BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan	)))))))	Case No. 23-301-EL-SSO

DIRECT TESTIMONY OF

BRANDON S. MCMILLEN

ON BEHALF OF

OHIO EDISON COMPANY
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
THE TOLEDO EDISON COMPANY

APRIL 5, 2023

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Brandon McMillen. My business address is 76 South Main Street, Akron, OH 44308.

Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?

A. I am employed by FirstEnergy Service Company ("FESC") as the Manager of Rates and Regulatory Affairs in the Ohio Rates and Regulatory Affairs department.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

A. I received a Bachelor of Science degree in Mathematics from University of Mount Union (formerly, Mount Union College) and a Master of Science degree in Mathematics from Youngstown State University. I joined FESC in July 2012 as an Analyst in the Ohio Rates and Regulatory Affairs department and have taken on roles of increasing responsibility within the department. In 2022, I was named to my current position.

Q. WHAT ARE YOUR RESPONSIBILITIES IN YOUR CURRENT POSITION?

A. My current responsibilities include managing the preparation of various riders for Ohio Edison Company ("OE"), The Cleveland Electric Illuminating Company ("CEI"), and The Toledo Edison Company ("TE") (collectively, the "Companies"). I also conduct various financial research and analyses for the Ohio Rates and Regulatory Affairs department, including, but not limited to, revenue requirements, return on investments and typical bill analyses.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO?

A. Yes. I testified before the Public Utilities Commission of Ohio ("Commission") on behalf of the Companies in Case No. 14-1297-EL-SSO and submitted written expert testimony in Case Nos. 17-2436-EL-UNC, 13-2173-EL-RDR, 14-1947-EL-RDR, 15-1843-EL-RDR, 16-2167-EL-RDR, 17-2277-EL-RDR, and 22-0704-EL-UNC.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to address the following aspects of the Companies' proposed fifth electric security plan ("ESP V"):

- Delivery Capital Recover Rider ("Rider DCR");
- Advanced Metering Infrastructure / Modern Grid Rider ("Rider AMI");
- Economic Load Response Program Rider ("Rider ELR") / Economic Development Rider ("Rider EDR");
- Inactive Riders;
- Energy Efficiency Cost Recovery Rider ("Rider EEC"); and
- Vegetation Management Cost Recovery Rider ("Rider VMC").

Q. ARE YOU SPONSORING ANY ATTACHMENTS?

A. Yes. I am sponsoring the following items:

- Attachment BSM-1 – Rider ELR Redline Tariff Sheets;
- Attachment BSM-2 – Rider EEC Calculations and supporting work papers;
- Attachment BSM-3 – Rider EEC Tariff Sheets;
- Attachment BSM-4 – Rider VMC Calculations and supporting work papers; and
- Attachment BSM-5 – Rider VMC Tariff Sheets.

II. DELIVERY CAPITAL RECOVERY RIDER

Q. WHAT IS RIDER DCR?

A. Rider DCR provides the Companies the opportunity to earn a return of and on plant-in-service associated with distribution, transmission, general and intangible plant (including allocated plant from FESC that supports the Companies), which was not included in the rate base from the Companies' last distribution rate case. Rider DCR also provides the Companies with the opportunity to recover property taxes, Commercial Activity Tax ("CAT"), and associated income taxes associated with these capital additions. The return earned on such plant is based on the approved cost of debt (currently 6.54%), return on equity (currently 10.5%), and capital structure (currently 51% debt and 49% equity). The net capital additions included in Rider DCR reflect gross plant in service not approved in the Companies' last distribution rate case, less growth in accumulated depreciation reserve, accumulated deferred income taxes and excess deferred income taxes resulting from the Tax Cuts and Jobs Act associated with plant in service. Any capital additions that are recovered elsewhere in the Companies' rates are excluded from Rider DCR. Rider DCR revenue is subject to annual caps.

Q. HOW LONG HAS RIDER DCR BEEN IN EFFECT?

A. Rider DCR was originally established as part of the Companies' second electric security plan ("ESP II") with an effective date of January 1, 2012. Subsequently, the Commission continued Rider DCR, with modifications, in the Companies' third electric security plan ("ESP III") and fourth electric security plan ("ESP IV").

Q. IS RIDER DCR SUBJECT TO PERIODIC UPDATES AND AUDITS?

A. Yes. Since inception of Rider DCR in 2012, the Companies have filed quarterly updates to Rider DCR and the Commission has conducted annual audits. Commission Staff and other parties are afforded an opportunity to review these quarterly updates to Rider DCR and to participate in the annual audit process. The most recent Rider DCR audit is being conducted in Case No. 22-0892-EL-RDR.

Q. ARE THE COMPANIES PROPOSING TO CONTINUE RIDER DCR FOR THE TERM OF ESP V?

A. Yes. The Companies are proposing to continue Rider DCR in its current form over the term of ESP V, with modifications to the annual revenue caps and to incorporate the impact of future base rate cases, as described in more detail below.

Q. HOW WILL THE ANNUAL RIDER DCR REVENUE CAPS CHANGE DURING THE TERM OF ESP V?

A**.** The annual aggregate Rider DCR revenue cap in effect for the last year of ESP IV (i.e., June 1, 2023, through May 31, 2024) is $390 million. The nominal value of the aggregate annual revenue caps during ESP V will be dependent on the timing of approval of new base rate cases during the term of ESP V as described in more detail below. In ESP V, the Companies are proposing that the annual aggregate Rider DCR revenue caps will increase, with the increased based on the Companies' System Average Interruption Frequency Index ("SAIFI") and Customer Average Interruption Duration Index ("CAIDI") reliability performance results from the prior year. For purposes of the revenue cap determination, the Companies will rely on their individual CAIDI and SAIFI results. The CAIDI and SAIFI metrics are more fully discussed in the testimony of Companies' Witness

Richardson. If all six of these CAIDI and SAIFI reliability standards are met in a given year, then the aggregate revenue cap increase in the next year will be $21 million; if five of six are met in a given year, the aggregate revenue cap increase in the next year will be $19 million; if four of six are met, the aggregate revenue cap increase in the next year will be $17 million. If the Companies fail to meet at least four of their six CAIDI or SAIFI standards, the aggregate revenue cap increase will be $15 million. In addition, the individual company annual revenue caps will continue to be the following percentages of the aggregate revenue caps: OE = 50%, CEI = 70%, and TE = 30%. Consistent with prior ESPs, the revenue caps will continue to be applied cumulatively from the inception of Rider DCR. For any year that the Companies' spending would result in cumulative revenue requirements in excess of the cumulative revenue cap, the overage shall be recovered in the following cap period subject to such period's cap. For any year the cumulative revenue collected under Rider DCR is less than the cumulative revenue cap allowance, as established above, then the difference between the revenue collected and the cap shall increase the level of the subsequent period's cap.

Q. WHAT IS THE BASIS FOR THE PROPOSED RIDER DCR REVENUE CAP INCREASES DURING THE TERM OF ESP V?

A. The proposed annual aggregate Rider DCR revenue cap increases of up to $21 million (assuming each of the Companies achieves both SAIFI and CAIDI reliability performance standards during a given year) are based on the Companies' actual revenue requirements. The Companies' aggregate revenue requirement based on rate base values as of November 30, 2017, was $275 million and was $383 million based on rate base values as of November 30, 2022, which is an average annual increase of approximately $21 million over the five-year period. As explained in the testimony of Companies' Witness Richardson, the Companies expect to invest in their delivery system during the term of ESP V at levels comparable to historic investments, which further supports the proposed revenue cap increases. The annual aggregate revenue cap increases of $15 million that would apply if the Companies do not achieve at least four of their CAIDI and SAIFI reliability standards in a given year is approximately equal to the Companies' average annual increases in depreciation and property tax expenses during the same five-year period, which increased from $474 million as of November 30, 2017, to $545 million as of November 30, 2022.

Q. WILL RIDER DCR CONTINUE TO BE UPDATED AND RECONCILED QUARTERLY OVER THE TERM OF ESP V?

A. Yes. Rider DCR will continue to be updated and reconciled quarterly using same the schedule that is currently used under ESP IV. The first quarterly filing for Rider DCR rates to be effective during ESP V will be made on or about March 31, 2024, with rates to be effective on June 1, 2024. Thereafter, the quarterly filings will be made on or about June 30, September 30, December 31, and March 31, with rates effective on September 1, December 1, March 1, and June 1, respectively, unless otherwise ordered by the Commission. The quarterly filings will be based on estimated balances as of August 31, November 30, February 28, and May 31, respectively, with any reconciliations between actual and forecasted information being recognized in the following quarter.

Q. WILL RIDER DCR CONTINUE TO BE SUBJECT TO ANNUAL AUDITS OVER THE TERM OF ESP V?

A. Yes. Rider DCR will continue to be subject to annual audits over the term of ESP V, with such audits conducted in the same manner as they are today under ESP IV. The audits will include an independent review to verify that the amounts for which recovery is sought are not unreasonable, with such determination made in light of the facts and circumstances known to the Companies at the time such expenditures were committed. The annual audits of Rider DCR will continue to be conducted following the Companies' Rider DCR filings on or about December 31 of each year during the ESP V term. Also, the expense for the annual Rider DCR audits over the ESP V period will continue to be paid by the Companies and be recoverable through Rider DCR, subject to the applicable revenue caps. Rider DCR remains subject to reconciliation, including, but not limited to increases or refunds based upon the results of the annual audits.

Q. WHAT ARE THE BENEFITS OF RIDER DCR?

A. Rider DCR helps support distribution investments to maintain safe and reliable service to customers and provides other administrative and regulatory benefits. Updating Rider DCR on a quarterly basis better aligns the costs customers pay with the investments made by the Companies, and helps promote gradualism in setting customer rates, including limiting annual revenue increases through the Rider DCR revenue caps. The proposed revenue caps discussed above also share in the risk of reliability performance by allowing the opportunity for a higher annual cap increase only in years when CAIDI and/or SAIFI reliability standards are met by the Companies. In addition, the quarterly updates and annual independent audits facilitate a timelier review of the Companies' distribution investments than would otherwise occur between distribution base rate cases. With quarterly updates and annual, independent audits, parties are continually afforded the opportunity to review and verify the reasonableness of the Companies' Rider DCR rates. Similarly, Rider DCR also provides the opportunity for an audit focused specifically on the costs included in Rider DCR, as opposed to being included as part of a broader review of all costs in a distribution base rate case, which could result in administrative benefits. While the costs included in Rider DCR would be recoverable even if the rider was not effective, continuation of Rider DCR and the associated audit process provide significant benefits to customers.

Q. HOW WILL RIDER DCR BE AFFECTED AFTER THE COMPANIES' BASE DISTRIBUTION RATE CASE IS APPROVED?

A. The Companies will file their next base distribution rate case in May 2024. Once the base distribution rate case is approved, rate base included in Rider DCR will be re-set to zero as of the date certain in the base distribution rate case. The Rider DCR revenue requirement for each of the Companies would then be calculated using incremental rate base compared to balances as of the date certain. The proposed annual aggregate Rider DCR revenue caps would be re-set to zero, as well, and would increase by up to $21 million per year going forward, as of the effective date of the new base distribution rates (assuming each of the Companies meets its SAIFI and CAIDI standards). For example, if new base distribution rates go into effect June 1, 2026, the aggregate Rider DCR revenue caps would be $411 million for June 2024 through May 2025 and $432 million for June 2025 through May 2026. The aggregate revenue cap would then re-set to $21 million for June 2026 through May 2027, and increase to $42 million for June 2027 through May 2028, and continue growing at $21 million per year until re-setting again. The foregoing assumes each of the Companies achieved its SAIFI and CAIDI reliability performance standards for each year. If the Companies fail to meet one or more of their CAIDI or SAIFI reliability performance standards, then the annual aggregate cap increases would adjust downward accordingly.

Additionally, Rider DCR will incorporate all applicable inputs that were approved in the base distribution case, including return on equity, cost of debt, capital structure, depreciation rates, revenue requirement allocations, and FESC allocation factors.

III. <u>ADVANCED METERING INFRASTRUCTURE / MODERN GRID RIDER</u>

Q. WHAT IS RIDER AMI?

A. Rider AMI is a non-bypassable rider that was most recently approved in the Companies' ESP IV to recover costs associated with the Ohio Site Deployment of the Smart Grid Modernization Initiative in Case No. 09-1820-EL-ATA ("SGMI"), as well as any costs of additional grid modernization programs. The terms and conditions for cost recovery are authorized by the Commission in the respective grid modernization cases. Currently, the only costs of additional grid modernization initiatives included in Rider AMI are those associated with the Companies' first phase of their grid modernization business plan, approved in Case No. 16-481-EL-UNC, et al. ("Grid Mod I"). Pursuant to ESP IV, Rider AMI is authorized to remain in effect until all costs of any approved portion of the Companies' grid modernization business plan are fully recovered. For example, in Case No. 22-0704-EL-UNC, the Companies filed an application for a second phase of their grid modernization business plan ("Grid Mod II"), with the costs to be recovered in Rider AMI.

Q. ARE THE COMPANIES PROPOSING TO CONTINUE RIDER AMI FOR THE TERM OF ESP V?

A. Yes. Unless otherwise directed by the Commission, cost recovery for SGMI and Grid Mod I in Rider AMI will continue consistent with current Commission authorization. Rider AMI will also include recovery of costs associated with additional grid modernization programs. The terms and conditions regarding cost recovery of any subsequently approved grid modernization programs in Rider AMI will be subject to Commission review and approval in the respective cases authorizing those future grid modernization programs.

Q. IS RIDER AMI SUBJECT TO PERIODIC UPDATES AND AUDITS?

A. Yes. Rider AMI is updated and reconciled on a quarterly basis. The Companies file updated Rider AMI rates on or about December 1, March 1, June 1, and September 1 of each year. Unless otherwise ordered by the Commission, the tariff rates become effective on the subsequent January 1, April 1, July 1, and October 1, respectively. Rider AMI is subject to annual audit by Commission Staff consistent with the audit process approved in ESP IV and Grid Mod I, which includes a review of all costs sought for recovery in Rider AMI.

Q. WHAT BENEFITS DOES RIDER AMI PROVIDE?

A. Rider AMI supports the Companies' investments in grid modernization programs, which have been designed to support enhanced reliability and make more granular usage data available to customers and market participants. Furthermore, updating Rider AMI on a quarterly basis better aligns the costs customers pay with the investments made by the Companies and helps promote more gradual rate impacts for customers than may otherwise occur. Continuation of the annual audit process allows for a timelier review of Rider AMI investments than may otherwise occur compared to the potential lag between distribution base rate cases. Rider AMI also provides the opportunity for an audit focused specifically on the costs included in Rider AMI, as opposed to being included as part of a broader review of all costs in a base rate case, thereby creating additional administrative benefits.

While the costs included in Rider AMI would be recoverable even without the rider, continuation of Rider AMI and the associated audit process provide benefits to customers.

Q. HOW MAY RIDER AMI BE AFFECTED BY A BASE DISTRIBUTION RATE CASE APPROVED DURING THE ESP V PERIOD?

A. If any costs recovered in Rider AMI are authorized by the Commission to be included in a future base rate case, then those costs will be removed from Rider AMI and will be subject to the terms and conditions of the base rate case. Otherwise, any costs recovered in Rider AMI would continue to be recovered through Rider AMI consistent with the terms and conditions described above.

IV. <u>ECONOMIC LOAD RESPONSE PROGRAM/ECONOMIC DEVELOPMENT RIDER</u>

Q. PLEASE DESCRIBE THE COMPANIES' RIDER ELR.

A. Rider ELR was originally authorized by the Commission in the Companies' first electric security plan ("ESP I"), and was continued with modifications in the Companies' ESP II, ESP III, and ESP IV. Rider ELR is a tariff-based interruptible program to support demand response and economic development. Customers participating in Rider ELR commit their curtailable load to the Companies, where they are subject to emergency curtailment events called by the Companies or by PJM. The participating Rider ELR customers currently have the opportunity to earn credits on their monthly electric bills through two credit provisions: (1) a $5 per kW of curtailable load per month credit under Rider ELR, which is recovered under the Companies' Demand Side Management and Energy Efficiency Rider ("Rider DSE1"); and (2) a $5 per kW of curtailable load per month credit under the

Economic Development Rider ("Rider EDR") provision (b), which is recovered under Rider EDR provision (e). Rider ELR customers cannot participate in any other load curtailment or demand response program, including any demand response programs offered by PJM. Per the terms of ESP IV, Rider ELR will expire June 1, 2024.

Q. WHAT IS THE COMPANIES' PROPOSAL FOR RIDER ELR IN ESP V?

A. The Companies propose to continue Rider ELR for customers participating in the program as of May 31, 2024, with two modifications. First, the Companies will no longer require Rider ELR customers to commit their demand response capabilities to the Companies, and instead will require Ride ELR customers to participate in PJM demand response programs through a curtailment service provider. This proposal is discussed in the testimony of Companies' Witness Stein. Second, through the end of the term of ESP V, the Companies propose reductions in the Rider ELR and Rider EDR(b) credits. The Companies believe this proposal strikes a reasonable balance between competing factors of continuing to support valuable demand response programs in their service territories, while also managing rate impacts to participating and non-participating customers.

Q. WHAT ARE THE PROPOSED RIDER ELR AND RIDER EDR(b) CREDITS FOR THE TERM OF ESP V?

A. The Companies propose to gradually step down both Rider ELR and Rider EDR(b) credits annually through the ESP V term. The $/kW credits for each year are proposed as follows:

Rider	June 1, 2024	June 1, 2025	June 1, 2026	June 1, 2027	June 1, 2028	June 1, 2029	June 1, 2030	June 1, 2031
ELR	($5.00)	($4.50)	($4.00)	($3.50)	($3.00)	($2.50)	($2.00)	($1.50)
EDR(b)	($5.00)	($4.50)	($4.00)	($3.50)	($3.00)	($2.50)	($2.00)	($1.50)

Q. WHAT IS THE BASIS FOR THE PROPOSED CREDITS FOR ESP V?

A. Continuation of the credits for participating Rider ELR customers is designed to incentivize and promote demand response and economic development in the Companies' service territories. Companies' Witness Stein further explains how the proposed step down of the credits better aligns the costs of the program with market pricing. In addition, the Companies are attempting to balance rate impacts to both participating Rider ELR customers who receive the credits and the other customers who pay for the credits. The Companies believe the proposed reductions are reasonable by (i) providing rate reductions to customers paying for the credits after year one of ESP V, (ii) mitigating rate shock and significant rate increases to participating Rider ELR customers, and (iii) continuing to support economic development and demand response.

Q. HOW WILL THE CREDITS BE CALCULATED?

A. Rider ELR and Rider EDR(b) credits will be calculated by multiplying the customers' curtailable load by the applicable credits each month, the same way as in ESP IV. The customer's curtailable load will be determined by subtracting the customer's firm load registered with PJM from its monthly highest thirty (30) minute integrated kW load occurring during the non-holiday weekday hours of 11 a.m. to 5 p.m. Eastern Standard Time. The curtailable load will continue to be capped at the customer's contract amount as of May 31, 2024. Minimum bill provisions from the Rider ELR tariff will continue to apply.

Q. HOW WILL THE CREDITS BE RECOVERED IN ESP V?

A. Rider ELR credits will continue to be recovered through Rider DSE1, and Rider EDR(b) credits will continue to be recovered in Rider EDR(e) for the term of ESP V.

Q. WILL ANY PJM REVENUES BE USED TO OFFSET THE COSTS OF THESE CREDITS TO OTHER CUSTOMERS?

A. No. Currently, the Companies are eligible to receive revenues from PJM if the Rider ELR demand response resources clear in the PJM capacity auctions, and 80% of those revenues are provided to customers to offset the costs of the Rider ELR and Rider EDR(b) credits. As explained in the testimony of Companies' Witness Stein, the Companies would no longer be eligible to receive any of these PJM revenues in ESP V. While customers would no longer receive the offset from PJM revenues, the historic levels of PJM revenues are less than the estimated rate reduction that other customers are expected to see from the annually decreasing credits discussed above. Over the term of ESP IV, average annual PJM revenue offsets for Rider ELR resources credited to customers were approximately $2 million. In comparison, the total annual credits provided to ELR customers were approximately $50 to $60 million, so decreasing the credit by $1 per kW per month each year of ESP V will decrease the total annual credits by an estimated average of $5 to $6 million per year, based on historical curtailable loads for Rider ELR customers.

Q. ARE THERE ANY OTHER PROPOSED CHANGES TO RIDER ELR?

A. Yes. As described in the testimony of Companies' Witness Stein, the Companies would no longer be responsible for any activities related to PJM-initiated emergency curtailment events. However, the Companies can still curtail Rider ELR resources during emergency events on the distribution system. If at any time during an emergency event a customer's actual measured load exceeds its firm load, that customer will be subject to penalties. The Companies propose changes to the Rider ELR tariff to remove provisions related to emergency curtailment events requested by PJM, and to revise the penalty tariff provision to be consistent with the changes proposed in Case No. 19-1968-EL-ATA in response to and in compliance with the Commission's Opinion and Order on May 15, 2019, in Case No. 13-2145-EL-CSS. A proposed redlined version of Rider ELR is included in Attachment BSM-1 to my testimony.

V. INACTIVE RIDERS

Q. DO THE COMPANIES HAVE ANY OUTSTANDING REGULATORY ASSET OR LIABILITY BALANCES ASSOCIATED WITH INACTIVE TARIFFS?

A. Yes. The Companies currently have several outstanding regulatory asset or liability balances associated with inactive or expired riders, or otherwise not currently included in active tariffs. The table below provides these outstanding regulatory asset (liability) balances as of December 31, 2022:

Rider / Tariff Provision	CEI	OE	TE	Balance
CEI Delta Revenue Recovery	$(299,603)	$-	$-	$(299,603)
Deferred Fuel Cost Recovery	$(282,883)	$(257,631)	$(24,387)	$(564,900)
Deferred Generation Cost Recovery	$(359,511)	$-	$-	$(359,511)
Deferred Transmission Cost Recovery Rider	$(67,653)	$(1,501,679)	$(310,113)	$(1,879,445)
Economic Development Rider Provision (g)	$(2,580,418)	$(3,608,677)	$(1,048,176)	$(7,237,271)
Fuel Rider	$-	$(387,975)	$(76,140)	$(464,114)
Green Resource Rider	$81,971	$103,611	$43,197	$228,780
Line Extension Cost Recover	$14,928	$6,521	$2,805	$24,254
Municipal Distribution Tax	$189,934	$(5,996,649)	$(454,422)	$(6,261,137)
Non-Residential Deferred Distribution Cost Recovery	$58,839	$(250,489)	$2,011,408	$1,819,758
Residential Deferred Distribution Cost Recovery	$(61,795)	$(444,038)	$2,675	$(503,158)
Transmission and Ancillary Services	$(106,497)	$(436,074)	$1,439,707	$897,135
Total	**$(3,412,688)**	**$(12,773,080)**	**$1,586,555**	**$(14,599,213)**

Q. WHAT IS THE COMPANIES' PROPOSAL FOR THESE BALANCES IN ESP V?

A. The Companies propose to include the net regulatory asset or liability for each Company in the initial Vegetation Management Cost Recovery Rider ("Rider VMC") rates for the period June 1, 2024, through May 31, 2025, as described below and demonstrated in

Attachment BSM-4. Effective June 1, 2024, the balances for these individual regulatory assets and liabilities will be set to zero, and the net balances will be transferred to Rider VMC. Also, all applicable riders will be removed from the Companies' tariffs effective June 1, 2024.

Q. IS THE COMPANIES' PROPOSAL REASONABLE?

A. Yes. While the individual regulatory asset and liability balances are associated with separate riders or tariff provisions that did not all have the same rate designs or apply to the same customers, the proposed approach to aggregate them and conduct a final reconciliation of the net balance is reasonable. This approach will ensure that customers have only paid for the Companies' actual costs and will result in aggregate cost reductions to customers. This proposal will also help streamline the Companies' tariffs by removing provisions that are no longer active, improve customer understanding of the tariffs, and mitigate potential concerns of future charges to customers through these mechanisms.

VI. ENERGY EFFICIENCY COST RECOVERY RIDER

Q. PLEASE EXPLAIN THE PROPOSED RIDER EEC.

A. The Companies propose to establish a new Rider EEC to recover costs of the Companies' proposed energy efficiency programs described by Companies' Witness Miller. Rider EEC will ensure that customers are paying the Companies' actual costs of the programs, including spreading out the costs over 8 years, with timely reconciliations and carrying charges, subject to annual regulatory review and audit.

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Q. HOW WILL RIDER EEC BE CALCULATED?

A. The initial Rider EEC rates will go into effect June 1, 2024, and the revenue requirement for each Company will be based on estimated program costs for the period June 1, 2024, through May 31, 2025. These costs will be spread over eight years to match the length of ESP V and to better align cost recovery with the measure lives, most of which are at least eight years, as explained in the testimony Companies' Witness Miller. The revenue requirement will also include carrying charges based on each Company's currently approved weighted average cost of capital ("WACC") and a gross-up for CAT. Also starting in June 2024, the Companies will track the monthly actual Rider EEC revenues and expenses, and the difference will be deferred, with carrying charges at the currently applicable WACC. Following the initial rate filing, Rider EEC will be reconciled and updated annually on or about May 1st with rates to go into effect on the following June 1st, unless otherwise ordered by the Commission. The Rider EEC revenue requirement in the annual rider updates will be based on estimated expenses for the upcoming annual period, the same as the initial Rider EEC rates, but will also include the cumulative over or under collected balance. For each Company, the Rider EEC revenue requirement will be split between residential and non-residential customers based on the estimated costs of the programs. The estimated revenue requirements will then be divided by the estimated kWh sales for customers who did not opt-out of the programs to determine. The Rider EEC rates for all rate schedules will be on a per kWh basis. An example of the proposed revenue requirement and rate design calculations for Rider EEC are included in Attachment BSM-2. Also, the proposed Rider EEC tariff sheet is included in Attachment BSM-3.

Q. WILL RIDER EEC BE SUBJECT TO AUDIT?

A. Yes. In August of each year, the Companies will file an application with the Commission to initiate an audit of Rider EEC covering the prior year's rate. Rider EEC is subject to reconciliation, including, but not limited to increases or refunds, based upon the results of these annual audits.

Q. HAVE THE COMPANIES ESTIMATED CUSTOMER IMPACTS OF RIDER EEC?

A. Yes. Estimated bill impacts of Rider EEC are included in the typical bill analysis supported by Companies' Witness Patel. Spreading out the recovery of the energy efficiency program costs over the average measure lives will help mitigate rate impacts for customers. For example, the initial Rider EEC rates are estimated to result in bill impacts of approximately 0.2% for standard residential customers using 750 kWh per month, with similar year-over-year impacts over years 2 through 4, before leveling off in year 5 and starting to decrease in year 6, as shown in Attachment BSM-2. If the Companies did not spread out recovery over eight years, the estimated impacts would be five to six times higher, or approximately 1% for the initial year, as shown in Attachment BSM-2.

Q. HAVE THE COMPANIES IDENTIFED ANY BENEFITS TO CUSTOMERS FROM THE IMPLEMENTATION OF RIDER EEC?

A. Yes. The proposed Rider EEC will support the Companies' energy efficiency programs which are estimated to provide benefits to customers, as described by Companies' Witness Miller. In addition, as described above, once Rider EEC goes into effect, it would be subject to an annual review that covers a 12-month period. This process allows for a timelier review than may otherwise occur between base rate cases. It also provides the opportunity for an audit focused specifically on the Companies' energy efficiency program expenses, which should provide administrative benefits. As described above, the proposed rate design of Rider EEC supports customer affordability and mitigates initial rate impacts to customers by spreading out the recovery over 8 years.

VII. VEGETATION MANAGEMENT COST RECOVERY RIDER

Q. PLEASE EXPLAIN THE PROPOSED RIDER VMC.

A. The Companies propose to establish Rider VMC for recovery of incremental vegetation management O&M expenses compared to the baseline levels recovered in base distribution rates. Rider VMC is intended to mitigate the regulatory lag on vegetation management O&M expense and support the Companies' proposed enhanced vegetation management program described in the testimony of Companies' Witness Standish. Rider VMC will ensure that customers are paying only the Companies' actual vegetation management expense incurred, with timely reconciliations and carrying charges at the approved cost of long-term debt, subject to annual regulatory review and audit. If there is a base distribution rate case approved during the term of ESP V, the Companies would update all applicable inputs to the Rider VMC calculation, including the baseline expenses, the cost of long-term debt, and the rate schedule allocations based on the approved levels in the base distribution rate case.

Q. WHAT IS THE CURRENT BASELINE LEVEL OF VEGETATION MANAGEMENT EXPENSE INCLUDED IN BASE DISTRIBUTION RATES?

A. Based on records available to the Companies, the test year of their most recent base distribution rate case included vegetation management O&M expense of approximately $30 million.

Q. HOW WILL RIDER VMC BE CALCULATED?

A. The initial Rider VMC rates will go into effect June 1, 2024, and the revenue requirement for each Company will be based on estimated vegetation management O&M expenses in excess of the current baseline for the upcoming annual period June 1, 2024, through May 31, 2025, including a gross-up for CAT. The initial Rider VMC rates will also include the final reconciliation of inactive riders and tariff provisions, as described above. Also starting in June 2024, the Companies will track the monthly actual Rider VMC revenues and incremental vegetation management O&M expenses, and the difference will be deferred, with carrying charges at the currently applicable cost of long-term debt. Following the initial rate filing and continuing for the term of ESP V, Rider VMC will be reconciled and updated annually on or about May 1st with rates to go into effect on the following June 1st, unless otherwise ordered by the Commission. The Rider VMC revenue requirement in the annual rider updates will be calculated the same as the initial Rider VMC rates but will also include the estimated over or under collected balance as of May 31st of each year.[1] For each Company, the Rider VMC revenue requirement will be allocated to each rate schedule based on the revenue allocations from the Companies' last

[1] The Rider VMC revenue requirement calculation will include O&M expense associated with the accounting change directed by the PUCO in Case No. 17-2009-EL-RDR. Historically, these O&M expenses were approximately $15 to $20 million annually for the Companies.

base distribution rate case. The Rider VMC rate will be a per kWh charge or credit for all residential and lighting rate schedules and will be a per billing demand charge or credit for all commercial and industrial rate schedules. An example of the proposed revenue requirement and rate design calculations for Rider VMC, based on year one cost projections from Companies' Witness Standish, are included in Attachment BSM-4. Also, the proposed Rider VMC tariff sheet is included in Attachment BSM-5.

Q. WILL RECOVERY OF VEGETATION MANAGEMENT EXPENSE BE CAPPED DURING ESP V?

A. Yes. Total vegetation management O&M expense recovered over the 8-year term of ESP V will be capped at $759.8 million, the total estimated costs provided in the testimony of Companies' Witness Standish.

Q. WILL RIDER VMC BE SUBJECT TO AUDIT?

A. Yes. In October of each year, the Companies will file an application with the Commission to initiate an audit of Rider VMC covering the prior year's rate. Rider VMC is subject to reconciliation, including, but not limited to increases or refunds, based upon the results of these annual audits.

Q. HAVE THE COMPANY ESTIMATED CUSTOMER IMPACTS OF RIDER VMC?

A. Yes. Estimated bill impacts of Rider VMC are included in the ESP V typical bill analysis supported by Companies' Witness Patel. The initial Rider VMC rates are expected to result in average bill impacts of approximately 0.9% for standard residential customers using 750 kWh per month, and annual year-over-year impacts going forward are expected to be less, as shown in Attachment BSM-4.

Q. HAVE THE COMPANIES IDENTIFED ANY BENEFITS TO CUSTOMERS FROM THE IMPLEMENTATION OF RIDER VMC?

A. Yes. Rider VMC will support the Companies' enhanced vegetation management program, which is estimated to provide numerous benefits to customers, as described by Companies' Witness Standish. In addition, Rider VMC provides an opportunity to more frequently review the Companies' vegetation management costs than may otherwise occur. While the Companies expect that the costs included in proposed Rider VMC would be recoverable even if the rider was not effective, the Rider VMC and the associated audit process provide benefits to customers. As described above, once effective, Rider VMC would be subject to an annual review that covers a 12-month period. This process allows for a timelier review than may otherwise occur between base rate cases. It also provides the opportunity for an audit focused specifically on the Companies' vegetation management expenses, as opposed to being included as part of a broader review of all costs in a base rate case, which could result in administrative benefits. Furthermore, Rider VMC would ensure that customers are only paying actual vegetation management expenses incurred, including providing timely credits in the event that actual expenses are lower than the applicable baseline amounts. Rider VMC will help ensure that recovery of the Companies' vegetation management expenses better aligns with the work being done and the service benefits realized.

VIII. CONCLUSION

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes. I reserve the right to supplement my testimony.

RIDER ELR
Economic Load Response Program Rider

APPLICABILITY:

This Economic Load Response Program Rider ("Program") is available to customers taking service from the Company at primary voltages or higher voltages provided that all of the following ~~seven~~ four conditions are met at the time of initiation of service to the customer under this Rider and on a continuing basis thereafter: (i) the customer took service under the Program as of May 31, 2024~~2016 or the customer was historically eligible for Rider ELR and provided written notice of intent to participate in the Program on or before May 31, 2015 for up to an additional 136,250 kW of Curtailable Load effective on or after June 1, 2016~~; (ii) the customer can successfully demonstrate to the Company that it is participating in a demand response program offered by PJM Interconnection, L.L.C. ("PJM");~~can reduce its measured load to a pre-established contract Firm Load (as defined under Other Provisions, paragraph A., below) within two hours of notification provided by the Company without the need of a generator (A customer may intend to use a generator to reduce its usage to below its Firm Load, but if the generator does not operate, the customer must still reduce its usage to or below its Firm Load. Failure of a customer to reduce its usage to or below its Firm Load shall result in the consequences listed in the Emergency Curtailment Event Section herein.);~~ (iii) the customer executes the Company's standard Program contract; (iv) the customer is taking generation service from the Company or a Competitive Retail Electric Service ("CRES") provider using consolidated billing; ~~(v) the customer is not participating in any other load curtailment or demand response program, including without limitation a demand response program offered by PJM Interconnection, L.L.C. ("PJM") or any other independent system operator; (vi) the customer commits its demand response capability to Company for integration into Company's R.C. § 4928.66 compliance programs; and, (vii) the Commission finds that the demand response capabilities of customers electing service under this rider shall count towards the Company's compliance with the peak demand reduction benchmarks set forth in R.C. § 4928.66 as applied by the Commission's applicable rules and regulations and shall be considered incremental to interruptible load on the Company's system that existed in 2008.~~ Nothing herein shall preclude a customer from requesting and receiving an exemption from any mechanism designed to recover the cost of energy efficiency and peak demand reduction programs to the extent the exemption is requested to reasonably encourage the commitment of customer-sited capabilities to the Company.

RATES:

In addition to any other charges under any other rate schedules applicable to customer's service, customers participating in the Program shall also pay the charges and receive the credit set forth below:

Charges:

Program Administrative Charge: $150.00 per month

ECE Charge:

During an Emergency Curtailment Event (as defined under Other Provisions, paragraph D., below), the portion of the customer's actual measured load that exceeds its pre-established contract Firm Load for any and all hours during such event shall be assessed an ECE Charge which is calculated for each hour of the event as follows. Revenue collected by the Company

RIDER ELR
Economic Load Response Program Rider

as a result of any ECE Charge less amounts associated with the Commercial Activity Tax ("CAT") (as defined below) shall be credited towards costs to be collected through the DSE1 charge of Rider DSE:

RIDER ELR
Economic Load Response Program Rider

ECE Charge = (AL x PJM LMP x 300%) x (1 + LAF) x ([1/(1-CAT)])

Where:

AL = the customer's actual hourly load during an Emergency Curtailment Event that exceeds the customer's pre-established contract Firm Load.

PJM LMP = the final Real-Time Locational Marginal Price as defined and specified by PJM at the appropriate pricing node during the applicable hour(s).

CAT = the Commercial Activity Tax rate as established in Section 5751.03 of the Ohio Revised Code.

LAF = Loss Adjustment Factor
3.0% for primary voltages
0.1% for subtransmission voltages
0.0% for transmission voltages

Program Credit ("PC"):

Customers taking service under this Rider shall receive a monthly Program Credit which shall be calculated as follows:

PC = CL x ($5.00) /kW/month

Where:

CL is the Curtailable Load, which shall be calculated by the Company for each customer by subtracting the customer's contract Firm Load registered with PJM ~~-~~from its monthly highest thirty (30) minute integrated kW load occurring during the non-holiday weekday hours of 11 a.m. to 5 p.m. Eastern Standard Time (equivalent to noon to 6 p.m. EDT). In no circumstance can the CL be negative nor can the CL be in excess of a contract amount determined based upon the customers 12 month history as of February 1, 2008. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

RIDER ELR
Economic Load Response Program Rider

Minimum Bill:

The application of the Program Credit shall not produce a total monthly bill for any customer, after including the effects of all rate schedules, riders, and if applicable, the CRES consolidated billing, that results in an average price per kWh less than two (2) cents per kWh.

OTHER PROVISIONS:

A. Firm Load

For purposes of this Rider, "Firm Load" shall be that portion of a customer's electric load that is not subject to curtailment and shall be equal to the level registered for participation in PJM demand response programs.~~.~~ ~~A customer may request a reduction to its contract Firm Load no more than once in any twelve month period. The Firm Load may be reduced to the extent that such reduction is consistent with other terms and conditions set forth in this Rider. Any such change in Firm Load shall be applied beginning with the customer's January bill immediately following the year in which the change has been approved by the Company, provided that advance written request is provided to the Company no less than thirty (30) days prior to the effective billing month of the change. The Company may increase the Firm Load at any time if the Company, at its sole discretion, determines the Firm Load is at a level that the customer fails to demonstrate that they can reach. The Company shall promptly notify the customer of any such change.~~

B. Load Response Program Contract

Customers taking service under this optional Rider shall execute the Company's standard Program contract which, among other things, will confirm the Customer's participation in a demand response program offered by PJM and establish the Customer's Firm Load as described above~~and commit the Customer's demand response capability to Company for purposes of Company's compliance with the peak demand reduction benchmarks set forth in R.C. § 4928.66 as applied by the Commission's applicable rules and regulations~~.

C. Metering

The customer must arrange for interval metering consistent with the Company's Miscellaneous Charges, Tariff Sheet 75.

RIDER ELR
Economic Load Response Program Rider

D. Emergency Curtailment Event

Upon advance notification provided by the Company, a customer taking service under this Rider must curtail all load above its Firm Load during an Emergency Curtailment Event consistent with the Company's instructions. For purposes of this Rider, an Emergency Curtailment Event shall be one in which the Company~~, a regional transmission organization and/or a transmission operator~~ determines, in its ~~respective~~ sole discretion, that an emergency situation exists that may jeopardize the integrity of ~~either~~ the distribution ~~or transmission~~ system in the area. ~~PJM, which is the regional transmission organization of which the Company is a member, may also initiate an Emergency Curtailment Event upon their sole determination that a pre-emergency situation exists.~~

If an Emergency Curtailment Event is requested solely by the Company ~~or a transmission operator~~, a customer will be given no less two hours advance notification to curtail all load above its Firm Load during the Emergency Curtailment Event. An Emergency Curtailment Event requested solely by the Company ~~or a transmission operator~~ may occur anytime during the year with no restrictions on the number of events or the duration of an event.

~~If the Emergency Curtailment Event is requested by PJM, a customer will be notified by the Company of the start time of the Emergency Curtailment Event as determined by PJM. The start time of the Emergency Curtailment Event will be approximately thirty (30) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. However, PJM at its sole discretion may grant a customer an exception to the thirty (30) minute advance notification time of either sixty (60) minutes or one hundred and twenty (120) minutes based on the customer's physical capability to provide load reduction. A customer wishing to seek such exception must submit to the Company a completed request form that the Company will then submit to PJM. If PJM approves the customer request for an exception for sixty (60) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately sixty (60) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. If PJM approves the customer request for an exception for one hundred and twenty (120) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately one hundred and twenty (120) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. The maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM during the months of May through October will be twelve (12) hours and will only occur between 10:00 AM to 10:00 PM (Eastern Prevailing Time). For the months of November through April, the maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM will be fifteen (15) hours and will only occur between 6:00 AM to 9:00 PM (Eastern Prevailing Time). An Emergency Curtailment Event requested solely by PJM may occur any day during the year with no restrictions on the number of events that could occur.~~

RIDER ELR
Economic Load Response Program Rider

During the entire period of an Emergency Curtailment Event, the customer's actual measured load must remain at or below its Firm Load with such load being measured every clock half hour. A customer's actual measured load shall be determined using the greater of the customer's highest lagging kVA or highest kW during the Emergency Curtailment Event.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds its contract Firm Load, the Company may disconnect the customer ~~from the transmission system~~ for the duration of the Emergency Curtailment Event, at the customer's expense. The Company shall not be liable for any direct or indirect costs, losses, expenses, or other damages, special or otherwise, including, without limitation, lost profits that arise from such disconnection.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds ~~110% of~~ its Firm Load, the customer shall (i) be required ~~subject~~ to ~~all four (4) of the following: (i)~~ forfeit all its Program Credits received under this Rider and the Economic Development Rider Interruptible Credit Provision ~~for~~ during the current month in which the Emergency Curtailment Event occurred~~;~~ and the preceding twelve months associated with the uninterrupted demand and (ii) pay the ECE Charge set forth in the Rates section of this Rider. The uninterrupted demand will be calculated as the difference between the maximum 30-minute actual measured load during the Emergency Curtailment Event and the Firm Load.~~; (iii) pay the sum of all Program Credits received by the customer under the Program during the immediately preceding twelve billing months which shall include credits from this Rider and the Economic Development Rider; and (iv)~~ T~~t~~he Company~~'s~~ also has the right, at its sole discretion, to remove the customer from the Program for a minimum of 12 months.

~~If at any time during the Emergency Curtailment Event a customer's actual measured load is greater than 100% and less than or equal to 110% of its Firm Load during the Emergency Curtailment Event, the customer shall forfeit its Program Credit for the month in which the Emergency Curtailment Event occurred and shall pay the ECE Charge set forth in the Rates section of this Rider.~~

~~In no event shall the penalties for non-performance listed above be less than PJM's non-performance penalties plus ECE charge for a non-performing customer during the Emergency Curtailment Event.~~

~~In a PJM delivery year (June 1st – May 31st) when an Emergency Curtailment Event has not been requested of customers by PJM on this Rider between June 1 and May 7, the Company shall simultaneously interrupt all customers on this Rider by May 31 in order to meet the Company's PJM test obligations for Load Management Resources. The duration of this test will be one hour. The Company will schedule the test and Customers shall receive advance notification of the test. All provisions of this Rider shall apply to this test.~~

In the event of any conflict between the terms and conditions set forth in this Rider and other service reliability requirements and/or obligations of the Company, the latter shall prevail.

RIDER ELR
Economic Load Response Program Rider

E. Notification

~~Emergency Curtailment Event notifications called by PJM will be stated such that customers must curtail their actual measured load to Firm Load prior to the start time of the Emergency Curtailment Event set forth in the PJM notification to the Company.~~ Emergency Curtailment Event notifications called ~~for either~~ by the Company ~~or a transmission operator~~ will be stated such that customers must curtail actual measured load to Firm Load within two hours of the time the Company sends such notification to the customer. The Company will provide customers a notification of when Emergency Curtailment Events have ended. Receipt of notifications set out in this paragraph shall be the sole responsibility of the customer.

Notification of an Emergency Curtailment Event consists of an electronic message issued by the Company to a device or devices such as telephone, text, facsimile, pager or email, selected and provided by the customer and approved by the Company. Two-way information capability shall be incorporated by the Company and the customer in order to provide confirmation of receipt of notification messages. Operation, maintenance and functionality of such communication devices selected by the customer shall be the sole responsibility of the customer.

F. Term

This Rider shall become effective for service rendered beginning June 1, 20~~16~~24, and shall expire with service rendered through May 31, 2032~~2024~~.

~~A customer may terminate its participation in the Program consistent with other terms and conditions to be effective June 1st, so long as the customer provides written notice to the Company no less than 38 months prior to the requested June 1st date upon which the requested termination would become effective. Except as otherwise provided in this Rider, a qualifying customer may return to the Program after a hiatus from the Program of at least one (1) year on the first day of the customer's billing cycle upon at least thirty days prior written notice of the customer's intent to return.~~

G. Conditions

Payment by the customer of all charges herein is a condition of service under this Economic Load Response Program Rider.

RIDER ELR
Economic Load Response Program Rider

APPLICABILITY:

This Economic Load Response Program Rider ("Program") is available to customers taking service from the Company at primary voltages or higher voltages provided that all of the following ~~seven~~ four conditions are met at the time of initiation of service to the customer under this Rider and on a continuing basis thereafter: (i) the customer took service under the Program as of May 31, 2024~~2016 or the customer was historically eligible for Rider ELR and provided written notice of intent to participate in the Program on or before May 31, 2015 for up to an additional 136,250 kW of Curtailable Load effective on or after June 1, 2016~~; (ii) the customer can successfully demonstrate to the Company that it is participating in a demand response program offered by PJM Interconnection, L.L.C. ("PJM");~~can reduce its measured load to a pre-established contract Firm Load (as defined under Other Provisions, paragraph A., below) within two hours of notification provided by the Company without the need of a generator (A customer may intend to use a generator to reduce its usage to below its Firm Load, but if the generator does not operate, the customer must still reduce its usage to or below its Firm Load. Failure of a customer to reduce its usage to or below its Firm Load shall result in the consequences listed in the Emergency Curtailment Event Section herein.);~~ (iii) the customer executes the Company's standard Program contract; (iv) the customer is taking generation service from the Company or a Competitive Retail Electric Service ("CRES") provider using consolidated billing; ~~(v) the customer is not participating in any other load curtailment or demand response program, including without limitation a demand response program offered by PJM Interconnection, L.L.C. ("PJM") or any other independent system operator; (vi) the customer commits its demand response capability to Company for integration into Company's R.C. § 4928.66 compliance programs; and, (vii) the Commission finds that the demand response capabilities of customers electing service under this rider shall count towards the Company's compliance with the peak demand reduction benchmarks set forth in R.C. § 4928.66 as applied by the Commission's applicable rules and regulations and shall be considered incremental to interruptible load on the Company's system that existed in 2008.~~ Nothing herein shall preclude a customer from requesting and receiving an exemption from any mechanism designed to recover the cost of energy efficiency and peak demand reduction programs to the extent the exemption is requested to reasonably encourage the commitment of customer-sited capabilities to the Company.

RATES:

In addition to any other charges under any other rate schedules applicable to customer's service, customers participating in the Program shall also pay the charges and receive the credit set forth below:

Charges:

Program Administrative Charge: $150.00 per month

ECE Charge:

During an Emergency Curtailment Event (as defined under Other Provisions, paragraph D., below), the portion of the customer's actual measured load that exceeds its pre-established contract Firm Load for any and all hours during such event shall be assessed an ECE Charge which is calculated for each hour of the event as follows. Revenue collected by the Company

RIDER ELR
Economic Load Response Program Rider

as a result of any ECE Charge less amounts associated with the Commercial Activity Tax ("CAT") (as defined below) shall be credited towards costs to be collected through the DSE1 charge of Rider DSE:

RIDER ELR
Economic Load Response Program Rider

ECE Charge = (AL x PJM LMP x 300%) x (1 + LAF) x ([1/(1-CAT)])

Where:

AL = the customer's actual hourly load during an Emergency Curtailment Event that exceeds the customer's pre-established contract Firm Load.

PJM LMP = the final Real-Time Locational Marginal Price as defined and specified by PJM at the appropriate pricing node during the applicable hour(s).

CAT = the Commercial Activity Tax rate as established in Section 5751.03 of the Ohio Revised Code.

LAF = Loss Adjustment Factor
3.0% for primary voltages
0.1% for subtransmission voltages
0.0% for transmission voltages

Program Credit ("PC"):

Customers taking service under this Rider shall receive a monthly Program Credit which shall be calculated as follows:

PC = CL x ($5.00) /kW/month

Where:

CL is the Curtailable Load, which shall be calculated by the Company for each customer by subtracting the customer's contract Firm Load registered with PJM ~~-~~from its monthly highest thirty (30) minute integrated kW load occurring during the non-holiday weekday hours of 11 a.m. to 5 p.m. Eastern Standard Time (equivalent to noon to 6 p.m. EDT). In no circumstance can the CL be negative nor can the CL be in excess of a contract amount determined based upon the customers 12 month history as of February 1, 2008. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

RIDER ELR
Economic Load Response Program Rider

Minimum Bill:

The application of the Program Credit shall not produce a total monthly bill for any customer, after including the effects of all rate schedules, riders, and if applicable, the CRES consolidated billing, that results in an average price per kWh less than two (2) cents per kWh.

OTHER PROVISIONS:

A. Firm Load

For purposes of this Rider, "Firm Load" shall be that portion of a customer's electric load that is not subject to curtailment and shall be equal to the level registered for participation in PJM demand response programs.~~.~~ ~~A customer may request a reduction to its contract Firm Load no more than once in any twelve month period. The Firm Load may be reduced to the extent that such reduction is consistent with other terms and conditions set forth in this Rider. Any such change in Firm Load shall be applied beginning with the customer's January bill immediately following the year in which the change has been approved by the Company, provided that advance written request is provided to the Company no less than thirty (30) days prior to the effective billing month of the change. The Company may increase the Firm Load at any time if the Company, at its sole discretion, determines the Firm Load is at a level that the customer fails to demonstrate that they can reach. The Company shall promptly notify the customer of any such change.~~

B. Load Response Program Contract

Customers taking service under this optional Rider shall execute the Company's standard Program contract which, among other things, will confirm the Customer's participation in a demand response program offered by PJM and establish the Customer's Firm Load as described above~~and commit the Customer's demand response capability to Company for purposes of Company's compliance with the peak demand reduction benchmarks set forth in R.C. § 4928.66 as applied by the Commission's applicable rules and regulations~~.

C. Metering

The customer must arrange for interval metering consistent with the Company's Miscellaneous Charges, Tariff Sheet 75.

RIDER ELR
Economic Load Response Program Rider

D. Emergency Curtailment Event

Upon advance notification provided by the Company, a customer taking service under this Rider must curtail all load above its Firm Load during an Emergency Curtailment Event consistent with the Company's instructions. For purposes of this Rider, an Emergency Curtailment Event shall be one in which the Company~~, a regional transmission organization and/or a transmission operator~~ determines, in its ~~respective~~ sole discretion, that an emergency situation exists that may jeopardize the integrity of ~~either~~ the distribution ~~or transmission~~ system in the area. ~~PJM, which is the regional transmission organization of which the Company is a member, may also initiate an Emergency Curtailment Event upon their sole determination that a pre-emergency situation exists.~~

If an Emergency Curtailment Event is requested solely by the Company ~~or a transmission operator~~, a customer will be given no less two hours advance notification to curtail all load above its Firm Load during the Emergency Curtailment Event. An Emergency Curtailment Event requested solely by the Company ~~or a transmission operator~~ may occur anytime during the year with no restrictions on the number of events or the duration of an event.

~~If the Emergency Curtailment Event is requested by PJM, a customer will be notified by the Company of the start time of the Emergency Curtailment Event as determined by PJM. The start time of the Emergency Curtailment Event will be approximately thirty (30) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. However, PJM at its sole discretion may grant a customer an exception to the thirty (30) minute advance notification time of either sixty (60) minutes or one hundred and twenty (120) minutes based on the customer's physical capability to provide load reduction. A customer wishing to seek such exception must submit to the Company a completed request form that the Company will then submit to PJM. If PJM approves the customer request for an exception for sixty (60) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately sixty (60) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. If PJM approves the customer request for an exception for one hundred and twenty (120) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately one hundred and twenty (120) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. The maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM during the months of May through October will be twelve (12) hours and will only occur between 10:00 AM to 10:00 PM (Eastern Prevailing Time). For the months of November through April, the maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM will be fifteen (15) hours and will only occur between 6:00 AM to 9:00 PM (Eastern Prevailing Time). An Emergency Curtailment Event requested solely by PJM may occur any day during the year with no restrictions on the number of events that could occur.~~

RIDER ELR
Economic Load Response Program Rider

During the entire period of an Emergency Curtailment Event, the customer's actual measured load must remain at or below its Firm Load with such load being measured every clock half hour. A customer's actual measured load shall be determined using the greater of the customer's highest lagging kVA or highest kW during the Emergency Curtailment Event.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds its contract Firm Load, the Company may disconnect the customer ~~from the transmission system~~ for the duration of the Emergency Curtailment Event, at the customer's expense. The Company shall not be liable for any direct or indirect costs, losses, expenses, or other damages, special or otherwise, including, without limitation, lost profits that arise from such disconnection.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds ~~110% of~~ its Firm Load, the customer shall (i) be required ~~subject~~ to ~~all four (4) of the following: (i)~~ forfeit all its Program Credits received under this Rider and the Economic Development Rider Interruptible Credit Provision ~~for~~ during the current month in which the Emergency Curtailment Event occurred~~;~~ and the preceding twelve months associated with the uninterrupted demand and (ii) pay the ECE Charge set forth in the Rates section of this Rider. The uninterrupted demand will be calculated as the difference between the maximum 30-minute actual measured load during the Emergency Curtailment Event and the Firm Load.~~; (iii) pay the sum of all Program Credits received by the customer under the Program during the immediately preceding twelve billing months which shall include credits from this Rider and the Economic Development Rider; and (iv)~~ T~~t~~he Company~~'s~~ also has the right, at its sole discretion, to remove the customer from the Program for a minimum of 12 months.

~~If at any time during the Emergency Curtailment Event a customer's actual measured load is greater than 100% and less than or equal to 110% of its Firm Load during the Emergency Curtailment Event, the customer shall forfeit its Program Credit for the month in which the Emergency Curtailment Event occurred and shall pay the ECE Charge set forth in the Rates section of this Rider.~~

~~In no event shall the penalties for non-performance listed above be less than PJM's non-performance penalties plus ECE charge for a non-performing customer during the Emergency Curtailment Event.~~

~~In a PJM delivery year (June 1st – May 31st) when an Emergency Curtailment Event has not been requested of customers by PJM on this Rider between June 1 and May 7, the Company shall simultaneously interrupt all customers on this Rider by May 31 in order to meet the Company's PJM test obligations for Load Management Resources. The duration of this test will be one hour. The Company will schedule the test and Customers shall receive advance notification of the test. All provisions of this Rider shall apply to this test.~~

In the event of any conflict between the terms and conditions set forth in this Rider and other service reliability requirements and/or obligations of the Company, the latter shall prevail.

RIDER ELR
Economic Load Response Program Rider

E. Notification

~~Emergency Curtailment Event notifications called by PJM will be stated such that customers must curtail their actual measured load to Firm Load prior to the start time of the Emergency Curtailment Event set forth in the PJM notification to the Company.~~ Emergency Curtailment Event notifications called ~~for either~~ by the Company ~~or a transmission operator~~ will be stated such that customers must curtail actual measured load to Firm Load within two hours of the time the Company sends such notification to the customer. The Company will provide customers a notification of when Emergency Curtailment Events have ended. Receipt of notifications set out in this paragraph shall be the sole responsibility of the customer.

Notification of an Emergency Curtailment Event consists of an electronic message issued by the Company to a device or devices such as telephone, text, facsimile, pager or email, selected and provided by the customer and approved by the Company. Two-way information capability shall be incorporated by the Company and the customer in order to provide confirmation of receipt of notification messages. Operation, maintenance and functionality of such communication devices selected by the customer shall be the sole responsibility of the customer.

F. Term

This Rider shall become effective for service rendered beginning June 1, 20~~16~~24, and shall expire with service rendered through May 31, 2032~~2024~~.

~~A customer may terminate its participation in the Program consistent with other terms and conditions to be effective June 1st, so long as the customer provides written notice to the Company no less than 38 months prior to the requested June 1st date upon which the requested termination would become effective. Except as otherwise provided in this Rider, a qualifying customer may return to the Program after a hiatus from the Program of at least one (1) year on the first day of the customer's billing cycle upon at least thirty days prior written notice of the customer's intent to return.~~

G. Conditions

Payment by the customer of all charges herein is a condition of service under this Economic Load Response Program Rider.

RIDER ELR
Economic Load Response Program Rider

APPLICABILITY:

This Economic Load Response Program Rider ("Program") is available to customers taking service from the Company at primary voltages or higher voltages provided that all of the following ~~seven~~ four conditions are met at the time of initiation of service to the customer under this Rider and on a continuing basis thereafter: (i) the customer took service under the Program as of May 31, 2024~~2016 or the customer was historically eligible for Rider ELR and provided written notice of intent to participate in the Program on or before May 31, 2015 for up to an additional 136,250 kW of Curtailable Load effective on or after June 1, 2016~~; (ii) the customer can successfully demonstrate to the Company that it is participating in a demand response program offered by PJM Interconnection, L.L.C. ("PJM");~~can reduce its measured load to a pre-established contract Firm Load (as defined under Other Provisions, paragraph A., below) within two hours of notification provided by the Company without the need of a generator (A customer may intend to use a generator to reduce its usage to below its Firm Load, but if the generator does not operate, the customer must still reduce its usage to or below its Firm Load. Failure of a customer to reduce its usage to or below its Firm Load shall result in the consequences listed in the Emergency Curtailment Event Section herein.);~~ (iii) the customer executes the Company's standard Program contract; (iv) the customer is taking generation service from the Company or a Competitive Retail Electric Service ("CRES") provider using consolidated billing; ~~(v) the customer is not participating in any other load curtailment or demand response program, including without limitation a demand response program offered by PJM Interconnection, L.L.C. ("PJM") or any other independent system operator; (vi) the customer commits its demand response capability to Company for integration into Company's R.C. § 4928.66 compliance programs; and, (vii) the Commission finds that the demand response capabilities of customers electing service under this rider shall count towards the Company's compliance with the peak demand reduction benchmarks set forth in R.C. § 4928.66 as applied by the Commission's applicable rules and regulations and shall be considered incremental to interruptible load on the Company's system that existed in 2008.~~ Nothing herein shall preclude a customer from requesting and receiving an exemption from any mechanism designed to recover the cost of energy efficiency and peak demand reduction programs to the extent the exemption is requested to reasonably encourage the commitment of customer-sited capabilities to the Company.

RATES:

In addition to any other charges under any other rate schedules applicable to customer's service, customers participating in the Program shall also pay the charges and receive the credit set forth below:

Charges:

Program Administrative Charge: $150.00 per month

ECE Charge:

During an Emergency Curtailment Event (as defined under Other Provisions, paragraph D., below), the portion of the customer's actual measured load that exceeds its pre-established contract Firm Load for any and all hours during such event shall be assessed an ECE Charge which is calculated for each hour of the event as follows. Revenue collected by the Company

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as a result of any ECE Charge less amounts associated with the Commercial Activity Tax ("CAT") (as defined below) shall be credited towards costs to be collected through the DSE1 charge of Rider DSE:

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ECE Charge = (AL x PJM LMP x 300%) x (1 + LAF) x ([1/(1-CAT)])

Where:

AL = the customer's actual hourly load during an Emergency Curtailment Event that exceeds the customer's pre-established contract Firm Load.

PJM LMP = the final Real-Time Locational Marginal Price as defined and specified by PJM at the appropriate pricing node during the applicable hour(s).

CAT = the Commercial Activity Tax rate as established in Section 5751.03 of the Ohio Revised Code.

LAF = Loss Adjustment Factor
3.0% for primary voltages
0.1% for subtransmission voltages
0.0% for transmission voltages

Program Credit ("PC"):

Customers taking service under this Rider shall receive a monthly Program Credit which shall be calculated as follows:

PC = CL x ($5.00) /kW/month

Where:

CL is the Curtailable Load, which shall be calculated by the Company for each customer by subtracting the customer's contract Firm Load registered with PJM ~~-~~from its monthly highest thirty (30) minute integrated kW load occurring during the non-holiday weekday hours of 11 a.m. to 5 p.m. Eastern Standard Time (equivalent to noon to 6 p.m. EDT). In no circumstance can the CL be negative nor can the CL be in excess of a contract amount determined based upon the customers 12 month history as of February 1, 2008. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

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Minimum Bill:

The application of the Program Credit shall not produce a total monthly bill for any customer, after including the effects of all rate schedules, riders, and if applicable, the CRES consolidated billing, that results in an average price per kWh less than two (2) cents per kWh.

OTHER PROVISIONS:

A. Firm Load

For purposes of this Rider, "Firm Load" shall be that portion of a customer's electric load that is not subject to curtailment and shall be equal to the level registered for participation in PJM demand response programs.~~.~~ ~~A customer may request a reduction to its contract Firm Load no more than once in any twelve month period. The Firm Load may be reduced to the extent that such reduction is consistent with other terms and conditions set forth in this Rider. Any such change in Firm Load shall be applied beginning with the customer's January bill immediately following the year in which the change has been approved by the Company, provided that advance written request is provided to the Company no less than thirty (30) days prior to the effective billing month of the change. The Company may increase the Firm Load at any time if the Company, at its sole discretion, determines the Firm Load is at a level that the customer fails to demonstrate that they can reach. The Company shall promptly notify the customer of any such change.~~

B. Load Response Program Contract

Customers taking service under this optional Rider shall execute the Company's standard Program contract which, among other things, will confirm the Customer's participation in a demand response program offered by PJM and establish the Customer's Firm Load as described above~~and commit the Customer's demand response capability to Company for purposes of Company's compliance with the peak demand reduction benchmarks set forth in R.C. § 4928.66 as applied by the Commission's applicable rules and regulations~~.

C. Metering

The customer must arrange for interval metering consistent with the Company's Miscellaneous Charges, Tariff Sheet 75.

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D. Emergency Curtailment Event

Upon advance notification provided by the Company, a customer taking service under this Rider must curtail all load above its Firm Load during an Emergency Curtailment Event consistent with the Company's instructions. For purposes of this Rider, an Emergency Curtailment Event shall be one in which the Company~~, a regional transmission organization and/or a transmission operator~~ determines, in its ~~respective~~ sole discretion, that an emergency situation exists that may jeopardize the integrity of ~~either~~ the distribution ~~or transmission~~ system in the area. ~~PJM, which is the regional transmission organization of which the Company is a member, may also initiate an Emergency Curtailment Event upon their sole determination that a pre-emergency situation exists.~~

If an Emergency Curtailment Event is requested solely by the Company ~~or a transmission operator~~, a customer will be given no less two hours advance notification to curtail all load above its Firm Load during the Emergency Curtailment Event. An Emergency Curtailment Event requested solely by the Company ~~or a transmission operator~~ may occur anytime during the year with no restrictions on the number of events or the duration of an event.

~~If the Emergency Curtailment Event is requested by PJM, a customer will be notified by the Company of the start time of the Emergency Curtailment Event as determined by PJM. The start time of the Emergency Curtailment Event will be approximately thirty (30) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. However, PJM at its sole discretion may grant a customer an exception to the thirty (30) minute advance notification time of either sixty (60) minutes or one hundred and twenty (120) minutes based on the customer's physical capability to provide load reduction. A customer wishing to seek such exception must submit to the Company a completed request form that the Company will then submit to PJM. If PJM approves the customer request for an exception for sixty (60) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately sixty (60) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. If PJM approves the customer request for an exception for one hundred and twenty (120) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately one hundred and twenty (120) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. The maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM during the months of May through October will be twelve (12) hours and will only occur between 10:00 AM to 10:00 PM (Eastern Prevailing Time). For the months of November through April, the maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM will be fifteen (15) hours and will only occur between 6:00 AM to 9:00 PM (Eastern Prevailing Time). An Emergency Curtailment Event requested solely by PJM may occur any day during the year with no restrictions on the number of events that could occur.~~

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During the entire period of an Emergency Curtailment Event, the customer's actual measured load must remain at or below its Firm Load with such load being measured every clock half hour. A customer's actual measured load shall be determined using the greater of the customer's highest lagging kVA or highest kW during the Emergency Curtailment Event.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds its contract Firm Load, the Company may disconnect the customer ~~from the transmission system~~ for the duration of the Emergency Curtailment Event, at the customer's expense. The Company shall not be liable for any direct or indirect costs, losses, expenses, or other damages, special or otherwise, including, without limitation, lost profits that arise from such disconnection.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds~~ 110% of~~ its Firm Load, the customer shall (i) be required ~~subject~~ to ~~all four (4) of the following: (i)~~ forfeit all its Program Credits received under this Rider and the Economic Development Rider Interruptible Credit Provision ~~for~~ during the current month in which the Emergency Curtailment Event occurred~~;~~ and the preceding twelve months associated with the uninterrupted demand and (ii) pay the ECE Charge set forth in the Rates section of this Rider. The uninterrupted demand will be calculated as the difference between the maximum 30-minute actual measured load during the Emergency Curtailment Event and the Firm Load.~~; (iii) pay the sum of all Program Credits received by the customer under the Program during the immediately preceding twelve billing months which shall include credits from this Rider and the Economic Development Rider; and (iv)~~ T~~t~~he Company~~'s~~ also has the right, at its sole discretion, to remove the customer from the Program for a minimum of 12 months.

~~If at any time during the Emergency Curtailment Event a customer's actual measured load is greater than 100% and less than or equal to 110% of its Firm Load during the Emergency Curtailment Event, the customer shall forfeit its Program Credit for the month in which the Emergency Curtailment Event occurred and shall pay the ECE Charge set forth in the Rates section of this Rider.~~

~~In no event shall the penalties for non-performance listed above be less than PJM's non-performance penalties plus ECE charge for a non-performing customer during the Emergency Curtailment Event.~~

~~In a PJM delivery year (June 1st – May 31st) when an Emergency Curtailment Event has not been requested of customers by PJM on this Rider between June 1 and May 7, the Company shall simultaneously interrupt all customers on this Rider by May 31 in order to meet the Company's PJM test obligations for Load Management Resources. The duration of this test will be one hour. The Company will schedule the test and Customers shall receive advance notification of the test. All provisions of this Rider shall apply to this test.~~

In the event of any conflict between the terms and conditions set forth in this Rider and other service reliability requirements and/or obligations of the Company, the latter shall prevail.

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E. Notification

~~Emergency Curtailment Event notifications called by PJM will be stated such that customers must curtail their actual measured load to Firm Load prior to the start time of the Emergency Curtailment Event set forth in the PJM notification to the Company.~~ Emergency Curtailment Event notifications called ~~for either~~ by the Company ~~or a transmission operator~~ will be stated such that customers must curtail actual measured load to Firm Load within two hours of the time the Company sends such notification to the customer. The Company will provide customers a notification of when Emergency Curtailment Events have ended. Receipt of notifications set out in this paragraph shall be the sole responsibility of the customer.

Notification of an Emergency Curtailment Event consists of an electronic message issued by the Company to a device or devices such as telephone, text, facsimile, pager or email, selected and provided by the customer and approved by the Company. Two-way information capability shall be incorporated by the Company and the customer in order to provide confirmation of receipt of notification messages. Operation, maintenance and functionality of such communication devices selected by the customer shall be the sole responsibility of the customer.

F. Term

This Rider shall become effective for service rendered beginning June 1, 20~~16~~24, and shall expire with service rendered through May 31, 2032~~2024~~.

~~A customer may terminate its participation in the Program consistent with other terms and conditions to be effective June 1st, so long as the customer provides written notice to the Company no less than 38 months prior to the requested June 1st date upon which the requested termination would become effective. Except as otherwise provided in this Rider, a qualifying customer may return to the Program after a hiatus from the Program of at least one (1) year on the first day of the customer's billing cycle upon at least thirty days prior written notice of the customer's intent to return.~~

G. Conditions

Payment by the customer of all charges herein is a condition of service under this Economic Load Response Program Rider.

Energy Efficiency Cost Recovery Rider
Rate Design
Estimated June 1, 2024 - May 31, 2025

		OE	CEI	TE	Total	Notes
(1)	**Residential**					
(2)	Residential EE Cost	$ 2,912,542	$ 1,742,402	$ 782,932	$ 5,437,876	Source: Current Company forecast
(3)	Prior Period Reconciliation				$ -	Source: Company records
(4)	Revenue Requirement	$ 2,912,542	$ 1,742,402	$ 782,932	$ 5,437,876	Line 2 + Line 3
(5)						
(6)	Revenue Requirement w/ CAT	**$ 2,920,135**	**$ 1,746,944**	**$ 784,973**	**$ 5,452,052**	Line 4 / (1 - CAT)
(7)						
(8)	**Non-Residential**					
(9)	Non-Residential EE Cost	$ 2,476,933	$ 2,227,979	$ 1,549,195	$ 6,254,108	Source: Current Company forecast
(10)	Prior Period Reconciliation				$ -	Source: Company records
(11)	Revenue Requirement	$ 2,476,933	$ 2,227,979	$ 1,549,195	$ 6,254,108	Line 9 + Line 10
(12)						
(13)	Revenue Requirement w/ CAT	**$ 2,483,390**	**$ 2,233,787**	**$ 1,553,234**	**$ 6,270,411**	Line 11 / (1 - CAT)
(14)						
(15)	**Annual MWh Sales**	**OE**	**CEI**	**TE**		
(16)	Residential	9,414,711	5,632,264	2,530,806		Source: Current Company forecast
(17)	Non-Residential	14,006,605	12,598,815	8,760,416		Source: Current Company forecast
(18)						
(19)	**Rate ($/kWh)**	**OE**	**CEI**	**TE**		
(20)	Residential	$ 0.000310	$ 0.000310	$ 0.000310		Line 6 / (Line 16 x 1000)
(21)	Non-Residential	$ 0.000177	$ 0.000177	$ 0.000177		Line 13 / (Line 17 x 1000)

OE - Residential

			8			8.48%			
Year	Beg. Bal.	Spend	Amort	Activity	End. Bal.	Return	Revenue	**MWh**	**$/kWh**
1	$ -	$ 17,967,566	$ 2,245,946	$ 15,721,620	$ 15,721,620	$ 666,597	$ 2,912,542	9,414,711	$0.000310
2	$ 15,721,620	$ 17,967,566	$ 4,491,891	$ 13,475,674	$ 29,197,294	$ 1,904,562	$ 6,396,453	9,414,711	$0.000681
3	$ 29,197,294	$ 17,967,566	$ 6,737,837	$ 11,229,729	$ 40,427,023	$ 2,952,071	$ 9,689,908	9,414,711	$0.001032
4	$ 40,427,023	$ 17,967,566	$ 8,983,783	$ 8,983,783	$ 49,410,806	$ 3,809,124	$ 12,792,907	9,414,711	$0.001362
5	$ 49,410,806	$ -	$ 8,983,783	$ (8,983,783)	$ 40,427,023	$ 3,809,124	$ 12,792,907	9,414,711	$0.001362
6	$ 40,427,023	$ -	$ 8,983,783	$ (8,983,783)	$ 31,443,240	$ 3,047,299	$ 12,031,082	9,414,711	$0.001281
7	$ 31,443,240	$ -	$ 8,983,783	$ (8,983,783)	$ 22,459,457	$ 2,285,474	$ 11,269,257	9,414,711	$0.001200
8	$ 22,459,457	$ -	$ 8,983,783	$ (8,983,783)	$ 13,475,674	$ 1,523,650	$ 10,507,432	9,414,711	$0.001119
9	$ 13,475,674	$ -	$ 6,737,837	$ (6,737,837)	$ 6,737,837	$ 857,053	$ 7,594,890	9,414,711	$0.000809
10	$ 6,737,837	$ -	$ 4,491,891	$ (4,491,891)	$ 2,245,946	$ 380,912	$ 4,872,804	9,414,711	$0.000519
11	$ 2,245,946	$ -	$ 2,245,946	$ (2,245,946)	$ -	$ 95,228	$ 2,341,174	9,414,711	$0.000249
		$ 71,870,263	$ 71,870,263	$ -		$ 21,331,094	$ 93,201,357		

OE - Non-Residential

			8			8.48%			
Year	Beg. Bal.	Spend	Amort	Activity	End. Bal.	Return	Revenue	**MWh**	**$/kWh**
1	$ -	$ 15,280,279	$ 1,910,035	$ 13,370,244	$ 13,370,244	$ 566,898	$ 2,476,933	14,006,605	$0.000177
2	$ 13,370,244	$ 15,280,279	$ 3,820,070	$ 11,460,209	$ 24,830,453	$ 1,619,710	$ 5,439,779	14,006,605	$0.000389
3	$ 24,830,453	$ 15,280,279	$ 5,730,105	$ 9,550,174	$ 34,380,628	$ 2,510,550	$ 8,240,655	14,006,605	$0.000590
4	$ 34,380,628	$ 15,280,279	$ 7,640,140	$ 7,640,140	$ 42,020,767	$ 3,239,419	$ 10,879,559	14,006,605	$0.000779
5	$ 42,020,767	$ -	$ 7,640,140	$ (7,640,140)	$ 34,380,628	$ 3,239,419	$ 10,879,559	14,006,605	$0.000779
6	$ 34,380,628	$ -	$ 7,640,140	$ (7,640,140)	$ 26,740,488	$ 2,591,535	$ 10,231,675	14,006,605	$0.000732
7	$ 26,740,488	$ -	$ 7,640,140	$ (7,640,140)	$ 19,100,349	$ 1,943,651	$ 9,583,791	14,006,605	$0.000686
8	$ 19,100,349	$ -	$ 7,640,140	$ (7,640,140)	$ 11,460,209	$ 1,295,768	$ 8,935,907	14,006,605	$0.000640
9	$ 11,460,209	$ -	$ 5,730,105	$ (5,730,105)	$ 5,730,105	$ 728,869	$ 6,458,974	14,006,605	$0.000462
10	$ 5,730,105	$ -	$ 3,820,070	$ (3,820,070)	$ 1,910,035	$ 323,942	$ 4,144,012	14,006,605	$0.000297
11	$ 1,910,035	$ -	$ 1,910,035	$ (1,910,035)	$ (0)	$ 80,985	$ 1,991,020	14,006,605	$0.000143
		$ 61,121,116	$ 61,121,116	$ (0)		$ 18,140,747	$ 79,261,864		

CEI - Residential

			8			8.48%			
Year	Beg. Bal.	Spend	Amort	Activity	End. Bal.	Return	Revenue	MWh	$/kWh
1	$ -	$ 10,748,931	$ 1,343,616	$ 9,405,315	$ 9,405,315	$ 398,785	$ 1,742,402	5,632,264	$0.000310
2	$ 9,405,315	$ 10,748,931	$ 2,687,233	$ 8,061,698	$ 17,467,013	$ 1,139,387	$ 3,826,619	5,632,264	$0.000681
3	$ 17,467,013	$ 10,748,931	$ 4,030,849	$ 6,718,082	$ 24,185,095	$ 1,766,049	$ 5,796,899	5,632,264	$0.001032
4	$ 24,185,095	$ 10,748,931	$ 5,374,466	$ 5,374,466	$ 29,559,560	$ 2,278,773	$ 7,653,239	5,632,264	$0.001362
5	$ 29,559,560	$ -	$ 5,374,466	$ (5,374,466)	$ 24,185,095	$ 2,278,773	$ 7,653,239	5,632,264	$0.001362
6	$ 24,185,095	$ -	$ 5,374,466	$ (5,374,466)	$ 18,810,629	$ 1,823,019	$ 7,197,484	5,632,264	$0.001281
7	$ 18,810,629	$ -	$ 5,374,466	$ (5,374,466)	$ 13,436,164	$ 1,367,264	$ 6,741,730	5,632,264	$0.001200
8	$ 13,436,164	$ -	$ 5,374,466	$ (5,374,466)	$ 8,061,698	$ 911,509	$ 6,285,975	5,632,264	$0.001119
9	$ 8,061,698	$ -	$ 4,030,849	$ (4,030,849)	$ 4,030,849	$ 512,724	$ 4,543,573	5,632,264	$0.000809
10	$ 4,030,849	$ -	$ 2,687,233	$ (2,687,233)	$ 1,343,616	$ 227,877	$ 2,915,110	5,632,264	$0.000519
11	$ 1,343,616	$ -	$ 1,343,616	$ (1,343,616)	$ -	$ 56,969	$ 1,400,586	5,632,264	$0.000249
		$ 42,995,724	$ 42,995,724	$ -		$ 12,761,131	$ 55,756,855		

CEI - Non-Residential

			8			8.48%			
Year	Beg. Bal.	Spend	Amort	Activity	End. Bal.	Return	Revenue	MWh	$/kWh
1	$ -	$ 13,744,473	$ 1,718,059	$ 12,026,414	$ 12,026,414	$ 509,920	$ 2,227,979	12,598,815	$0.000177
2	$ 12,026,414	$ 13,744,473	$ 3,436,118	$ 10,308,355	$ 22,334,769	$ 1,456,914	$ 4,893,033	12,598,815	$0.000389
3	$ 22,334,769	$ 13,744,473	$ 5,154,178	$ 8,590,296	$ 30,925,065	$ 2,258,217	$ 7,412,394	12,598,815	$0.000590
4	$ 30,925,065	$ 13,744,473	$ 6,872,237	$ 6,872,237	$ 37,797,302	$ 2,913,828	$ 9,786,065	12,598,815	$0.000779
5	$ 37,797,302	$ -	$ 6,872,237	$ (6,872,237)	$ 30,925,065	$ 2,913,828	$ 9,786,065	12,598,815	$0.000779
6	$ 30,925,065	$ -	$ 6,872,237	$ (6,872,237)	$ 24,052,828	$ 2,331,063	$ 9,203,299	12,598,815	$0.000732
7	$ 24,052,828	$ -	$ 6,872,237	$ (6,872,237)	$ 17,180,592	$ 1,748,297	$ 8,620,534	12,598,815	$0.000686
8	$ 17,180,592	$ -	$ 6,872,237	$ (6,872,237)	$ 10,308,355	$ 1,165,531	$ 8,037,768	12,598,815	$0.000640
9	$ 10,308,355	$ -	$ 5,154,178	$ (5,154,178)	$ 5,154,178	$ 655,611	$ 5,809,789	12,598,815	$0.000462
10	$ 5,154,178	$ -	$ 3,436,118	$ (3,436,118)	$ 1,718,059	$ 291,383	$ 3,727,501	12,598,815	$0.000297
11	$ 1,718,059	$ -	$ 1,718,059	$ (1,718,059)	$ (0)	$ 72,846	$ 1,790,905	12,598,815	$0.000143
		$ 54,977,893	$ 54,977,893	$ (0)		$ 16,317,439	$ 71,295,332		

TE - Residential

			8			8.48%			
Year	Beg. Bal.	Spend	Amort	Activity	End. Bal.	Return	Revenue	MWh	$/kWh
1	$ -	$ 4,829,933	$ 603,742	$ 4,226,192	$ 4,226,192	$ 179,191	$ 782,932	2,530,806	$0.000310
2	$ 4,226,192	$ 4,829,933	$ 1,207,483	$ 3,622,450	$ 7,848,642	$ 511,973	$ 1,719,456	2,530,806	$0.000681
3	$ 7,848,642	$ 4,829,933	$ 1,811,225	$ 3,018,708	$ 10,867,350	$ 793,558	$ 2,604,783	2,530,806	$0.001032
4	$ 10,867,350	$ 4,829,933	$ 2,414,967	$ 2,414,967	$ 13,282,316	$ 1,023,946	$ 3,438,912	2,530,806	$0.001362
5	$ 13,282,316	$ -	$ 2,414,967	$ (2,414,967)	$ 10,867,350	$ 1,023,946	$ 3,438,912	2,530,806	$0.001362
6	$ 10,867,350	$ -	$ 2,414,967	$ (2,414,967)	$ 8,452,383	$ 819,157	$ 3,234,123	2,530,806	$0.001281
7	$ 8,452,383	$ -	$ 2,414,967	$ (2,414,967)	$ 6,037,417	$ 614,368	$ 3,029,334	2,530,806	$0.001200
8	$ 6,037,417	$ -	$ 2,414,967	$ (2,414,967)	$ 3,622,450	$ 409,578	$ 2,824,545	2,530,806	$0.001119
9	$ 3,622,450	$ -	$ 1,811,225	$ (1,811,225)	$ 1,811,225	$ 230,388	$ 2,041,613	2,530,806	$0.000809
10	$ 1,811,225	$ -	$ 1,207,483	$ (1,207,483)	$ 603,742	$ 102,395	$ 1,309,878	2,530,806	$0.000519
11	$ 603,742	$ -	$ 603,742	$ (603,742)	$ -	$ 25,599	$ 629,340	2,530,806	$0.000249
		$ 19,319,733	$ 19,319,733	$ -		$ 5,734,097	$ 25,053,830		

TE - Non-Residential

			8			8.48%			
Year	Beg. Bal.	Spend	Amort	Activity	End. Bal.	Return	Revenue	MWh	$/kWh
1	$ -	$ 9,557,034	$ 1,194,629	$ 8,362,404	$ 8,362,404	$ 354,566	$ 1,549,195	8,760,416	$0.000177
2	$ 8,362,404	$ 9,557,034	$ 2,389,258	$ 7,167,775	$ 15,530,180	$ 1,013,046	$ 3,402,304	8,760,416	$0.000389
3	$ 15,530,180	$ 9,557,034	$ 3,583,888	$ 5,973,146	$ 21,503,326	$ 1,570,221	$ 5,154,108	8,760,416	$0.000590
4	$ 21,503,326	$ 9,557,034	$ 4,778,517	$ 4,778,517	$ 26,281,842	$ 2,026,091	$ 6,804,608	8,760,416	$0.000779
5	$ 26,281,842	$ -	$ 4,778,517	$ (4,778,517)	$ 21,503,326	$ 2,026,091	$ 6,804,608	8,760,416	$0.000779
6	$ 21,503,326	$ -	$ 4,778,517	$ (4,778,517)	$ 16,724,809	$ 1,620,873	$ 6,399,390	8,760,416	$0.000732
7	$ 16,724,809	$ -	$ 4,778,517	$ (4,778,517)	$ 11,946,292	$ 1,215,655	$ 5,994,171	8,760,416	$0.000686
8	$ 11,946,292	$ -	$ 4,778,517	$ (4,778,517)	$ 7,167,775	$ 810,436	$ 5,588,953	8,760,416	$0.000640
9	$ 7,167,775	$ -	$ 3,583,888	$ (3,583,888)	$ 3,583,888	$ 455,871	$ 4,039,758	8,760,416	$0.000462
10	$ 3,583,888	$ -	$ 2,389,258	$ (2,389,258)	$ 1,194,629	$ 202,609	$ 2,591,868	8,760,416	$0.000297
11	$ 1,194,629	$ -	$ 1,194,629	$ (1,194,629)	$ -	$ 50,652	$ 1,245,281	8,760,416	$0.000143
		$ 38,228,134	$ 38,228,134	$ -		$ 11,346,110	$ 49,574,244		

Proposed Rider EEC Annual Bill Impacts

Year	OE	CEI	TE	Average	Annual % Impact
ESP IV Current Bill	$ 141.64	$ 141.31	$ 142.19	$ 141.60	
Year 1	$ 0.23	$ 0.23	$ 0.23	$ 0.23	0.2%
Year 2	$ 0.51	$ 0.51	$ 0.51	$ 0.51	0.2%
Year 3	$ 0.77	$ 0.77	$ 0.77	$ 0.77	0.2%
Year 4	$ 1.02	$ 1.02	$ 1.02	$ 1.02	0.2%
Year 5	$ 1.02	$ 1.02	$ 1.02	$ 1.02	0.0%
Year 6	$ 0.96	$ 0.96	$ 0.96	$ 0.96	0.0%
Year 7	$ 0.90	$ 0.90	$ 0.90	$ 0.90	0.0%
Year 8	$ 0.84	$ 0.84	$ 0.84	$ 0.84	0.0%
Year 9	$ 0.61	$ 0.61	$ 0.61	$ 0.61	-0.2%
Year 10	$ 0.39	$ 0.39	$ 0.39	$ 0.39	-0.2%
Year 11	$ 0.19	$ 0.19	$ 0.19	$ 0.19	-0.1%

Annual Bill Impacts with Costs Recovered in Year Spent

Year	OE	CEI	TE	Average	Annual % Impact
ESP IV Current Bill	$ 141.64	$ 141.31	$ 142.19	$ 141.60	
Year 1	$ 1.44	$ 1.44	$ 1.44	$ 1.44	1.0%
Year 2	$ 1.44	$ 1.44	$ 1.44	$ 1.44	0.0%
Year 3	$ 1.44	$ 1.44	$ 1.44	$ 1.44	0.0%
Year 4	$ 1.44	$ 1.44	$ 1.44	$ 1.44	0.0%
Year 5	$ -	$ -	$ -	$ -	-1.0%
Year 6	$ -	$ -	$ -	$ -	0.0%
Year 7	$ -	$ -	$ -	$ -	0.0%
Year 8	$ -	$ -	$ -	$ -	0.0%
Year 9	$ -	$ -	$ -	$ -	0.0%
Year 10	$ -	$ -	$ -	$ -	0.0%
Year 11	$ -	$ -	$ -	$ -	0.0%

RIDER EEC
Energy Efficiency Cost Recovery Rider

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. The Energy Efficiency Cost Recovery Rider ("EEC") charges will apply effective for service rendered beginning June 1, 2024. This Rider is not avoidable for customers who take electric generation service from a certified supplier.

RATE:

Rider VMC charges will be a single cents per kWh rate for all kWh per month per customer billing account.

RS	X.XXXX¢
GS	X.XXXX¢
GP	X.XXXX ¢
GSU	X.XXXX ¢
GT	X.XXXX ¢
STL	X.XXXX ¢
TRF	X.XXXX ¢
POL	X.XXXX ¢

PROVISIONS:

Rider EEC is not applicable to customers who elected to opt-out of the Company's energy efficiency and demand response programs, pursuant to the Order dated [DATE] in Case No. 23-0301-EL-SSO.

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on an annual basis. On or about May 1st each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on June 1st of each year. This Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission.

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GT	X.XXXX ¢
STL	X.XXXX ¢
TRF	X.XXXX ¢
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RS	X.XXXX ¢
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		OE	CEI	TE	Total	Notes
(1)	Baseline In Base Rates	$ 13,534,322	$ 11,517,829	$ 4,544,660	$ 29,596,811	Source: Case No. 07-551-EL-AIR
(2)						
(3)	Base Vegetation Spend	$ 27,070,000	$ 18,100,000	$ 7,550,000	$ 52,720,000	Source: Current Company forecast
(4)	Expanded Vegetation Spend	$ 26,980,000	$ 14,780,000	$ 4,000,000	$ 45,760,000	Source: Current Company forecast
(5)	Total	$ 54,050,000	$ 32,880,000	$ 11,550,000	$ 98,480,000	Line 3 + Line 4
(6)						
(7)	Incremental Spend	$ 40,515,678	$ 21,362,171	$ 7,005,340	$ 68,883,189	Line 5 - Line 1
(8)						
(9)	Reconcilation of Inactive Tariffs	$ (12,773,080)	$ (3,412,688)	$ 1,586,555	$ (14,599,213)	One-time final reconciliation
(10)						
(11)	Prior Period Reconciliation	$ -	$ -	$ -	$ -	Source: Company records
(12)						
(13)	Revenue Requirement	$ 27,742,598	$ 17,949,483	$ 8,591,895	$ 54,283,976	Line 7 + Line 8 + Line 9
(14)						
(15)	Revenue Requirement w/ CAT	**$ 27,814,917**	**$ 17,996,273**	**$ 8,614,292**	**$ 54,425,482**	Line 13 / (1 - CAT)
(16)						
(17)						
(18)	**Allocation Factors**	**OE**	**CEI**	**TE**		
(19)	Rate RS	62.45%	47.55%	57.93%		Source: Case No. 07-551-EL-AIR
(20)	Rate GS	27.10%	42.23%	32.13%		Source: Case No. 07-551-EL-AIR
(21)	Rate GP	5.20%	0.63%	4.80%		Source: Case No. 07-551-EL-AIR
(22)	Rate GSU	0.85%	4.06%	0.11%		Source: Case No. 07-551-EL-AIR
(23)	Rate GT	2.19%	0.18%	1.38%		Source: Case No. 07-551-EL-AIR
(24)	Rate STL	1.39%	3.53%	2.91%		Source: Case No. 07-551-EL-AIR
(25)	Rate POL	0.76%	1.79%	0.69%		Source: Case No. 07-551-EL-AIR
(26)	Rate TRF	0.06%	0.03%	0.05%		Source: Case No. 07-551-EL-AIR
(27)	Total	100.00%	100.00%	100.00%		Sum (Lines 19-26)
(28)						
(29)	**Allocation to Rate Schedules**	**OE**	**CEI**	**TE**		
(30)	Rate RS	$ 17,370,416	$ 8,557,228	$ 4,990,259		Line 15 x Line 19
(31)	Rate GS	$ 7,537,707	$ 7,600,463	$ 2,767,448		Line 15 x Line 20
(32)	Rate GP	$ 1,446,573	$ 112,628	$ 413,910		Line 15 x Line 21
(33)	Rate GSU	$ 235,823	$ 730,142	$ 9,161		Line 15 x Line 22
(34)	Rate GT	$ 609,689	$ 33,012	$ 119,093		Line 15 x Line 23
(35)	Rate STL	$ 386,627	$ 635,268	$ 250,676		Line 15 x Line 24
(36)	Rate POL	$ 211,393	$ 322,133	$ 59,439		Line 15 x Line 25
(37)	Rate TRF	$ 16,689	$ 5,399	$ 4,307		Line 15 x Line 26
(38)	Total	$ 27,814,917	$ 17,996,273	$ 8,614,292		Sum (Lines 30-37)
(39)						
(40)	**Annual Units**	**OE**	**CEI**	**TE**		
(41)	Rate RS (MWh)	9,414,711	5,632,264	2,530,806		Source: Current Company forecast
(42)	Rate GS (MW)	22,346	19,265	6,526		Source: Current Company forecast
(43)	Rate GP (MW)	6,519	1,182	2,807		Source: Current Company forecast
(44)	Rate GSU (MW/MVA)	2,360	7,743	236		Source: Current Company forecast
(45)	Rate GT (MVA)	9,919	8,058	11,655		Source: Current Company forecast
(46)	Rate STL (MWh)	109,906	81,217	31,465		Source: Current Company forecast
(47)	Rate POL (MWh)	38,124	60,430	9,755		Source: Current Company forecast
(48)	Rate TRF (MWh)	13,436	16,160	1,992		Source: Current Company forecast
(49)						
(50)	**Rate**	**OE**	**CEI**	**TE**		
(51)	Rate RS ($/kWh)	$ 0.001845	$ 0.001519	$ 0.001972		Line 30 / Line 41 / 1,000
(52)	Rate GS ($/kW)	$ 0.3373	$ 0.3945	$ 0.4240		Line 31 / Line 42 / 1,000
(53)	Rate GP ($/kW)	$ 0.2219	$ 0.0953	$ 0.1474		Line 32 / Line 43 / 1,000
(54)	Rate GSU ($/kW / $/kVA)	$ 0.0999	$ 0.0943	$ 0.0388		Line 33 / Line 44 / 1,000
(55)	Rate GT ($/kVA)	$ 0.0615	$ 0.0041	$ 0.0102		Line 34 / Line 45 / 1,000
(56)	Rate STL ($/kWh)	$ 0.003518	$ 0.007822	$ 0.007967		Line 35 / Line 46 / 1,000
(57)	Rate POL ($/kWh)	$ 0.005545	$ 0.005331	$ 0.006093		Line 36 / Line 47 / 1,000
(58)	Rate TRF ($/kWh)	$ 0.001242	$ 0.000334	$ 0.002162		Line 37 / Line 48 / 1,000

OE	June 2024 - May 2025	June 2025 - May 2026	June 2026 - May 2027	June 2027 - May 2028	June 2028 - May 2029	June 2029 - May 2030	June 2030 - May 2031	June 2031 - May 2032
Baseline In Base Rates	$ 13,534,322	$ 13,534,322	$ 13,534,322	$ 13,534,322	$ 13,534,322	$ 13,534,322	$ 13,534,322	$ 13,534,322
Base Vegetation Spend	$ 27,070,000	$ 27,882,100	$ 28,718,563	$ 29,580,120	$ 30,467,523	$ 31,381,549	$ 32,322,996	$ 33,292,686
Expanded Vegetation Spend	$ 26,980,000	$ 27,580,000	$ 28,198,000	$ 28,834,540	$ 14,455,000	$ 14,679,250	$ 14,910,228	$ 15,148,134
Total	$ 54,050,000	$ 55,462,100	$ 56,916,563	$ 58,414,660	$ 44,922,523	$ 46,060,799	$ 47,233,223	$ 48,440,820
Incremental Spend	$ 40,515,678	$ 41,927,778	$ 43,382,241	$ 44,880,338	$ 31,388,201	$ 32,526,477	$ 33,698,901	$ 34,906,498
Reconcilation of Inactive Tariffs	$ (12,773,080)	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Prior Period Reconciliation	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Revenue Requirement	$ 27,742,598	$ 41,927,778	$ 43,382,241	$ 44,880,338	$ 31,388,201	$ 32,526,477	$ 33,698,901	$ 34,906,498
Revenue Requirement w/ CAT	**$ 27,814,917**	**$ 42,037,074**	**$ 43,495,329**	**$ 44,997,331**	**$ 31,470,024**	**$ 32,611,266**	**$ 33,786,747**	**$ 34,997,491**

Allocation Factors								
Rate RS	62.45%	62.45%	62.45%	62.45%	62.45%	62.45%	62.45%	62.45%
Rate GS	27.10%	27.10%	27.10%	27.10%	27.10%	27.10%	27.10%	27.10%
Rate GP	5.20%	5.20%	5.20%	5.20%	5.20%	5.20%	5.20%	5.20%
Rate GSU	0.85%	0.85%	0.85%	0.85%	0.85%	0.85%	0.85%	0.85%
Rate GT	2.19%	2.19%	2.19%	2.19%	2.19%	2.19%	2.19%	2.19%
Rate STL	1.39%	1.39%	1.39%	1.39%	1.39%	1.39%	1.39%	1.39%
Rate POL	0.76%	0.76%	0.76%	0.76%	0.76%	0.76%	0.76%	0.76%
Rate TRF	0.06%	0.06%	0.06%	0.06%	0.06%	0.06%	0.06%	0.06%
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Allocation to Rate Schedules								
Rate RS	$ 17,370,416	$ 26,252,153	$ 27,162,833	$ 28,100,833	$ 19,653,030	$ 20,365,736	$ 21,099,823	$ 21,855,933
Rate GS	$ 7,537,707	$ 11,391,843	$ 11,787,023	$ 12,194,058	$ 8,528,224	$ 8,837,495	$ 9,156,044	$ 9,484,150
Rate GP	$ 1,446,573	$ 2,186,225	$ 2,262,065	$ 2,340,180	$ 1,636,664	$ 1,696,017	$ 1,757,150	$ 1,820,117
Rate GSU	$ 235,823	$ 356,403	$ 368,766	$ 381,500	$ 266,812	$ 276,488	$ 286,454	$ 296,719
Rate GT	$ 609,689	$ 921,431	$ 953,395	$ 986,318	$ 689,807	$ 714,822	$ 740,588	$ 767,127
Rate STL	$ 386,627	$ 584,315	$ 604,585	$ 625,463	$ 437,433	$ 453,297	$ 469,636	$ 486,465
Rate POL	$ 211,393	$ 319,482	$ 330,564	$ 341,980	$ 239,172	$ 247,846	$ 256,779	$ 265,981
Rate TRF	$ 16,689	$ 25,222	$ 26,097	$ 26,998	$ 18,882	$ 19,567	$ 20,272	$ 20,998
Total	$ 27,814,917	$ 42,037,074	$ 43,495,329	$ 44,997,331	$ 31,470,024	$ 32,611,266	$ 33,786,747	$ 34,997,491

Annual Units								
Rate RS (MWh)	9,414,711	9,414,711	9,414,711	9,414,711	9,414,711	9,414,711	9,414,711	9,414,711
Rate GS (MW)	22,346	22,346	22,346	22,346	22,346	22,346	22,346	22,346
Rate GP (MW)	6,519	6,519	6,519	6,519	6,519	6,519	6,519	6,519
Rate GSU (MW/MVA)	2,360	2,360	2,360	2,360	2,360	2,360	2,360	2,360
Rate GT (MVA)	9,919	9,919	9,919	9,919	9,919	9,919	9,919	9,919
Rate STL (MWh)	109,906	109,906	109,906	109,906	109,906	109,906	109,906	109,906
Rate POL (MWh)	38,124	38,124	38,124	38,124	38,124	38,124	38,124	38,124
Rate TRF (MWh)	13,436	13,436	13,436	13,436	13,436	13,436	13,436	13,436

Rate								
Rate RS ($/kWh)	$ 0.001845	$ 0.002788	$ 0.002885	$ 0.002985	$ 0.002087	$ 0.002163	$ 0.002241	$ 0.002321
Rate GS ($/kW)	$ 0.3373	$ 0.5098	$ 0.5275	$ 0.5457	$ 0.3817	$ 0.3955	$ 0.4097	$ 0.4244
Rate GP ($/kW)	$ 0.2219	$ 0.3354	$ 0.3470	$ 0.3590	$ 0.2511	$ 0.2602	$ 0.2696	$ 0.2792
Rate GSU ($/kW / $/kVA)	$ 0.0999	$ 0.1510	$ 0.1562	$ 0.1616	$ 0.1130	$ 0.1171	$ 0.1214	$ 0.1257
Rate GT ($/kVA)	$ 0.0615	$ 0.0929	$ 0.0961	$ 0.0994	$ 0.0695	$ 0.0721	$ 0.0747	$ 0.0773
Rate STL ($/kWh)	$ 0.003518	$ 0.005317	$ 0.005501	$ 0.005691	$ 0.003980	$ 0.004124	$ 0.004273	$ 0.004426
Rate POL ($/kWh)	$ 0.005545	$ 0.008380	$ 0.008671	$ 0.008970	$ 0.006273	$ 0.006501	$ 0.006735	$ 0.006977
Rate TRF ($/kWh)	$ 0.001242	$ 0.001877	$ 0.001942	$ 0.002009	$ 0.001405	$ 0.001456	$ 0.001509	$ 0.001563

Vegetation Management Cost Recovery Rider | **Attachment BSM-4**
Estimated Rates | **P. 3**

CEI	June 2024 - May 2025	June 2025 - May 2026	June 2026 - May 2027	June 2027 - May 2028	June 2028 - May 2029	June 2029 - May 2030	June 2030 - May 2031	June 2031 - May 2032
Baseline In Base Rates	$ 11,517,829	$ 11,517,829	$ 11,517,829	$ 11,517,829	$ 11,517,829	$ 11,517,829	$ 11,517,829	$ 11,517,829
Base Vegetation Spend	$ 18,100,000	$ 18,643,000	$ 19,202,290	$ 19,778,359	$ 20,371,709	$ 20,982,861	$ 21,612,347	$ 22,260,717
Expanded Vegetation Spend	$ 14,780,000	$ 15,110,000	$ 15,449,900	$ 15,799,997	$ 8,667,500	$ 8,814,125	$ 8,965,149	$ 9,120,703
Total	$ 32,880,000	$ 33,753,000	$ 34,652,190	$ 35,578,356	$ 29,039,209	$ 29,796,986	$ 30,577,495	$ 31,381,420
Incremental Spend	$ 21,362,171	$ 22,235,171	$ 23,134,361	$ 24,060,527	$ 17,521,380	$ 18,279,157	$ 19,059,666	$ 19,863,591
Reconcilation of Inactive Tariffs	$ (3,412,688)	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Prior Period Reconciliation	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Revenue Requirement	$ 17,949,483	$ 22,235,171	$ 23,134,361	$ 24,060,527	$ 17,521,380	$ 18,279,157	$ 19,059,666	$ 19,863,591
Revenue Requirement w/ CAT	**$ 17,996,273**	**$ 22,293,133**	**$ 23,194,667**	**$ 24,123,247**	**$ 17,567,055**	**$ 18,326,806**	**$ 19,109,351**	**$ 19,915,371**

Allocation Factors

Rate RS	47.55%	47.55%	47.55%	47.55%	47.55%	47.55%	47.55%	47.55%
Rate GS	42.23%	42.23%	42.23%	42.23%	42.23%	42.23%	42.23%	42.23%
Rate GP	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%
Rate GSU	4.06%	4.06%	4.06%	4.06%	4.06%	4.06%	4.06%	4.06%
Rate GT	0.18%	0.18%	0.18%	0.18%	0.18%	0.18%	0.18%	0.18%
Rate STL	3.53%	3.53%	3.53%	3.53%	3.53%	3.53%	3.53%	3.53%
Rate POL	1.79%	1.79%	1.79%	1.79%	1.79%	1.79%	1.79%	1.79%
Rate TRF	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Allocation to Rate Schedules

Rate RS	$ 8,557,228	$ 10,600,385	$ 11,029,064	$ 11,470,604	$ 8,353,135	$ 8,714,396	$ 9,086,496	$ 9,469,759
Rate GS	$ 7,600,463	$ 9,415,179	$ 9,795,929	$ 10,188,101	$ 7,419,189	$ 7,740,059	$ 8,070,555	$ 8,410,966
Rate GP	$ 112,628	$ 139,520	$ 145,162	$ 150,973	$ 109,942	$ 114,697	$ 119,594	$ 124,639
Rate GSU	$ 730,142	$ 904,473	$ 941,050	$ 978,724	$ 712,727	$ 743,552	$ 775,301	$ 808,003
Rate GT	$ 33,012	$ 40,894	$ 42,547	$ 44,251	$ 32,224	$ 33,618	$ 35,054	$ 36,532
Rate STL	$ 635,268	$ 786,948	$ 818,772	$ 851,551	$ 620,117	$ 646,936	$ 674,560	$ 703,013
Rate POL	$ 322,133	$ 399,047	$ 415,185	$ 431,806	$ 314,450	$ 328,050	$ 342,057	$ 356,485
Rate TRF	$ 5,399	$ 6,688	$ 6,958	$ 7,237	$ 5,270	$ 5,498	$ 5,733	$ 5,975
Total	$ 17,996,273	$ 22,293,133	$ 23,194,667	$ 24,123,247	$ 17,567,055	$ 18,326,806	$ 19,109,351	$ 19,915,371

Annual Units

Rate RS (MWh)	5,632,264	5,632,264	5,632,264	5,632,264	5,632,264	5,632,264	5,632,264	5,632,264
Rate GS (MW)	19,265	19,265	19,265	19,265	19,265	19,265	19,265	19,265
Rate GP (MW)	1,182	1,182	1,182	1,182	1,182	1,182	1,182	1,182
Rate GSU (MW/MVA)	7,743	7,743	7,743	7,743	7,743	7,743	7,743	7,743
Rate GT (MVA)	8,058	8,058	8,058	8,058	8,058	8,058	8,058	8,058
Rate STL (MWh)	81,217	81,217	81,217	81,217	81,217	81,217	81,217	81,217
Rate POL (MWh)	60,430	60,430	60,430	60,430	60,430	60,430	60,430	60,430
Rate TRF (MWh)	16,160	16,160	16,160	16,160	16,160	16,160	16,160	16,160

Rate

Rate RS ($/kWh)	$ 0.001519	$ 0.001882	$ 0.001958	$ 0.002037	$ 0.001483	$ 0.001547	$ 0.001613	$ 0.001681
Rate GS ($/kW)	$ 0.3945	$ 0.0017	$ 0.5085	$ 0.5288	$ 0.3851	$ 0.4018	$ 0.4189	$ 0.4366
Rate GP ($/kW)	$ 0.0953	$ 0.1180	$ 0.1228	$ 0.1277	$ 0.0930	$ 0.0970	$ 0.1012	$ 0.1054
Rate GSU ($/kW / $/kVA)	$ 0.0943	$ 0.1168	$ 0.1215	$ 0.1264	$ 0.0920	$ 0.0960	$ 0.1001	$ 0.1044
Rate GT ($/kVA)	$ 0.0041	$ 0.0051	$ 0.0053	$ 0.0055	$ 0.0040	$ 0.0042	$ 0.0044	$ 0.0045
Rate STL ($/kWh)	$ 0.007822	$ 0.009689	$ 0.010081	$ 0.010485	$ 0.007635	$ 0.007966	$ 0.008306	$ 0.008656
Rate POL ($/kWh)	$ 0.005331	$ 0.006603	$ 0.006870	$ 0.007146	$ 0.005204	$ 0.005429	$ 0.005660	$ 0.005899
Rate TRF ($/kWh)	$ 0.000334	$ 0.000414	$ 0.000431	$ 0.000448	$ 0.000326	$ 0.000340	$ 0.000355	$ 0.000370

TE	**June 2024 - May 2025**	**June 2025 - May 2026**	**June 2026 - May 2027**	**June 2027 - May 2028**	**June 2028 - May 2029**	**June 2029 - May 2030**	**June 2030 - May 2031**	**June 2031 - May 2032**
Baseline In Base Rates	$ 4,544,660	$ 4,544,660	$ 4,544,660	$ 4,544,660	$ 4,544,660	$ 4,544,660	$ 4,544,660	$ 4,544,660
Base Vegetation Spend	$ 6,560,000	$ 6,756,800	$ 6,959,504	$ 7,168,289	$ 7,383,338	$ 7,604,838	$ 7,832,983	$ 8,067,973
Expanded Vegetation Spend	$ 4,990,000	$ 5,110,000	$ 5,233,600	$ 5,360,908	$ 2,830,000	$ 2,885,200	$ 2,942,056	$ 3,000,618
Total	$ 11,550,000	$ 11,866,800	$ 12,193,104	$ 12,529,197	$ 10,213,338	$ 10,490,038	$ 10,775,039	$ 11,068,590
Incremental Spend	$ 7,005,340	$ 7,322,140	$ 7,648,444	$ 7,984,537	$ 5,668,678	$ 5,945,378	$ 6,230,379	$ 6,523,930
Reconcilation of Inactive Tariffs	$ 1,586,555	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Prior Period Reconciliation	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Revenue Requirement	$ 8,591,895	$ 7,322,140	$ 7,648,444	$ 7,984,537	$ 5,668,678	$ 5,945,378	$ 6,230,379	$ 6,523,930
Revenue Requirement w/ CAT	**$ 8,614,292**	**$ 7,341,227**	**$ 7,668,382**	**$ 8,005,351**	**$ 5,683,455**	**$ 5,960,876**	**$ 6,246,620**	**$ 6,540,936**

Allocation Factors								
Rate RS	57.93%	57.93%	57.93%	57.93%	57.93%	57.93%	57.93%	57.93%
Rate GS	32.13%	32.13%	32.13%	32.13%	32.13%	32.13%	32.13%	32.13%
Rate GP	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%	4.80%
Rate GSU	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%
Rate GT	1.38%	1.38%	1.38%	1.38%	1.38%	1.38%	1.38%	1.38%
Rate STL	2.91%	2.91%	2.91%	2.91%	2.91%	2.91%	2.91%	2.91%
Rate POL	0.69%	0.69%	0.69%	0.69%	0.69%	0.69%	0.69%	0.69%
Rate TRF	0.05%	0.05%	0.05%	0.05%	0.05%	0.05%	0.05%	0.05%
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Allocation to Rate Schedules								
Rate RS	$ 4,990,259	$ 4,252,773	$ 4,442,293	$ 4,637,500	$ 3,292,425	$ 3,453,135	$ 3,618,667	$ 3,789,164
Rate GS	$ 2,767,448	$ 2,358,460	$ 2,463,562	$ 2,571,818	$ 1,825,880	$ 1,915,005	$ 2,006,804	$ 2,101,357
Rate GP	$ 413,910	$ 352,740	$ 368,459	$ 384,650	$ 273,085	$ 286,415	$ 300,145	$ 314,287
Rate GSU	$ 9,161	$ 7,807	$ 8,155	$ 8,513	$ 6,044	$ 6,339	$ 6,643	$ 6,956
Rate GT	$ 119,093	$ 101,493	$ 106,015	$ 110,674	$ 78,574	$ 82,409	$ 86,360	$ 90,429
Rate STL	$ 250,676	$ 213,630	$ 223,150	$ 232,956	$ 165,389	$ 173,461	$ 181,777	$ 190,341
Rate POL	$ 59,439	$ 50,654	$ 52,912	$ 55,237	$ 39,216	$ 41,130	$ 43,102	$ 45,132
Rate TRF	$ 4,307	$ 3,671	$ 3,834	$ 4,003	$ 2,842	$ 2,980	$ 3,123	$ 3,270
Total	$ 8,614,292	$ 7,341,227	$ 7,668,382	$ 8,005,351	$ 5,683,455	$ 5,960,876	$ 6,246,620	$ 6,540,936

Annual Units								
Rate RS (MWh)	2,530,806	2,530,806	2,530,806	2,530,806	2,530,806	2,530,806	2,530,806	2,530,806
Rate GS (MW)	6,526	6,526	6,526	6,526	6,526	6,526	6,526	6,526
Rate GP (MW)	2,807	2,807	2,807	2,807	2,807	2,807	2,807	2,807
Rate GSU (MW/MVA)	236	236	236	236	236	236	236	236
Rate GT (MVA)	11,655	11,655	11,655	11,655	11,655	11,655	11,655	11,655
Rate STL (MWh)	31,465	31,465	31,465	31,465	31,465	31,465	31,465	31,465
Rate POL (MWh)	9,755	9,755	9,755	9,755	9,755	9,755	9,755	9,755
Rate TRF (MWh)	1,992	1,992	1,992	1,992	1,992	1,992	1,992	1,992

Rate								
Rate RS ($/kWh)	$ 0.001972	$ 0.001680	$ 0.001755	$ 0.001832	$ 0.001301	$ 0.001364	$ 0.001430	$ 0.001497
Rate GS ($/kW)	$ 0.4240	$ 0.0009	$ 0.3775	$ 0.3941	$ 0.2798	$ 0.2934	$ 0.3075	$ 0.3220
Rate GP ($/kW)	$ 0.1474	$ 0.1256	$ 0.1312	$ 0.1370	$ 0.0973	$ 0.1020	$ 0.1069	$ 0.1120
Rate GSU ($/kW / $/kVA)	$ 0.0388	$ 0.0330	$ 0.0345	$ 0.0360	$ 0.0256	$ 0.0268	$ 0.0281	$ 0.0294
Rate GT ($/kVA)	$ 0.0102	$ 0.0087	$ 0.0091	$ 0.0095	$ 0.0067	$ 0.0071	$ 0.0074	$ 0.0078
Rate STL ($/kWh)	$ 0.007967	$ 0.006789	$ 0.007092	$ 0.007404	$ 0.005256	$ 0.005513	$ 0.005777	$ 0.006049
Rate POL ($/kWh)	$ 0.006093	$ 0.005193	$ 0.005424	$ 0.005662	$ 0.004020	$ 0.004216	$ 0.004418	$ 0.004626
Rate TRF ($/kWh)	$ 0.002162	$ 0.001843	$ 0.001925	$ 0.002010	$ 0.001427	$ 0.001496	$ 0.001568	$ 0.001642

TOTAL

	June 2024 - May 2025	June 2025 - May 2026	June 2026 - May 2027	June 2027 - May 2028	June 2028 - May 2029	June 2029 - May 2030	June 2030 - May 2031	June 2031 - May 2032
Baseline In Base Rates	$ 29,596,811	$ 29,596,811	$ 29,596,811	$ 29,596,811	$ 29,596,811	$ 29,596,811	$ 29,596,811	$ 29,596,811
Base Vegetation Spend	$ 51,730,000	$ 53,281,900	$ 54,880,357	$ 56,526,768	$ 58,222,571	$ 59,969,248	$ 61,768,325	$ 63,621,375
Expanded Vegetation Spend	$ 46,750,000	$ 47,800,000	$ 48,881,500	$ 49,995,445	$ 25,952,500	$ 26,378,575	$ 26,817,432	$ 27,269,455
Total	$ 98,480,000	$ 101,081,900	$ 103,761,857	$ 106,522,213	$ 84,175,071	$ 86,347,823	$ 88,585,758	$ 90,890,830
Incremental Spend	$ 68,883,189	$ 71,485,089	$ 74,165,046	$ 76,925,401	$ 54,578,259	$ 56,751,012	$ 58,988,946	$ 61,294,019
Reconcilation of Inactive Tariffs	$ (14,599,213)	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Prior Period Reconciliation	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Revenue Requirement	$ 54,283,976	$ 71,485,089	$ 74,165,046	$ 76,925,401	$ 54,578,259	$ 56,751,012	$ 58,988,946	$ 61,294,019
Revenue Requirement w/ CAT	**$ 54,425,482**	**$ 71,671,434**	**$ 74,358,377**	**$ 77,125,929**	**$ 54,720,533**	**$ 56,898,949**	**$ 59,142,717**	**$ 61,453,799**
Allocation Factors								
Rate RS	56.81%	56.81%	56.81%	56.81%	56.81%	56.81%	56.81%	56.81%
Rate GS	32.90%	32.90%	32.90%	32.90%	32.90%	32.90%	32.90%	32.90%
Rate GP	3.63%	3.63%	3.63%	3.63%	3.63%	3.63%	3.63%	3.63%
Rate GSU	1.79%	1.79%	1.79%	1.79%	1.79%	1.79%	1.79%	1.79%
Rate GT	1.40%	1.40%	1.40%	1.40%	1.40%	1.40%	1.40%	1.40%
Rate STL	2.34%	2.34%	2.34%	2.34%	2.34%	2.34%	2.34%	2.34%
Rate POL	1.09%	1.09%	1.09%	1.09%	1.09%	1.09%	1.09%	1.09%
Rate TRF	0.05%	0.05%	0.05%	0.05%	0.05%	0.05%	0.05%	0.05%
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Allocation to Rate Schedules								
Rate RS	$ 30,917,903	$ 41,105,311	$ 42,634,190	$ 44,208,937	$ 31,298,589	$ 32,533,268	$ 33,804,986	$ 35,114,857
Rate GS	$ 17,905,618	$ 23,165,482	$ 24,046,514	$ 24,953,977	$ 17,773,293	$ 18,492,559	$ 19,233,403	$ 19,996,473
Rate GP	$ 1,973,110	$ 2,678,485	$ 2,775,686	$ 2,875,804	$ 2,019,691	$ 2,097,129	$ 2,176,889	$ 2,259,043
Rate GSU	$ 975,126	$ 1,268,683	$ 1,317,971	$ 1,368,738	$ 985,584	$ 1,026,379	$ 1,068,398	$ 1,111,678
Rate GT	$ 761,793	$ 1,063,817	$ 1,101,958	$ 1,141,243	$ 800,605	$ 830,849	$ 862,001	$ 894,088
Rate STL	$ 1,272,572	$ 1,584,893	$ 1,646,507	$ 1,709,969	$ 1,222,939	$ 1,273,694	$ 1,325,972	$ 1,379,819
Rate POL	$ 592,965	$ 769,183	$ 798,661	$ 829,023	$ 592,838	$ 617,026	$ 641,938	$ 667,599
Rate TRF	$ 26,395	$ 35,581	$ 36,890	$ 38,238	$ 26,994	$ 28,045	$ 29,128	$ 30,244
Total	$ 54,425,482	$ 71,671,434	$ 74,358,377	$ 77,125,929	$ 54,720,533	$ 56,898,949	$ 59,142,717	$ 61,453,799
Annual Units								
Rate RS (MWh)	17,577,781	17,577,781	17,577,781	17,577,781	17,577,781	17,577,781	17,577,781	17,577,781
Rate GS (MW)	48,137	48,137	48,137	48,137	48,137	48,137	48,137	48,137
Rate GP (MW)	10,508	10,508	10,508	10,508	10,508	10,508	10,508	10,508
Rate GSU (MW/MVA)	10,340	10,340	10,340	10,340	10,340	10,340	10,340	10,340
Rate GT (MVA)	29,633	29,633	29,633	29,633	29,633	29,633	29,633	29,633
Rate STL (MWh)	222,588	222,588	222,588	222,588	222,588	222,588	222,588	222,588
Rate POL (MWh)	108,310	108,310	108,310	108,310	108,310	108,310	108,310	108,310
Rate TRF (MWh)	31,588	31,588	31,588	31,588	31,588	31,588	31,588	31,588
Rate								
Rate RS ($/kWh)	$ 0.001759	$ 0.002338	$ 0.002425	$ 0.002515	$ 0.001781	$ 0.001851	$ 0.001923	$ 0.001998
Rate GS ($/kW)	$ 0.3720	$ 0.0013	$ 0.4995	$ 0.5184	$ 0.3692	$ 0.3842	$ 0.3996	$ 0.4154
Rate GP ($/kW)	$ 0.1878	$ 0.2549	$ 0.2641	$ 0.2737	$ 0.1922	$ 0.1996	$ 0.2072	$ 0.2150
Rate GSU ($/kW / $/kVA)	$ 0.0943	$ 0.1227	$ 0.1275	$ 0.1324	$ 0.0953	$ 0.0993	$ 0.1033	$ 0.1075
Rate GT ($/kVA)	$ 0.0257	$ 0.0359	$ 0.0372	$ 0.0385	$ 0.0270	$ 0.0280	$ 0.0291	$ 0.0302
Rate STL ($/kWh)	$ 0.005717	$ 0.007120	$ 0.007397	$ 0.007682	$ 0.005494	$ 0.005722	$ 0.005957	$ 0.006199
Rate POL ($/kWh)	$ 0.005475	$ 0.007102	$ 0.007374	$ 0.007654	$ 0.005474	$ 0.005697	$ 0.005927	$ 0.006164
Rate TRF ($/kWh)	$ 0.000836	$ 0.001126	$ 0.001168	$ 0.001211	$ 0.000855	$ 0.000888	$ 0.000922	$ 0.000957

Vegetation Management Cost Recovery Rider | **Attachment BSM-4**
Estimated Typical Bills | **P. 6**
Residential Customer using 750 kWh

I. Annual Rider VMC Charge

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)
	ESP IV								
OPCO	**Total Bill**	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 5**	**Year 6**	**Year 7**	**Year 8**
OE	$ 141.64	$ 1.38	$ 2.09	$ 2.16	$ 2.24	$ 1.57	$ 1.62	$ 1.68	$ 1.74
CEI	$ 141.31	$ 1.14	$ 1.41	$ 1.47	$ 1.53	$ 1.11	$ 1.16	$ 1.21	$ 1.26
TE	$ 142.19	$ 1.48	$ 1.48	$ 1.26	$ 1.32	$ 1.37	$ 0.98	$ 1.02	$ 1.07
Average	$ 141.60	$ 1.31	$ 1.76	$ 1.79	$ 1.85	$ 1.38	$ 1.36	$ 1.42	$ 1.47

II. Annual % Bill Impact

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)
	ESP IV								
OPCO	**Total Bill**	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 5**	**Year 6**	**Year 7**	**Year 8**
OE	$ 141.64	1.0%	0.5%	0.1%	0.1%	-0.5%	0.0%	0.0%	0.0%
CEI	$ 141.31	0.8%	0.2%	0.0%	0.0%	-0.3%	0.0%	0.0%	0.0%
TE	$ 142.19	1.0%	0.0%	-0.2%	0.0%	0.0%	-0.3%	0.0%	0.0%
Average	$ 141.60	0.9%	0.3%	0.0%	0.0%	-0.3%	0.0%	0.0%	0.0%

RIDER VMC
Vegetation Management Cost Recovery Rider

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. The Vegetation Management Cost Recovery Rider (VMC) charges will apply effective for service rendered beginning June 1, 2024. This Rider is not avoidable for customers who take electric generation service from a certified supplier.

RATE:

RS (all kWhs, per kWh)	X.XXXX¢
GS (per kW of Billing Demand)	$X.XXXX
GP (per kW of Billing Demand)	$ X.XXXX
GSU (per kW of Billing Demand)	$ X.XXXX
GT (per kVa of Billing Demand)	$ X.XXXX
STL (all kWhs, per kWh)	X.XXXX ¢
TRF (all kWhs, per kWh)	X.XXXX ¢
POL (all kWhs, per kWh)	X.XXXX ¢

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on an annual basis. On or about May 1st each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on June 1st of each year. This Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission.

RIDER VMC
Vegetation Management Cost Recovery Rider

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. The Vegetation Management Cost Recovery Rider (VMC) charges will apply effective for service rendered beginning June 1, 2024. This Rider is not avoidable for customers who take electric generation service from a certified supplier.

RATE:

RS (all kWhs, per kWh)	X.XXXX ¢
GS (per kW of Billing Demand)	$ X.XXXX
GP (per kW of Billing Demand)	$ X.XXXX
GSU (per kVa of Billing Demand)	$ X.XXXX
GT (per kVa of Billing Demand)	$ X.XXXX
STL (all kWhs, per kWh)	X.XXXX ¢
TRF (all kWhs, per kWh)	X.XXXX ¢
POL (all kWhs, per kWh)	X.XXXX ¢

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RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on an annual basis. On or about May 1st each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on June 1st of each year. This Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission.

RIDER VMC
Vegetation Management Cost Recovery Rider

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. The Vegetation Management Cost Recovery Rider (VMC) charges will apply effective for service rendered beginning June 1, 2024. This Rider is not avoidable for customers who take electric generation service from a certified supplier.

RATE:

RS (all kWhs, per kWh)	X.XXXX ¢
GS (per kW of Billing Demand)	$ X.XXXX
GP (per kW of Billing Demand)	$ X.XXXX
GSU (per kVa of Billing Demand)	$ X.XXXX
GT (per kVa of Billing Demand)	$ X.XXXX
STL (all kWhs, per kWh)	X.XXXX ¢
TRF (all kWhs, per kWh)	X.XXXX ¢
POL (all kWhs, per kWh)	X.XXXX ¢

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on an annual basis. On or about May 1st each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on June 1st of each year. This Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission.