

Application No.: A.19-09-014

Exhibit No.: SDG&E-

Witness: Neetu Malik

**PREPARED REBUTTAL TESTIMONY OF
NEETU MALIK
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

JANUARY 8, 2020

TABLE OF CONTENTS

I.	OVERVIEW AND PURPOSE.....	1
II.	SEASONALLY DIFFERENTIATED RATES CREATE SIGNIFICANT BILL VOLATILITY AND CUSTOMER CONFUSION	2
III.	INTERVENORS POINT TO SMALL PERCENTAGE OF CUSTOMERS IGNORING BENEFITS TO THE VAST MAJORITY	3
	A. Cal PA Testimony.....	3
	B. CforAT Testimony.....	8
	C. TURN Testimony.....	9
IV.	SEASONALLY DIFFERENTIATED RATES SHOULD BE ELIMINATED BY SUMMER OF 2020 TO PROVIDE RELIEF FROM HIGH SUMMER BILLS	11

**PREPARED REBUTTAL TESTIMONY OF
NEETU MALIK
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

I. OVERVIEW AND PURPOSE

The purpose of this Rebuttal Testimony is to respond to testimony submitted by intervening parties in San Diego Gas & Electric Company’s (“SDG&E”) Application (“A.”) 19-09-014 to eliminate seasonal differentials in residential rates by the summer of 2020 (“Application”). My rebuttal testimony¹ reaffirms justifications for the elimination of seasonally differentiated rates and responds to intervening parties’ policy, as well as other arguments, as presented in intervening parties’ prepared testimony. Specifically, I will address the prepared testimony of the following intervening parties:²

- The Public Advocates Office (“Cal PA”) witnesses Nathan Chau and Alan M. Siebuhr;
- The Center for Accessible Technology (“CforAT”) witness Melissa Kasnitz; and
- The Utility Reform Network (“TURN”) witness David Cheng.

My testimony refers to these parties collectively as the “Intervenors.”

My testimony is organized as follows:

Section II – Seasonally Differentiated Rates Create Significant Bill Volatility and Customer Confusion

Section III – Intervenors Point To Small Percentages of Customers Ignoring Benefits To The Vast Majority

¹ I submitted prepared direct testimony in support of SDG&E’s Application in this proceeding. My qualifications are included in that testimony. *See Prepared Direct Testimony of Neetu Malik on Behalf of San Diego Gas & Electric Company* (September 23, 2019) (“SDG&E Testimony”) at NM-20.

² Note that this rebuttal testimony does not purport to address every argument presented by the Intervenors in their testimony. My choice not to address any particular argument does not indicate agreement with those arguments.

1 Section IV – Seasonally Differentiated Rates Should be Eliminated by Summer of 2020
2 to Provide Relief from High Summer Bills

3 **II. SEASONALLY DIFFERENTIATED RATES CREATE SIGNIFICANT BILL**
4 **VOLATILITY AND CUSTOMER CONFUSION**

5 As noted by the California Public Utilities Commission (“Commission”) in its decision
6 denying SDG&E’s proposal to eliminate the residential High Usage Charge (“HUC”), “[h]igher
7 than expected summer temperatures caused increased electricity usage during the summer of
8 2018, and this increase in usage caused high bill volatility for many of SDG&E’s residential
9 customers in the summer months.”³ The Commission determined that eliminating the seasonal
10 differential in residential rates would address the problem of summer bill volatility more
11 successfully than SDG&E’s proposal to suspend the HUC.⁴ Ordering Paragraph (“OP”) 2 of
12 D.19-04-018 directed SDG&E to seek “to eliminate the seasonal differential in all of its
13 residential rates by the summer of 2020 if in its judgment the summer bill volatility for all its
14 customers warrants the application.” Accordingly, SDG&E filed its Application on September
15 23, 2019.

16 SDG&E’s Application proposes that residential rates have constant pricing throughout
17 the year, regardless of summer or winter months. Elimination of seasonal rate differences is how
18 SDG&E defines “elimination of seasonality.” SDG&E does not consider the continuation of
19 seasonal rate differences for its residential customers as constituting an elimination of
20

³ Decision (“D.”) 19-04-018 at 18, Findings of Fact (“FOF”) 1.

⁴ *Id.* at 19, FOF 13.

1 seasonality, even if the average rate in both seasons is the same.⁵ Doing so would negate the
2 simplicity gained through SDG&E’s proposal.

3 Importantly, the Intervenors generally agree with the elimination of seasonality in SDG&E’s
4 residential rates for purposes of reducing summer bill volatility.⁶ However, the Intervenors point
5 to very small groups of customers for whom there is potentially a more significant impact and
6 propose new rate designs or other protections. These proposals are unnecessary given the
7 overwhelmingly positive population level bill impacts of SDG&E’s proposal, and they are not
8 reasonable for reasons discussed below.

9 **III. INTERVENORS POINT TO SMALL PERCENTAGES OF CUSTOMERS**
10 **IGNORING BENEFITS TO THE VAST MAJORITY**

11 **A. Cal PA Testimony**

12 Cal PA supports SDG&E’s application for the elimination of seasonality in its tiered rates
13 but proposes arbitrary “illustrative” TOU-DR1 rates. SDG&E cannot support the time-of-use
14 (“TOU”) rate proposal provided by Cal PA.

15 Cal PA argues that specific small customer groups could experience adverse bill impacts
16 due to “disproportionate” increases to winter on-peak TOU rates.⁷ The rate changes proposed by

⁵ Compare Public Advocates Office Testimony on the Application of San Diego Gas & Electric Company for Approval of Eliminating Residential Seasonal Rates (December 18, 2019) (incorrectly dated “November 18, 2019”) (“Cal PA Testimony”) at 7 (“SDG&E can still have different TOU prices in each season while the residential class as a whole would see the same average rate in both seasons.”).

⁶ See Cal PA Testimony at 1 (“The Public Advocates Office finds SDG&E’s overall proposal to eliminate seasonal differentials from its residential rates reasonable with a few exceptions . . .”); Opening Testimony of Melissa Kasnitz on Phase I Issues (December 18, 2019) (“CforAT Testimony”) at 1 (“CforAT believes that it may be reasonable for SDG&E to eliminate seasonal differentials in general . . .”); Prepared Testimony of David Cheng Addressing Application of San Diego Gas & Electric Company (U 902 E) for Authority to Eliminate the Seasonal Differential in Its Residential Rates Per Decision 19-04-018 (December 18, 2019) (“TURN Testimony”) at 2.

⁷ Cal PA Testimony at 5.

1 SDG&E, however, do not result in unreasonable bill impacts. Cal PA correctly observes that
2 about 12.26% of coastal, non-CARE customers on schedule TOU-DR1 will see an increase of
3 greater than 5% in average winter bills;⁸ however, Cal PA ignores that although this small
4 percentage may see a greater than 5% increase in winter bills, the entire population of TOU-DR1
5 coastal, non-CARE customers are expected to see an average annual bill decrease of
6 approximately 0.03%.⁹ Importantly, over 75% of TOU-DR1 coastal, non-CARE customers are
7 expected to see a bill decrease of 3.4% or higher in summer, mitigating the winter increase.¹⁰
8 SDG&E designs rates on a class basis for its average residential customer. There are structural
9 benefitters and non-benefitters to each rate proposal, but SDG&E seeks to balance equitable rates
10 for the majority of its customers and believes that providing additional protections to certain
11 subsets of customers will only serve to create a non-transparent cross-subsidy at the expense of
12 those customers without said protections. These protections are unmerited. The bill impacts
13 used to assess SDG&E's proposal indicate that winter bill impacts are reasonable for a
14 substantial majority of TOU-DR1 customers, especially because it is mitigated by the
15 corresponding decrease in the summer bill:

- 16 - 87.67% of coastal, non-CARE basic service TOU-DR1 customers will experience
17 winter bill increases of \$4.84 (3.35%) or less;¹¹
- 18 - 97.92% of coastal, non-CARE, all-electric TOU-DR1 customers will experience
19 winter bill increases of \$5.10 (5.88%) or less;¹²

⁸ *Id.* at 5; see also Attachment A1, SDG&E's Response to Cal PA's Data Request 2 (served on November 15, 2019) at page 5 of 50, lines 7-8.

⁹ Attachment A1 at page 3 of 50, line 15.

¹⁰ *Id.* at page 4 of 50, line 3.

¹¹ *Id.* at page 5 of 50, line 6.

¹² *Id.* at page 8 of 50, line 7.

- 1 - 98.13% of coastal, CARE, basic service TOU-DR1 customers, will experience
2 winter bill increases of \$2.89 (5.83%) or less;¹³ and
3 - 95.27% of coastal, CARE, all-electric customers on TOU-DR1, will experience
4 winter bill increases of \$3.03 (6.02%) or less.¹⁴

5 Further, Cal PA's assertion that this proceeding's bill impact distributions for the TOU-
6 DR1 rate schedule are unrepresentative should be disregarded. SDG&E's TOU-DR1 bill
7 impacts were developed using usage data from a representative default TOU pilot population that
8 was approved as part of SDG&E's default TOU pilot plan in Commission Resolution E-4848.
9 As directed by the Commission, this same usage data is being used to evaluate SDG&E's default
10 TOU efforts and related load impacts.¹⁵ The Commission's previous review and approval of
11 these bill impact distributions for analysis of bill impacts related to the TOU-DR1 rate schedule,
12 the same type of analysis that is being done here, should provide sufficient support for SDG&E's
13 use of those bill impact distributions in the manner they are being used in this proceeding.

14 In its testimony, Cal PA proposes a different TOU-DR1 rate schedule with the intent of
15 reducing the on-peak winter rate. Cal PA's proposal artificially maintains existing on-peak/off-
16 peak ratios for summer and winter, which results in end use customer rates that still vary by
17 season. Cal PA argues that maintaining TOU price differentials between summer and winter
18 rates can still constitute "elimination of seasonality."¹⁶ SDG&E finds that this argument negates
19 one of the primary purposes of SDG&E's Application, which is to address customer confusion
20 around SDG&E's rates. Below, is the comparison between SDG&E and Cal PA's rate proposal:

¹³ *Id.* at page 11 of 50, line 7.

¹⁴ *Id.* at page 14 of 50, line 7.

¹⁵ Resolution E-4848 (May 25, 2017) at OP 7 and Findings 4 and 14.

¹⁶ *See* Cal PA Testimony at 8.

1

Table 1: Comparison of SDG&E's and Cal PA's Illustrative Rates for TOU-DR1

	Effective Rates as of 6/1/19* (\$/kWh)	SDG&E Elimination of Seasonality Proposed Rates (\$/kWh)	Change (%)	Cal PA Elimination of Seasonality Proposed Rates in Testimony (\$/kWh)	Change (%)
Summer Energy					
On-Peak	0.56455	0.46205	-18.2%	0.54049	-4.3%
Off-Peak	0.34524	0.35327	2.3%	0.33053	-4.3%
Super Off-Peak	0.29455	0.32268	9.6%	0.28110	-4.6%
Winter Energy					
On-Peak	0.36998	0.46205	24.9%	0.38408	3.8%
Off-Peak	0.36016	0.35327	-1.9%	0.37388	3.8%
Super Off-Peak	0.34927	0.32268	-7.6%	0.36258	3.8%
Summer Baseline Credit	(0.10404)	(0.09926)	4.6%	(0.09926)	-4.6%
Winter Baseline Credit	(0.09536)	(0.09926)	-4.1%	(0.09926)	4.1%
RAR	0.27368	0.27368	0.0%	0.27368	0.0%

2

*Rates Effective per AL 3377-E

3

4

5

6

7

8

9

10

11

12

13

14

As summarized in Table 1 above, the rates proposed by Cal PA result in the TOU-DR1 summer rates being higher than the TOU-DR1 winter rates which will continue to result in summer bill volatility and customer confusion. Equalizing rates year-round is a simplification that will help customers better understand their rates, giving them a greater ability to manage their bills by shifting their daily usage to off-peak periods. Cal PA fails to explain the need for the continuation of a seasonally differentiated price signal for residential energy consumption. Potentially negative bill impacts for a very small subset of customers, on its own, does not merit a new rate design that artificially holds on-peak to off-peak price ratios constant, while retaining seasonally differentiated prices.

The non-seasonal residential TOU rates that SDG&E proposed in its Application are based on SDG&E's current residential TOU rates at the time of filing, which were developed based on the marginal commodity energy and generation capacity costs adopted in Commission

1 D.17-08-030 in SDG&E's 2016 General Rate Case Phase 2, A.15-04-012. SDG&E is not
2 proposing changes to the TOU marginal commodity costs, periods, or period differentials
3 adopted in D.17-08-030.

4 In order to calculate non-seasonal residential rates, all commodity costs have been
5 grouped into three TOU periods to develop non-seasonal TOU energy rates. The on-peak TOU
6 period has been allocated the summer on-peak generation capacity costs, and all on-peak
7 volumetric energy costs. The off-peak TOU period has been allocated the off-peak generation
8 capacity costs, and all off-peak volumetric energy costs. The super off-peak TOU period has
9 been allocated all super off-peak volumetric energy costs.

10 Although there is an inevitable muting of summer price signals by no longer having
11 seasonally differentiated rates, SDG&E's proposed rate design is still reasonably cost based.
12 Generation capacity costs are still derived and allocated to the on-peak and off-peak periods in
13 the same manner as they currently are, and volumetric energy cost-based rates also follow the
14 same rate design principles as current. Customers will still receive a price signal to shift usage
15 away from the on-peak period, as the commodity differential between on-peak and super-off-
16 peak period has been maintained for SDG&E's residential Mass TOU Default rate (Schedule
17 TOU-DR1) and 2-period optional rate (Schedule TOU-DR2). As evidenced in the bill impacts
18 accompanying my direct testimony, the annual bill impact of removing seasonality is unchanged
19 for nearly all residential customers;¹⁷ this implies that customers are generally not avoiding or
20 shifting away generation costs incurred to serve them. Rather, they are still paying for these
21 costs over the course of a year, but in a more stable manner. Customers can enjoy this rate
22 stability, while still experiencing meaningful and less complicated TOU price signals daily.

¹⁷ See generally SDG&E Testimony at Attachment A and Attachment A1.

1 **B. CforAT Testimony**

2 CforAT’s argument that SDG&E should eliminate seasonality while preserving “TOU-
3 lite” differentials is misplaced and misinterprets relevant Commission decisions. First, CforAT’s
4 assertion that SDG&E’s proposal would “result in substantially larger differentials between the
5 peak rate and the super off-peak rate for default TOU customers” is misleading.¹⁸ SDG&E’s
6 proposal would implement winter rates with a larger on-peak to super off-peak differential than
7 in the current rate structure, but summer rates will have a reduced differential, a fact CforAT
8 conveniently omitted.

9 Second, while CforAT references “TOU-lite” from D.15-07-001, the Commission
10 approved SDG&E’s current TOU-DR1 differentials after that decision was issued. In
11 D.18-12-004, the Commission agreed that SDG&E’s 3-period (on-peak, off-peak, and super off-
12 peak) TOU rate schedule, which has a higher TOU differential between its on-peak and super
13 off-peak rates as compared to a 2-period TOU rate schedule, showed greater load shifting
14 compared to the 2-period rate. The 2-period rate still remains an optional rate for customers, but
15 the default rate is the 3-period rate despite the higher TOU differentials. California has
16 undertaken a statewide marketing, education and outreach campaign to inform customers of the
17 need to shift usage outside the on-peak period. This campaign does not differentiate between
18 summer and winter months. Therefore, if a customer is consistently shifting usage outside the
19 on-peak period throughout the year, under SDG&E’s seasonality proposal, the customer could
20 stand to see even greater bill savings and less volatility.

21 CforAT also argues that “the materials provided by SDG&E in conjunction with the
22 Application show that the proposed changes risk creating unreasonable bill impacts for certain

¹⁸ CforAT Testimony at 1.

1 customers.”¹⁹ Other than all-electric customers, CforAT does not specify which customer
2 groups, if any, it is concerned about.²⁰ With respect to all-electric customers, SDG&E believes
3 the bill impacts to this customer segment are reasonable.²¹ Because this rate making Application
4 is revenue neutral, there will be some customers that experience slightly higher bills, while
5 others see lower bills. SDG&E considers the impacts to all customers when developing rate
6 proposal. As discussed earlier in this rebuttal testimony:

- 7 - 97.92% of coastal, non-CARE, all-electric TOU-DR1 customers will experience
8 winter bill increases of \$5.10 (5.88%) or less;²² and
- 9 - 95.27% of coastal, CARE, all-electric customers on TOU-DR1, will experience
10 winter bill increases of \$3.03 (6.02%) or less.²³

11 These bill impacts do not support CforAT’s claim that the proposal, and associated
12 impacts, are unreasonable.

13 **C. TURN Testimony**

14 TURN, while supporting the elimination of seasonality, suggests either one-year
15 protection against disconnections, or to “exclude all-electric customers or allow them to opt-out
16 of the change.”²⁴ While SDG&E appreciates TURN’s suggestion, this Application is not the
17 appropriate vehicle to address protections against electric disconnections, especially given the
18 mild bill impacts from SDG&E’s proposal, as discussed above. The topic of disconnections is
19 currently being addressed in a separate Order Instituting Rulemaking 18-07-005 to consider new

¹⁹ CforAT testimony at p. 5.

²⁰ *See id.* at 6.

²¹ *See, e.g.*, SDG&E Testimony at Attachment A, Schedule TOU-DR1, Run 2 pages 6, 12, 18, 24, 30, 36, 42, 48, of 50.

²² Attachment A1 at page 8 of 50, line 7.

²³ *Id.* at page 14 of 50, line 7.

²⁴ TURN Testimony at 2.

1 approaches to disconnections and reconnections to improve energy access and contain costs. In
2 fact, D.18-12-013 dated December 13, 2018 adopted several interim rules intended to provide
3 “rapid relief” while the Commission considers longer term solutions to reduce the number of
4 residential customer disconnections and to improve the reconnection processes for
5 disconnected customers.²⁵

6 TURN’s alternative suggestion for providing an opt out option for all-electric customers
7 would require SDG&E to essentially double the number of residential rate schedules and tariffs
8 that it offers to customers—one with seasonal rates and one with seasonal rates eliminated.

9 Because the seasonal differential is maintained within the summer and winter commodity rates, it
10 is not feasible to remove seasonality with a line item on the bill, rather it requires an entire
11 additional set of rate schedules. SDG&E believes such an opt-out option will create significant
12 customer confusion and require additional customer education.

13 Furthermore, the creation of a second set of rates would create significant operational
14 costs that SDG&E does not believe are in the interests of its customers and in the near term,
15 billing system constraints and requirements make the implementation of these duplicated rate
16 options impossible. SDG&E is currently in the 2020 “freeze period” of its Customer
17 Relationship and Billing (“CR&B”) system replacement project, where it cannot make structural
18 adjustments to its tariffed rates. Even when the new CR&B system is implemented and
19 stabilized in 2021 it would be costly and complex to determine how to implement and administer
20 34 rate schedules as opposed to the 17 rate schedules.²⁶

²⁵ D.18-12-013 at 2.

²⁶ SDG&E’s current residential schedules are as follows: DR, DM, DS, DT, DT-RV, TOU-DR1, TOU-DR2, TOU-DR, DR-TOU, DR-SES, EV-TOU, EV-TOU-2, EV-TOU-5, and Grandfathered TOU schedules DR-SES (GF), EV-TOU (GF), EV-TOU-2 (GF) and TOU-DR (GF).

1 **IV. SEASONALLY DIFFERENTIATED RATES SHOULD BE ELIMINATED BY**
2 **SUMMER OF 2020 TO PROVIDE RELIEF FROM HIGH SUMMER BILLS**

3 SDG&E is seeking a streamlined and consolidated timeline for implementation of the
4 relief sought in this Application. As previously stated, most of SDG&E's residential customers
5 will see annual bill decreases as a result of eliminating seasonality, and, if implemented by
6 June 1, 2020, will on average see lower summer bills than they would without elimination of
7 seasonality. Keep in mind that even if SDG&E's proposal is adopted, average summer bills for
8 residential customers will still be higher than average winter bills due to higher energy
9 consumption during summer months. Given that this proposal will provide immediate and
10 substantial relief to almost all SDG&E residential customers' summer bills, and that the annual
11 impacts will, for most, result in annual savings, SDG&E does not agree with CforAT's
12 suggestion that there is a need to delay the implementation of non-seasonally differentiated
13 rates.²⁷ Customers deserve relief as soon as possible. Eliminating seasonality will reduce annual
14 bills for most customers, and any negative impacts from the change are limited.

15 This concludes my prepared rebuttal testimony.

²⁷ CforAT Testimony at 3-4.

Attachment A1

Fuller, William

From: Fuller, William
Sent: Thursday, November 14, 2019 5:01 PM
To: 'Tan, Lee-Whei'
Cc: Chau, Nathan; Obiora, Noel; Hansson, Rebecca; Malik, Neetu; Siebuhr, Alan
Subject: SDG&E Response to CalPA DR02 - Seasonality Application (A.19-09)
Attachments: CalPA-DR-02_SDGE Response.docx; Cal PA DR 02_Bill Impact Reformatted Q3.xlsx

Hi Lee-Whei,

Attached, please find SDG&E's response to CalPA DR02 in SDG&E's Seasonality Application, A.19-09-014. If you have any questions, please let me know.

Thanks,

Will Fuller

California & Federal Regulatory Affairs
San Diego Gas & Electric Company
8330 Century Park Court, CP32F
San Diego, CA 92123-1548
(858) 654-1885

CalPA-DR-02_SDGE Response.docx

PUBLIC ADVOCATES OFFICE DATA REQUEST
CALPA-SDGE-DR-02
ELIMINATION OF RESIDENTIAL SEASONALITY – A.19-09-014
SDG&E RESPONSE
DATE RECEIVED: NOVEMBER 7, 2019
DATE RESPONDED: NOVEMBER 14, 2019

1. SDG&E proposed to eliminate seasonal rate differential for all TOU periods between summer and winter. Please
 - a. Provide support to show how SDG&E's proposed new TOU rates continue to generally follow SDG&E's marginal costs which vary by season and TOU periods.

SDG&E Response:

The non-seasonal residential TOU rates that SDG&E proposed in this application are based on SDG&E's current residential TOU rates,¹ which were developed based on the marginal commodity energy and generation capacity costs adopted in California Public Utilities Commission Decision (D.) 17-08-030 in SDG&E's 2016 General Rate Case Phase 2, A.15-04-012. SDG&E is not proposing changes to the TOU marginal commodity costs, periods, or period differentials adopted in D.17-08-030.

In order to calculate non-seasonal residential rates, all commodity costs have been grouped into three TOU periods to develop non-seasonal TOU energy rates. The on-peak TOU period has been allocated the summer on-peak generation capacity costs, and all on-peak volumetric energy costs. The off-peak TOU period has been allocated the off-peak generation capacity costs, and all off-peak volumetric energy costs. The super off-peak TOU period has been allocated all super off-peak volumetric energy costs.

Although there is an inevitable muting of summer price signals by no longer having seasonally differentiated rates, SDG&E's proposed rate design is still reasonably cost based. Generation capacity costs are still derived and allocated to the on-peak and off-peak periods in the same manner as they currently are, and volumetric energy cost-based rates also follow the same rate design principles as current. Customers will still receive a price signal to shift usage away from the on-peak period, as the commodity differential between on- and super-off-peak period has been maintained for SDG&E's residential Mass TOU Default rate (Schedule TOU-DR1) and 2-period optional rate (Schedule TOU-DR2). As evidenced in the Attachment A bill impacts accompanying the direct testimony of Neetu Malik, the bill impact of removing seasonality is minimal for nearly all residential customers; this implies that customers are generally not avoiding or shifting away generation costs incurred to serve them. Rather, they are still paying for these costs over the course of a year, but in a more stable manner. Customers can enjoy this rate stability, while still experiencing meaningful and less complicated TOU price signals daily.

¹ Electric rates effective June 1, 2019, per SDG&E Advice Letter 3377-E approved by Energy Division letter on June 21, 2019.

PUBLIC ADVOCATES OFFICE DATA REQUEST
CALPA-SDGE-DR-02
ELIMINATION OF RESIDENTIAL SEASONALITY – A.19-09-014
SDG&E RESPONSE
DATE RECEIVED: NOVEMBER 7, 2019
DATE RESPONDED: NOVEMBER 14, 2019

2. SDG&E included bill impact tables in the attachments of its testimony for TOUDR1 rates. Please explain how the bill impacts by usage buckets were derived.
 - a. Please confirm the following information that was communicated during a phone conversation between the Public Advocates Office and SDG&E that took place on November 7, 2019 at 1:00 PM,
 1. SDG&E used billing data from customers available between March 2018 and March 2019 to develop its bill impact tables for TOU-DR-1.
 2. SDG&E's bill impact tables for TOU DR-1 do not include customers enrolling after March 2019.

SDG&E Response:

SDG&E's Seasonality Application includes nine bill impact analyses. These analyses include impacts for DR1, TOU-DR1, TOU-DR2, DR-SES, DR-TOU, DR-TOD, DR-TOD-SH, EV-TOU, and EV-TOU5. The bill impacts are calculated using a full year of historic usage, and applying current rates, and then proposed rates. The historic period of usage is from 3/29/2018-3/29/2019.

To calculate the bill impact of a proposed rate, SDG&E uses the historic usage and then calculate two bills, one using current rates and one with proposed rates. The delta between the two calculated bills is the estimated impact of the rate proposal. The provided bill impacts for TOU-DR-1 only include customers that were enrolled on the TOU DR-1 rate as of 3/1/2019 and had 12 continuous months of interval data available at their corresponding Service Point location.

It is very important to note that this historic interval usage is the actual usage of the customer over the 12 month time period, hence if the customer only moved on to a TOU-DR-1 rate in Jan 2019, their usage pattern would include usage when they were on their old Rate along with the remaining usage (which may have shifted because of time of use price signals) on the TOU-DR-1 rate.

PUBLIC ADVOCATES OFFICE DATA REQUEST
CALPA-SDGE-DR-02
ELIMINATION OF RESIDENTIAL SEASONALITY – A.19-09-014
SDG&E RESPONSE
DATE RECEIVED: NOVEMBER 7, 2019
DATE RESPONDED: NOVEMBER 14, 2019

3. Please provide bill impacts for TOU-DR 1 using the format provided below such that the bill impact distribution is summarized by % impact and not by usage bins. Please provide the bill impacts assuming all customers eligible for default TOU rates are on TOU DR1. For those eligible for default TOU rates but are not currently on TOUDR1, please use their interval billing data to calculate their bills under the current TOU DR 1 rate assuming no change in usage. Then, use the same billing determinants for such customers to compute SDG&E's proposed neutralized TOU DR 1 rate.

SDG&E Response:

SDG&E has revised the presentation of the TOU-DR1 rate in the format requested for the bill impacts that were served as an attachment to the testimony. Please refer to the file titled "Cal PA DR 02_Bill Impact Reformatted Q3.xlsx."

In order to calculate the bills for all customers who are eligible for default TOU rates but are not currently on TOU DR-1, using their interval billing data (which represents the usage on a Tiered rate and does not reflect any behavior shift due to the time of use price signals), SDG&E will need approximately 3-4 weeks to produce this population bill impact analysis as this would require a complete re-run of bill impacts in an updated database. In addition to the issue of timing, SDG&E has concerns with the usefulness of modeling TOU DR-1 bill impacts in the manner requested. Our standard bill impact methodology applies proposed rate designs against "static" customer-specific interval data captured in a pre-defined 12-month period. There is no change in usage, regardless of what rate design is modeled.

Until recently, the tiered DR rate had the largest enrollment of customers in SDG&E's residential portfolio. Tiered rates incentivize a reduction in overall monthly consumption habits, ignoring the time-of-use aspect. Time-of-Use rates incentivize shifting consumption habits based on the time of day and day of the week. Therefore, the analysis requested in Question 3 (modeling these customer's bill impacts on a TOU rate) would not capture the price incentive-driven change in consumption behavior.

Since customers would require some time to alter their consumption habits once enrolled in the TOU DR-1 rate, a more practical approach would be to analyze a sample subset of customers that have been enrolled on the TOU DR-1 rate for a 12-month period and were previously enrolled on the DR rate for a 12-month period of time. This analysis would capture the expected shift in customer consumption habits and provide a more accurate assessment of the true expected percentage change impact these customers would encounter. However, because TOU DR-1 rates default only started in March 2019, a full 12-month period will not be available for the default customers until March 2020.

SDG&E anticipates that when customers move from a tiered DR Rate to TOU-DR-1 rate, using the same usage pattern (i.e with no usage shift due to the time of use price signal) will result in

**PUBLIC ADVOCATES OFFICE DATA REQUEST
CALPA-SDGE-DR-02
ELIMINATION OF RESIDENTIAL SEASONALITY – A.19-09-014
SDG&E RESPONSE
DATE RECEIVED: NOVEMBER 7, 2019
DATE RESPONDED: NOVEMBER 14, 2019**

bills with no statistically significant difference. SDG&E notes that seasonality proposal bill impacts for DR customers are already provided in Attachment A.

Cal PA DR 02_Bill Impact Reformatted Q3.xlsx

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
All Customers
Non-CARE, Annual

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	80	0.06%	0.06%	324	\$107.14	\$101.17	-\$5.97	-5.57%	2
3	-5% to -2%	6,682	4.71%	4.77%	558	\$182.76	\$177.97	-\$4.79	-2.62%	3
4	-2% to 0%	58,231	41.05%	45.82%	579	\$184.22	\$182.84	-\$1.37	-0.74%	4
5	0% to 2%	73,610	51.90%	97.72%	448	\$135.36	\$136.21	\$0.85	0.63%	5
6	2% to 5%	3,194	2.25%	99.97%	332	\$96.07	\$98.49	\$2.42	2.52%	6
7	5% to 7.5%	42	0.03%	100.00%	237	\$67.88	\$71.83	\$3.95	5.82%	7
8	7.5% to 10%	6	0.00%	100.00%	192	\$53.25	\$57.71	\$4.47	8.39%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	141,845	100.00%	100.00%	504	\$156.73	\$156.43	-\$0.30	-0.19%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
All Customers
CARE, Annual

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	10	0.03%	0.03%	254	\$51.42	\$48.66	-\$2.77	-5.39%	2
3	-5% to -2%	1,183	3.98%	4.01%	404	\$79.39	\$77.24	-\$2.15	-2.71%	3
4	-2% to 0%	11,334	38.12%	42.13%	423	\$79.81	\$79.28	-\$0.53	-0.66%	4
5	0% to 2%	16,382	55.09%	97.22%	375	\$68.87	\$69.31	\$0.44	0.64%	5
6	2% to 5%	812	2.73%	99.95%	289	\$51.56	\$52.89	\$1.33	2.58%	6
7	5% to 7.5%	13	0.04%	99.99%	191	\$33.36	\$35.17	\$1.80	5.40%	7
8	7.5% to 10%	2	0.01%	100.00%	190	\$32.50	\$35.21	\$2.71	8.34%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	29,736	100.00%	100.00%	392	\$72.96	\$72.95	-\$0.01	-0.01%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
Non-CARE, Annual, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	31	0.04%	0.04%	312	\$104.56	\$98.90	-\$5.66	-5.41%	2
3	-5% to -2%	2,239	3.08%	3.12%	545	\$180.48	\$175.78	-\$4.70	-2.60%	3
4	-2% to 0%	26,461	36.38%	39.50%	578	\$185.90	\$184.62	-\$1.28	-0.69%	4
5	0% to 2%	42,278	58.12%	97.62%	448	\$136.26	\$137.13	\$0.87	0.64%	5
6	2% to 5%	1,717	2.36%	99.98%	331	\$96.46	\$98.85	\$2.39	2.48%	6
7	5% to 7.5%	16	0.02%	100.00%	179	\$51.06	\$54.10	\$3.05	5.97%	7
8	7.5% to 10%	2	0.00%	100.00%	210	\$58.70	\$63.64	\$4.94	8.42%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	72,744	100.00%	100.00%	495	\$154.71	\$154.66	-\$0.05	-0.03%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
Non-CARE, Summer, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	26	0.04%	0.04%	402	\$148.95	\$133.11	-\$15.84	-10.63%	1
2	-10% to -5%	7,566	10.40%	10.44%	674	\$240.05	\$225.82	-\$14.23	-5.93%	2
3	-5% to -2%	47,188	64.87%	75.31%	586	\$193.12	\$186.56	-\$6.57	-3.40%	3
4	-2% to 0%	14,815	20.37%	95.67%	396	\$120.35	\$118.74	-\$1.60	-1.33%	4
5	0% to 2%	2,315	3.18%	98.85%	385	\$112.07	\$112.93	\$0.86	0.77%	5
6	2% to 5%	793	1.09%	99.94%	289	\$79.29	\$81.53	\$2.25	2.84%	6
7	5% to 7.5%	35	0.05%	99.99%	313	\$79.15	\$83.60	\$4.46	5.64%	7
8	7.5% to 10%	3	0.00%	100.00%	98	\$22.29	\$24.12	\$1.83	8.21%	8
9	10% to 15%	3	0.00%	100.00%	287	\$60.10	\$67.66	\$7.56	12.58%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	72,744	100.00%	100.00%	546	\$179.28	\$173.26	-\$6.02	-3.36%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
Non-CARE, Winter, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	27	0.04%	0.04%	345	\$96.73	\$91.35	-\$5.39	-5.57%	2
3	-5% to -2%	354	0.49%	0.52%	442	\$131.17	\$127.55	-\$3.62	-2.76%	3
4	-2% to 0%	2,665	3.66%	4.19%	351	\$105.32	\$104.58	-\$0.74	-0.70%	4
5	0% to 2%	16,117	22.16%	26.34%	431	\$128.74	\$130.40	\$1.66	1.29%	5
6	2% to 5%	44,612	61.33%	87.67%	482	\$144.56	\$149.39	\$4.84	3.35%	6
7	5% to 7.5%	8,159	11.22%	98.89%	432	\$127.44	\$134.82	\$7.38	5.79%	7
8	7.5% to 10%	753	1.04%	99.92%	363	\$105.15	\$113.81	\$8.66	8.24%	8
9	10% to 15%	57	0.08%	100.00%	281	\$79.87	\$88.71	\$8.84	11.07%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	72,744	100.00%	100.00%	459	\$137.15	\$141.37	\$4.21	3.07%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
Non-CARE, Annual, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	3	0.02%	0.02%	220	\$65.65	\$61.71	-\$3.94	-6.00%	2
3	-5% to -2%	405	2.47%	2.49%	375	\$117.71	\$114.71	-\$3.00	-2.55%	3
4	-2% to 0%	6,811	41.53%	44.02%	420	\$128.28	\$127.42	-\$0.86	-0.67%	4
5	0% to 2%	8,476	51.69%	95.71%	367	\$108.47	\$109.18	\$0.71	0.66%	5
6	2% to 5%	694	4.23%	99.94%	287	\$81.83	\$84.00	\$2.17	2.65%	6
7	5% to 7.5%	7	0.04%	99.98%	288	\$83.00	\$87.79	\$4.79	5.77%	7
8	7.5% to 10%	3	0.02%	100.00%	174	\$48.43	\$52.41	\$3.99	8.24%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	16,399	100.00%	100.00%	385	\$115.77	\$115.80	\$0.03	0.03%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
Non-CARE, Summer, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	8	0.05%	0.05%	280	\$102.28	\$91.23	-\$11.05	-10.80%	1
2	-10% to -5%	1,553	9.47%	9.52%	411	\$140.70	\$132.38	-\$8.32	-5.91%	2
3	-5% to -2%	9,710	59.21%	68.73%	463	\$151.10	\$146.14	-\$4.96	-3.28%	3
4	-2% to 0%	4,274	26.06%	94.79%	319	\$94.89	\$93.64	-\$1.25	-1.32%	4
5	0% to 2%	716	4.37%	99.16%	316	\$90.38	\$91.00	\$0.62	0.69%	5
6	2% to 5%	126	0.77%	99.93%	303	\$82.12	\$84.47	\$2.35	2.86%	6
7	5% to 7.5%	12	0.07%	100.00%	233	\$57.95	\$61.18	\$3.23	5.57%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	16,399	100.00%	100.00%	412	\$132.19	\$128.18	-\$4.01	-3.03%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
Non-CARE, Winter, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	8	0.05%	0.05%	241	\$63.30	\$59.57	-\$3.73	-5.89%	2
3	-5% to -2%	170	1.04%	1.09%	284	\$76.01	\$73.82	-\$2.19	-2.88%	3
4	-2% to 0%	901	5.49%	6.58%	330	\$92.42	\$91.74	-\$0.68	-0.74%	4
5	0% to 2%	4,547	27.73%	34.31%	361	\$102.85	\$104.09	\$1.24	1.21%	5
6	2% to 5%	8,464	51.61%	85.92%	391	\$111.84	\$115.51	\$3.68	3.29%	6
7	5% to 7.5%	1,968	12.00%	97.92%	312	\$86.78	\$91.88	\$5.10	5.88%	7
8	7.5% to 10%	303	1.85%	99.77%	261	\$71.51	\$77.44	\$5.93	8.29%	8
9	10% to 15%	36	0.22%	99.99%	265	\$74.04	\$81.98	\$7.93	10.71%	9
10	15% to 17.5%	2	0.01%	100.00%	181	\$48.95	\$57.14	\$8.18	16.71%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	16,399	100.00%	100.00%	366	\$104.04	\$106.96	\$2.92	2.81%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
CARE, Annual, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	1	0.01%	0.01%	319	\$66.04	\$62.54	-\$3.50	-5.30%	2
3	-5% to -2%	228	1.98%	1.99%	368	\$71.69	\$69.84	-\$1.85	-2.58%	3
4	-2% to 0%	3,801	33.02%	35.01%	399	\$75.19	\$74.76	-\$0.43	-0.57%	4
5	0% to 2%	7,161	62.21%	97.21%	355	\$65.37	\$65.78	\$0.41	0.63%	5
6	2% to 5%	316	2.75%	99.96%	271	\$48.18	\$49.42	\$1.24	2.57%	6
7	5% to 7.5%	5	0.04%	100.00%	190	\$32.82	\$34.51	\$1.69	5.15%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	11,512	100.00%	100.00%	368	\$68.25	\$68.36	\$0.11	0.16%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
CARE, Summer, Basic

Line	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	Line
1	<-10%	4	0.04%	0.04%	298	\$65.29	\$58.53	-\$6.76	-10.35%	1
2	-10% to -5%	1,134	9.85%	9.89%	376	\$78.08	\$73.43	-\$4.65	-5.96%	2
3	-5% to -2%	7,602	66.04%	75.92%	417	\$81.67	\$79.03	-\$2.65	-3.25%	3
4	-2% to 0%	2,402	20.87%	96.79%	351	\$64.09	\$63.23	-\$0.86	-1.34%	4
5	0% to 2%	297	2.58%	99.37%	339	\$59.61	\$60.08	\$0.46	0.77%	5
6	2% to 5%	67	0.58%	99.95%	308	\$51.07	\$52.54	\$1.47	2.88%	6
7	5% to 7.5%	4	0.04%	99.98%	432	\$73.33	\$77.24	\$3.91	5.33%	7
8	7.5% to 10%	1	0.01%	99.99%	348	\$48.08	\$52.46	\$4.38	9.11%	8
9	10% to 15%	1	0.01%	100.00%	112	\$15.04	\$16.66	\$1.62	10.77%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	11,512	100.00%	100.00%	397	\$76.89	\$74.52	-\$2.36	-3.07%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
CARE, Winter, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	3	0.03%	0.03%	305	\$51.29	\$48.59	-\$2.71	-5.28%	2
3	-5% to -2%	75	0.65%	0.68%	315	\$55.14	\$53.58	-\$1.56	-2.83%	3
4	-2% to 0%	430	3.74%	4.41%	364	\$65.82	\$65.31	-\$0.51	-0.78%	4
5	0% to 2%	2,360	20.50%	24.91%	371	\$66.90	\$67.73	\$0.83	1.24%	5
6	2% to 5%	6,750	58.63%	83.55%	357	\$63.98	\$66.11	\$2.13	3.33%	6
7	5% to 7.5%	1,679	14.59%	98.13%	284	\$49.57	\$52.46	\$2.89	5.83%	7
8	7.5% to 10%	192	1.67%	99.80%	248	\$43.05	\$46.65	\$3.60	8.36%	8
9	10% to 15%	23	0.20%	100.00%	226	\$38.46	\$42.72	\$4.26	11.08%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	11,512	100.00%	100.00%	347	\$62.09	\$63.97	\$1.88	3.03%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
CARE, Annual, All-Electric

Line	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	Line
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	73	1.84%	1.84%	342	\$64.62	\$62.97	-\$1.65	-2.55%	3
4	-2% to 0%	1,460	36.71%	38.55%	360	\$66.42	\$66.00	-\$0.42	-0.63%	4
5	0% to 2%	2,242	56.37%	94.92%	325	\$58.91	\$59.33	\$0.42	0.71%	5
6	2% to 5%	196	4.93%	99.85%	272	\$48.68	\$49.93	\$1.25	2.57%	6
7	5% to 7.5%	4	0.10%	99.95%	137	\$23.33	\$24.54	\$1.21	5.19%	7
8	7.5% to 10%	2	0.05%	100.00%	190	\$32.50	\$35.21	\$2.71	8.34%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	3,977	100.00%	100.00%	335	\$61.22	\$61.33	\$0.11	0.18%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
CARE, Summer, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	4	0.10%	0.10%	166	\$34.77	\$31.15	-\$3.63	-10.44%	1
2	-10% to -5%	648	16.29%	16.40%	325	\$67.19	\$63.09	-\$4.10	-6.10%	2
3	-5% to -2%	2,208	55.52%	71.91%	372	\$73.76	\$71.32	-\$2.43	-3.29%	3
4	-2% to 0%	897	22.56%	94.47%	323	\$59.99	\$59.20	-\$0.79	-1.32%	4
5	0% to 2%	176	4.43%	98.89%	303	\$53.76	\$54.16	\$0.40	0.74%	5
6	2% to 5%	44	1.11%	100.00%	313	\$54.05	\$55.59	\$1.53	2.83%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	3,977	100.00%	100.00%	350	\$68.44	\$66.27	-\$2.17	-3.17%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Coastal Customers
CARE, Winter, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	4	0.10%	0.10%	247	\$40.59	\$38.27	-\$2.33	-5.74%	2
3	-5% to -2%	49	1.23%	1.33%	346	\$60.21	\$58.58	-\$1.64	-2.72%	3
4	-2% to 0%	234	5.88%	7.22%	347	\$60.21	\$59.74	-\$0.46	-0.76%	4
5	0% to 2%	890	22.38%	29.60%	352	\$61.34	\$62.07	\$0.73	1.19%	5
6	2% to 5%	1,902	47.83%	77.42%	327	\$56.44	\$58.34	\$1.91	3.38%	6
7	5% to 7.5%	710	17.85%	95.27%	294	\$50.37	\$53.40	\$3.03	6.02%	7
8	7.5% to 10%	155	3.90%	99.17%	254	\$43.14	\$46.75	\$3.61	8.37%	8
9	10% to 15%	33	0.83%	100.00%	243	\$41.59	\$46.15	\$4.56	10.96%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	3,977	100.00%	100.00%	325	\$56.06	\$57.81	\$1.74	3.10%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
Non-CARE, Annual, Basic

Line	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	Line
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	2	18.18%	18.18%	482	\$143.59	\$139.96	-\$3.64	-2.54%	3
4	-2% to 0%	4	36.36%	54.55%	610	\$185.89	\$184.78	-\$1.11	-0.60%	4
5	0% to 2%	3	27.27%	81.82%	419	\$119.82	\$121.70	\$1.88	1.57%	5
6	2% to 5%	2	18.18%	100.00%	229	\$63.73	\$65.38	\$1.65	2.59%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	11	100.00%	100.00%	465	\$137.97	\$137.72	-\$0.25	-0.18%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
Non-CARE, Summer, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	1	9.09%	9.09%	129	\$38.47	\$36.38	-\$2.09	-5.43%	2
3	-5% to -2%	6	54.55%	63.64%	682	\$215.06	\$207.75	-\$7.31	-3.40%	3
4	-2% to 0%	3	27.27%	90.91%	361	\$102.27	\$100.90	-\$1.37	-1.34%	4
5	0% to 2%	1	9.09%	100.00%	694	\$187.63	\$188.93	\$1.30	0.69%	5
6	2% to 5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	11	100.00%	100.00%	545	\$165.75	\$161.32	-\$4.43	-2.67%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
Non-CARE, Winter, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	1	9.09%	9.09%	567	\$162.19	\$158.15	-\$4.04	-2.49%	3
4	-2% to 0%	2	18.18%	27.27%	311	\$87.41	\$86.16	-\$1.25	-1.43%	4
5	0% to 2%	1	9.09%	36.36%	96	\$25.23	\$25.23	\$0.01	0.04%	5
6	2% to 5%	5	45.46%	81.82%	545	\$161.35	\$167.01	\$5.65	3.50%	6
7	5% to 7.5%	2	18.18%	100.00%	241	\$65.19	\$69.36	\$4.17	6.40%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	11	100.00%	100.00%	408	\$118.12	\$120.86	\$2.73	2.31%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
Non-CARE, Annual, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	2	15.39%	15.39%	591	\$182.46	\$177.53	-\$4.94	-2.71%	3
4	-2% to 0%	8	61.54%	76.92%	818	\$257.55	\$254.67	-\$2.88	-1.12%	4
5	0% to 2%	3	23.08%	100.00%	889	\$280.41	\$281.83	\$1.42	0.51%	5
6	2% to 5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	13	100.00%	100.00%	799	\$251.27	\$249.07	-\$2.21	-0.88%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
Non-CARE, Summer, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	4	30.77%	30.77%	1,107	\$386.49	\$362.03	-\$24.47	-6.33%	2
3	-5% to -2%	6	46.15%	76.92%	917	\$301.63	\$289.71	-\$11.92	-3.95%	3
4	-2% to 0%	1	7.69%	84.62%	202	\$55.35	\$54.33	-\$1.02	-1.84%	4
5	0% to 2%	2	15.39%	100.00%	1,396	\$450.90	\$451.03	\$0.13	0.03%	5
6	2% to 5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	13	100.00%	100.00%	994	\$331.76	\$318.67	-\$13.09	-3.95%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
Non-CARE, Winter, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	3
4	-2% to 0%	2	15.39%	15.39%	1,051	\$331.19	\$325.66	-\$5.53	-1.67%	4
5	0% to 2%	3	23.08%	38.46%	237	\$62.59	\$63.61	\$1.02	1.63%	5
6	2% to 5%	6	46.15%	84.62%	663	\$188.73	\$194.98	\$6.25	3.31%	6
7	5% to 7.5%	1	7.69%	92.31%	1,257	\$388.23	\$417.28	\$29.05	7.48%	7
8	7.5% to 10%	1	7.69%	100.00%	541	\$148.40	\$162.22	\$13.82	9.31%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	13	100.00%	100.00%	661	\$193.78	\$199.35	\$5.57	2.87%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
CARE, Annual, Basic

Line	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	Line
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	1	33.33%	33.33%	241	\$44.99	\$43.47	-\$1.52	-3.38%	3
4	-2% to 0%	1	33.33%	66.67%	228	\$38.95	\$38.73	-\$0.23	-0.59%	4
5	0% to 2%	1	33.33%	100.00%	1,333	\$275.81	\$275.86	\$0.05	0.02%	5
6	2% to 5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	3	100.00%	100.00%	600	\$119.92	\$119.35	-\$0.56	-0.47%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
CARE, Summer, Basic

Line	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	Line
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	1	33.33%	33.33%	426	\$82.56	\$77.60	-\$4.96	-6.01%	2
3	-5% to -2%	1	33.33%	66.67%	1,223	\$249.06	\$243.93	-\$5.12	-2.06%	3
4	-2% to 0%	1	33.33%	100.00%	218	\$37.07	\$36.57	-\$0.49	-1.32%	4
5	0% to 2%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	5
6	2% to 5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	3	100.00%	100.00%	622	\$122.89	\$119.37	-\$3.53	-2.87%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
CARE, Winter, Basic

Line	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	Line
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	3
4	-2% to 0%	1	33.33%	33.33%	236	\$40.30	\$40.27	-\$0.03	-0.07%	4
5	0% to 2%	1	33.33%	66.67%	1,412	\$294.91	\$298.66	\$3.75	1.27%	5
6	2% to 5%	0	0.00%	66.67%	0	\$0.00	\$0.00	\$0.00	0.00%	6
7	5% to 7.5%	1	33.33%	100.00%	109	\$18.15	\$19.10	\$0.94	5.18%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	3	100.00%	100.00%	585	\$117.79	\$119.34	\$1.55	1.32%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
CARE, Annual, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	2	25.00%	25.00%	684	\$132.78	\$128.84	-\$3.95	-2.98%	3
4	-2% to 0%	4	50.00%	75.00%	783	\$148.92	\$147.23	-\$1.69	-1.14%	4
5	0% to 2%	1	12.50%	87.50%	642	\$115.57	\$115.70	\$0.13	0.11%	5
6	2% to 5%	1	12.50%	100.00%	159	\$21.67	\$22.17	\$0.51	2.35%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	8	100.00%	100.00%	663	\$124.81	\$123.06	-\$1.75	-1.40%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
CARE, Summer, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	3	37.50%	37.50%	622	\$126.34	\$118.22	-\$8.13	-6.44%	2
3	-5% to -2%	4	50.00%	87.50%	1,070	\$219.44	\$210.90	-\$8.54	-3.89%	3
4	-2% to 0%	0	0.00%	87.50%	0	\$0.00	\$0.00	\$0.00	0.00%	4
5	0% to 2%	0	0.00%	87.50%	0	\$0.00	\$0.00	\$0.00	0.00%	5
6	2% to 5%	0	0.00%	87.50%	0	\$0.00	\$0.00	\$0.00	0.00%	6
7	5% to 7.5%	0	0.00%	87.50%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	87.50%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	87.50%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	87.50%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	1	12.50%	100.00%	210	\$24.65	\$29.23	\$4.58	18.58%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	8	100.00%	100.00%	795	\$160.18	\$153.43	-\$6.74	-4.21%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Desert Customers
CARE, Winter, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	1	12.50%	12.50%	122	\$19.54	\$17.13	-\$2.41	-12.33%	1
2	-10% to -5%	0	0.00%	12.50%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	0	0.00%	12.50%	0	\$0.00	\$0.00	\$0.00	0.00%	3
4	-2% to 0%	0	0.00%	12.50%	0	\$0.00	\$0.00	\$0.00	0.00%	4
5	0% to 2%	3	37.50%	50.00%	807	\$145.04	\$147.07	\$2.04	1.41%	5
6	2% to 5%	4	50.00%	100.00%	501	\$85.43	\$88.14	\$2.71	3.17%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	8	100.00%	100.00%	568	\$99.54	\$101.36	\$1.82	1.83%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
Non-CARE, Annual, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	37	0.09%	0.09%	342	\$113.72	\$107.18	-\$6.55	-5.76%	2
3	-5% to -2%	3,306	7.81%	7.89%	595	\$195.60	\$190.43	-\$5.18	-2.65%	3
4	-2% to 0%	19,724	46.57%	54.46%	625	\$199.46	\$197.82	-\$1.65	-0.83%	4
5	0% to 2%	18,723	44.20%	98.66%	467	\$140.19	\$141.02	\$0.83	0.59%	5
6	2% to 5%	558	1.32%	99.98%	371	\$107.76	\$110.43	\$2.66	2.47%	6
7	5% to 7.5%	10	0.02%	100.00%	283	\$82.47	\$87.11	\$4.64	5.63%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	42,358	100.00%	100.00%	549	\$171.65	\$170.88	-\$0.77	-0.45%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
Non-CARE, Summer, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	30	0.07%	0.07%	423	\$156.40	\$139.12	-\$17.28	-11.05%	1
2	-10% to -5%	7,447	17.58%	17.65%	747	\$264.50	\$248.45	-\$16.05	-6.07%	2
3	-5% to -2%	25,725	60.73%	78.38%	662	\$217.11	\$209.58	-\$7.53	-3.47%	3
4	-2% to 0%	7,378	17.42%	95.80%	461	\$138.99	\$137.18	-\$1.82	-1.31%	4
5	0% to 2%	1,251	2.95%	98.76%	436	\$125.91	\$126.85	\$0.94	0.75%	5
6	2% to 5%	510	1.20%	99.96%	270	\$72.01	\$74.03	\$2.02	2.81%	6
7	5% to 7.5%	14	0.03%	99.99%	427	\$109.05	\$116.22	\$7.17	6.58%	7
8	7.5% to 10%	1	0.00%	99.99%	202	\$46.47	\$50.06	\$3.59	7.73%	8
9	10% to 15%	1	0.00%	100.00%	264	\$57.51	\$63.27	\$5.76	10.02%	9
10	15% to 17.5%	1	0.00%	100.00%	81	\$15.55	\$18.22	\$2.67	17.17%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	42,358	100.00%	100.00%	630	\$207.30	\$199.63	-\$7.67	-3.70%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
Non-CARE, Winter, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	11	0.03%	0.03%	286	\$76.32	\$71.78	-\$4.54	-5.95%	2
3	-5% to -2%	247	0.58%	0.61%	429	\$124.01	\$120.74	-\$3.27	-2.64%	3
4	-2% to 0%	1,857	4.38%	4.99%	442	\$132.37	\$131.51	-\$0.86	-0.65%	4
5	0% to 2%	10,080	23.80%	28.79%	498	\$149.53	\$151.41	\$1.87	1.25%	5
6	2% to 5%	25,691	60.65%	89.44%	505	\$150.14	\$155.08	\$4.93	3.28%	6
7	5% to 7.5%	4,119	9.72%	99.17%	428	\$124.16	\$131.34	\$7.17	5.78%	7
8	7.5% to 10%	326	0.77%	99.94%	384	\$110.13	\$119.22	\$9.08	8.25%	8
9	10% to 15%	27	0.06%	100.00%	349	\$100.46	\$111.51	\$11.05	11.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	42,358	100.00%	100.00%	492	\$146.18	\$150.34	\$4.15	2.84%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
Non-CARE, Annual, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	7	0.08%	0.08%	327	\$103.56	\$98.13	-\$5.43	-5.24%	2
3	-5% to -2%	628	6.76%	6.84%	502	\$159.89	\$155.77	-\$4.11	-2.57%	3
4	-2% to 0%	4,688	50.48%	57.32%	590	\$183.51	\$182.10	-\$1.41	-0.77%	4
5	0% to 2%	3,754	40.42%	97.74%	515	\$155.01	\$155.97	\$0.96	0.62%	5
6	2% to 5%	200	2.15%	99.89%	370	\$106.62	\$109.40	\$2.78	2.61%	6
7	5% to 7.5%	9	0.10%	99.99%	250	\$69.82	\$73.94	\$4.12	5.90%	7
8	7.5% to 10%	1	0.01%	100.00%	208	\$56.81	\$61.77	\$4.96	8.73%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	9,287	100.00%	100.00%	548	\$168.55	\$168.01	-\$0.54	-0.32%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
Non-CARE, Summer, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	6	0.07%	0.07%	273	\$96.75	\$86.03	-\$10.72	-11.08%	1
2	-10% to -5%	1,762	18.97%	19.04%	600	\$209.83	\$197.16	-\$12.66	-6.03%	2
3	-5% to -2%	5,517	59.41%	78.44%	638	\$211.04	\$203.66	-\$7.39	-3.50%	3
4	-2% to 0%	1,633	17.58%	96.03%	415	\$124.88	\$123.26	-\$1.62	-1.30%	4
5	0% to 2%	297	3.20%	99.23%	349	\$97.58	\$98.28	\$0.70	0.72%	5
6	2% to 5%	66	0.71%	99.94%	367	\$100.00	\$102.96	\$2.96	2.96%	6
7	5% to 7.5%	6	0.07%	100.00%	303	\$72.79	\$77.07	\$4.28	5.88%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	9,287	100.00%	100.00%	580	\$191.08	\$184.04	-\$7.04	-3.68%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
Non-CARE, Winter, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	3	0.03%	0.03%	318	\$83.89	\$78.87	-\$5.02	-5.98%	2
3	-5% to -2%	112	1.21%	1.24%	371	\$101.97	\$99.06	-\$2.92	-2.86%	3
4	-2% to 0%	621	6.69%	7.93%	437	\$123.53	\$122.67	-\$0.86	-0.70%	4
5	0% to 2%	2,500	26.92%	34.84%	560	\$163.88	\$165.87	\$1.99	1.21%	5
6	2% to 5%	4,828	51.99%	86.83%	556	\$161.95	\$167.26	\$5.31	3.28%	6
7	5% to 7.5%	1,052	11.33%	98.16%	413	\$116.07	\$122.85	\$6.78	5.84%	7
8	7.5% to 10%	146	1.57%	99.73%	305	\$82.96	\$89.92	\$6.97	8.40%	8
9	10% to 15%	25	0.27%	100.00%	254	\$68.30	\$75.84	\$7.54	11.04%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	9,287	100.00%	100.00%	526	\$152.46	\$156.56	\$4.10	2.69%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
CARE, Annual, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	4	0.04%	0.04%	230	\$46.83	\$44.22	-\$2.61	-5.57%	2
3	-5% to -2%	619	6.53%	6.57%	436	\$87.20	\$84.78	-\$2.42	-2.78%	3
4	-2% to 0%	3,890	41.02%	47.59%	462	\$88.25	\$87.63	-\$0.62	-0.70%	4
5	0% to 2%	4,799	50.60%	98.19%	414	\$76.47	\$76.92	\$0.45	0.59%	5
6	2% to 5%	171	1.80%	99.99%	307	\$54.98	\$56.41	\$1.43	2.60%	6
7	5% to 7.5%	1	0.01%	100.00%	181	\$31.39	\$33.04	\$1.65	5.26%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	9,484	100.00%	100.00%	433	\$81.59	\$81.44	-\$0.16	-0.20%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
CARE, Summer, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	12	0.13%	0.13%	349	\$78.40	\$70.12	-\$8.28	-10.56%	1
2	-10% to -5%	1,596	16.83%	16.96%	499	\$105.92	\$99.37	-\$6.55	-6.18%	2
3	-5% to -2%	5,920	62.42%	79.38%	510	\$100.47	\$97.17	-\$3.30	-3.29%	3
4	-2% to 0%	1,675	17.66%	97.04%	416	\$76.00	\$74.97	-\$1.04	-1.37%	4
5	0% to 2%	237	2.50%	99.54%	394	\$69.61	\$70.03	\$0.42	0.60%	5
6	2% to 5%	41	0.43%	99.97%	393	\$65.33	\$67.29	\$1.96	3.00%	6
7	5% to 7.5%	2	0.02%	99.99%	559	\$92.01	\$96.92	\$4.91	5.34%	7
8	7.5% to 10%	1	0.01%	100.00%	339	\$49.54	\$53.43	\$3.89	7.85%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	9,484	100.00%	100.00%	488	\$96.11	\$92.77	-\$3.34	-3.48%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
CARE, Winter, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	1	0.01%	0.01%	242	\$39.38	\$37.39	-\$1.99	-5.05%	2
3	-5% to -2%	58	0.61%	0.62%	370	\$65.56	\$63.67	-\$1.90	-2.90%	3
4	-2% to 0%	336	3.54%	4.17%	412	\$75.21	\$74.67	-\$0.54	-0.72%	4
5	0% to 2%	1,991	20.99%	25.16%	427	\$77.96	\$78.94	\$0.98	1.26%	5
6	2% to 5%	5,675	59.84%	85.00%	405	\$73.08	\$75.51	\$2.43	3.33%	6
7	5% to 7.5%	1,261	13.30%	98.29%	313	\$54.82	\$58.01	\$3.19	5.82%	7
8	7.5% to 10%	142	1.50%	99.79%	261	\$45.31	\$49.07	\$3.76	8.30%	8
9	10% to 15%	20	0.21%	100.00%	246	\$42.58	\$47.32	\$4.75	11.16%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	9,484	100.00%	100.00%	395	\$71.23	\$73.34	\$2.12	2.98%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
CARE, Annual, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	3	0.06%	0.06%	326	\$64.90	\$61.47	-\$3.43	-5.29%	2
3	-5% to -2%	255	5.42%	5.48%	374	\$71.02	\$69.14	-\$1.88	-2.65%	3
4	-2% to 0%	2,152	45.73%	51.21%	436	\$81.07	\$80.46	-\$0.61	-0.75%	4
5	0% to 2%	2,167	46.05%	97.26%	404	\$73.56	\$74.06	\$0.50	0.68%	5
6	2% to 5%	126	2.68%	99.94%	334	\$59.60	\$61.12	\$1.53	2.57%	6
7	5% to 7.5%	3	0.06%	100.00%	270	\$48.32	\$51.14	\$2.82	5.84%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	4,706	100.00%	100.00%	415	\$76.46	\$76.35	-\$0.11	-0.14%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
CARE, Summer, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	6	0.13%	0.13%	297	\$64.71	\$57.79	-\$6.92	-10.69%	1
2	-10% to -5%	1,082	22.99%	23.12%	421	\$87.28	\$81.89	-\$5.39	-6.18%	2
3	-5% to -2%	2,613	55.53%	78.64%	495	\$98.75	\$95.40	-\$3.35	-3.39%	3
4	-2% to 0%	820	17.43%	96.07%	391	\$71.57	\$70.64	-\$0.93	-1.30%	4
5	0% to 2%	145	3.08%	99.15%	342	\$59.75	\$60.16	\$0.41	0.69%	5
6	2% to 5%	37	0.79%	99.94%	302	\$49.21	\$50.59	\$1.38	2.80%	6
7	5% to 7.5%	3	0.06%	100.00%	269	\$39.63	\$41.94	\$2.31	5.83%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	4,706	100.00%	100.00%	453	\$89.70	\$86.46	-\$3.24	-3.61%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Inland Customers
CARE, Winter, All-Electric

Line	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	Line
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	5	0.11%	0.11%	344	\$56.13	\$52.36	-\$3.77	-6.72%	2
3	-5% to -2%	56	1.19%	1.30%	336	\$56.08	\$54.48	-\$1.60	-2.85%	3
4	-2% to 0%	252	5.36%	6.65%	401	\$69.57	\$69.08	-\$0.49	-0.70%	4
5	0% to 2%	1,007	21.40%	28.05%	420	\$73.52	\$74.42	\$0.90	1.22%	5
6	2% to 5%	2,339	49.70%	77.75%	396	\$68.48	\$70.80	\$2.33	3.40%	6
7	5% to 7.5%	833	17.70%	95.45%	346	\$59.09	\$62.63	\$3.54	5.99%	7
8	7.5% to 10%	188	4.00%	99.45%	304	\$51.59	\$55.87	\$4.27	8.28%	8
9	10% to 15%	25	0.53%	99.98%	285	\$48.49	\$53.75	\$5.26	10.85%	9
10	15% to 17.5%	1	0.02%	100.00%	218	\$36.79	\$42.75	\$5.96	16.20%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	4,706	100.00%	100.00%	388	\$67.01	\$69.13	\$2.13	3.18%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
Non-CARE, Annual, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	2	0.34%	0.34%	312	\$100.17	\$95.01	-\$5.16	-5.15%	2
3	-5% to -2%	69	11.86%	12.20%	690	\$222.76	\$216.86	-\$5.91	-2.65%	3
4	-2% to 0%	293	50.34%	62.54%	736	\$233.78	\$231.72	-\$2.06	-0.88%	4
5	0% to 2%	206	35.40%	97.94%	663	\$203.32	\$204.38	\$1.06	0.52%	5
6	2% to 5%	12	2.06%	100.00%	395	\$116.81	\$119.66	\$2.85	2.44%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	582	100.00%	100.00%	696	\$218.82	\$217.50	-\$1.32	-0.60%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
Non-CARE, Summer, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	106	18.21%	18.21%	877	\$308.40	\$289.19	-\$19.22	-6.23%	2
3	-5% to -2%	355	61.00%	79.21%	853	\$281.28	\$271.71	-\$9.58	-3.41%	3
4	-2% to 0%	100	17.18%	96.39%	468	\$143.13	\$141.18	-\$1.95	-1.36%	4
5	0% to 2%	15	2.58%	98.97%	568	\$165.24	\$166.35	\$1.11	0.67%	5
6	2% to 5%	3	0.52%	99.48%	641	\$178.50	\$183.55	\$5.05	2.83%	6
7	5% to 7.5%	2	0.34%	99.83%	141	\$33.27	\$35.22	\$1.94	5.83%	7
8	7.5% to 10%	1	0.17%	100.00%	373	\$83.44	\$90.80	\$7.35	8.81%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	582	100.00%	100.00%	779	\$257.77	\$248.17	-\$9.60	-3.72%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
Non-CARE, Winter, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	1	0.17%	0.17%	352	\$91.41	\$84.43	-\$6.98	-7.64%	2
3	-5% to -2%	7	1.20%	1.38%	402	\$110.32	\$106.92	-\$3.40	-3.08%	3
4	-2% to 0%	35	6.01%	7.39%	459	\$137.78	\$136.84	-\$0.94	-0.68%	4
5	0% to 2%	190	32.65%	40.04%	631	\$190.71	\$193.21	\$2.50	1.31%	5
6	2% to 5%	315	54.12%	94.16%	677	\$202.76	\$208.91	\$6.15	3.03%	6
7	5% to 7.5%	31	5.33%	99.49%	546	\$158.22	\$167.41	\$9.18	5.80%	7
8	7.5% to 10%	3	0.52%	100.00%	553	\$156.08	\$169.06	\$12.98	8.32%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	582	100.00%	100.00%	637	\$191.00	\$195.59	\$4.59	2.40%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
Non-CARE, Annual, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	31	6.87%	6.87%	682	\$205.30	\$200.23	-\$5.07	-2.47%	3
4	-2% to 0%	242	53.66%	60.53%	927	\$282.80	\$280.65	-\$2.15	-0.76%	4
5	0% to 2%	167	37.03%	97.56%	698	\$202.75	\$203.86	\$1.11	0.55%	5
6	2% to 5%	11	2.44%	100.00%	479	\$132.39	\$135.72	\$3.34	2.52%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	451	100.00%	100.00%	814	\$244.16	\$243.16	-\$1.01	-0.41%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
Non-CARE, Summer, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	78	17.30%	17.30%	942	\$322.87	\$303.65	-\$19.21	-5.95%	2
3	-5% to -2%	272	60.31%	77.61%	807	\$257.91	\$249.01	-\$8.90	-3.45%	3
4	-2% to 0%	85	18.85%	96.45%	715	\$220.34	\$217.63	-\$2.71	-1.23%	4
5	0% to 2%	9	2.00%	98.45%	1,067	\$334.05	\$337.63	\$3.58	1.07%	5
6	2% to 5%	5	1.11%	99.56%	290	\$73.73	\$75.60	\$1.87	2.54%	6
7	5% to 7.5%	2	0.44%	100.00%	265	\$61.89	\$66.08	\$4.19	6.77%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	451	100.00%	100.00%	810	\$260.67	\$251.58	-\$9.09	-3.49%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
Non-CARE, Winter, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	3	0.67%	0.67%	191	\$50.12	\$48.29	-\$1.83	-3.65%	3
4	-2% to 0%	40	8.87%	9.53%	811	\$230.42	\$228.06	-\$2.36	-1.02%	4
5	0% to 2%	189	41.91%	51.44%	842	\$243.49	\$246.15	\$2.66	1.09%	5
6	2% to 5%	188	41.69%	93.13%	827	\$232.32	\$239.70	\$7.38	3.18%	6
7	5% to 7.5%	26	5.77%	98.89%	710	\$194.15	\$205.76	\$11.61	5.98%	7
8	7.5% to 10%	5	1.11%	100.00%	517	\$137.89	\$149.05	\$11.16	8.09%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	451	100.00%	100.00%	818	\$232.37	\$237.14	\$4.76	2.05%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
CARE, Annual, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	2	6.67%	6.67%	163	\$33.10	\$31.38	-\$1.72	-5.20%	2
3	-5% to -2%	4	13.33%	20.00%	483	\$91.85	\$89.05	-\$2.81	-3.06%	3
4	-2% to 0%	17	56.67%	76.67%	674	\$130.58	\$129.54	-\$1.04	-0.80%	4
5	0% to 2%	5	16.67%	93.33%	632	\$119.40	\$120.16	\$0.76	0.64%	5
6	2% to 5%	2	6.67%	100.00%	469	\$84.87	\$87.04	\$2.18	2.57%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	30	100.00%	100.00%	594	\$114.01	\$113.20	-\$0.81	-0.71%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
CARE, Summer, Basic

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	11	36.67%	36.67%	580	\$121.29	\$113.63	-\$7.65	-6.31%	2
3	-5% to -2%	15	50.00%	86.67%	640	\$128.84	\$124.05	-\$4.79	-3.72%	3
4	-2% to 0%	4	13.33%	100.00%	497	\$86.01	\$85.20	-\$0.81	-0.94%	4
5	0% to 2%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	5
6	2% to 5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	30	100.00%	100.00%	599	\$120.36	\$115.05	-\$5.31	-4.41%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
CARE, Winter, Basic

Line	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	Line
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	3
4	-2% to 0%	3	10.00%	10.00%	534	\$103.14	\$102.78	-\$0.36	-0.35%	4
5	0% to 2%	10	33.33%	43.33%	549	\$98.37	\$99.37	\$1.00	1.02%	5
6	2% to 5%	16	53.33%	96.67%	631	\$118.72	\$122.32	\$3.60	3.03%	6
7	5% to 7.5%	1	3.33%	100.00%	528	\$91.49	\$97.15	\$5.66	6.19%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	30	100.00%	100.00%	590	\$109.47	\$111.88	\$2.41	2.20%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
CARE, Annual, All-Electric

Line	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	Line
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	1	6.25%	6.25%	489	\$88.97	\$85.80	-\$3.17	-3.56%	3
4	-2% to 0%	9	56.25%	62.50%	725	\$134.70	\$133.65	-\$1.04	-0.77%	4
5	0% to 2%	6	37.50%	100.00%	672	\$120.29	\$121.17	\$0.89	0.74%	5
6	2% to 5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	16	100.00%	100.00%	690	\$126.44	\$125.98	-\$0.45	-0.36%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
CARE, Summer, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	5	31.25%	31.25%	854	\$180.08	\$169.05	-\$11.03	-6.13%	2
3	-5% to -2%	9	56.25%	87.50%	656	\$125.16	\$120.68	-\$4.48	-3.58%	3
4	-2% to 0%	2	12.50%	100.00%	234	\$40.50	\$39.78	-\$0.72	-1.78%	4
5	0% to 2%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	5
6	2% to 5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	16	100.00%	100.00%	665	\$131.74	\$125.68	-\$6.06	-4.60%	15

Typical Residential Energy Charges Current June 1, 2019 Rates Vs Elimination of Seasonality Proposed Rates
Schedule TOU DR-1
Mountain Customers
CARE, Winter, All-Electric

Line										Line
No.	Percent Impact Group	Number of Customers	Percent of Total Customers	% of Customers Cumulative	Avg kWh for the Range	Average Bill Current Effective Rate	Average Bill Proposed Elimination	Average Change (\$)	Average Change(%)	No.
1	<-10%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	1
2	-10% to -5%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	2
3	-5% to -2%	0	0.00%	0.00%	0	\$0.00	\$0.00	\$0.00	0.00%	3
4	-2% to 0%	1	6.25%	6.25%	722	\$119.81	\$119.66	-\$0.15	-0.13%	4
5	0% to 2%	4	25.00%	31.25%	440	\$73.37	\$74.34	\$0.97	1.32%	5
6	2% to 5%	11	68.75%	100.00%	804	\$140.82	\$145.65	\$4.83	3.43%	6
7	5% to 7.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	7
8	7.5% to 10%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	8
9	10% to 15%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	9
10	15% to 17.5%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	10
11	17.5% to 20%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	11
12	20% to 25%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	12
13	25% to 30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	13
14	>30%	0	0.00%	100.00%	0	\$0.00	\$0.00	\$0.00	0.00%	14
15	TOTAL	16	100.00%	100.00%	708	\$122.65	\$126.20	\$3.55	2.89%	15