11681	0.11649	92.79	92.67	0.11598	0.11584	-0.67	-0.52	-0.72%	-0.56%	-0.58	-0.62%
850	98.67	98.24	0.11608	0.11558	97.94	97.68	0.11522	0.11492	-0.73	-0.56	-0.74%	-0.57%	-0.63	-0.64%
900	103.89	103.30	0.11543	0.11477	103.10	102.69	0.11455	0.11410	-0.79	-0.60	-0.76%	-0.58%	-0.68	-0.66%
950	109.10	108.35	0.11485	0.11405	108.25	107.70	0.11395	0.11337	-0.85	-0.65	-0.78%	-0.60%	-0.73	-0.67%
1,000	114.32	113.40	0.11432	0.11340	113.41	112.71	0.11341	0.11271	-0.91	-0.69	-0.80%	-0.61%	-0.78	-0.69%
1,250	140.41	138.67	0.11233	0.11094	139.19	137.76	0.11135	0.11021	-1.22	-0.90	-0.87%	-0.65%	-1.03	-0.74%
1,500	166.50	163.94	0.11100	0.10929	164.97	162.82	0.10998	0.10854	-1.53	-1.12	-0.92%	-0.68%	-1.29	-0.78%
1,750	192.59	189.20	0.11005	0.10812	190.75	187.87	0.10900	0.10735	-1.84	-1.33	-0.96%	-0.70%	-1.54	-0.81%
2,000	218.67	214.47	0.10934	0.10723	216.53	212.92	0.10826	0.10646	-2.15	-1.55	-0.98%	-0.72%	-1.80	-0.83%
2,250	244.76	239.74	0.10878	0.10655	242.31	237.97	0.10769	0.10576	-2.45	-1.77	-1.00%	-0.74%	-2.05	-0.85%
2,500	270.85	265.00	0.10834	0.10600	268.09	263.02	0.10724	0.10521	-2.76	-1.98	-1.02%	-0.75%	-2.31	-0.86%
3,000	323.03	315.54	0.10768	0.10518	319.65	313.12	0.10655	0.10437	-3.38	-2.41	-1.05%	-0.76%	-2.81	-0.88%
3,500	375.20	366.07	0.10720	0.10459	371.21	363.23	0.10606	0.10378	-3.99	-2.84	-1.06%	-0.78%	-3.32	-0.90%
4,000	427.38	416.60	0.10685	0.10415	422.77	413.33	0.10569	0.10333	-4.61	-3.27	-1.08%	-0.78%	-3.83	-0.91%
5,000	531.73	517.67	0.10635	0.10353	525.89	513.54	0.10518	0.10271	-5.84	-4.13	-1.10%	-0.80%	-4.84	-0.92%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "MMA" - Rate Year 2
DISTRICT OF COLUMBIA**

KWH	MRP RY1 RATES				MRP RY2 RATES				INCREASE					
	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)	(\$)	(%)
	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	ANNUAL	ANNUAL
0	13.57	13.99	-	-	13.57	13.99	-	-	0.00	0.00	0.00%	0.00%	0.00	0.00%
100	20.28	21.67	0.20285	0.21669	20.31	21.70	0.20314	0.21699	0.03	0.03	0.15%	0.14%	0.03	0.14%
200	28.74	31.50	0.14368	0.15749	28.79	31.56	0.14397	0.15778	0.06	0.06	0.21%	0.19%	0.06	0.20%
300	37.19	41.33	0.12396	0.13776	37.27	41.42	0.12425	0.13805	0.09	0.09	0.24%	0.22%	0.09	0.23%
400	45.64	51.16	0.11410	0.12789	45.76	51.27	0.11439	0.12818	0.12	0.12	0.26%	0.23%	0.12	0.25%
500	55.50	61.74	0.11099	0.12348	55.70	61.91	0.11139	0.12383	0.20	0.17	0.36%	0.28%	0.18	0.31%
1000	104.79	114.64	0.10479	0.11464	105.40	115.11	0.10540	0.11511	0.62	0.46	0.59%	0.40%	0.53	0.48%
2000	203.37	220.45	0.10168	0.11023	204.81	221.50	0.10241	0.11075	1.45	1.05	0.71%	0.48%	1.22	0.57%
3000	301.95	326.26	0.10065	0.10875	304.23	327.89	0.10141	0.10930	2.28	1.63	0.76%	0.50%	1.90	0.60%
4000	400.53	432.07	0.10013	0.10802	403.64	434.28	0.10091	0.10857	3.11	2.21	0.78%	0.51%	2.59	0.62%
5000	499.11	537.88	0.09982	0.10758	503.05	540.67	0.10061	0.10813	3.94	2.79	0.79%	0.52%	3.27	0.63%
6000	597.69	643.69	0.09961	0.10728	602.46	647.06	0.10041	0.10784	4.77	3.37	0.80%	0.52%	3.95	0.63%
7000	696.27	749.50	0.09947	0.10707	701.87	753.45	0.10027	0.10764	5.61	3.95	0.81%	0.53%	4.64	0.64%
7500	745.56	802.41	0.09941	0.10699	751.58	806.65	0.10021	0.10755	6.02	4.24	0.81%	0.53%	4.98	0.64%
8000	794.85	855.31	0.09936	0.10691	801.29	859.84	0.10016	0.10748	6.44	4.53	0.81%	0.53%	5.33	0.64%
8500	844.14	908.22	0.09931	0.10685	850.99	913.04	0.10012	0.10742	6.85	4.82	0.81%	0.53%	5.67	0.64%
9000	893.43	961.13	0.09927	0.10679	900.70	966.23	0.10008	0.10736	7.27	5.11	0.81%	0.53%	6.01	0.64%
9500	942.72	1,014.03	0.09923	0.10674	950.40	1,019.43	0.10004	0.10731	7.69	5.40	0.82%	0.53%	6.35	0.65%
10000	992.01	1,066.94	0.09920	0.10669	1,000.11	1,072.62	0.10001	0.10726	8.10	5.69	0.82%	0.53%	6.69	0.65%
12500	1,238.46	1,331.46	0.09908	0.10652	1,248.64	1,338.60	0.09989	0.10709	10.18	7.14	0.82%	0.54%	8.41	0.65%
15000	1,484.91	1,595.99	0.09899	0.10640	1,497.17	1,604.57	0.09981	0.10697	12.26	8.59	0.83%	0.54%	10.12	0.65%
17500	1,731.36	1,860.51	0.09893	0.10631	1,745.70	1,870.55	0.09975	0.10689	14.34	10.04	0.83%	0.54%	11.83	0.65%
20000	1,977.81	2,125.04	0.09889	0.10625	1,994.23	2,136.53	0.09971	0.10683	16.42	11.49	0.83%	0.54%	13.54	0.66%
22500	2,224.26	2,389.56	0.09886	0.10620	2,242.76	2,402.50	0.09968	0.10678	18.50	12.94	0.83%	0.54%	15.26	0.66%
25000	2,470.71	2,654.09	0.09883	0.10616	2,491.29	2,668.48	0.09965	0.10674	20.58	14.39	0.83%	0.54%	16.97	0.66%
30000	2,963.61	3,183.14	0.09879	0.10610	2,988.35	3,200.43	0.09961	0.10668	24.73	17.29	0.83%	0.54%	20.39	0.66%
35000	3,456.51	3,712.19	0.09876	0.10606	3,485.41	3,732.38	0.09958	0.10664	28.89	20.19	0.84%	0.54%	23.82	0.66%
40000	3,949.42	4,241.24	0.09874	0.10603	3,982.47	4,264.34	0.09956	0.10661	33.05	23.09	0.84%	0.54%	27.24	0.66%
50000	4,935.22	5,299.34	0.09870	0.10599	4,976.59	5,328.24	0.09953	0.10656	41.37	28.90	0.84%	0.55%	34.10	0.66%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GS ND" - Rate Year 2
DISTRICT OF COLUMBIA**

KWH	MRP RY1 RATES				MRP RY2 RATES				INCREASE					
	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)	(\$)	(%)
	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	ANNUAL	ANNUAL
0	27.42	27.42	-	-	27.42	27.42	-	-	0.00	0.00	0.00%	0.00%	0.00	0.00%
10	28.66	28.58	2.86573	2.85844	28.66	28.59	2.86635	2.85892	0.01	0.00	0.03%	0.00%	0.00	0.01%
20	29.89	29.75	1.49473	1.48744	29.91	29.76	1.49535	1.48792	0.01	0.01	0.03%	0.03%	0.01	0.03%
30	31.13	30.91	1.03773	1.03044	31.15	30.93	1.03835	1.03092	0.02	0.01	0.06%	0.03%	0.01	0.05%
40	32.37	32.08	0.80923	0.80194	32.39	32.10	0.80985	0.80242	0.02	0.02	0.06%	0.06%	0.02	0.06%
50	33.61	33.24	0.67213	0.66484	33.64	33.27	0.67275	0.66532	0.03	0.02	0.09%	0.06%	0.02	0.07%
100	39.79	39.06	0.39793	0.39064	39.85	39.11	0.39855	0.39112	0.06	0.05	0.15%	0.13%	0.05	0.14%
150	45.98	44.89	0.30653	0.29924	46.07	44.96	0.30715	0.29972	0.09	0.07	0.20%	0.16%	0.08	0.17%
200	52.17	50.71	0.26083	0.25354	52.29	50.80	0.26145	0.25402	0.12	0.10	0.23%	0.20%	0.11	0.21%
250	58.35	56.53	0.23341	0.22612	58.51	56.65	0.23403	0.22660	0.15	0.12	0.26%	0.21%	0.13	0.23%
300	64.54	62.35	0.21513	0.20784	64.72	62.50	0.21575	0.20832	0.19	0.15	0.29%	0.24%	0.17	0.26%
400	76.91	74.00	0.19228	0.18499	77.16	74.19	0.19290	0.18547	0.25	0.19	0.33%	0.26%	0.22	0.29%
500	89.28	85.64	0.17857	0.17128	89.59	85.88	0.17919	0.17176	0.31	0.24	0.35%	0.28%	0.27	0.31%
600	101.66	97.28	0.16943	0.16214	102.03	97.57	0.17005	0.16262	0.37	0.29	0.36%	0.30%	0.32	0.33%
700	114.03	108.93	0.16290	0.15561	114.46	109.27	0.16352	0.15610	0.43	0.34	0.38%	0.31%	0.38	0.34%
800	126.40	120.57	0.15800	0.15071	126.90	120.96	0.15862	0.15120	0.50	0.39	0.40%	0.32%	0.44	0.35%
900	138.77	132.22	0.15419	0.14691	139.33	132.65	0.15481	0.14739	0.56	0.44	0.40%	0.33%	0.49	0.36%
1,000	151.15	143.86	0.15115	0.14386	151.77	144.34	0.15177	0.14434	0.62	0.49	0.41%	0.34%	0.54	0.37%
1,250	182.08	172.97	0.14566	0.13838	182.85	173.58	0.14628	0.13886	0.77	0.61	0.42%	0.35%	0.68	0.38%
1,500	213.01	202.08	0.14201	0.13472	213.94	202.81	0.14263	0.13520	0.93	0.73	0.44%	0.36%	0.81	0.39%
1,750	243.94	231.19	0.13939	0.13211	245.02	232.04	0.14001	0.13259	1.08	0.85	0.44%	0.37%	0.95	0.40%
2,000	274.87	260.30	0.13744	0.13015	276.11	261.27	0.13806	0.13063	1.24	0.97	0.45%	0.37%	1.08	0.41%
2,500	336.73	318.52	0.13469	0.12741	338.28	319.73	0.13531	0.12789	1.55	1.21	0.46%	0.38%	1.35	0.41%
3,000	398.60	376.74	0.13287	0.12558	400.46	378.19	0.13349	0.12606	1.86	1.46	0.47%	0.39%	1.63	0.42%
3,500	460.46	434.96	0.13156	0.12427	462.63	436.66	0.13218	0.12476	2.17	1.70	0.47%	0.39%	1.90	0.43%
4,000	522.32	493.18	0.13058	0.12329	524.80	495.12	0.13120	0.12378	2.48	1.94	0.47%	0.39%	2.17	0.43%
5,000	646.05	609.62	0.12921	0.12192	649.15	612.04	0.12983	0.12241	3.10	2.43	0.48%	0.40%	2.71	0.43%
6,000	769.78	726.06	0.12830	0.12101	773.49	728.97	0.12892	0.12149	3.72	2.91	0.48%	0.40%	3.25	0.44%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GS D LV" - Rate Year 2
DISTRICT OF COLUMBIA**

KW	Hours	KWH	MRP RY1 RATES				MRP RY2 RATES				INCREASE			
			\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
			SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
10	100	1000	224.46	230.37	0.22446	0.23037	225.36	231.05	0.22536	0.23105	0.90	0.68	0.40%	0.30%
	200	2000	338.65	350.46	0.16933	0.17523	340.45	351.82	0.17022	0.17591	1.80	1.36	0.53%	0.39%
	300	3000	452.84	470.56	0.15095	0.15685	455.53	472.60	0.15184	0.15753	2.69	2.04	0.59%	0.43%
	400	4000	567.03	590.66	0.14176	0.14766	570.62	593.38	0.14266	0.14834	3.59	2.72	0.63%	0.46%
	500	5000	681.22	710.75	0.13624	0.14215	685.71	714.15	0.13714	0.14283	4.49	3.40	0.66%	0.48%
	600	6000	795.41	830.85	0.13257	0.13847	800.80	834.93	0.13347	0.13915	5.39	4.08	0.68%	0.49%
25	100	2,500	508.40	523.16	0.20336	0.20926	510.64	524.86	0.20426	0.20994	2.24	1.70	0.44%	0.32%
	200	5,000	793.87	823.40	0.15877	0.16468	798.36	826.80	0.15967	0.16536	4.49	3.40	0.57%	0.41%
	300	7,500	1,079.35	1,123.64	0.14391	0.14982	1,086.08	1,128.74	0.14481	0.15050	6.73	5.10	0.62%	0.45%
	400	10,000	1,364.82	1,423.88	0.13648	0.14239	1,373.80	1,430.68	0.13738	0.14307	8.98	6.80	0.66%	0.48%
	500	12,500	1,650.30	1,724.12	0.13202	0.13793	1,661.52	1,732.63	0.13292	0.13861	11.22	8.50	0.68%	0.49%
	600	15,000	1,935.77	2,024.36	0.12905	0.13496	1,949.24	2,034.57	0.12995	0.13564	13.47	10.20	0.70%	0.50%
50	100	5,000	981.62	1,011.15	0.19632	0.20223	986.11	1,014.55	0.19722	0.20291	4.49	3.40	0.46%	0.34%
	200	10,000	1,552.57	1,611.63	0.15526	0.16116	1,561.55	1,618.43	0.15615	0.16184	8.98	6.80	0.58%	0.42%
	300	15,000	2,123.52	2,212.11	0.14157	0.14747	2,136.99	2,222.32	0.14247	0.14815	13.47	10.20	0.63%	0.46%
	400	20,000	2,694.48	2,812.60	0.13472	0.14063	2,712.43	2,826.20	0.13562	0.14131	17.95	13.60	0.67%	0.48%
	500	25,000	3,265.43	3,413.08	0.13062	0.13652	3,287.87	3,430.08	0.13151	0.13720	22.44	17.00	0.69%	0.50%
	600	30,000	3,836.38	4,013.56	0.12788	0.13379	3,863.31	4,033.96	0.12878	0.13447	26.93	20.40	0.70%	0.51%
75	100	7,500	1,454.85	1,499.14	0.19398	0.19989	1,461.58	1,504.24	0.19488	0.20057	6.73	5.10	0.46%	0.34%
	200	15,000	2,311.27	2,399.86	0.15408	0.15999	2,324.74	2,410.07	0.15498	0.16067	13.47	10.20	0.58%	0.43%
	300	22,500	3,167.70	3,300.59	0.14079	0.14669	3,187.90	3,315.89	0.14168	0.14737	20.20	15.30	0.64%	0.46%
	400	30,000	4,024.13	4,201.31	0.13414	0.14004	4,051.06	4,221.71	0.13504	0.14072	26.93	20.40	0.67%	0.49%
	500	37,500	4,880.56	5,102.03	0.13015	0.13605	4,914.22	5,127.54	0.13105	0.13673	33.66	25.51	0.69%	0.50%
	600	45,000	5,736.98	6,002.75	0.12749	0.13339	5,777.38	6,033.36	0.12839	0.13407	40.40	30.61	0.70%	0.51%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "MGT LV" - Rate Year 2
DISTRICT OF COLUMBIA**

HOURS USE	KWH	MRP RY1 RATES				MRP RY2 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
MAXIMUM AND ON PEAK DEMAND = 25 KW													
200	5,000	884.24	884.24	0.17685	0.17685	887.34	887.34	0.17747	0.17747	3.11	3.11	0.35%	0.35%
300	7,500	959.85	959.85	0.12798	0.12798	964.51	964.51	0.12860	0.12860	4.66	4.66	0.49%	0.49%
400	10,000	1,035.46	1,035.46	0.10355	0.10355	1,041.68	1,041.68	0.10417	0.10417	6.21	6.21	0.60%	0.60%
500	12,500	1,111.08	1,111.08	0.08889	0.08889	1,118.84	1,118.84	0.08951	0.08951	7.76	7.76	0.70%	0.70%
600	15,000	1,186.69	1,186.69	0.07911	0.07911	1,196.01	1,196.01	0.07973	0.07973	9.32	9.32	0.79%	0.79%
50 KW													
200	10,000	1,311.71	1,311.71	0.13117	0.13117	1,317.93	1,317.93	0.13179	0.13179	6.21	6.21	0.47%	0.47%
300	15,000	1,462.94	1,462.94	0.09753	0.09753	1,472.26	1,472.26	0.09815	0.09815	9.32	9.32	0.64%	0.64%
400	20,000	1,614.17	1,614.17	0.08071	0.08071	1,626.59	1,626.59	0.08133	0.08133	12.42	12.42	0.77%	0.77%
500	25,000	1,765.40	1,765.40	0.07062	0.07062	1,780.92	1,780.92	0.07124	0.07124	15.53	15.53	0.88%	0.88%
600	30,000	1,916.62	1,916.62	0.06389	0.06389	1,935.26	1,935.26	0.06451	0.06451	18.63	18.63	0.97%	0.97%
75 KW													
200	15,000	1,739.19	1,739.19	0.11595	0.11595	1,748.51	1,748.51	0.11657	0.11657	9.32	9.32	0.54%	0.54%
300	22,500	1,966.03	1,966.03	0.08738	0.08738	1,980.01	1,980.01	0.08800	0.08800	13.97	13.97	0.71%	0.71%
400	30,000	2,192.87	2,192.87	0.07310	0.07310	2,211.51	2,211.51	0.07372	0.07372	18.63	18.63	0.85%	0.85%
500	37,500	2,419.71	2,419.71	0.06453	0.06453	2,443.00	2,443.00	0.06515	0.06515	23.29	23.29	0.96%	0.96%
600	45,000	2,646.55	2,646.55	0.05881	0.05881	2,674.50	2,674.50	0.05943	0.05943	27.95	27.95	1.06%	1.06%
100 KW													
200	20,000	2,166.67	2,166.67	0.10833	0.10833	2,179.09	2,179.09	0.10895	0.10895	12.42	12.42	0.57%	0.57%
300	30,000	2,469.12	2,469.12	0.08230	0.08230	2,487.76	2,487.76	0.08293	0.08293	18.63	18.63	0.75%	0.75%
400	40,000	2,771.58	2,771.58	0.06929	0.06929	2,796.42	2,796.42	0.06991	0.06991	24.84	24.84	0.90%	0.90%
500	50,000	3,074.03	3,074.03	0.06148	0.06148	3,105.09	3,105.09	0.06210	0.06210	31.05	31.05	1.01%	1.01%
600	60,000	3,376.49	3,376.49	0.05627	0.05627	3,413.75	3,413.75	0.05690	0.05690	37.27	37.27	1.10%	1.10%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "MGT LV" - Rate Year 2
DISTRICT OF COLUMBIA**

HOURS USE	KWH	MRP RY1 RATES				MRP RY2 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
						MAXIMUM AND ON PEAK DEMAND = 200 KW							
200	40,000	3,876.58	3,876.58	0.09691	0.09691	3,901.42	3,901.42	0.09754	0.09754	24.84	24.84	0.64%	0.64%
300	60,000	4,481.49	4,481.49	0.07469	0.07469	4,518.75	4,518.75	0.07531	0.07531	37.27	37.27	0.83%	0.83%
400	80,000	5,086.39	5,086.39	0.06358	0.06358	5,136.08	5,136.08	0.06420	0.06420	49.69	49.69	0.98%	0.98%
500	100,000	5,691.30	5,691.30	0.05691	0.05691	5,753.41	5,753.41	0.05753	0.05753	62.11	62.11	1.09%	1.09%
600	120,000	6,296.21	6,296.21	0.05247	0.05247	6,370.74	6,370.74	0.05309	0.05309	74.53	74.53	1.18%	1.18%
										400 KW			
200	80,000	7,296.39	7,296.39	0.09120	0.09120	7,346.08	7,346.08	0.09183	0.09183	49.69	49.69	0.68%	0.68%
300	120,000	8,506.21	8,506.21	0.07089	0.07089	8,580.74	8,580.74	0.07151	0.07151	74.53	74.53	0.88%	0.88%
400	160,000	9,716.03	9,716.03	0.06073	0.06073	9,815.40	9,815.40	0.06135	0.06135	99.37	99.37	1.02%	1.02%
500	200,000	10,925.85	10,925.85	0.05463	0.05463	11,050.07	11,050.07	0.05525	0.05525	124.22	124.22	1.14%	1.14%
600	240,000	12,135.66	12,135.66	0.05057	0.05057	12,284.73	12,284.73	0.05119	0.05119	149.06	149.06	1.23%	1.23%
										600 KW			
200	120,000	10,716.21	10,716.21	0.08930	0.08930	10,790.74	10,790.74	0.08992	0.08992	74.53	74.53	0.70%	0.70%
300	180,000	12,530.94	12,530.94	0.06962	0.06962	12,642.73	12,642.73	0.07024	0.07024	111.80	111.80	0.89%	0.89%
400	240,000	14,345.66	14,345.66	0.05977	0.05977	14,494.73	14,494.73	0.06039	0.06039	149.06	149.06	1.04%	1.04%
500	300,000	16,160.39	16,160.39	0.05387	0.05387	16,346.72	16,346.72	0.05449	0.05449	186.33	186.33	1.15%	1.15%
600	360,000	17,975.12	17,975.12	0.04993	0.04993	18,198.71	18,198.71	0.05055	0.05055	223.59	223.59	1.24%	1.24%
										800 KW			
200	160,000	14,136.03	14,136.03	0.08835	0.08835	14,235.40	14,235.40	0.08897	0.08897	99.37	99.37	0.70%	0.70%
300	240,000	16,555.66	16,555.66	0.06898	0.06898	16,704.73	16,704.73	0.06960	0.06960	149.06	149.06	0.90%	0.90%
400	320,000	18,975.30	18,975.30	0.05930	0.05930	19,174.05	19,174.05	0.05992	0.05992	198.75	198.75	1.05%	1.05%
500	400,000	21,394.93	21,394.93	0.05349	0.05349	21,643.37	21,643.37	0.05411	0.05411	248.44	248.44	1.16%	1.16%
600	480,000	23,814.57	23,814.57	0.04961	0.04961	24,112.69	24,112.69	0.05023	0.05023	298.12	298.12	1.25%	1.25%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT LV" - Rate Year 2
DISTRICT OF COLUMBIA**

HOURS USE	KWH	MRP RY1 RATES				MRP RY2 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
MAXIMUM AND ON PEAK DEMAND = 100 KW													
200	20,000	2,203.21	2,203.21	0.11016	0.11016	2,216.69	2,216.69	0.11083	0.11083	13.49	13.49	0.61%	0.61%
300	30,000	2,523.93	2,523.93	0.08413	0.08413	2,544.16	2,544.16	0.08481	0.08481	20.23	20.23	0.80%	0.80%
400	40,000	2,844.65	2,844.65	0.07112	0.07112	2,871.63	2,871.63	0.07179	0.07179	26.98	26.98	0.95%	0.95%
500	50,000	3,165.37	3,165.37	0.06331	0.06331	3,199.10	3,199.10	0.06398	0.06398	33.72	33.72	1.07%	1.07%
600	60,000	3,486.10	3,486.10	0.05810	0.05810	3,526.56	3,526.56	0.05878	0.05878	40.47	40.47	1.16%	1.16%
300 KW													
200	60,000	5,696.10	5,696.10	0.09493	0.09493	5,736.56	5,736.56	0.09561	0.09561	40.47	40.47	0.71%	0.71%
300	90,000	6,658.26	6,658.26	0.07398	0.07398	6,718.97	6,718.97	0.07466	0.07466	60.70	60.70	0.91%	0.91%
400	120,000	7,620.43	7,620.43	0.06350	0.06350	7,701.37	7,701.37	0.06418	0.06418	80.93	80.93	1.06%	1.06%
500	150,000	8,582.60	8,582.60	0.05722	0.05722	8,683.77	8,683.77	0.05789	0.05789	101.17	101.17	1.18%	1.18%
600	180,000	9,544.77	9,544.77	0.05303	0.05303	9,666.17	9,666.17	0.05370	0.05370	121.40	121.40	1.27%	1.27%
500 KW													
200	100,000	9,188.99	9,188.99	0.09189	0.09189	9,256.43	9,256.43	0.09256	0.09256	67.44	67.44	0.73%	0.73%
300	150,000	10,792.60	10,792.60	0.07195	0.07195	10,893.77	10,893.77	0.07263	0.07263	101.17	101.17	0.94%	0.94%
400	200,000	12,396.22	12,396.22	0.06198	0.06198	12,531.10	12,531.10	0.06266	0.06266	134.89	134.89	1.09%	1.09%
500	250,000	13,999.83	13,999.83	0.05600	0.05600	14,168.44	14,168.44	0.05667	0.05667	168.61	168.61	1.20%	1.20%
600	300,000	15,603.44	15,603.44	0.05201	0.05201	15,805.78	15,805.78	0.05269	0.05269	202.33	202.33	1.30%	1.30%
1,000 KW													
200	200,000	17,921.22	17,921.22	0.08961	0.08961	18,056.10	18,056.10	0.09028	0.09028	134.89	134.89	0.75%	0.75%
300	300,000	21,128.44	21,128.44	0.07043	0.07043	21,330.78	21,330.78	0.07110	0.07110	202.33	202.33	0.96%	0.96%
400	400,000	24,335.67	24,335.67	0.06084	0.06084	24,605.45	24,605.45	0.06151	0.06151	269.78	269.78	1.11%	1.11%
500	500,000	27,542.90	27,542.90	0.05509	0.05509	27,880.12	27,880.12	0.05576	0.05576	337.22	337.22	1.22%	1.22%
600	600,000	30,750.13	30,750.13	0.05125	0.05125	31,154.79	31,154.79	0.05192	0.05192	404.67	404.67	1.32%	1.32%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT LV" - Rate Year 2
DISTRICT OF COLUMBIA**

HOURS USE	KWH	MRP RY1 RATES				MRP RY2 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
						MAXIMUM AND ON PEAK DEMAND = 2,000 KW							
200	400,000	35,385.67	35,385.67	0.08846	0.08846	35,655.45	35,655.45	0.08914	0.08914	269.78	269.78	0.76%	0.76%
300	600,000	41,800.13	41,800.13	0.06967	0.06967	42,204.79	42,204.79	0.07034	0.07034	404.67	404.67	0.97%	0.97%
400	800,000	48,214.58	48,214.58	0.06027	0.06027	48,754.14	48,754.14	0.06094	0.06094	539.56	539.56	1.12%	1.12%
500	1,000,000	54,629.04	54,629.04	0.05463	0.05463	55,303.48	55,303.48	0.05530	0.05530	674.45	674.45	1.23%	1.23%
600	1,200,000	61,043.49	61,043.49	0.05087	0.05087	61,852.83	61,852.83	0.05154	0.05154	809.33	809.33	1.33%	1.33%
										4,000 KW			
200	800,000	70,314.58	70,314.58	0.08789	0.08789	70,854.14	70,854.14	0.08857	0.08857	539.56	539.56	0.77%	0.77%
300	1,200,000	83,143.49	83,143.49	0.06929	0.06929	83,952.83	83,952.83	0.06996	0.06996	809.33	809.33	0.97%	0.97%
400	1,600,000	95,972.40	95,972.40	0.05998	0.05998	97,051.52	97,051.52	0.06066	0.06066	1,079.11	1,079.11	1.12%	1.12%
500	2,000,000	108,801.31	108,801.31	0.05440	0.05440	110,150.21	110,150.21	0.05508	0.05508	1,348.89	1,348.89	1.24%	1.24%
600	2,400,000	121,630.23	121,630.23	0.05068	0.05068	123,248.90	123,248.90	0.05135	0.05135	1,618.67	1,618.67	1.33%	1.33%
										6,000 KW			
200	1,200,000	105,243.49	105,243.49	0.08770	0.08770	106,052.83	106,052.83	0.08838	0.08838	809.33	809.33	0.77%	0.77%
300	1,800,000	124,486.86	124,486.86	0.06916	0.06916	125,700.86	125,700.86	0.06983	0.06983	1,214.00	1,214.00	0.98%	0.98%
400	2,400,000	143,730.23	143,730.23	0.05989	0.05989	145,348.90	145,348.90	0.06056	0.06056	1,618.67	1,618.67	1.13%	1.13%
500	3,000,000	162,973.59	162,973.59	0.05432	0.05432	164,996.93	164,996.93	0.05500	0.05500	2,023.34	2,023.34	1.24%	1.24%
600	3,600,000	182,216.96	182,216.96	0.05062	0.05062	184,644.96	184,644.96	0.05129	0.05129	2,428.00	2,428.00	1.33%	1.33%
										8,000 KW			
200	1,600,000	140,172.40	140,172.40	0.08761	0.08761	141,251.52	141,251.52	0.08828	0.08828	1,079.11	1,079.11	0.77%	0.77%
300	2,400,000	165,830.23	165,830.23	0.06910	0.06910	167,448.90	167,448.90	0.06977	0.06977	1,618.67	1,618.67	0.98%	0.98%
400	3,200,000	191,488.05	191,488.05	0.05984	0.05984	193,646.27	193,646.27	0.06051	0.06051	2,158.23	2,158.23	1.13%	1.13%
500	4,000,000	217,145.87	217,145.87	0.05429	0.05429	219,843.65	219,843.65	0.05496	0.05496	2,697.78	2,697.78	1.24%	1.24%
600	4,800,000	242,803.69	242,803.69	0.05058	0.05058	246,041.03	246,041.03	0.05126	0.05126	3,237.34	3,237.34	1.33%	1.33%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT 3A " - Rate Year 2
DISTRICT OF COLUMBIA**

HOURS USE	KWH	MRP RY1 RATES				MRP RY2 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
						MAXIMUM AND ON PEAK DEMAND =				1,000 KW			
200	200,000	12,223.48	12,221.48	0.06112	0.06111	12,293.48	12,289.48	0.06147	0.06145	70.00	68.00	0.57%	0.56%
300	300,000	14,116.40	14,113.40	0.04705	0.04704	14,221.40	14,215.40	0.04740	0.04738	105.00	102.00	0.74%	0.72%
400	400,000	16,009.32	16,005.32	0.04002	0.04001	16,149.32	16,141.32	0.04037	0.04035	140.00	136.00	0.87%	0.85%
500	500,000	17,902.24	17,897.24	0.03580	0.03579	18,077.24	18,067.24	0.03615	0.03613	175.00	170.00	0.98%	0.95%
600	600,000	19,795.16	19,789.16	0.03299	0.03298	20,005.16	19,993.16	0.03334	0.03332	210.00	204.00	1.06%	1.03%
										2,000 KW			
200	400,000	24,259.32	24,255.32	0.06065	0.06064	24,399.32	24,391.32	0.06100	0.06098	140.00	136.00	0.58%	0.56%
300	600,000	28,045.16	28,039.16	0.04674	0.04673	28,255.16	28,243.16	0.04709	0.04707	210.00	204.00	0.75%	0.73%
400	800,000	31,831.00	31,823.00	0.03979	0.03978	32,111.00	32,095.00	0.04014	0.04012	280.00	272.00	0.88%	0.85%
500	1,000,000	35,616.84	35,606.84	0.03562	0.03561	35,966.84	35,946.84	0.03597	0.03595	350.00	340.00	0.98%	0.95%
600	1,200,000	39,402.68	39,390.68	0.03284	0.03283	39,822.68	39,798.68	0.03319	0.03317	420.00	408.00	1.07%	1.04%
										5,000 KW			
200	1,000,000	60,366.84	60,356.84	0.06037	0.06036	60,716.84	60,696.84	0.06072	0.06070	350.00	340.00	0.58%	0.56%
300	1,500,000	69,831.44	69,816.44	0.04655	0.04654	70,356.44	70,326.44	0.04690	0.04688	525.00	510.00	0.75%	0.73%
400	2,000,000	79,296.04	79,276.04	0.03965	0.03964	79,996.04	79,956.04	0.04000	0.03998	700.00	680.00	0.88%	0.86%
500	2,500,000	88,760.64	88,735.64	0.03550	0.03549	89,635.64	89,585.64	0.03585	0.03583	875.00	850.00	0.99%	0.96%
600	3,000,000	98,225.24	98,195.24	0.03274	0.03273	99,275.24	99,215.24	0.03309	0.03307	1,050.00	1,020.00	1.07%	1.04%
										7,500 KW			
200	1,500,000	90,456.44	90,441.44	0.06030	0.06029	90,981.44	90,951.44	0.06065	0.06063	525.00	510.00	0.58%	0.56%
300	2,250,000	104,653.34	104,630.84	0.04651	0.04650	105,440.84	105,395.84	0.04686	0.04684	787.50	765.00	0.75%	0.73%
400	3,000,000	118,850.24	118,820.24	0.03962	0.03961	119,900.24	119,840.24	0.03997	0.03995	1,050.00	1,020.00	0.88%	0.86%
500	3,750,000	133,047.14	133,009.64	0.03548	0.03547	134,359.64	134,284.64	0.03583	0.03581	1,312.50	1,275.00	0.99%	0.96%
600	4,500,000	147,244.04	147,199.04	0.03272	0.03271	148,819.04	148,729.04	0.03307	0.03305	1,575.00	1,530.00	1.07%	1.04%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT 3A " - Rate Year 2
DISTRICT OF COLUMBIA**

HOURS USE	KWH	PRESENT 'GT-3A'				PROPOSED 'GT- 3A'				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
MAXIMUM AND ON PEAK DEMAND = 10,000 KW													
200	2,000,000	120,546.04	120,526.04	0.06027	0.06026	121,226.04	121,206.04	0.06061	0.06060	680.00	680.00	0.56%	0.56%
300	3,000,000	139,475.24	139,445.24	0.04649	0.04648	140,495.24	140,465.24	0.04683	0.04682	1,020.00	1,020.00	0.73%	0.73%
400	4,000,000	158,404.44	158,364.44	0.03960	0.03959	159,764.44	159,724.44	0.03994	0.03993	1,360.00	1,360.00	0.86%	0.86%
500	5,000,000	177,333.64	177,283.64	0.03547	0.03546	179,033.64	178,983.64	0.03581	0.03580	1,700.00	1,700.00	0.96%	0.96%
600	6,000,000	196,262.84	196,202.84	0.03271	0.03270	198,302.84	198,242.84	0.03305	0.03304	2,040.00	2,040.00	1.04%	1.04%
20,000 KW													
200	4,000,000	240,904.44	240,864.44	0.06023	0.06022	242,264.44	242,224.44	0.06057	0.06056	1,360.00	1,360.00	0.56%	0.56%
300	6,000,000	278,762.84	278,702.84	0.04646	0.04645	280,802.84	280,742.84	0.04680	0.04679	2,040.00	2,040.00	0.73%	0.73%
400	8,000,000	316,621.24	316,541.24	0.03958	0.03957	319,341.24	319,261.24	0.03992	0.03991	2,720.00	2,720.00	0.86%	0.86%
500	10,000,000	354,479.64	354,379.64	0.03545	0.03544	357,879.64	357,779.64	0.03579	0.03578	3,400.00	3,400.00	0.96%	0.96%
600	12,000,000	392,338.04	392,218.04	0.03269	0.03268	396,418.04	396,298.04	0.03303	0.03302	4,080.00	4,080.00	1.04%	1.04%
30,000 KW													
200	6,000,000	361,262.84	361,202.84	0.06021	0.06020	363,302.84	363,242.84	0.06055	0.06054	2,040.00	2,040.00	0.56%	0.56%
300	9,000,000	418,050.44	417,960.44	0.04645	0.04644	421,110.44	421,020.44	0.04679	0.04678	3,060.00	3,060.00	0.73%	0.73%
400	12,000,000	474,838.04	474,718.04	0.03957	0.03956	478,918.04	478,798.04	0.03991	0.03990	4,080.00	4,080.00	0.86%	0.86%
500	15,000,000	531,625.64	531,475.64	0.03544	0.03543	536,725.64	536,575.64	0.03578	0.03577	5,100.00	5,100.00	0.96%	0.96%
600	18,000,000	588,413.24	588,233.24	0.03269	0.03268	594,533.24	594,353.24	0.03303	0.03302	6,120.00	6,120.00	1.04%	1.04%
40,000 KW													
200	8,000,000	481,621.24	481,541.24	0.06020	0.06019	484,341.24	484,261.24	0.06054	0.06053	2,720.00	2,720.00	0.56%	0.56%
300	12,000,000	557,338.04	557,218.04	0.04644	0.04643	561,418.04	561,298.04	0.04678	0.04677	4,080.00	4,080.00	0.73%	0.73%
400	16,000,000	633,054.84	632,894.84	0.03957	0.03956	638,494.84	638,334.84	0.03991	0.03990	5,440.00	5,440.00	0.86%	0.86%
500	20,000,000	708,771.64	708,571.64	0.03544	0.03543	715,571.64	715,371.64	0.03578	0.03577	6,800.00	6,800.00	0.96%	0.96%
600	24,000,000	784,488.44	784,248.44	0.03269	0.03268	792,648.44	792,408.44	0.03303	0.03302	8,160.00	8,160.00	1.04%	1.04%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT 3B" - Rate Year 2
DISTRICT OF COLUMBIA**

HOURS		MRP RY1 RATES				MRP RY2 RATES				INCREASE			
USE	KWH	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
MAXIMUM AND ON PEAK DEMAND = 10,000 KW													
200	2,000,000	37,501.78	38,301.78	0.01875	0.01915	37,701.78	38,501.78	0.01885	0.01925	200.00	200.00	0.53%	0.52%
300	3,000,000	50,240.98	51,040.98	0.01675	0.01701	50,440.98	51,240.98	0.01681	0.01708	200.00	200.00	0.40%	0.39%
400	4,000,000	62,980.18	63,780.18	0.01575	0.01595	63,180.18	63,980.18	0.01580	0.01600	200.00	200.00	0.32%	0.31%
500	5,000,000	75,719.38	76,519.38	0.01514	0.01530	75,919.38	76,719.38	0.01518	0.01534	200.00	200.00	0.26%	0.26%
600	6,000,000	88,458.58	89,258.58	0.01474	0.01488	88,658.58	89,458.58	0.01478	0.01491	200.00	200.00	0.23%	0.22%
20,000 KW													
200	4,000,000	74,580.18	76,180.18	0.01865	0.01905	74,980.18	76,580.18	0.01875	0.01915	400.00	400.00	0.54%	0.53%
300	6,000,000	100,058.58	101,658.58	0.01668	0.01694	100,458.58	102,058.58	0.01674	0.01701	400.00	400.00	0.40%	0.39%
400	8,000,000	125,536.98	127,136.98	0.01569	0.01589	125,936.98	127,536.98	0.01574	0.01594	400.00	400.00	0.32%	0.31%
500	10,000,000	151,015.38	152,615.38	0.01510	0.01526	151,415.38	153,015.38	0.01514	0.01530	400.00	400.00	0.26%	0.26%
600	12,000,000	176,493.78	178,093.78	0.01471	0.01484	176,893.78	178,493.78	0.01474	0.01487	400.00	400.00	0.23%	0.22%
30,000 KW													
200	6,000,000	111,658.58	114,058.58	0.01861	0.01901	112,258.58	114,658.58	0.01871	0.01911	600.00	600.00	0.54%	0.53%
300	9,000,000	149,876.18	152,276.18	0.01665	0.01692	150,476.18	152,876.18	0.01672	0.01699	600.00	600.00	0.40%	0.39%
400	12,000,000	188,093.78	190,493.78	0.01567	0.01587	188,693.78	191,093.78	0.01572	0.01592	600.00	600.00	0.32%	0.31%
500	15,000,000	226,311.38	228,711.38	0.01509	0.01525	226,911.38	229,311.38	0.01513	0.01529	600.00	600.00	0.27%	0.26%
600	18,000,000	264,528.98	266,928.98	0.01470	0.01483	265,128.98	267,528.98	0.01473	0.01486	600.00	600.00	0.23%	0.22%
40,000 KW													
200	8,000,000	148,736.98	151,936.98	0.01859	0.01899	149,536.98	152,736.98	0.01869	0.01909	800.00	800.00	0.54%	0.53%
300	12,000,000	199,693.78	202,893.78	0.01664	0.01691	200,493.78	203,693.78	0.01671	0.01697	800.00	800.00	0.40%	0.39%
400	16,000,000	250,650.58	253,850.58	0.01567	0.01587	251,450.58	254,650.58	0.01572	0.01592	800.00	800.00	0.32%	0.32%
500	20,000,000	301,607.38	304,807.38	0.01508	0.01524	302,407.38	305,607.38	0.01512	0.01528	800.00	800.00	0.27%	0.26%
600	24,000,000	352,564.18	355,764.18	0.01469	0.01482	353,364.18	356,564.18	0.01472	0.01486	800.00	800.00	0.23%	0.22%

POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "R" - Rate Year 3
DISTRICT OF COLUMBIA

KWH	MRP RY2 RATES				MRP RY3 RATES				INCREASE					
	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)	(\$)	(%)
	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	ANNUAL	ANNUAL
0	17.03	17.11	-	-	20.05	20.13	-	-	3.02	3.02	17.73%	17.65%	3.02	17.68%
10	17.29	17.37	1.72871	1.73671	20.35	20.43	2.03488	2.04291	3.06	3.06	17.70%	17.62%	3.06	17.65%
20	17.54	17.62	0.87721	0.88121	20.65	20.73	1.03238	1.03641	3.10	3.10	17.67%	17.59%	3.10	17.62%
30	17.80	17.88	0.59337	0.59604	20.95	21.03	0.69821	0.70091	3.15	3.15	17.70%	17.62%	3.15	17.65%
40	18.71	18.82	0.46783	0.47048	21.90	22.01	0.54749	0.55018	3.19	3.19	17.05%	16.95%	3.19	16.99%
50	19.62	19.76	0.39250	0.39515	22.85	22.99	0.45706	0.45975	3.23	3.23	16.46%	16.35%	3.23	16.39%
100	24.18	24.45	0.24184	0.24448	27.62	27.89	0.27620	0.27888	3.44	3.44	14.22%	14.07%	3.44	14.13%
200	33.30	33.83	0.16651	0.16914	37.16	37.69	0.18578	0.18844	3.85	3.86	11.56%	11.41%	3.86	11.47%
300	42.42	43.21	0.14140	0.14403	46.69	47.49	0.15563	0.15830	4.27	4.28	10.07%	9.91%	4.28	9.97%
400	51.54	52.59	0.12884	0.13148	56.22	57.29	0.14056	0.14322	4.69	4.70	9.10%	8.94%	4.70	9.00%
500	61.85	62.61	0.12370	0.12522	67.73	68.15	0.13545	0.13630	5.88	5.54	9.51%	8.85%	5.68	9.12%
692	81.65	81.85	0.11799	0.11828	89.81	89.00	0.12979	0.12861	8.16	7.15	9.99%	8.74%	7.57	9.26%
700	82.47	82.65	0.11782	0.11807	90.73	89.86	0.12962	0.12838	8.26	7.21	10.02%	8.72%	7.65	9.26%
750	87.63	87.66	0.11684	0.11688	96.48	95.29	0.12864	0.12706	8.85	7.63	10.10%	8.70%	8.14	9.29%
800	92.79	92.67	0.11598	0.11584	102.23	100.72	0.12779	0.12590	9.45	8.05	10.18%	8.69%	8.63	9.31%
850	97.94	97.68	0.11522	0.11492	107.99	106.15	0.12704	0.12489	10.04	8.47	10.25%	8.67%	9.12	9.33%
900	103.10	102.69	0.11455	0.11410	113.74	111.58	0.12637	0.12398	10.64	8.89	10.32%	8.66%	9.62	9.35%
950	108.25	107.70	0.11395	0.11337	119.49	117.01	0.12578	0.12317	11.24	9.31	10.38%	8.64%	10.11	9.37%
1,000	113.41	112.71	0.11341	0.11271	125.24	122.44	0.12524	0.12244	11.83	9.73	10.43%	8.63%	10.61	9.38%
1,250	139.19	137.76	0.11135	0.11021	154.00	149.59	0.12320	0.11967	14.81	11.82	10.64%	8.58%	13.07	9.44%
1,500	164.97	162.82	0.10998	0.10854	182.75	176.73	0.12183	0.11782	17.78	13.92	10.78%	8.55%	15.53	9.49%
1,750	190.75	187.87	0.10900	0.10735	211.51	203.88	0.12086	0.11650	20.76	16.01	10.88%	8.52%	17.99	9.51%
2,000	216.53	212.92	0.10826	0.10646	240.27	231.03	0.12013	0.11551	23.74	18.11	10.96%	8.51%	20.46	9.54%
2,250	242.31	237.97	0.10769	0.10576	269.02	258.17	0.11957	0.11474	26.71	20.20	11.02%	8.49%	22.91	9.56%
2,500	268.09	263.02	0.10724	0.10521	297.78	285.32	0.11911	0.11413	29.69	22.30	11.07%	8.48%	25.38	9.57%
3,000	319.65	313.12	0.10655	0.10437	355.29	339.61	0.11843	0.11320	35.64	26.49	11.15%	8.46%	30.30	9.59%
3,500	371.21	363.23	0.10606	0.10378	412.80	393.90	0.11794	0.11254	41.59	30.68	11.20%	8.45%	35.23	9.61%
4,000	422.77	413.33	0.10569	0.10333	470.32	448.20	0.11758	0.11205	47.55	34.87	11.25%	8.44%	40.15	9.62%
5,000	525.89	513.54	0.10518	0.10271	585.34	556.78	0.11707	0.11136	59.45	43.25	11.30%	8.42%	50.00	9.64%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "MMA" - Rate Year 3
DISTRICT OF COLUMBIA**

KWH	MRP RY2 RATES				MRP RY3 RATES				INCREASE					
	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)	(\$)	(%)
	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	ANNUAL	ANNUAL
0	13.57	13.99	-	-	3.18	3.60	-	-	-10.39	-10.39	-76.57%	-74.27%	-10.39	-75.21%
100	20.31	21.70	0.20314	0.21699	11.26	12.64	0.11260	0.12645	-9.05	-9.05	-44.55%	-41.71%	-9.05	-42.85%
200	28.79	31.56	0.14397	0.15778	21.08	23.84	0.10538	0.11920	-7.72	-7.72	-26.81%	-24.46%	-7.72	-25.39%
300	37.27	41.42	0.12425	0.13805	30.89	35.03	0.10298	0.11678	-6.38	-6.38	-17.12%	-15.40%	-6.38	-16.07%
400	45.76	51.27	0.11439	0.12818	40.71	46.23	0.10177	0.11557	-5.05	-5.05	-11.04%	-9.85%	-5.05	-10.31%
500	55.70	61.91	0.11139	0.12383	54.46	59.53	0.10892	0.11905	-1.24	-2.39	-2.23%	-3.86%	-1.91	-3.22%
1000	105.40	115.11	0.10540	0.11511	123.21	126.01	0.12321	0.12601	17.81	10.90	16.90%	9.47%	13.78	12.41%
2000	204.81	221.50	0.10241	0.11075	260.72	258.97	0.13036	0.12949	55.90	37.48	27.29%	16.92%	45.16	21.05%
3000	304.23	327.89	0.10141	0.10930	398.22	391.94	0.13274	0.13065	94.00	64.05	30.90%	19.53%	76.53	24.06%
4000	403.64	434.28	0.10091	0.10857	535.73	524.91	0.13393	0.13123	132.09	90.63	32.72%	20.87%	107.91	25.60%
5000	503.05	540.67	0.10061	0.10813	673.24	657.87	0.13465	0.13157	170.19	117.20	33.83%	21.68%	139.28	26.53%
6000	602.46	647.06	0.10041	0.10784	810.74	790.84	0.13512	0.13181	208.28	143.78	34.57%	22.22%	170.66	27.15%
7000	701.87	753.45	0.10027	0.10764	948.25	923.80	0.13546	0.13197	246.37	170.35	35.10%	22.61%	202.03	27.60%
7500	751.58	806.65	0.10021	0.10755	1,017.00	990.28	0.13560	0.13204	265.42	183.64	35.31%	22.77%	217.72	27.78%
8000	801.29	859.84	0.10016	0.10748	1,085.75	1,056.77	0.13572	0.13210	284.47	196.93	35.50%	22.90%	233.41	27.94%
8500	850.99	913.04	0.10012	0.10742	1,154.51	1,123.25	0.13582	0.13215	303.51	210.21	35.67%	23.02%	249.09	28.08%
9000	900.70	966.23	0.10008	0.10736	1,223.26	1,189.73	0.13592	0.13219	322.56	223.50	35.81%	23.13%	264.78	28.20%
9500	950.40	1,019.43	0.10004	0.10731	1,292.01	1,256.22	0.13600	0.13223	341.61	236.79	35.94%	23.23%	280.47	28.31%
10000	1,000.11	1,072.62	0.10001	0.10726	1,360.76	1,322.70	0.13608	0.13227	360.65	250.08	36.06%	23.31%	296.15	28.41%
12500	1,248.64	1,338.60	0.09989	0.10709	1,704.53	1,655.11	0.13636	0.13241	455.89	316.51	36.51%	23.64%	374.59	28.79%
15000	1,497.17	1,604.57	0.09981	0.10697	2,048.29	1,987.53	0.13655	0.13250	551.12	382.95	36.81%	23.87%	453.02	29.04%
17500	1,745.70	1,870.55	0.09975	0.10689	2,392.06	2,319.94	0.13669	0.13257	646.36	449.39	37.03%	24.02%	531.46	29.22%
20000	1,994.23	2,136.53	0.09971	0.10683	2,735.82	2,652.36	0.13679	0.13262	741.59	515.83	37.19%	24.14%	609.90	29.36%
22500	2,242.76	2,402.50	0.09968	0.10678	3,079.59	2,984.77	0.13687	0.13266	836.83	582.27	37.31%	24.24%	688.34	29.47%
25000	2,491.29	2,668.48	0.09965	0.10674	3,423.35	3,317.18	0.13693	0.13269	932.06	648.71	37.41%	24.31%	766.77	29.55%
30000	2,988.35	3,200.43	0.09961	0.10668	4,110.88	3,982.01	0.13703	0.13273	1122.53	781.58	37.56%	24.42%	923.64	29.68%
35000	3,485.41	3,732.38	0.09958	0.10664	4,798.41	4,646.84	0.13710	0.13277	1313.00	914.46	37.67%	24.50%	1080.52	29.77%
40000	3,982.47	4,264.34	0.09956	0.10661	5,485.94	5,311.67	0.13715	0.13279	1503.47	1047.33	37.75%	24.56%	1237.39	29.84%
50000	4,976.59	5,328.24	0.09953	0.10656	6,860.99	6,641.33	0.13722	0.13283	1884.41	1313.09	37.87%	24.64%	1551.14	29.93%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GS ND" - Rate Year 3
DISTRICT OF COLUMBIA**

KWH	MRP RY2 RATES				MRP RY3 RATES				INCREASE					
	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)	(\$)	(%)
	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	ANNUAL	ANNUAL
0	27.42	27.42	-	-	23.47	23.47	-	-	-3.95	-3.95	-14.41%	-14.41%	-3.95	-14.41%
10	28.66	28.59	2.86635	2.85892	24.65	24.63	2.46546	2.46346	-4.01	-3.95	-13.99%	-13.82%	-3.98	-13.89%
20	29.91	29.76	1.49535	1.48792	25.84	25.80	1.29196	1.28996	-4.07	-3.96	-13.61%	-13.31%	-4.01	-13.43%
30	31.15	30.93	1.03835	1.03092	27.02	26.96	0.90079	0.89880	-4.13	-3.96	-13.26%	-12.80%	-4.03	-12.99%
40	32.39	32.10	0.80985	0.80242	28.21	28.13	0.70521	0.70321	-4.19	-3.97	-12.93%	-12.37%	-4.06	-12.61%
50	33.64	33.27	0.67275	0.66532	29.39	29.29	0.58786	0.58586	-4.24	-3.97	-12.61%	-11.93%	-4.08	-12.22%
100	39.85	39.11	0.39855	0.39112	35.32	35.12	0.35316	0.35116	-4.54	-4.00	-11.39%	-10.23%	-4.23	-10.72%
150	46.07	44.96	0.30715	0.29972	41.24	40.94	0.27492	0.27293	-4.83	-4.02	-10.48%	-8.94%	-4.36	-9.59%
200	52.29	50.80	0.26145	0.25402	47.16	46.76	0.23581	0.23381	-5.13	-4.04	-9.81%	-7.95%	-4.49	-8.74%
250	58.51	56.65	0.23403	0.22660	53.08	52.59	0.21234	0.21034	-5.42	-4.07	-9.26%	-7.18%	-4.63	-8.07%
300	64.72	62.50	0.21575	0.20832	59.01	58.41	0.19669	0.19470	-5.72	-4.09	-8.84%	-6.54%	-4.77	-7.52%
400	77.16	74.19	0.19290	0.18547	70.85	70.05	0.17713	0.17514	-6.31	-4.13	-8.18%	-5.57%	-5.04	-6.68%
500	89.59	85.88	0.17919	0.17176	82.70	81.70	0.16540	0.16340	-6.89	-4.18	-7.69%	-4.87%	-5.31	-6.07%
600	102.03	97.57	0.17005	0.16262	94.54	93.35	0.15757	0.15558	-7.48	-4.23	-7.33%	-4.34%	-5.58	-5.62%
700	114.46	109.27	0.16352	0.15610	106.39	104.99	0.15198	0.14999	-8.07	-4.27	-7.05%	-3.91%	-5.85	-5.25%
800	126.90	120.96	0.15862	0.15120	118.23	116.64	0.14779	0.14580	-8.66	-4.32	-6.82%	-3.57%	-6.13	-4.96%
900	139.33	132.65	0.15481	0.14739	130.08	128.29	0.14453	0.14254	-9.25	-4.37	-6.64%	-3.29%	-6.40	-4.73%
1,000	151.77	144.34	0.15177	0.14434	141.93	139.93	0.14193	0.13993	-9.84	-4.41	-6.48%	-3.06%	-6.67	-4.53%
1,250	182.85	173.58	0.14628	0.13886	171.54	169.05	0.13723	0.13524	-11.31	-4.53	-6.19%	-2.61%	-7.36	-4.15%
1,500	213.94	202.81	0.14263	0.13520	201.15	198.16	0.13410	0.13211	-12.78	-4.64	-5.97%	-2.29%	-8.03	-3.87%
1,750	245.02	232.04	0.14001	0.13259	230.77	227.28	0.13187	0.12987	-14.26	-4.76	-5.82%	-2.05%	-8.72	-3.67%
2,000	276.11	261.27	0.13806	0.13063	260.38	256.39	0.13019	0.12820	-15.73	-4.87	-5.70%	-1.86%	-9.40	-3.51%
2,500	338.28	319.73	0.13531	0.12789	319.61	314.63	0.12784	0.12585	-18.67	-5.11	-5.52%	-1.60%	-10.76	-3.29%
3,000	400.46	378.19	0.13349	0.12606	378.84	372.86	0.12628	0.12429	-21.62	-5.34	-5.40%	-1.41%	-12.12	-3.13%
3,500	462.63	436.66	0.13218	0.12476	438.07	431.09	0.12516	0.12317	-24.56	-5.57	-5.31%	-1.28%	-13.48	-3.01%
4,000	524.80	495.12	0.13120	0.12378	497.29	489.32	0.12432	0.12233	-27.51	-5.80	-5.24%	-1.17%	-14.85	-2.93%
5,000	649.15	612.04	0.12983	0.12241	615.75	605.78	0.12315	0.12116	-33.40	-6.26	-5.15%	-1.02%	-17.57	-2.80%
6,000	773.49	728.97	0.12892	0.12149	734.21	722.24	0.12237	0.12037	-39.29	-6.72	-5.08%	-0.92%	-20.29	-2.71%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GS D LV" - Rate Year 3
DISTRICT OF COLUMBIA**

KW	Hours	KWH	MRP RY2 RATES				MRP RY3 RATES				INCREASE			
			\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
			SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
10	100	1000	225.36	231.05	0.22536	0.23105	241.29	245.42	0.24129	0.24542	15.93	14.37	7.07%	6.22%
	200	2000	340.45	351.82	0.17022	0.17591	362.32	370.68	0.18116	0.18534	21.88	18.86	6.43%	5.36%
	300	3000	455.53	472.60	0.15184	0.15753	483.36	495.95	0.16112	0.16532	27.82	23.35	6.11%	4.94%
	400	4000	570.62	593.38	0.14266	0.14834	604.40	621.22	0.15110	0.15530	33.77	27.84	5.92%	4.69%
	500	5000	685.71	714.15	0.13714	0.14283	725.43	746.48	0.14509	0.14930	39.72	32.33	5.79%	4.53%
	600	6000	800.80	834.93	0.13347	0.13915	846.47	871.75	0.14108	0.14529	45.67	36.82	5.70%	4.41%
25	100	2,500	510.64	524.86	0.20426	0.20994	547.94	558.27	0.21918	0.22331	37.30	33.40	7.30%	6.36%
	200	5,000	798.36	826.80	0.15967	0.16536	850.53	871.43	0.17011	0.17429	52.17	44.63	6.53%	5.40%
	300	7,500	1,086.08	1,128.74	0.14481	0.15050	1,153.12	1,184.60	0.15375	0.15795	67.04	55.85	6.17%	4.95%
	400	10,000	1,373.80	1,430.68	0.13738	0.14307	1,455.71	1,497.76	0.14557	0.14978	81.91	67.08	5.96%	4.69%
	500	12,500	1,661.52	1,732.63	0.13292	0.13861	1,758.30	1,810.93	0.14066	0.14487	96.78	78.30	5.82%	4.52%
	600	15,000	1,949.24	2,034.57	0.12995	0.13564	2,060.89	2,124.09	0.13739	0.14161	111.65	89.53	5.73%	4.40%
50	100	5,000	986.11	1,014.55	0.19722	0.20291	1,059.03	1,079.68	0.21181	0.21594	72.92	65.13	7.39%	6.42%
	200	10,000	1,561.55	1,618.43	0.15615	0.16184	1,664.21	1,706.01	0.16642	0.17060	102.66	87.58	6.57%	5.41%
	300	15,000	2,136.99	2,222.32	0.14247	0.14815	2,269.39	2,332.34	0.15129	0.15549	132.40	110.03	6.20%	4.95%
	400	20,000	2,712.43	2,826.20	0.13562	0.14131	2,874.58	2,958.68	0.14373	0.14793	162.15	132.48	5.98%	4.69%
	500	25,000	3,287.87	3,430.08	0.13151	0.13720	3,479.76	3,585.01	0.13919	0.14340	191.89	154.93	5.84%	4.52%
	600	30,000	3,863.31	4,033.96	0.12878	0.13447	4,084.94	4,211.34	0.13616	0.14038	221.63	177.38	5.74%	4.40%
75	100	7,500	1,461.58	1,504.24	0.19488	0.20057	1,570.12	1,601.10	0.20935	0.21348	108.54	96.85	7.43%	6.44%
	200	15,000	2,324.74	2,410.07	0.15498	0.16067	2,477.89	2,540.59	0.16519	0.16937	153.15	130.53	6.59%	5.42%
	300	22,500	3,187.90	3,315.89	0.14168	0.14737	3,385.67	3,480.09	0.15047	0.15467	197.77	164.20	6.20%	4.95%
	400	30,000	4,051.06	4,221.71	0.13504	0.14072	4,293.44	4,419.59	0.14311	0.14732	242.38	197.88	5.98%	4.69%
	500	37,500	4,914.22	5,127.54	0.13105	0.13673	5,201.21	5,359.09	0.13870	0.14291	286.99	231.55	5.84%	4.52%
	600	45,000	5,777.38	6,033.36	0.12839	0.13407	6,108.98	6,298.58	0.13576	0.13997	331.60	265.22	5.74%	4.40%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "MGT LV" - Rate Year 3
DISTRICT OF COLUMBIA**

HOURS USE	KWH	MRP RY2 RATES				MRP RY3 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
MAXIMUM AND ON PEAK DEMAND =													
200	5,000	887.34	887.34	0.17747	0.17747	753.17	753.17	0.15063	0.15063	(134.18)	(134.18)	-15.12%	-15.12%
300	7,500	964.51	964.51	0.12860	0.12860	842.84	842.84	0.11238	0.11238	(121.67)	(121.67)	-12.61%	-12.61%
400	10,000	1,041.68	1,041.68	0.10417	0.10417	932.51	932.51	0.09325	0.09325	(109.16)	(109.16)	-10.48%	-10.48%
500	12,500	1,118.84	1,118.84	0.08951	0.08951	1,022.19	1,022.19	0.08177	0.08177	(96.66)	(96.66)	-8.64%	-8.64%
600	15,000	1,196.01	1,196.01	0.07973	0.07973	1,111.86	1,111.86	0.07412	0.07412	(84.15)	(84.15)	-7.04%	-7.04%
50 KW													
200	10,000	1,317.93	1,317.93	0.13179	0.13179	1,286.76	1,286.76	0.12868	0.12868	(31.16)	(31.16)	-2.36%	-2.36%
300	15,000	1,472.26	1,472.26	0.09815	0.09815	1,466.11	1,466.11	0.09774	0.09774	(6.15)	(6.15)	-0.42%	-0.42%
400	20,000	1,626.59	1,626.59	0.08133	0.08133	1,645.45	1,645.45	0.08227	0.08227	18.86	18.86	1.16%	1.16%
500	25,000	1,780.92	1,780.92	0.07124	0.07124	1,824.80	1,824.80	0.07299	0.07299	43.88	43.88	2.46%	2.46%
600	30,000	1,935.26	1,935.26	0.06451	0.06451	2,004.15	2,004.15	0.06680	0.06680	68.89	68.89	3.56%	3.56%
75 KW													
200	15,000	1,748.51	1,748.51	0.11657	0.11657	1,820.36	1,820.36	0.12136	0.12136	71.85	71.85	4.11%	4.11%
300	22,500	1,980.01	1,980.01	0.08800	0.08800	2,089.38	2,089.38	0.09286	0.09286	109.37	109.37	5.52%	5.52%
400	30,000	2,211.51	2,211.51	0.07372	0.07372	2,358.40	2,358.40	0.07861	0.07861	146.89	146.89	6.64%	6.64%
500	37,500	2,443.00	2,443.00	0.06515	0.06515	2,627.42	2,627.42	0.07006	0.07006	184.41	184.41	7.55%	7.55%
600	45,000	2,674.50	2,674.50	0.05943	0.05943	2,896.43	2,896.43	0.06437	0.06437	221.93	221.93	8.30%	8.30%
100 KW													
200	20,000	2,179.09	2,179.09	0.10895	0.10895	2,353.95	2,353.95	0.11770	0.11770	174.86	174.86	8.02%	8.02%
300	30,000	2,487.76	2,487.76	0.08293	0.08293	2,712.65	2,712.65	0.09042	0.09042	224.89	224.89	9.04%	9.04%
400	40,000	2,796.42	2,796.42	0.06991	0.06991	3,071.34	3,071.34	0.07678	0.07678	274.92	274.92	9.83%	9.83%
500	50,000	3,105.09	3,105.09	0.06210	0.06210	3,430.03	3,430.03	0.06860	0.06860	324.94	324.94	10.46%	10.46%
600	60,000	3,413.75	3,413.75	0.05690	0.05690	3,788.72	3,788.72	0.06315	0.06315	374.97	374.97	10.98%	10.98%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "MGT LV" - Rate Year 3
DISTRICT OF COLUMBIA**

HOURS USE	KWH	MRP RY2 RATES				MRP RY3 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
						MAXIMUM AND ON PEAK DEMAND =				200	KW		
200	40,000	3,901.42	3,901.42	0.09754	0.09754	4,488.34	4,488.34	0.11221	0.11221	586.92	586.92	15.04%	15.04%
300	60,000	4,518.75	4,518.75	0.07531	0.07531	5,205.72	5,205.72	0.08676	0.08676	686.97	686.97	15.20%	15.20%
400	80,000	5,136.08	5,136.08	0.06420	0.06420	5,923.11	5,923.11	0.07404	0.07404	787.02	787.02	15.32%	15.32%
500	100,000	5,753.41	5,753.41	0.05753	0.05753	6,640.49	6,640.49	0.06640	0.06640	887.08	887.08	15.42%	15.42%
600	120,000	6,370.74	6,370.74	0.05309	0.05309	7,357.87	7,357.87	0.06132	0.06132	987.13	987.13	15.49%	15.49%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT LV" - Rate Year 3
DISTRICT OF COLUMBIA**

HOURS USE	KWH	MRP RY2 RATES				MRP RY3 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
MAXIMUM AND ON PEAK DEMAND = 100 KW													
200	20,000	2,216.69	2,216.69	0.11083	0.11083	3,141.88	3,140.68	0.15709	0.15703	925.19	923.99	41.74%	41.68%
300	30,000	2,544.16	2,544.16	0.08481	0.08481	3,484.78	3,483.48	0.11616	0.11612	940.61	939.31	36.97%	36.92%
400	40,000	2,871.63	2,871.63	0.07179	0.07179	3,827.67	3,826.27	0.09569	0.09566	956.04	954.64	33.29%	33.24%
500	50,000	3,199.10	3,199.10	0.06398	0.06398	4,170.56	4,169.06	0.08341	0.08338	971.46	969.96	30.37%	30.32%
600	60,000	3,526.56	3,526.56	0.05878	0.05878	4,513.45	4,511.85	0.07522	0.07520	986.89	985.29	27.98%	27.94%
300 KW													
200	60,000	5,736.56	5,736.56	0.09561	0.09561	7,033.45	7,029.85	0.11722	0.11716	1,296.89	1,293.29	22.61%	22.54%
300	90,000	6,718.97	6,718.97	0.07466	0.07466	8,062.13	8,058.23	0.08958	0.08954	1,343.16	1,339.26	19.99%	19.93%
400	120,000	7,701.37	7,701.37	0.06418	0.06418	9,090.80	9,086.60	0.07576	0.07572	1,389.44	1,385.24	18.04%	17.99%
500	150,000	8,683.77	8,683.77	0.05789	0.05789	10,119.48	10,114.98	0.06746	0.06743	1,435.71	1,431.21	16.53%	16.48%
600	180,000	9,666.17	9,666.17	0.05370	0.05370	11,148.16	11,143.36	0.06193	0.06191	1,481.99	1,477.19	15.33%	15.28%
500 KW													
200	100,000	9,256.43	9,256.43	0.09256	0.09256	10,925.02	10,919.02	0.10925	0.10919	1,668.59	1,662.59	18.03%	17.96%
300	150,000	10,893.77	10,893.77	0.07263	0.07263	12,639.48	12,632.98	0.08426	0.08422	1,745.71	1,739.21	16.02%	15.97%
400	200,000	12,531.10	12,531.10	0.06266	0.06266	14,353.94	14,346.94	0.07177	0.07173	1,822.84	1,815.84	14.55%	14.49%
500	250,000	14,168.44	14,168.44	0.05667	0.05667	16,068.40	16,060.90	0.06427	0.06424	1,899.96	1,892.46	13.41%	13.36%
600	300,000	15,805.78	15,805.78	0.05269	0.05269	17,782.86	17,774.86	0.05928	0.05925	1,977.08	1,969.08	12.51%	12.46%
1,000 KW													
200	200,000	18,056.10	18,056.10	0.09028	0.09028	20,653.94	20,641.94	0.10327	0.10321	2,597.84	2,585.84	14.39%	14.32%
300	300,000	21,330.78	21,330.78	0.07110	0.07110	24,082.86	24,069.86	0.08028	0.08023	2,752.08	2,739.08	12.90%	12.84%
400	400,000	24,605.45	24,605.45	0.06151	0.06151	27,511.78	27,497.78	0.06878	0.06874	2,906.33	2,892.33	11.81%	11.75%
500	500,000	27,880.12	27,880.12	0.05576	0.05576	30,940.70	30,925.70	0.06188	0.06185	3,060.58	3,045.58	10.98%	10.92%
600	600,000	31,154.79	31,154.79	0.05192	0.05192	34,369.62	34,353.62	0.05728	0.05726	3,214.83	3,198.83	10.32%	10.27%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT LV" - Rate Year 3
DISTRICT OF COLUMBIA**

HOURS USE	KWH	MRP RY2 RATES				MRP RY3 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
						MAXIMUM AND ON PEAK DEMAND = 2,000 KW							
200	400,000	35,655.45	35,655.45	0.08914	0.08914	35,385.67	35,385.67	0.08846	0.08846	(269.78)	(269.78)	-0.76%	-0.76%
300	600,000	42,204.79	42,204.79	0.07034	0.07034	41,800.13	41,800.13	0.06967	0.06967	(404.67)	(404.67)	-0.96%	-0.96%
400	800,000	48,754.14	48,754.14	0.06094	0.06094	48,214.58	48,214.58	0.06027	0.06027	(539.56)	(539.56)	-1.11%	-1.11%
500	1,000,000	55,303.48	55,303.48	0.05530	0.05530	54,629.04	54,629.04	0.05463	0.05463	(674.45)	(674.45)	-1.22%	-1.22%
600	1,200,000	61,852.83	61,852.83	0.05154	0.05154	61,043.49	61,043.49	0.05087	0.05087	(809.33)	(809.33)	-1.31%	-1.31%
										4,000 KW			
200	800,000	70,854.14	70,854.14	0.08857	0.08857	70,314.58	70,314.58	0.08789	0.08789	(539.56)	(539.56)	-0.76%	-0.76%
300	1,200,000	83,952.83	83,952.83	0.06996	0.06996	83,143.49	83,143.49	0.06929	0.06929	(809.33)	(809.33)	-0.96%	-0.96%
400	1,600,000	97,051.52	97,051.52	0.06066	0.06066	95,972.40	95,972.40	0.05998	0.05998	(1,079.11)	(1,079.11)	-1.11%	-1.11%
500	2,000,000	110,150.21	110,150.21	0.05508	0.05508	108,801.31	108,801.31	0.05440	0.05440	(1,348.89)	(1,348.89)	-1.22%	-1.22%
600	2,400,000	123,248.90	123,248.90	0.05135	0.05135	121,630.23	121,630.23	0.05068	0.05068	(1,618.67)	(1,618.67)	-1.31%	-1.31%
										6,000 KW			
200	1,200,000	106,052.83	106,052.83	0.08838	0.08838	105,243.49	105,243.49	0.08770	0.08770	(809.33)	(809.33)	-0.76%	-0.76%
300	1,800,000	125,700.86	125,700.86	0.06983	0.06983	124,486.86	124,486.86	0.06916	0.06916	(1,214.00)	(1,214.00)	-0.97%	-0.97%
400	2,400,000	145,348.90	145,348.90	0.06056	0.06056	143,730.23	143,730.23	0.05989	0.05989	(1,618.67)	(1,618.67)	-1.11%	-1.11%
500	3,000,000	164,996.93	164,996.93	0.05500	0.05500	162,973.59	162,973.59	0.05432	0.05432	(2,023.34)	(2,023.34)	-1.23%	-1.23%
600	3,600,000	184,644.96	184,644.96	0.05129	0.05129	182,216.96	182,216.96	0.05062	0.05062	(2,428.00)	(2,428.00)	-1.31%	-1.31%
										8,000 KW			
200	1,600,000	141,251.52	141,251.52	0.08828	0.08828	140,172.40	140,172.40	0.08761	0.08761	(1,079.11)	(1,079.11)	-0.76%	-0.76%
300	2,400,000	167,448.90	167,448.90	0.06977	0.06977	165,830.23	165,830.23	0.06910	0.06910	(1,618.67)	(1,618.67)	-0.97%	-0.97%
400	3,200,000	193,646.27	193,646.27	0.06051	0.06051	191,488.05	191,488.05	0.05984	0.05984	(2,158.23)	(2,158.23)	-1.11%	-1.11%
500	4,000,000	219,843.65	219,843.65	0.05496	0.05496	217,145.87	217,145.87	0.05429	0.05429	(2,697.78)	(2,697.78)	-1.23%	-1.23%
600	4,800,000	246,041.03	246,041.03	0.05126	0.05126	242,803.69	242,803.69	0.05058	0.05058	(3,237.34)	(3,237.34)	-1.32%	-1.32%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT 3A" - Rate Year 3
DISTRICT OF COLUMBIA**

HOURS USE	KWH	MRP RY2 RATES				MRP RY3 RATES				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
						MAXIMUM AND ON PEAK DEMAND =				1,000 KW			
200	200,000	12,291.48	12,289.48	0.06146	0.06145	13,179.87	13,163.87	0.06590	0.06582	888.39	874.39	7.23%	7.11%
300	300,000	14,218.40	14,215.40	0.04739	0.04738	15,338.79	15,319.79	0.05113	0.05107	1,120.39	1,104.39	7.88%	7.77%
400	400,000	16,145.32	16,141.32	0.04036	0.04035	17,497.71	17,475.71	0.04374	0.04369	1,352.39	1,334.39	8.38%	8.27%
500	500,000	18,072.24	18,067.24	0.03614	0.03613	19,656.63	19,631.63	0.03931	0.03926	1,584.39	1,564.39	8.77%	8.66%
600	600,000	19,999.16	19,993.16	0.03333	0.03332	21,815.55	21,787.55	0.03636	0.03631	1,816.39	1,794.39	9.08%	8.98%
										2,000 KW			
200	400,000	24,395.32	24,391.32	0.06099	0.06098	26,167.71	26,135.71	0.06542	0.06534	1,772.39	1,744.39	7.27%	7.15%
300	600,000	28,249.16	28,243.16	0.04708	0.04707	30,485.55	30,447.55	0.05081	0.05075	2,236.39	2,204.39	7.92%	7.81%
400	800,000	32,103.00	32,095.00	0.04013	0.04012	34,803.39	34,759.39	0.04350	0.04345	2,700.39	2,664.39	8.41%	8.30%
500	1,000,000	35,956.84	35,946.84	0.03596	0.03595	39,121.23	39,071.23	0.03912	0.03907	3,164.39	3,124.39	8.80%	8.69%
600	1,200,000	39,810.68	39,798.68	0.03318	0.03317	43,439.07	43,383.07	0.03620	0.03615	3,628.39	3,584.39	9.11%	9.01%
										5,000 KW			
200	1,000,000	60,706.84	60,696.84	0.06071	0.06070	65,131.23	65,051.23	0.06513	0.06505	4,424.39	4,354.39	7.29%	7.17%
300	1,500,000	70,341.44	70,326.44	0.04689	0.04688	75,925.83	75,830.83	0.05062	0.05055	5,584.39	5,504.39	7.94%	7.83%
400	2,000,000	79,976.04	79,956.04	0.03999	0.03998	86,720.43	86,610.43	0.04336	0.04331	6,744.39	6,654.39	8.43%	8.32%
500	2,500,000	89,610.64	89,585.64	0.03584	0.03583	97,515.03	97,390.03	0.03901	0.03896	7,904.39	7,804.39	8.82%	8.71%
600	3,000,000	99,245.24	99,215.24	0.03308	0.03307	108,309.63	108,169.63	0.03610	0.03606	9,064.39	8,954.39	9.13%	9.03%
										7,500 KW			
200	1,500,000	90,966.44	90,951.44	0.06064	0.06063	97,600.83	97,480.83	0.06507	0.06499	6,634.39	6,529.39	7.29%	7.18%
300	2,250,000	105,418.34	105,395.84	0.04685	0.04684	113,792.73	113,650.23	0.05057	0.05051	8,374.39	8,254.39	7.94%	7.83%
400	3,000,000	119,870.24	119,840.24	0.03996	0.03995	129,984.63	129,819.63	0.04333	0.04327	10,114.39	9,979.39	8.44%	8.33%
500	3,750,000	134,322.14	134,284.64	0.03582	0.03581	146,176.53	145,989.03	0.03898	0.03893	11,854.39	11,704.39	8.83%	8.72%
600	4,500,000	148,774.04	148,729.04	0.03306	0.03305	162,368.43	162,158.43	0.03608	0.03604	13,594.39	13,429.39	9.14%	9.03%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT 3A" - Rate Year 3
DISTRICT OF COLUMBIA**

HOURS USE	KWH	PRESENT 'GT-3A'				PROPOSED 'GT- 3A'				INCREASE			
		\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
						MAXIMUM AND ON PEAK DEMAND =				10,000 KW			
200	2,000,000	121,226.04	121,206.04	0.06061	0.06060	130,070.43	129,910.43	0.06504	0.06496	8,844.39	8,704.39	7.30%	7.18%
300	3,000,000	140,495.24	140,465.24	0.04683	0.04682	151,659.63	151,469.63	0.05055	0.05049	11,164.39	11,004.39	7.95%	7.83%
400	4,000,000	159,764.44	159,724.44	0.03994	0.03993	173,248.83	173,028.83	0.04331	0.04326	13,484.39	13,304.39	8.44%	8.33%
500	5,000,000	179,033.64	178,983.64	0.03581	0.03580	194,838.03	194,588.03	0.03897	0.03892	15,804.39	15,604.39	8.83%	8.72%
600	6,000,000	198,302.84	198,242.84	0.03305	0.03304	216,427.23	216,147.23	0.03607	0.03602	18,124.39	17,904.39	9.14%	9.03%
										20,000 KW			
200	4,000,000	242,264.44	242,224.44	0.06057	0.06056	259,948.83	259,628.83	0.06499	0.06491	17,684.39	17,404.39	7.30%	7.19%
300	6,000,000	280,802.84	280,742.84	0.04680	0.04679	303,127.23	302,747.23	0.05052	0.05046	22,324.39	22,004.39	7.95%	7.84%
400	8,000,000	319,341.24	319,261.24	0.03992	0.03991	346,305.63	345,865.63	0.04329	0.04323	26,964.39	26,604.39	8.44%	8.33%
500	10,000,000	357,879.64	357,779.64	0.03579	0.03578	389,484.03	388,984.03	0.03895	0.03890	31,604.39	31,204.39	8.83%	8.72%
600	12,000,000	396,418.04	396,298.04	0.03303	0.03302	432,662.43	432,102.43	0.03606	0.03601	36,244.39	35,804.39	9.14%	9.03%
										30,000 KW			
200	6,000,000	363,302.84	363,242.84	0.06055	0.06054	389,827.23	389,347.23	0.06497	0.06489	26,524.39	26,104.39	7.30%	7.19%
300	9,000,000	421,110.44	421,020.44	0.04679	0.04678	454,594.83	454,024.83	0.05051	0.05045	33,484.39	33,004.39	7.95%	7.84%
400	12,000,000	478,918.04	478,798.04	0.03991	0.03990	519,362.43	518,702.43	0.04328	0.04323	40,444.39	39,904.39	8.44%	8.33%
500	15,000,000	536,725.64	536,575.64	0.03578	0.03577	584,130.03	583,380.03	0.03894	0.03889	47,404.39	46,804.39	8.83%	8.72%
600	18,000,000	594,533.24	594,353.24	0.03303	0.03302	648,897.63	648,057.63	0.03605	0.03600	54,364.39	53,704.39	9.14%	9.04%
										40,000 KW			
200	8,000,000	484,341.24	484,261.24	0.06054	0.06053	519,705.63	519,065.63	0.06496	0.06488	35,364.39	34,804.39	7.30%	7.19%
300	12,000,000	561,418.04	561,298.04	0.04678	0.04677	606,062.43	605,302.43	0.05051	0.05044	44,644.39	44,004.39	7.95%	7.84%
400	16,000,000	638,494.84	638,334.84	0.03991	0.03990	692,419.23	691,539.23	0.04328	0.04322	53,924.39	53,204.39	8.45%	8.33%
500	20,000,000	715,571.64	715,371.64	0.03578	0.03577	778,776.03	777,776.03	0.03894	0.03889	63,204.39	62,404.39	8.83%	8.72%
600	24,000,000	792,648.44	792,408.44	0.03303	0.03302	865,132.83	864,012.83	0.03605	0.03600	72,484.39	71,604.39	9.14%	9.04%

**POTOMAC ELECTRIC POWER COMPANY
AOBA Revision of Pepco Bill Comparisons
SCHEDULE "GT 3B " - Rate Year 3
DISTRICT OF COLUMBIA**

HOURS		MRP RY2 RATES				MRP RY3 RATES				INCREASE			
USE	KWH	\$ AMOUNT OF BILL		\$/KWH		\$ AMOUNT OF BILL		\$/KWH		(\$)	(\$)	(%)	(%)
		SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER	SUMMER	WINTER
MAXIMUM AND ON PEAK DEMAND = 10,000 KW													
200	2,000,000	37,701.78	38,501.78	0.01885	0.01925	13,337.56	14,437.56	0.00667	0.00722	(24,364.22)	(24,064.22)	-64.62%	-62.50%
300	3,000,000	50,440.98	51,240.98	0.01681	0.01708	26,076.76	27,176.76	0.00869	0.00906	(24,364.22)	(24,064.22)	-48.30%	-46.96%
400	4,000,000	63,180.18	63,980.18	0.01580	0.01600	38,815.96	39,915.96	0.00970	0.00998	(24,364.22)	(24,064.22)	-38.56%	-37.61%
500	5,000,000	75,919.38	76,719.38	0.01518	0.01534	51,555.16	52,655.16	0.01031	0.01053	(24,364.22)	(24,064.22)	-32.09%	-31.37%
600	6,000,000	88,658.58	89,458.58	0.01478	0.01491	64,294.36	65,394.36	0.01072	0.01090	(24,364.22)	(24,064.22)	-27.48%	-26.90%
20,000 KW													
200	4,000,000	74,980.18	76,580.18	0.01875	0.01915	26,915.96	29,115.96	0.00673	0.00728	(48,064.22)	(47,464.22)	-64.10%	-61.98%
300	6,000,000	100,458.58	102,058.58	0.01674	0.01701	52,394.36	54,594.36	0.00873	0.00910	(48,064.22)	(47,464.22)	-47.84%	-46.51%
400	8,000,000	125,936.98	127,536.98	0.01574	0.01594	77,872.76	80,072.76	0.00973	0.01001	(48,064.22)	(47,464.22)	-38.17%	-37.22%
500	10,000,000	151,415.38	153,015.38	0.01514	0.01530	103,351.16	105,551.16	0.01034	0.01056	(48,064.22)	(47,464.22)	-31.74%	-31.02%
600	12,000,000	176,893.78	178,493.78	0.01474	0.01487	128,829.56	131,029.56	0.01074	0.01092	(48,064.22)	(47,464.22)	-27.17%	-26.59%
30,000 KW													
200	6,000,000	112,258.58	114,658.58	0.01871	0.01911	40,494.36	43,794.36	0.00675	0.00730	(71,764.22)	(70,864.22)	-63.93%	-61.80%
300	9,000,000	150,476.18	152,876.18	0.01672	0.01699	78,711.96	82,011.96	0.00875	0.00911	(71,764.22)	(70,864.22)	-47.69%	-46.35%
400	12,000,000	188,693.78	191,093.78	0.01572	0.01592	116,929.56	120,229.56	0.00974	0.01002	(71,764.22)	(70,864.22)	-38.03%	-37.08%
500	15,000,000	226,911.38	229,311.38	0.01513	0.01529	155,147.16	158,447.16	0.01034	0.01056	(71,764.22)	(70,864.22)	-31.63%	-30.90%
600	18,000,000	265,128.98	267,528.98	0.01473	0.01486	193,364.76	196,664.76	0.01074	0.01093	(71,764.22)	(70,864.22)	-27.07%	-26.49%
40,000 KW													
200	8,000,000	149,536.98	152,736.98	0.01869	0.01909	54,072.76	58,472.76	0.00676	0.00731	(95,464.22)	(94,264.22)	-63.84%	-61.72%
300	12,000,000	200,493.78	203,693.78	0.01671	0.01697	105,029.56	109,429.56	0.00875	0.00912	(95,464.22)	(94,264.22)	-47.61%	-46.28%
400	16,000,000	251,450.58	254,650.58	0.01572	0.01592	155,986.36	160,386.36	0.00975	0.01002	(95,464.22)	(94,264.22)	-37.97%	-37.02%
500	20,000,000	302,407.38	305,607.38	0.01512	0.01528	206,943.16	211,343.16	0.01035	0.01057	(95,464.22)	(94,264.22)	-31.57%	-30.84%
600	24,000,000	353,364.18	356,564.18	0.01472	0.01486	257,899.96	262,299.96	0.01075	0.01093	(95,464.22)	(94,264.22)	-27.02%	-26.44%

**BEFORE THE
PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA**
Formal Case No. 1156

**Apartment and Office Building Association
Response to Commission Staff
Data Request No. 3**

Commission Staff Request

July 31, 2020

- 3-5. Please refer to AOBA (4A) at 51, lines 13-16. Please provide any estimates of the total revenue under-recovery for GT-LV and MGT-LV classes attributable to transfers of customers between rate classes after the creation of the MGT-LV rate class in FC1150.

AOBA Response

August 7, 2020

AOBA Data Request 7-8 asked Pepco to provide information regarding customers transferred between general service rate classifications by billing month for calendar years 2018 and 2019. The data provided included 4,232 transfers over the period from January 2018 to June 2020. Roughly **80%** of those observations represented customers who were moved from the GT-LV class to the MGT-LV class as part of the creation of the new MGT-LV rate class at the conclusion of Formal Case No. 1150 in August 2018. However, the timing of the Company's reported customer transfers does not appear to track with reported changes in its numbers of customers by rate class in the Company's monthly BSA filings. Since Pepco's monthly BSA calculations are the basis for determining over- and under-collections of revenues, the lack of correspondence between the monthly BSA data and the data provided in response to AOBA Data Request 7-8 impedes AOBA's ability to quantify the revenue impacts of customer transfers.

The following table compares BSA customer count data with the timing of Pepco's reported customer transfers to the MGT-LV rate class following the creation of that class effective August 13, 2018. Pepco's September 10, 2018 Monthly BSA Report showed BSA customer counts for the GT-LV and MGT-LV classes. According to that report Pepco had 257 GT-LV customers and 3,237 MGT-LV in August 2018. However, the Company's response to AOBA Data Request 7-8 suggests that most of those customers were not actually transferred to the MGT-LV class until September and October of 2018, and the number of reported transfers from the GT-LV class to the new MGT-LV class did not reach the 3,237 number reported for the MGT-LV class for August 2018 until December 2018.

Customer Transfers

**BEFORE THE
PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA**
Formal Case No. 1156

**Apartment and Office Building Association
Response to Commission Staff
Data Request No. 3**

	<u>BSA Count of Customers</u>			<u>AOBA DR 7-8 to MGT-LV</u>	
	GT-:LV	MGT-LV	Total	Month	Cumulative
Pre-July 2018				4	4
July 2018	3,487	0	3,487	5	9
August 2018	257	3,237	3,494	7	16
September 2018	259	3,240	3,499	2,673	2,689
October 2018	259	3,254	3,513	534	3,223
November	259	3,260	3,519	5	3,228
December 2018	259	3,264	3,523	9	3,237

The inconsistencies in these data impede AOBA's efforts to quantify the actual impacts of customer transfers on Pepco's Revenues.

Attachment 1 to this response provides an assessment of the changes in Pepco's numbers of customers in its commercial low voltage rate classes during calendar year 2019. Although this analysis was not able to isolate customer transfers, it shows that the Company's authorized annual revenue from those classes was expanded by nearly **\$8.6 million** over that one-year period without any evidence that added or transferred low voltage commercial accounts during that period caused a proportional increase in the Company's overall costs of service for those classes.

Sponsor: Bruce R. Oliver

Potomac Electric Power Company

DC PSC Formal Case No. 1156

Calendar Year 2019 Expansion of Pepco Authorized Annual Revenues

Customer Counts and Revenue per Customer Amounts from Pepco Monthly BSA Filings

						Total Demand-Metered Low Voltage Commercial Service	Total Low Voltage Commercial Total
Month/Year		GSND	GSD-LV	MGT-LV	GT-LV		
Customer Accounts							
December	2018	17,349	5,128	3,264	259	26,000	8,651
December	2019	17,375	5,133	3,286	288	26,082	8,707
Change		26	5	22	29	82	138
Annual Revenue per Customer							
Authorized FC 1150		\$ 777.72	\$ 6,239.09	\$ 23,040.66	\$ 277,461.09		
Annual Authorized Revenue							
December	2018	\$ 451,074	\$ 31,994,054	\$ 75,204,714	\$ 71,862,422	\$ 179,512,264	\$ 179,061,190
December	2019	\$ 451,750	\$ 32,025,249	\$ 75,711,609	\$ 79,908,794	\$ 188,097,402	\$ 187,645,652
Change		\$ 676	\$ 31,195	\$ 506,895	\$ 8,046,372	\$ 8,585,138	\$ 8,584,462

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO AOB A DATA REQUEST NO. 9

QUESTION NO. 2

During the September 10, 2020 Technical Conference Pepco personnel indicated that in the February – March time frame they were informed by a person(s) in another company of problems in the billing determinants that were used in the Company's Original MRP rate design filed on May 30, 2019. Please:

- a. Identify by name, title, and organization the individual(s) who identified the problem for Pepco in the February – March time period;
- b. Document and explain the data and analyses the referenced person(s) from another company used to determine or suggest the existence of a problem in Pepco's billing determinants.
- c. Provide the data, analyses, and workpapers on which Pepco relied to verify the existence of the need for a correction to the billing determinants the Company used to develop the rate designs included in the Company's May 30, 2019 testimony and exhibits.
- d. Explain why the Company did not file an errata for its May 30, 2019 testimony and exhibits.

RESPONSE:

- a. Michael Normand, Manager – Rate Administration (Atlantic City Electric and Delmarva Power) notified Company Witness Blazunas, Manager – Rate Administration (Pepco) of the potential issue with the demand billing determinants in February 2020.
- b. The requested data / analysis does not exist. As stated above, Michael Normand only notified Peter Blazunas of the potential issue with the demand billing determinants.
- c. Refer to FC 1156 AOB A DR 9-2 Attachment.
- d. The Company determined that a more appropriate course of action would be to address the issue as a part of its upcoming rebuttal testimony filing as the Company's rebuttal testimony also included updates to the Company's revenue requirements. The Company commonly updates numbers as a part of rebuttal testimony instead of an errata, as it consolidates numerous changes into a single filing.

SPONSOR: Peter R. Blazunas

Actual Demand from FC 1156 Eratta (Pepco (4F)-6) (Correct Demands)	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
Pepco DC GS-Low Voltage	154,256	159,404	152,237	143,111	155,980	150,622	168,069	162,030	156,817	152,984	145,434	154,478	1,855,422
Pepco DC GS-Primary Svc	240	216	213	191	255	244	203	192	187	224	167	83	2,415
Pepco DC Rapid Transit Svc	59,858	61,683	61,772	64,491	64,457	67,394	68,018	66,004	64,282	64,409	67,759	62,516	772,643
Pepco DC Time Meter GS-High Voltage	28,368	29,282	26,561	28,894	32,652	35,446	32,933	37,015	27,972	37,123	3,874	66,441	386,561
Legacy Pepco DC Time Meter GS-Low Voltage	1,039,120	995,382	970,384	945,985	969,625	928,974	1,042,857	-	-	-	-	-	6,892,327
New Pepco DC Time Meter GS-Low Voltage	-	-	-	-	-	-	-	1,076,698	471,645	408,138	343,671	376,831	2,676,983
Pepco DC Time Meter GS-Primary Svc	354,029	335,350	451,792	324,255	496,947	355,640	522,042	520,479	465,083	468,360	370,383	311,116	4,975,476
New Pepco DC Time Meter Med GS-Low Voltage	-	-	-	-	-	-	-	256	503,224	632,099	545,234	582,259	2,263,072
Grand Total	1,635,871	1,581,317	1,662,959	1,506,927	1,719,916	1,538,320	1,834,122	1,862,674	1,689,210	1,763,337	1,476,522	1,553,724	19,824,899

Sum of Demand	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
Pepco DC GS-Low Voltage	153,963	159,411	152,224	143,044	155,894	150,591	168,025	266,085	207,500	152,836	145,278	154,573	2,009,424
Pepco DC GS-Primary Svc	240	216	214	192	255	244	203	359	186	224	167	83	2,583
Pepco DC Rapid Transit Svc	59,858	61,683	61,772	64,491	64,457	67,394	68,018	66,004	64,282	64,409	67,759	62,516	772,643
Pepco DC Time Meter GS-High Voltage	28,368	29,282	26,561	28,894	32,652	35,446	32,933	37,015	27,972	37,123	3,874	66,442	386,562
Legacy DC Time Meter GS-Low Voltage	-	-	-	-	-	-	-	-	-	-	-	-	-
New Pepco DC Time Meter GS-Low Voltage	406,169	386,866	378,388	368,329	397,459	349,482	388,584	497,004	408,877	390,067	339,756	379,167	4,690,148
Pepco DC Time Meter GS-Primary Svc	354,022	335,347	451,784	324,254	497,688	355,632	522,032	523,597	465,865	468,356	370,381	311,107	4,980,065
New Pepco DC Time Meter Med GS-Low Voltage	632,595	608,529	592,114	577,580	656,306	579,032	651,290	829,334	691,762	650,799	549,101	579,837	7,598,279
Grand Total	1,635,215	1,581,334	1,663,057	1,506,784	1,804,711	1,537,821	1,831,085	2,219,398	1,866,444	1,763,814	1,476,316	1,553,725	20,439,704

VARIANCE	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
Pepco DC GS-Low Voltage	(293)	7	(13)	(67)	(86)	(31)	(44)	104,055	50,683	(148)	(156)	95	154,002
Pepco DC GS-Primary Svc	-	-	1	1	-	-	-	167	(1)	-	-	-	168
Pepco DC Rapid Transit Svc	-	-	-	-	-	-	-	-	-	-	-	-	-
Pepco DC Time Meter GS-High Voltage	-	-	-	-	-	-	-	-	-	-	-	-	1
Legacy DC Time Meter GS-Low Voltage	(1,039,120)	(995,382)	(970,384)	(945,985)	(969,625)	(928,974)	(1,042,857)	-	-	-	-	-	(6,892,327)
New Pepco DC Time Meter GS-Low Voltage	406,169	386,866	378,388	368,329	397,459	349,482	388,584	(579,694)	(62,768)	(18,071)	(3,915)	2,336	2,013,165
Pepco DC Time Meter GS-Primary Svc	(7)	(3)	(8)	(1)	741	(8)	(10)	3,118	782	(4)	(2)	(9)	4,589
New Pepco DC Time Meter Med GS-Low Voltage	632,595	608,529	592,114	577,580	656,306	579,032	651,290	829,078	188,538	18,700	3,867	(2,422)	5,335,207
Grand Total	(656)	17	98	(143)	84,795	(499)	(3,037)	356,724	177,234	477	(206)	1	614,805

Actual v. Billed	97%
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POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO AOA DATA REQUEST NO. 9

QUESTION NO. 3

Please identify each Pepco or PHI employee other than Witness Blazunas who has had substantive involvement in the identification of the alleged billing determinants errors discussed in Witness Blazunas' July 31, 2020 Third Supplemental Testimony and explain the role of each identified individual in the identification and/or correction of the alleged errors.

RESPONSE:

Company Witness Blazunas is the sole Company employee with substantive involvement in the identification of the need for the correction to forecasted demand billing determinants included in the Company's July 28th Errata and July 31st Supplemental Direct Testimonies.

SPONSOR: Peter R. Blazunas

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO AOBA DATA REQUEST NO. 9

QUESTION NO. 7

Please fully document (with the provision of all relevant workpapers, data, and assumptions) and explain the analyses Pepco used to collect actual kW information that allegedly double counted demands in the month(s) where the rate change approved in Formal Case No. 1150 was implemented.

RESPONSE:

Please see FC 1156 OPC DR 61-4 Attachment.

SPONSOR: Peter R. Blazunas

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO STAFF DATA REQUEST NO. 26

QUESTION NO. 1

Please refer to Pepco (6F), pages 2 and 3. Witness Blazunas explained the forecasted demand billing determinants (FDBD) were derived using load factors for each class in the traditional test period. So FDBD in the forecasted MRP year is based on (a) the load factors in test period and (b) the actual kW demand. Please answer the following questions:

- (a) Did Pepco use one year of data (actual kW and kWh in 2018) for each month and each class to project billing determinants (kW) for three years of the MRP period?
- (b) Please explain how Pepco forecasted kW for RY1, RY2 and RY3 for both Original MRP and Enhanced MRP.
- (c) For enhanced MRP, does Pepco also use 2019 actual kW's to project the FDBD or was only 2018 data used?

RESPONSE:

(a) Yes.

(b) Pepco calculated load factors utilizing actual billing determinants for the historical test period and derived forecasted kW through the application of those load factors to forecasted kWh for RY1, RY2, and RY3 of the MRP. Please also see FC 1156 Staff DR 24-24 Attachment O.

(c) The derivation of the load factors utilizes 2018 data.

SPONSOR: Peter R. Blazunas

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO STAFF DATA REQUEST NO. 26

QUESTION NO. 2

Please refer to Pepco (6F), page 5, lines 12-14. The Company estimates an under-recovery of billed distribution revenue for the affected classes equal to be approximately (\$12.7) million per year, and approximately (\$20.8) million in total for the period August 2018 through March 2020. Please confirm that such underestimation would increase to roughly \$30 million for the enhanced MRP for the period August 2018 through December 2020 as stated in Pepco's DR to Staff, DR No. 24-24.

RESPONSE:

Correct.

SPONSOR: Peter R. Blazunas

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO STAFF DATA REQUEST NO. 26

QUESTION NO. 3

Based on Pepco Supplemental exhibits ((6F)-22 at pp. 207 and 213), it appears that two classes, GT-3B and TN have “refund” or “net credits” in RY3 for the enhanced MRP.

- (a) Please confirm.
- (b) Why did Pepco allocate more ERR credit to these two classes so that the rider is more than the revenue requirement for these two classes?
- (c) How did Pepco allocate ERR benefits to various classes? Please explain in detail.

RESPONSE:

(a) Correct.

(b) Pepco allocated the full amount of offset available to a class based on its proposed allocation methodology even if the result was a Rider ERR credit amount in excess of the revenue requirement increase for an individual class. Pepco’s proposal maximizes value to customers by crediting each rate class its full allocated revenue offset derived from each benefit stream.

(c) Offsets associated with the Pause in Regulatory Amortization Expense were allocated to rate classes on the basis of test year regulatory asset amortization expense from the Company’s Class Cost of Service Study (CCOSS). Offsets associated with the Additional Subtraction Modification were allocated to rate classes on the basis of the “STDPLT” allocator from the Company’s CCOSS, consistent with Line 29 ("Reflection of Additional Subtraction Modification") of the Federal and State Tax calculation section of the CCOSS. Offsets associated with the Acceleration of EDIT benefits were allocated to rate classes on the basis of cumulative Rider EDIT credits paid as of 12/31/2019. RY3 offsets provided via Rider ERR were designed to exhaust the available benefits for each rate class. This results in most classes receiving partial offsets in RY3, although a few classes have benefits in excess of their allocated revenue increase.

SPONSOR: Peter R. Blazunas

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO STAFF DATA REQUEST NO. 26

QUESTION NO. 8

Please describe the confirmation, verification or other reviews used to confirm the accuracy of the inputs, values and amounts shown in Pepco's response to AOBA 2-9. [Reference Pepco (7C)-1]

RESPONSE:

All rate design and revenue calculations are developed by the rate administration team and reviewed by peers and the manager of rate administration.

The AOBA 2-9 Attachment workpaper includes two main inputs: customer counts and approved BSA targets. Both these inputs and the resultant revenues were reviewed for accuracy and reasonableness.

SPONSOR: Peter R. Blazunas

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO STAFF DATA REQUEST NO. 26

QUESTION NO. 13

Assuming the Company is granted a change in revenue requirements, please describe all supporting information that will be provided to ensure that the compliance rates are accurate, and all parties can review the Company's calculations and supporting data and original sources.

RESPONSE:

The Company will provide its rate design workpapers in Excel format. Included in the rate design workpapers will be a comparison of distribution revenues calculated using approved distribution rates and actual billing determinants so as to demonstrate that the designed rates yield the Company's proposed level of revenue pursuant to the approved rate design.

SPONSOR: Peter R. Blazunas

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO OPC DATA REQUEST NO. 61

QUESTION NO. 4

Source of Errata. For each source of the data error, please provide in native file format the report(s) and data that were used to calculate the billing determinants for commercial classes with demand charges in Pepco's original application.

RESPONSE:

Please see FC 1156 OPC DR 61-4 Attachment.

SPONSOR: Peter R. Blazunas

DC AB 1-18

Last Executed on 10/5/20

FC 1156

OPC DR 61-4

Attachment

Page 1 of 12

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC GS Non-Demand	
		Large Commercial (DP	Pepco DC GS-Low Voltage	192
		Large Commercial (DP	Pepco DC Residential Svc	
		Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	28368
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	1054729
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	358182
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	59858
		Residential (DP	Pepco DC GS Non-Demand	
		Residential (DP	Pepco DC GS-Low Voltage	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC GS-Low Voltage	153771
		Small Commercial (DP	Pepco DC Time Meter GS-Low Voltage	-15965
		Small Commercial (DP	Pepco DC Time Meter GS-Primary Svc	-4160
		Small Commercial (DP	Pepco DC GS-Primary Svc	240
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
		Small Commercial (DP	Pepco DC Unmetered GS Non Demand	
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	153963
Pepco DC GS-Primary Svc	240
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	59858
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	28368
Pepco DC Time Meter GS-Low Voltage	1038764
Pepco DC Time Meter GS-Primary Svc	354022
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting (blank)	
Grand Total	1635215

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC GS Non-Demand	
		Large Commercial (DP	Pepco DC GS-Low Voltage	14
		Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	29282
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	1006464
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	335347
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	61683
		Residential (DP	Pepco DC GS Non-Demand	
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Temporary or Supplementary Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC GS-Low Voltage	159397
		Small Commercial (DP	Pepco DC Time Meter GS-Low Voltage	-11068
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC GS-Primary Svc	216
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
		Small Commercial (DP	Pepco DC Unmetered GS Non Demand	
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	159411
Pepco DC GS-Primary Svc	216
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	61683
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	29282
Pepco DC Time Meter GS-Low Voltage	995396
Pepco DC Time Meter GS-Primary Svc	335347
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting (blank)	
Grand Total	1581335

DC AB 3-18

Last Executed on 10/5/20

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	26561
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	974834
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	530061
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	61772
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC Time Meter GS-Low Voltage	-4331
		Small Commercial (DP	Pepco DC Time Meter GS-Primary Svc	-78277
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC GS-Low Voltage	152225
		Small Commercial (DP	Pepco DC GS-Primary Svc	214
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
		Small Commercial (DP	Pepco DC Unmetered GS Non Demand	
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

FC 1156
OPC DR 61-4
Attachment
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Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	152225
Pepco DC GS-Primary Svc	214
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	61772
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	26561
Pepco DC Time Meter GS-Low Voltage	970503
Pepco DC Time Meter GS-Primary Svc	451784
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting (blank)	
Grand Total	1663059

DC AB 4-18

Last Executed on 10/5/20

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	28894
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	946073
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	324254
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	64491
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC Time Meter GS-Low Voltage	-166
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC GS-Low Voltage	143044
		Small Commercial (DP	Pepco DC GS-Primary Svc	192
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
		Small Commercial (DP	Pepco DC Unmetered GS Non Demand	
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

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Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	143044
Pepco DC GS-Primary Svc	192
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	64491
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	28894
Pepco DC Time Meter GS-Low Voltage	945907
Pepco DC Time Meter GS-Primary Svc	324254
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting	
(blank)	
Grand Total	1506782

DC AB 5-18

Last Executed on 10/5/20

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	32652
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	1056135
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	497688
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	64457
		Residential (DP	Pepco DC GS Non-Demand	
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC Time Meter GS-Low Voltage	-2370
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC GS-Low Voltage	155895
		Small Commercial (DP	Pepco DC GS-Primary Svc	255
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
		Small Commercial (DP	Pepco DC Unmetered GS Non Demand	
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

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Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	155895
Pepco DC GS-Primary Svc	255
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	64457
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	32652
Pepco DC Time Meter GS-Low Voltage	1053765
Pepco DC Time Meter GS-Primary Svc	497688
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting (blank)	
Grand Total	1804712

DC AB 6-18

Last Executed on 10/5/20

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	35446
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	932060
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	358307
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	67394
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC Time Meter GS-Low Voltage	-3546
		Small Commercial (DP	Pepco DC Time Meter GS-Primary Svc	-2676
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC GS-Low Voltage	150591
		Small Commercial (DP	Pepco DC GS-Primary Svc	244
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
		Small Commercial (DP	Pepco DC Unmetered GS Non Demand	
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

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Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	150591
Pepco DC GS-Primary Svc	244
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	67394
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	35446
Pepco DC Time Meter GS-Low Voltage	928514
Pepco DC Time Meter GS-Primary Svc	355631
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting	
(blank)	
Grand Total	1537820

DC AB 7-18

Last Executed on 10/5/20

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	32933
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	1044798
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	522033
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	68018
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC Time Meter GS-Low Voltage	-4925
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC GS-Low Voltage	168026
		Small Commercial (DP	Pepco DC GS-Primary Svc	203
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
				Pepco DC Unmetered GS Non Demand
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

FC 1156
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Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	168026
Pepco DC GS-Primary Svc	203
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	68018
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	32933
Pepco DC Time Meter GS-Low Voltage	1039873
Pepco DC Time Meter GS-Primary Svc	522033
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting (blank)	
Grand Total	1831086

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	37015
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	1332856
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	523597
		Large Commercial (DP	Pepco DC Time Meter Med GS-Low Voltage	510
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	66004
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC Time Meter GS-Low Voltage	-7027
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC GS-Low Voltage	266086
		Small Commercial (DP	Pepco DC GS-Primary Svc	359
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
		Small Commercial (DP	Pepco DC Unmetered GS Non Demand	
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	266086
Pepco DC GS-Primary Svc	359
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	66004
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	37015
Pepco DC Time Meter GS-Low Voltage	1325829
Pepco DC Time Meter GS-Primary Svc	523597
Pepco DC Time Meter Med GS-Low Voltage	510
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting	
(blank)	
Grand Total	2219400

DC AB 9-18

Last Executed on 10/5/20

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	27972
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	530694
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	465866
		Large Commercial (DP	Pepco DC Time Meter Med GS-Low Voltage	569944
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	64282
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC GS-Low Voltage	207501
		Small Commercial (DP	Pepco DC GS-Primary Svc	186
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
		Small Commercial (DP	Pepco DC Unmetered GS Non Demand	
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

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Attachment
Page 9 of 12

Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	207501
Pepco DC GS-Primary Svc	186
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	64282
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	27972
Pepco DC Time Meter GS-Low Voltage	530694
Pepco DC Time Meter GS-Primary Svc	465866
Pepco DC Time Meter Med GS-Low Voltage	569944
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting	
(blank)	
Grand Total	1866445

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	37123
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	408830
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	468357
		Large Commercial (DP	Pepco DC Time Meter Med GS-Low Voltage	632036
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	64409
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC Residential Svc	
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC GS-Low Voltage	152837
		Small Commercial (DP	Pepco DC GS-Primary Svc	224
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
		Small Commercial (DP	Pepco DC Unmetered GS Non Demand	
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	152837
Pepco DC GS-Primary Svc	224
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	64409
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	37123
Pepco DC Time Meter GS-Low Voltage	408830
Pepco DC Time Meter GS-Primary Svc	468357
Pepco DC Time Meter Med GS-Low Voltage	632036
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting	
(blank)	
Grand Total	1763816

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	3874
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	343640
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	370381
		Large Commercial (DP	Pepco DC Time Meter Med GS-Low Voltage	545199
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	67759
		Residential (DP	Pepco DC GS Non-Demand	
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Temporary or Supplementary Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC Time Meter GS-Low Voltage	18
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC Residential Svc	
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC GS-Low Voltage	145279
		Small Commercial (DP	Pepco DC GS-Primary Svc	167
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
		Small Commercial (DP	Pepco DC Unmetered GS Non Demand	
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	145279
Pepco DC GS-Primary Svc	167
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	67759
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	3874
Pepco DC Time Meter GS-Low Voltage	343658
Pepco DC Time Meter GS-Primary Svc	370381
Pepco DC Time Meter Med GS-Low Voltage	545199
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting (blank)	
Grand Total	1476317

Company Code	State	ADID	Rate Category	Demand (KW)
Potomac Electric Power Co	District of Columbia	Large Commercial (DP	Pepco DC GS-Low Voltage	179
		Large Commercial (DP	Pepco DC Time Meter GS-High Voltage	66442
		Large Commercial (DP	Pepco DC Time Meter GS-Low Voltage	376680
		Large Commercial (DP	Pepco DC Time Meter GS-Primary Svc	311107
		Large Commercial (DP	Pepco DC Time Meter Med GS-Low Voltage	582220
		Public Street Lighting (DP	Pepco DC Metered Street Lights	
		Public Street Lighting (DP	Pepco DC Unmetered Street Lighting	
		Rapid Transit (PE	Pepco DC Rapid Transit Svc	62516
		Residential (DP	Pepco DC GS Non-Demand	
		Residential (DP	Pepco DC Master Metered Account	
		Residential (DP	Pepco DC Residential All Electric Svc	
		Residential (DP	Pepco DC Residential Svc	
		Residential (DP	Pepco DC Temporary or Supplementary Svc	
		Residential (DP	Pepco DC Time Meter Residential Svc	
		Small Commercial (DP	Pepco DC GS-Low Voltage	154394
		Small Commercial (DP	Pepco DC Time Meter GS-Low Voltage	105
		Small Commercial (DP	Pepco DC GS Non-Demand	
		Small Commercial (DP	Pepco DC Residential Svc	
		Small Commercial (DP	Pepco DC Temporary or Supplementary Svc	
		Small Commercial (DP	Pepco DC GS-Primary Svc	83
		Small Commercial (DP	Pepco DC Telecommunications Network Svc	
		Small Commercial (DP	Pepco DC Traffic Signal SVC	
		Small Commercial (DP	Pepco DC Unmetered GS Non Demand	
District of Columbia				
Potomac Electric Power Co				
Overall Totals:				

Row Labels	Sum of Demand (KW)
Pepco DC GS Non-Demand	
Pepco DC GS-Low Voltage	154573
Pepco DC GS-Primary Svc	83
Pepco DC Master Metered Account	
Pepco DC Metered Street Lights	
Pepco DC Rapid Transit Svc	62516
Pepco DC Residential All Electric Svc	
Pepco DC Residential Svc	
Pepco DC Telecommunications Network Svc	
Pepco DC Temporary or Supplementary Svc	
Pepco DC Time Meter GS-High Voltage	66442
Pepco DC Time Meter GS-Low Voltage	376785
Pepco DC Time Meter GS-Primary Svc	311107
Pepco DC Time Meter Med GS-Low Voltage	582220
Pepco DC Time Meter Residential Svc	
Pepco DC Traffic Signal SVC	
Pepco DC Unmetered GS Non Demand	
Pepco DC Unmetered Street Lighting (blank)	
Grand Total	1553726

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
SUPPLEMENTAL RESPONSE TO OPC DATA REQUEST NO. 61

QUESTION NO. 16

Outstanding BSA Balances. When Pepco first became aware that it was accumulating large balances for certain demand customers, did it conduct an audit or investigation to determine the reason for the accumulation? If no, please state so. If yes, please provide copies of all documents related to such audit or investigation, including but not limited to, documents that discuss the scope of the audit or investigation and the results of such audit or investigation.

RESPONSE:

Refer to the Company's response to FC 1156 OPC DR 61-14.

SUPPLEMENTAL RESPONSE:

The Company has not done any audit or investigation related to the BSA deferral balances of commercial classes with demand rate components. See also the Company's response to FC 1156 OPC DR 61-14.

SPONSOR: Peter R. Blazunas

CERTIFICATE OF SERVICE
Formal Case No. 1156

I hereby certify on this 9th day of October 2020, that the attached **Second Supplemental Testimony of Bruce R. Oliver** was filed electronically on behalf of the Apartment and Office Building Association of Metropolitan Washington and copies were sent via electronic mail to the service list below:

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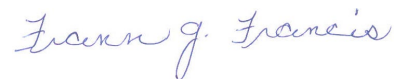
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