

Strategic Pricing Plan

Rates & Contracts July 6, 2017

Agenda		
Rate Change Discussion	1 hour	Cass Larson
Draft Rate Change Letter	1 hour	Cass Larson

TVA

Rate Change Discussion







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Benefits of Rate Restructuring

Essentially ALL "normal" large commercial customers would benefit economically from some amount of on-site solar installations -Based on reasonable assumptions (cost of solar & current rates)

Recommended Rate Restructuring Benefits

- The number of economic installations decrease by $\sim 40\%$
- Loss of fixed cost recovery is minimized by more than 50% ٠

Changes at retail reduce of uneconomic DER penetration across the Valley Changes at wholesale minimize cross-subsidies between LPCs

Modest reductions in rate levels and changes in structure dramatically reduce the risk of stranded cost and cost shifting

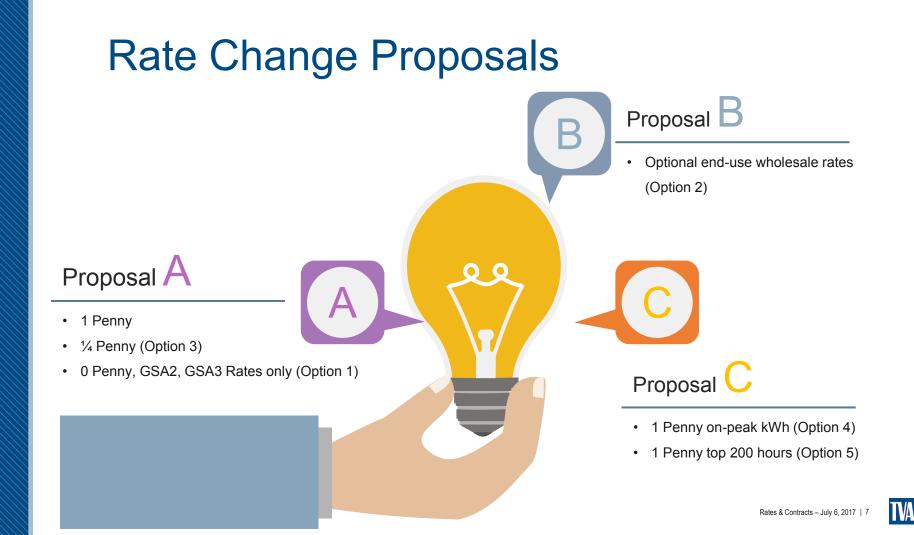


FCR – Where does it come from?

Functions	Costs Included	2012	2013	2014	2015	2016	
Generation Fixed Costs	Operations and Maintenance, Depreciation, Interest	36% \$4,079	42% \$4,608	41% \$4,676	41% \$4,513	40% \$4,292	
Generation	Fuel, Purchased Power	35%	34%	33%	30%	28%	
Variable Costs		\$3,928	\$3,780	\$3,748	\$3,311	\$3,008	
Transmission	Transmission, Ancillary Services	7%	8%	8%	8%	8%	
Transmission	n unsmission, Anemary Services	\$804	\$910	\$926	\$907	\$908	
Other	Corp A&G, Reg. Asset, General	17%	11%	13%	17%	19%	
Fixed Costs	Depreciation, Customer Exp	\$1,907	\$1,252	\$1,413	\$1,882	\$2,113	
Тауаа	D	5%	5%	5%	5%	5%	
Taxes	Payment In Lieu of Taxes	\$622	\$548	\$540	\$525	\$522	
Total Costs		\$11,340	\$11,098	\$11,303	\$11,138	\$10,843	

Specific to TVA's proposal – fixed costs are > \$6.3 B





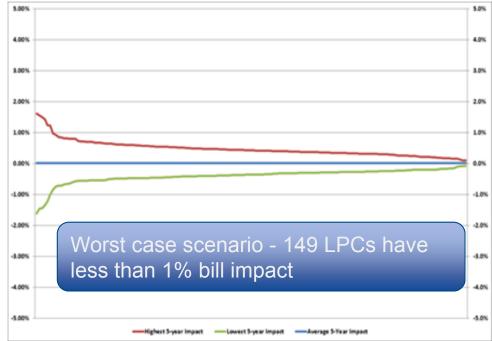
"Proposal A" Comparison & Analysis

Rate Change Discussion – "Penny Proposal"



Terms

- **\$0.0103** / **kWh** / ~ \$1,200 M FCR
- All LPC Bill impacts < 1.61%
- Allocation methodology percentage contribution to the total average standard service energy
- **Reset** no reset until TVA and TVPPA create and apply a methodology, either later in this rate change or in the course of the next rate change
- Default rates TVA will provide optional default rates for standard service classes – LPCs may optout

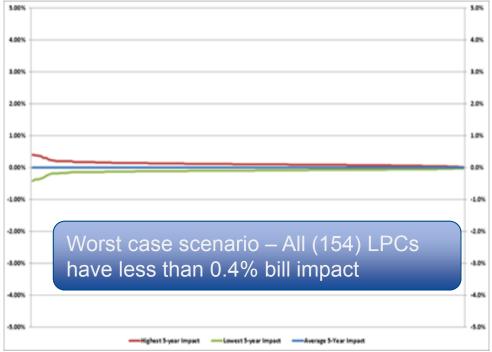


Rate Change Discussion – "1/4 Penny Proposal"

Worst Case (5 Years)
Average Case (5 Years)
Best Case (5 Years)

Terms

- \$0.00258 / kWh / ~ \$300 M FCR
- All LPC bill impacts < 0.4%
- Allocation methodology percentage contribution to the total average standard service energy
- **Reset** no reset until TVA and TVPPA create and apply a methodology, either later in this rate change or in the course of the next rate change
- Default rates TVA will provide default rates for GSA2 / 3 <u>with</u> <u>guidelines</u>



GSA3 Relationships – Penny Proposal

Observations

Currently, GSA3 retail energy rates (green line inclusive of adders) is below wholesale on-peak energy rates in summer and winter.

The proposed wholesale energy rates (purple dashed line) does not solve the mismatch between retail and wholesale energy rates. The problem is solved through retail TOU with energy rates aligned to wholesale.

0.09000 0.0900 0.08000 0.0800 0.07000 0.0700 Current On-Peak **Current On-Peak** 0.06000 0.06000 0.05000 0.04000 0.04000 0.03000 0.03000 0.02000 0.02000 0.01000 0.01000

91 LPC retail energy rates are less than the proposed wholesale on-peak energy rate (Purple dashed line)

2 LPC retail energy rates are less than the proposed wholesale on-peak energy rate (Purple dashed line)

Winter

The Penny Proposal goes a long way toward fixing the impacts of cost shifting



Summer

GSA3 Relationships – 1/4 Penny Proposal

Observations

Currently, GSA3 retail energy rates (green line inclusive of adders) is below wholesale on-peak energy rates in summer and winter.

The proposed wholesale energy rates (purple dashed line) does not solve the mismatch between retail and wholesale energy rates. The problem is solved through retail TOU with energy rates aligned to wholesale.

0.10000 0.10000 0.09000 0.09000 0.0800 0.07000 Current On-Peak **Current On-Peak** 0.0600 0.06000 0.0500 0.04000 0.04000 0.0300 0.02000 0.02000 0.01000 0.0100

138 LPC retail energy rates are less than the proposed Wholesale On-Peak energy rate (Purple dashed line) 80 LPC retail energy rates are less than the proposed Wholesale On-Peak energy rate (Purple dashed line)

Winter

The ¹/₄ Penny Proposal doesn't deter the impacts of cost shifting

Summer



Proposal Comparisons

Terms & Considerations & Suggestions						
Terms	Penny Proposal	1/4 Penny Proposal				
FCR Proposal	\$1,200 M	\$300 M				
Contract Flexibility & Equity Discussion	TVA is willing to engage in separate discussions	TVA is willing to engage in separate discussions				
Fixed Cost Recovery Schedule	See Sep	parate Slide				
Risk Premium	Worst-case scenario over 5 years	No Adjustment				
Reset for loss of load	Per Rules TBD	Not necessary				
Intra-Class Cost Shifting Limits (Retail)	LPC imposed limit No more than 1% to other classes	TVA imposed Limit No more than 2% to other classes				
Hydro-Redesign	TVA Open To Redesign Discussions	Not necessary				

IVA

Comparison of GSA2/3 Retail Rate Designs

	GSA2 / GSA3 Design							
Design	Penny Proposal	1/4 Penny Proposal						
GSA3 Design	LPC Flexibility in Retail Rates TVA recommends a Time of Use Structure with rate alignment, Set Contract Demand Coincidence at 90%, Align energy rates, Introduce Contract Demand Charges Maintain kW & kWh adders	Rate Alignment Design – subject to Re- allocation Limits Time Of Use Structure , Align Retail Energy Prices w/ Wholesale Plus losses Adjust Demand Coincidence Levels Introduce Contract Demand Charges Maintain kW & kWh adders						
GSA2 Design	LPC Flexibility Similar changes as described under GSA3, but for GSA2 Block 2 rates	End Use Style Design Similar changes as described under GSA3, but for GSA2 Block 2 rates NOT Requiring TOU						

Rate designs & results demonstrated in following slides

Comparison of Rate Change Proposals Path Forward

Rate Change Path Forward							
Considerations	Penny Proposal	1/4 Penny Proposal					
Fixed Cost Recovery Schedule	FY2022 Target of \$3,000 M	FY2022 Target of \$3,000 M ??					
	FY2018 – Allocation based on \$1,200 M	FY2018 – Allocation based on \$300 M					
Allocation performed using Standard Service data from 2012 and forward	FY2019 – None	FY2019 - ?					
	FY2020 – based on Allocation up to \$2,400 M	FY2020 - ?					
	FY2021 – based on FY2020 election	FY2021 - ?					
	FY2022 - based on Allocation up to \$3,000 M	FY2022 - ?					

What is Most Effective Way of Mitigating The Effects of DER for GSA 3 (& GSA2)?

Wholesale Level Changes

No Wholesale Changes No Retail Changes	1/4 Penny Proposal No Retail Changes	Penny Proposal No Retail Changes
OPTION 1 (from TVPPA) 0 Penny Proposal Revenue Neutral	OPTION 3 (from TVPPA) 1/4 Penny Proposal Rev. Neutral	Penny Proposal Revenue Neutral
0 Penny Proposal Minor Shift In Revenues	1/4 Penny Proposal Larger Shift in Revenues	TVA CTC Proposal Penny Proposal Minor Shift in Revenues

Wholesale changes address cost shifting across LPCs Retail changes address impacts to individual customers within classes

What is Most Effective Way of Mitigating The Effects of DER for GSA 3 ?

Wholesale Level Changes _____
Minimize Cost Shifting Between LPCs

es DF

ail Level Chang Competitive w/

Retail

More

		Impacts in Millions				
Retail Changes	Impact to:	No Wholesale Changes	<u>1/4 Penny Proposal</u>	Penny Proposal		
No Detail Changes	TVA / All LPCs	(\$51.0)	(\$49.0)	(\$33.0)		
No Retail Changes	Individual LPC	\$2.2	\$1.0	(\$5.8) ==> \$0		
Revenue Neutral W/in Class	TVA / All LPCs	(\$36.0)	(\$31.0)	(\$25.0)		
Nevenue Neutral Wym class	Individual LPC					
TVA Recommended - Minor	TVA / All LPCs	(\$31.0)	(\$25.0)	(\$16.0)		
Revenue Shift	Individual LPC			(\$1.6) ==> \$0		

A combination of wholesale, retail, and reduction in subsidies (where they exist) is the most effective way to address the effects of DER



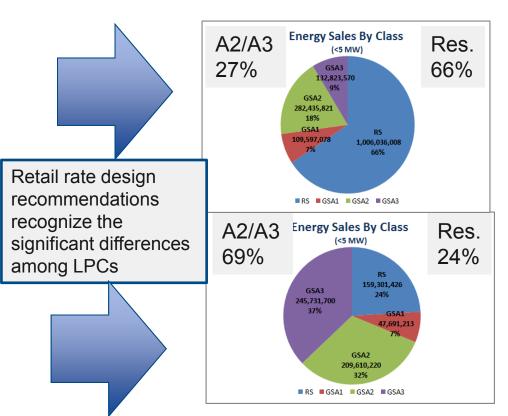
Redesign Considerations & Illustrations

Cooperatives

- Large % of Residential Sales
- Smaller % GSA2 / 3 Sales
- Increased Flexibility
- Opportunity for more aggressive approach to GSA2/3 designs

Municipals

- Smaller % of Residential Sales
- Larger % GSA2 / 3 Sales
- Diminished Flexibility
- Less opportunities for more aggressive approach to GSA2/3 designs



TVA recommends limitations on retail rate redesigns to ensure gradualism

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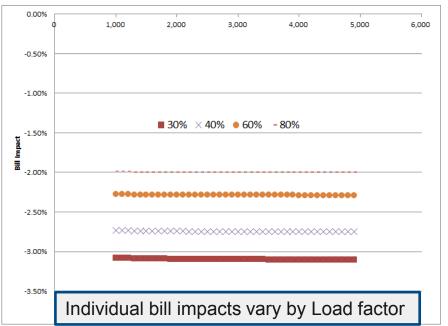
GSA3 Redesign Illustration – ¹/₄ Penny Proposal 2% Reduction in Class Level Revenues

		<u>Summer</u>	<u>Winter</u>	Transition	% Change Summer	
	Customer Charge	\$275.08	\$275.08	\$275.08		
	Customer Charge	\$275.08	\$275.08	\$275.08	0.00%	
	Demand Rate - Block 1	\$13.32	\$12.39	\$12.39		
	Demand Rate - Block 1	\$11.52	\$10.74	\$10.74	-13.51%	
						Reductions in
	Demand Rate - Block 2	\$15.32	\$14.39	\$14.39		Demand Rates
	Demand Rate - Block 2	\$11.52	\$10.74	\$10.74	-24.80%	Domana ratoo
New - Contract						
	Contract Demand Charge	\$0.00	\$0.00	\$0.00		
Demand Rate	Contract Demand Charge	\$0.86	\$0.86	\$0.86	N/A	
	Energy Rate - Onpeak	\$0.04	\$0.04	\$0.04		New - Aligned
	Energy Rate - On-Peak	\$0.06	\$0.05	\$0.04	39.58%	-
						TOU Rate
	Energy Rate - Onpeak	\$0.04	\$0.04	\$0.04		Structures
Current	Energy Rate - Off-Peak	\$0.04	\$0.04	\$0.04	-11.30%	Oliuciules
Proposed						

Reduction in wholesale energy of ¹/₄ cent plus retail re-design and reduce subsidies

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GSA3 Redesign & Customer Level Bill Impacts – ¹/₄ Penny Proposal – 2% Red.



Small Rev. Reduction removes the bill impacts to higher load factor customers (Assumes 85% Coincidence) but does not address (as well) DER.

Billing Parameter	Current	Proposed	Change	%Change
Customer	\$111,132	\$111,132	\$0	0%
Demand Block 1	\$4,600,268	\$3,984,409	(\$615,859)	-13%
Demand Block 2	\$2,549,732	\$1,908,785	(\$640,947)	-25%
Contract Demand	\$0	\$616,055	\$616,055	N/A
On-Peak Energy	\$0	\$2,671,820	\$2,671,820	N/A
Off-Peak Energy	\$0	\$7,932,035	\$7,932,035	N/A
Total Energy	\$10,312,241	\$10,603,855	\$291,614	3%
Grand Total	\$17,573,373	\$17,224,236	(\$349,137)	-2.00%

Although better, this design does not limit transfers between LPCs

GSA3 Redesign & Revenue Impacts – Impacts – ¹/₄ Penny Proposal – 2% Reduction

	Optional Reallocation to Residential or	GSA		
Assignment percentage to RS	70%			\$244,396
Assignment percentage to GSA1	30%			\$104,741
	GSA3 Reallocation to Residential			
Residential Revenue				\$18,098,241
Reallocation Amount to Residenti	al			\$244,396
				1.4%
	Increase if Applied to Residential	\$244,396	\$244,396	
	Customer Units	142,582	159,301,426	
)
	Per Residential Monthly Customer Impact	\$1.71	\$0.00153	(either/9r)
		Inc to CC	Inc to kWh	
	GSA3 Reallocation to GSA1			
GSA1 Current Revenue				\$5,620,012
Reallocation Amount to GSA1				\$104,741
				1.9%
	Increase if Applied to GSA1	\$104,741	\$104,741	
	Customer Units	25,866	47,691,213	
	Per GSA1 Monthly Customer Impact	\$4.05	\$0.00220	(either / or)
		Inc to CC	Inc to kWh	

Although there is an overall class reduction of 2%, the revenue shift and impact to other customers is held to a minimum.

In this example, Residential impact of 1.4%. Results in less than \$2 per customer or 1.5 mill / kwh.

Spectrum of Redesign Illustrations 1/4 Penny Proposal

Customer A - Coop Heavy Residential

GSA3 - 10% Reduction

- **90%** of revenue shift to Residential 0.7% increase
- Customer Impact \$1.18 increase to Customer Charge, or
- \$0.00087 increase per kWh
- **10%** of revenue shift to GSA-1 0.6% increase
- Customer Impact
 - \$0.80 increase to Customer Charge, or
 - \$0.00089 increase per kWh

Customer B - Muni Heavy GSA2/3

GSA3 - 1.0% Reduction

- 70% of revenue shift to Residential – 0.7% increase
 - Customer Impact **\$1.71** increase to Customer Charge, or
 - \$0.00153 increase per kWh
- **30%** of revenue shift to GSA-1 1.9% increase
- Customer Impact
 - **\$4.05** increase to Customer Charge, or
 - **\$0.0022** increase per kWh

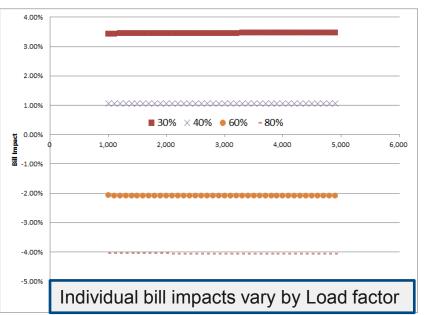
GSA3 Redesign Illustration – Penny Proposal 1% Reduction

		<u>Summer</u>	Winter	Transition	% Change Summer	
	Customer Charge	\$275.08	\$275.08	\$275.08		
	Customer Charge	\$275.08	\$275.08	\$275.08	0.00%	
	Demand Rate - Block 1	\$13.32	\$12.39	\$12.39		
	Demand Rate - Block 1	\$12.07	\$11.24	\$11.24	-9.38%	Reductions in
	Demand Rate - Block 2	\$15.32	\$14.39	\$14.39		Demand Rates
	Demand Rate - Block 2	\$12.07	\$11.24	\$11.24	-21.21%	
New - Contract	Contract Demand Charge	\$0.00	\$0.00	\$0.00		
Demand Rate	Contract Demand Charge	\$3.43	\$3.43	\$3.43	N/A	
Bonnand Flato						
	Energy Rate - Onpeak	\$0.04	\$0.04	\$0.04		NL. Alternal
	Energy Rate - On-Peak	\$0.05	\$0.04	\$0.03	21.67%	New - Aligned
0						TOU Rate
Current	Energy Rate - Onpeak	\$0.04	\$0.04	\$0.04		Structures
Proposed	Energy Rate - Off-Peak	\$0.03	\$0.03	\$0.03	-29.23%	

Reduction in wholesale energy of $\frac{1}{4}$ cent plus retail re-design and reduction – 1%



GSA3 Redesign & Customer Level Bill Impacts – Penny Proposal – 1% Reduction



The Penny proposal combined with modest revenue reduction more appropriately addresses DER (higher load factor customers)

Billing Parameter	Current	Proposed	Change	%Change
Customer	\$111,132	\$111,132	\$0	0%
Demand Block 1	\$4,600,268	\$4,171,595	(\$428,673)	-9%
Demand Block 2	\$2,549,732	\$1,998,571	(\$551,161)	-22%
Contract Demand	\$0	\$2,457,058	\$2,457,058	N/A
On-Peak Energy	\$0	\$2,266,519	\$2,266,519	N/A
Off-Peak Energy	\$0	\$6,385,514	\$6,385,514	N/A
Total Energy	\$10,312,241	\$8,652,033	(\$1,660,208)	-16%
Grand Total	\$17,573,373	\$17,390,389	(\$182,984)	-1.00%

This design does a better job limiting cost shifting among LPCs and more adequately addresses DER by targeting energy intensive customers.

GSA3 Redesign & Revenue Impacts – Penny Proposal – 1% Reduction

Optional Reallocation to Residential or GSA								
Assignment percentage to RS	70%			\$128,089				
Assignment percentage to GSA1	30%			\$54,895				
	GSA3 Reallocation to Residential							
Residential Revenue				\$18,098,241				
Reallocation Amount to Residential				\$128,089				
				0.7%				
	Increase if Applied to Residential	\$128,089	\$128,089					
	Customer Units	142,582	159,301,426	\backslash				
)				
	Per Residential Monthly Customer Impact	\$0.90	\$0.00080	(either / or)				
		Inc to CC	Inc to kWh					
	GSA3 Reallocation to GSA1							
GSA1 Current Revenue				\$5,620,012				
Reallocation Amount to GSA1				\$54,895				
				1.0%				
	Increase if Applied to GSA1	\$54,895	\$54,895					
	Customer Units	25,866	47,691,213					
	Per GSA1 Monthly Customer Impact	\$2.12	\$0.00115	(either / or)				
		Inc to CC	Inc to kWh					

Although there is an overall class reduction of 1%, the revenue shift and impact to other customers is held to a minimum.

In this example, Residential impact of 0.7%. Results in less than \$1 per customer or 1 mill / kwh.

Spectrum of Redesign Illustrations Penny Proposal



GSA3 - 8.8% Reduction

- **90%** of revenue shift to Residential 0.7% increase
- Customer Impact \$1.04 increase to Customer Charge, or
- \$0.00077 increase per kWh
- **10%** of revenue shift to GSA-1 0.6% increase
- Customer Impact
 - \$0.70 increase to Customer Charge, or
 - \$0.00078 increase per kWh

Customer B - Muni Heavy GSA2/3

GSA3 - 1.0% Reduction

- **70%** of revenue shift to Residential 0.7% increase
 - Customer Impact **\$0.90** increase to Customer Charge, or
 - \$0.00080 increase per kWh
- **30%** of revenue shift to GSA-1 1.0% increase
- Customer Impact
 - **\$2.12** increase to Customer Charge, or
 - \$0.00115 increase per kWh

Equalization for Pricing of Manufacturing Customers

Perceived Concerns – LPC concerns over GSA3 (with/without the SMC) vs. TDMSA (TDGSA) rates

Background:

- In 2009, at the request of TVPPA, there was a request for "more competitive GSA3 rates".
- TDMSA/TDGSA were introduced as optional wholesale rates
- Currently TDMSA / TDGSA offered by 110 LPCs

LPC Concerns:

- Delivery adders intended to be GSA3 (some LPCs have elected "B" class adders)
- Lost Margin Today, most GSA3 Demand rates have Enhanced Power Cost Recovery
 - Power cost recovery from pre-rate change
 - Rates reflect >= 100% coincidence assumptions

TVA's proposed approach to GSA3 rates would equalize pricing

TVAPPA Response – June 9, 2017

TVPPA Rates & Contracts Committee

Comments to TVA

June 9, 2017

- We need more time to finalize details of a complete counterproposal.
- If we agree to a fixed cost component in the rate structure, we need to understand exactly what is allocated into that component.
- In order to move forward in considering this fixed cost component, we need agreement that TVA will enter into serious discussions related to contract flexibility, equity and equalization of pricing for manufacturing customers.
 - To signify TVA's commitment to equity discussions, they will collaborate to provide a joint legal opinion regarding the process that must be executed to engage in affecting change to existing equity potential
- We recognize that TVA will look for a mechanism to insure that implementation of retail rate changes for GSA-2 and 3 are coincident with the wholesale rate change

Elements of Agreement

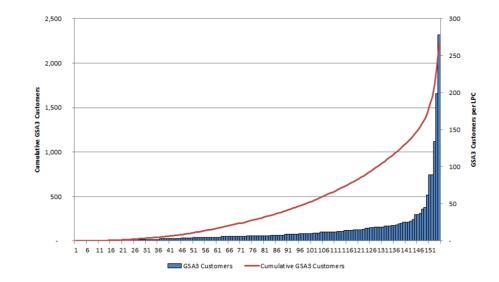
- 5-year annual average of most recent 5 years of total Standard Service kWh at wholesale, multiplied by 0.25/kWh for a dollar amount of approximately \$300 million of total fixed cost.
- There needs to be an established timeframe to assess and reallocate each LPCs portion of the fixed cost component, regardless of rate change schedule.
 - Concentrate on GSA-2 and 3, taking Residential and GSA-1 off the table at this time.

GSA3 and Local Power Companies

Overall, there are ~ 2,300 GSA3 customers 50% of the GSA3s are with 13 LPCs

There are ~ 100 LPCs with 10 GSA3s or less

Currently, 80% of LPCs offer a time of use rate to their customers (but with minimal subscription)

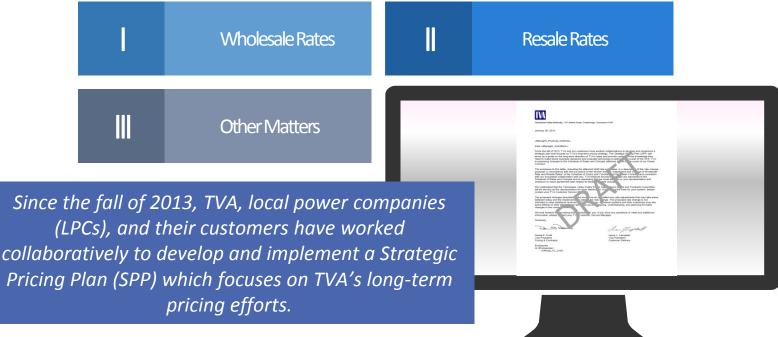


Data Source: ESS as of 12 months ending September 30, 2016

Draft Rate Change Letter

Rate Change Letter Guide

The Rate Change Letter captures the changes we are considering and begins the 180 day negotiation period



Rates & Contracts – July 6, 2017

This is intended to serve as a guide to, and not a substitute for, the draft rate change letter - to the extent they do not agree, the draft rate change letter prevails



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I. Wholesale Rates – Section 1

Reduce Standard Service energy charges and introduce a new wholesale fixed-cost recovery (FCR) charge on a revenue-neutral basis. ...TVA and TVPPA will meet and endeavor to reach agreement on one of the proposed wholesale designs presented...



I. 1(a) FCR Allocation Methodology Option
 A: FCR allocated to each LPC based on each LPC's percentage contribution to the total
 TVA standard service energy usage during a historical baseline period



I. 1(para 2) – TVA will consider other FCR allocation methodologies jointly developed with TVPPA.



I. 1(b) - FCR Allocation Methodology Option B: FCR allocated based on a contract demand determined



I. 1(c) - FCR Allocation Methodology Option C: FCR allocated to each LPC based on its share of capacity cost allocations relative to the 2015/2016 COS

Rates & Contracts - July 6, 2017

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I. Wholesale Rates – Section 2-9



I. 2 - Improve wholesale FCR for Large Customers by implementing a new contract demand charge



I. 6 - Decrease wholesale GSB, GSC and GSD rates. Increase Standard Service and/or MSB, MSC, and MSD rates to maintain revenue neutrality.



I. 3 - Move standard service Hydro Allocation Adjustment debit and credit amounts from the wholesale schedule to the adjustment addendum



I. 7 - Roll adjustment addendum amounts, including the Environmental Adjustment, into the base rates



I. 4 - Move Large Customer **Hydro Allocation Adjustment** amounts, which are currently embedded in the base rates, to the adjustment addendum



I. 5 – Consider changes to the Hydro Allocation Adjustment demand and energy debit/credit methodology with a focus on residential customer impacts.



I. 8 - Eliminate or phase out mid-month billing



I. 9 - Change fuel cost adjustment allocation methodology to more precisely factor large manufacturing-class customers.

Rates & Contracts - July 6 2017



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II. Resale Rates

To enable LPCs to continue operating on a financially sound basis after the wholesale rate change, TVA will make the following changes to resale rate schedules:



II. 1 - Change **resale rates** to reflect changes in wholesale power costs



II. 4 - Roll adjustment addendum amounts, **including the Environmental Adjustment**, into the base resale rates



II. 2 - Align new wholesale FCR charges with retail. Address timing as new contract demand charges will require customer care.



II. 5 - Increase resale rates to account for worst case LPC bill impacts



II. 3 - Move **hydro allocation** adjustment amounts which are currently embedded in the base resale rates, to the **adjustment addendum**

Rates & Contracts – July 6, 2017

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III. Other Matters

Explore additional opportunities to provide simplicity and process improvement



III. 1 – Correct and generalize **ESS reporting** contract provisions to fix outdated references



III. 3 - Combine the six general and manufacturing **B**, **C**, and **D** rate schedules into two documents (does not affect rates)



III. 2 - Revise part B of the **Outdoor Lighting** rate schedule to implement a formula eliminating the need to process an LRA to update the fixture charges.



III. 4 - Rebalance the **hydro allocation debit and credit** amounts to account for changes between residential and commercial customer class characteristics

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Rates & Contracts - July 6, 2017

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Appendix

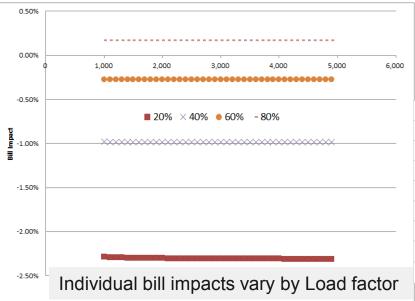
GSA3 Redesign Illustration – 0 Penny Proposal Revenue Neutral

	Revenue Neutral - No Change at Wholesale					
		<u>Summer</u>	<u>Winter</u>	Transition	% Change Summer	
	Customer Charge	\$275.08	\$275.08	\$275.08		
	Customer Charge	\$275.08	\$275.08	\$275.08	0.00%	
	Demand Rate - Bloc	\$13.32	\$12.39	\$12.39		
	Demand Rate - Bloc	\$12.52	\$11.65	\$11.65	-6.01%	Reductions in
						Demand Rates
	Demand Rate - Bloc	\$15.32	\$14.39	\$14.39		Demanu Rales
	Demand Rate - Bloc	\$12.52	\$11.65	\$11.65	-18.28%	
No Contract						
Demand Rate	Contract Demand C	\$0.00	\$0.00	\$0.00		
	Contract Demand C	\$0.00	\$0.00	\$0.00	N/A	
	Energy Rate - Onpe	\$0.04434	\$0.04126	\$0.03994		New - Aligned
	Energy Rate - On-Pe	\$0.06381	\$0.05336	\$0.04383	43.91%	TOU Rate
Current						Structures
	Energy Rate - Onpe	\$0.04434	\$0.04126	\$0.03994		
Proposed	Energy Rate - Off-P	\$0.04124	\$0.04310	\$0.04383	-6.99%	

Simply redesigning retail rates with no changes at wholesale



GSA3 Redesign & Customer Level Bill Impacts – 0 Penny – Revenue Neutral



Rev. Neutral approach causes higher bill impacts for higher load factor customers (Assumes 94% Coincidence)

Billing Parameter	Current	Proposed	Change	%Change
Customer	\$111,132	\$111,132	\$0	0%
Demand Block 1	\$4,600,268	\$4,343,064	-\$257,204	-6%
Demand Block 2	\$2,549,732	\$2,080,770	-\$468,962	-18%
Contract Demand	\$0	\$ 0	\$0	N/A
On-Peak Energy	\$0	\$2,769,828	\$2,769,828	N/A
Off-Peak Energy	\$0	\$8,305,120	\$8,305,120	N/A
Total Energy	\$10,312,241	\$11,074,948	\$762,707	7%
Grand Total	\$17,573,373	\$17,609,914	\$36,541	0.2%

Rate designed to be Revenue Neutral by class; individual bill impacts vary

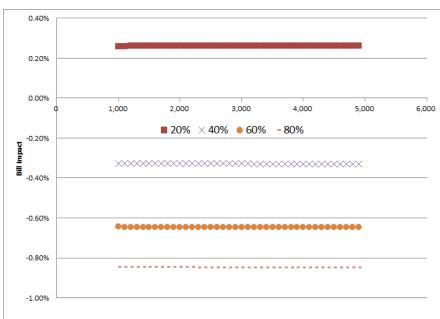
GSA3 Redesign Illustration – ¹/₄ Penny Proposal Revenue Neutral

	1/4 Penny Proposal Revenue Neutral					
		<u>Summer</u>	Winter	Transition	% Change Summer	
	Customer Charge	\$275.08	\$275.08	\$275.08		
	Customer Charge	\$275.08	\$275.08	\$275.08	0.00%	
	Demand Rate - Bloc	\$13.32	\$12.39	\$12.39		
	Demand Rate - Bloc	\$12.52	\$11.65	\$11.65	-6.01%	Reductions in
	Demand Rate - Bloc	\$15.32	\$14.39	\$14.39		Demand Rates
	Demand Rate - Bloc	\$12.52	\$11.65	\$11.65	-18.28%	
New - Contract						
Demand Rate	Contract Demand C	\$0.00	\$0.00	\$0.00		
	Contract Demand C	\$0.86	\$0.86	\$0.86	N/A	
	Energy Rate - Onpe	\$0.04434	\$0.04126	\$0.03994		New - Aligned
	Energy Rate - On-Pe	\$0.06124	\$0.05079	\$0.04126	38.11%	TOU Rate
Current						Structures
Current	Energy Rate - Onpe	\$0.04434	\$0.04126	\$0.03994		Siluciules
Proposed	Energy Rate - Off-P	\$0.03868	\$0.04053	\$0.04126	-12.76%	

Reduction in wholesale energy of 1/4 cent plus revenue neutral retail re-design



GSA3 Redesign & Customer Level Bill Impacts – ¹/₄ Penny Proposal – Rev. Neut.



Rev. Neutral approach causes higher bill impacts for higher load factor customers (Assumes 94% Coincidence)

Billing Parameter	Current	Proposed	Change	%Change
Customer	\$111,132	\$111,132	\$0	0%
Demand Block 1	\$4,600,268	\$4,324,963	-\$275,304	-6%
Demand Block 2	\$2,549,732	\$2,072,128	-\$477,604	-19%
Contract Demand	\$0	\$616,055	\$616,055	N/A
On-Peak Energy	\$0	\$2,638,641	\$2,638,641	N/A
Off-Peak Energy	\$0	\$7,805,489	\$7,805,489	N/A
Total Energy	\$10,312,241	\$10,444,129	\$131,889	1%
Grand Total	\$17,573,373	\$17,568,409	-\$4,965	0.0%

Overall Rate Design is Revenue Neutral, Individual bill impacts range around +/- 0.5%

GSA3 Redesign Illustration – Penny Proposal **Revenue Neutral**

		Penny Proposal Revenue Neutral				
		Summer	Winter	Transition	Change Summe	
	Customer Char	\$275.08	\$275.08	\$275.08		
	Customer Char _{	\$275.08	\$275.08	\$275.08	0.00%	
	Demand Rate -	\$13.32	\$12.39	\$12.39		
	Demand Rate -	\$12.57	\$11.70	\$11.70	-5.63%	
	Demand Rate -	\$15.32	\$14.39	\$14.39		
New - Contract	Demand Rate -	\$12.57	\$11.70	\$11.70	-17.95%	
	L					
Demand Rate	Contract Demar	\$0.00	\$0.00	\$0.00		
	Contract Demar	\$3.43	\$3.43	\$3.43	N/A	
	Energy Rate - O	\$0.04434	\$0.04126	\$0.03994		
-	Energy Rate - O	\$0.05366	\$0.04321	\$0.03368	21.02%	
Current						
Proposed	Energy Rate - O	\$0.04434	\$0.04126	\$0.03994		
	Energy Rate - O	\$0.03109	\$0.03295	\$0.03368	-29.88%	

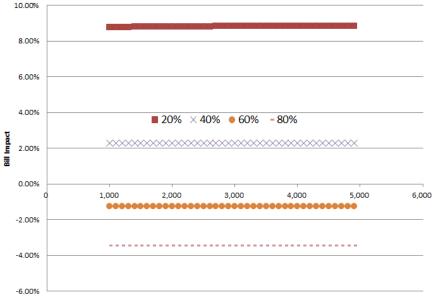
Reductions in **Demand Rates**

New - Aligned TOU Rate **Structures**

Reduction in wholesale energy of ¹/₄ cent plus revenue neutral retail re-design



GSA3 Redesign & Customer Level Bill Impacts – Penny Proposal – Rev. Neut.



Rev. Neutral approach causes higher bill impacts for Lower load factor customers (Assumes 95% Coincidence)

Current	Proposed	Change	%Change
\$111,132	\$111,132	\$0	0%
\$4,600,268	\$4,343,064	-\$257,204	-6%
\$2,549,732	\$2,080,770	-\$468,962	-18%
\$ 0	\$2,457,058	\$2,457,058	N/A
\$ 0	\$2,251,205	\$2,251,205	N/A
\$0	\$6,327,108	\$6,327,108	N/A
\$10,312,241	\$8,578,314	-\$1,733,927	-17%
\$17,573,373	\$17,570,337	-\$3,036	0.0%
	\$111,132 \$4,600,268 \$2,549,732 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$111,132 \$111,132 \$4,600,268 \$4,343,064 \$2,549,732 \$2,080,770 \$0 \$2,457,058 \$0 \$2,251,205 \$0 \$6,327,108 \$10,312,241 \$8,578,314	\$111,132 \$111,132 \$0 \$4,600,268 \$4,343,064 -\$257,204 \$2,549,732 \$2,080,770 -\$468,962 \$0 \$2,457,058 \$2,457,058 \$0 \$2,251,205 \$2,251,205 \$0 \$6,327,108 \$6,327,108 \$10,312,241 \$8,578,314 -\$1,733,927

Rate designed to be Revenue Neutral by class; individual bill impacts vary