



January 10, 2023

BY E-MAIL¹

Daniel C. Goldner, Chairman
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

Re: Unitil Energy Systems, Inc., DE 23-_____
Proposed Purchase of Receivables Program

Dear Chairman Goldner:

New Hampshire’s municipal aggregation law, Revised Statutes Annotated (“RSA”) Chapter 53-E authorized municipalities to aggregate electric power supply and operate approved aggregation programs. RSA 53-E:3-a. In 2021, New Hampshire House Bill 315 added Section 9 to RSA 53-E. Section 9 requires each electric distribution utility to propose to the New Hampshire Public Utilities Commission (the “Commission”) a program for the purchase of receivables from suppliers (“POR Program”).

Pursuant to RSA 53-E:7.X, the Commission initiated a rulemaking in January 2022 to promulgate rules to implement RSA 53-E (i.e., Docket No. DRM 21-142). On October 7, 2022, the Commission filed final rules implementing the provisions of RSA 53-E (the “Puc 2200 Rules”). The Commission set October 12, 2022 as the effective date for the Puc 2200 Rules.

Among other things, the PUC 2200 Rules require each electric distribution utility to propose a POR Program within 90 days of the effective date of the Puc 2200 Rules (i.e., by January 10, 2023). Puc 2205.16(e). In compliance with this requirement, Unitil Energy Systems Inc. hereby submits its proposed POR Program.

¹ This filing is made electronically in accordance with the Secretarial Letter dated March 17, 2020.

Please do not hesitate to contact me if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink that reads "Matthew Campbell". The signature is written in a cursive style with a large, prominent "M" and "C".

Matthew C. Campbell

cc: New Hampshire Department of Energy
Office of the Consumer Advocate
Service List, DRM 21-142

STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

UNITIL ENERGY SYSTEMS, INC.

JOINT DIRECT TESTIMONY OF
CHRISTOPHER J. GOULDING AND S. ELENA DEMERIS

EXHIBIT CJGSED-1

Docket No. DE 23-_____

Purchase of Receivables Program

January 10, 2023

Table of Contents

I.	INTRODUCTION	1
II.	DISCOUNT PERCENTAGE RATE COMPONENTS & CALCULATION	4
A.	Uncollectable Percentage	6
B.	Administrative Cost Percentage	7
C.	Past Period Reconciliation Percentage (“PPRP”)	9
D.	Total DPR Estimate.....	10
III.	POR PROGRAM MECHANICS	10
IV.	IMPLEMENTATION TIMELINE.....	12
V.	CONCLUSION.....	13

Exhibit

Exhibit CJGSED-2 Illustrative Discount Percentage Rate Calculations

1 **I. INTRODUCTION**

2 **Q. Mr. Goulding, please state your name and business addresses.**

3 A. My name is Christopher J. Goulding, and my business address is 6 Liberty Lane
4 West, Hampton, New Hampshire 03842.

5 **Q. What is your position and what are your responsibilities?**

6 A. I am the Director of Rates and Revenue Requirements for Unitil Service Corp., a
7 subsidiary of Unitil Corporation that provides managerial, financial, regulatory, and
8 engineering services to Unitil Corporation's utility subsidiaries including Unitil
9 Energy Systems, Inc. (the "Company" or "UES"). My responsibilities include all
10 rate and regulatory filings related to the financial requirements of UES and its
11 affiliates.

12 **Q. Please describe your business and educational background.**

13 A. In 2000, I was hired by NSTAR Electric & Gas Company and held various positions
14 with increasing responsibilities in Accounting, Corporate Finance, and Regulatory.
15 I was hired by Unitil Service Corp. in early 2019 to perform my current job
16 responsibilities.

17 I earned a Bachelor of Science degree in Business Administration from Northeastern
18 University in 2000 and a Master of Business Administration from Boston College
19 in 2009.

1 **Q. Mr. Goulding, have you previously testified before the New Hampshire Public**
2 **Utilities Commission (“Commission”) or other regulatory agencies?**

3 A. Yes, I have testified before the Commission on various financial, ratemaking, and
4 utility regulation matters, including utility cost of service and revenue requirements
5 analysis. I have also testified before the Maine Public Utilities Commission and
6 Massachusetts Department of Public Utilities on similar matters on several
7 occasions.

8 **Q. Ms. Demeris, please state your name and business address.**

9 A. My name is S. Elena Demeris. My business address is 6 Liberty Lane West,
10 Hampton, New Hampshire.

11 **Q. For whom do you work and in what capacity?**

12 A. I am a Senior Regulatory Analyst for Unitil Service Corp., a subsidiary of Unitil
13 Corporation that provides managerial, financial, regulatory, and engineering
14 services to Unitil Corporation’s principal subsidiaries: Fitchburg Gas and Electric
15 Light Company, d/b/a Unitil, Granite State Gas Transmission, Inc., Northern
16 Utilities, Inc. d/b/a Unitil, and UES. In this capacity, I am responsible for preparing
17 regulatory filings, pricing research, regulatory analysis, tariff administration,
18 revenue requirements calculations, customer research, and other analytical services.

1 **Q. Please summarize your professional and educational background.**

2 A. In 1996, I graduated from the University of Massachusetts-Lowell with a Bachelor's
3 of Science Degree in Civil Engineering. In 2005, I earned a Master's Degree in
4 Business Administration and in 2006 a Master's Degree in Finance from Southern
5 New Hampshire University. I joined Unitil in July 1998 in the regulatory/rate
6 department.

7 **Q. What is the purpose of your testimony?**

8 A. New Hampshire's municipal aggregation law, Revised Statutes Annotated ("RSA")
9 Chapter 53-E authorized municipalities to aggregate electric power supply and
10 operate approved aggregation programs. RSA 53-E:3-a. In 2021, New Hampshire
11 House Bill 315 added Section 9 to RSA 53-E. Section 9 requires each electric
12 distribution utility to propose to the Commission a program for the purchase of
13 receivables from suppliers ("POR Program"). Section 9 requires utilities to make
14 timely payment of amounts due to suppliers from customers less a discount
15 percentage rate ("DPR"). RSA 53-E:9. The DPR is equal to the utility's
16 uncollectable rate, adjusted to recover the capitalized and operating costs specific to
17 implementation and operation of the POR Program, including working capital. *Id.*
18 The DPR also includes a pro rata share of the utility's cost to administer collection
19 efforts, and such costs must include, but not be limited to, any increases in bad debt
20 write-offs attributable to the POR Program. *Id.* The DPR is subject to periodic
21 adjustment as approved by the Commission. *Id.*

1 Pursuant to RSA 53-E:7, X, the Commission initiated a rulemaking in January 2022
2 to promulgate rules to implement RSA 53-E (i.e., Docket No. DRM 21-142). On
3 October 7, 2022, the Commission filed final rules implementing the provisions of
4 RSA 53-E (the “Puc 2200 Rules”). The Commission set October 12, 2022 as the
5 effective date for the Puc 2200 Rules.

6 Among other things, the PUC 2200 Rules require each electric distribution utility to
7 propose a POR Program within 90 days of the effective date of the Puc 2200 Rules
8 (i.e., by January 10, 2023). Puc 2205.16(e). The purpose of our testimony is to
9 present the Company’s proposed POR Program in compliance with Section 9 and
10 the Puc 2200 Rules.

11 **Q. How is your testimony organized?**

12 A. Section II of our testimony presents the details of the Company’s proposed DPR
13 calculation. Section III provides detail on the mechanics of the Company’s proposed
14 POR Program. Section IV discusses UES’s proposed timeline to implement the POR
15 Program. Section V provides the conclusion to our testimony.

16 **II. DISCOUNT PERCENTAGE RATE COMPONENTS & CALCULATION**

17 **Q. What is the purpose of the proposed DPR?**

18 A. Consistent with Section 9, the DPR applies to payment of amounts due to suppliers
19 to account for the utility’s uncollectable rate and the ongoing costs to administer
20 collection efforts.

1 **Q. Is the Company proposing to offer the POR Program to all Competitive**
2 **Suppliers that choose Consolidated Billing service from the Company?**

3 A. Yes. As noted above, RSA 53-E:9 requires that each electric distribution utility
4 propose a POR Program to purchase receivables from “suppliers.” The statute
5 defines suppliers to include an aggregator functioning as a load serving entity or a
6 competitive electricity supplier serving an aggregation. RSA-E:9.I. The statute
7 further provides that the term supplier “shall also include competitive electricity
8 suppliers generally to the extent and for such customer rate classes as the
9 commission finds, after notice and hearing, that it is for the public good.” *Id.*

10 The Company proposes to offer the POR Program to all Competitive Suppliers that
11 choose Consolidated Billing service from the Company. If the Company were to set
12 up its accounting and billing processes to differentiate between Competitive
13 Suppliers serving municipal aggregations and all other Competitive Suppliers, it
14 would be overly complex and likely more expensive to implement and administer.
15 Also, offering the POR program more broadly promotes retail choice and customer
16 access to competitive markets. For these reasons, offering the POR Program to all
17 Competitive Suppliers that choose Consolidated Billing service from the Company
18 is for the public good.

1 **Q. Is the Company proposing DPRs for different customer classes?**

2 A. Yes, the Company proposes class-specific DPRs for two class groupings: (1) the
3 Residential Service Class; and (2) the General Service Class.¹

4 **Q. Why is the Company proposing DPRs for different customer classes?**

5 A. The Company is proposing DPRs for two different customer classes because of the
6 difference in uncollectible percentages that exist between the Residential Service
7 Class and General Service Class.

8 **Q. Please summarize the elements of the DPR.**

9 A. Consistent with Section 9, the DPR is comprised of three elements: the Uncollectible
10 Percentage (“UP”), the Administrative Cost Percentage (“ACP”) and the Past Period
11 Reconciliation Percentage (“PPRP”). Expressed as a formula that is: $DPR = UP +$
12 $ACC + PPRP$. We discuss each element of the DPR in the subsections that follow.

13 A. Uncollectable Percentage

14 **Q. Please describe the cost elements recovered through the UP.**

15 A. The UP is calculated for each customer class (i.e., Residential and General Service)
16 based on actual uncollectible expense data for all customers in the applicable class,
17 for the most recent period for which such data is available, divided by the total

¹ For purposes of the POR Program, the General Service Class consists of G-1, G-2, and Outdoor Lighting tariff customers.

1 amounts billed for the applicable customer class for the same period, including late
2 payment fees if included in uncollectible expense.

3 During the first year of the POR Program, the UP is calculated as the uncollectible
4 expense for the applicable customer class based on actual data for Default Service
5 Customers, divided by the total amounts billed by the Company for Default Service
6 Supply, including late payment fees if included in uncollectible expenses.

7 **Q. Please provide an estimate of the initial proposed UP.**

8 A. As shown in Exhibit CJGSED-2, Schedule 2, and summarized in the table below,
9 based on historical data for the 12-month period ending December 2021, the
10 Company estimates the following UPs:

Customer Class	UP
Residential	0.94%
General	0.26%

11 B. Administrative Cost Percentage

12 **Q. Please describe the cost elements recovered through the ACP.**

13 A. The ACP reflects the cost to implement the POR Program and the estimated costs
14 to administer collection efforts.

15 **Q. Does the Company expect to incur costs for the administration of collection
16 efforts, and if so, how did the Company determine the pro rata share of the cost
17 of administering collection efforts?**

18 A. The Company expects to leverage existing technology and utilize currently

1 employed personnel to administer the POR Program. Therefore, at this time, the
2 Company has not quantified an estimated cost for the ongoing administration of the
3 POR Program. However, the Company will regularly evaluate and track (as
4 necessary) any incremental costs directly associated with the ongoing administration
5 of the POR Program and to the extent it starts to incur such costs on a recurring
6 basis, it may seek approval from the Commission to adjust the ACP component of
7 the DPR to recover those costs. With regard to labor costs in particular, the Company
8 may propose to evaluate the inclusion of such costs as part of its next base
9 distribution rate case.

10 **Q. Is the Company proposing to include costs specific to implementation of the**
11 **POR Program in the ACP, and if so, what is the Company’s estimate for the**
12 **costs?**

13 A. Yes, UES employs a vendor to assist with Electronic Data Interchange (“EDI”)
14 transactions and UES conducts these transactions in accordance with Electronic
15 Business Transactions (“EBT”) standards. UES will need to conduct testing to
16 integrate POR data into this process. This testing will include, among other things,
17 validating file naming conventions and ensuring the data fields are correct for
18 processing properly formatted EDI files for suppliers into EBT. As shown in Exhibit
19 CJGED-2, Schedule 2, page 4, the Company estimates implementation costs of

1 \$5,250 for this data testing, which UES will conduct with the assistance of its outside
2 vendor.²

3 **Q. Please provide an estimate of the initial proposed ACP.**

4 A. As shown in Exhibit CJGED-2, Schedule 2, page 4, and summarized in the table
5 below, the Company estimates the following ACPs:

Customer Class	ACP
Residential	0.02%
General	0.02%

6 C. Past Period Reconciliation Percentage (“PPRP”)

7 **Q. Please describe the PPRP.**

8 A. The PPRP is a true-up mechanism that reconciles actual and estimated uncollectible
9 and administrative expenses.

10 **Q. Has the Company provided an illustrative example of how the PPRP will work?**

11 A. Yes, an illustrative example of how the PPRP will work for the uncollectible
12 expenses has been provided on page 1 and 2 of Exhibit CJGED-2, Schedule 4. The
13 illustrative reconciliation calculation has been provided on page 2. The calculation
14 reconciles the actual 2021 UP of 0.94% for the residential rate class to an illustrative
15 UP for 2021 of 0.93% and for the small/regular general rate class the calculation
16 reconciles the actual 2021 UP of 0.26% to an illustrative UP for 2021 of 0.23%.

² The Company’s estimated implementation cost is based on a verbal quote provided by its outside vendor. This estimate will be updated once the vendor completes and submits its formal scope of work to the Company.

1 D. Total DPR Estimate

2 **Q. Based on the illustrative UP, ACP, and PPRP, what is the Company’s**
3 **calculated DPR?**

4 A. As summarized in the table below, and as shown in Exhibit CJGED-2, Schedule 1,
5 the Company’s calculation results in the following illustrative DPRs:

	Residential	General
UP	0.94%	0.26%
ACP	0.02%	0.02%
PPRP	0.01%	0.04%
DRP	0.97%	0.32%

6

7 The initial DRPs will not include a PPRP. The PPRP has been included to
8 demonstrate how the mechanics of the calculation will work.

9 **III. POR PROGRAM MECHANICS**

10 **Q. Does the Company have experience in implementing and administering POR**
11 **Programs?**

12 A. Yes. The Company’s affiliate, Fitchburg Gas and Electric Light Company
13 (“FG&E”), has developed, implemented, and currently administers a POR Program
14 in Massachusetts. The Company was able to leverage its experience operating the
15 Massachusetts POR Program in the design of the POR Program proposed in this
16 docket.

1 **Q. What is the Company's proposal with regard to the frequency of payments to**
2 **Competitive Suppliers?**

3 A. UES will make a single monthly payment on the last Business Day of the calendar
4 month to each participating Competitive Supplier for all POR customers billed on
5 their behalf during the prior calendar month of service. The Company will pay the
6 supplier the full amounts due from Customers for Generation Service, less the DPR.

7 **Q. How will the Company treat existing receivables in the POR Program?**

8 A. The Company proposes to purchase all existing receivables upon implementation of
9 the POR Program utilizing the initial DPRs for the Residential and General customer
10 classes.

11 The amounts purchased for the existing receivables will be subject to full
12 reconciliation through the PPRP.

13 **Q. What is the Company's proposal with regard to ongoing reporting and**
14 **adjustment of the DPR?**

15 A. As noted above, Section 9 provides for periodic adjustment as approved by the
16 Commission. Accordingly, the Company proposes that the DRP be set annually for
17 effect April 1 for a 12-month period. On or about February 1 of each year, the
18 Company will make an annual reconciliation filing, providing the Commission with
19 a calculation of the DRP for the forthcoming year and documentation supporting
20 that calculation.

1 **Q. What requirements will Competitive Suppliers need to meet in order to**
2 **participate in the POR Program and receive payments?**

3 A. The relationship between Competitive Suppliers and UES is governed by a
4 Competitive Electric Supplier Trading Partner Agreement (the “TPA”) and the
5 Company’s Terms and Conditions for Competitive Suppliers tariff. The Company
6 will require Competitive Suppliers to execute a TPA to participate in the POR
7 Program and receive payments.

8 **Q. Will the Company need to amend its Terms and Conditions for Competitive**
9 **Suppliers tariff and its Competitive Supplier Trading Partner Agreement to**
10 **implement the POR Program?**

11 A. Yes. The Company will need to amend its Terms and Conditions for Competitive
12 Suppliers tariff and its Competitive Supplier Trading Partner Agreement to
13 implement the POR Program. The Company expects to file revisions to its Terms
14 and Conditions for Competitive Suppliers tariff and its Competitive Supplier
15 Trading Partner Agreement as part of this proceeding.

16 **IV. IMPLEMENTATION TIMELINE**

17 **Q. How long will it take to implement the Company’s proposed POR Program?**

18 A. The Company estimates that it will require up to four months from the
19 Commission’s final order in this proceeding to conduct the necessary testing,
20 systems evaluation and time to update the initial DPR calculation for the latest

1 information. Payments to Competitive Suppliers will not commence until the
2 completion of POR Program implementation.

3 **V. CONCLUSION**

4 **Q. Does this conclude your testimony?**

5 **A.** Yes, it does.

Illustrative Calculation of Discount Percentage Rate (DPR)

	<u>Total</u>	<u>Residential</u>	<u>General Service</u>
1 Uncollectible Percentage	0.74%	0.94%	0.26%
2 Administrative Cost Percentage	0.02%	0.02%	0.02%
3 Prior Period Reconciliation Percentage	<u>0.03%</u>	<u>0.01%</u>	<u>0.04%</u>
4 Discount Percentage Rate	0.79%	0.97%	0.32%

- (1) Schedule 2, page 1.
- (2) Schedule 2, page 4.
- (3) Schedule 3, page 1.
- (4) Sum of lines 1 + 2 + 3

Net Electric Supply Write Offs By Class⁽¹⁾

January through December 2021
Excludes Late Payments

	<u>Net Write Offs</u>
1 Residential	\$ 382,469
2 General Service & OL	<u>44,725</u>
3 Total (Page 2)	\$ 427,194

Electric Supply Revenues By Class⁽¹⁾

January through December 2021
Excludes Late Payments

	<u>Revenue</u>
4 Residential	\$ 40,627,720
5 General Service & OL	<u>17,328,339</u>
6 Total (Page 3)	\$ 57,956,059

Net Supply Write Offs / Supply Electric Revenue

	<u>%</u>
7 Residential	0.94%
8 General Service & OL	<u>0.26%</u>
9 Total	0.74%

Class Key:

Residential: D

General Service & OL: G1, G2, OL

(1) Default Service only prior to implementation of POR

Net W/Os													
Class	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total
1 Residential	\$42,430	\$16,076	\$35,570	\$20,527	\$28,690	\$11,598	\$540	\$62,968	\$54,513	\$23,234	\$31,951	\$54,370	\$382,469
2 General Service & OL	<u>3,008</u>	<u>3,566</u>	<u>302</u>	<u>949</u>	<u>(116)</u>	<u>1,283</u>	<u>17,138</u>	<u>7,019</u>	<u>5,221</u>	<u>1,748</u>	<u>2,340</u>	<u>2,266</u>	<u>44,725</u>
3 Total	\$45,437	\$19,642	\$35,873	\$21,476	\$28,574	\$12,881	\$17,678	\$69,988	\$59,734	\$24,983	\$34,292	\$56,636	\$427,194

(1) Default Service only

	Rate Class	Default Service Revenue ⁽¹⁾	External Supply Revenue ⁽²⁾	Total Revenue
1	Residential	\$ 40,627,720	\$ -	\$ 40,627,720
2	General Service & OL	<u>17,328,339</u>	<u>-</u>	<u>17,328,339</u>
3	Total	\$ 57,956,059	\$ -	\$ 57,956,059

(1) Includes Default Service, Default RPS, Default Variable and Default Variable RPS.

(2) Excluded prior to implementation of POR

Illustrative Calculation of Administrative Cost Percentage (ACP)

	<u>Total</u>
1 Estimated Administrative Cost	\$5,250
2 Total Amount Billed for Generation Service	<u>\$21,079,008</u>
3 Administrative Cost Percentage	<u>0.02%</u>

(1) Estimated Implementation Cost (refer to Exhibit CGED-1, page 8)

(2) Total Standard Complete Billing from Schedule 3, page 2

(3) Line (1) ÷ Line (2)

Illustrative Calculation of Uncollectible Expense Reconciliation Percentage (2021)

	<u>Total</u>	<u>Residential</u>	<u>Small/Regular General Service</u>
1 Uncollectible Expense Reconciliation Balance	\$7,208	\$541	\$6,667
2 Total Amounts Billed Under Standard Complete Billing	<u>\$21,079,008</u>	<u>\$5,214,464</u>	<u>\$15,864,544</u>
3 Past Period Reconciliation Percentage	0.03%	0.01%	0.04%

(1) See page 2. Based on January through December 2021 actual data.

(2) Total Standard Complete Billing from page 2.

(3) Line (1) ÷ Line (2)

RESIDENTIAL

	Beginning Balance	Standard Complete Billing Amount	Actual Uncollectible %	Actual Uncollectible Expense	Collected Uncollectible %	Collected Uncollectible Expense	Difference Actual - Collected	Ending Balance Before Interest	Average Monthly Balance	Interest Rate	Number of Days / Month	Computed Interest	Ending Balance
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
Jan-21 Act	\$0	\$412,520	0.94%	\$3,878	0.93%	\$3,836	41	\$41	\$21	7.50%	31	\$0	\$41
Feb-21 Act	\$41	\$421,128	0.94%	\$3,959	0.93%	\$3,916	42	\$83	\$62	7.50%	28	\$0	\$84
Mar-21 Act	\$84	\$417,170	0.94%	\$3,921	0.93%	\$3,880	42	\$126	\$105	7.50%	31	\$1	\$126
Apr-21 Act	\$126	\$345,975	0.94%	\$3,252	0.93%	\$3,218	35	\$161	\$144	7.50%	30	\$1	\$162
May-21 Act	\$162	\$345,369	0.94%	\$3,246	0.93%	\$3,212	35	\$196	\$179	7.50%	31	\$1	\$197
Jun-21 Act	\$197	\$459,947	0.94%	\$4,324	0.93%	\$4,278	46	\$243	\$220	7.50%	30	\$1	\$245
Jul-21 Act	\$245	\$511,813	0.94%	\$4,811	0.93%	\$4,760	51	\$296	\$270	7.50%	31	\$2	\$298
Aug-21 Act	\$298	\$440,493	0.94%	\$4,141	0.93%	\$4,097	44	\$342	\$320	7.50%	31	\$2	\$344
Sep-21 Act	\$344	\$459,174	0.94%	\$4,316	0.93%	\$4,270	46	\$390	\$367	7.50%	30	\$2	\$392
Oct-21 Act	\$392	\$420,727	0.94%	\$3,955	0.93%	\$3,913	42	\$434	\$413	7.50%	31	\$3	\$437
Nov-21 Act	\$437	\$469,600	0.94%	\$4,414	0.93%	\$4,367	47	\$484	\$460	7.50%	30	\$3	\$486
Dec-21 Act	\$486	<u>\$510,547</u>	0.94%	<u>\$4,799</u>	0.93%	<u>\$4,748</u>	<u>51</u>	\$537	\$512	7.50%	<u>31</u>	<u>\$3</u>	\$541
Total		\$5,214,464		\$49,016		\$48,495	521				365	\$19	

SMALL/REGULAR GENERAL SERVICE

	Beginning Balance	Standard Complete Billing Amount	Actual Uncollectible %	Actual Uncollectible Expense	Collected Uncollectible %	Collected Uncollectible Expense	Difference Actual - Collected	Ending Balance Before Interest	Average Monthly Balance	Interest Rate	Number of Days / Month	Computed Interest	Ending Balance
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
Jan-21 Act	\$0	\$1,298,209	0.26%	3,375	0.23%	\$2,986	389	\$389	\$195	7.50%	31	\$1	\$391
Feb-21 Act	\$391	\$1,312,364	0.26%	3,412	0.23%	\$3,018	394	\$784	\$588	7.50%	28	\$3	\$788
Mar-21 Act	\$788	\$1,319,421	0.26%	3,430	0.23%	\$3,035	396	\$1,184	\$986	7.50%	31	\$6	\$1,190
Apr-21 Act	\$1,190	\$1,254,994	0.26%	3,263	0.23%	\$2,886	376	\$1,566	\$1,378	7.50%	30	\$9	\$1,575
May-21 Act	\$1,575	\$1,256,166	0.26%	3,266	0.23%	\$2,889	377	\$1,952	\$1,763	7.50%	31	\$11	\$1,963
Jun-21 Act	\$1,963	\$1,296,450	0.26%	3,371	0.23%	\$2,982	389	\$2,352	\$2,157	7.50%	30	\$13	\$2,365
Jul-21 Act	\$2,365	\$1,301,362	0.26%	3,384	0.23%	\$2,993	390	\$2,756	\$2,560	7.50%	31	\$16	\$2,772
Aug-21 Act	\$2,772	\$1,320,977	0.26%	3,435	0.23%	\$3,038	396	\$3,168	\$2,970	7.50%	31	\$19	\$3,187
Sep-21 Act	\$3,187	\$1,428,118	0.26%	3,713	0.23%	\$3,285	428	\$3,616	\$3,401	7.50%	30	\$21	\$3,637
Oct-21 Act	\$3,637	\$1,374,542	0.26%	3,574	0.23%	\$3,161	412	\$4,049	\$3,843	7.50%	31	\$24	\$4,073
Nov-21 Act	\$4,073	\$1,377,834	0.26%	3,582	0.23%	\$3,169	413	\$4,487	\$4,280	7.50%	30	\$26	\$4,513
Dec-21 Act	\$4,513	<u>\$1,324,107</u>	0.26%	<u>3,443</u>	0.10%	<u>\$1,324</u>	<u>2,119</u>	\$6,632	\$5,572	7.50%	<u>31</u>	<u>\$36</u>	\$6,667
Total		\$15,864,544		41,248		\$34,767	6,481				365	\$186	

- (a) Column (m), previous row.
- (b) Standard Complete Billing Amount from Company's customer information system (CIS).
- (c) Schedule 2, page 1, Column (a). Based on actual January - December 2021 write-offs.
- (d) Column (b) * Column (c)
- (e) Approved Upcc
- (f) Actual discount amounts.
- (g) Column (d) - Column (f)
- (h) Column ((a) + Column (g))
- (i) (Column (a) + Column (h)) divided by two.
- (j) Rate as defined in PUC 1202.13
- (l) Columns ((i) * (j) * (k)) divided by # days in year.
- (m) Column (h) + Column (l).