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February 13, 2023

THE PUBLIC UTILITIES BOARD OF MANITOBA 400-330 Portage Avenue Winnipeg, Manitoba R3C 0C4

ATTENTION: Dr. D. Christle, Board Secretary and Executive Director

Dear Dr. Christle:

RE: MANITOBA HYDRO'S 2023/24 & 2024/25 GENERAL RATE APPLICATION — REVISED ROUND I IR RESPONSE

Manitoba Hydro filed responses to Round I Information Requests of the Public Utilities Board ("PUB") on February 3, 2023. In the response to part e) of COALITION/MH I-131, Manitoba Hydro inadvertently inserted a duplicate table located on page 14 and page 15 of the original response. Enclosed please find a revised response to COALITION/MH I-131a-e that includes an updated table located on page 15. Page 16 has been removed due to a minor formatting error. Manitoba Hydro has also updated the response on its external website.

Should you have any questions with respect to the foregoing, please do not hesitate to contact the writer at 204-360-3257.

Yours truly,

**MANITOBA HYDRO LEGAL SERVICES** 

Per:

*for:* Brent Czarnecki Senior Counsel



### **REFERENCE:**

Tab 8, Section 8.3, pg. 7, Appendix 8.1, Table B1, pg. 22

### PREAMBLE TO IR (IF ANY):

MH states:

"PCOSS24 has been prepared using the Corporation's preliminary budget for the 2023/24 fiscal year."

### **QUESTION:**

- a) Please identify and explain what components of MH's PCOSS24 2023/24 revenue requirement (Table B1) are based on a "preliminary budget".
  - i. Please identify and explain what components of MH's PCOSS24 2024/25 revenue requirement are based on a "preliminary budget".
- b) Please explain what level of detail was available for each revenue requirement component based on a "preliminary budget" for purposes of the PCOSS, for each of the two test years, 2023/24 & 2024/25.
- c) For each revenue requirement component, for each of the two test years 2023/24 & 2024/25, please compare and contrast the quality and level of input cost data was available for PCOSS24, compared to the quality and level of input cost data available for past cost of service studies. Please provide both a qualitative response, as well as a quantitative response.
- d) Please summarize and provide the PCOSS sensitivities that MH prepared to understand the potential variability in outcomes for PCOSS24 in both the 2023/24 and 2024/25 Test Years as a result of the preliminary MH budget. If no PCOSS sensitivities were prepared, please explain why not.
- e) Please explain whether MH has prepared a sensitivity analysis of past prospective cost of service studies compared to actual to understand the degree in variability of cost-of-service results.
  - i. If the response is no, please provide a sensitivity analysis at a high level for the first test year of PCOSS18 and PCOSS21 that compares forecast to actual results.

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As part of the sensitivity analysis, please incorporate actual costs, revenue and load (customer numbers, demand and energy), keeping methodology for the PCOSS unchanged (to isolate the PCOSS results between forecast and actual). Please provide a summary of the results and indicative Table A1 schedules.

- ii. If the response is no, please explain the degree of reliance that can be placed on the results of PCOSS24 for purposes of establishing class rate differentiation and rates.
- iii. Please summarize and provide all supporting schedules associated with the change in PCOSS18 results associated with the PUB's rate direction flowing from Order 59/18.

#### **RESPONSE:**

Response to parts a) to d):

All components of the revenue requirements for PCOSS24 are based on the 2023/24 Preliminary Budget.

The 2023/24 budget will be considered 'Preliminary' until final approval is received as described in Manitoba Hydro's response to COALITION/MH I-66b. The 'Preliminary' status does not affect the level of details available for use in the PCOSS.

The revenue requirement details available for PCOSS24 are consistent with past studies, with the exception of the modified O&A expenses that were used in PCOSS18. For PCOSS18 a detailed O&A budget that reflected the new corporate structure was not yet complete, so Manitoba Hydro used the best available detailed budget data (2016/17 from IFF15) with adjustments for known target changes. PCOSS24 uses the current detailed O&A budgeting process that was completed in September 2022.

Since the 2023/24 Preliminary Budget used for PCOSS24 provided the same level of details as the forecasts used for previous studies, no additional sensitives were specifically warranted or prepared for PCOSS24.

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Manitoba Hydro has not prepared a version of PCOSS24 based on the 2024/25 test year and therefore cannot provide the requested results for "PCOSS24 - 2024/25 Test Year". Please see Manitoba Hydro's response to COALITION/MH I-130a.

e) Manitoba Hydro has not prepared an Actual Cost of Service Study (ACOSS) for either 2018 or 2021. Manitoba Hydro does not typically prepare ACOSS and has not used them in an attempt to understand variability in COS results.

Manitoba Hydro's PCOSS has been developed with a deliberate effort to avoid and eliminate variability wherever possible. The second test year is used for the study in part because it includes average export revenues that consider a range of flow data and is also less likely to be impacted by abnormal levels of water in storage compared to the first test year. Other inputs that help minimize variability include the use of weather normalized customer load, and load research that is averaged over eight years to develop normalized estimates of class demand. A PCOSS prepared on this basis is the appropriate benchmark to use to guide gradual adjustments to rates in order to achieve target RCCs over the long term.

i. The request to prepare a sensitivity of PCOSS18 and PCOSS21 using "actual costs, revenue and load" would entail the preparation of a full ACOSS for those years. Due to time constraints and lack of readily available data in the appropriate format for use in the ACOSS, Manitoba Hydro is not able to provide the requested studies.

However, Manitoba Hydro has prepared versions of PCOSS18 and PCOSS21 incorporating the actual export revenues for those years since these revenues are potentially the most significant source of variability and are readily incorporated into the study. Net Export Revenue has been estimated by assigning variable cost based on the ratio of net to gross export revenue in PCOSS18 and PCOSS21. Net income has been adjusted for the change in Net Export Revenue in all scenarios.

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The following schedules provide the results of a version of PCOSS18 that incorporates the \$436.9 million of actual export revenues for 2017/18, a reduction of \$19M compared to the unrevised PCOSS18.

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Manitoba Hydro
Prospective Cost Of Service Study
March 31, 2018
Revenue Cost Coverage Analysis
Coalition 131 e (i)
SUMMARY

	Total Cost	Class Revenue	RCC % Prior to	Net Export Revenue	Total Revenue	RCC % Current
Customer Class	(\$000)	(\$000)	NER	(\$000)	(\$000)	Rates
Residential	803,638	607,106	75.5%	155,389	762,495	94.9%
General Service - Small Non Demand	150.461	139,479	92.7%	30.056	169.535	112.7%
General Service - Small Demand	183,506	146,983	80.1%	38,491	185,474	101.1%
General Service - Medium	251,132	191,737	76.3%	55,169	246,907	98.3%
General Service - Large 0 - 30kV	119,310	89,652	75.1%	28,429	118,081	99.0%
General Service - Large 30-100kV*	86,211	69,995	81.2%	24,054	94,049	109.1%
General Service - Large >100kV* *Includes Curtailment Customers	228,678	180,458	78.9%	67,246	247,704	108.3%
SEP	737	844	114.5%	-	844	114.5%
Area & Roadway Lighting	22,794	21,571	94.6%	1,423	22,994	100.9%
Total General Consumers	1,846,467	1,447,826	78.4%	400,257	1,848,083	100.1%
Diese!	8,984	7,368	82.0%	-	7,368	82.0%
Export	36,628	436,885	1192.7%	(400,257)	36,628	100.0%
Total System	1,892,080	1,892,080	100.0%	-	1,892,080	100.0%

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Manitoba Hydro Prospective CostOf Service Study - March 31, 2018 Customer, Demand, Energy Cost Analysis Coalition 131 e (i) SUMMARY

-	CU	STOMER			D EM AN D			ENERGY			
Class	Cost (\$000)	Number of Customers	Unit Cost S/Month	Cost (\$000)	% Recovery	Billable Demand MVA	Unit Cost S/KVA	Cost (\$000)	Metered Energy mWh	Unit Cost	
Residential	77,669	508,242	12.73	386,164	0%	n/a	n/a	184,416	7,586,096	7.52	**
GS Smill - Non Demand GS Smill - Demand	13,941 12,274	42,707 4,197	27.29 243.70	67,281 81,228	0% 37%	n/a 2,623	n/a 11.40	39,182 51,514	1,622,627 2,146,454	6.56 4.79	**
General Service - Medium	9,490	2,125	372.14	109,814	92%	7,722	13.08	76,659	3,204,436	2.67	
General Service - Large <30kV General Service - Large 30-100kV General Service - Large >100kV	3,522 2,457 5,816	321 40 16	n/a n/a n/a	45,963 23,232 53,078	900% 900% 900%	4,302 3,358 7,815	11.50 * 7.65 * 7.54 *	41,396 36,468 102,538	1,745,362 1,578,519 4,504,939	2.37 2.31 2.28	
SEP	67	31	180.55	90	0%	n/a	n/a	580	25,500	2.63	**
Area & Roadway Lighting	16,102	157,982	8.49	3,266	0%	n/a	n/a	2,003	82,415	6.39	**
Total General Consumers	141,338	715,661		770,115		25,818		534,758	22,496,347		
Diesel	395	785	41.89		0%	n/a	n/a	8,589	14,546	59.05	**
Export	n/a	n/a	n/a	-	0%	n/a	n/a	36,628	8,557,000	0.43	***
Total System	141,732	716,446		770,115		25,818		579,976	31,067,893		_

<sup>\*-</sup> includes recovery of customer costs \*\*- includes recovery of demand costs

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<sup>\*\*\* -</sup> includes recovery of customer and demand costs



Manitoba Hydro
Prospective Cost Of Service Study - March 31, 2018
Functional Breakdown
Coalition 131 o(i)
SUMMARY

Class	Total Cost (S000)	Generation Cost (S000)	%	Transmission Cost (\$0.00)	Su %	btransmission Cost (\$000)	%	Distribution Cust Service Cost (\$000)	%	Distribution Plant Cost (\$000) 9	%
Residential	648,249	292,649	45.1%	66,944	10.3%	36,835	5.7%	73,542	11.3%	178,279	27.5%
General Service - Small Non Demand	120,405	57.859	48.1%	11,695	9.7%	6.386	5.3%	12.637	10.5%	31.827	26.4%
General Service - Small Demand	145,015	74,573	51.4%	14,500	10.0%	7,898	5.4%	7,790	5.4%	40,254	27.8%
General Service - Medium	195,963	107,895	55.1%	19,776	10.1%	10,726	5.5%	8,286	4.2%	49,280	25.1%
General Service - Large < 30kV	90.881	56,274	61.9%	9,514	10.5%	5,129	5.6%	2.911	3.2%	17,051	18.8%
General Service - Large 30-100kV	62,157	48,128	77.4%	7,535	12.1%	4,036	6.5%	2,178	3.5%	279	0.4%
General Service - Large > 100kV	161,433	134,671	83.4%	20,946	13.0%	0	0.0%	5,577	3.5%	239	0.1%
SEP	737	580	78.7%	90	12.2%	0	0.0%	44	6.0%	23	3.1%
Area & Roadway Lighting	21,371	2,792	13.1%	501	2.3%	271	1.3%	911	4_3%	16,896	79.1%
Total General Consumers	1,446,211	775,422	53.6%	151,501	10.5%	71,282	4.9%	113,878	7.9%	334,128	23.1%
Diesel	8,984	8,589	95.6%	0	0.0%	0	0.0%	0	0.0%	395	4.4%
Export	36,628	36,628	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total System	1,491,823	820,640	55.0%	151,501	10.2%	71,282	4.8%	113,878	7.6%	334,523	22.4%

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The following schedules provide the results of a version of PCOSS21 that incorporates the \$610.9 million of actual export revenues for 2020/21, a reduction of \$27.1 million compared to the unrevised PCOSS21.

Manitoba Hydro
Prospective Cost Of Service Study
March 31, 2021
Revenue Cost Coverage Analysis
Coalition 131 e (I)
5 U M M A R Y

Customer Class	Total Cost (\$ million)	Class Revenue (\$ million)	RCC% Prior to NER	Net Export Revenue (\$ million)	Net Cost (\$ million)	RCC % Current Rates
Residential	1,023.1	770.5	75.3%	223.3	799.8	96.3%
General Service - Small Non Demand General Service - Small Demand	195.0 239.1	171.9 191.1	88.2% 79.9%	44.0 55.4	151.0 183.7	113.9% 104.0%
General Service - Medium	306.1	231.3	75.6%	73.2	232.9	99.3%
General Service - Large 0 - 30kV General Service - Large 30-100kV General Service - Large >100kV	170.9 139.7 280.2	121.4 102.4 197.5	71.1% 73.3% 70.5%	43.7 40.7 84.3	127.2 99.0 195.9	95.5% 103.4% 100.8% 111.6%
Area & Roadway Ughting	22.5	26.5	117.6%	1.2	21.3	124.1%
Total General Consumers	2,378.4	1,814.7	76.3%	565.7	1,812.7	100.1%
Diesel	11.1	9.0	81.7%	-	11.1	81.7%
Export	45.2	610.9	1350.9%	(565.7)	610.9	100.0%
Total System	2,434.7	2,434.7	100.0%	-	2,434.7	100.0%

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Manitoba Hydro
Prospective Cost Of Service Study - March 31, 2021
Customer, Demand, Energy Cost Analysis
Coolieon 131 e (i)
SUMMARY

	CI	U S T O M E R			D E M A N D				ENERGY			
Clara.	Cost (\$ million)	Number of Customers	Unit Cost \$/Month	Cost (\$ million)	% Removery	Billable Demand MVA	Unit Cost \$/MVA	Cost (\$ million)	Metered Energy mWh	Unit Cost C/kWh	_	
Residential	68.9	527,258	10.88	466.0	0%	n/a	n/a	264.9	7,694,424	9.50	••	
General Service - Small Non Demand General Service - Small Demand	11.6 12.0	55,586 13,805	17.45 72.30	81.8 97.4	0% 37%	n/a 2,609	n/a 13.93	57.6 74.4	1,683,573 2,187,796	8.28 6.19	**	
General Service - Medium	9.7	2,001	408.26	121.4	86%	6,991	15.00	101.8	3,005,213	3.94		
General Service - Large <306V General Service - Large 30-1006V General Service - Large > 100kV	3.2 1.9 3.4	351 44 18	m/la m/la m/la	61.0 35.7 64.0	100% 100% 100%	4,525 3,747 6,831	14.19 * 10.03 * 9.86 *	63.0 61.4 128.5	1,874,088 1,881,290 3,996,967	3.36 3.26 3.22		
SEP	0.1	32	259.54	0.2	0%	n/a	n/a	1.5	48,000	3.68	**	
Area & Roadway Lighting	17.4	160,140	9.05	23	0%	n/a	n/a	1.7	48,641	8.09	**	
Total General Consumers	128.1	759,235		929.8		24,703		754.8	22,419,941			
Diesel	8.0	784	81.19	-	0%	n/a	n/a	103	15,440	66.64	**	
Export	n/a	n/a	m/a	-	0%	n/a	n/a	45.2	10,442,000	0.43	•••	
Total System	128.9	760,019		929.8		24,703		810.3	32,877,382			

<sup>\*</sup>includes recovery of Customer costs

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<sup>\*\*</sup>includes recovery of Demand costs

<sup>\* \* \*</sup> includes recovery of Customer and Demand costs



Manitoba Hydro
Prospective Cost Of Service Study - March 31, 2021
Functional Breakdown
Conlition 131 e (i)
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Class	Total Cost (\$ million)	Generation Cost (5 million)	%	Transmission Cost (\$ million)	Su %	btransmission Cost (Smillion)	%	Distribution Cust Service (Smillion)	%	Distribution Plant Cost (Smillion)	%
	59	Sp mannary		59		54		54		14	
Residential	799.8	427.5	53.5%	81.5	10.2%	36.7	4.6%	65.0	8.1%	189.1	23.6%
General Service - Small Non Demand	1510	85.4	56.6%	14.7	9.7%	6.4	4.2%	10.6	7.0%	33.9	22.4%
General Service - Small Demand	183.7	108.1	58.8%	18.0	9.8%	7.8	4.2%	8.2	4.5%	41.7	22.7%
General Service - Medium	2329	143.7	61.7%	22.9	9.8%	9.7	4.2%	8.8	3.8%	47.9	20.5%
General Service - Large <30kV	1272	86.3	67.9%	13.1	10.3%	5.5	4.3%	2.7	2.1%	19.6	15.4%
General Service - Large 30-100kV	990	81.0	81.8%	11.5	11.6%	4.7	4.7%	1.6	1.7%	0.2	0.2%
General Service - Large > 100kV	195.9	168.2	85.9%	24.3	12.4%	-	0.0%	3.2	1.6%	0.2	0.1%
SEP	19	1.5	815%	0.2	13.2%	-	0.0%	0.1	4.3%	0.0	1.0%
Area & Roadway Lighting	213	2.3	11.0%	0.4	1.7%	0.2	0.7%	1.0	4.7%	17.5	81.9%
Total General Consumers	1,812.7	1,104.1	60.9%	1865	10.3%	70.9	3.9%	101.2	5.6%	350.0	19.3%
Diesel	11.1	10.3	93.1%	-	0.0%	-	0.0%	-	0.0%	0.8	6.9%
Export	45.2	45.2	100.0%	-	0.0%	-	0.0%		0.0%	-	0.0%
Total System	1,869.0	1,159.6	62.0%	1865	10.0%	70.9	3.8%	101.2	5.4%	350.8	18.8%

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ii. As noted in the response to part (a) the use of a 'Preliminary' budget does not reduce the quality of the input data and therefore PCOSS24 does not warrant any additional sensitivities or comparisons to actual results to verify its results. With consideration given to the long-standing and PUB endorsed Zone of Reasonableness of 95-105% which recognizes the many judgements required to functionalize, classify and allocate costs, there is no reason to not consider the results of PCOSS24 in determination of rates.

Please see Manitoba Hydro's response to COALITION/MH I-143 b) for further discussion of the use of ZOR when differentiating class rate increases.

iii. Manitoba Hydro assumes that "rate direction flowing from Order 59/18" refers to cost allocation related Directives 24 to 27 from that Order. Manitoba Hydro did not prepare a compliance filing of PCOSS18 that reflected the PUB directives from Order 59/18, however has prepared the following version of PCOSS18 which includes the methodology changes that could have been implemented immediately upon receipt of that Order without the need for further study.

These methodology changes include:

- The RCC calculation was changed to treat Net Export Revenue (NER) as a cost reduction, rather than an addition to class revenue (Directive 27).
- A non-tariffable transmission subfunction was added that is allocated the same as other transmission but does not receive a share of NER (Directive 24).
- A new subfunction was added to allocate building moves & safety watches, contact centre outages, line locates and marketing R&D to all classes other than GSL 30-100 and GSL >100 (Directive 25).

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The following table illustrates the impact of incorporating each of these directives on class RCCs from PCOSS18.

			Directive 24		
		Directive 27	Non Tariffable	Directive 25	59/18
	PCOSS18	NER in RCC	Transmission	GSL Customer	Compliant
Residential	94.8%	-1.3%	0.0%	-0.1%	93.4%
GSS ND	112.5%	3.2%	0.0%	-0.2%	115.5%
GSS D	101.0%	0.3%	0.0%	-0.2%	101.1%
GSM	98.3%	-0.5%	0.0%	-0.1%	97.7%
GSL 0-30	99.1%	-0.4%	0.1%	-0.2%	98.6%
GSL 30-100	109.3%	3.7%	0.1%	1.1%	114.2%
GSL >100	108.6%	3.7%	0.1%	1.0%	113.4%
A&RL	100.3%	0.0%	0.0%	-0.2%	100.1%

The following schedules reflect PCOSS18 incorporating the Directive 24, 25 and 27 methodology changes.

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Manitoba Hydro
Prospective Cost Of Service Study
March 31, 2018
Revenue Cost Coverage Analysis
Coalition I-131 e (iii)
S UMMARY

Customer Class	Total Cost (\$000)	Class Revenue (\$000)	RCC% Prior to NER	Net Export Revenue (\$000)	Net Cost (\$000)	RCC % Current Rates
Residential	811,993	607,106	74.8%	161,754	650,239	93.4%
General Service - Small Non Demand General Service - Small Demand	152,061 185,461	139,479 146,983	91.7% 79.3%	31,311 40,107	120,751 145,354	115.5% 101.1%
General Service - Medium	253,806	191,737	75.5%	57,505	196,301	97.7%
General Service - Large 0 - 30kV General Service - Large 30-100kV* General Service - Large > 100kV* *Includes Curtailment Customers	120,563 86,381 229,156	89,652 69,995 180,458	74.4% 81.0% 78.7%	29,645 25,092 70,090	90,918 61,289 159,066	98.6% 114.2% 113.4%
SEP	739	844	114.2%	-	739	114.2%
Area & Roadway Lighting	23,025	21,571	93.7%	1,483	21,542	100.1%
Total General Consumers	1,863,186	1,447,826	77.7%	416,987	1,446,199	100.1%
Diesel	8,996	7,368	81.9%	-	8,996	81.9%
Export	38,159	455,146	1192.7%	(416,987)	455,146	100.0%
Total System	1,910,341	1,910,341	100.0%	-	1,910,341	100.0%

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Chss

Residential

GS Small - Non Demand GS Small - Demand

## Manitoba Hydro 2023/24 & 2024/25 General Rate Application COALITION/MH I-131a-e (Revised)

Manitoba Hydro
Prospective Cost Of Service Study - March 31, 2018
Customer, Demand, Energy Cost Analysis
Coalidon 1-131 o (iii)
SUMMARY

CUSTOMER					D E M	ND		ENERGY				
Cost (\$000)	Number of Customers	Unit Cost S/Month		Cost (\$000)	% Recovery	Billable Demand MVA	Unit Cost S/KVA	Cost (\$000)	Metered Energy mWh	Unit Cost		
78,892	508,242	12.94		388,675	0%	m/a	n/a	182,673	7,586,096	7.53		
14,218 12,578	54,988 12,867	21.55 81.46	†	67,720 81,749	0% 37%	n/a 2,623	n/a 11.47	38,812 51,027	1,622,627	6.57		

General Service - Medium	9,851	2,125	386.31	110,516	92%	7,722	13.17	75,934	3,204,436	2.65	
General Service - Large <30kV General Service - Large 30-100kV General Service - Large >100kV	3,690 1,868 4,295	321 40 16	m/a m/a m/a	46,224 23,297 53,203	100% 100% 100%	4,302 3,358 7,815	11.60 * 7.50 * 7.36 *	41,005 36,123 101,569	1,745,362 1,578,519 4,504,939	2.35 2.29 2.25	
SEP	69	31	185.18	90	0%	n/a	n/a	580	25,500	2.63 *	*
Area & Roadway Lighting	16,268	157,982	8.58	3,289	0%	n/a	n/a	1,985	82,415	6.40 *	٠
Total General Consumers	141,729	736,612		774,763		25,818		529,708	22,496,347		
Diesel	396	785	42.06	-	0%	n/a	n/a	8,599	14,546	59.12 *	
Esport	n/a	n/a	n/a	-	0%	n/a	n/a	38,159	9,166,000	0.42 *	••
Total System	142,125	737,397		774,763		25,818		576,466	31,676,893		
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<sup>\* -</sup> includes recovery of customer costs

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<sup>\*\* -</sup> includes recovery of demand costs

<sup>\*\*\* -</sup>in cludes recovery of customer and demand costs



Manitoba Hydro
Prospective Cost Of Service Study - March 31, 2018
Functional Breakdown
Coalition I-131 e (iii)
SUMMARY

Class	Total Cost (\$000)	Generation Cost (\$000)	%	Transmission Cost (\$000)	Su %	btransmission Cost (\$000)	%	Distribution Cust Service Cost (\$000)	%	Distribution Plant Cost (\$000)	%
Residential	650,239	290,182	44.6%	67,864	10.4%	37,236	5.7%	74,729	11.5%	180,228	27.7%
General Service - Small Non Demand General Service - Small Demand	120,751 145,354	57,364 73,933	47.5% 50.9%	11,853 14,696	9.8% 10.1%	6,456 7,984	5.3% 5.5%	12,904 8,063	10.7% 5.5%	32,173 40,679	26.6% 28.0%
General Service - Medium	196,301	106,963	54.5%	20,040	10.2%	10,843	5.5%	8,638	4.4%	49,817	25.4%
General Service - Large <30kV General Service - Large 30-100kV General Service - Large >100kV	90,918 61,289 159,066	55,785 47,707 133,490	61.4% 77.8% 83.9%	9,640 7,633 21,282	10.6% 12.5% 13.4%	5,185 4,080 0	5.7% 6.7% 0.0%	3,075 1,588 4,054	3.4% 2.6% 2.5%	17,234 281 241	19.0% 0.5% 0.2%
SEP	739	580	78.5%	90	12.2%	0	0.0%	46	6.2%	23	3.1%
Area & Roadway Lighting	21,542	2,768	12.9%	507	2.4%	274	1.3%	951	4.4%	17,041	79.1%
Total General Consumers	1,446,199	768,772	53.2%	153,606	10.6%	72,057	5.0%	114,047	7.9%	337,717	23.4%
Diesel	8,996	8,599	95.6%	0	0.0%	0	0.0%	0	0.0%	396	4.4%
Export	38,159	38,159	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total System	1,493,354	815,531	54.6%	153,606	10.3%	72,057	4.8%	114,047	7.6%	338,114	22.6%

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