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September 25, 2020

## VIA ELECTRONIC MAIL

aida.camacho@bpu.nj.gov
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Aida Camacho-Welch
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue, $9^{\text {th }}$ Floor
P.O. Box 350

Trenton, New Jersey 08625-0350

RE: In the Matter of the Petition of Atlantic City Electric Company for Approval of an Energy Efficiency Program, Cost Recovery Mechanism, and Other Related Relief for Plan Years One Through Three BPU Docket No.

In the Matter of the Implementation of P.L. 2018, c. 17 Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs BPU Docket No. QO10010040

Dear Secretary Camacho-Welch:
On June 10, 2020, the New Jersey Board of Public Utilities (the "Board" or "BPU") issued an Order directing New Jersey electric distribution companies to file petitions to implement threeyear energy efficiency ("EE") and peak demand response ("PDR") programs. ${ }^{1}$ In compliance with that directive and other relevant statutes, attached is the Certified Petition of Atlantic City Electric Company ("ACE" of the "Company") seeking Board approval of the Company’s plan to implement EE and PDR initiatives in its service territory, referred to as the "EE Program."

As proposed by ACE, the EE Program is a significant expansion of the Company's existing EE programs and initiatives and includes an incremental expenditure of nearly $\$ 99$ million over the course of the three-years beginning July 1, 2021 through June 30, 2024. The EE Program is structured as a multi-prong approach to meeting the energy use reduction goals required by the Clean Energy Act of 2018, with meaningful opportunities for all customer segments to deploy robust energy efficiency measures, while also bolstering the State's economy through investment and workforce development. As explained in detail in this Petition and supporting Direct

[^0]Aida Camacho-Welch
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Testimony and Exhibits, the EE Program is a portfolio of initiatives designed to engage ACE's residential, commercial, industrial, multi-family, and low-to-moderate income customers, and to offer a variety of EE measures - ranging from individual products and services to whole building/house solutions - with the goal of enabling customers to realize reductions in energy use in a manner tailored to meet their individual needs and circumstances.

As explained in the Company's Petition, implementation of the proposed EE Program is clearly in the public interest. ACE has demonstrated that substantial economic and environmental benefits will accrue from the Company's proposed incremental EE Program, including: 2.293 million megawatt-hours ("MWhs") of saved customer electricity use over the lifetime of the measures deployed; \$552 million of savings on customers’ electric and gas bills; the creation of 6,062 direct and indirect job-years related to the implementation of the EE measures; and the contribution of $\$ 504$ million to New Jersey's Gross Domestic Product GDP. These are real and tangible benefits to customers and the State of New Jersey that are well in excess of the nearly \$99 million ACE proposes to spend on its EE Program. Moreover, the Company has also shown that the proposed EE Program is cost-effective, providing approximately $\$ 276$ million in net benefits.

The Company's Petition is supported by the Direct Testimony and associated exhibits of several witnesses. Please note that certain schedules and Minimum Filing Requirements contain information the Company considers to be confidential. Therefore, ACE has redacted those materials and hereby files the public version of those items. Confidential versions of the redacted materials will be provided upon execution of an acceptable Agreement of Non-Disclosure.

Consistent with the Order issued by the Board in connection with In the Matter of the New Jersey Board of Public Utilities’ Response to the COVID-19 Pandemic for a Temporary Waiver of Requirements for Certain Non-Essential Obligations, BPU Docket No. EO20030254, Order dated March 19, 2020, this Petition and related documents are being electronically filed with the Secretary of the Board and the New Jersey Division of Rate Counsel. No paper copies will follow.

Thank you for your cooperation and courtesies. Feel free to contact the undersigned with any questions.


## Enclosure

## cc: Service List

IN THE MATTER OF THE PETITION OF ATLANTIC CITY ELECTRIC COMPANY FOR APPROVAL OF AN ENERGY EFFICIENCY PROGRAM, COST RECOVERY MECHANISM, AND OTHER RELATED RELIEF FOR PLAN YEARS ONE THROUGH THREE

IN THE MATTER OF THE
IMPLEMENTATION OF P.L. 2018, c. 17
REGARDING THE ESTABLISHMENT OF ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION PROGRAMS

STATE OF NEW JERSEY

## BOARD OF PUBLIC UTILITIES

 BPU DOCKET NO. CERTIFIED PETITION ${ }^{1}$BPU DOCKET NO. QO19010040

ATLANTIC CITY ELECTRIC COMPANY ("ACE" or the "Company"), a corporation organized and existing under the laws of the State of New Jersey, which is subject to the jurisdiction of the New Jersey Board of Public Utilities (the "Board" or "BPU"), and which maintains a regional office at 5100 Harding Highway, Mays Landing, New Jersey 08330, respectfully petitions the Board pursuant to N.J.S.A. 48:2-21, N.J.S.A. 48:2-21.1, N.J.S.A. 48:387.8 et al., N.J.S.A. 48:3-98.1, and any other order, statute or regulation the Board deems applicable, as follows:

## I. INTRODUCTION AND OVERVIEW OF REQUEST

1. ACE is a public utility engaged in the transmission and distribution of electric energy for light, heat, and power to residential, commercial, and industrial customers. The Company's service territory comprises eight counties located in southern New Jersey and includes over 560,000 customers. ACE is a wholly owned subsidiary of Pepco Holdings LLC ("PHI"), a

[^1]limited liability company organized and existing under the laws of the State of Delaware. PHI is, in turn, a subsidiary of Exelon Corporation ("Exelon"). ${ }^{2}$
2. The Board has jurisdiction over ACE for the purposes of setting ACE's retail distribution rates, and to assure the provision of safe, adequate, and proper electric distribution service. ${ }^{3}$
3. With this filing, ACE seeks approval of its Energy Efficiency Program Plan (the "EE Program") and related cost recovery mechanism. The Company’s EE Program includes nearly $\$ 99$ million in incremental spending on an array of robust energy efficiency ("EE") measures. As will be discussed throughout this filing, the EE Program has been prepared with significant input from a comprehensive public stakeholder process, and is in compliance with the Board's recent Order ${ }^{4}$ implementing provisions of the Clean Energy Act of 2018 (the "CEA"), ${ }^{5}$ as well as N.J.S.A. 48:3-98.1 (the "RGGI Act"). ${ }^{6}$
4. Currently, the Company funds two EE programs through a $\$ 15$ million contribution from Exelon: the OPower Home Energy Report ("Home Energy Report") and the Quick Home Energy Check-Up. The Home Energy Report is an initiative that provides residential customers with information about their energy consumption for the purpose of changing customer behavior

[^2]to reduce energy use. The Quick Home Energy Check-Up is a program to provide residential customers with free home energy audits that include a report identifying energy-saving opportunities, as well as the installation of energy-saving devices. These programs have been operating for several years and have been funded by $\$ 15$ million provided by Exelon as a direct benefit of the merger of Exelon and PHI. ${ }^{7}$ As a merger benefit, the $\$ 15$ million has not been recovered in rates, and will not be recovered in rates in the future. To be clear, the EE Program proposed in this filing is in addition to the existing merger-funded EE programs. The Company estimates that merger-related funding will remain to be spent during approximately PY1. The Company's intention is to continue with the two EE initiatives discussed above, as previously approved by the Board, until the merger-related funding is exhausted. At that time, the Company will continue to fund these activities but will do so through the incremental EE Program. ACE notes, however, that these two programs are not sufficient to meet the ambitious energy-savings targets set by the Board in the CEA and the EE Order, and that the Company must implement a more comprehensive suite of programs to achieve those goals.
5. In order to meet the energy-savings targets determined in the EE Order, ACE has developed and proposed the EE Program which provides for a significant expansion of the Company's existing EE programs and initiatives, and includes an incremental expenditure of nearly \$99 million over the course of Plan Years ("PY") one to three (i.e., the period July 1, 2021 through June 30, 2024). As proposed, the EE Program includes a wide array of new EE programs,

[^3]products, and services geared to engaging all sectors of the Company's customers in implementing energy-saving measures.
6. Upon the Board's approval of the requests made in this proceeding, it is the Company's intention to consolidate its existing merger-funded EE programs with the EE Program. The Company believes this approach will allow ACE to better administer and track the success of EE initiatives going forward. While the programs will be consolidated, the funding sources will be tracked separately. That is, merger dollars will be tracked separately from funds collected via the proposed cost recovery surcharge discussed below.
7. In addition to approval of the plan to implement the EE Program, the Company requests approval of a cost recovery mechanism. Specifically, ACE requests authority to create a regulatory asset to capture the incremental capital investment costs related to the EE Program, and to implement a Rider EE. Rider EE will be set annually based upon budgeted and actual expenditures through annual filings, subject to Board approval. The revenue requirement recovered through Rider EE is designed to recover the annual depreciation and amortization of capital investments, plus carrying costs, and annual operations and maintenance ("O\&M") expenses, as well as a true-up for any prior period over/under recovery. ACE estimates the Rider EE bill impact for a typical residential customer on BGS service using 679 kilowatt-hours (" $k W h$ ") per month will be an increase of $\$ 0.30$ cents or $0.23 \%$, from $\$ 132.16$ to $\$ 132.46$ for the first year of the EE Program. ACE also seeks the Board's approval of a modified Conservation Incentive Plan ("CIP") calculation methodology to recover a portion of the Company's revenues that will be lost as a result of the successful implementation of the EE Program and the related decrease in energy sales. ${ }^{8}$ As will be discussed below, approval of the CIP aligns the Company's interests

[^4]with those of customers and the State. In this proceeding, ACE has provided an illustrative model of how it would calculate the CIP, and seeks the Board's approval of that proposed methodology. No CIP rate impacts have been identified at this time.
8. ACE will demonstrate that substantial economic and environmental benefits will accrue from the Company's proposed incremental EE Program. Indeed, Company Witness Baatz has estimated that ACE's incremental $\$ 99$ million investment in the EE Program will yield multiple benefits including: 2.293 million megawatt-hours ("MWhs") of saved customer electricity use over the lifetime of the measures deployed; \$552 million of savings on customers' electric and gas bills; the creation of 6,062 direct and indirect job-years related to the implementation of the EE measures; and the contribution of $\$ 504$ million to New Jersey’s Gross Domestic Product ("GDP"). These are real and tangible benefits to customers and the State of New Jersey that are well in excess of the nearly $\$ 99$ million ACE proposes to spend on its EE Program.
9. ACE has structured its EE Program based on the Board's EE Order and the Company's ongoing participation in several working and stakeholder groups. The Company has attempted to size its EE Program request to position the Company to meet the required energy reduction targets for each PY, when combined with the merger-funded programs, while also being mindful of the near-term customer rate impacts associated with incremental EE Program investments. ACE has proposed a strong EE Program, and is confident that its EE Program will provide significant environmental and economic benefits.

Efficiency ("CEF-EE") Program on a Regulated Basis, BPU Docket Nos. GO18101112 and EO18101113, Order Adopting Stipulation (dated September 23, 2020), at 16-21.
10. As proposed by the Company, the EE Program is a multi-prong approach to meeting the energy use reduction goals required by the CEA, with meaningful opportunities for all customer segments to deploy robust energy efficiency measures, while also bolstering the State's economy through investment and workforce development. As explained in detail in this Petition and supporting Direct Testimony and Exhibits, the EE Program is a portfolio of initiatives designed to engage ACE's residential, commercial, industrial, multi-family, and low-to-moderate income ("LMI") customers, and to offer a variety of EE measures - ranging from individual products and services to whole building/house solutions - with the goal of enabling customers to realize reductions in energy use in a manner tailored to meet their individual needs and circumstances.
11. Consistent with the Board's EE program objectives, ACE's EE Program seeks to remove or limit common obstacles to deployment of EE measures, with an emphasis on trying to eliminate barriers experienced by LMI customers, customers residing in rental housing, and small businesses, through expanded education and outreach efforts and financial mechanisms such as rebates and $0 \%$ interest loans. These measures, along with other EE Program features described in this filing, support key objectives set out by the Board when devising New Jersey's transition to EE, including: providing access to EE programs for all market segments; decreasing energy burdens for all customers (with an emphasis on LMI customers and environmental justice communities); and providing LMI communities with access to the benefits of EE investments. ${ }^{9}$
12. Implementation of the EE Program is clearly in the public interest. Reducing energy use across all segments of the economy is a key component in New Jersey's transition to $100 \%$ clean energy by 2050 as set out in the 2019 Energy Master Plan ("EMP"), and supported by

[^5]the CEA, the RGGI Act, and the Board's recent EE Order. ${ }^{10}$ Indeed, the Board concluded that "New Jersey's next generation of EE will play a central role in rising to meet the challenge of the climate crisis while providing significant benefits to residents and businesses throughout the state and growing a clean energy workforce." ${ }^{11}$ Moreover, implementation of the EE Program will yield benefits that far exceed the cost(s) of the Program. As explained in detail by Company Witness Baatz, the EE Order requires ACE to evaluate the cost-effectiveness of its proposed portfolio of EE Program initiatives using a series of prescribed tests. Company Witness Baatz performed that analysis and quantified approximately $\$ 276$ million in net benefits, resulting in a cost benefit ratio of 3.78. Clearly, the Company’s EE Program is a good investment for both customers and the State of New Jersey.

## II. BACKGROUND

13. Since the passage of the RGGI Act well over a decade ago, New Jersey electric and gas public utilities have been permitted to provide, and invest in, energy efficiency and energy conservation programs in their individual service territories. ${ }^{12}$ Importantly, following Board approval, electric and gas public utilities have also been permitted to obtain recovery of EE program costs and investments through regulated rates, including inclusion in rate base with a return on equity or other incentives and rate mechanisms. ${ }^{13}$ The passage of the CEA and the

[^6]release of the EMP have only further emphasized the importance of EE issues to the State's energy future as New Jersey transitions to a clean energy economy.
14. On May 23, 2018, Governor Murphy signed the CEA into law. ${ }^{14}$ As characterized by the Board:

The Act calls for a significant overhaul of New Jersey's energy systems while growing the economy, building sustainable infrastructure, creating well-paying local jobs, reducing carbon emissions, and improving public health to ensure a cleaner environment for current and future residents. The CEA plays a key role in achieving the State's goal of $100 \%$ clean energy by 2050 by establishing aggressive energy reduction requirements, among other clean energy strategies. This action by the Governor came at a critical time in our global fight against climate change and set New Jersey on a path to once again be a leader in charting a course towards a greener future. ${ }^{15}$
15. On June 10, 2020, the Board issued its EE Order containing a detailed and comprehensive strategy for the implementation of the EE targets authorized by the CEA, and for the transition to EE program investment and implementation by both the State and public utilities. ${ }^{16}$ The Board determined that utilities should administer a suite of core programs that would be available throughout the State. ${ }^{17}$ The Board also concluded that utilities should be required to propose peak demand reduction ("PDR") programs. ${ }^{18}$ Further, the EE Order set out those programs and initiatives that will be State-led, and directed that the Comfort Partners program be co-managed by the State and the utilities. ${ }^{19}$ In addition, the EE Order set costs to

[^7]achieve guidelines for utility core programs at the portfolio level, and required that utilities justify proposed costs that vary from the established costs to achieve guidelines by more than $10 \% .^{20}$ The Board also adopted a comprehensive list of Minimum Filing Requirements ("MFRs"), and directed that utilities make EE program filings no later than September 25, 2020, for approval by the Board by May 1, 2021 and implementation beginning July 1, 2021. ${ }^{21}$ The instant filing has been made in compliance with that requirement by the Board, as well as pursuant to the RGGI Act and the May 2008 RGGI Order.
16. In addition to direction on EE program administration and implementation, the Board's EE Order set company-specific energy use reduction targets as required pursuant to the CEA. ${ }^{22}$ In the case of ACE, the Board ordered a PY2 energy use reduction target of $0.74 \%$, increasing to $0.97 \%$ in PY3, $1.21 \%$ in PY4, and $1.44 \%$ in PY5. ${ }^{23}$ The Board also set energy use reduction targets for State-administered programs, and calculated total overall targets for each utility. ${ }^{24}$
17. On August 24, 2020, the Board issued an Order adopting the New Jersey Cost Test to be applied to all EE program filings, and noted it is "the primary benefit-cost test for the purposes of evaluating EE and PDR programs proposed and implemented pursuant to the Clean

[^8]Energy Act. ${ }^{25}$ As required, the Company has subjected its portfolio of EE initiatives to the New Jersey Cost Test and demonstrated that they are cost-effective pursuant to that key standard.

## III. ACE'S EE PROGRAM PROPOSAL

## A. Procedural Matters

18. As stated above, the Company's EE Program is being filed pursuant to the RGGI Act and the May 2008 RGGI Order, and in compliance with the EE Order. As required by the May 2008 RGGI Order, the Company has met with the Staff of the Board and with the Division of Rate Counsel ("Rate Counsel") at least 30 days in advance of this filing to discuss the EE Program, the proposed cost recovery mechanism, and the MFRs to be included with this filing. Upon the filing of this Petition, Staff will have 30 days to determine if this Petition is administratively complete, and to so advise ACE in writing. Once a Petition has been deemed administratively complete, the Board has allotted 180 days to review and approve the filing. Following these time periods will result in the Board issuing an order consistent with the review schedule in the EE Order.

## B. EE Program Groupings

19. As described in the Direct Testimony of Company Witnesses Slaten and Ellis and the Direct Testimony of Company Witness Baatz, the EE Program is composed of a suite of program offerings designed to provide energy savings opportunities to all customers and energy end uses in ACE's service territory. The EE Program includes two groups of initiatives as required in the EE Order: Core and Utility-Led. The Core programs were informed by significant input from an extensive public stakeholder process. The Core programs were designed in coordination

[^9]with the Staff of the Board and the other New Jersey electric and gas utilities, and build on the successes of the Division of Clean Energy programs while including enhancements to grow energy savings and optimize program design. The ACE-led initiatives include programs that are specific to the Company's service territory, and will offer customers additional opportunities to save energy. ACE notes that many of these programs were developed in close coordination with other utilities to ensure consistency in programs and reduce marketplace confusion among customers and contractors. The combination of these two program groupings, along with existing programs, will put the Company on the path to achieving the EE Order energy reduction targets.

## C. EE Program Design Goals and Description

20. When designing the EE Program and selecting individual programs to be included in each of the two program groups, ACE was guided by three primary goals. First, meeting the energy savings targets contained in the EE Order. Second, meeting the Board's important public policy goals of providing broad-based access to EE measures for all customers, with an emphasis on ensuring meaningful access by LMI customers and communities, promotion of emerging technologies, workforce and economic development, and achieving cost-effective energy and peak demand reductions. And third, meeting the needs of all customer segments and classes including residential, commercial, industrial, multi-family, and LMI customers. As Company Witness Baatz notes, by including a wide array of EE programs (reflecting various levels of incentives and costsupport mechanisms) ranging from single products or services to whole house/building solutions, ACE can provide multiple pathways for all customers to implement EE measures in a costeffective and equitable manner.
21. A detailed description of the numerous subprograms proposed as part of the EE Program, including specific information about their design, costs, target market, delivery
approach, measures and other details, is included in the Direct Testimony of Company Witness Baatz as Exhibit BJB-2.

## D. EE Program Energy Savings Targets

22. ACE has calculated the specific MWh savings targets for each PY consistent with the energy savings percentages set by the Board for the Company in the EE Order. While the Board did not set an energy savings target for PY1, the Company has included one below to reflect fully the savings targets the EE Program is designed to meet during the PY1 to PY3 period. Company Witness Baatz provides additional information about the savings targets and the calculation of savings targets in MWhs.

## ACE Savings Targets

| Program Year |  | Target (\%) |  |
| :--- | :--- | :--- | :--- |
| PY1 |  | Target (MWh) |  |
| PY2 | $0.38 \%$ | 33,017 |  |
| PY3 | $0.74 \%$ | 62,552 |  |
|  | $0.97 \%$ | 81,490 |  |

## E. EE Program Cost-Benefit Analysis and Benefits

23. The MFRs mandated pursuant to the EE Order and the NJ Test Order necessitate that utilities complete a comprehensive cost-benefit analysis using six specific cost-benefit tests, including the New Jersey Cost Test. ACE has engaged Gabel Associates to assist in this matter. Company Witness Baatz (of Gabel Associates) prepared the required cost-benefit analysis. In that analysis, he demonstrated that the EE Program is cost-effective and will provide significant benefits to customers and the State of New Jersey. Specifically, Company Witness Baatz found that the EE Program portfolio was cost-effective under several tests, including the New Jersey Cost Test which the Board concluded was the "primary benefit-cost test for the purposes of
evaluating EE and PDR programs." ${ }^{26}$ Indeed, Company Witness Baatz states that the three-year EE Program portfolio resulted in net benefits of $\$ 276$ million and a cost-benefit ratio of 3.78. Put another way, this result indicates that, for every dollar ACE spends on the EE Program, customers will receive $\$ 3.78$ in benefits.
24. The EE Program supports the State's important public policy objectives as reflected in the EMP, the CEA and the RGGI Act by: (1.) reducing energy consumption, thereby lowering the utility bills of participating customers; (2.) reducing harmful greenhouse gas emissions, thereby creating environmental benefits and fighting climate change; and (3.) bolstering economic investment and workforce development, thereby helping New Jersey's economy and its transition to a clean energy future. To illustrate the scope of the environmental benefits created, Company Witness Baatz estimated the EE Program will reduce carbon dioxide emissions by approximately 1.5 million tons, sulfur dioxide emissions by 885 tons, and nitrogen oxide emissions by 783 tons. The displacement of these emissions will avoid human health and environmental harms, thereby providing additional benefits to ACE's customers. As for investment and workforce development, Company Witness Baatz estimated the EE Program will generate extensive economic activity and will spur job creation due to the millions of dollars being injected into New Jersey's economy in the form of investments and additional spending due to reduced utility bills. Based upon his analysis of the economic value added to New Jersey's GDP, Mr. Baatz estimated that the EE Program will increase New Jersey's GDP by $\$ 504$ million over the lifetime of the energy efficiency measures installed. This is vitally important as New Jersey faces the challenges of rebuilding from the economic contraction caused by the COVID-19 pandemic. Approving these programs will not only reduce customers' energy bills and improve the environment, but it will also help place New
[^10]Jersey as a leader in the development of a clean energy economy and assist in expanding economic output at a vitally important time for the State's citizens.

## F. Costs to Achieve

25. ACE has examined the Board's target ranges for costs to achieve for utilityadministered programs and compared them to the Company's projected costs for the EE Program. As explained by Company Witness Baatz, EE Program costs to serve commercial, industrial, and multi-family customers are well within the Board's identified range of reasonable costs to achieve. With respect to the costs to achieve the Company's residential EE Program, they exceed the Board's cost guidelines by approximately 45\%. Pursuant to the EE Order, when proposed costs to achieve exceed the set guidelines by more than $10 \%$, the proposing utility is required to provide justification for the added cost, necessitating that the Company provide further justification for the costs of its residential program. ${ }^{27}$
26. As an initial matter, the Board has not made available the derivation of its costs to achieve guidelines beyond indicating they are based on EE program portfolios from Massachusetts and Rhode Island - two states with EE initiatives that are significantly more mature than the current state of EE programs in New Jersey. While New Jersey, Massachusetts, and Rhode Island all have similar energy savings targets, Massachusetts and Rhode Island have the benefit of being further along on the learning curve as to how those targets can be met cost-effectively. New Jersey does not yet have the benefit of that experience, making cost comparisons, even with the $10 \%$ band, less valid.
27. With respect to ACE's residential programs specifically, the Company notes that the EE Program offerings serving those customers were expressly designed to build on the

[^11]currently offered Division of Clean Energy programs but with modifications to achieve deeper, longer lasting savings. By focusing on the first-year costs to achieve, even with the $10 \%$ band, the cost to achieve metrics do not accurately capture the long-term focus or impact of the Company's proposals. Moreover, the programs have been demonstrated to be cost-effective based on the New Jersey Cost Test - the gold standard the Board has set for evaluating EE and PDR programs. Therefore, the Company strongly believes the proposed costs to achieve and the EE Program serving residential customers are reasonable and should be approved.

## IV. ACE'S EE PROGRAM COST RECOVERY PROPOSAL

28. In order to implement its EE Program, the Company will incur a variety of costs including capital investment costs and O\&M costs. These costs are described in detail in the Direct Testimony of Company Witness Normand. ACE proposes to recover the incremental investment and O\&M costs associated with, or created by, the proposed EE Program. With respect to incremental investment costs, the Company proposes to capitalize those amounts as a regulatory asset and to amortize them over a 10 year period consistent with the EE Order. ${ }^{28}$ The annual amortization amounts will be allocated by month using the projected monthly kWh sales as a percentage of the total projected kWh sales for the year. Projected system-related capital expenditures are modeled to close to Property, Plant and Equipment at the inception of the EE Program and will be amortized and recovered over a period of five years, consistent with guidelines for Intangible Plant. The incremental O\&M costs will be expensed and included within the cost recovery mechanism model for recovery on an annual basis. In addition, the Company requests recovery of $\$ 577,310$ in program planning costs associated with the research and development of the EE Program.

[^12]29. As permitted in the EE Order, the Company seeks to earn a return on the unamortized balance of the incremental investment costs. The Company's currently authorized rate of return is $7.08 \%$ ( $6.44 \%$ after-tax), which was set in ACE's most recent base rate case. ${ }^{29}$
30. As the Board has directed in its EE Order, a significant degree of collaboration and coordination among electric and gas utilities is necessary to ensure EE programs are provided in a cost-effective manner. This is particularly relevant when the service territories of electric and gas utilities overlap - creating the potential for utilities to target the same customers. Such situations can create customer confusion and inefficiencies and need to be addressed in a consistent and logical manner. For example, some projects may involve the installation of dual fuel measures that will produce both electric and gas savings, while other projects will involve the installation of both electric and gas EE measures but are more efficient and easier for the customer if done through one utility. To address these situations, the utilities have jointly contracted a Program Coordinator to evaluate the utility investment for these shared projects and allocate any dual fuel savings to the appropriate electric or gas utility. The rebates/incentives will be shared among the electric and gas utilities in the service territory based on the allocation of electric to gas savings as determined by the Program Coordinator. For cost savings reimbursements received from another utility, the Company will reduce its investment to be recovered on a prospective basis. For cost savings reimbursements paid to another utility, the Company will increase its investment to be recovered on a prospective basis. There are no cost sharing arrangements related to O\&M expenses recovered on an annual basis. Additional details regarding the mechanics of sharing

[^13]investment costs (including financing costs) and benefits between utilities may be found in the Direct Testimony of Company Witness Normand.
31. The Company proposes to implement a Rider EE surcharge designed on a dollar per kWh basis, which would be applicable to all rate schedules. The Company estimates that a typical residential customer on BGS service using 679 kWh per month would see a bill increase of $\$ 0.30$ cents or $0.23 \%$, from $\$ 132.16$ to $\$ 132.46$ for the first year of the EE Program. A complete bill impact analysis for all Rate Schedules for PY1 through PY3 is set forth in Company Witness Normand's Schedule (MTN)-2. Rate impacts, however, will be mitigated by the beneficial impacts of the energy efficiency measures on the cost of electricity overall, as quantified in detail by the benefit/cost analysis of Company Witness Baatz, as well as customer decisions to implement EE measures.
32. Rider EE will be set annually based upon budgeted and actual expenditures through annual filings, subject to Board approval. The revenue requirement is designed to recover the annual depreciation and amortization of capital and investments, plus carrying costs at the Board approved rate of return, and annual O\&M expenses (net of cost sharing reimbursements) and a true-up for any prior period over/under recovery. See Company Witness Normand’s Schedule (MTN)-1 for a detailed calculation.
33. ACE also proposes that any differences between the forecasted monthly revenue requirement and the actual monthly EE related sales revenue will be tracked as a deferred balance (regulatory asset or regulatory liability). ACE is requesting that monthly interest be applied to any over/under recovery deferral balances based on the Company's short-term debt rate which is associated with the monthly weighted average of commercial paper issued. If no short-term debt is outstanding, ACE would propose to use the rate on equivalent temporary cash investments. The
interest will not exceed ACE's overall rate of return as authorized by the Board in the Company's most recent base rate case. Additionally, the calculation will be based on the net of tax beginning and ending average monthly balance. The Company also proposes to continue accruing simple interest with an annual roll-in at the end of each reconciliation period.
34. ACE proposes that rates be adjusted annually to reflect investments made, O\&M costs incurred, and any prior period under/over recovery. The Company has prepared a schedule pursuant to which it would make its annual rate adjustment filings by March 1 of each year, with provisional rates effective on July 1 thereafter.
35. The EE Order acknowledges that a necessary consequence of the implementation of EE and PDR measures is that customer's kWh usage and peak kW demand will decline and so too will utility revenues. Declining revenues are problematic, however, for utilities that typically recover a significant portion of their fixed costs through volumetric rates. In order to align the interests of utilities and customers, the Board authorized utilities to seek lost revenue recovery via either a lost revenue adjustment mechanism or a modified CIP.
36. ACE has considered the options presented by the Board and elected to propose a CIP mechanism. The CIP will create an adjustment to customers' bills that is designed to reflect the differences between Board-approved base distribution revenue levels and actual base distribution revenues. The Company's proposal provides for a matching of revenues with the corresponding amounts that the Board has approved as adequate compensation for providing electric service. ACE believes the CIP complements the Company's overall approach to cost recovery by enabling ACE to increase energy efficiency investments, while also reducing customers' sales and demands. ACE proposes that the CIP apply to rate schedules RS, MGS Secondary, MGS Primary, AGS Secondary, AGS Primary, and TGS, but that it would not be
applicable to rate schedules DDC, TS, SPL, and CSL. Company Witness Normand provides a detailed discussion of the proposed calculation methodology for the CIP and an illustrative CIP calculation showing the format and necessary calculations required to model the CIP and any associated deferrals for future CIP deferral recovery filings. In addition, Mr. Normand discusses several important customer safeguards that will be in place to ensure the CIP operates fairly and appropriately.

## V. TIMING OF THIS FILING

37. By way of an Order dated September 23, 2020, Board President Joseph Fiordaliso was designated as the presiding commissioner for EE filings made by the electric public utilities, including ACE. ${ }^{30}$ Given the substantial benefits to customers and the State of New Jersey, ACE requests that President Fiordaliso set a procedural schedule promptly to facilitate the exchange of information, with the goal of permitting the parties to engage in settlement efforts. ACE is hopeful that the parties can reach a mutually satisfactory settlement in early 2021, thereby enabling the Company to plan for the commencement of work on July 1, 2021.
38. The Company acknowledges that public comment hearings are required in this matter. Due to the on-going COVID-19 pandemic, the Company respectfully requests that the Board authorize the use of either in-person public comment hearings or telephone public comment hearings in this matter. Should COVID-19 gathering restrictions remain in place, telephone public comment hearings will enable the public to participate in the hearings by monitoring and/or speaking at the hearings from the safety of their homes, while also adhering to required physical distancing practices. Neighboring states, such as Pennsylvania, regularly use telephone public

[^14]comment hearings, and the Board has authorized their use in some proceedings. Use of telephone public comment hearings in this matter will allow for safe public participation and timely processing of this case: they are clearly in the public interest.

## VI. SUPPORTING TESTIMONY AND MINIMUM FILING REQUIREMENTS

39. The EE Program addressed in this Petition is supported by the Direct Testimony and supporting schedules of the following witnesses for the Company, each of which is attached hereto and made a part hereof:

Marissa Slaten and $\qquad$ EE Program Overview and Summary of Filing William Ellis

Brendon Baatz........................EE Program Descriptions, Details, Costs \& Benefits, and
Gabel Associates Cost-Effectiveness

Michael Normand $\qquad$ Cost Recovery, Rate Design, and Bill Impacts
40. A table identifying each MFR and its location within this Petition is provided in Exhibit A, attached hereto.
41. During the course of this proceeding, ACE will submit any confidential, proprietary or competitively sensitive information not covered by privilege once a mutually agreed-upon Agreement of Non-Disclosure (herein, the "NDA") has been executed by and among the Company, Board Staff, Rate Counsel and its and/or their consultants, and any permitted intervenors. A form of NDA that is consistent in form and substance with NDAs used in prior cases filed by ACE will be provided under separate cover to counsel for the parties.

## VII. NOTICE

42. Notice of this filing, including a statement of the overall impact thereof on customers of the Company, will be combined with notice of the date and times of the public comment hearings to be scheduled thereon, and will appear in newspapers published and/or in
general circulation in ACE's service area, after the date and times of such public comment hearings have been scheduled. Said notice will also be served by mail upon the municipal clerks and County representatives within the Company's service territory, as required by law. Such notice will be duly mailed following the scheduling of the hearings and will be substantially in the form of the notice attached hereto as Exhibit C. Information regarding this filing will also be posted on the Company's website and a reference to the hearings will be available on ACE's social media outlets, including Facebook and Twitter. In addition, ACE's monthly invoices will contain a bill message referring customers to the Company's "Public Postings" page where the full text of the public notice can be found.
43. Notice of this filing along with all testimony, schedules, Exhibits, and attachments (as appropriately redacted), shall be sent to the assigned Deputy Attorneys General at the Department of Law and Public Safety, and to the Director of the Division of Rate Counsel by electronic mail only. Electronic copies of the Petition, along with all testimony, schedules, Exhibits, and attachments, shall be sent to the persons identified in the Service List attached hereto. This is consistent with the Order issued by the Board in connection with In the Matter of the New Jersey Board of Public Utilities' Response to the COVID-19 Pandemic for a Temporary Waiver of Requirements for Certain Non-Essential Obligations, BPU Docket No. EO20030254 (March 19, 2020).

## VIII. COMMUNICATIONS

44. Communications and correspondence concerning this proceeding should be sent to the following representatives of the Company:

Philip J. Passanante, Esquire
Assistant General Counsel
Atlantic City Electric Company - 92DC42
500 North Wakefield Drive
P.O. Box 6066

Newark, Delaware 19714-6066
Telephone: 302.429.3105 (Delaware)
Telephone: 609.909.7034 (Trenton)
Telephone: 302.853.0569 (Mobile)
E-Mail: philip.passanante@pepcoholdings.com
And
Heather Hall
Manager, New Jersey Regulatory Affairs
Atlantic City Electric Company - 92DC42
500 North Wakefield Drive
P.O. Box 6066

Newark, Delaware 19714-6066
Telephone: 302.451.5323
E-Mail: heather.hall@pepcoholdings.com

## IX. CONCLUSION

WHEREFORE, for all of the foregoing reasons, Atlantic City Electric Company respectfully requests that the Board retain jurisdiction of this matter and expeditiously issue an Order finding that:
A. the Company's Energy Efficiency Program Plan is in the public interest;
B. the Company's plan to implement the Energy Efficiency Program, as described in this Petition and supporting Direct Testimony and Exhibits, is reasonable and prudent;
C. ACE is authorized to implement and administer its Energy Efficiency Program Plan as described in detail herein;
D. the cost recovery proposal including Rider EE and the CIP calculation methodology set forth in this Petition will provide for the implementation of just and reasonable rates, and are approved as proposed; and
E. granting such other and further relief as the Board may determine to be reasonable and appropriate.

Dated: September 25, 2020
Respectfully submitted,
ATLANTIC CITY ELECTRIC COMPANY


500 North Wakefield Drive
P.O. Box 6066

Newark, Delaware 19714-6066
Telephone: 302.429.3105 (Delaware)
Telephone: 609.909.7034 (Trenton)
Telephone: 302.853.0569 (Mobile)
E-Mail: philip.passanante@pepcoholdings.com

IN THE MATTER OF THE PETITION OF ATLANTIC CITY ELECTRIC COMPANY FOR APPROVAL OF AN ENERGY EFFICIENCY PROGRAM, COST RECOVERY MECHANISM AND OTHER RELATED RELIEF FOR PLAN YEARS ONE THROUGH THREE

IN THE MATTER OF THE
IMPLEMENTATION OF P.L. 2018, c. 17
REGARDING THE ESTABLISHMENT OF ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION PROGRAMS

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

BPU DOCKET NO. $\qquad$

GPU DOCKET NO. QO19010040

## CERTIFICATION IN SUPPORT OF PETITION

KEVIN M. McGOWAN, of full age, certifies as follows:

1. I am Vice President of Regulatory Policy and Strategy of and for Atlantic City Electric Company ("ACE"), the Petitioner named in the foregoing Petition. I am duly authorized to make this Certification on ACE's behalf.
2. I hereby certify that I have read the Petition and the supporting documents thereto and find them to be true and correct to the best of my knowledge, information, and belief.
3. I further and finally certify that the foregoing statements made by me are true. I am aware that, if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: September 25, 2020


KEVIN M. McGOWAN

## Exhibit A

## Minimum Filing Requirements

| Minimum Filing Requirements |  |  |  |
| :---: | :---: | :---: | :---: |
| MIMIMUM FILING REQUIREMENTS FOR PETITIONS UNDER N.J.S.A. 48:3-98.1 |  | Location in Filing | Page Number or Specific Location |
| I. General Filing Requirements |  |  |  |
| I.a. | The utility shall provide with all filings, information and data pertaining to the specific program proposed, as set forth in applicable sections of N.J.A.C. 14:1-5.11 and N.J.A.C. 14:1-5.12. | 1) Petition <br> 2) Financial Information: <br> Exhibit B-1 (3-Year Balance Sheets) <br> Exhibit B-2 (3-Year Income Statements) <br> Exhibit B-3 (Balance Sheet, June 2020) <br> Exhibit B-4 (3-Year Revenue by Class) <br> Exhibit B-5 (3-Year Affiliate Transactions) <br> Exhibit B-6 (Consolidated Tax Adjustment) (Confidential) <br> 3) Schedule (MTN)-4 (Proposed EE RiderTariff) <br> 4) Schedule (MTN)-5 (Proposed CIP Rider Tariff) | 1) Paragraphs 3-38 |
| I.b. | All filings shall contain information and financial statements for the proposed program(s) in accordance with the applicable Uniform System of Accounts that is set forth in N.J.A.C. 14:1-5.12. The utility shall provide the accounts and account numbers that will be utilized in booking the revenues, costs, expenses, and assets pertaining to each proposed program so that they can be properly separated and allocated from other regulated and/or other programs. | 1) Schedule (MTN)-1 (Income Statement, Balance Sheet and Return on Rate Base) <br> 2) Exhibit B-7 (Journal Entries) | 1) 18-20 (last 3 pages) |
| I.c. | The utility shall provide supporting explanations, assumptions, calculations, and work papers as necessary for each proposed program and cost recovery mechanism petition filed under N.J.S.A. 48:3-98.1. The utility shall provide electronic copies of such supporting information, with all inputs and formulae intact, where applicable. | 1) Direct Testimony of Brendon J. Baatz <br> 2) Schedule (BJB)-3 <br> 3) Direct Testimony of Michael T. Normand <br> 4) Schedule (MTN)-1 (Cost Recovery Mechanism) | 3) 3-11 <br> 4) All pages |
| I.d. | The filing shall include testimony supporting the petition, including all proposed programs. | 1) Direct Testimony of Marisa Slaten <br> 2) Direct Testimony of Brendon J. Baatz <br> 3) Direct Testimony of Michael T. Normand |  |
| I.e. | For any proposed program, the utility shall be subject to the requirements in this and all subsequent Sections. If compliance with Section V of these requirements would not be feasible for a particular program or sub-program, the utility may request an exemption but must demonstrate why such exemption should be granted. Examples of historical situations that have qualified for exemption include programs that had an educational rather than equipment-based focus and programs that introduced novel ideas where documentation supporting estimated costs/benefits may not be easily produced. | 1) not applicable <br> 2) Direct Testimony of Marisa Slaten | 2) 16-17 |
| I.f. | If the utility is filing for an increase in rates, charges, etc. or for approval of a program that may increase rates/changes to ratepayers in the future, the utility shall include a draft public notice with the petition and proposed publication dates. | 1) Exhibit C-Public Notice |  |
| II. Program Description |  |  |  |
| II.a. | The utility shall provide a detailed description of each proposed program for which the utility seeks approval, including, if applicable: | 1) Schedule (BJB)-2 | 1) 9-68 |
| II.a.i. | Program description/design | 1) Schedule (BJB)-2 | $\begin{aligned} & \text { 1) 10-12, 18, 23, 28, 33-34, 41, 45, 51, 55, } \\ & 61 \end{aligned}$ |


| MIMIMUM FILING REQUIREMENTS FOR PETITIONS UNDER N.J.S.A. $48: 3-98.1$ |  | Location in Filing | Page Number or Specific Location |
| :---: | :---: | :---: | :---: |
| II.a.ii. | Target market segment/efficiency - including eligible customers, properties, and measures/services - and eligibility requirements and processes | 1) Schedule (BJB)-2 | 1) $12,18,24,28,34,41,45,51,55,61-62$ |
| II.a.iii. | Existing incentives | 1) Schedule (BJB)-2 | 1) $91-103$ |
| II.a.iv. | Proposed incentives, including incentive payment processes and timeframes | 1) Schedule (BJB)-2 | 1) 91-103 |
| II.a.v. | Program delivery method | 1) Schedule (BJB)-2 | $\begin{aligned} & \text { 1) } 14-15,20,25-26,30-31,36-37,42-43 \text {, } \\ & 47-48,52-53,56-58,63-66 \end{aligned}$ |
| II.a.vi. | Customer financing options | 1) Schedule (BJB)-2 | 1) 126 |
| II.a.vii. | Customer access to current and historic energy usage data | 1) Schedule (BJB)-2 | 1) $16,21,26,31,38,43,49,53,59,66$ |
| II.a.viii. | Contractor requirements and role: The utility shall provide a description of the extent to which the utility intends to utilize employees, contractors, or both to deliver the program(s) and, to the extent applicable, a description of contractor requirements, training, and procurement, including for minority-, women-, and veteran-owned businesses. | 1) Schedule (BJB)-2 | $\begin{aligned} & \text { 1) 14-15, 20, 25-26, 30-31, 36-37, 42-43, } \\ & 47-48,52-53,56-58,63-66 \\ & \hline \end{aligned}$ |
| II.a.ix. | Estimated program participants, by year | 1) Schedule (BJB)-2 | 1) $16,21,26,31,38,43,49,53,59,67$ |
| II.a.x. | Projected energy savings and associated calculations for each program year <br> - Net annual energy savings <br> - Net annual peak demand savings <br> - Net lifetime energy savings <br> - Net lifetime demand savings <br> -Net lifetime energy savings derived from qualifying low-income customers <br> -Net lifetime energy savings derived from qualifying small commercial customers | 1) Schedule (BJB)-2 | 1) 16, 21-22, 26-27, 31-32, 38, 43-44, 49, 53, 59, 67 |
| II.a.xi. | Program budget, by year | 1) Schedule (BJB)-2 | $\begin{aligned} & 1) 17,22,27,32,39,44,50,54,59-60,67 \\ & 68 \end{aligned}$ |
| II.a.xii. | Projected program costs, by year, broken down into the following categories, as applicable: capital cost; utility administration; marketing; outside services; incentives (including rebates and low- or no-interest loans); inspections and quality control; and evaluation. To the extent that the Board directs New Jersey's Clean Energy Program ("NJCEP") to report additional categories, the utility shall provide additional categories, as applicable. | 1) Schedule (BJB)-2 | 1) $17,22,27,32,39,44,50,54,59-60,67$ 68 |
| II.a.xiii. | Implementation plan for all proposed programs | 1) Schedule (BJB)-2 | $\begin{aligned} & \text { 1) } 14-15,20,25-26,30-31,36-37,42-43 \text {, } \\ & 47-48,52-53,56-58,63-66,74-75 \end{aligned}$ |
| II.a.xiv. | Marketing plan: The utility shall provide a description of where and how the proposed program(s)/project(s) will be marketed or promoted throughout the demographic segments of the utility's customer base and how it will be done in coordination with statewide marketing. This shall include an explanation of how the specific service, along with prices, incentives, and energy bill savings for each proposed program/project, will be conveyed to customers, where available and applicable. The marketing plan shall also include a description of any known market barriers that may impact the program(s) and strategies to address known market barriers. | 1) Schedule (BJB)-2 | $\begin{aligned} & \text { 1) } 13-14,18-20,24-25,29-30,34-36,41- \\ & 42,45-47,51-52,62-63 \text {, } \end{aligned}$ |
| II.b. | The utility shall provide the following information about the proposed portfolio: |  |  |
| II.b.i. | Quality control standards and remediation policies: The utility shall provide a detailed description of the process(es) for ensuring the quality of the programs and resolving any customer complaints related to the program(s). | 1) Schedule (BJB)-2 | 1) 69-70 |
| II.b.ii. | Workforce development and job training partnerships and pipelines for energy efficiency iobs, including for local, underrepresented, and disadvantaged workers | 1) Schedule (BJB)-2 | 1) 71-73 |

MIMIMUM FILING REQUIREMENTS FOR PETITIONS UNDER N.J.S.A. 48:3-98.1
Location in Filing
Page Number or Specific Location

| II.b.iii. | Total budget summary, including an annual budget summary | 1) Schedule (BJB)-2 | 1) 113-125 |
| :---: | :---: | :---: | :---: |
| II.b.iv. | Benefit-cost analysis (as defined in Section V) | 1) Schedule (BJB)-2 <br> 2) Schedule (BJB)-3 | 1) 89 |
| II.b.v. | EM\&V strategies/plan (as defined in Section VI) | 1) Schedule (BJB)-2 | 1) 86-87 |
| II.b.vi. | Assessment of how the programs comprising the portfolio are designed to achieve the targets established pursuant to the utility's quantitative performance indicators (as defined in Section VII) | 1) Schedule (BJB)-2 | 1) 88 |
| II.b.vii. | Reporting plan (as defined in Section VIII) | 1) Schedule (BJB)-2 | 1) 76 |
| II.c. | In areas where gas and electric service territories overlap, the utility shall also provide a description of the program structure for coordinated, consistent delivery of programs among utilities and allocation of costs and energy savings among the utilities. | 1) Schedule (BJB)-2 | 1) $82-85$ |

III. Additional Filing Information


The utility shall provide a rate impact summary by year for the proposed program(s) and a cumulative rate impact summary by year for all approved and proposed programs showing the impact of individual programs, based upon a revenue requirement analysis that identifies all estimated program costs and revenues for each proposed program on an annual basis. Such rate impacts shall be calculated for each customer class. The utility shall also provide an annual bill impact summary by year for each program, and an annual cumulative bill impact summary by year for all approved and proposed programs showing bill impacts on a typical customer for each class.

1) Direct Testimony of Michael T. Normand 2) Direct Testimony of Marisa Slaten 2) Schedule (MTN)-2

The utility shall provide, with supporting documentation, a detailed breakdown of the total costs for the proposed program(s), identified by cost segment (capitalized costs, operating expenses, administrative expenses, etc.). This shall also include a detailed analysis and breakdown and separation of the embedded and incremental costs that will be incurred to provide the services under the proposed program(s), with all supporting documentation. Embedded costs are costs that are provided for in the utility's base rates or through another rate mechanism. Incremental costs are costs associated with or created by the proposed program that are not provided for in base rates or another rate IV.f. mechanism.

|  |  |  |
| :--- | :--- | :--- |
|  |  |  |
|  |  |  |
| 1) Direct Testimony of Michael T. Normand | 1) $3-5$ |  |
| 2) Schedule (MTN)-1 7 |  |  |

## V. Cost/Benefit Analysis

| V.a. | The utility shall conduct a benefit-cost analysis of the programs and portfolio using the New Jersey Cost Test, Participant Cost Test, Program Administrator Cost Test, Ratepayer Impact Measure Test, Total Resource Cost Test, and Societal Cost Test that assesses all program costs and benefits from a societal perspective i.e., that includes the combined financial costs and benefits realized by the utility and the customer. The utility may also provide any additional benefit-cost analysis that it believes appropriate with supporting rationales and documentation. | 1) Direct Testimony of Brendon J. Baatz <br> 2) Schedule (BJB)-2 <br> 3) Schedule (BJB)-3 | $\begin{aligned} & \text { 1) } 10-29 \\ & \text { 2) } 89 \end{aligned}$ |
| :---: | :---: | :---: | :---: |
| V.b. | The utility must demonstrate how the results of the tests in Section V(a) support Board approval of the proposed program(s), including how the programs are designed to achieve a benefit-to-cost ratio greater than or equal to 1.0 at the portfolio level when using the New Jersey Cost Test. | 1) Schedule (BJB)-4 <br> 2) Schedule (BJB)-5 (Confidential) <br> 3) Schedule (BJB)-3 |  |

Renewable energy programs shall not be subject to a benefit-cost test, but the utility
must quantify all direct and indirect benefits resulting from such a proposed program as
The level of energy and capacity savings utilized in these calculations shall be based upon the most recent Protocols to Measure Resource Savings approved by the Board to measure energy savings for NJCEP. To the extent that a protocol does not exist or an alternative protocol is proposed for a filed program, the utility must submit a
measurement methodology for the program or contemplated measure for approval by

For cost effectiveness calculations, the utility shall also estimate and reflect in the energy and capacity savings any free rider and spillover effects, i.e., savings associated with participating customers who would have implemented energy efficiency or renewable energy measures without N.J.S.A. 48:3-98.1 benefits or incentives.

Schedule (BJB)-3

## VI. Evaluation, Measurement and Verification



| VII. Quantitative Performance Indicators: Targets |  |  |  |
| :---: | :---: | :---: | :---: |
| VII.a. | The utility shall file quantitative performance indicator ("QPI") values based on the metrics applicable to each program year of the three-year program filing cycle. | 1) Schedule (BJB)-2 | $\begin{aligned} & 1) 16,21-22,26-27,31-32,38,43-44,49 \text {, } \\ & 53,59,67 \end{aligned}$ |
| VII.b. | The utility shall provide a description of how the proposed portfolio achieves the targets established for each utility pursuant to the following QPIs, as applicable for each program year: | 1) Schedule (BJB)-2 | 1) 88 |
| VII.b.i. | Net annual energy savings | 1) Schedule (BJB)-2 | $\begin{aligned} & \text { 1) } 16,21-22,26-27,32,38,43,49,53,60 \text {, } \\ & 68 \end{aligned}$ |
| VII.b.ii. | Net annual peak demand savings | 1) Schedule (BJB)-2 | $\begin{aligned} & \text { 1) } 16,21-22,26-27,32,38,43,49,53,60 \text {, } \\ & 68 \end{aligned}$ |
| VII.b.iii. | Net lifetime energy savings | 1) Schedule (BJB)-2 | $\begin{aligned} & \text { 1) } 16,21-22,26-27,32,38,43,49,53,60, \\ & 68 \end{aligned}$ |
| VII.b.iv. | Net lifetime demand savings | 1) Schedule (BJB)-2 | $\begin{aligned} & \text { 1) 16, 21-22, 26-27, 32, 38, 43, 49, 53, 60, } \\ & 68 \end{aligned}$ |
| VII.b.v. | Net present value of net benefits as determined by the Utility Cost Test | 1) Schedule (BJB)-2 | $\begin{aligned} & \text { 1) 16, 21-22, 26-27, 31-32, 38, 43-44, 49, } \\ & 53,59,67 \end{aligned}$ |
| VII.b.vi. | Net lifetime energy savings derived from qualifying low-income customers | 1) Schedule (BJB)-2 | $\begin{aligned} & \text { 1) 16, 21-22, 26-27, 31-32, 38, 43-44, 49, } \\ & 53,59,67 \end{aligned}$ |
| VII.b.vii. | Net lifetime energy savings derived from qualifying small commercial customers | 1) Schedule (BJB)-2 | 1) 88 |

Quarterly progress reports: No later than 60 days following the end of each quarter, the utility shall submit a user-friendly, public report, with accompanying spreadsheet(s), that includes an overview of program performance, a narrative about customer participation and incentives paid, and results on the following program-level parameters compared to program projections and goals:

| MIMIMUM FILING REQUIREMENTS FOR PETITIONS UNDER N.J.S.A. 48:3-98.1 |  | Location in Filing | Page Number or Specific Location |
| :---: | :---: | :---: | :---: |
| VIII.a.i. | Energy savings: gross and net savings | 1) Schedule (BJB)-2 | 1) 107-112 |
| VIII.a.ii. | Number of program participants: total, low-income, moderate-income, and small commercial | 1) Schedule (BJB)-2 | 1) $16,21,26,31,38,43,49,53,59,67$ |
| VIII.a.iii. | Program expenditures | 1) Schedule (BJB)-2 | 1) 113-125 |
| VIII.b. | Annual progress reports: No later than 75 days following the end of each program year, the utility shall submit a user-friendly, public report, with accompanying spreadsheet(s), that includes the same program-level data and accompanying progress/performance narratives as those that are included in the quarterly reports. The annual report will show overall progress and performance of programs that are seasonal or cyclical in nature. In addition, the annual report shall include the utility program administrator's initial and final benefit-cost test results for the programs and portfolio (as defined in Section V), assessment of the portfolio's compliance with the targets established pursuant to the QPIs (as defined in Section VII), and any proposed changes or additions for the next year or cycle. | 1) Schedule (BJB) -2 | 1) 76 |
| VIII.c. | Triennial Reports: | 1) Schedule (BJB)-2 | 1) 76 |
| VIII.c.i. | Progress reports: No later than 90 days following the end of the third program year, the utility shall submit a public report that takes the place of the annual report for that year. This report will be identical to the annual report but will also review the portfolio's data and assess the portfolio's success over the three-year program cycle. | 1) Schedule (BJB)-2 | 1) 76 |
| VIII.c.ii. | Evaluation studies: No later than 365 days following the end of the third program year, the utility shall submit the process and impact evaluations pursuant to requirements issued by the Board. | 1) Schedule (BJB)-2 | 1) 76 |

## Exhibit B-1

Three Year Comparative Balance Sheet


## -

COMPARATIVE BALANCE SHEET (ASSETS AND OTHER DEBITS)

Name of Respondent
Atlantic City Electric Company
This Report Is:
Date of Report
Year/Period of Report
Exhibit B-1 Page 1 of 12
Name of Respondent
(1) $\boxtimes$ An Original
(2) $\square$ A Resubmission
(Mo, Da, Yr)
End of $\quad \underline{\underline{2019 / Q 4}}$

Name of Respondent Atlantic City Electric Company

This Report Is:
(1) $\triangle$ An Original
(2)
) $\square$ A Resubmission
COMPARATIVE BALANCE SHEET (ASSETS AND OTHER DEBITSXContinued)

Exhibit B-1
Page 3 of 12

| Name of Respondent | This Report is: <br> $(1)$ X An Original <br> $(2)$ A Resubmission | Date of Report <br> (Mo, Da, Yr) <br> $03 / 27 / 2020$ | Year/Period of Report <br> Atlantic City Electric Company |  |  |  |  |
| :--- | :--- | :--- | :--- | :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |  |  |  | $2019 /$ Q4 |

## Schedule Page: 110 Line No.: 2 Column: c

Accounts 101.1, 111, 227 and 243 include $\$ 8,371,687, \$ 493,381, \$ 6,977,433$ and $\$ 900,874$, respectively, related to new vehicle and equipment leases in 2019 that qualify as capital leases under the new leasing standard implemented as of January 1, 2019.

## Schedule Page: 110 Line No.: 5 Column: c

Accounts 101.1, 111, 227 and 243 include $\$ 8,371,687, \$ 493,381, \$ 6,977,433$ and $\$ 900,874$, respectively, related to new vehicle and equipment leases in 2019 that qualify as capital leases under the new leasing standard implemented as of January 1, 2019

Name of Respondent
Atlantic City Electric Company

This Report is:
(1) $x$ An Original (2) $\square$ A Resubmission

Date of Report (mo, da, yr) 03/27/2020

Year/Period of Report
$\qquad$

Exhibit B-1 Page 4 of 12

## COMPARATIVE BALANCE SHEET (LIABILITIES AND OTHER CREDITS)

| Line No. | Title of Account <br> (a) | Ref. Page No. <br> (b) | Current Year <br> End of Quarter/Year Balance <br> (c) | Prior Year End Balance 12/31 <br> (d) |
| :---: | :---: | :---: | :---: | :---: |
| 1 | PROPRIETARY CAPITAL |  |  |  |
| 2 | Common Stock Issued (201) | 250-251 | 25,638,051 | 25,638,051 |
| 3 | Preferred Stock Issued (204) | 250-251 | 0 | 0 |
| 4 | Capital Stock Subscribed (202, 205) |  | 0 | 0 |
| 5 | Stock Liability for Conversion (203, 206) |  | 0 | 0 |
| 6 | Premium on Capital Stock (207) |  | 107,755,439 | 107,755,439 |
| 7 | Other Paid-In Capital (208-211) | 253 | 1,021,263,958 | 845,763,958 |
| 8 | Installments Received on Capital Stock (212) | 252 | 0 | 0 |
| 9 | (Less) Discount on Capital Stock (213) | 254 | 0 | 0 |
| 10 | (Less) Capital Stock Expense (214) | 254b | 532,682 | 532,682 |
| 11 | Retained Earnings (215, 215.1, 216) | 118-119 | 122,171,042 | 146,635,189 |
| 12 | Unappropriated Undistributed Subsidiary Earnings (216.1) | 118-119 | 0 | 0 |
| 13 | (Less) Reaquired Capital Stock (217) | 250-251 | 0 | 0 |
| 14 | Noncorporate Proprietorship (Non-major only) (218) |  | 0 | 0 |
| 15 | Accumulated Other Comprehensive Income (219) | 122(a)(b) | 0 | 0 |
| 16 | Total Proprietary Capital (lines 2 through 15) |  | 1,276,295,808 | 1,125,259,955 |
| 17 | LONG-TERM DEBT |  |  |  |
| 18 | Bonds (221) | 256-257 | 1,287,015,000 | 1,137,015,000 |
| 19 | (Less) Reaquired Bonds (222) | 256-257 | 0 | 0 |
| 20 | Advances from Associated Companies (223) | 256-257 | 26,383,829 | 39,382,643 |
| 21 | Other Long-Term Debt (224) | 256-257 | 0 | 0 |
| 22 | Unamortized Premium on Long-Term Debt (225) |  | 0 | 0 |
| 23 | (Less) Unamortized Discount on Long-Term Debt-Debit (226) |  | 562,786 | 644,716 |
| 24 | Total Long-Term Debt (lines 18 through 23) |  | 1,312,836,043 | 1,175,752,927 |
| 25 | OTHER NONCURRENT LIABILITIES |  |  |  |
| 26 | Obligations Under Capital Leases - Noncurrent (227) |  | 6,977,433 | 0 |
| 27 | Accumulated Provision for Property Insurance (228.1) |  | 0 | 0 |
| 28 | Accumulated Provision for Injuries and Damages (228.2) |  | 12,015,424 | 13,419,424 |
| 29 | Accumulated Provision for Pensions and Benefits (228.3) |  | 17,468,776 | 17,546,755 |
| 30 | Accumulated Miscellaneous Operating Provisions (228.4) |  | 339,020 | 433,000 |
| 31 | Accumulated Provision for Rate Refunds (229) |  | 0 | 0 |
| 32 | Long-Term Portion of Derivative Instrument Liabilities |  | 0 | 0 |
| 33 | Long-Term Portion of Derivative Instrument Liabilities - Hedges |  | 0 | 0 |
| 34 | Asset Retirement Obligations (230) |  | 4,103,099 | 4,143,723 |
| 35 | Total Other Noncurrent Liabilities (lines 26 through 34) |  | 40,903,752 | 35,542,902 |
| 36 | CURRENT AND ACCRUED LIABILITIES |  |  |  |
| 37 | Notes Payable (231) |  | 69,994,663 | 138,998,950 |
| 38 | Accounts Payable (232) |  | 117,035,133 | 140,076,302 |
| 39 | Notes Payable to Associated Companies (233) |  | 0 | 0 |
| 40 | Accounts Payable to Associated Companies (234) |  | 24,843,867 | 27,303,936 |
| 41 | Customer Deposits (235) |  | 25,129,483 | 26,111,333 |
| 42 | Taxes Accrued (236) | 262-263 | 8,060,491 | 5,062,353 |
| 43 | Interest Accrued (237) |  | 12,050,905 | 11,403,795 |
| 44 | Dividends Declared (238) |  | 0 | 0 |
| 45 | Matured Long-Term Debt (239) |  | 0 | 0 |

Name of Respondent Atlantic City Electric Company

This Report is:
(1) X An Original
(2) $\square$ A Resubmission

Date of Report
(mo, da, yr)
03/27/2020

Year/Period of Report

COMPARATIVE BA
Title of Account
(a)

| Line No. | Title of Account <br> (a) | Ref. Page No. <br> (b) | Current Year End of Quarter/Year Balance <br> (c) | Prior Year End Balance 12/31 <br> (d) |
| :---: | :---: | :---: | :---: | :---: |
| 46 | Matured Interest (240) |  | 0 | 0 |
| 47 | Tax Collections Payable (241) |  | 51 | 1,624 |
| 48 | Miscellaneous Current and Accrued Liabilities (242) |  | 50,540,005 | 33,055,050 |
| 49 | Obligations Under Capital Leases-Current (243) |  | 900,874 | 0 |
| 50 | Derivative Instrument Liabilities (244) |  | 0 | 0 |
| 51 | (Less) Long-Term Portion of Derivative Instrument Liabilities |  | 0 | 0 |
| 52 | Derivative Instrument Liabilities - Hedges (245) |  | 0 | 0 |
| 53 | (Less) Long-Term Portion of Derivative Instrument Liabilities-Hedges |  | 0 | 0 |
| 54 | Total Current and Accrued Liabilities (lines 37 through 53) |  | 308,555,472 | 382,013,343 |
| 55 | DEFERRED CREDITS |  |  |  |
| 56 | Customer Advances for Construction (252) |  | 1,192,755 | 2,072,535 |
| 57 | Accumulated Deferred Investment Tax Credits (255) | 266-267 | 3,033,967 | 3,359,797 |
| 58 | Deferred Gains from Disposition of Utility Plant (256) |  | 0 | 0 |
| 59 | Other Deferred Credits (253) | 269 | 8,645,241 | 8,904,873 |
| 60 | Other Regulatory Liabilities (254) | 278 | 399,471,288 | 436,515,932 |
| 61 | Unamortized Gain on Reaquired Debt (257) |  | 0 | 0 |
| 62 | Accum. Deferred Income Taxes-Accel. Amort.(281) | 272-277 | 0 | 0 |
| 63 | Accum. Deferred Income Taxes-Other Property (282) |  | 687,816,407 | 644,527,526 |
| 64 | Accum. Deferred Income Taxes-Other (283) |  | 41,607,190 | 51,814,792 |
| 65 | Total Deferred Credits (lines 56 through 64) |  | 1,141,766,848 | 1,147,195,455 |
| 66 | TOTAL LIABILITIES AND STOCKHOLDER EQUITY (lines 16, 24, 35, 54 and 65) |  | 4,080,357,923 | 3,865,764,582 |

Exhibit B-1
Page 6 of 12

| Name of Respondent | This Report is: <br> $(1)$ X An Original <br> $(2) ~ A ~ R e s u b m i s s i o n ~$ | Date of Report <br> $(\mathrm{Mo}, \mathrm{Da}, \mathrm{Yr})$ <br> $03 / 27 / 2020$ | Year/Period of Report <br> Atlantic City Electric Company |  |  |  |  |
| :--- | :--- | :---: | :---: | :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |  |  |  |  |

## Schedule Page: 112 Line No.: 20 Column: d

The balance includes $\$ 11,277,339$ which was previously reported in FERC Account 233
Schedule Page: 112 Line No.: 26 Column: c
Accounts 101.1, 111, 227 and 243 include $\$ 8,371,687, \$ 493,381, \$ 6,977,433$ and $\$ 900,874$, respectively, related to new vehicle and equipment leases in 2019 that qualify as capital leases under the new leasing standard implemented as of January 1, 2019.

## Schedule Page: 112 Line No.: 49 Column: c

Accounts 101.1, 111, 227 and 243 include $\$ 8,371,687, \$ 493,381, \$ 6,977,433$ and $\$ 900,874$, respectively, related to new vehicle and equipment leases in 2019 that qualify as capital leases under the new leasing standard implemented as of January 1, 2019.


## - <br> COMPARATIVE BALANCE SHEET (ASSETS AND OTHER DEBITS)

Name of Respondent
Atlantic City Electric Company
This Report Is:
Date of Report
Year/Period of Report
Exhibit B-1
(Mo, Da, Yr)
04/02/2019

Balance
$12 / 31$

3,620,182,834
3,758,323,762
$768,421,605$
$2,989,902,157$

13,984,529

2,960,001

Name of Respondent Atlantic City Electric Company

This Report Is:
(1) $\triangle$ An Original
(2) $\square$ A Resubmission

Date of Report (Mo, Da, Yr) 04/02/2019

Year/Period of Report
End of 2018/Q4

Exhibit B-1 Page 8 of 12

COMPARATIVE BALANCE SHEET (ASSETS AND OTHER DEBITS XContinued)

| Line <br> No. | Title of Account <br> (a) | Ref. Page No. <br> (b) | Current Year <br> End of Quarter/Year <br> Balance <br> (c) | Prior Year End Balance 12/31 <br> (d) |
| :---: | :---: | :---: | :---: | :---: |
| 53 | (Less) Noncurrent Portion of Allowances |  | 0 | 0 |
| 54 | Stores Expense Undistributed (163) | 227 | 0 | 0 |
| 55 | Gas Stored Underground - Current (164.1) |  | 0 | 0 |
| 56 | Liquefied Natural Gas Stored and Held for Processing (164.2-164.3) |  | 0 | 0 |
| 57 | Prepayments (165) |  | 902,968 | 371,936 |
| 58 | Advances for Gas (166-167) |  | 0 | 0 |
| 59 | Interest and Dividends Receivable (171) |  | 622 | 365 |
| 60 | Rents Receivable (172) |  | 1,282,201 | 3,282,709 |
| 61 | Accrued Utility Revenues (173) |  | 30,067,277 | 30,904,511 |
| 62 | Miscellaneous Current and Accrued Assets (174) |  | 4,364,478 | 500,001 |
| 63 | Derivative Instrument Assets (175) |  | 0 | 0 |
| 64 | (Less) Long-Term Portion of Derivative Instrument Assets (175) |  | 0 | 0 |
| 65 | Derivative Instrument Assets - Hedges (176) |  | 0 | 0 |
| 66 | (Less) Long-Term Portion of Derivative Instrument Assets - Hedges (176 |  | 0 | 0 |
| 67 | Total Current and Accrued Assets (Lines 34 through 66) |  | 195,727,149 | 181,752,061 |
| 68 | DEFERRED DEBITS |  |  |  |
| 69 | Unamortized Debt Expenses (181) |  | 7,462,310 | 5,593,748 |
| 70 | Extraordinary Property Losses (182.1) | 230a | 0 | 0 |
| 71 | Unrecovered Plant and Regulatory Study Costs (182.2) | 230b | 0 | 0 |
| 72 | Other Regulatory Assets (182.3) | 232 | 129,268,733 | 149,692,540 |
| 73 | Prelim. Survey and Investigation Charges (Electric) (183) |  | 0 | 0 |
| 74 | Preliminary Natural Gas Survey and Investigation Charges 183.1) |  | 0 | 0 |
| 75 | Other Preliminary Survey and Investigation Charges (183.2) |  | 0 | 0 |
| 76 | Clearing Accounts (184) |  | 0 | 0 |
| 77 | Temporary Facilities (185) |  | 0 | 0 |
| 78 | Miscellaneous Deferred Debits (186) | 233 | 86,416,978 | 96,946,357 |
| 79 | Def. Losses from Disposition of Utility Plt. (187) |  | 0 | 0 |
| 80 | Research, Devel. and Demonstration Expend. (188) | 352-353 | 0 | 0 |
| 81 | Unamortized Loss on Reaquired Debt (189) |  | 4,563,203 | 5,278,948 |
| 82 | Accumulated Deferred Income Taxes (190) | 234 | 163,863,996 | 175,160,945 |
| 83 | Unrecovered Purchased Gas Costs (191) |  | 0 | 0 |
| 84 | Total Deferred Debits (lines 69 through 83) |  | 391,575,220 | 432,672,538 |
| 85 | TOTAL ASSETS (lines 14-16, 32, 67, and 84) |  | 3,865,764,582 | 3,609,367,683 |


| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) X An Original <br> (2) _ A Resubmission | Date of Report (Mo, Da, Yr) 04/02/2019 | Year/Period of Report 2018/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |

## Schedule Page: 110 Line No.: 2 Column: d

Account was affected by policy alignment between Exelon Corporation and Atlantic City Electric Company. Line item previously netted Capital Leases of $\$ 108,223$ with its associated Accumulated Amortization of $\$ 108,223$. Capital Lease Accumulated Amortization is now reported in FERC Account 111.

## Schedule Page: 110 Line No.: 5 Column: d

Account was affected by policy alignment between Exelon Corporation and Atlantic City Electric Company. Line item includes $\$ 108,223$ of Capital Lease Accumulated Amortization previously reported in FERC Account 101.

## Schedule Page: 110 Line No.: 24 Column: d

Account was affected by policy alignment between Exelon Corporation and Atlantic City Electric Company. Line item includes $\$ 111,338$ representing the Cash Surrender Value of Officer Life Insurance policies previously reported in FERC Account 186.

## Schedule Page: 110 Line No.: 41 Column: d

Account was affected by policy alignment between Exelon Corporation and Atlantic City Electric Company. Line item includes $\$ 18,416,284$ related to Accounts Receivable balances associated with third party suppliers previously reported in FERC Account 142.

## Schedule Page: 110 Line No.: 78 Column: d

Account was affected by policy alignment between Exelon Corporation and Atlantic City Electric Company. Line item includes $\$ 3,562,143$ related to Long Term Notes Receivable balances previously reported in FERC account 128 and $\$ 830$ related to cash suspense account previously reported in FERC Account 242.

Name of Respondent
Atlantic City Electric Company

This Report is:
(1) $x$ An Original (2) $\square$ A Resubmission

Date of Report (mo, da, yr) 04/02/2019

Year/Period of Report
end of
2018/Q4

Exhibit B-1 age 10 of 12

## COMPARATIVE BALANCE SHEET (LIABILITIES AND OTHER CREDITS)

| Line <br> No. | Title of Account <br> (a) | Ref. Page No. <br> (b) | Current Year End of Quarter/Year Balance <br> (c) | Prior Year End Balance 12/31 <br> (d) |
| :---: | :---: | :---: | :---: | :---: |
| 1 | PROPRIETARY CAPITAL |  |  |  |
| 2 | Common Stock Issued (201) | 250-251 | 25,638,051 | 25,638,051 |
| 3 | Preferred Stock Issued (204) | 250-251 | 0 | 0 |
| 4 | Capital Stock Subscribed (202, 205) |  | 0 | 0 |
| 5 | Stock Liability for Conversion (203, 206) |  | 0 | 0 |
| 6 | Premium on Capital Stock (207) |  | 107,755,439 | 107,755,439 |
| 7 | Other Paid-In Capital (208-211) | 253 | 845,763,958 | 778,870,958 |
| 8 | Installments Received on Capital Stock (212) | 252 | 0 | 0 |
| 9 | (Less) Discount on Capital Stock (213) | 254 | 0 | 0 |
| 10 | (Less) Capital Stock Expense (214) | 254b | 532,682 | 532,682 |
| 11 | Retained Earnings (215, 215.1, 216) | 118-119 | 146,635,189 | 130,869,353 |
| 12 | Unappropriated Undistributed Subsidiary Earnings (216.1) | 118-119 | 0 | 0 |
| 13 | (Less) Reaquired Capital Stock (217) | 250-251 | 0 | 0 |
| 14 | Noncorporate Proprietorship (Non-major only) (218) |  | 0 | 0 |
| 15 | Accumulated Other Comprehensive Income (219) | 122(a)(b) | 0 | 0 |
| 16 | Total Proprietary Capital (lines 2 through 15) |  | 1,125,259,955 | 1,042,601,119 |
| 17 | LONG-TERM DEBT |  |  |  |
| 18 | Bonds (221) | 256-257 | 1,137,015,000 | 1,037,015,000 |
| 19 | (Less) Reaquired Bonds (222) | 256-257 | 0 | 0 |
| 20 | Advances from Associated Companies (223) | 256-257 | 28,105,304 | 40,506,230 |
| 21 | Other Long-Term Debt (224) | 256-257 | 0 | 0 |
| 22 | Unamortized Premium on Long-Term Debt (225) |  | 0 | 0 |
| 23 | (Less) Unamortized Discount on Long-Term Debt-Debit (226) |  | 644,716 | 495,778 |
| 24 | Total Long-Term Debt (lines 18 through 23) |  | 1,164,475,588 | 1,077,025,452 |
| 25 | OTHER NONCURRENT LIABILITIES |  |  |  |
| 26 | Obligations Under Capital Leases - Noncurrent (227) |  | 0 | 0 |
| 27 | Accumulated Provision for Property Insurance (228.1) |  | 0 | 0 |
| 28 | Accumulated Provision for Injuries and Damages (228.2) |  | 13,419,424 | 11,932,292 |
| 29 | Accumulated Provision for Pensions and Benefits (228.3) |  | 17,546,755 | 14,747,885 |
| 30 | Accumulated Miscellaneous Operating Provisions (228.4) |  | 433,000 | 343,942 |
| 31 | Accumulated Provision for Rate Refunds (229) |  | 0 | 0 |
| 32 | Long-Term Portion of Derivative Instrument Liabilities |  | 0 | 0 |
| 33 | Long-Term Portion of Derivative Instrument Liabilities - Hedges |  | 0 | 0 |
| 34 | Asset Retirement Obligations (230) |  | 4,143,723 | 3,660,586 |
| 35 | Total Other Noncurrent Liabilities (lines 26 through 34) |  | 35,542,902 | 30,684,705 |
| 36 | CURRENT AND ACCRUED LIABILITIES |  |  |  |
| 37 | Notes Payable (231) |  | 138,998,950 | 107,764,991 |
| 38 | Accounts Payable (232) |  | 140,076,302 | 107,022,492 |
| 39 | Notes Payable to Associated Companies (233) |  | 11,277,339 | 24,665,547 |
| 40 | Accounts Payable to Associated Companies (234) |  | 27,303,936 | 28,512,272 |
| 41 | Customer Deposits (235) |  | 26,111,333 | 30,568,034 |
| 42 | Taxes Accrued (236) | 262-263 | 5,062,353 | 4,812,882 |
| 43 | Interest Accrued (237) |  | 11,403,795 | 10,952,155 |
| 44 | Dividends Declared (238) |  | 0 | 0 |
| 45 | Matured Long-Term Debt (239) |  | 0 | 0 |

Name of Respondent Atlantic City Electric Company

This Report is:
(1) $x$ An Original (2) $\square$ A Resubmission

Date of Report
(mo, da, yr) 04/02/2019

Year/Period of Report
$-$

| Line |  |
| :--- | :---: |
| No. | Title of Account <br> (a) |


| 46 | Matured Interest (240) |  | 0 | 0 |
| :---: | :---: | :---: | :---: | :---: |
| 47 | Tax Collections Payable (241) |  | 1,624 | 0 |
| 48 | Miscellaneous Current and Accrued Liabilities (242) |  | 33,055,050 | 32,986,468 |
| 49 | Obligations Under Capital Leases-Current (243) |  | 0 | 0 |
| 50 | Derivative Instrument Liabilities (244) |  | 0 | 0 |
| 51 | (Less) Long-Term Portion of Derivative Instrument Liabilities |  | 0 | 0 |
| 52 | Derivative Instrument Liabilities - Hedges (245) |  | 0 | 0 |
| 53 | (Less) Long-Term Portion of Derivative Instrument Liabilities-Hedges |  | 0 | 0 |
| 54 | Total Current and Accrued Liabilities (lines 37 through 53) |  | 393,290,682 | 347,284,841 |
| 55 | DEFERRED CREDITS |  |  |  |
| 56 | Customer Advances for Construction (252) |  | 2,072,535 | 1,487,630 |
| 57 | Accumulated Deferred Investment Tax Credits (255) | 266-267 | 3,359,797 | 3,697,280 |
| 58 | Deferred Gains from Disposition of Utility Plant (256) |  | 0 | 0 |
| 59 | Other Deferred Credits (253) | 269 | 8,904,873 | 9,108,691 |
| 60 | Other Regulatory Liabilities (254) | 278 | 436,515,932 | 432,982,411 |
| 61 | Unamortized Gain on Reaquired Debt (257) |  | 0 | 0 |
| 62 | Accum. Deferred Income Taxes-Accel. Amort.(281) | 272-277 | 0 | 0 |
| 63 | Accum. Deferred Income Taxes-Other Property (282) |  | 644,527,526 | 601,012,772 |
| 64 | Accum. Deferred Income Taxes-Other (283) |  | 51,814,792 | 63,482,782 |
| 65 | Total Deferred Credits (lines 56 through 64) |  | 1,147,195,455 | 1,111,771,566 |
| 66 | TOTAL LIABILITIES AND STOCKHOLDER EQUITY (lines 16, 24, 35, 54 and 65) |  | 3,865,764,582 | 3,609,367,683 |

Exhibit B-1
Page 12 of 12

| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) $X$ An Original <br> (2) A Resubmission | Date of Report (Mo, Da, Yr) 04/02/2019 | Year/Period of Report 2018/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |

## Schedule Page: 112 Line No.: 28 Column: d

Account was affected by policy alignment between Exelon Corporation and Atlantic City Electric Company. Line item includes $\$ 11,932,292$ related to workers compensation and bodily injury accruals previously reported in FERC Account 242.

## Schedule Page: 112 Line No.: 29 Column: d

Account was affected by policy alignment between Exelon Corporation and Atlantic City Electric Company. Line item includes $\$ 14,747,885$ related to Supplemental Executive Retirement Plans, Long-term Incentive Plans, Other Postemployment Benefits and deferred compensation plans of which $\$ 14,742,649$ was previously reported in FERC Account 242 and $\$$ 5,236 was previously reported in FERC Account 253.

Schedule Page: 112 Line No.: 30 Column: d
Account was affected by policy alignment between Exelon Corporation and Atlantic City Electric Company. Line item includes $\$ 343,942$ related to accrued environmental long-term liabilities previously reported in FERC Account 253.

## Schedule Page: 112 Line No.: 48 Column: d

Account was affected by policy alignment between Exelon Corporation and Atlantic City Electric Company. Line item includes $\$ 881,501$ related to Supplemental Executive Retirement Plan previously reported in FERC Account 186. Line item includes $\$ 135,000$ related to short term Deferred Compensation previously reported in FERC Account 253.

Schedule Page: 112 Line No.: 59 Column: d
Account was affected by policy alignment between Exelon Corporation and Atlantic City Electric Company. Line item includes $\$ 1,779,391$ related to Third Party Supplier Deposits previously reported in FERC account 242.

## Exhibit B-2

## Three Year Comparative Income Statement

## Quarterly

1. Report in column (c) the current year to date balance. Column (c) equals the total of adding the data in column (g) plus the data in column (i) plus the data in column (k). Report in column (d) similar data for the previous year. This information is reported in the annual filing only.
2. Enter in column (e) the balance for the reporting quarter and in column (f) the balance for the same three month period for the prior year.
3. Report in column (g) the quarter to date amounts for electric utility function; in column (i) the quarter to date amounts for gas utility, and in column (k) the quarter to date amounts for other utility function for the current year quarter.
4. Report in column (h) the quarter to date amounts for electric utility function; in column (j) the quarter to date amounts for gas utility, and in column (I) the quarter to date amounts for other utility function for the prior year quarter.
5. If additional columns are needed, place them in a footnote.

Annual or Quarterly if applicable
5. Do not report fourth quarter data in columns (e) and (f)
6. Report amounts for accounts 412 and 413, Revenues and Expenses from Utility Plant Leased to Others, in another utility columnin a similar manner to a utility department. Spread the amount(s) over lines 2 thru 26 as appropriate. Include these amounts in columns (c) and (d) totals.
7. Report amounts in account 414, Other Utility Operating Income, in the same manner as accounts 412 and 413 above.

| Line No. | Title of Account <br> (a) | (Ref.) <br> Page No. <br> (b) | Total Current Year to Date Balance for Quarter/Year (c) | Total <br> Prior Year to Date Balance for Quarter/Year (d) | Current 3 Months Ended Quarterly Only No 4th Quarter (e) | Prior 3 Months Ended Quarterly Only No 4th Quarter (f) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | UTILITY OPERATING INCOME |  |  |  |  |  |
| 2 | Operating Revenues (400) | 300-301 | 1,250,070,328 | 1,257,191,663 |  |  |
| 3 | Operating Expenses |  |  |  |  |  |
| 4 | Operation Expenses (401) | 320-323 | 857,316,327 | 900,960,965 |  |  |
| 5 | Maintenance Expenses (402) | 320-323 | 85,867,099 | 73,017,689 |  |  |
| 6 | Depreciation Expense (403) | 336-337 | 117,199,099 | 92,962,303 |  |  |
| 7 | Depreciation Expense for Asset Retirement Costs (403.1) | 336-337 |  |  |  |  |
| 8 | Amort. \& Depl. of Utility Plant (404-405) | 336-337 | 5,813,108 | 1,208,288 |  |  |
| 9 | Amort. of Utility Plant Acq. Adj. (406) | 336-337 |  |  |  |  |
| 10 | Amort. Property Losses, Unrecov Plant and Regulatory Study Costs (407) |  |  |  |  |  |
| 11 | Amort. of Conversion Expenses (407) |  |  |  |  |  |
| 12 | Regulatory Debits (407.3) |  | 24,878,573 | 34,275,559 |  |  |
| 13 | (Less) Regulatory Credits (407.4) |  |  |  |  |  |
| 14 | Taxes Other Than Income Taxes (408.1) | 262-263 | 4,382,616 | 5,037,910 |  |  |
| 15 | Income Taxes - Federal (409.1) | 262-263 | -2,647,616 | -14,165,955 |  |  |
| 16 | - Other (409.1) | 262-263 | -4,642 | 4,000 |  |  |
| 17 | Provision for Deferred Income Taxes (410.1) | 234, 272-277 | 59,927,992 | 80,579,927 |  |  |
| 18 | (Less) Provision for Deferred Income Taxes-Cr. (411.1) | 234, 272-277 | 56,439,516 | 54,758,183 |  |  |
| 19 | Investment Tax Credit Adj. - Net (411.4) | 266 | -325,830 | -337,483 |  |  |
| 20 | (Less) Gains from Disp. of Utility Plant (411.6) |  |  |  |  |  |
| 21 | Losses from Disp. of Utility Plant (411.7) |  |  |  |  |  |
| 22 | (Less) Gains from Disposition of Allowances (411.8) |  |  |  |  |  |
| 23 | Losses from Disposition of Allowances (411.9) |  |  |  |  |  |
| 24 | Accretion Expense (411.10) |  | 81,446 | 98,933 |  |  |
| 25 | TOTAL Utility Operating Expenses (Enter Total of lines 4 thru 24) |  | 1,096,048,656 | 1,118,883,953 |  |  |
| 26 | Net Util Oper Inc (Enter Tot line 2 less 25) Carry to Pg117,line 27 |  | 154,021,672 | 138,307,710 |  |  |
|  |  |  |  |  |  |  |

9. Use page 122 for important notes regarding the statement of income for any account thereof.
10. Give concise explanations concerning unsettled rate proceedings where a contingency exists such that refunds of a material amount may need to be made to the utility's customers or which may result in material refund to the utility with respect to power or gas purchases. State for each year effected the gross revenues or costs to which the contingency relates and the tax effects together with an explanation of the major factors which affect the rights of the utility to retain such revenues or recover amounts paid with respect to power or gas purchases.
11 Give concise explanations concerning significant amounts of any refunds made or received during the year resulting from settlement of any rate proceeding affecting revenues received or costs incurred for power or gas purches, and a summary of the adjustments made to balance sheet, income, and expense accounts.
11. If any notes appearing in the report to stokholders are applicable to the Statement of Income, such notes may be included at page 122.
12. Enter on page 122 a concise explanation of only those changes in accounting methods made during the year which had an effect on net income, including the basis of allocations and apportionments from those used in the preceding year. Also, give the appropriate dollar effect of such changes.
13. Explain in a footnote if the previous year's/quarter's figures are different from that reported in prior reports.
14. If the columns are insufficient for reporting additional utility departments, supply the appropriate account titles report the information in a footnote to this schedule.


| Name | of Respondent tic City Electric Company | This Rep <br> (1) <br> (2) | inal <br> bmission |  | of Report <br> Da, Yr) <br> 7/2020 | Year/Perio <br> End of | $\begin{aligned} & \text { f Report } \\ & \text { 2019/Q4 } \end{aligned}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | EMENT OF | COME FOR | YEAR (conti |  |  |  |
| Line |  |  |  | TO |  |  | Prior 3 Months <br> Ended |
|  | Title of Account <br> (a) |  | (Ref.) Page No. <br> (b) | Current Year (c) | Previous Year <br> (d) | Quarterly Only No 4th Quarter (e) | Quarterly Only No 4th Quarter (f) |
| 27 | Net Utility Operating Income (Carried forward from page 114) |  |  | 154,021,672 | 138,307,710 |  |  |
| 28 | Other Income and Deductions |  |  |  |  |  |  |
| 29 | Other Income |  |  |  |  |  |  |
| 30 | Nonutilty Operating Income |  |  |  |  |  |  |
| 31 | Revenues From Merchandising, Jobbing and Contract Work | (415) |  | 1,255,348 | 2,338,192 |  |  |
| 32 | (Less) Costs and Exp. of Merchandising, Job. \& Contract Wo | rk (416) |  | 2,577,406 | 1,751,625 |  |  |
| 33 | Revenues From Nonutility Operations (417) |  |  | 6,627 | 9,335 |  |  |
| 34 | (Less) Expenses of Nonutility Operations (417.1) |  |  | 98,329 | 79,088 |  |  |
| 35 | Nonoperating Rental Income (418) |  |  |  |  |  |  |
| 36 | Equity in Earnings of Subsidiary Companies (418.1) |  | 119 |  |  |  |  |
| 37 | Interest and Dividend Income (419) |  |  | 253,242 | 133,947 |  |  |
| 38 | Allowance for Other Funds Used During Construction (419.1) |  |  | 5,058,773 | 762,733 |  |  |
| 39 | Miscellaneous Nonoperating Income (421) |  |  | 1,344,709 | 1,242,844 |  |  |
| 40 | Gain on Disposition of Property (421.1) |  |  |  |  |  |  |
| 41 | TOTAL Other Income (Enter Total of lines 31 thru 40) |  |  | 5,242,964 | 2,656,338 |  |  |
| 42 | Other Income Deductions |  |  |  |  |  |  |
| 43 | Loss on Disposition of Property (421.2) |  |  | 362 |  |  |  |
| 44 | Miscellaneous Amortization (425) |  |  |  |  |  |  |
| 45 | Donations (426.1) |  |  | 439,154 | 471,094 |  |  |
| 46 | Life Insurance (426.2) |  |  | 85,993 | 27,657 |  |  |
| 47 | Penalties (426.3) |  |  | 276,248 | 137,238 |  |  |
| 48 | Exp. for Certain Civic, Political \& Related Activities (426.4) |  |  | 919,460 | 712,383 |  |  |
| 49 | Other Deductions (426.5) |  |  | 689,378 | 45,733 |  |  |
| 50 | TOTAL Other Income Deductions (Total of lines 43 thru 49) |  |  | 2,410,595 | 1,394,105 |  |  |
| 51 | Taxes Applic. to Other Income and Deductions |  |  |  |  |  |  |
| 52 | Taxes Other Than Income Taxes (408.2) |  | 262-263 | 257,713 | 275,558 |  |  |
| 53 | Income Taxes-Federal (409.2) |  | 262-263 | -17,494 | -356,185 |  |  |
| 54 | Income Taxes-Other (409.2) |  | 262-263 |  |  |  |  |
| 55 | Provision for Deferred Inc. Taxes (410.2) |  | 234, 272-277 | 468,989 | 650,176 |  |  |
| 56 | (Less) Provision for Deferred Income Taxes-Cr. (411.2) |  | 234, 272-277 | 747,956 | 218,397 |  |  |
| 57 | Investment Tax Credit Adj.-Net (411.5) |  |  |  |  |  |  |
| 58 | (Less) Investment Tax Credits (420) |  |  |  |  |  |  |
| 59 | TOTAL Taxes on Other Income and Deductions (Total of lines | 52-58) |  | -38,748 | 351,152 |  |  |
| 60 | Net Other Income and Deductions (Total of lines 41, 50, 59) |  |  | 2,871,117 | 911,081 |  |  |
| 61 | Interest Charges |  |  |  |  |  |  |
| 62 | Interest on Long-Term Debt (427) |  |  | 53,237,771 | 55,649,855 |  |  |
| 63 | Amort. of Debt Disc. and Expense (428) |  |  | 1,184,503 | 1,261,501 |  |  |
| 64 | Amortization of Loss on Reaquired Debt (428.1) |  |  | 707,855 | 715,745 |  |  |
| 65 | (Less) Amort. of Premium on Debt-Credit (429) |  |  |  |  |  |  |
| 66 | (Less) Amortization of Gain on Reaquired Debt-Credit (429.1) |  |  |  |  |  |  |
| 67 | Interest on Debt to Assoc. Companies (430) |  |  | 2,610,684 | 4,165,880 |  |  |
| 68 | Other Interest Expense (431) |  |  | 3,857,387 | 5,468,272 |  |  |
| 69 | (Less) Allowance for Borrowed Funds Used During Construc | ction-Cr. (432) |  | 3,841,264 | 3,008,298 |  |  |
| 70 | Net Interest Charges (Total of lines 62 thru 69) |  |  | 57,756,936 | 64,252,955 |  |  |
| 71 | Income Before Extraordinary Items (Total of lines 27, 60 and |  |  | 99,135,853 | 74,965,836 |  |  |
| 72 | Extraordinary Items |  |  |  |  |  |  |
| 73 | Extraordinary Income (434) |  |  |  |  |  |  |
| 74 | (Less) Extraordinary Deductions (435) |  |  |  |  |  |  |
| 75 | Net Extraordinary Items (Total of line 73 less line 74) |  |  |  |  |  |  |
| 76 | Income Taxes-Federal and Other (409.3) |  | 262-263 |  |  |  |  |
| 77 | Extraordinary Items After Taxes (line 75 less line 76) |  |  |  |  |  |  |
| 78 | Net Income (Total of line 71 and 77) |  |  | 99,135,853 | 74,965,836 |  |  |
|  |  |  |  |  |  |  |  |

Exhibit B-2 Page 3 of 7
or 3 Months Quarterly Only No 4th Quarter (f)

1. Report in column (c) the current year to date balance. Column (c) equals the total of adding the data in column (g) plus the data in column (i) plus the data in column (k). Report in column (d) similar data for the previous year. This information is reported in the annual filing only.
2. Enter in column (e) the balance for the reporting quarter and in column (f) the balance for the same three month period for the prior year.
3. Report in column (g) the quarter to date amounts for electric utility function; in column (i) the quarter to date amounts for gas utility, and in column (k) the quarter to date amounts for other utility function for the current year quarter.
4. Report in column (h) the quarter to date amounts for electric utility function; in column (j) the quarter to date amounts for gas utility, and in column (I) the quarter to date amounts for other utility function for the prior year quarter.
5. If additional columns are needed, place them in a footnote.

Annual or Quarterly if applicable
5. Do not report fourth quarter data in columns (e) and (f)
6. Report amounts for accounts 412 and 413, Revenues and Expenses from Utility Plant Leased to Others, in another utility columnin a similar manner to a utility department. Spread the amount(s) over lines 2 thru 26 as appropriate. Include these amounts in columns (c) and (d) totals.
7. Report amounts in account 414, Other Utility Operating Income, in the same manner as accounts 412 and 413 above.

| Line No. | Title of Account <br> (a) | (Ref.) <br> Page No. <br> (b) | Total Current Year to Date Balance for Quarter/Year (c) | Total <br> Prior Year to Date Balance for Quarter/Year (d) | Current 3 Months Ended Quarterly Only No 4th Quarter (e) | Prior 3 Months Ended Quarterly Only No 4th Quarter (f) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | UTILITY OPERATING INCOME |  |  |  |  |  |
| 2 | Operating Revenues (400) | 300-301 | 1,257,191,663 | 1,199,607,487 |  |  |
| 3 | Operating Expenses |  |  |  |  |  |
| 4 | Operation Expenses (401) | 320-323 | 900,960,965 | 821,508,450 |  |  |
| 5 | Maintenance Expenses (402) | 320-323 | 73,017,689 | 71,243,766 |  |  |
| 6 | Depreciation Expense (403) | 336-337 | 92,962,303 | 88,284,585 |  |  |
| 7 | Depreciation Expense for Asset Retirement Costs (403.1) | 336-337 |  |  |  |  |
| 8 | Amort. \& Depl. of Utility Plant (404-405) | 336-337 | 1,208,288 | 173,651 |  |  |
| 9 | Amort. of Utility Plant Acq. Adj. (406) | 336-337 |  |  |  |  |
| 10 | Amort. Property Losses, Unrecov Plant and Regulatory Study Costs (407) |  |  |  |  |  |
| 11 | Amort. of Conversion Expenses (407) |  |  |  |  |  |
| 12 | Regulatory Debits (407.3) |  | 34,275,559 | 50,648,540 |  |  |
| 13 | (Less) Regulatory Credits (407.4) |  |  |  |  |  |
| 14 | Taxes Other Than Income Taxes (408.1) | 262-263 | 5,037,910 | 6,303,933 |  |  |
| 15 | Income Taxes - Federal (409.1) | 262-263 | -14,165,955 | -4,186,350 |  |  |
| 16 | - Other (409.1) | 262-263 | 4,000 | 3,474 |  |  |
| 17 | Provision for Deferred Income Taxes (410.1) | 234, 272-277 | 80,579,927 | 202,016,301 |  |  |
| 18 | (Less) Provision for Deferred Income Taxes-Cr. (411.1) | 234, 272-277 | 54,758,183 | 150,944,122 |  |  |
| 19 | Investment Tax Credit Adj. - Net (411.4) | 266 | -337,483 | -363,377 |  |  |
| 20 | (Less) Gains from Disp. of Utility Plant (411.6) |  |  |  |  |  |
| 21 | Losses from Disp. of Utility Plant (411.7) |  |  |  |  |  |
| 22 | (Less) Gains from Disposition of Allowances (411.8) |  |  |  |  |  |
| 23 | Losses from Disposition of Allowances (411.9) |  |  |  |  |  |
| 24 | Accretion Expense (411.10) |  | 98,933 | 101,283 |  |  |
| 25 | TOTAL Utility Operating Expenses (Enter Total of lines 4 thru 24) |  | 1,118,883,953 | 1,084,790,134 |  |  |
| 26 | Net Util Oper Inc (Enter Tot line 2 less 25) Carry to Pg117,line 27 |  | 138,307,710 | 114,817,353 |  |  |
|  |  |  |  |  |  |  |

Name of Respondent
Atlantic City Electric Company

Year/Period of Report
9. Use page 122 for important notes regarding the statement of income for any account thereof.
10. Give concise explanations concerning unsettled rate proceedings where a contingency exists such that refunds of a material amount may need to be made to the utility's customers or which may result in material refund to the utility with respect to power or gas purchases. State for each year effected the gross revenues or costs to which the contingency relates and the tax effects together with an explanation of the major factors which affect the rights of the utility to retain such revenues or recover amounts paid with respect to power or gas purchases.
11 Give concise explanations concerning significant amounts of any refunds made or received during the year resulting from settlement of any rate proceeding affecting revenues received or costs incurred for power or gas purches, and a summary of the adjustments made to balance sheet, income, and expense accounts.
12. If any notes appearing in the report to stokholders are applicable to the Statement of Income, such notes may be included at page 122.
13. Enter on page 122 a concise explanation of only those changes in accounting methods made during the year which had an effect on net income, including the basis of allocations and apportionments from those used in the preceding year. Also, give the appropriate dollar effect of such changes.
14. Explain in a footnote if the previous year's/quarter's figures are different from that reported in prior reports.
15. If the columns are insufficient for reporting additional utility departments, supply the appropriate account titles report the information in a footnote to this schedule.

| ELECTRIC UTILITY |  | GAS UTILITY |  | OTHER UTILITY |  | Line No. |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Current Year to Date (in dollars) <br> (g) | Previous Year to Date (in dollars) <br> (h) | Current Year to Date (in dollars) <br> (i) | Previous Year to Date (in dollars) <br> (j) | Current Year to Date (in dollars) <br> (k) | Previous Year to Date (in dollars) <br> (I) |  |
|  |  |  |  |  |  | 1 |
| 1,257,191,663 | 1,199,607,487 |  |  |  |  | 2 |
|  |  |  |  |  |  | 3 |
| 900,960,965 | 821,508,450 |  |  |  |  | 4 |
| 73,017,689 | 71,243,766 |  |  |  |  | 5 |
| 92,962,303 | 88,284,585 |  |  |  |  | 6 |
|  |  |  |  |  |  | 7 |
| 1,208,288 | 173,651 |  |  |  |  | 8 |
|  |  |  |  |  |  | 9 |
|  |  |  |  |  |  | 10 |
|  |  |  |  |  |  | 11 |
| 34,275,559 | 50,648,540 |  |  |  |  | 12 |
|  |  |  |  |  |  | 13 |
| 5,037,910 | 6,303,933 |  |  |  |  | 14 |
| -14,165,955 | -4,186,350 |  |  |  |  | 15 |
| 4,000 | 3,474 |  |  |  |  | 16 |
| 80,579,927 | 202,016,301 |  |  |  |  | 17 |
| 54,758,183 | 150,944,122 |  |  |  |  | 18 |
| -337,483 | -363,377 |  |  |  |  | 19 |
|  |  |  |  |  |  | 20 |
|  |  |  |  |  |  | 21 |
|  |  |  |  |  |  | 22 |
|  |  |  |  |  |  | 23 |
| 98,933 | 101,283 |  |  |  |  | 24 |
| 1,118,883,953 | 1,084,790,134 |  |  |  |  | 25 |
| 138,307,710 | 114,817,353 |  |  |  |  | 26 |
|  |  |  |  |  |  |  |


| Name | of Respondent tic City Electric Company | This Rep <br> (1) <br> (2) | inal <br> bmission |  | of Report Da, Yr) $2019$ | Year/Perio <br> End of | $\begin{aligned} & \text { f Report } \\ & \text { 2018/Q4 } \end{aligned}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | EMENT OF | COME FOR | YEAR (cont |  |  |  |
| Line |  |  |  | TO |  |  | Prior 3 Months <br> Ended |
|  | Title of Account <br> (a) |  | (Ref.) Page No. <br> (b) | Current Year (c) | Previous Year <br> (d) | Quarterly Only No 4th Quarter (e) | Quarterly Only No 4th Quarter (f) |
| 27 | Net Utility Operating Income (Carried forward from page 114) |  |  | 138,307,710 | 114,817,353 |  |  |
| 28 | Other Income and Deductions |  |  |  |  |  |  |
| 29 | Other Income |  |  |  |  |  |  |
| 30 | Nonutilty Operating Income |  |  |  |  |  |  |
| 31 | Revenues From Merchandising, Jobbing and Contract Work | (415) |  | 2,338,192 | 998,760 |  |  |
| 32 | (Less) Costs and Exp. of Merchandising, Job. \& Contract Wo | rk (416) |  | 1,751,625 | 2,234,290 |  |  |
| 33 | Revenues From Nonutility Operations (417) |  |  | 9,335 | 26,532 |  |  |
| 34 | (Less) Expenses of Nonutility Operations (417.1) |  |  | 79,088 | 190,459 |  |  |
| 35 | Nonoperating Rental Income (418) |  |  |  |  |  |  |
| 36 | Equity in Earnings of Subsidiary Companies (418.1) |  | 119 |  |  |  |  |
| 37 | Interest and Dividend Income (419) |  |  | 133,947 | 208,411 |  |  |
| 38 | Allowance for Other Funds Used During Construction (419.1) |  |  | 762,733 | 6,178,988 |  |  |
| 39 | Miscellaneous Nonoperating Income (421) |  |  | 1,242,844 | 1,205,218 |  |  |
| 40 | Gain on Disposition of Property (421.1) |  |  |  | 55,165 |  |  |
| 41 | TOTAL Other Income (Enter Total of lines 31 thru 40) |  |  | 2,656,338 | 6,248,325 |  |  |
| 42 | Other Income Deductions |  |  |  |  |  |  |
| 43 | Loss on Disposition of Property (421.2) |  |  |  | 2,083 |  |  |
| 44 | Miscellaneous Amortization (425) |  |  |  |  |  |  |
| 45 | Donations (426.1) |  |  | 471,094 | 1,085,603 |  |  |
| 46 | Life Insurance (426.2) |  |  | 27,657 | -336,119 |  |  |
| 47 | Penalties (426.3) |  |  | 137,238 | 53,595 |  |  |
| 48 | Exp. for Certain Civic, Political \& Related Activities (426.4) |  |  | 712,383 | 574,936 |  |  |
| 49 | Other Deductions (426.5) |  |  | 45,733 | 1,337,309 |  |  |
| 50 | TOTAL Other Income Deductions (Total of lines 43 thru 49) |  |  | 1,394,105 | 2,717,407 |  |  |
| 51 | Taxes Applic. to Other Income and Deductions |  |  |  |  |  |  |
| 52 | Taxes Other Than Income Taxes (408.2) |  | 262-263 | 275,558 | 377,509 |  |  |
| 53 | Income Taxes-Federal (409.2) |  | 262-263 | -356,185 | -16,042,684 |  |  |
| 54 | Income Taxes-Other (409.2) |  | 262-263 |  | -4,533,254 |  |  |
| 55 | Provision for Deferred Inc. Taxes (410.2) |  | 234, 272-277 | 650,176 | 11,735,034 |  |  |
| 56 | (Less) Provision for Deferred Income Taxes-Cr. (411.2) |  | 234, 272-277 | 218,397 | 11,335,612 |  |  |
| 57 | Investment Tax Credit Adj.-Net (411.5) |  |  |  |  |  |  |
| 58 | (Less) Investment Tax Credits (420) |  |  |  |  |  |  |
| 59 | TOTAL Taxes on Other Income and Deductions (Total of lines | 52-58) |  | 351,152 | -19,799,007 |  |  |
| 60 | Net Other Income and Deductions (Total of lines 41, 50, 59) |  |  | 911,081 | 23,329,925 |  |  |
| 61 | Interest Charges |  |  |  |  |  |  |
| 62 | Interest on Long-Term Debt (427) |  |  | 55,649,855 | 55,362,241 |  |  |
| 63 | Amort. of Debt Disc. and Expense (428) |  |  | 1,261,501 | 1,190,404 |  |  |
| 64 | Amortization of Loss on Reaquired Debt (428.1) |  |  | 715,745 | 741,882 |  |  |
| 65 | (Less) Amort. of Premium on Debt-Credit (429) |  |  |  |  |  |  |
| 66 | (Less) Amortization of Gain on Reaquired Debt-Credit (429.1) |  |  |  |  |  |  |
| 67 | Interest on Debt to Assoc. Companies (430) |  |  | 4,165,880 | 5,697,942 |  |  |
| 68 | Other Interest Expense (431) |  |  | 5,468,272 | 1,159,183 |  |  |
| 69 | (Less) Allowance for Borrowed Funds Used During Construc | ction-Cr. (432) |  | 3,008,298 | 3,344,417 |  |  |
| 70 | Net Interest Charges (Total of lines 62 thru 69) |  |  | 64,252,955 | 60,807,235 |  |  |
| 71 | Income Before Extraordinary Items (Total of lines 27, 60 and |  |  | 74,965,836 | 77,340,043 |  |  |
| 72 | Extraordinary Items |  |  |  |  |  |  |
| 73 | Extraordinary Income (434) |  |  |  |  |  |  |
| 74 | (Less) Extraordinary Deductions (435) |  |  |  |  |  |  |
| 75 | Net Extraordinary Items (Total of line 73 less line 74) |  |  |  |  |  |  |
| 76 | Income Taxes-Federal and Other (409.3) |  | 262-263 |  |  |  |  |
| 77 | Extraordinary Items After Taxes (line 75 less line 76) |  |  |  |  |  |  |
| 78 | Net Income (Total of line 71 and 77) |  |  | 74,965,836 | 77,340,043 |  |  |
|  |  |  |  |  |  |  |  |

Exhibit B-2 Page 6 of 7
or 3 Months Quarterly Only No 4th Quarter (f)

| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) $\underline{X}$ An Original <br> (2) _ A Resubmission | Date of Report (Mo, Da, Yr) 04/02/2019 | Year/Period of Report 2018/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |

## Schedule Page: 114 Line No.: 2 Column: c

Line item includes $\$ 1,693,410$ related to service provided to affiliates as intercompany revenue previously reported in FERC account 401 . This was a presentation change due to alignment of revenues with other Exelon companies.

## Exhibit B-3

## June 30, 2020 Balance Sheet



## Name of Respondent

 Atlantic City Electric Company-amparative balance seret (Asse
COMPARATIVE BALANCE SHEET (ASSETS AND OTHER DEBITS)

Exhibit B-3 Page 1 of 5

Name of Respondent Atlantic City Electric Company

This Report Is:
(1) $\triangle$ An Original
(2) $\square$ A Resubmission

Date of Report (Mo, Da, Yr)
$1 /$

Year/Period of Report
YearPeriod of Report
End of 2020/Q2

Exhibit B-3
Page 2 of 5

COMPARATIVE BALANCE SHEET (ASSETS AND OTHER DEBITSXContinued)

| Line <br> No. | Title of Account <br> (a) | Ref. Page No. (b) | Current Year <br> End of Quarter/Year <br> Balance <br> (c) | Prior Year End Balance 12/31 <br> (d) |
| :---: | :---: | :---: | :---: | :---: |
| 53 | (Less) Noncurrent Portion of Allowances |  | 0 | 0 |
| 54 | Stores Expense Undistributed (163) | 227 | 1,259,187 | 0 |
| 55 | Gas Stored Underground - Current (164.1) |  | 0 | 0 |
| 56 | Liquefied Natural Gas Stored and Held for Processing (164.2-164.3) |  | 0 | 0 |
| 57 | Prepayments (165) |  | 34,977,531 | 889,698 |
| 58 | Advances for Gas (166-167) |  | 0 | 0 |
| 59 | Interest and Dividends Receivable (171) |  | 55,372 | 32,432 |
| 60 | Rents Receivable (172) |  | 2,563,994 | 1,281,981 |
| 61 | Accrued Utility Revenues (173) |  | 39,486,963 | 33,271,183 |
| 62 | Miscellaneous Current and Accrued Assets (174) |  | 1,331,031 | 4,599,707 |
| 63 | Derivative Instrument Assets (175) |  | 0 | 0 |
| 64 | (Less) Long-Term Portion of Derivative Instrument Assets (175) |  | 0 | 0 |
| 65 | Derivative Instrument Assets - Hedges (176) |  | 0 | 0 |
| 66 | (Less) Long-Term Portion of Derivative Instrument Assets - Hedges (176 |  | 0 | 0 |
| 67 | Total Current and Accrued Assets (Lines 34 through 66) |  | 246,987,623 | 210,382,427 |
| 68 | DEFERRED DEBITS |  |  |  |
| 69 | Unamortized Debt Expenses (181) |  | 8,048,622 | 7,758,855 |
| 70 | Extraordinary Property Losses (182.1) | 230a | 0 | 0 |
| 71 | Unrecovered Plant and Regulatory Study Costs (182.2) | 230b | 0 | 0 |
| 72 | Other Regulatory Assets (182.3) | 232 | 124,848,370 | 116,051,658 |
| 73 | Prelim. Survey and Investigation Charges (Electric) (183) |  | 0 | 0 |
| 74 | Preliminary Natural Gas Survey and Investigation Charges 183.1) |  | 0 | 0 |
| 75 | Other Preliminary Survey and Investigation Charges (183.2) |  | 0 | 0 |
| 76 | Clearing Accounts (184) |  | 111,287 | 0 |
| 77 | Temporary Facilities (185) |  | 0 | 0 |
| 78 | Miscellaneous Deferred Debits (186) | 233 | 67,649,047 | 71,332,263 |
| 79 | Def. Losses from Disposition of Utility Plt. (187) |  | 0 | 0 |
| 80 | Research, Devel. and Demonstration Expend. (188) | 352-353 | 0 | 0 |
| 81 | Unamortized Loss on Reaquired Debt (189) |  | 3,852,054 | 3,855,349 |
| 82 | Accumulated Deferred Income Taxes (190) | 234 | 151,739,990 | 154,947,755 |
| 83 | Unrecovered Purchased Gas Costs (191) |  | 0 | 0 |
| 84 | Total Deferred Debits (lines 69 through 83) |  | 356,249,370 | 353,945,880 |
| 85 | TOTAL ASSETS (lines 14-16, 32, 67, and 84) |  | 4,238,154,246 | 4,080,357,923 |


| Name of Respondent | This Report is: <br> (1) X An Original <br> $(2) ~ A ~ R e s u b m i s s i o n ~$ | Date of Report <br> (Mo, Da, Yr) <br> Atlantic City Electric Company | Year/Period of Report |  |  |
| :--- | :--- | :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |  | $2020 / Q 2$ |

## Schedule Page: 110 Line No.: 54 Column: c

The balance in Account 163 (Stores Expense Undistributed) should be at or near zero at the end of the year

## Schedule Page: 110 Line No.: 76 Column: c

The balance in Account 184 (Clearing Accounts) should be at or near zero at the end of the year

Name of Respondent Atlantic City Electric Company

This Report is:
(1) $x$ An Original
(2) $\square$ A Resubmission

Date of Report (mo, da, yr) 11

Year/Period of Report
end of
2020/Q2

Exhibit B-3 Page 4 of 5

## COMPARATIVE BALANCE SHEET (LIABILITIES AND OTHER CREDITS)

| Line <br> No. | Title of Account <br> (a) | Ref. Page No. <br> (b) | Current Year End of Quarter/Year Balance <br> (c) | Prior Year End Balance 12/31 <br> (d) |
| :---: | :---: | :---: | :---: | :---: |
| 1 | PROPRIETARY CAPITAL |  |  |  |
| 2 | Common Stock Issued (201) | 250-251 | 25,638,051 | 25,638,051 |
| 3 | Preferred Stock Issued (204) | 250-251 | 0 | 0 |
| 4 | Capital Stock Subscribed (202, 205) |  | 0 | 0 |
| 5 | Stock Liability for Conversion (203, 206) |  | 0 | 0 |
| 6 | Premium on Capital Stock (207) |  | 107,755,439 | 107,755,439 |
| 7 | Other Paid-In Capital (208-211) | 253 | 1,137,432,958 | 1,021,263,958 |
| 8 | Installments Received on Capital Stock (212) | 252 | 0 | 0 |
| 9 | (Less) Discount on Capital Stock (213) | 254 | 0 | 0 |
| 10 | (Less) Capital Stock Expense (214) | 254b | 532,682 | 532,682 |
| 11 | Retained Earnings (215, 215.1, 216) | 118-119 | 118,412,396 | 122,171,042 |
| 12 | Unappropriated Undistributed Subsidiary Earnings (216.1) | 118-119 | 0 | 0 |
| 13 | (Less) Reaquired Capital Stock (217) | 250-251 | 0 | 0 |
| 14 | Noncorporate Proprietorship (Non-major only) (218) |  | 0 | 0 |
| 15 | Accumulated Other Comprehensive Income (219) | 122(a)(b) | 0 | 0 |
| 16 | Total Proprietary Capital (lines 2 through 15) |  | 1,388,706,162 | 1,276,295,808 |
| 17 | LONG-TERM DEBT |  |  |  |
| 18 | Bonds (221) | 256-257 | 1,387,015,000 | 1,287,015,000 |
| 19 | (Less) Reaquired Bonds (222) | 256-257 | 0 | 0 |
| 20 | Advances from Associated Companies (223) | 256-257 | 18,944,088 | 26,383,829 |
| 21 | Other Long-Term Debt (224) | 256-257 | 0 | 0 |
| 22 | Unamortized Premium on Long-Term Debt (225) |  | 0 | 0 |
| 23 | (Less) Unamortized Discount on Long-Term Debt-Debit (226) |  | 520,829 | 562,786 |
| 24 | Total Long-Term Debt (lines 18 through 23) |  | 1,405,438,259 | 1,312,836,043 |
| 25 | OTHER NONCURRENT LIABILITIES |  |  |  |
| 26 | Obligations Under Capital Leases - Noncurrent (227) |  | 8,879,708 | 6,977,433 |
| 27 | Accumulated Provision for Property Insurance (228.1) |  | 0 | 0 |
| 28 | Accumulated Provision for Injuries and Damages (228.2) |  | 11,712,027 | 12,015,424 |
| 29 | Accumulated Provision for Pensions and Benefits (228.3) |  | 16,900,299 | 17,468,776 |
| 30 | Accumulated Miscellaneous Operating Provisions (228.4) |  | 298,111 | 339,020 |
| 31 | Accumulated Provision for Rate Refunds (229) |  | 0 | 0 |
| 32 | Long-Term Portion of Derivative Instrument Liabilities |  | 0 | 0 |
| 33 | Long-Term Portion of Derivative Instrument Liabilities - Hedges |  | 0 | 0 |
| 34 | Asset Retirement Obligations (230) |  | 4,085,263 | 4,103,099 |
| 35 | Total Other Noncurrent Liabilities (lines 26 through 34) |  | 41,875,408 | 40,903,752 |
| 36 | CURRENT AND ACCRUED LIABILITIES |  |  |  |
| 37 | Notes Payable (231) |  | 5,000,000 | 69,994,663 |
| 38 | Accounts Payable (232) |  | 133,215,285 | 117,035,133 |
| 39 | Notes Payable to Associated Companies (233) |  | 5,000,000 | 0 |
| 40 | Accounts Payable to Associated Companies (234) |  | 30,763,602 | 24,843,867 |
| 41 | Customer Deposits (235) |  | 23,751,856 | 25,129,483 |
| 42 | Taxes Accrued (236) | 262-263 | 7,759,965 | 8,060,491 |
| 43 | Interest Accrued (237) |  | 12,169,926 | 12,050,905 |
| 44 | Dividends Declared (238) |  | 0 | 0 |
| 45 | Matured Long-Term Debt (239) |  | 0 | 0 |



## Exhibit B-4

## Three Year Statement of Revenues by Class

Name of Respondent
Atlantic City Electric Company

1. The following instructions generally apply to the annual version of these pages. Do not report quarterly data in columns (c), (e), (f), and (g). Unbilled revenues and MWH related to unbilled revenues need not be reported separately as required in the annual version of these pages.
2. Report below operating revenues for each prescribed account, and manufactured gas revenues in total.
3. Report number of customers, columns ( f ) and ( g ), on the basis of meters, in addition to the number of flat rate accounts; except that where separate meter readings are added for billing purposes, one customer should be counted for each group of meters added. The -average number of customers means the average of twelve figures at the close of each month.
4. If increases or decreases from previous period (columns (c),(e), and (g)), are not derived from previously reported figures, explain any inconsistencies in a footnote.
5. Disclose amounts of $\$ 250,000$ or greater in a footnote for accounts 451,456 , and 457.2.

| $\begin{array}{\|c\|} \hline \text { Line } \\ \text { No. } \end{array}$ | Title of Account <br> (a) | Operating Revenues Year to Date Quarterly/Annual <br> (b) | Operating Revenues Previous year (no Quarterly) <br> (c) |
| :---: | :---: | :---: | :---: |
| 1 | Sales of Electricity |  |  |
| 2 | (440) Residential Sales | 658,690,866 | 660,698,892 |
| 3 | (442) Commercial and Industrial Sales |  |  |
| 4 | Small (or Comm.) (See Instr. 4) | 170,002,527 | 306,947,639 |
| 5 | Large (or Ind.) (See Instr. 4) | 180,215,607 | 33,452,748 |
| 6 | (444) Public Street and Highway Lighting | 12,786,001 | 12,205,744 |
| 7 | (445) Other Sales to Public Authorities |  |  |
| 8 | (446) Sales to Railroads and Railways |  |  |
| 9 | (448) Interdepartmental Sales |  |  |
| 10 | TOTAL Sales to Ultimate Consumers | 1,021,695,001 | 1,013,305,023 |
| 11 | (447) Sales for Resale | 60,269,069 | 94,904,164 |
| 12 | TOTAL Sales of Electricity | 1,081,964,070 | 1,108,209,187 |
| 13 | (Less) (449.1) Provision for Rate Refunds |  |  |
| 14 | TOTAL Revenues Net of Prov. for Refunds | 1,081,964,070 | 1,108,209,187 |
| 15 | Other Operating Revenues |  |  |
| 16 | (450) Forfeited Discounts | 240,365 | 233,914 |
| 17 | (451) Miscellaneous Service Revenues | 1,481,628 | 1,494,492 |
| 18 | (453) Sales of Water and Water Power |  |  |
| 19 | (454) Rent from Electric Property | 7,537,104 | 7,617,395 |
| 20 | (455) Interdepartmental Rents |  |  |
| 21 | (456) Other Electric Revenues | 7,991,176 | 8,062,187 |
| 22 | (456.1) Revenues from Transmission of Electricity of Others | 150,855,985 | 131,574,488 |
| 23 | (457.1) Regional Control Service Revenues |  |  |
| 24 | (457.2) Miscellaneous Revenues |  |  |
| 25 |  |  |  |
| 26 | TOTAL Other Operating Revenues | 168,106,258 | 148,982,476 |
| 27 | TOTAL Electric Operating Revenues | 1,250,070,328 | 1,257,191,663 |

Name of Respondent
Atlantic City Electric Company

This Report Is:
(1) X An Original
(2) $\square$ A Resubmission

Date of Report

ELECTRIC OPERATING REVENUES (Account 400)
6. Commercial and industrial Sales, Account 442, may be classified according to the basis of classification (Small or Commercial, and Large or Industrial) regularly used by the respondent if such basis of classification is not generally greater than 1000 Kw of demand. (See Account 442 of the Uniform System of Accounts. Explain basis of classification in a footnote.)
7. See pages 108-109, Important Changes During Period, for important new territory added and important rate increase or decreases.
8. For Lines $2,4,5$, and 6 , see Page 304 for amounts relating to unbilled revenue by accounts.
9. Include unmetered sales. Provide details of such Sales in a footnote.


Line 12, column (b) includes \$
Line 12, column (d) includes

1,630,067
$-9,666$
of unbilled revenues.
MWH relating to unbilled revenues

| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) X An Original <br> (2) A Resubmission | Date of Report (Mo, Da, Yr) 03/27/2020 | Year/Period of Report 2019/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |

Schedule Page: 300 Line No.: 17 Column: b

Amounts over \$250,000
Connect Charges \$ \$ 1,450,100

## Schedule Page: 300 Line No.: 17 Column: c

Amounts over \$250,000
Connect Charges \$ 1,543,730

Schedule Page: 300 Line No.: 21 Column: b

| Amounts over $\$ 250,000$ | $1,103,539$ |
| :--- | ---: |
| Intercompany Power Sales | $1,544,280$ |
| Intercompany Revenue Previously Recorded to Contra Expense | 518,531 |
| Solar Renewable Energy Credits Transaction Fee | 632,895 |
| Net Energy Metering | 377,489 |
| Electric Revenue NUGs | $2,878,135$ |
| RPM Auction | 388,615 |
| Company Use Utilities | 516,054 |

Schedule Page: 300 Line No.: 21 Column: c

## Amounts over \$250,000

| Intercompany Power Sales | $1,171,051$ |
| :--- | ---: |
| Intercompany Revenue Previously Recorded to Contra Expense | $1,693,410$ |
| Solar Renewable Energy Credits Transaction Fee | 436,845 |
| Net Energy Metering | 622,323 |
| Electric Revenue NUGs | 374,779 |
| RPM Auction | $3,441,468$ |

Year/Period of Report
End of 2019/Q4

SALES OF ELECTRICITY BY RATE SCHEDULES

1. Report below for each rate schedule in effect during the year the MWH of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Pages 310-311.
2. Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300-301. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading.
3. Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and an off peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of reported customers.
4. The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year ( 12 if all billings are made monthly).
5. For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto.
6. Report amount of unbilled revenue as of end of year for each applicable revenue account subheading.

| Line No. | Number and Title of Rate schedule <br> (a) | MWh Sold <br> (b) | Revenue <br> (c) | Average Number of Customers <br> (d) | KWh of Sales Per Customer (e) | $\begin{aligned} & \text { Revenue Per } \\ & \text { KWh Sold } \end{aligned}$ <br> (f) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 440 - Residential Sales |  |  |  |  |  |
| 2 | R - Residential Sales | 3,976,055 | 659,467,468 | 493,023 | 8,065 | 0.1659 |
| 3 | PL - Private Area Lighting |  |  |  |  |  |
| 4 | Unbilled Revenue | -9,814 | -776,602 |  |  | 0.0791 |
| 5 | Total | 3,966,241 | 658,690,866 | 493,023 | 8,045 | 0.1661 |
| 6 |  |  |  |  |  |  |
| 7 |  |  |  |  |  |  |
| 8 | 442 - Commerical \& Industrial Sal |  |  |  |  |  |
| 9 | MGS | 1,318,950 | 162,806,939 | 55,511 | 23,760 | 0.1234 |
| 10 | AGS | 2,348,683 | 134,666,451 | 3,405 | 689,775 | 0.0573 |
| 11 | TGS | 1,066,639 | 42,925,037 | 53 | 20,125,264 | 0.0402 |
| 12 | SPL | 25,928 | 6,657,621 | 5,036 | 5,149 | 0.2568 |
| 13 | DDC | 13,984 | 848,160 | 860 | 16,260 | 0.0607 |
| 14 | CSL | 2 | 212 | 1 | 2,000 | 0.1060 |
| 15 | Unbilled Revenue Ind. | 347 | 2,313,714 |  |  | 6.6678 |
| 16 | Total | 4,774,533 | 350,218,134 | 64,866 | 73,606 | 0.0734 |
| 17 |  |  |  |  |  |  |
| 18 | 444 - Public Street \& Highway Lig |  |  |  |  |  |
| 19 | SI - Street Lighting | 47,350 | 12,693,046 | 670 | 70,672 | 0.2681 |
| 20 | Unbilled Revenue | -199 | 92,955 |  |  | -0.4671 |
| 21 | Total | 47,151 | 12,786,001 | 670 | 70,375 | 0.2712 |
| 22 |  |  |  |  |  |  |
| 23 |  |  |  |  |  |  |
| 24 |  |  |  |  |  |  |
| 25 |  |  |  |  |  |  |
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| 31 |  |  |  |  |  |  |
| 32 |  |  |  |  |  |  |
| 33 |  |  |  |  |  |  |
| 34 |  |  |  |  |  |  |
| 35 |  |  |  |  |  |  |
| 36 |  |  |  |  |  |  |
| 37 |  |  |  |  |  |  |
| 38 |  |  |  |  |  |  |
| 39 |  |  |  |  |  |  |
| 40 |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| 41 | TOTAL Billed | 8,797,591 | 1,020,064,934 | 558,559 | 15,751 | 0.1159 |
| 42 | Total Unbilled Rev.(See Instr. 6) | -9,666 | 1,630,067 | 0 | 0 | -0.1686 |
| 43 | TOTAL | 8,787,925 | 1,021,695,001 | 558,559 | 15,733 | 0.1163 |

FERC FORM NO. 1 (ED. 12-95)
Page 304

1. The following instructions generally apply to the annual version of these pages. Do not report quarterly data in columns (c), (e), (f), and (g). Unbilled revenues and MWH related to unbilled revenues need not be reported separately as required in the annual version of these pages.
2. Report below operating revenues for each prescribed account, and manufactured gas revenues in total.
3. Report number of customers, columns ( f ) and ( g ), on the basis of meters, in addition to the number of flat rate accounts; except that where separate meter readings are added for billing purposes, one customer should be counted for each group of meters added. The -average number of customers means the average of twelve figures at the close of each month.
4. If increases or decreases from previous period (columns (c),(e), and (g)), are not derived from previously reported figures, explain any inconsistencies in a footnote.
5. Disclose amounts of $\$ 250,000$ or greater in a footnote for accounts 451,456 , and 457.2.

| Line No. | Title of Account <br> (a) | Operating Revenues Year to Date Quarterly/Annual <br> (b) | Operating Revenues Previous year (no Quarterly) <br> (c) |
| :---: | :---: | :---: | :---: |
| 1 | Sales of Electricity |  |  |
| 2 | (440) Residential Sales | 660,698,892 | 618,827,614 |
| 3 | (442) Commercial and Industrial Sales |  |  |
| 4 | Small (or Comm.) (See Instr. 4) | 306,947,639 | 319,872,604 |
| 5 | Large (or Ind.) (See Instr. 4) | 33,452,748 | 35,689,437 |
| 6 | (444) Public Street and Highway Lighting | 12,205,744 | 12,939,546 |
| 7 | (445) Other Sales to Public Authorities |  |  |
| 8 | (446) Sales to Railroads and Railways |  |  |
| 9 | (448) Interdepartmental Sales |  |  |
| 10 | TOTAL Sales to Ultimate Consumers | 1,013,305,023 | 987,329,201 |
| 11 | (447) Sales for Resale | 94,904,164 | 63,000,541 |
| 12 | TOTAL Sales of Electricity | 1,108,209,187 | 1,050,329,742 |
| 13 | (Less) (449.1) Provision for Rate Refunds |  |  |
| 14 | TOTAL Revenues Net of Prov. for Refunds | 1,108,209,187 | 1,050,329,742 |
| 15 | Other Operating Revenues |  |  |
| 16 | (450) Forfeited Discounts | 233,914 | 212,671 |
| 17 | (451) Miscellaneous Service Revenues | 1,494,492 | 898,639 |
| 18 | (453) Sales of Water and Water Power |  |  |
| 19 | (454) Rent from Electric Property | 7,617,395 | 7,850,958 |
| 20 | (455) Interdepartmental Rents |  |  |
| 21 | (456) Other Electric Revenues | 8,062,187 | 5,124,067 |
| 22 | (456.1) Revenues from Transmission of Electricity of Others | 131,574,488 | 135,191,410 |
| 23 | (457.1) Regional Control Service Revenues |  |  |
| 24 | (457.2) Miscellaneous Revenues |  |  |
| 25 |  |  |  |
| 26 | TOTAL Other Operating Revenues | 148,982,476 | 149,277,745 |
| 27 | TOTAL Electric Operating Revenues | 1,257,191,663 | 1,199,607,487 |
| 27 | TOTAL Electric Operating Revenues | 1,257,191,663 | 1,199,607,487 |

Name of Respondent
Atlantic City Electric Company

This Report IS:
(1) $X$ An Original
(2) $\square$ A Resubmission

Date of Report

ELECTRIC OPERATING REVENUES (Account 400)
6. Commercial and industrial Sales, Account 442, may be classified according to the basis of classification (Small or Commercial, and Large or Industrial) regularly used by the respondent if such basis of classification is not generally greater than 1000 Kw of demand. (See Account 442 of the Uniform System of Accounts. Explain basis of classification in a footnote.)
7. See pages 108-109, Important Changes During Period, for important new territory added and important rate increase or decreases.
8. For Lines $2,4,5$, and 6 , see Page 304 for amounts relating to unbilled revenue by accounts.
9. Include unmetered sales. Provide details of such Sales in a footnote.

| MEGAWATT HOURS SOLD |  | AVG.NO. CUSTOMERS PER MONTH |  | Line <br> No. |
| :---: | :---: | :---: | :---: | :---: |
| Year to Date Quarterly/Annual <br> (d) | Amount Previous year (no Quarterly) <br> (e) | Current Year (no Quarterly) <br> (f) | Previous Year (no Quarterly) <br> (g) |  |
|  |  |  |  | 1 |
| 4,184,905 | 3,852,704 | 489,453 | 485,990 | 2 |
|  |  |  |  | 3 |
| 4,129,259 | 3,943,533 | 64,013 | 63,912 | 4 |
| 797,037 | 741,851 | 763 | 805 | 5 |
| 48,577 | 46,465 | 652 | 625 | 6 |
|  |  |  |  | 7 |
|  |  |  |  | 8 |
|  |  |  |  | 9 |
| 9,159,778 | 8,584,553 | 554,881 | 551,332 | 10 |
| 1,405,137 | 1,238,364 |  |  | 11 |
| 10,564,915 | 9,822,917 | 554,881 | 551,332 | 12 |
|  |  |  |  | 13 |
|  |  |  |  |  |
| 10,564,915 | 9,822,917 | 554,881 | 551,332 | 14 |

Line 12, column (b) includes \$
Line 12, column (d) includes
-837,238 of unbilled revenues.
30,457 MWH relating to unbilled revenues

| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) $X$ An Original <br> (2) _ A Resubmission | Date of Report (Mo, Da, Yr) 04/02/2019 | Year/Period of Report 2018/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |

Schedule Page: 300 Line No.: 17 Column: b

    Amounts over \$250,000
    
    Connect Charges
    
    \$1,543,730
    ```
Schedule Page: 300 Line No.: 17 Column: c
    Amounts over \$250,000
    Connect Charges \$ 871,990
```

Schedule Page: $300 \quad$ Line No.: $21 \quad$ Column: b

```
    Amounts over $250,000
    Intercompany Power Sales $1,171,051
    Intercompany Revenue Previously Recorded to Contra Expense 1,693,410
    Solar Renewable Energy Credits Transaction Fee
        436,845
    Net Energy Metering
    Electric Revenue NUGs
    $ 374,779
    RPM Auction
    $3,441,468
```

Schedule Page: 300 Line No.: 21 Column: c
Amounts over \$250,000
Intercompany
\$1,230,027
Net Energy Metering
373,709
Electric Revenue NUGs
372,708
Solar Renewable Energy Credits Transaction Fee
\$ 435,513

NOTE: $\$ 2,469,069$ of $R P M$ auction revenue has been reclassified from Line 11, Column c to Line 21, Column c to conform to the current period presentation.

Year/Period of Report End of 2018/Q4

SALES OF ELECTRICITY BY RATE SCHEDULES

1. Report below for each rate schedule in effect during the year the MWH of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Pages 310-311.
2. Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300-301. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading.
3. Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and an off peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of reported customers.
4. The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year ( 12 if all billings are made monthly).
5. For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto.
6. Report amount of unbilled revenue as of end of year for each applicable revenue account subheading.

| Line No. | Number and Title of Rate schedule <br> (a) | MWh Sold <br> (b) | Revenue <br> (c) | Average Number of Customers <br> (d) | KWh of Sales Per Customer (e) | Revenue Per (f) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 440 - Residential Sales |  |  |  |  |  |
| 2 | R - Residential Sales | 4,169,648 | 659,426,594 | 489,453 | 8,519 | 0.1581 |
| 3 | PL - Private Area Lighting |  |  |  |  |  |
| 4 | Unbilled Revenue | 15,257 | 1,272,298 |  |  | 0.0834 |
| 5 | Total | 4,184,905 | 660,698,892 | 489,453 | 8,550 | 0.1579 |
| 6 |  |  |  |  |  |  |
| 7 |  |  |  |  |  |  |
| 8 | 442 - Commerical \& Industrial Sal |  |  |  |  |  |
| 9 | MGS | 1,318,459 | 155,615,496 | 55,171 | 23,898 | 0.1180 |
| 10 | AGS | 2,510,444 | 132,751,313 | 3,536 | 709,967 | 0.0529 |
| 11 | TGS | 1,041,359 | 46,536,069 | 53 | 19,648,283 | 0.0447 |
| 12 | SPL | 26,777 | 6,558,823 | 5,156 | 5,193 | 0.2449 |
| 13 | DDC | 14,046 | 882,398 | 859 | 16,352 | 0.0628 |
| 14 | CSL | 3 | 244 | 1 | 3,000 | 0.0813 |
| 15 | Unbilled Revenue Ind. | 15,208 | -1,943,956 |  |  | -0.1278 |
| 16 | Total | 4,926,296 | 340,400,387 | 64,776 | 76,051 | 0.0691 |
| 17 |  |  |  |  |  |  |
| 18 | 444 - Public Street \& Highway Lig | 48,585 | 12,371,324 | 652 | 74,517 | 0.2546 |
| 19 | SI - Street Lighting |  |  |  |  |  |
| 20 | Unbilled Revenue | -8 | -165,580 |  |  | 20.6975 |
| 21 | Total | 48,577 | 12,205,744 | 652 | 74,505 | 0.2513 |
| 22 |  |  |  |  |  |  |
| 23 |  |  |  |  |  |  |
| 24 |  |  |  |  |  |  |
| 25 |  |  |  |  |  |  |
| 26 |  |  |  |  |  |  |
| 27 |  |  |  |  |  |  |
| 28 |  |  |  |  |  |  |
| 29 |  |  |  |  |  |  |
| 30 |  |  |  |  |  |  |
| 31 |  |  |  |  |  |  |
| 32 |  |  |  |  |  |  |
| 33 |  |  |  |  |  |  |
| 34 |  |  |  |  |  |  |
| 35 |  |  |  |  |  |  |
| 36 |  |  |  |  |  |  |
| 37 |  |  |  |  |  |  |
| 38 |  |  |  |  |  |  |
| 39 |  |  |  |  |  |  |
| 40 |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| 41 | TOTAL Billed | 9,129,321 | 1,014,142,261 | 554,881 | 16,453 | 0.1111 |
| 42 | Total Unbilled Rev.(See Instr. 6) | 30,457 | -837,238 | 0 | 0 | -0.0275 |
| 43 | TOTAL | 9,159,778 | 1,013,305,023 | 554,881 | 16,508 | 0.1106 |

FERC FORM NO. 1 (ED. 12-95)
Page 304

1. The following instructions generally apply to the annual version of these pages. Do not report quarterly data in columns (c), (e), (f), and (g). Unbilled revenues and MWH related to unbilled revenues need not be reported separately as required in the annual version of these pages.
2. Report below operating revenues for each prescribed account, and manufactured gas revenues in total.
3. Report number of customers, columns ( f ) and ( g ), on the basis of meters, in addition to the number of flat rate accounts; except that where separate meter readings are added for billing purposes, one customer should be counted for each group of meters added. The -average number of customers means the average of twelve figures at the close of each month.
4. If increases or decreases from previous period (columns (c),(e), and (g)), are not derived from previously reported figures, explain any inconsistencies in a footnote.
5. Disclose amounts of $\$ 250,000$ or greater in a footnote for accounts 451,456 , and 457.2.

| $\begin{array}{\|c\|} \hline \text { Line } \\ \text { No. } \end{array}$ | Title of Account <br> (a) | Operating Revenues Year to Date Quarterly/Annual <br> (b) | Operating Revenues Previous year (no Quarterly) <br> (c) |
| :---: | :---: | :---: | :---: |
| 1 | Sales of Electricity |  |  |
| 2 | (440) Residential Sales | 618,827,614 | 664,360,451 |
| 3 | (442) Commercial and Industrial Sales |  |  |
| 4 | Small (or Comm.) (See Instr. 4) | 319,872,604 | 344,069,845 |
| 5 | Large (or Ind.) (See Instr. 4) | 35,689,437 | 39,539,253 |
| 6 | (444) Public Street and Highway Lighting | 12,939,546 | 12,796,381 |
| 7 | (445) Other Sales to Public Authorities |  |  |
| 8 | (446) Sales to Railroads and Railways |  |  |
| 9 | (448) Interdepartmental Sales |  |  |
| 10 | TOTAL Sales to Ultimate Consumers | 987,329,201 | 1,060,765,930 |
| 11 | (447) Sales for Resale | 65,465,751 | 80,934,046 |
| 12 | TOTAL Sales of Electricity | 1,052,794,952 | 1,141,699,976 |
| 13 | (Less) (449.1) Provision for Rate Refunds |  |  |
| 14 | TOTAL Revenues Net of Prov. for Refunds | 1,052,794,952 | 1,141,699,976 |
| 15 | Other Operating Revenues |  |  |
| 16 | (450) Forfeited Discounts | 212,671 | 249,141 |
| 17 | (451) Miscellaneous Service Revenues | 898,639 | 1,157,739 |
| 18 | (453) Sales of Water and Water Power |  |  |
| 19 | (454) Rent from Electric Property | 7,850,958 | 7,881,058 |
| 20 | (455) Interdepartmental Rents |  |  |
| 21 | (456) Other Electric Revenues | 2,658,857 | 3,633,642 |
| 22 | (456.1) Revenues from Transmission of Electricity of Others | 135,191,410 | 113,830,086 |
| 23 | (457.1) Regional Control Service Revenues |  |  |
| 24 | (457.2) Miscellaneous Revenues |  |  |
| 25 |  |  |  |
| 26 | TOTAL Other Operating Revenues | 146,812,535 | 126,751,666 |
| 27 | TOTAL Electric Operating Revenues | 1,199,607,487 | 1,268,451,642 |

Name of Respondent
Atlantic City Electric Company

This Report IS:
(1) X|An Original
(2)

Resubmission
ELECTRIC OPERATING REVENUES (Account 400)
6. Commercial and industrial Sales, Account 442, may be classified according to the basis of classification (Small or Commercial, and Large or Industrial) regularly used by the respondent if such basis of classification is not generally greater than 1000 Kw of demand. (See Account 442 of the Uniform System of Accounts. Explain basis of classification in a footnote.)
7. See pages 108-109, Important Changes During Period, for important new territory added and important rate increase or decreases.
8. For Lines $2,4,5$, and 6 , see Page 304 for amounts relating to unbilled revenue by accounts.
9. Include unmetered sales. Provide details of such Sales in a footnote.


Line 12, column (b) includes \$
Line 12, column (d) includes
$-10,231,328$ of unbilled revenues.
$-72,281 \mathrm{MWH}$ relating to unbilled revenues

Exhibit B-4 Page 11 of 12

| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) $X$ An Original <br> (2) <br> A Resubmission | Date of Report (Mo, Da, Yr) | Year/Period of Report 2017/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |

Schedule Page: 300 Line No.: 17 Column: b

|  |  |
| :--- | :--- | :--- |
| Amounts over \$250,000 |  |
| Connect Charges | $\$ 871,990$ |

Schedule Page: 300 Line No.: 21 Column: b

|  |  |  |
| :--- | ---: | ---: |
| Amounts over \$250,000 |  |  |
| Intercompany | $\$$ | $1,230,027$ |
| Net Energy Metering | $\$$ | 373,709 |
| Electric Revenue NUGs | $\$$ | 372,708 |
| Solar Renewable Energy Credits Transaction Fee | $\$$ | 435,513 |

Year/Period of Report
End of 2017/Q4

Exhibit B-4 age 12 of 12

1. Report below for each rate schedule in effect during the year the MWH of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Pages 310-311.
2. Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300-301. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading.
3. Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and an off peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of reported customers.
4. The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year (12 if all billings are made monthly).
5. For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto.
6. Report amount of unbilled revenue as of end of year for each applicable revenue account subheading.

| Line <br> No. | Number and Title of Rate schedule <br> (a) | MWh Sold <br> (b) | Revenue <br> (c) | Average Number of Customers <br> (d) | KWh of Sales Per Customer <br> (e) | $\begin{aligned} & \text { Revenue per } \\ & \text { KWh Sold } \end{aligned}$ <br> (f) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 440 - Residential Sales |  |  |  |  |  |
| 2 | R - Residential Sales | 3,888,407 | 624,598,258 | 485,990 | 8,001 | 0.1606 |
| 3 | PL - Private Area Lighting |  |  |  |  |  |
| 4 | Unbilled Revenue | -35,703 | -5,770,644 |  |  | 0.1616 |
| 5 | Total | 3,852,704 | 618,827,614 | 485,990 | 7,928 | 0.1606 |
| 6 |  |  |  |  |  |  |
| 7 |  |  |  |  |  |  |
| 8 | 442 - Commerical \& Industrial Sal |  |  |  |  |  |
| 9 | MGS | 1,255,740 | 160,694,719 | 55,003 | 22,830 | 0.1280 |
| 10 | AGS | 2,501,724 | 146,805,611 | 3,688 | 678,342 | 0.0587 |
| 11 | TGS | 923,810 | 44,514,670 | 53 | 17,430,377 | 0.0482 |
| 12 | SPL | 27,430 | 7,026,079 | 5,326 | 5,150 | 0.2561 |
| 13 | DDC | 12,843 | 922,405 | 646 | 19,881 | 0.0718 |
| 14 | CSL | 3 | 274 | 1 | 3,000 | 0.0913 |
| 15 | Unbilled Revenue Ind. | -36,166 | -4,401,718 |  |  | 0.1217 |
| 16 | Total | 4,685,384 | 355,562,040 | 64,717 | 72,398 | 0.0759 |
| 17 |  |  |  |  |  |  |
| 18 | 444 - Public Street \& Highway Lig | 46,877 | 12,998,513 | 625 | 75,003 | 0.2773 |
| 19 | SI - Street Lighting |  |  |  |  |  |
| 20 | Unbilled Revenue | -412 | -58,966 |  |  | 0.1431 |
| 21 | Total | 46,465 | 12,939,547 | 625 | 74,344 | 0.2785 |
| 22 |  |  |  |  |  |  |
| 23 |  |  |  |  |  |  |
| 24 |  |  |  |  |  |  |
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| 39 |  |  |  |  |  |  |
| 40 |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| 41 | TOTAL Billed | 8,656,834 | 997,560,529 | 551,332 | 15,702 | 0.1152 |
| 42 | Total Unbilled Rev.(See Instr. 6) | -72,281 | -10,231,328 | 0 | 0 | 0.1415 |
| 43 | TOTAL | 8,584,553 | 987,329,201 | 551,332 | 15,571 | 0.1150 |

## Exhibit B-5

Three Year Affiliated Transactions

Name of Respondent
Atlantic City Electric Company

This Report Is:
(1) $X$ An Original
(2) $\square$ A Resubmission

TRANSACTIONS WITH ASSOCIATED (AFFILIATED) COMPANIES

1. Report below the information called for concerning all non-power goods or services received from or provided to associated (affiliated) companies.
2. The reporting threshold for reporting purposes is $\$ 250,000$. The threshold applies to the annual amount billed to the respondent or billed to an associated/affiliated company for non-power goods and services. The good or service must be specific in nature. Respondents should not attempt to include or aggregate amounts in a nonspecific category such as "general".
3. Where amounts billed to or received from the associated (affiliated) company are based on an allocation process, explain in a footnote.

| $\begin{array}{c}\text { Line } \\ \text { No. }\end{array}$ | $\begin{array}{c}\text { Description of the Non-Power Good or Service } \\ \end{array}$ |
| :---: | :---: |

Non-power Goods or Services Provided by Affiliated PHI Service Company (PHISCO)

Centralized Support Services

Exelon Business Services Company (EBSC)
Centralized Support Services

Baltimore Gas \& Electric Company (BGE)
Information Technology Services
Materials

PECO Energy Company (PECO)
Extra-High Voltage (EHV) Transmission Agreement Information Technology Services
Materials

Commonwealth Edison Company (ComEd)
Information Technology Services
Materials
Non-power Goods or Services Provided for Affiliate
Potomac Electric Power Company (PEPCO)
Materials
Building Services (use of building space)

Constellation New Energy (CNE)
Building Services (use of building space)

PHI Service Company (PHISCO)
Building Services (use of building space)
Vehicle Services

Delmarva Power Company (DPL)
Materials
Building Services (use of building space)

Commonwealth Edison Company
Mutual Assistance

Atlantic Southern Properties (ASP)
Building Services (use of building space)
$\qquad$
$\qquad$


Non-power Goods or Services Provided by Affiliated Constellation Power Source Generation (CPSG)

TRANSACTIONS WITH ASSOCIATED (AFFILIATED) COMPANIES

1. Report below the information called for concerning all non-power goods or services received from or provided to associated (affiliated) companies.
2. The reporting threshold for reporting purposes is $\$ 250,000$. The threshold applies to the annual amount billed to the respondent or billed to an associated/affiliated company for non-power goods and services. The good or service must be specific in nature. Respondents should not attempt to include or aggregate amounts in a nonspecific category such as "general".
3. Where amounts billed to or received from the associated (affiliated) company are based on an allocation process, explain in a footnote.


| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) $X$ An Original <br> (2) A Resubmission | Date of Report (Mo, Da, Yr) 03/27/2020 | Year/Period of Report 2019/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |

## Schedule Page: 429 Line No.: 2 Column: a

PHI Service Company (PHISCO) Overview
Services provided by PHISCO are provided under a Service Agreement with Atlantic City Electric Company (ACE). Charges are provided by either direct charging of costs or are based on an allocation. The Service Agreement provides specific guidelines on the allocation methods used to charge these costs to the various PHI affiliates. Information on the Service Company allocation methods are explained in detail under Schedule XXI, Methods of Allocations, in the FERC Form 60 filed for PHISCO.

PHISCO provides a variety of services which include customer services, support services, financial services, human resources, legal services, information technology, governmental affairs, communication services, regulatory services, regulated gas and electric (transmission and distribution services), executive management, and supply services.

The services provided by the regulated gas and electric area include: system operations services; meter maintenance and testing; power procurement and energy planning; and other delivery services, including delivery senior management, asset management, engineering standards, interconnection planning and arrangements, distribution and transmission planning, engineering services for distribution, substation and transmission, system protection, project and construction management, electric maintenance, administrative support, process improvement, and performance analysis,

## Schedule Page: 429 Line No.: 3 Column: c

PHISCO Centralized Support Services to Pepco

| FERC |  |  |
| :---: | :---: | :---: |
| account | Amount |  |
| 107 | \$ | 16,017,260 |
| 108 |  | 1,851,771 |
| 163 |  | 606,970 |
| 182.3 |  | 111,919 |
| 184 |  | 1,208,585 |
| 416 |  | 121,579 |
| 419 |  | $(181,158)$ |
| 426.1 |  | 67,561 |
| 426.3 |  | 6 |
| 426.4 |  | 80,518 |
| 426.5 |  | 599,574 |
| 430 |  | 1,935 |
| 431 |  | 49,822 |
| 556 |  | 1,424,155 |
| 557 |  | 709,648 |
| 560 |  | 591,552 |
| 561.1 |  | 433 |
| 561.2 |  | 1,036 |
| 561.3 |  | 1,164 |
| 561.5 |  | 5,206 |
| 566 |  | 1,455,412 |
| 568 |  | 6,115 |
| 569 |  | 302 |
| 569.2 |  | (1) |
| 570 |  | 150,721 |
| 571 |  | 373,146 |
| 573 |  | (673) |
| 580 |  | 488,161 |
| 581 |  | 101,668 |
| 582 |  | 1,885 |
| 583 |  | 1,135 |
| 584 |  | 24,259 |
| 586 |  | 197,670 |
| 587 |  | 168,410 |
| 588 |  | 1,653,974 |
| 589 |  | (2) |
| 590 |  | 6,104 |
| 591 |  | 84 |
| 592 |  | 177,026 |
| 593 |  | 592,352 |
| 594 |  | 562 |
| 595 |  | 74 |
| 596 |  | 128 |
| 597 |  | 2 |
| 598 |  | 21,032 |
| 902 |  | 291,165 |
| 903 |  | 38,283,600 |
| 904 |  | 140 |
| 907 |  | 85,509 |
| 908 |  | 267,258 |
| 909 |  | 108,708 |
| 923 |  | 39,433,285 |


| Name of Respondent <br> Atlantic City Electric Company |  |  |
| :---: | :---: | :---: |
| 924 |  | $(5,927)$ |
| 925 |  | 299 |
| 928 |  | 400,118 |
| 930.1 |  | 329,987 |
| 930.2 |  | 581,315 |
| Total | \$ | 108,464,539 |

## Schedule Page: 429 Line No.: 5 Column: a

 Exelon Business Servicas Company, LLC (EBSC) OverviewServices provided by EBSC are provided under a General Service Agreement with ACE
Charges are provided by either direct charging of costs or are based on an allocation.
The factors for allocating the costs from EBSC to Exelon affiliates are contained in the
General Services Agreement. Information on the EBSC allocation methods are explained in
detail under Schedule XXI, Methods of Allocations, in the FERC Form 60 filed for EBSC.
EBSC provides a variety of support services, including: financial, human resources
IT, communication, legal, governmental and regulatory affairs, executive, security,
supply, Exelon Utilities, BSC Operations, real estate, and other.
Schedule Page: 429 Line No.: 6 Column: c
EBSC Centralized Support Services to Pepco

FERC

107
108
163
184
416
417.1
426.1
426.3
426.4
426.5

557
560
561.1
561.2
561.3

566
568
569
569.2

570 98,761
571
573
580
581
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902
904
908
921
923 924 925

| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) $X$ An Original <br> (2) _A Resubmission | Date of Report (Mo, Da, Yr) 03/27/2020 | Year/Period of Report 2019/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |

Total | 62.729.485 |
| :--- |

Schedule Page: 429 Line No.: 9 Column: c
BGE Information Technology Services provided to ACE:

| FERC | Amount |  |
| :---: | :---: | :---: |
| 107 | \$ | -37,681 |
| 921 |  | 35,529 |
| Total | \$ | 73,210 |

Schedule Page: 429 Line No.: 14 Column: c
PECO Information Technology Services provided to ACE

| FERC | Amount |  |
| :---: | :---: | :---: |
| 107 | \$ | 6,768 |
| 921 |  | 18,070 |
|  | \$ | 24,838 |

## Schedule Page: 429 Line No.: 18 Column: c

ComEd Information Technology Services
provided to ACE:

| FERC | Amount |  |
| :---: | :---: | :---: |
| 107 | \$ | 79,084 |
| 921 |  | 14,968 |
| Total | \$ | 94,052 |

Schedule Page: 429 Line No.: 19 Column: c ComEd Materials provided to ACE:

| FERC | Amount |  |
| :---: | :---: | :---: |
| 107 | \$ | 2,444 |
| 108 |  | 611 |
| Total | \$ | 3,055 |

Schedule Page: 429.1 Line No.: 3 Column: c
CPSG Mechanical and Electrical Industrial Services provided to ACE:

| FER | \$ |  |
| :---: | :---: | :---: |
| C |  | Amount |
| 107 |  | 74,409 |
| 108 |  | 19,770 |
| 570 |  | 2,991 |
| Total |  | 97,170 |

Schedule Page: 429.1 Line No.: 9 Column: c
DPL Materials provided to ACE:

| FERC |  | Amount |  |
| :--- | ---: | ---: | :---: |
| 107 | $\$$ | 155,224 |  |
| 108 | 6,938 |  |  |
| 154 |  | 943,934 |  |
| 571 |  | 34,246 |  |
| 588 |  | 263 |  |
| Total |  | $1,140,605$ |  |

Schedule Page: 429.1 Line No.: 11 Column: c
DPL Field Operations Services provided to
ACE:

| FERC | Amount |  |
| :---: | :---: | :---: |
| 107 | \$ | 3,239 |
| 108 |  | 135 |
| 921 |  | 14,736 |
|  | \$ | 18,110 |


| Schedule Page: 429.1 Line No.: 16 Column: $\boldsymbol{c}$ <br> Pepco Materials provided to ACE:   <br> FERC FORM NO. 1 (ED. 12-87) Page 450.3  |
| :--- | :--- | :--- |

Exhibit B-5
Page 6 of 20

| Name of Respondent <br> Atlantic City Electric Company |  |  |
| :---: | :---: | :---: |
| FERC . | Amount |  |
| 107 | \$ | 843,526 |
| 108 |  | 20,863 |
| 154 |  | 240,618 |
| Total | \$ | ,105,007 |

Schedule Page: 429.1 Line No.: 17 Column: c Pepco Shops Department Fabrication Services provided to ACE

| FERC |
| :--- | ---: | ---: |
| 107 |
| 108 |$\quad \$$| Amount |
| ---: |
|  |$\quad$| 121,930 |
| ---: |
|  |


| Schedule Page: 429.1 Line No.: 31 Column: $\mathbf{c}$ |
| :--- |
| ACE Facility Services provided to EBSC |

ACE Facility Services provided to EBSC

| FER | Amount |  |
| :---: | :---: | :---: |
| C |  |  |
| 456 | \$ | 45,523 |
| 456.1 |  | 6,180 |
| Total | \$ | 51,703 |

Name of Respondent

TRANSACTIONS WITH ASSOCIATED (AFFILIATED) COMPANIES

1. Report below the information called for concerning all non-power goods or services received from or provided to associated (affiliated) companies.
2. The reporting threshold for reporting purposes is $\$ 250,000$. The threshold applies to the annual amount billed to the respondent or billed to an associated/affiliated company for non-power goods and services. The good or service must be specific in nature. Respondents should not attempt to include or aggregate amounts in a nonspecific category such as "general".
3. Where amounts billed to or received from the associated (affiliated) company are based on an allocation process, explain in a footnote.

| Line <br> No. | Description of the Non-Power Good or Service |
| :---: | :---: |
|  | (a) |

Non-power Goods or Services Provided by Affiliated PHI Service Company (PHISCO)

Centralized Support Services

Exelon Business Services Company (EBSC)
Centralized Support Services

Baltimore Gas \& Electric Company (BGE)
Information Technology Services
Field Operations Services

PECO Energy Company (PECO)
Mutual Assistance-Storm Services
Information Technology Services
Extra-High Voltage (EHV) Transmission Agreement

Commonwealth Edison Company (ComEd)
Information Technology Services

Non-power Goods or Services Provided for Affiliate
Potomac Electric Power Company (PEPCO)
Materials

Constellation New Energy (CNE)
Facility Services

PHI Service Company (PHISCO)
Building Services (use of building space)
Vehicle Services

Delmarva Power Company (DPL)
Materials
Facility Services

Commonwealth Edison Company
Mutual assistance - Storm Services

Atlantic Southern Properties (ASP)
Facility Services

Exelon Business Services Company (EBSC)
Facility Services
Non-power Goods or Services Provided by Affiliated

Year/Period of Report End of 2018/Q4

TRANSACTIONS WITH ASSOCIATED (AFFILIATED) COMPANIES

1. Report below the information called for concerning all non-power goods or services received from or provided to associated (affiliated) companies.
2. The reporting threshold for reporting purposes is $\$ 250,000$. The threshold applies to the annual amount billed to the respondent or billed to an associated/affiliated company for non-power goods and services. The good or service must be specific in nature. Respondents should not attempt to include or aggregate amounts in a nonspecific category such as "general".
3. Where amounts billed to or received from the associated (affiliated) company are based on an allocation process, explain in a footnote.

| $\begin{array}{\|c\|c} \hline \text { Line } \\ \text { No. } \end{array}$ | Description of the Non-Power Good or Service <br> (a) | Name of Associated/Affiliated Company <br> (b) | Account Charged or Credited (c) | Amount Charged or Credited (d) |
| :---: | :---: | :---: | :---: | :---: |
| 3 | Constellation Power Source Generation (CPSG) |  |  |  |
| 4 | Mechanical and Electrical Industrial Services | (CPSG) | Various | 501,816 |
| 5 |  |  |  |  |
| 6 | Atlantic Southern Properties (ASP) |  |  |  |
| 7 | Building Lease (use of building space) | ASP | 921 | 1,625,756 |
| 8 |  |  |  |  |
| 9 | Delmarva Power \& Light Company (DPL) |  |  |  |
| 10 | Materials | DPL | 154 | 3,422,344 |
| 11 | Mutual Assistance-Storm Services | DPL | Various | 775,798 |
| 12 | Extra-High Voltage (EHV) Transmission Agreement | DPL | 571 | 78,288 |
| 13 | Maintenance Services | DPL | 921 | 56,570 |
| 14 | Facility Services | DPL | 921 | 17,872 |
| 15 | Regulatory Services | DPL | 921 | 1,035 |
| 16 |  |  |  |  |
| 17 | Potomac Electric Company (Pepco) |  |  |  |
| 18 | Materials | Pepco | 154 | 67,558 |
| 19 | Shops Department Fabrication Services | Pepco | Various | 128,806 |
| 20 | Non-power Goods or Services Provided for Affiliate |  |  |  |
| 21 |  |  |  |  |
| 22 |  |  |  |  |
| 23 |  |  |  |  |
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| 40 |  |  |  |  |
| 41 |  |  |  |  |
| 42 |  |  |  |  |
| 1 | Non-power Goods or Services Provided by Affiliated |  |  |  |
| 2 | Millenium Account Servces LLC (Millenium) |  |  |  |
| 3 | Meter Reading Services | Millenium | 902 | 4,500,215 |
| 4 |  |  |  |  |


| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) X An Original <br> (2) _ A Resubmission | $\begin{gathered} \text { Date of Report } \\ \text { (Mo, Da, Yr) } \\ 04 / 02 / 2019 \end{gathered}$ | Year/Period of Report 2018/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |

## Schedule Page: 429 Line No.: 2 Column: a PHI Service Company (PHISCO) Overview

Services provided by PHISCO are provided under a Service Agreement with Atlantic City Electric Company (ACE). Charges are provided by either direct charging of costs or are based on an allocation. The Service Agreement provides specific guidelines on the allocation methods used to charge these costs to the various PHI affiliates. Information on the Service Company allocation methods are explained in detail under Schedule XXI, Methods of Allocations, in the FERC Form 60 filed for PHISCO.

PHISCO provides a variety of services which include customer services, support services, financial services, human resources, legal services, information technology, governmental affairs, communication services, regulatory services, regulated gas and electric (transmission and distribution services), executive management, and supply services.

The services provided by the regulated gas and electric area include: system operations services; meter maintenance and testing; power procurement and energy planning; and other delivery services, including delivery senior management, asset management, engineering standards, interconnection planning and arrangements, distribution and transmission planning, engineering services for distribution, substation and transmission, system protection, project and construction management, electric maintenance, administrative support, process improvement, and performance analysis.

## Schedule Page: 429 Line No.: 3 Column: c

PHISCO Centralized Support
Services to Pepco

| FERC <br> account | Amount |
| ---: | ---: |
| 107 | $19,208,475$ |
| 108 | $1,641,360$ |
| 163 | 784,564 |
| 182.3 | 124,457 |
| 184 | $1,276,234$ |
| 416 | 120,871 |
| 417.1 | 443 |
| 419 | $(43,171)$ |
| 426.1 | 38,645 |
| 426.3 | 57,049 |
| 426.4 | 418,421 |
| 426.5 | $(15,703)$ |
| 430 | 220,196 |
| 431 | 935,836 |
| 556 | 823,961 |
| 557 | 737,865 |
| 560 | 59 |
| 561.1 | 119 |
| 561.2 | 59 |
| 561.3 | 52,212 |
| 561.5 | $1,670,655$ |
| 566 | 29,063 |
| 568 | 217 |
| 569 | 2,240 |
| 570 | 441,091 |
| 571 | 136 |
| 573 | 555,815 |

FERC FORM NO. 1 (ED. 12-87)

Exhibit B-5 Page 10 of 20

| Name of Respondent |  |
| ---: | ---: |
| Atlantic City Electric Company |  |
|  |  |
| 581 | 104,480 |
| 586 | 287,880 |
| 587 | 134,602 |
| 588 | $1,550,925$ |
| 590 | 44,777 |
| 592 | 277,300 |
| 593 | 709,868 |
| 598 | 27,506 |
| 902 | 312,836 |
| 903 | $39,647,851$ |
| 907 | 148,251 |
| 908 | 521,247 |
| 909 | 323,833 |
| 923 | $44,869,955$ |
| 924 | 10,227 |
| 925 | 826,663 |
| 928 | 22,346 |
| 930.1 | 428,136 |
| 930.2 | 17 |
| 935 | $119,339,831$ |

Schedule Page: 429 Line No.: 5 Column: a
Exelon Business Services Company, LLC (EBSC) Overview
Services provided by EBSC are provided under a General Service Agreement with ACE.
Charges are provided by either direct charging of costs or are
based on an allocation.
The factors for allocating the costs from EBSC to Exelon affiliates are contained in the
General Services Agreement. Information on the EBSC allocation methods are explained in
detail under Schedule XXI, Methods of Allocations, in the FERC
Form 60 filed for EBSC.
EBSC provides a variety of support services, including:
financial, human resources
IT, communication, legal, governmental and regulatory affairs, executive, security,
supply, Exelon Utilities, BSC Operations, real estate, and
other.
Schedule Page: 429 Line No.: 6 Column: c
EBSC Centralized
Support Services to
Pepco

| FERC <br> Account | Amount |
| :---: | ---: |
| 107 | $18,976,094$ |
| 108 | 42,724 |
| 163 | 717,942 |
| 426.1 | 260,828 |
| 426.3 | 41 |
| 426.4 | 80,493 |
| 560 | $1,462,742$ |
| 566 | $1,881,949$ |

FERC FORM NO. 1 (ED. 12-87)

| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) $X$ An Original <br> (2) A Resubmission | Date of Report (Mo, Da, Yr) 04/02/2019 | Year/Period of Report 2018/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |


| 588 | 24,967 |
| :---: | ---: |
| 593 | 50,315 |
| 903 | $6,948,732$ |
| 923 | $32,354,300$ |
| 924 | 411,770 |
| 925 | 302 |
| 930.1 | 163,397 |
| 930.2 | 29,708 |
| Total | $63,406,304$ |

## Schedule Page: 429 Line No.: 9 Column: c

BGE Information
Technology Services
provided to ACE:

| FERC | Amount |  |
| :---: | :---: | :---: |
| 107 | \$ | 6,781 |
| 921 |  | 23,017 |
| Total | \$ | 29,798 |

## Schedule Page: 429 Line No.: 18 Column: c

ComEd Information
Technology Services
provided to Pepco:

| FERC | Amount |  |
| :---: | :---: | :---: |
| 107 | \$ | 83,447 |
| 921 |  | 61,510 |
| Total | \$ | 44,957 |

## Schedule Page: 429.1 Line No.: 4 Column: c

CPSG Mechanical and
Electrical Industrial
Services provided to
Pepco:

| FERC |  | Amount |  |
| :---: | ---: | ---: | :---: |
| 107 |  |  |  |
| 108 |  |  |  |
| Total |  | 483,720 |  |
|  |  | 501,896 |  |

## Schedule Page: 429.1 Line No.: 11 Column: c

DPL Mutual Assistance
Services to ACE:

| FERC | Amount |  |
| :---: | :---: | :---: |
| 107 | \$ | 227,921 |
| 108 |  | 25,325 |
| 182.3 |  | 522,552 |
| Total | \$ | 775,798 |

Schedule Page: 429.1 Line No.: 19 Column: c
Pepco Shops Department
Fabrication Services to
ACE:

| FERC | Amount |
| ---: | :--- |
| 107 | $\$ 121,364$ |

FERC FORM NO. 1 (ED. 12-87)

| Name of Respondent <br> Atlantic City Electric Company |
| :--- |
|  |
| 108 10,442 <br> Total $\$ 128,806$ |

2. The reporting threshold for reporting purposes is $\$ 250,000$. The threshold applies to the annual amount billed to the respondent or billed to an associated/affiliated company for non-power goods and services. The good or service must be specific in nature. Respondents should not attempt to include or aggregate amounts in a nonspecific category such as "general".
3. Where amounts billed to or received from the associated (affiliated) company are based on an allocation process, explain in a footnote.

Line
No. ,

Non-power Goods or Services Provided by Affiliated

PHI Service Company (PHISCO)
Centralized Support Services

Exelon Business Services Company (EBSC)
Centralized Support Services

Delmarva Light \& Power Company (DPL)
Analyst Services
Construction, Operations and Maintenance Services
Regulatory Affairs Services
Field Training Services
Engineering and Planning Services
Meter Services
Name of
Associated/Affiliated

Company
(b)
Account
Charged or
Credited
(c)
Amount Charged or Credited
(d)

TRANSACTIONS WITH ASSOCIATED (AFFILIATED) COMPANIES

1. Report below the information called for concerning all non-power goods or services received from or provided to associated (affiliated) companies.
2. The reporting threshold for reporting purposes is $\$ 250,000$. The threshold applies to the annual amount billed to the respondent or billed to an associated/affiliated company for non-power goods and services. The good or service must be specific in nature. Respondents should not attempt to include or aggregate amounts in a nonspecific category such as "general".
3. Where amounts billed to or received from the associated (affiliated) company are based on an allocation process, explain in a footnote.

| Line No. | Description of the Non-Power Good or Service <br> (a) | Name of Associated/Affiliated Company <br> (b) | Account Charged or Credited (c) | Amount Charged or Credited (d) |
| :---: | :---: | :---: | :---: | :---: |
| 3 | Drafting Services | DPL | Various | 8,115 |
| 4 | Communication Services | DPL | 107 | 756 |
| 5 | Storm Restoration Services | DPL | Various | 127,178 |
| 6 | Lease of Office Space Facilities | DPL | 929 | 28,207 |
| 7 | Energy Supply Administrative Services | DPL | 557 | 7,176 |
| 8 | Materials and Stores | DPL | Various | 777,817 |
| 9 |  |  |  |  |
| 10 |  |  |  |  |
| 11 | Potomac Electric Power Company (Pepco) |  |  |  |
| 12 | Construction, Operations and Maintenance Services | Pepco | Various | 7,805 |
| 13 | Engineering and Planning Services | Pepco | 107 | 51,964 |
| 14 | Analyst Services | Pepco | 923 | 686 |
| 15 | Shops Department Fabrication Services | Pepco | 107 | 70,312 |
| 16 | Customer Services | Pepco | 903 | 13,628 |
| 17 | Safety Services | Pepco | 107 | 880 |
| 18 | Storm Restoration Services | Pepco | 593 | 11,034 |
| 19 | Materials and Stores | Pepco | Various | 293,605 |
| 20 | Non-power Goods or Services Provided for Affiliate |  |  |  |
| 21 | Exelon Generation Company LLC |  |  |  |
| 22 | Engineering and Planning Services | Exelon Generation | 580 | 22,559 |
| 23 |  |  |  |  |
| 24 | Potomac Electric Power Company (Pepco) |  |  |  |
| 25 | Communication Services | Pepco | 592 | 630 |
| 26 | Construction, Operations and Maintenance Services | Pepco | Various | 21,032 |
| 27 | Engineering and Planning Services | Pepco | 588 | 946 |
| 28 | Facility Services | Pepco | 929 | 2,597 |
| 29 | Field Training Services | Pepco | 588 | 1,776 |
| 30 | Customer Services | Pepco | 908 | 768 |
| 31 | Asset Transfers | Pepco | 101 | 2,741 |
| 32 | Materials and Stores | Pepco | Various | 167,201 |
| 33 |  |  |  |  |
| 34 |  |  |  |  |
| 35 |  |  |  |  |
| 36 |  |  |  |  |
| 37 |  |  |  |  |
| 38 |  |  |  |  |
| 39 |  |  |  |  |
| 40 |  |  |  |  |
| 41 |  |  |  |  |
| 42 |  |  |  |  |
| 1 | Non-power Goods or Services Provided by Affiliated |  |  |  |
| 2 | Atlantic Southern Properties (ASP) |  |  |  |
| 3 | Building Services (Lease of May's Landing) | ASP | 929 | 2,280,041 |
| 4 |  |  |  |  |

Name of Respondent
Atlantic City Electric Company
This Report Is:
(1) $X$ An Original Mo, Da, Yr)
(2) $\square$ A Resubmission
/ /
TRANSACTIONS WITH ASSOCIATED (AFFILIATED) COMPANIES

1. Report below the information called for concerning all non-power goods or services received from or provided to associated (affiliated) companies.
2. The reporting threshold for reporting purposes is $\$ 250,000$. The threshold applies to the annual amount billed to the respondent or billed to an associated/affiliated company for non-power goods and services. The good or service must be specific in nature. Respondents should not attempt to include or aggregate amounts in a nonspecific category such as "general".
3. Where amounts billed to or received from the associated (affiliated) company are based on an allocation process, explain in a footnote.

| Line No. | Description of the Non-Power Good or Service <br> (a) | Name of Associated/Affiliated Company <br> (b) | Account Charged or Credited (c) | Amount Charged or Credited (d) |
| :---: | :---: | :---: | :---: | :---: |
| 5 |  |  |  |  |
| 6 | Millenium Account Services LLC (Millenium) |  |  |  |
| 7 | Meter Reading Services | Millenium | 902 | 4,547,018 |
| 8 |  |  |  |  |
| 9 |  |  |  |  |
| 10 | PECO Energy Company (PECO) |  |  |  |
| 11 | Construction, Operations and Maintenance Services | PECO | 593 | 290,859 |
| 12 | Sustation Engineering Services | PECO | 560 | 156,452 |
| 13 | Governmental Affairs Services | PECO | 920 | 8,312 |
| 14 | Mutual Assistance Services | PECO | Various | 80,091 |
| 15 | Extra-high voltage (EHV) Transmission Line Agreem | PECO | 571 | 107,736 |
| 16 |  |  |  |  |
| 17 |  |  |  |  |
| 18 |  |  |  |  |
| 19 |  |  |  |  |
| 20 | Non-power Goods or Services Provided for Affiliate |  |  |  |
| 21 | Atlantic Southern Properties (ASP) |  |  |  |
| 22 | Facilitiy Services | ASP | Various | 560,680 |
| 23 |  |  |  |  |
| 24 | Pepco Energy Services Inc. (PES) |  |  |  |
| 25 | Lease of Facility | PES | 929 | 14,832 |
| 26 |  |  |  |  |
| 27 |  |  |  |  |
| 28 |  |  |  |  |
| 29 |  |  |  |  |
| 30 |  |  |  |  |
| 31 |  |  |  |  |
| 32 |  |  |  |  |
| 33 |  |  |  |  |
| 34 |  |  |  |  |
| 35 |  |  |  |  |
| 36 |  |  |  |  |
| 37 |  |  |  |  |
| 38 |  |  |  |  |
| 39 |  |  |  |  |
| 40 |  |  |  |  |
| 41 |  |  |  |  |
| 42 |  |  |  |  |
|  |  |  |  |  |


| Name of Respondent | This Report is: <br> $(1)$ X An Original <br> $(2)$ A Resubmission | Date of Report <br> (Mo, Da, Yr) <br> $1 / /$ | Year/Period of Report |
| :--- | :--- | :---: | :---: |
| Atlantic City Electric Company |  | $2017 /$ Q4 |  |

## Schedule Page: 429 Line No.: 4 Column: a

Services provided by PHISCO are provided under a Service Agreement with Atlantic City Electric Company (ACE).
Charges are provided by either direct charging of costs or are based on an allocation. The Service Agreement provides specific guidelines on the allocation methods used to charge these costs to the various PHI affiliates. Information on the Service Company allocation methods are explained in detail under Schedule XXI, Methods of Allocations, in the FERC Form 60 filed for PHISCO.

PHISCO provides a variety of services which include customer services, information technology, external affairs, environmental and safety services and regulated gas and electric (transmission and distribution services), executive management, procurement and administrative services, financial and corporate services, insurance services, human resources, and legal services.

The services provided by the regulated gas and electric area include system operations services; meter maintenance and testing; power procurement and energy planning; and other delivery services, including delivery senior management, asset management, financial analysis, engineering standards, interconnection planning and arrangements, distribution and transmission planning, value added services, engineering services for distribution, substation and transmission, system protection, drafting and construction management, electric maintenance, administrative support, forestry, process improvement, training, performance analysis, benchmarking, and enabling systems.

## Schedule Page: 429 Line No.: 4 Column: $C$

PHISCO Centralized Support Services to ACE

FERC Accounts

| ounts | Amount |  |
| :---: | :---: | :---: |
| 107 | \$ | 20,238,001 |
| 182.3 |  | 217,458 |
| 184 |  | 240,842 |
| 408.1 |  | 705 |
| 416 |  | 682,876 |
| 417.1 |  | 10,865 |
| 419 |  | $(25,715)$ |
| 426.1 |  | 80,595 |
| 426.2 |  | $(225,935)$ |
| 426.3 |  | 1,159 |
| 426.4 |  | 31,198 |
| 426.5 |  | 725,261 |
| 430 |  | 27,028 |
| 431 |  | $(12,879)$ |
| 556 |  | 1,397,736 |
| 557 |  | 1,123,936 |
| 560 |  | 3,135,496 |
| 561.1 |  | 9,981 |
| 561.2 |  | 19,453 |
| 561.3 |  | 44,911 |
| 561.5 |  | 219,013 |
| 566 |  | 829,555 |
| 568 |  | 100,446 |
| 569 |  | 6,993 |
| 569.2 |  | 311,341 |
| 570 |  | 64,923 |
| 571 |  | 286,999 |
| 572 |  | 172 |
| 573 |  | 28,110 |
| 580 |  | 900,876 |
| 581 |  | 408,220 |
| 583 |  | 179,386 |
| 586 |  | 447,257 |
| 587 |  | 349,544 |
| 588 |  | 4,244,289 |
| 589 |  | 409 |
| 590 |  | 573,387 |
| 591 |  | 6,792 |
| 592 |  | 427,768 |


| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) $X$ An Original <br> (2) _ A Resubmission | Date of Report (Mo, Da, Yr) | Year/Period of Report <br> 2017/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |


| 593 | $1,231,469$ |
| ---: | ---: |
| 594 | 69,299 |
| 596 | 36,511 |
| 597 | 34,459 |
| 598 | 20,222 |
| 902 | 36,799 |
| 903 | $47,660,833$ |
| 907 | 156,520 |
| 908 | 652,072 |
| 909 | 539,891 |
| 920 | 100,744 |
| 921 | 712 |
| 923 | $42,144,669$ |
| 924 | 91 |
| 926 |  |
| 928 | 4923,683 |
| 929 |  |
| 930.1 |  |
| 930.2 |  |
| 935 |  |

## Schedule Page: 429 Line No.: 7 Column: a

## Exelon Business Services Company, LLC (EBSC) Overview

Services provided by EBSC are provided under a General Service Agreement with ACE. Charges are provided by either direct charging of costs or are based on an allocation. The factors for allocating the costs from EBSC to Exelon affiliates are contained in the General Services Agreement. Information on the EBSC allocation methods are explained in detail under Schedule XXI, Methods of Allocations, in the FERC Form 60 filed for EBSC.

EBSC provides a variety of support services, including financial, human resources IT-Non-Telecommunications, communication, legal governance, executive, security, supply, BSC Exelon Utility, operations, real estate, and other.

## Schedule Page: 429 Line No.: 7 Column: $\mathbf{c}$

EBSC Centralized Support Services to ACE

| FERC Accounts | Amount |  |
| :---: | :---: | :---: |
| 107 | \$ | 9,727,814 |
| 426.1 |  | 829,254 |
| 426.4 |  | 93,092 |
| 426.5 |  | 537 |
| 560 |  | 389,994 |
| 909 |  | 8,192 |
| 920 |  | 262 |
| 923 |  | 22,776,150 |
| 924 |  | 386,837 |
| 930.1 |  | 104,995 |
| Total | \$ | 34,317,127 |

## Schedule Page: 429 Line No.: 11 Column: c

DPL Construction, Operations and Maintenance Services to ACE

| FERC Account |  | Amount |  |
| ---: | ---: | ---: | ---: |
| 557 | $\$$ | 1,620 |  |
| 566 |  | 506 |  |
| 586 |  | 1,936 |  |
| 107 |  | 1,581 |  |
| Total | $\$$ | $\mathbf{5 , 6 4 3}$ |  |

Schedule Page: 429 Line No.: 14 Column: c

| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) $X$ An Original <br> (2) A Resubmission | Date of Report (Mo, Da, Yr) / / | Year/Period of Report 2017/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |

DPL Engineering and Planning Services to ACE

| FERC Account | Amount |  |
| ---: | :--- | ---: |
|  | $\$ 07$ | $\$$ |
| 560 |  | 85,666 |
| 568 |  | 680 |
| Total | 590 | $\$$ |

Schedule Page: 429 Line No.: 15 Column: c
DPL Meter Services to ACE

| FERC Account |  | Amount |
| ---: | ---: | ---: |
| 586 | $\$$ | 1,470 |
| 593 |  | 115,647 |
| Total | $\$$ | $\mathbf{1 1 7 , 1 1 7}$ |

Schedule Page: 429 Line No.: 16 Column: c
DPL Vehicle Services to ACE

| FERC Accounts |  | Amount |  |
| ---: | ---: | ---: | ---: |
| 580 | $\$$ | 3,825 |  |
| 592 |  | 16,725 |  |
| 593 |  | 3,712 |  |
|  | 929 |  | 42,827 |
| Total |  | $\$$ | $\mathbf{6 7 , 0 8 9}$ |

Schedule Page: 429 Line No.: 29 Column: c
ACE Materials and Supplies to DPL


Schedule Page: 429 Line No.: 35 Column: c
ACE Materials and Stores to PHISCO

| FERC Account |  | Amount |  |
| ---: | ---: | ---: | :---: |
| 154 | $\$$ | 5,328 |  |
| 929 |  | 751 |  |
| Total | $\mathbf{\$}$ | $\mathbf{6 , 0 7 9}$ |  |

Schedule Page: 429.1 Line No.: 3 Column: c
DPL Drafting Services to ACE

| FERC Account | Amount |  |
| :---: | :---: | :---: |
| 107 | \$ | 5,399 |
| 560 |  | 2,703 |
| 920 |  | 13 |
| Total | \$ | 8,115 |

## Schedule Page: 429.1 Line No.: 5 Column: c

DPL Storm Restoration Services to ACE

FERC Account
Amount
FERC FORM NO. 1 (ED. 12-87)
Page 450.3

Exhibit B-5 Page 19 of 20

| Name of Respondent <br> Atlantic City Electric Company | This Report is: <br> (1) $\underline{X}$ An Original <br> (2) A Resubmission | Date of Report (Mo, Da, Yr) / / | Year/Period of Report 2017/Q4 |
| :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |


|  | 107 | $\$$ | 88,490 <br> 38,688 <br>  <br> Total <br>  <br> 593 |
| :--- | :--- | ---: | ---: |
|  |  | $\$$ | $\mathbf{1 2 7 , 1 7 8}$ |

Schedule Page: $429.1 \quad$ Line No.: 8 Column: c
DPL Materials and Supplies to ACE

| FERC Account |  | Amount |
| ---: | ---: | ---: |
| 107 | $\$$ | 110,616 |
| 154 |  | 640,291 |
| 580 |  | 569 |
| 581 |  | 38 |
| 592 |  | 11,770 |
| 929 |  | 14,533 |
| Total | $\$$ | $\mathbf{7 7 7 , 8 1 7}$ |
|  |  |  |

## Schedule Page: 429.1 Line No.: 12 Column: c

Pepco Construction, Operations and Maintenance Services to ACE

| FERC |  |  |  |
| :---: | :---: | :---: | :---: |
|  | 570 | \$ | 1,007 |
|  | 573 |  | 90 |
|  | 592 |  | 432 |
|  | 593 |  | 5,904 |
|  | 594 |  | 372 |
| Total |  | \$ | 7,805 |

## Schedule Page: 429.1 Line No.: 19 Column: c

Pepco Materials and Stores to ACE

| FERC Account ${ }_{107}$ |  | Amount |  |
| :---: | :---: | :---: | :---: |
|  |  | \$ | 64,961 |
|  | 154 |  | 222,711 |
|  | 929 |  | 5,933 |
| Total |  | \$ | 293,605 |

## Schedule Page: 429.1 Line No.: 26 Column: c

Pepco Construction, Operations and Maintenance Services to ACE

| FERC Account |  | Amount <br> 592 <br> 593 |
| ---: | ---: | ---: |
| Total | $\$$4,536 <br>  | $\$$ |

## Schedule Page: 429.1 Line No.: 32 Column: c

| ACE Materials and Stores to Pepco |  |  |  |
| :---: | :---: | :---: | :---: |
| FERC Account |  | Amount |  |
|  | 154 | \$ | 158,359 |
|  | 929 |  | 8,842 |
| Total |  | \$ | 167,201 |


| Name of Respondent | This Report is: <br> $(1)$ X An Original <br> $(2) ~ A ~ R e s u b m i s s i o n ~$ | Date of Report <br> (Mo, Da, Yr) <br> Atlantic City Electric Company | Year/Period of Report |  |  |  |
| :--- | :--- | :---: | :---: | :---: | :---: | :---: |
| FOOTNOTE DATA |  |  |  |  |  | $2017 / Q 4$ |

## Schedule Page: 429.2 Line No.: 14 Column: c

| PECO Mutual Assistance Services to ACEFERC Account Amount |  |  |  |
| :---: | :---: | :---: | :---: |
|  | 107 | \$ | 49,905 |
|  | 593 |  | 30,186 |
| Total |  | \$ | 80,091 |

Schedule Page: 429.2 Line No.: 22 Column: c

| FERC Account | Amount |  |  |
| :---: | :---: | :---: | :---: |
|  | 593 | \$ | 392 |
|  | 920 |  | 145 |
|  | 929 |  | 560,143 |
| Total |  | \$ | 560,680 |

## Exhibit B-6

## Consolidated Tax Adjustment Model (ACE 2019)

Any information claimed to be confidential contained in Exhibit B-6 will be provided upon execution of an Agreement of NonDisclosure of Information ("NDA") by the parties to this proceeding. The NDA will follow once a docket number has been assigned.

# Exhibit B-7 

## Journal Entries

## Atlantic City Electric Company

Residential and Commercial Energy Efficiency and Demand Response Surcharge Accounting Entries

1 Direct Program Costs Incurred (Incremental Investments and O\&M Expenses)

| Incremental Investments |  |  |  |
| :---: | :---: | :---: | :---: |
| Debit | 182.3 | Other Regulatory Assets | x.xx |
| Credit | 131/232 | Cash/Accounts Payable |  |
| Incremental O\&M Expenses |  |  |  |
| Debit | 908 | Customer Assistance Expenses (Major only) | x.xx |
| Credit | 131/232 | Cash/Accounts Payable |  |

2 Shared Program Costs Reimbursed from Partner Utility (Incremental Investments only) Incremental Investments Reimbursed from Partner Utility
$\begin{array}{lll}\text { Credit } & 182.3 & \text { Other Regulatory Assets }\end{array}$
x.xx

Incremental Investments Repaid to Partner Utility
Debit $\quad 182.3$ Other Regulatory Assets
Credit 131/232 Cash/Accounts Payable
x.xx

3 Direct Loan Costs Incurred Third-Party Interest Buy Down
$\begin{array}{lll}\text { Debit } & 182.3 & \text { Other Regulatory Assets }\end{array}$
Credit 131/232 Cash/Accounts Payable
$x . x x \quad$ x.xx

4 Revenue Cost Recovery (record monthly revenues)
Revenue
$\begin{array}{ll}\text { Debit } & 142 \\ \text { Customer Accounts Receivable }\end{array}$
Credit
400 Operating Revenues
x.xx
x.xx

5 Amortization of Incremental Investment Costs
Amortization (10-year Amortization Period)
Debit 407.3 Regulatory Debits
Credit 182.3 Other Regulatory Assets
x.xx

Deferral of Over/Under Recovery

## Deferral of Over Recovery

Debit 407.3 Regulatory Debits
Credit 254 Other Regulatory Liabilities
x.xx $\quad$.xx

| Deferral of Under Recovery |  |  |
| :--- | ---: | :--- |
| Debit | 182.3 | Other Regulatory Assets |
| Credit | 407.4 | Regulatory Credits |

x.xx

7 Accrue Interest on Over/Under Recover
Interest Expense on Over Recovery
Debit 431 Interest Expense
Credit 254 Other Regulatory Liabilities

Credit 419 Other Income
x.xx

## Exhibit C

## Draft Public Notice

# NOTICE TO CUSTOMERS OF ATLANTIC CITY ELECTRIC COMPANY OF THE FILING OF ENERGY EFFICIENCY PROGRAM PROPOSAL AND RELATED COST RECOVERY MECHANISM NOTICE OF PUBLIC HEARINGS AND OPPORTUNITY FOR PUBLIC COMMENTS 

In the Matter of the Petition of Atlantic City Electric Company for Approval of an Energy Efficiency Program, Cost Recovery Mechanism, and Other Related Relief for Plan Years One Through Three

BPU Docket No.

PLEASE TAKE NOTICE that, on or about September 25, 2020, Atlantic City Electric Company ("ACE" or "Company"), a New Jersey public utility, filed a petition ("Petition") with the New Jersey Board of Public Utilities ("Board" or "BPU"), BPU Docket No. $\qquad$ , seeking the Board's approval of an Energy Efficiency Program Plan ("EE Program" or "Program") to be implemented throughout the Company's service territory over a three-year period beginning in July 2021. The EE Program is an extensive array of individual energy efficiency ("EE") products and services designed to enable all ACE customers to reduce their use of electricity. The costs of the EE Program include investment costs of approximately $\$ 89$ million and incremental operations and maintenance ("O\&M") costs of $\$ 10$ million, for a total incremental EE Program cost of approximately $\$ 99$ million over three years. The costs include recovery of approximately $\$ 577,000$ in program planning costs that were incurred in the planning and development of the Program. The Company estimates that implementation of the EE Program will yield benefits that exceed the costs of the Program. ACE has performed a benefits/cost analysis and estimated customers will save $\$ 552$ million on their electric and gas bills over the life of the measures implemented as part of the EE Program.

In its Petition, ACE seeks Board approval of its EE Program plan and authority to recover the revenue requirement associated with its $\$ 99$ million incremental investment through a Rider EE. As described in ACE's Petition, Rider EE will be imposed gradually as the EE Program is implemented and customers begin to avail themselves of EE products and services. The Company proposes that Rider EE be implemented beginning in July 2022, and then updated annually to reflect new investments placed into service. The Company estimates the first-year impact of Rider EE on the monthly bill for a typical residential customer (using approximately $679 \mathrm{kWh} / \mathrm{month}$ ) will be an increase of $\$ 0.30$ or approximately $0.23 \%$ above present rates. The exact amount that a customer's bill will increase will depend upon the amount of electricity the customer uses. A chart is included with this notice to help residential customers assess the impact of the EE Program and Rider EE on their monthly bills.

The Company filed the following rate schedules with its Petition. Any final rate adjustments found by the Board to be just and reasonable may be modified and/or allocated by the Board in accordance with the provisions of N.J.S.A. 48:3-4, and for other good and legally sufficient reasons, to any class or classes of customers of the Company. Therefore, the rates set out below may increase or decrease based upon the Board's decision.

## [insert tables]

Residential customers can compare their monthly usage with the chart below to see how the imposition of the proposed Rider EE will affect their bills:

## [insert residential chart]

The above assumes that customers receive their electric supply from the Company.
The chart below provides information as to the percentage rate change by customer class for the entire Rider EE:

## [insert percentage chart]

The Company's EE Program filing also seeks the approval of a Conservation Incentive Plan ("CIP") and the methodology to calculate a Rider CIP to allow ACE an opportunity to recover a portion of the revenues that will be lost as EE measures are implemented across its service territory, electricity sales decline, and the Company's revenues decline. ACE proposes that Rider CIP be applied to rate schedules RS, MGS Secondary, MGS Primary, AGS Secondary, AGS Primary and TGS. The Company is not seeking to impose Rider CIP at this time, but rather to obtain approval of the methodology to be applied in a future cost recovery filing. Therefore, no estimated rate impacts have been identified at this time.

A copy of this Notice of Filing and Public Hearings on the Petition is being served upon all municipal and county clerks or equivalent within the Company's service territory, as required by law. The Petition and this Notice have also been sent to the New Jersey Division of Rate Counsel ("Rate Counsel"), who will represent the interests of all ACE customers in this proceeding. Copies of ACE's Petition and this Public Notice are posted on ACE's website at www.atlanticcityelectric.com/PublicPostings.

PLEASE TAKE FURTHER NOTICE that, due to the COVID-19 pandemic, a telephonic hearing on the Petition will be conducted at the day and times listed below by a hearing officer designated by the Board:

| DATE: | DATE: |
| :--- | :--- |
| TIME: 4:30 P.M. | TIME: 5:30 P.M. |
| DIAL-IN NUMBER: (866) 326-9183 | DIAL-IN NUMBER: (866) 326-9183 |
| PASSCODE: 617161\# | PASSCODE: 617161\# |

Representatives from the Company, Board Staff and Rate Counsel will participate via telephone in the public hearing. Members of the public are invited to listen and participate by phone via the above designated Dial-In Number and Passcode and may express their views on this filing. Such comments will be made a part of the final record of the proceeding to be considered by the Board. In order to encourage full participation in this opportunity for public comments, please submit any
requests for needed accommodations, such as interpreters or listening devices, 48 hours prior to the above hearings to the Board’s Secretary at board.secretary@bpu.nj.gov.

The Board is also accepting written and/or emailed comments. Although both will be given equal consideration, the preferred method of transmittal is via email to ensure timely receipt while the Board continues to work remotely due to the COVID-19 pandemic. Written comments may be submitted to the Board Secretary, Aida Camacho-Welch, at the Board of Public Utilities, 44 South Clinton Avenue, 9th Floor, P.O. Box 350, Trenton, NJ 08625-0350. Email comments should be submitted to board.secretary@bpu.nj.gov. Please include the name of the Petition and BPU Docket No. $\qquad$ when submitting comments.

Dated:

Direct Testimony of Marisa Slaten and William Ellis

# ATLANTIC CITY ELECTRIC COMPANY <br> BEFORE THE NEW JERSEY BOARD OF PUBLIC UTILITIES DIRECT TESTIMONY OF MARISA SLATEN AND WILLIAM ELLIS <br> BPU DOCKET NO. <br> $\qquad$ 

## Q1. Please state your name and position.

A1. My name is Marisa Slaten. I am the Director of Regulatory Strategy \& Services for Pepco Holdings LLC ("PHI"), an indirect subsidiary of Exelon Corporation ("Exelon").

My name is William Ellis. I am the Director of Governmental and External Affairs for Potomac Electric Power Company ("Pepco"), an indirect subsidiary of Exelon and the former Senior Portfolio Manager, Energy Efficiency for PHI.

Q2. On whose behalf are you submitting your Direct Testimony in this case?
A2. We are submitting Testimony on behalf of Atlantic City Electric Company ("ACE" or the "Company"), the Petitioner in this case.

Q3. Ms. Slaten, what are your responsibilities as Director, Regulatory Strategy \& Services?

A3.
I am responsible for managing regional regulatory activities and stakeholder engagement for PHI and two of its regulated utility subsidiaries, ACE and Delmarva Power \& Light Company ("Delmarva"). In this capacity, I am responsible for regulatory affairs related to PHI's utility business before the New Jersey Board of Public Utilities (the "BPU" or "Board") and the Delaware Public Service Commission. I also participate in PHI's analysis of regulatory issues and the development of positions on those issues.

Q4. Ms. Slaten, please describe your educational and professional background and experience.

A4. I earned a Bachelor of Arts degree in Economics from Northwestern University and a Juris Doctor from Rutgers University School of Law. I joined PHI in 2017. Prior to joining PHI, I worked for the BPU as the Director of the Division of Clean Energy (formerly, the Division of Economic Development \& Emerging Issues) and as the Assistant Director from June 2014 to November 2017. Prior to that, I worked for the State of New Jersey Office of the Attorney General as a Deputy Attorney General from 2007 to 2014. Prior to that, I was an Associate at Riker, Danzig, Scherer, Hyland \& Perretti, LLP. I also clerked for the Supreme Court of New Jersey.

Q5. Mr. Ellis, please describe your responsibilities as the former Sr. Manager of Energy Efficiency and your current role as Director of Governmental and External Affairs.

A5. I was the Sr. Portfolio Manager, Energy Efficiency during the preparation of this filing. During that time I was responsible for developing and implementing the strategic vision for increasing Demand Side Management programs across ACE, Delmarva and Pepco. I transitioned to my current role in Government and External Affairs in August 2020 and I am now responsible for developing and leading integrated legislative, policy, and stakeholder outreach activities in Montgomery and Prince George's Counties in Maryland and will also support broader engagement efforts across the state.

Q6. Mr. Ellis, please describe your educational and professional background and experience

Q6. I earned my Bachelor's degree in Electrical Engineering, and Masters' degrees in Engineering Management and Electrical Engineering from The Catholic University of

America. I also have a Global Executive MBA from Georgetown University and am a certified Project Management Professional.

Prior to becoming Director of Governmental and External Affairs in August 2020, I was the Sr. Portfolio Manager, Energy Efficiency. Prior to that, I was a Performance Assessment Manager with Exelon Utilities, developing and driving strategic priorities for core functions across all of Exelon. Prior to that, I held engineering roles in Capacity Planning, Substation and Telecom \& Relay Protection departments.

## Q7. What is the purpose of your Direct Testimony?

A7. ACE provides electric distribution service to approximately 560,000 customers in the eight southernmost counties in New Jersey - Atlantic, Burlington, Camden, Cape May, Cumberland, Gloucester, Ocean, and Salem. The purpose of our testimony, as well as the other testimonies included in this filing, is to support ACE's proposal to establish and implement Energy Efficiency ("EE") Programs in its service territory. Our Direct Testimony will (a) provide an overview of the ACE 2021-2023 Energy Efficiency Program Plan ("EE Program" or "EE Program Plan"); (b) provide a summary of the ACE EE Program cost recovery filing; (c) describe ACE's plans for workforce development and job training programs; and (d) summarize the Direct Testimony of the Company's witnesses. ${ }^{1}$

This testimony was prepared by us or under our direct supervision and control. The source documents for our testimony are Company records and public documents. We also rely upon our personal knowledge and experience.

[^15]
## PROGRAM OVERVIEW

## Q8. Please provide a brief background of ACE's EE Program Filing.

A8. In proposing the ACE EE Program, the Company has attempted to balance the goals of the State along with the needs of customers, many of whom are facing economic challenges due to impacts of the COVID pandemic. For this reason, ACE reviewed the energy efficiency programs it currently offers and is providing a tailored portfolio of six core and utility-led programs that focuses on the cost effectiveness of the offerings programs that will achieve meaningful savings for customers. These programs reflect the BPU-mandated "core programs" across the residential, commercial and industrial, and multi-family sectors, as well as additional utility-led programs. Among others, these offerings include weatherization and low-to-moderate income programs, in order to ensure equitable access across ACE's service territory.

The Demand Side Management department within the PHI Customer Operations business unit contracted with Gabel Associates on behalf of ACE to design a portfolio of EE programs that would be informed by the New Jersey 2019 Energy Master Plan ${ }^{2}$ ("EMP") and comply with the Clean Energy Act of 2018 (P.L. 2018, c. 17 (N.J.S.A. 48:387.8 et al.)) (the "Act") and the June 10, 2020 order in BPU Docket Nos. QO19010040, QO19060748, and QO17091004 ("June 10 Order"). Those programs are described in the "EE Program Plan" attached as Schedule (BJB)-2 to Company Witness Baatz’s Direct Testimony.

[^16]Q9. Is this filing made in compliance with the June 10 Order in BPU Docket Nos. QO19010040, QO19060748, QO17091004 or any other authority?

A9. Yes. This filing is made in compliance with N.J.S.A. 48:3-98.1, the Act, and the June 10 Order, including the Minimum Filing Requirements. It is also consistent with the EMP, the New Jersey Global Warming Response Act ${ }^{3}$, and the Act Concerning the Reduction of Greenhouse Gas Emissions. ${ }^{4}$ Pursuant to the June 10 Order, ACE's EE Program Plan includes the mandated "core programs" across the residential, commercial and industrial, and multi-family sectors. The design of these programs was developed in collaboration with BPU Staff and the other New Jersey gas and electric utilities; the programs were also informed by a public stakeholder process, which occurred over the course of nine stakeholder meetings between September 2019 and July 2020. These programs, when added to the existing EE programs that ACE manages, will enable the Company to achieve the Board-ordered energy reduction target of $0.74 \%$ in PY2 and $0.97 \%$ in PY3. ${ }^{5}$

## Q9. Please provide a summary of the Company's request in this filing.

A9. The Company is requesting that the Board approve the proposed new ACE EE Program offerings which will better benefit its residential customers as well as bring new program offerings and savings opportunities to its commercial and industrial customers. The ACE EE Program is incremental to the two existing residential programs that ACE

[^17]administers (Quick Home Energy Check-up and the Behavior Program offered by Opower $^{6}$ ), as described in detail in Q 12 - Q15 of this testimony.

The ACE EE Program portfolio includes a combination of core programs and utility-led programs. The core program offerings are consistently aligned across the State and build off of those programs currently implemented and managed by the BPU Division of Clean Energy, with some modifications. The utility-led programs are specific to ACE's customers and will offer additional opportunities to customers to save energy. The ACE EE Program plan is designed to establish the foundation for the Company to meet its Boardmandated energy savings goal of $1.44 \%$ of retail sales by Program Year 5.

The following table summarizes the proposed ACE EE Program initiatives and costs, which total $\$ 98.6$ million. This amount reflects $\$ 95.8$ million in program costs and $\$ 2.8$ million in portfolio costs. The Company will also seek recovery of $\$ 577,000$ in program planning costs, which were incurred in planning and developing the filing. The portfolio costs include development and maintenance of the Statewide Coordinator platform, Workforce Development funds, and some Evaluation, Measurement and Verification ("EM\&V") for statewide coordination; the start-up costs were associated with the initial research and development of the EE Program Plan. These Programs as well as the Program costs and benefits are more fully described in the Direct Testimony of Company Witness Baatz and the accompanying ACE EE Program Plan.

[^18]Table MSWE-1

| Proposed Programs and Costs |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Sector | Core/ Utility-led | Program | Sub-Program/ Sub-Product | Total Cost PY1-PY3 |
| Residential | Core | Energy-Efficient Products | HVAC | 15,762,975 |
|  |  |  | Appliance Rebates |  |
|  |  |  | Appliance Recycling |  |
|  |  |  | Online Marketplace |  |
|  |  | Existing Homes | Home Performance with ENERGYSTAR (HPwES) | \$ 8,984,106 |
|  |  |  | Quick Home Energy Check-Up (QHEC) | \$ 8,970,810 |
|  | Utility-led | Behavioral | N/A | \$ 502,994 |
|  |  | Moderate-Income Weatherization | N/A | \$ 13,414,237 |
| Multi-family | Core | Multi-family Direct Install | N/A | \$ 3,757,222 |
| Commercial | Core | Small Business Direct Install | N/A | \$ 27,898,354 |
|  |  | Energy Solutions for Business | Prescriptive Program | \$ 11,677,549 |
|  |  |  | Custom Program |  |
|  | Utility-led | Energy Solutions for Business | Engineered Solutions | \$ 2,749,382 |
|  |  |  | Energy Management | \$ 2,029,923 |
| Portfolio Costs |  |  |  | \$ 2,875,000 |
| Total |  |  |  | \$ 98,622,553 |

## Q10. What are the energy savings associated with the proposed ACE EE Program Plan?

A10. The Company anticipates that the portfolio will produce energy savings as described in Table MSWE-2 below. For program year one ("PY1"), the savings target is equal to the projected savings in the EE Program Plan, as no PY1 targets were set by the BPU in the June 10 Order.

Table MSWE-2

| Program Year | PY1 | PY2 | PY3 |
| :---: | :---: | :---: | :---: |
| Period | Jul 21 - Jun 22 | Jul 22 - Jun 23 | Jul 23 - Jun 24 |
| Projected Consumption Baseline (MWh) | 8,610,148 | 8,453,000 | 8,401,000 |
| Savings Target (MWh) | 33,017 | 62,552 | 81,489 |
| Projected Savings (MWh) | 33,017 | 59,556 | 87,291 |
| Over/Under Target (MWh) | 0 | -2,996 | 5,802 |
| Savings Target (\%) | 0.38\% | 0.74\% | 0.97\% |
| Projected Savings (\%) | 0.38\% | 0.70\% | 1.04\% |
| Over/Under Target (\%) | 0.00\% | -0.04\% | 0.07\% |
| Percent to Target (\%) | 100\% | 95\% | 107\% |
| Cost per First Year kWh Saved (\$/kWh) | 0.409 | 0.459 | 0.389 |
| Cost per Lifetime kWh Saved (\$/kWh) | 0.031 | 0.034 | 0.032 |

Q11. Other than what is listed in Table MSWE-1 is the Company proposing any additional initiatives or pilots?

A11. No. The Company is only proposing those programs listed in Table MSWE-1 as described in detail in the ACE EE Program Plan attached to the Direct Testimony of Company Witness Baatz as Schedule (BJB)-2.

Q12. Does ACE currently implement any of the programs described in Table MSWE-1?
A12. Yes. Consistent with Exelon/ACE's merger commitments, the Company currently implements a Behavior Program supported by Opower/Oracle, which produces the Home

Energy Reports and the Quick Home Energy Check-up ("QHEC"). ACE launched the Home Energy Reports in Q3 2017 and the QHEC Program in Q1 2018. Pursuant to Paragraph 3.d. of the Joint Recommendation approved by the Board as part of the Most Favored Nation Order dated October 31, 2016 in BPU Docket EM14060581, the Company committed to spend $\$ 15$ million over five years to provide energy efficiency programs in its service territory. The Company further committed that the energy efficiency programs would serve low income customers and economically challenged areas in Southern Jersey. The Company currently implements these programs that provide cost effective benefits to customers and will continue to manage them until the $\$ 15$ million in merger funds are fully committed.

Q13. Is ACE seeking to recover costs related to the $\$ 15$ million merger commitment in this filing?

A13.
No. To be clear, ACE is not seeking cost recovery for any portion of the $\$ 15$ million merger commitment. Likewise, the costs and the savings associated with the mergerfunded program have been excluded from the cost benefit analysis described in the Direct Testimony of Witness Baatz and excluded from the cost-recovery analysis described in the Direct Testimony of Company Witness Normand.

## Q14. Why is ACE requesting the Board approve incremental funding for QHEC and the Behavior program?

A14. ACE recognizes that the merger-funded programs are not sufficient to meet the energy efficiency goals own their own. As described further by Witness Baatz, the projected total savings resulting from the remaining merger funds is $31,460 \mathrm{MWh}$ for the Behavior program and 3,933 MWh for QHEC. This amount is far short of the BPU-ordered
savings goals for ACE. Therefore, additional funding for those two programs along with new additional programs that target other customer segments is required. For this reason, ACE's EE Program Plan, including the funds requested for the Behavior program (\$0.5 million) and QHEC program (\$8.97million), and associated savings, are incremental to the merger-funded programs.

Q15. How does ACE plan to manage the overlap between the existing merger-funded programs and the new programs proposed in the ACE EE Program Plan?

A15. The QHEC and Behavior program outlined in this EE Program Plan are a continuation of the merger-funded programs so they will be offered through the entire three-year program cycle. Therefore, the ACE EE Program Plan only accounts for the costs and savings associated with the continued programs once the merger-funding commitment is fully utilized. After the ACE EE Program Plan is approved, ACE will integrate the merger-funded programs into the BPU-approved programs and manage a single portfolio of programs. Management of the program, participation rates, savings estimates, reporting, evaluations, etc. will be combined. However, the funding sources will be tracked separately. That is, merger dollars will be tracked separately from funds collected via the proposed EE-Rider surcharge (which is described in the Direct Testimony of Witness Normand).

## Q16. Please summarize the benefits of ACE's proposed programs.

Q16. There are many benefits to be gained from the implementation of ACE's proposed programs. Climate change and its social and environmental effects are among the most significant challenges we face. The Company's programs will reduce energy consumption and improve comfort in the homes of our customers, while mitigating the effects of climate
change and improving air quality for the customers we serve. The programs will lower customer bills, saving customers $\$ 552$ million on their energy cost from the installation of the measures in this program.

Additionally, as further described in Company Witness Baatz's Direct Testimony, the cost benefit analysis shows the ACE portfolio is cost effective under the New Jersey Cost Test. The three-year portfolio resulted in net benefits of $\$ 276$ and a cost benefit ratio of 3.8. This translates as follows: for every dollar ACE spends on energy efficiency programs, customers will receive $\$ 3.78$ in benefits.

## Q17. How does Company plan to report on the ACE EE Programs?

A17. The Company will ensure that it meets all standard reporting requirements required by the BPU. ACE will work with the other New Jersey utilities and the EM\&V Working Group to develop a standard reporting template and a process that supports the creation and submission of quarterly, annual, and triennial progress reports. ACE is also prepared to respond to informal requests that Staff may have on an ad hoc basis. The Company will also conduct appropriately scheduled evaluation, measurement, and verification studies. Additional detail regarding the reporting methodology is contained in the ACE EE Program Plan, attached as Schedule (BJB)-2.

## COST RECOVERY MECHANISM

Q18. Is ACE seeking cost recovery for all of the program costs described in Table MSWE$1 ?$

A18. Yes. ACE is seeking cost recovery for $\$ 98.6$ million, which represents its total incremental program expenditures over and above the merger-funded programs. ACE will
also seek recovery of $\$ 577,000$ in program planning costs incurred in connection with the preparation of this filing.

## Q19. How does ACE propose to recover the ACE EE Program costs?

A19. As further discussed in the Direct Testimony of Company Witness Normand, ACE is proposing to recover costs related to the implementation of the program through a Cost Recovery Mechanism ("CRM") that includes incremental investment and incremental Operations and Maintenance ("O\&M") costs associated with or created by the proposed programs. The incremental investment costs will be capitalized as a regulatory asset and amortized over 10 years. A return on the unamortized balance of the regulatory asset will be calculated using the Company's authorized rate of return. The incremental O\&M costs will be expensed and included within the CRM model for recovery on an annual basis.

## Q20. Has the Company evaluated the impact of the proposed ACE EE Programs on

 residential customer rates?A20. Yes. The impact of the change for program year one on all customers by rate schedule is provided in Schedule (MTN)-2. For the typical residential customer on Basic Generation Service ("BGS") service using an average of 679 kWhs per month, the proposed bill increase for PY1 is $\$ 0.30$ per month or $0.23 \%$. Below is a summary of the year-over-year and cumulative residential bill impacts for the typical residential customer on BGS service using an average of 679 kWh per month:

|  | Year 1 | Year 2 | Year 3 | Cumulative |  |
| :--- | :---: | :---: | :---: | :---: | ---: |
| Rider "EE" Proposed Rate $-\mathbf{\$ / k W h}$ | $\$ 0.000444$ | $\$ 0.000996$ | $\$ 0.001647$ |  |  |
| Residential Bill Impact - Year over Year | $\$ 0.30$ | $\$ 00.38$ | $\$ 0.42$ | $\$$ | 1.12 |
| Residential Bill Impact Percentage - Year over Year | $0.22 \%$ | $0.29 \%$ | $0.33 \%$ | $0.84 \%$ |  |

This rate impact will be mitigated by the beneficial impacts of the energy efficiency measures on the cost of electricity overall, as quantified in detail by the benefit cost analysis of Company Witness Brendon Baatz. The complete bill impact analysis for all Rate Schedules and its underlying assumptions are set forth in Schedule (MTN)-2.

Q21. Will the Company be proposing use of a modified Conservation Incentive Program ("CIP") or the Lost Revenue Adjustment Mechanism ("LRAM") to recover lost revenue due to implementation of these Programs?

A21. ACE is proposing the use of a modified CIP. Pursuant to the June 10 Order, ACE engaged in discussions with Staff, Rate Counsel, and the other EDCs to develop a modified CIP that takes into account aspects of the CIP used by certain New Jersey gas distribution companies. The proposal set forth in Witness Normand's Direct Testimony is consistent with those discussions and includes a shareholder contribution. ${ }^{7}$ Company Witness Normand's Direct Testimony provides the details, calculation and applicability of this mechanism to the Company's rate schedules.

## WORKFORCE DEVELOPMENT

## Q22. Please describe ACE's plan for workforce development and job training programs

 and partnerships?A22. ACE recognizes that a policy goal of New Jersey is to increase the clean energy economy by increasing the number of trained and certified professional and skilled trade persons that can complete energy efficiency projects. The Company is prepared to support that goal by collaborating with the Workforce Development Working Group ("WFD WG")

[^19]established by the BPU, and by filling these jobs with local hires so that the benefits of these programs are seen in the communities we serve. With an investment level of $\$ 600,000$, ACE will partner with the established WFD WG, as well as other community action agencies and trade allies to hire and train local staff to meet this increased demand.

While ensuring there is trained staff available is critical to the success of the program, the Company also wants to increase equity within our community in hopes of growing local diverse and minority owned businesses. This effort will help those looking to establish businesses in the energy efficiency sector. The Company, in partnership with the established WFD WG, will establish a program to help with licensing and certification, mentorship and business acumen to ensure new businesses can grow and thrive.

Q23. In addition to the proposed $\$ 600,000$ to support the WFD WG initiatives, what other initiatives has ACE implemented that support workforce development in Southern New Jersey?

A23. In 2018, the Company joined with community partners to launch a six-year, \$6.5 million program to educate and train the future energy workforce and drive New Jersey's clean energy economy. The Workforce Development Initiative ("WDI"), to be paid in installments through 2024, will provide funds to expand job training and workforce development efforts to help improve employment opportunities in ACE's Southern New Jersey service area. WDI includes the following programs:

- Get Into Energy (GIE) Math and Test Prep Boot Camp
- Women in Sustainable Employment (WISE) Pathway
- ACE Line School
- High School Energy Career Academy
- County Driven Initiatives

As a result of this funding, ACE can utilize existing programs to support the transition of interested employees towards other potential careers in the energy field. The delivery and design of the programs can be modified and timed to align with the job changes and will be targeted to provide reskilling for interested workers. The Company is exploring ways to also adjust its existing workforce development programs to support careers in energy efficiency. The funding for these programs is a part of Exelon's merger commitment and as such there is no impact to ACE ratepayers. Additional detail concerning each program is attached to this testimony as Schedule (MSWE)-1. Exelon's investment in the WDI programs will continue through 2025.

## Q24. What organizations have you partnered with for the WDI?

A24.
ACE has partnered with vocational schools (Atlantic County Institute of Technology, Cape May Vocational School, and Cumberland County TEC) and County workforce development boards (Atlantic, Cumberland, Cape May, Salem, Camden, and Gloucester County) to launch the initiative. Moreover, the GIE Boot Camp, WISE Pathway, and High School Energy Career Academy were developed by the Center for Energy Workforce Development.

Q25. Please describe the expected benefits that will result from these workforce development and job training programs and partnerships.

A25. An analysis of the proposed ACE EE Program Plan's impact on job creation was done by Gabel Associates, Inc. using the IMPLAN model. The details of this modeling method and results are discussed in Company Witness Baatz's Direct Testimony and is included in the ACE EE Program Plan. Based on the IMPLAN model results ACE
anticipates creation of up to 6,062 job years as a result of the program investment. The Company's goal is to ensure that these new jobs are filled locally and equitably across the communities we serve. Our experience in ACE's sister companies has shown that investing in energy efficiency allows for: 1 ) small business owners to grow their business and invest that increased cash flow into hiring new staff or opening additional stores; 2) residential customers can stabilize their bill, reduce arrearages, and increase comfort and safety in the home; and 3) new trade allies and contractors that support the energy efficiency programs will grow their business by promoting energy efficiency measures and projects.

## SUMMARY AND CONCLUSION

## Q26. Please summarize the Company's Petition.

A26. This filing consists of a Petition for approval of ACE's EE Program Plan. It includes this Direct Testimony and the Direct Testimony of two other witnesses, plus schedules and attachments. Those witnesses and the topics they address are as follows:

- Mr. Brendon J. Baatz, Gabel Associates, provides testimony on the ACE EE Program Plan and Cost Effectiveness.
- Mr. Michael T. Normand, Manager, Revenue Requirements, provides testimony concerning the revenue requirement calculation, the rate design, cost recovery and EE Rider proposed, bill impacts, as well as the CIP.

Q27. Has the Company complied with the Minimum Filing Requirements as specified in the June 10 Order?

A27. Yes, the Company has addressed all Minimum Filing Requirements, and has provided the necessary information as indicated in Exhibit A to the Petition. Any
information deemed confidential will be circulated upon execution of a non-disclosure agreement.

Q28. Are there any Minimum Filing Requirements that you are requesting a waiver from or would like to comment upon?

A28. No.
Q29. Does this conclude your testimony?
A29. Yes, it does.

## Schedule (MSEW)-1

# Atlantic City Electric Company <br> Workforce Development Programs 

## Summary

As a condition of its merger agreement, Atlantic City Electric Company (ACE) will be investing over $\$ 6.5$ million in workforce development programs in its service territory over a 6 -year period.

Features: Merger commitment. Agreements and funding for seven external partners were approved and distributed in May of 2018. The programs were implemented in fall of 2018 and spring of 2019.

## Energy Workforce Programs

- ACE-Program Funding (\$6.542 over 6 years- $\$ 3.572 \mathrm{M}$ for WFD solutions recommended by Exelon/PHI; \$2.970M for non-energy related WFD initiatives identified by the WDBs).
o Features: ACE funds the following programs to raise career awareness and address skill gaps of individuals who are interested in pursuing a career in the energy field. The programs are CAST Math and Test Prep Course, Line School, HS Energy Career Academy, and the Women in Sustainable Employment Careers Course.
o ACE partners with the following groups to run their energy workforce programs:
- Atlantic County Workforce Development Board
- Cumberland-Salem-Cape May Workforce Development Board
- Camden County Workforce Development Board
- Gloucester County Workforce Development Board
- Cape May County Technical School (High School)
- Atlantic County Institute of Technology (High School)
- Cumberland County TECH /Cumberland County Board of Vocational Education (High School)
- Get Into Energy (GIE) Math and Test Prep Boot Camp (\$60,000 annually).
o Features: The Math and Test Preparation workshop is focused on applied math skills for the energy industry and teaches concepts that are critical to success within the industry.
o Highlights: The workshop addresses the skills gaps on the Edison Electric Institute's (EEI) tests, primarily the Construction and Skills Trade (CAST) test and the impact of those skills gaps on the diversity of qualified candidate pools.
o Results: The workshop increases candidate pool diversity, increases hired within the service territory, and is aligned with merger commitments.
- Women in Sustainable Energy Employment (WISE) (\$60,000 annually).
o Features: WISE Pathways is a career exploration course designed for women to consider non-traditional, in-demand jobs in the construction, gas, water, electric, and energy industries.
o Highlights: The 40-hour-long curriculum provides women the opportunity to learn about career paths in these industries.
o Results: The workshop increases candidate pool diversity and is aligned with merger commitments.
- Line School (\$250,000 annually).
o Features: This four-week school produces hands on instruction to the individuals seeking a career as a lineperson.
o Highlights: The course covers the fundaments of line work and provides the participant with training in the areas of truck and equipment operations.
0 Results: The school increases awareness and success rates on physical tests and is aligned with merger commitments.
- CEWD High School Energy Career Academy (\$225,000 annually).
o Features: The High School Energy Career Academy focuses on preparing high school students for entering post-secondary education or moving directly to employment with a utility, helping communities to "grow their own."
o Highlights: CEWD's High School Energy Career Academy model is extensive and not only helps students to build their knowledge of the energy industry but includes employability skills and integrated academic components.
o Results: Aligned with merger commitments.


# Direct Testimony of Brendon J. Baatz 

## ATLANTIC CITY ELECTRIC COMPANY

## BEFORE THE NEW JERSEY BOARD OF PUBLIC UTILITIES DIRECT TESTIMONY OF BRENDON J. BAATZ BPU DOCKET NO.

## I. INTRODUCTION

## Q1. Please state your name, business address, and position.

A1. My name is Brendon J. Baatz and my business address is 417 Denison Street, Highland Park, New Jersey, 08904. I am presently employed as a Vice President at Gabel Associates, Inc., an energy, environmental, and public utility consulting firm.

## Q2. Please summarize your professional experience and educational background.

A2. I have been employed with Gabel Associates since March of 2018. While at Gabel Associates, I have worked for a range of public and private clients on various issues in the utility industry. The issues include retail and wholesale electric rate design, renewable energy project cost benefit analysis, and electric vehicle utility policy. I have also worked extensively on energy efficiency ("EE") program design, policy, and cost benefit analysis for several clients, including gas and electric utilities.

Prior to my employment with Gabel Associates, I managed the utility program at the American Council for an Energy Efficient Economy ("ACEEE"). There I focused on various issues related to utility-sector EE programs, including efficiency program design, state policies, and regulatory issues affecting EE, including electric and gas rate design. While at ACEEE I published numerous reports on EE programs and policy, and also regularly spoke at conferences on related issues. I also testified in various proceedings on these issues during that time.

Prior to my employment with ACEEE, I was employed with the Federal Energy Regulatory Commission ("FERC"). During my employment with FERC, my primary responsibilities were the review and analyses of electric utility cost of service studies in wholesale transmission and electric power rate cases. I also worked on other litigated issues while at FERC, including but not limited to transmission capacity reservation rights, municipal power contracts, and formula rate structure and protocols. Prior to my employment with FERC, I held positions with the Maryland Public Service Commission ("PSC") as an energy analyst and the Indiana Office of Utility Consumer Counselor ("OUCC") as a utility analyst. While at the Maryland PSC, I worked on the EmPOWER Maryland programs focusing on program design, avoided cost development, and other policy issues. While working at the OUCC, I testified on a variety of utility issues, including but not limited to rate design, renewable energy credit compensation, and utility petitions for construction. I also represented the agency in several oversight boards for utility EE programs.

I hold a Master of Public Affairs degree from Indiana University Bloomington and a Bachelor of Science in political science from Arizona State University. I have continued my education through attendance of various seminars and conferences. I have also completed formal training in rate design, cost of service, depreciation, and other utility regulatory matters.

My resume is attached as Schedule (BJB)-1.

## Q3. Have you previously testified before the New Jersey Board of Public Utilities ("BPU" or "Board")?

A3. Yes. I previously testified in BPU Docket Nos. GR18080860 and GR20070503. ${ }^{1}$
Q4. What is the purpose of your direct testimony in this case?
A4. The purpose of my testimony is to support the Petition filed by Atlantic City Electric Company ("ACE" or the "Company") to establish and implement EE programs pursuant to the Clean Energy Act ${ }^{2}$ and the Board Order Directing the Utilities to Establish Energy Efficiency and Peak Demand Reduction Programs. ${ }^{3}$ I am sponsoring the ACE 2021-2023 Energy Efficiency Program Plan (the "Plan"), as well as the supporting cost effectiveness for the proposed programs.

Q5. Are you sponsoring any schedules in connection with your direct testimony?
A5.
Yes. I am presenting the following schedules, which have been prepared under my direction and supervision and are accurate and complete to the best of my knowledge and belief. These schedules contain information responsive to the Minimum Filing Requirements ("MFRs") as referenced in the MFR Index attached to the Petition as Exhibit A and as approved by the Board in its June 10, 2020 Order in BPU Docket Nos. QO19010040, QO19060748, and QO10791004 (the "June 10 Order"). The schedules attached include:
(a) Schedule (BJB)-1 - Baatz Resume;
(b) Schedule (BJB)-2 - ACE 2021-2023 Energy Efficiency Program Plan;

[^20](c) Schedule (BJB)-3 - ACE Energy Savings Target Development;
(d) Schedule (BJB)-4 - Portfolio Cost Effectiveness Results;
(e) Schedule (BJB)-5 - Cost Benefit Analysis Workpapers (confidential);
(f) Schedule (BJB)-6 - Summary of Avoided Emissions;
(g) Schedule (BJB)-7 - Summary of Economic Development and Job Creation; and
(h) Schedule (BJB)-8 - Cost to Achieve Values by Sector

## Q6. Does the filing meet the Board's stated goals?

A6. Yes. The filing presents a cost-effective EE plan to enable the Company to meet the goals outlined in the June 10 Order. The proposed program plan, in addition to the currently approved merger programs, will provide energy savings opportunities to all ACE customers, stimulate economic development in New Jersey, and reduce environmental pollution, including carbon dioxide emissions.

## II. 2021-2023 ENERGY EFFICIENCY PROGRAM PLAN

Q7. Please describe the Atlantic City Electric 2021-2023 Energy Efficiency Program Plan.

A7.
The Atlantic City Electric 2021-2023 Energy Efficiency Program Plan ("EE Program Plan") is composed of a suite of program offerings designed to provide energy saving opportunities to all sectors and end uses in ACE's service territory. The EE Program Plan includes two types of programs, Core Programs and Utility Led Initiatives. The Core programs were designed in close coordination with the other electric and gas utilities in New Jersey. These programs build off the current Office of Clean Energy ("OCE") programs, while including enhancements to grow energy savings and optimize program
design. The utility led initiatives include programs that are specific to the ACE service territory. Several of these programs were also developed in close coordination with other utilities to ensure consistency in programs and reduce marketplace confusion among customers and contractors.

There were three primary goals in designing the Plan. First, the plan is designed to meet the energy savings targets outlined by the Board in the June 10 Order. While there is not a specific target for program year one, the plan aimed to scale Company EE offerings that would support the satisfaction of targets in future program years. The utility target for program year two is $0.74 \%$ of retail sales and $0.97 \%$ for program year three. The energy savings from this EE Program Plan, in combination with the energy savings form the existing merger programs, meet the energy savings targets in the June 10 Order. Second, the EE Program Plan is designed to meet the objectives outlined in the June 10 Order. These objectives include the achievement of full economic, cost effective energy usage and peak demand reductions; universal access to EE measures; benefits for low-income communities and customers; the promotion of emerging EE technologies; and reasonable and prudent expenditures. ${ }^{4}$

The third goal in designing the EE Program Plan was to ensure the Core program offerings served the residential, commercial, industrial, and multifamily sectors outlined in the June 10 Order. The Plan provides significant opportunities to all customers for deep energy savings under a whole building approach, but also provides opportunity for single or multiple measure pathways for customers unable or unwilling to undertake a whole

[^21]building project. The Plan also provides comprehensive opportunities for low-to-moderate income ("LMI") customers through multiple programs.

## Q8. Does the ACE filing meet the Board's cost effectiveness objectives and standards?

A8.
minimizing costs to ratepayers and meeting the statutory energy savings targets. The cost benefit analysis shows the ACE portfolio is cost effective under the New Jersey cost test. The three-year portfolio resulted in net benefits of $\$ 276$ million and a cost benefit ratio of 3.78. This implies that, for every dollar ACE spends on EE programs, customers will receive $\$ 3.78$ in benefits.

Q9. Please provide an overview of the proposed program portfolio.
A9. As noted above, the subprograms include a mix of Core and Utility led initiatives. Table 1 shows the proposed program portfolio and the associated costs over the three year program period.

Table 1. ACE EE Plan Proposed Programs and Costs

| Sector | Type | Program | Sub-Program | Total Cost PY1-PY3 $\qquad$ <br> (\$) |
| :---: | :---: | :---: | :---: | :---: |
| Residential | Core | Energy-Efficient <br> Products | HVAC | 15,762,975 |
|  |  |  | Appliance Rebates |  |
|  |  |  | Appliance Recycling |  |
|  |  |  | Online Marketplace |  |
|  |  | Existing Homes | Home Performance with ENERGYSTAR | 17,954,916 |
|  |  |  | Quick Home Energy CheckUp |  |
|  | Utilityled | Home Energy <br> Reports | N/A | 502,994 |
|  |  | Moderate-Income Weatherization | N/A | 13,414,237 |
| Multi-family | Core | Multi-Family | N/A | 3,757,222 |


| Commercial | Core | Small Business Direct Install | N/A | 27,898,354 |
| :---: | :---: | :---: | :---: | :---: |
|  |  | Energy Solutions for Business | Prescriptive \& Custom | 11,677,549 |
|  | Utilityled | Energy Solutions for Business | Engineered Solutions | 2,749,382 |
|  |  |  | Energy Management | 2,029,923 |
| Portfolio Costs |  |  |  | 2,875,000 |
| Total |  |  |  | 98,622,553 |

Q10. Please describe how the core programs were developed.
A10. The Core programs were developed in close coordination with the other electric and gas utilities in New Jersey in the time leading up to the Board's direction to file program petitions by September 25, 2020. These programs were developed to ensure the program offerings would provide comprehensive solutions to all types of customers and end uses, avoiding confusion in the market among customers and contractors, as well as drive cost effective energy savings. The EE Program Plan, attached as Schedule (BJB)-2, provides significant detail on Core program design, delivery approach, measures, and other details.

## Q11. Please describe how the ACE led initiatives were developed.

A11. The ACE led initiatives were developed to build off the foundation of core EE programs. While the core programs offer numerous pathways and incentive mechansims to customers to achieve energy savings, the Company believes there is ample potential in its service territory for expanded energy offerings to address the needs of customers which may not fit in the state-wide designs found in the core programs. Based on the perceived
additional program needs not covered by the Core programs, the ACE led initiatives include the Quick Home Energy Check Up ("QHEC") and Home Energy Report programs, which ACE is steeped in experience administering due to the fact that the Company currently offers these programs through merger funds in its ACE territory, as well as by PHI sister utilities in Maryland, Potomac Electric Power Company ("Pepco") and Delmarva Power \& Light Company ("Delmarva"). These programs have been offered for years in other PHI service territories. ACE relied on the lessons learned from these programs to develop program delivery, energy savings, and other important characteristics. Finally, the ACE led initiatives also include the Moderate-Income Weatherization program, which is already offered by South Jersey Gas ("SJG") in the ACE service territory. ACE worked closely with SJG (and other utilities) in developing this program to ensure consistency.

The commercial and industrial ACE led initiatives were developed based on identified additional program opportunities not covered by the Core programs. The Engineered Solutions program is designed based on the widely successful Public Service Electric and Gas Company program model. The Energy Management program was developed based on a similar programs offered by Pepco and Delmarva in Maryland. This program has been offered for multiple years in Maryland and ACE relied on this history and insight to build a well-formed program offering in New Jersey.

It is also important to note that, although ACE proposed Utilty led initiatives are being proposed outside of the core structure, ACE spent substantial time coordinating with other gas and electric utilities in order to assure that customers experience consistent offerings where possible.

The EE Program Plan, attached as Schedule (BJB)-2, provides significant detail on
ACE led initiatives program design, delivery approach, measures, and other details.

## Q12. Please describe how EE Program Plan addresses the needs of LMI customers.

A12. There are many energy savings opportunities for LMI customers in the Plan. I detail these opportunities by subprogram:

1. Efficient Products - This program will provide additional rebates on specific measures for income qualified customers.
2. Home Energy Reports - This program will provide home energy reports to LMI customers at no cost, which will drive energy savings and awareness of other program offerings.
3. Quick Home Energy Check Up - This program will provide an energy audit and installation of energy savings measures at no cost to participants. The program will provide an easy pathway for LMI customers to realize immediate bill savings. This program also serves rental homes, which is often a barrier to other EE programs.
4. Moderate-Income Weatherization - This program provides a deeper energy audit with the installation of free energy savings measures, including building shell and weatherization measures, to customers in the 250-400\% of federal poverty level. These customers are currently unable to participate in the Comfort Partners program (limited to $250 \%$ above federal poverty line), but often lack the financial resources to participate in other programs like Home Performance with Energy Star. Additionally, pursuant to the feedback ACE heard during EE Stakeholder meetings, the program includes resources to address health and safety concerns in the home to ensure customer participation and achieve greater energy savings.
5. Multifamily Program - This program includes a component that will offer an audit and installation of no cost energy saving measures for occupants of multifamily units. Like the Quick Home Energy Check Up subprogram, this offering provides an easy pathway to LMI customers, including renters, to realize immediate energy savings at no cost.

## Q13. Please describe how the ACE energy savings target was developed.

A13. The ACE energy savings target is based on guidance from the Board in the June 10 Order. In the Order, Staff recommends that "the average usage for the purposes of compliance be calculated based on the average of retail sales for the most recent three-year years relative to the program year for which the target is applicable." ${ }^{5}$ Accordingly, the savings target for each program year is based on an average of the three prior years. For program year one, which runs from July 1, 2021 through June 30, 2022, the savings target is based on the average of the actual sales in 2018-2019 and forecasted sales for 2020. For program year two, the savings target is developed based on the average of actual sales in 2019, and forecasted sales in 2020-2021. The program year three target was based upon forecasted sales for 2021-2023. The baseline developed through this approach was then multiplied by the energy savings target percentages in the June 10 Order to determine the MWh goals. The target development is detailed in Schedule (BJB)-3.

## III. COST EFFECTIVENESS ANALYSIS OF ACE EE PROGRAM PLAN

Q14. Did you conduct cost effectiveness analysis of the program portfolio in the ACE Plan?
A14
Yes. I prepared the cost-benefit analysis ("CBA") which calculates and details the results of the six tests prescribed in the MFRs as required by the Board. This entailed developing a model that analyzed measure-specific details and computed the estimated

[^22]costs and savings of each program for use in the New Jersey Cost Test ("NJCT"), the Total Resource Cost ("TRC") test, the Participant Cost test ("PCT"), the Program Administrator Cost ("PAC") test, the Ratepayer Impact Measure ("RIM") test, and the Societal Cost test ("SCT"). This testimony presents the methodology and results of the six CBA tests required by the Board's MFRs for the Company's EE program results for the plan period of July 1, 2021 through June 30, 2024. These results allow the BPU to evaluate the performance of the program offerings during this time period.

## Q15. Please describe the CBA tests required by the Board's MFRs.

> A15. In the June 10 Order, the Board updated the EE MFRs. Section V.a. in the updated MFRs, states: The utility shall conduct a benefit-cost analysis of the programs and portfolio using the New Jersey Cost Test, Participant Cost Test, Program Administrator Cost Test, Ratepayer Impact Measure Test, Total Resource Cost Test, and Societal Cost Test that assesses all program costs and benefits from a societal perspective i.e., that includes the combined financial costs and benefits realized by the utility and the customer. The utility may also provide any additional benefit-cost analysis that it believes appropriate with supporting rationales and documentation.

Each test listed above is designed to provide a different perspective on the costeffectiveness of the proposed programs. The six cost effectiveness tests prescribed by the Board provide the following perspectives for decision makers:

- New Jersey Cost Test - The New Jersey Cost Test is the primary cost effectiveness test for EE programs in New Jersey. The test measures net costs of the program as a resource option based on total costs, similar to the total resource cost test, but also includes additional benefits to address specific State policy considerations in New Jersey, like the social cost of avoiding carbon dioxide emissions.
- $\underline{\text { Societal Cost Test }}$ - The Societal Cost Test measures the net costs of a program as a resource option based on the total costs of the program, including both the participants' and the utility's costs. The SCT from the TRC test in that it includes the effects of societal impacts such as environmental impacts to the economy, excludes tax credit benefits, and uses a different (societal) discount rate.
- Total Resource Cost Test - The Total Resource Cost Test measures the net costs of a program as a resource option based on the total costs, including both the participant and the utility costs of the program.
- Participant Cost Test - The Participant Cost Test is the measure of the quantifiable benefits and costs from the perspective of program participants. Since many customers do not base their decision to participate in a program entirely on quantifiable variables, this test is not a complete measure of the benefits and costs of a program to a customer.
- Program Administrator Cost Test - The Program Administrator Cost Test measures the net costs of a program as a resource option based on the costs incurred by the program administrator or utility (including incentive costs) and excluding any net costs incurred by the participant. The benefits are similar to the TRC benefits. Costs include the total program costs. This test measures the net economic impact of investing in EE programs from the perspective of the utility.
- Ratepayer Impact Measure Test - The Ratepayer Impact Measure test measures what happens to customer rates due to changes in utility revenues and operating costs caused by the program.

In aggregate, these tests provide the Board with multiple viewpoints of the benefits and costs associated with the programs.

## Q16. Please describe your approach to assessing cost effectiveness using the six tests described above.

A16. I completed all six tests using guidance from the Board's Order Adopting the First New Jersey Cost Test ("August 24 Order") and the California Standard Practice Manual. ${ }^{6,7}$ The August 24 Order provided specific guidance on how to estimate costs and benefits of programs, including assumptions on line losses and discount rate, for the New Jersey Cost Test. I applied the Board's guidance on the development of specific benefits and costs to all tests conducted. For the Societal Cost Test, I included additional benefits that were not included in the August 24 Order. For those benefits, I relied on industry best practice methods. These benefits included environmental benefits associated with reducing $\mathrm{SO}_{2}$ and $\mathrm{NO}_{\mathrm{x}}$, economic development benefits, market hedge value of reducing retail sales, avoided Renewable Portfolio Standards ("RPS") compliance, and others. These benefits are significant and not included in the NJCT. ${ }^{8}$

Q17. Did you evaluate all the programs being proposed using the six CBA tests required in the MFRs?

[^23]A17. Yes, I evaluated program cost effectiveness for all six tests. The results of this analysis are presented in Schedule (BJB)-4. The supporting workpapers for this analysis are shown in Schedule (BJB)-5. The costs and benefits associated with the approved merger-funded energy efficiency programs were eliminated from inclusion in all of the tests.

## Q18. Please summarize your conclusions.

A18. The CBA shows the ACE portfolio is cost effective under the New Jersey Cost Test. Under the NJCT, the three-year portfolio resulted in net benefits of $\$ 276$ million and a cost benefit ratio of 3.78. This implies that, for every dollar ACE spends on EE programs, customers will receive $\$ 3.78$ in benefits.

The portfolio also produced significant environmental benefits. I estimate that the energy savings produced by the ACE Plan will reduce carbon dioxide (" $\mathrm{CO}_{2}$ ") emissions by 1.5 million tons, sulfur dioxide (" $\mathrm{SO}_{2}$ ") emissions by 885 tons, and nitrogen oxide (" $\mathrm{NOx}_{\mathrm{x}}$ ) emissions by 783 tons. ${ }^{9}$ The displacement of these emissions will avoid human health and environmental harms, providing additional benefits to ACE's customers.

In addition, the portfolio will generate extensive economic activity and will spur job creation due to the millions of dollars being injected into New Jersey's economy. Based upon an analysis of economic value added to New Jersey's Gross Domestic Product conducted in a manner consistent with Board president, I estimate that the portfolio will increase New Jersey's Gross Domestic Product by \$504 million over the lifetime of the EE

[^24]measures installed. ${ }^{10}$ This is vitally important as the State faces the rebuilding effort from the economic contraction caused by the COVID-19 pandemic.

## Q19. Did you also review the ACE cost to achieve values in relation to the Board's proposed guidelines from the June 10 Order?

A19. Yes. The ACE sector level cost to achieve values are shown in Schedule (BJB)-8. As the schedule shows, residential program cost to achieve value exceeded the Board's guidelines. The ACE residential programs were designed to build from those currently offered by OCE with modifications geared to achieve deeper, longer lasting savings. The first-year cost to achieve metrics do not capture the long term focus of these programs, as illustrated by the fact that the ACE lifetime cost to achieve is 3.3 cents per kWh , which is not out of line with the national average for this metric. ${ }^{11}$ Further, the programs are designed to be, and are, cost-effective based upon the New Jersey Cost Test, and therefore will deliver substantial benefits to New Jersey. As stated above, these programs are good investments for the State because for, every dollar spent, they will generate $\$ 3.78$ dollars of benefits. Finally, the derivation of the Board's cost to achieve guidelines was not made available for review and was stated to be based upon program portfolios from Massachusetts and Rhode Island, which are very mature portfolios and not like comparisons for New Jersey at the current time. While both states have similar energy savings targets as New Jersey, they are fundamentally different because of the maturity of the EE programs.

[^25]
## IV. COST-BENEFIT ANALYSIS ASSUMPTIONS

Q20. What types of cost benefit analyses did you prepare?
A20. I prepared analysis for each of the six CBA tests required by the Board's MFRs

## Q21. What methodology did you use to undertake these calculations?

A21 I relied on methodology outlined in the Board's August 24 Order and the California Standard Practice Manual. ${ }^{12,13}$ Within the CBA tests, there are a wide range of costs and benefits used to characterize program integrity, some of which are applicable in conducting certain tests but not others. Table 2 shows a list of specific costs and benefits and the tests they apply to:

[^26]|  | NJCT | SCT | TRC | PCT | PAC | RIM |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Program Benefits |  |  |  |  |  |  |
| Avoided Wholesale Electric Energy | X | x | x |  | x | x |
| Avoided Electric Ancillary Services | x | X | X |  | x | x |
| Avoided Wholesale Electric Capacity | x | X | x |  | x | x |
| Avoided Wholesale Natural Gas | x | x | x |  | X | X |
| Demand Reduction Induced Price Effect | X | X | X |  | X | X |
| Avoided RPS REC Purchases |  | X |  |  | x | X |
| Avoided Wholesale Volatility |  | X |  |  | X | X |
| Avoided T\&D | X | X | x |  | X | x |
| Avoided Retail Electric and Gas Costs |  |  |  | x |  |  |
| Customer Rebates and Incentives |  |  |  | X |  |  |
| Utility Lost Revenues |  |  |  |  |  | x |
| Non-Energy Benefits 5\% Adder | x |  |  |  |  |  |
| Low-Income Benefit 10\% Adder | x |  |  |  |  |  |
| Avoided Emissions Impacts ( $\mathrm{CO}_{2}$ ) | x | x |  |  |  |  |
| Avoided Emissions Impacts ( $\mathrm{SO}_{2} \& \mathrm{NO}_{\mathrm{x}}$ ) |  | X |  |  |  |  |
| Economic Development Benefits |  | x |  |  |  |  |
| Program Costs |  |  |  |  |  |  |
| Incremental Costs | x | x | x |  |  |  |
| Participant Costs |  |  |  | x |  |  |
| Administration Costs | x | x | x |  | X | x |
| Customer Rebates and Incentives |  |  |  |  | X | x |
| Utility Lost Revenues |  |  |  |  |  | x |

Table 2: Costs and Benefits Utilized in CBA Tests

## Q22. Please describe the Program Benefits shown in Table 2.

A22. The following sections describe the benefits and calculation approach.

## 1. Avoided Wholesale Electric Energy Costs

The avoided wholesale electric energy costs benefit represents the wholesale electric market purchases that would be avoided as a result of reductions in energy usage associated with the programs. Consistent with the New Jersey Cost Test guidance document, this value was estimated using the three year average of historic PJM energy
prices. ${ }^{14}$ The prices were then forecasted using a blend of energy market forward trading price for PJM-Western Hub, the most liquidly traded zone in PJM, and forecasted prices from the Energy Information Administration ("EIA") in its newest (currently 2020) Annual Energy Outlook generation reference case for the PJM/East region. ${ }^{15}$ Values were calculated for on- and off-peak prices on a monthly basis. All values were adjusted to account for marginal line losses on the ACE and PJM systems, and sales and use tax.

## 2. Avoided Electric Ancillary Services Costs

The avoided electric ancillary services costs benefit represents the wholesale electric ancillary service market purchases that would be avoided as a result of reductions in energy usage associated with the programs. Consistent with the New Jersey Cost Test guidance document, this value was estimated using the three-year average of historic PJM ancillary service prices based upon data from PJM's Independent Market Monitor. ${ }^{16}$ The prices were then forecasted using the electric energy forecast described above.

## 3. Avoided Wholesale Electric Capacity Costs

The avoided wholesale electric capacity costs category captures the wholesale reduction in PJM capacity as a result of the reductions in electric demand associated with the programs. I used actual cleared PJM Eastern Mid-Atlantic Area Council Locational Deliverability Area prices where available. Clearing prices were forecasted based upon a

[^27]baseline of the average of the previous three delivery year clearing prices. Prices were escalated based upon a regression forecast of how capacity prices have increased over time. All values were adjusted to account for marginal line losses on the ACE and PJM systems, PJM's Forecast Pool Requirement to account for avoided reserve requirements, and sales and use tax.

## 4. Demand Reduction Induced Price Effect Benefits (Electric \& Gas)

The demand reduction induced price effects ("DRIPE") price suppression (also known as merit order benefits) is a benefit that captures the reduction in wholesale electric and natural gas market prices to all customers, not just participants, as a result of EE. Wholesale electric and natural gas markets are fundamentally supply and demand based therefore, downward movement in the electric or natural gas demand curve as a result of reduced consumption should result in less expensive generation resources being dispatched for electricity, and less expensive natural gas delivered. If either market "clears" at a lower price, the associated reductions in market prices flow through to all customers.

Both electric energy and capacity DRIPE benefits were estimated using a univariate regression model. This approach is consistent with the NJCT guidance document. ${ }^{17}$

## 5. Avoided Wholesale Natural Gas Costs

The avoided wholesale natural gas costs category captures wholesale natural gas market purchases that would be avoided as a result of reduction in energy usage associated with the programs.

[^28]The value of avoided natural gas costs is estimated using New York Mercantile Exchange (also referred to as NYMEX) forward trading prices for Henry Hub adjusted for transportation to Transcontinental Pipeline (Transco) Z6 Non-NY North delivery point. The underlying Henry Hub supply forecast was combined with the Transco Z6 Non-NY North basis to determine the avoided cost projection. All values were adjusted to account for average losses and sales and use tax. This approach is consistent with the prescribed method in the New Jersey Cost Test guidance document. ${ }^{18}$

## 6. Avoided RPS REC Purchase Costs

The avoided RPS REC purchase cost estimates the reduced volume of RECs that must be purchased by New Jersey's electric retail suppliers as a result of EE electricity reductions. The New Jersey RPS sets the total volume requirement of Renewable Energy Certificates ("RECs") that must be purchased as a percentage of retail load. A reduction in retail load due to EE will reduce the total number of RECs required to be purchased.

Forecast market prices for New Jersey Class I RECs, Class II RECs and Solar RECs (also called SRECs) (legacy, transition, successor) were used based upon an internal supply-demand analysis and compliance costs for the three New Jersey REC markets.

## 7. Avoided Wholesale Volatility Costs (Electric and Gas)

The avoided wholesale volatility cost category estimates the value of avoiding risk of wholesale purchases. Wholesale electric and natural gas prices are inherently risky as they are market-based and not fixed in price or volume. Large fluctuations in prices expose customers and retail suppliers to risks that ultimately are priced into retail rates. Energy efficient measures and practices amount to a purchase of energy service which does not

[^29]contain the price volatility implicit in the price of electricity and natural gas. By reducing the overall energy purchases of customers, customers are exposed to less fuel volatility. In this regard, EE can be viewed as an energy resource that does not contain the price volatility embedded in purchases from the electric and gas supply systems.

The risk avoidance benefit of EE was applied as a price adder to the cost of electricity and natural gas (only in the SCT). The price adder was determined based upon a review of studies and regulatory decisions. While there is some variation among the studies, a conservative premium based on these precedents equal to $10 \%$ of electric and natural gas costs was assumed. ${ }^{19}$
8. Avoided Transmission and Distribution ("T\&D") Costs

The value of avoided T\&D was estimated using the methods prescribed in the NJCT guidance document. For transmission, the most recent Network Integrated Transmission Service (also referred to as NITS) rate for the ACE service territory was used. ${ }^{20}$ For distribution, the value was estimated in the manner prescribed by the Board in the NJCT guidance document. This required estimating the total distribution charges that would have

[^30]been paid by program participants in the absence of the program and then subtracting the total distribution charges the customer paid after the implementation of the EE measures. ${ }^{21}$

## 9. Avoided Retail Electric and Natural Gas Costs

The avoided retail electric and natural gas cost categories captures the actual bill savings to participants of the programs. A key benefit of EE is reduced consumption by participants which results in reduced utility costs.

Avoided retail electric costs were calculated based upon the electric charges and applicable rate classes in ACE's Tariff for Electric Service. This method results in a "price to compare" analysis, as only portions of the tariff which would be offset as a result of the programs are included in the analysis. By way of example, customers will not offset any of the monthly fixed service charge, so avoiding that charge was not included in the retail electric savings analysis. Each charge was escalated, by component, to account for separate escalation rates for distribution and supply charges. Charges related to electric delivery and transmission were escalated at $2.0 \%$ per year and electric energy and capacity supply charges were escalated in a manner consistent with the wholesale market escalations explained above.

Avoided retail natural gas costs were calculated based on the natural gas charges and applicable rate classes available in SJG's Tariff for Gas Service. This method results in a "price to compare" type analysis, as only portions of the tariff which would be offset as a result of the programs are included in the analysis. By way of example, customers will not offset any of the monthly fixed service charge so that avoiding that charge was not

[^31]included in the retail natural gas savings analysis. Each charge was escalated, by component, to account for separate escalation rates for distribution and supply charges. Charges related to natural gas delivery were escalated at $2.0 \%$ per year while natural gas supply charges were escalated in a manner consistent with the wholesale market escalations explained above.

## 10. Customer Rebates and Incentives

The customer rebate and incentive cost category capture the direct rebate incentives provided to participants of the programs. Depending on perspective, customer rebates and incentive costs can either be a benefit to a program (to participants) or a cost to programs (to the utility and ultimately, ratepayers). This benefit is only realized in the participant cost test, as that test singles out the experience of a participant in the programs. The timevalue of money associated with the provision of loans is also a benefit to customers (and costs to the utility and ultimately, ratepayers), and is captured as a benefit in the PCT, and as a cost in the PAC and RIM tests.
11. Avoided Emissions Damages

The avoided emissions damages category captures the economic value (also known as the "avoided social cost") of reductions in $\mathrm{CO}_{2}, \mathrm{NO}_{\mathrm{x}}$, and $\mathrm{SO}_{2}$. EE programs displace power plant emissions, which reduce human health and environmental harms, also known as damages. I did not include any other criteria for air pollutants or greenhouse gases.

To estimate the displaced $\mathrm{CO}_{2}$, I relied on the electric emissions factor of 1,374 pounds per MWh and natural gas emission factor of 11.7 pounds per therm, pursuant to
the NJCT guidance document. ${ }^{22}$ The avoided damages for $\mathrm{CO}_{2}$ were estimated using the "Social Cost of Carbon for Regulatory Impact Analysis - Under Executive Order 12866," produced by the Interagency Working Group on Social Cost of Greenhouse Gases, United States Government. ${ }^{23}$ This benefit was included in the NJCT and SCT.

I also estimate the economic value of the avoided $\mathrm{SO}_{2}$ and $\mathrm{NO}_{\mathrm{x}}$ emissions from the programs. While not included in the NJCT, the economic value of avoiding these emissions is substantial and reflected in the SCT. To estimate displaced $\mathrm{SO}_{2}$ and $\mathrm{NO}_{\mathrm{X}}$ emissions, I relied on the non-baseload tons per MWh estimate from the most recent eGrid data release (currently, eGRID2018 released in March 2020). ${ }^{24}$ I then de-escalated these rates over time based upon emissions rates from the most recent EIA Annual Energy Outlook (currently, 2020) for the PJM/East region. ${ }^{25}$ The de-escalation is intended to reflect the likely shift away from fossil based generation towards less polluting generation sources. To estimate the avoided damages from $\mathrm{SO}_{2}$ and $\mathrm{NO}_{\mathrm{X}}$, I relied on the February 2018 Technical Support Document Estimating the Benefit per Ton of Reducing PM ${ }_{2.5}$ Precursors from 17 Sectors by the U.S. Environmental Protection Agency Office of Air

[^32]and Radiation Office of Air Quality Planning and Standards. ${ }^{26}$ This source was used and approved by the Board ${ }^{27}$ in the Evaluation of New Jersey Solicitation for ORECs for Offshore Wind Capacity Framework for Evaluation of Impacts. ${ }^{28}$

## 12. Economic Development Benefits

EE programs can be a powerful tool for local economic development and job creation. While cost effective EE programs provide many other benefits, including reduced utility system costs, improved health outcomes, and lower bills for program participants, the job creation and local economic growth benefits are critical as states begin to recover from the COVID-19 pandemic.

Economic benefits are created by EE programs in two significant ways. First, economic benefits are created through the direct implementation of the programs. Second, benefits are also created through the ripple effects on the economy of customer bills savings. EE programs create significant bill savings, which increase disposable income for residents and businesses. The spending of this increased disposable income stimulates the economy, providing ripple effects in many sectors of the economy.

I estimated the economic development benefits using IMPLAN, a widely used industry standard input/output model. IMPLAN and similar input output models have been presented to the Board numerous times, including instances by its own consultants and by

[^33]consultants to Rate Counsel. IMPLAN is also one of the input output models suggested by the Board for evaluation of offshore wind investments. Finally, input/output modeling is required under the Offshore Wind Economic Development Act (also known as OWEDA) for offshore wind projects submitting for ORECs. ${ }^{29}$

I estimated the economic impacts by imputing the projected program spending and bill savings into IMPLAN. For program spending, I used a program by program approach to break out materials and labor, mapping spending into specific industries within IMPLAN. For bill savings, I mapped the increased disposable income to households by income level and to relevant commercial industries. Finally, to capture the negative economic impacts of higher rates and bills from the cost recovery associated with the programs, I offset the increased disposable income by the projected increase in bills driven by program costs. Collectively, these three steps provide a comprehensive estimate of economic impacts and job creation.

## 13. Non-Energy and Low-Income Adders

I applied a 5\% adder to avoided energy benefits to address non-energy benefits. I also applied a $10 \%$ adder to avoided energy benefits to address low-income non-energy benefits. The low-income adder was in addition to the 5\% non-energy benefit adder. Both adders are consistent with the prescribed method in the NJCT guidance document. ${ }^{30}$

[^34]
## Q23. Please describe the Program Costs listed in Table 1 above.

A23. The program costs include:

## 1. Incremental Costs

The incremental cost category captures the incremental cost of participating in the programs. This cost is calculated based upon the difference between the efficient measure costs assumed to install EE technologies and processes and the base measure cost assumed that a participant would otherwise pay without access to the proposed program.

## 2. Participant Costs

The participant cost category captures the incremental cost of participating in the programs paid by participants. This category includes both incremental costs paid by participants for the non-subsidized portion of EE costs, as well as loan repayments for programs offering financing.

## 3. Program Administration Costs

The program administration cost category captures the cost of administering the EE programs by ACE. These include costs for marketing, outside services, utility administration, inspections and quality control, and evaluation. These costs were developed based on ACE's previous experience delivering similar programs and guidance from the Board in the June 10 and August 24 orders.

## 4. Customer Rebate and Incentives Cost

The customer rebate and incentive cost category captures the direct rebate incentives provided to participants of the programs. These costs were developing through a coordinated approach with other New Jersey utilities, but are also based on existing programs in New Jersey and other jurisdictions for similar measures.

## 5. Utility Lost Revenues

An associated cost is the reallocated distribution costs category which captures the value of any distribution costs being avoided by participants that must be collected from the balance of ratepayers. These are not direct program costs and represent the transfer between existing ratepayer subsectors. This cost is also known as lost utility costs or lost revenues.

Utility lost revenues were calculated based upon the individual rate charges which currently contribute to supporting distribution costs. In addition, the utility lost revenues also include tariff surcharges and riders which do not contribute to distribution costs but would likely be reallocated to ratepayers at large. Utility lost revenues do not include any supply-related costs, as New Jersey's electric and natural gas utilities are deregulated, and avoided supply costs resulting from EE are not borne by ratepayers.

## Q24. What assumptions did you use to estimate measure level energy savings?

A24. My primary source to estimate measure level savings is the New Jersey Board of Public Utilities Protocols to Measure Resource Savings FY2020 ("Protocols"). ${ }^{31}$ I used the Protocols for the majority of measures, but when estimating savings for measures not covered in the Protocols, I relied on other regional technical reference manuals to estimate savings. These references included, but are not limited to, the Mid-Atlantic Technical

[^35]Reference Manual, ${ }^{32}$ Massachusetts Technical Reference Manual, ${ }^{33}$ and the New York Technical Reference Manual. ${ }^{34}$

Q25. Were the costs and benefits evaluated on a nominal or present value basis?
A25. For the purposes of each of the CBA tests, all costs and benefits were evaluated on a present value basis. The NJCT and SCT both relied on a $3 \%$ societal discount rate as prescribed by the Board in the August 24 Order. ${ }^{35}$ The TRC, PCT, PAC, and RIM tests relied on the ACE weighted average cost of capital of $6.83 \%$ to discount costs and benefits.

## Q26. What net to gross assumption did you make in conducting the cost benefit analysis?

A26. Consistent with Board guidance, I used a 1.0 net-to-gross factor for all programs and measures. ${ }^{36}$ This factor accounts for freeridership and spillover.

## V. CONCLUSIONS

Q27. Please summarize your testimony and recommendations to the Board.
A27. The ACE 2021-2023 Energy Efficiency Program Plan is a cost-effective portfolio of EE programs that achieves the State policy goals of the Board. The programs provide energy savings opportunities to all customers in the ACE service territory and ensure that LMI customers have equal opportunity to realize program benefits. The portfolio, puts

[^36]ACE on a trajectory to meet the program year five energy savings target mandated in the Clean Energy Act.

The CBA shows that the ACE program portfolio is cost effective under the New Jersey Cost Test with a cost benefit ratio of 3.78 and net benefits of $\$ 276$ million. These results indicate that the programs will provide significant benefits to all ACE customers, while improving environmental quality and stimulating economic development. I recommend the Board approve the ACE program portfolio as proposed.

Q28. Does this conclude your testimony?
A28. Yes.

## Schedule (BJB)-1

Brendon Baatz has nearly ten years of experience working directly on issues related to the electric and gas utility industry. His primary areas of expertise include electric cost of service and rate design, energy efficiency program design, energy efficiency policy, cost benefit analysis, utility regulatory strategy, stakeholder engagement, integrated resource planning, electric vehicle policy, and renewable energy technology and policy.

Mr. Baatz is an internationally recognized expert in rate design and energy efficiency policy. He has published peer reviewed papers and spoken on a variety of topics at trade events and conferences. Mr. Baatz is also a sought-after expert witness in litigated cases before regulatory commissions. He has appeared before commissions in Arizona, Colorado, Indiana, Maryland, New Jersey, New York, Oklahoma, Pennsylvania, and Washington D.C.

## Professional Experience

Gabel Associates Inc.
Vice President
Highland Park, NJ

- Support and advise clients on a variety of energy and regulatory issues including retail and wholesale electric rate design, energy efficiency policy and program design, cost benefit analysis, resource planning, and renewable energy project development.
- Lead consultant to the solar industry in New York Reforming the Energy Vision (REV) regulatory process on rate design for mass market customers.
- Provide ongoing consulting services to multiple gas and electric utilities on energy efficiency program design, cost benefit analysis, avoided cost development, strategic guidance, and program delivery in New Jersey.
- Advise various wholesale energy market clients, including power plant project developers and operators on regulatory issues such as retail ratemaking, wholesale ratemaking, RTO governance, FERC rulemakings, and other relevant issues.
- Provide technical expert testimony for various clients in regulatory matters before state energy commissions. Have testified in Arizona, Colorado, Indiana, Maryland, New Jersey, New York, Oklahoma, Pennsylvania, and Washington D.C

American Council for an Energy-Efficient Economy
Washington, D.C.
Senior Manager, Utilities Program
2014-2018

- Oversaw and coordinated ACEEE's efforts related to utility sector energy efficiency programs. Served as project manager and lead author for research projects involving utility sector energy efficiency programs, business models, best practices, rate design, and other topics.
- Provided technical assistance for utilities and other energy efficiency implementation partners such as state government agencies on a variety of regulatory policy and best practice program topics.
- Filed testimony and formal comments before state regulatory commissions on issues related to energy efficiency programs, integrated resource planning, rate design, and other issues related to the best practices and policies for implementing energy efficiency.
- Served as a technical expert in litigated cases before the Federal Energy Regulatory Commission on behalf of the FERC trial staff. Issues examined included: wholesale energy rates, transmission rates, Open Access Transmission Tariff interpretation, transmission capacity rights, cost allocation for various customer classes, formula rate mechanics and protocols, electric cost of service, interruptible load, rate design, and regional transmission organization functionality and governance.

Maryland Public Service Commission Baltimore, MD
Energy Analyst
2012-2013

- Reviewed and analyzed utility filings for EmPOWER Maryland statewide energy efficiency, conservation, and demand response programs. Presented results of research before the Commission. Worked closely with the Agency energy efficiency evaluation contractor to develop evaluation policies that reduced costs for Maryland ratepayers while ensuring integrity of the evaluation process.

Indiana Office of Utility Consumer Counselor
Indianapolis, IN
Utility Analyst
2011-2012

- Served as a technical expert witness in utility cases before the Indiana Utility Regulatory Commission on behalf of utility ratepayers in the State of Indiana. Developed agency position through analyses of relevant utility applications, petitions, testimony, schedules, and exhibits. Served as agency representative in collaborative demand side management oversight boards for electric and gas utilities.


## Education

Master of Public Affairs, Environmental Policy Analysis, Indiana University Bloomington, 2010 BS, Political Science and Sociology, Arizona State University, 2007

## Selected Research Publications

B. Baatz, G. Relf, and S. Nowak. 2018. The Role of Energy Efficiency in a Distributed Energy Future. The Electricity Journal, Vol. 31, Issue 10. doi.org/10.1016/j.tej.2018.11.004.
B. Baatz, J. Barrett, and B. Stickles. 2018. Estimating the Value of Energy Efficiency to Reduce Wholesale Energy Price Volatility. Washington, DC: ACEEE. aceee.org/research-report/u1803.
B. Baatz, G. Relf, and M. Kelly. 2017. Consequences of Large Customer Opt Out: An Ohio Example. The Electricity Journal, Vol. 30, Issue 9. doi.org/10.1016/j.tej.2017.10.002.
B. Baatz. 2017. Rate Design Matters: The Intersection of Residential Rate Design and Energy Efficiency. Washington, DC: ACEEE. aceee.org/research-report/u1703.
B. Baatz and J. Barrett. 2017. Maryland Benefits: Examining the Results of EmPOWER Maryland through 2015. Washington, DC: ACEEE. aceee.org/research-report/u1701.
B. Baatz and A. Gilleo. 2016. Big Savers: Experiences and Recent History of Program Administrators Achieving High Levels of Electric Savings. The Electricity Journal, Vol. 29, Issue 8. doi.org/10.1016/j.tej.2016.09.009.
B. Baatz. 2015. Everyone Benefits: Practices and Recommendations for Utility System Benefits of Energy Efficiency. Washington, DC: ACEEE. aceee.org/everyone-benefits-practices-andrecommendations.
S. Nowak, B. Baatz, A. Gilleo, M. Kushler, M. Molina, and D. York. 2015. Beyond Carrots for Utilities: A National Review of Performance Incentives for Energy Efficiency.
Washington, DC: ACEEE. aceee.org/beyond-carrots-utilities-national-review.

## Selected Expert Witness Regulatory Cases

Elizabethtown Gas; New Jersey Board of Public Utilities; July 31,2020 (Docket No. GR20070503).
Client: Elizabethtown Gas. Issues: cost benefit analysis for energy efficiency true up filing.
Tucson Electric Power Company; Arizona Corporate Commission (Docket No. E- 01933A-190028); October 11, 2019. Client: Southwest Energy Efficiency Partnerships Issues: performancebased ratemaking, energy efficiency program cost recovery, time of use rate design, electric vehicle rate design.

Black Hills Colorado Electric; Public Utilities Commission of Colorado (Proceeding No. 18A0676E), January 22, 2019. Client: Pueblo County, Colorado. Issue: time of use pilot proposal, low income bill analysis.

Oklahoma Gas and Electric Company; Oklahoma Corporate Commission (Cause No. PUD 201800140); April 22, 2019. Client: Oklahoma Energy Results. Issues: prudence of environmental cost recovery for aged coal units, integrated resource planning assessment.

Lancaster Solid Waste Management Authority; Federal Energy Regulatory Commission (Docket No. ER19-342); November 14, 2018. Client: Lancaster Solid Waste Management Authority. Issue: reactive power ratemaking.

Elizabethtown Gas; New Jersey Board of Public Utilities (Docket No. GR18080860); August 8, 2018. Client: Elizabethtown Gas. Issues: cost benefit analysis for energy efficiency true up filing.

Duquesne Light Company; Pennsylvania Public Utility Commission (Docket R-2018-3000124); June 25, 2018. Client: Keystone Energy Efficiency Alliance, Natural Resources Defense Council, and Clean Air Council. Issues: submetering for multifamily buildings, time of use rates, rate design.

Tucson Electric Power Company; Arizona Corporate Commission (Docket No. E- 01933A-150322); June 24, 2016. Client: Southwest Energy Efficiency Partnerships Issues: rate design, prepaid electricity.

PECO Electric Company; Pennsylvania Public Utility Commission (Docket R-2015-2468981); June 23, 2015. Client: Keystone Energy Efficiency Alliance, Natural Resources Defense Council, and Clean Air Council. Issues: rate design, revenue decoupling.

PPL Electric Corporation; Pennsylvania Public Utility Commission (Docket R-2015-2469275); June 23, 2015. Client: Keystone Energy Efficiency Alliance, Natural Resources Defense Council, and Clean Air Council. Issues: rate design, revenue decoupling.

Northern Indiana Public Service Company; Indiana Utility Regulatory Commission (Cause 44012); October 20, 2011. Representing Indiana Office of Utility Consumer Counselor. Issues: environmental control upgrades, alternate scenario economic analysis.

Indianapolis Power and Light Company; Indiana Utility Regulatory Commission (Cause 43623 DSM-5); April 26, 2012. Representing Indiana Office of Utility Consumer Counselor. Issue: energy efficiency performance incentive reconciliation.

Indianapolis Power and Light Company; Indiana Utility Regulatory Commission (Cause 44018); August 22, 2011. Representing Indiana Office of Utility Consumer Counselor. Issue: renewable energy feed in tariff design.

Indiana Michigan Power Company; Indiana Utility Regulatory Commission (Cause 44034); August 12, 2011. Representing Indiana Office of Utility Consumer Counselor. Issue: renewable energy credit benefit allocation.

Indiana Gas Company, Inc. and Indiana Gas and Electric Company; Indiana Utility Regulatory Commission (Cause 44019); May 20, 2011. Representing Indiana Office of Utility Consumer Counselor. Issue: revenue decoupling.

## Schedule (BJB)-2

# Atlantic City Electric Company Energy Efficiency Program Plan 

Prepared by:
Gabel Associates, Inc.
with direction by Atlantic City Electric Company


An Exelon Company

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## 1.INTRODUCTION

This Energy Efficiency Program Plan was developed in support of Atlantic City Electric Company's effort to promote increased access to and installation of energy efficiency and conservation measures within its electric service territory. The plan represents the current expectations for administration and implementation of the Program and is subject to change.

Atlantic City Electric Company ("ACE") is an electric utility distribution company that serves over 562,100 customers in the southern third of New Jersey. First incorporated in 1924, ACE's service territory spreads over 2,800 square miles in Atlantic, Burlington, Camden, Cape May, Cumberland, Gloucester, Ocean, and Salem Counties. The following figure displays ACE's service territory:

Figure 1: ACE Service Territory


Atlantic City Electric, as part of the Exelon family, remains committed to its core environmental, social and governance principles, which inform the Company's approach to design and delivery of its energy efficiency programs.

## Commitment to Diversity and Inclusion

The Company is committed to its energy efficiency programs supporting and using diverse businesses to provide program services to customers. In addition, the Company is enhancing its

Workforce Development Program to expand training and job opportunities in the energy and energy efficiency space, growing a pipeline of qualified employees to help meet the state's clean energy goals. ACE's energy efficiency program portfolio is expected to create 6,062 job-years directly related to program administration and implementation, and indirectly related to businesses’ ability to hire as a result of expanded operations.

## Commitment to Affordability and Equity

Atlantic City Electric currently offers two energy efficiency programs aimed at helping low- to moderate-income customers reduce their energy use and energy costs. The Quick Home Energy Check-up ("QHEC") Program focuses on offering energy efficiency services to customers in those ZIP Codes with a high penetration of low- to moderate-income ("LMI") households. During a QHEC audit, customers are educated on energy-saving adjustments they can make in their home, and products such as LED light bulbs, water saving measures, smart strips and ENERGY STAR ${ }^{\circledR}$ smart thermostats are installed during the Check-up. The Program has conducted 12,870 QHECs since its launch in 2018.

ACE, along with other New Jersey utilities, also participates in the Comfort Partners Program. This Program provides income-eligible customers with energy efficiency items including light emitting diode ("LED") light bulbs, insulation and energy efficient refrigerators. Since 2010, the Comfort Partners Program has served approximately 5,900 Atlantic City Electric customers.

Furthering its commitment to reaching LMI communities, in this first program cycle, ACE is proposing initiatives such as providing energy efficiency kits to local foodbanks and non-profit organizations and at energy assistance outreach events to reach low- to moderate-income customers. The Company is also proposing a Moderate-Income Weatherization Program which provides an opportunity for income-eligible customers to receive no-cost energy efficiency measures and upgrades.

## Commitment to the New Jersey Global Warming Response Act of 2007

Atlantic City Electric continues to support New Jersey’s Global Warming Response Act of 2007 that requires New Jersey to reduce GHG by 80 percent from 2006 levels by 2050. The Company recognizes that reducing energy consumption in both the residential and commercial sectors is an important piece of the State reaching this goal. To that end, ACE's portfolio of programs is expected to save customers 2.293 million megawatt-hours ("MWhs") of electricity over the lifetime of the measures and reduce carbon dioxide emissions by 1.462 million tons.

## Commitment to New Jersey

ACE leverages its status as an Exelon Company to bring best-in-class utility service and programs to its vast array of residential, commercial, and industrial customers. Presently, ACE offers two programs to its residential customers: the QHEC and a Behavior Program, which provides tips via a Home Energy Report and feedback on how to reduce electricity usage.

ACE is proposing to substantially increase the number of program offerings available to its customer base, as well as expand into the commercial and industrial sectors with a suite of programs that will help businesses reduce costs and save energy. The details of these expansions are provided herein and are consistent with the New Jersey Energy Master Plan ${ }^{1}$ ("EMP"), the New Jersey Global Warming Response Act ${ }^{2}$ ("GWRA"), the Act Concerning the Reduction of Greenhouse Gas Emissions ${ }^{3}$ ("RGGI law"), and the Clean Energy Act ${ }^{4}$ ("CEA") of 2018.

The portfolio described herein is designed to cost-effectively meet the targets of the Clean Energy Act and the Order Directing the Utilities to Establish Energy Efficiency and Peak Demand Reduction Programs, ${ }^{5}$ as well as satisfy all applicable Quantitative Performance Indicators. However, the overarching goal is to ultimately save customers money, reduce emissions and improve the environment, and create clean, sustainable jobs in New Jersey. To that end, ACE's portfolio of programs will provide $\$ 65,691,066$ of incentives for energy efficiency upgrades for all ACE customers and is expected to save customers $\$ 552$ million $^{6}$ on their electric and gas bills and contribute $\$ 504$ million to New Jersey’s Gross Domestic Product.

[^37]
## 2.PORTFOLIO OVERVIEW

The ACE energy efficiency program portfolio covers the three-year period of July 2021 through June 2024. The portfolio is comprised of a wide range of programs that reach all customer segments in the ACE service territory. The program offerings include Core programs, which are consistent program offerings across all utilities in New Jersey, and utility-led initiatives, which are programs specific to the ACE service territory. The Core offerings will continue similar program designs as the current Office of Clean Energy ("OCE") programs, with some modifications. The utility-led initiatives include programs that offer additional opportunities to customers to save energy, building on existing customer relationships and prior programs, both in New Jersey and elsewhere.

### 2.1. Savings Targets

The Clean Energy Act requires electric utilities in New Jersey to achieve energy-savings of 2.0\% of retail sales by the fifth year of program implementation. The New Jersey Board of Public Utilities set annual targets for program years ("PY") leading up to the fifth year. There is no Board Ordered target in year one, yet ACE set its own PY1 target of $0.38 \%$ of retail sales to ramp up programs to meet the second-year target. The June $10^{\text {th }}$ Board Order target is $0.74 \%$ in PY2, and $0.97 \%$ in PY3. Table 1 below shows the estimated savings targets, which the ACE energy efficiency program portfolio is designed to meet.

Table 1: ACE Savings Targets

| Program <br> Year | Board- <br> Ordered <br> Target <br> (\%) | ACE's <br> Target <br> (MWh) |
| :---: | :---: | :---: |
| PY1 | $0.38 \%$ | 33,017 |
| PY2 | $0.74 \%$ | 62,552 |
| PY3 | $0.97 \%$ | 81,490 |

The chart below shows the EE Plan's projected savings in each year of the first three-year program cycle. The EE Plan alone does not meet targets in PY2, but by including existing programs in the total calculated savings, the programs exceed goal. More discussion about the merger-commitment programs and their relationship to the proposed EE program portfolio is in section 2.3 Allocation of Costs and Savings Associated with Merger and EE Plan Programs.

Figure 2 shows the projected energy savings against the targets for the first three years.
Figure 2. ACE EE Plan Projected First Year Electric Savings


### 2.2. Portfolio Design

As discussed above, the ACE portfolio of EE programs is split between Core and Utility-Led initiatives. Within these designations, there are a number of programs designed to hit each demographic of ACE's customers and economy. The following summarizes each of the programs being proposed by ACE within the EE Portfolio. These programs provide customers with a variety of participation options as to promote ease of participation and customer satisfaction.

Table 2. ACE Proposed Program Portfolio

| Sector | Program | Subprogram |
| :---: | :---: | :---: |
| Residential | Behavior | Home Energy Reports |
|  | Efficient Products | HVAC |
|  |  | Online Marketplace |
|  |  | Appliance Rebates |
|  |  | Appliance Recycling |
|  | Existing Homes | Home Performance with ENERGY STAR |
|  |  | Quick Home Energy Check Up |
|  |  | Moderate-Income Weatherization |
| Multi-Family | Multi-Family | Multi-Family |
| Commercial and Industrial | Small Business Direct Install | N/A |
|  | Energy Solutions for Business | Prescriptive/Custom |
|  |  | Energy Management |
|  |  | Engineered Solutions |

### 2.3 Allocation of Costs and Savings Associated with Merger and EE Plan Programs

In an Order dated March 6, 2015, the New Jersey Board of Public Utilities (the "Board" or "BPU") approved a Stipulation of Settlement" ("Stipulation") setting the terms and conditions for the merger between Exelon Corporation and Pepco Holdings, including the implementation of energy efficiency programs. The programs, QHEC and Behavior Program, have been offered to residential customers by ACE since 2018. The energy efficiency portfolio budget of $\$ 98.6$ million that is requested in this filing is incremental to the existing energy efficiency programs.

The QHEC and Behavior Program outlined in this plan are a continuation of the merger-funded programs, and they will be offered through the entire three-year program cycle. Therefore, this plan only accounts for the costs and savings associated with the continuation of these programs once

[^38]the merger commitment funds have been exhausted. The merger funds for the QHEC program are forecast to be exhausted in PY1, and for the Behavior program in PY3.

The tables below explain the delineation of savings realized from merger funds and from EE Program Plan funds. In order to meet the PY2 and PY3 savings targets established by the June $10^{\text {th }}$ Board Order, the QHEC program will need the merger-funded savings of 3,933 MWh PY1.

Similarly, the Behavior Program will need the merger-funded savings of 12,783 MWh in PY1, 13,388 MWh in PY2, and 5,289 MWh in PY3.

Table 3. ACE Merger and Program Plan Savings for QHEC and Behavior Programs

| Merger and Program Plan Savings (MWh) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Program | Funding Allocation | PY1 | PY2 | PY3 | Total |
| QHEC | Merger | 3,933 | 0 | 0 | 3,933 |
|  | EE Program Plan | 273 | 6,835 | 9,464 | 16,572 |
|  | Program Cycle Total | 4,206 | 6,835 | 9,464 | 20,505 |
|  |  |  |  |  |  |
| Behavior | Merger | 12,783 | 13,388 | 5,289 | 31,460 |
|  | EE Program Plan | 0 | 0 | 7,998 | 7,998 |
|  | Program Cycle Total | 12,783 | 13,388 | 13,287 | 39,458 |

This portfolio approach will save customers millions of dollars by leveraging existing programs, striking a balance to slowly ramp up program spending during the economic recovery period while still achieving policy goals.

As discussed above in section 2.1 Savings Targets, above, and as demonstrated in Figure 2, above, the EE plan's energy-saving projections alone do not meet the target in PY2. This is due to the exclusion of the energy savings associated with the Exelon merger programs. However, as the June $10^{\text {th }}$ Board Order states, "...in calculating net energy use reductions and assessing compliance with QPIs, utilities be permitted to apply energy savings from any other EE or PDR programs in their territory, as well as any other programs that reduce electricity or natural gas by customers and can reasonably be quantified based on accepted standards, ..." Therefore, the Company plans to count the savings from these merger-commitment programs, QHEC and Behavior Program, towards its PY2 and PY3 goals as noted in the tables above. The addition of the merger program savings and the EE program plan savings achieve ACE’s Board-Ordered energy reduction targets in PY2 and PY3 as demonstrated in Figure 3, below.

Figure 3. Projected Savings (EE Plan and Merger Programs) Against Target by Program Year


## 3.PROGRAM DESCRIPTIONS

The Utilities will administer the following programs to engage customers and encourage the pursuit of energy-efficient solutions from single transactions to comprehensive upgrades. The Utilities will strive to provide customized guidance wherever possible and provide supporting resources to make energy-efficient retrofits more accessible for all customers.
Programs include:

### 3.1. Core Subprograms

Residential Efficient Products: This program provides incentives and rebates for energy-efficient products, including those offered at retail and through the marketplace, appliances, HVAC equipment, and appliance recycling.

Residential Existing Homes: Home Performance with ENERGY STAR: This subprogram provides incentives to encourage customers to pursue comprehensive upgrades to their home.

Multi-Family Program: This program provides maximum customer flexibility to meet the specific needs of each customer. A structured screening review is used to determine the customer's needs and develop a tailored energy efficiency solution.

Small Business Direct Install: This subprogram provides a no-cost audit and direct-install measures, and incentives for comprehensive retrofit projects. Non-residential customers can also receive financing for project costs.

Energy Solutions for Business: Prescriptive and Custom: This subprogram provides prescriptive and custom measures for lighting, HVAC, controls, and other C\&I equipment.

### 3.1.1. Efficient Products

This program will promote the installation of ENERGY STAR and other high-efficiency electric and natural gas equipment by residential customers. The program will offer a broad range of energy-efficient equipment and appliances through a variety of channels retail channels, including, but not limited to, an online marketplace, downstream rebates to customers, up-front rebates, reduced point of sale costs, and midstream or upstream components. The Company will also collaborate with local foodbanks and non-profit organizations to distribute kits and products to customers in need. The program will provide incentives for energy-efficient lighting, appliances, electronics, and heating and cooling equipment, as well as other products (e.g., smart thermostats, water saving measures, weatherization items, and prepackaged kits). The program may include customer opportunities at no up-front costs to engage and introduce customers to energy-savings opportunities and achieve energy-savings. Up-front rebates will also be offered to reduce initial costs on some purchases, and on-bill repayment or access to financing with similar terms will be available to further reduce first cost barriers for select products. The program is designed to provide easy and cost-effective access to energy-efficient measures through customers' preferred channels, and provide a means to encourage customers to take the first steps toward energy efficiency.

The program is designed to:

- Provide incentives for products that reduce energy use in the home and information about other programs that encourage the installation of high efficiency equipment, such as lighting, HVAC units, other heating and cooling equipment, electronics and appliances.
- Provide midstream incentives to retailers and/or distributors to increase sales of ENERGY STAR or other energy-efficient products.
- Continue to support and/or provide downstream approaches for certain measures to ensure the market is properly supported.
- Provide a marketing mechanism for retailers and high efficiency product suppliers to promote energy-efficient equipment and products to end users.
- Ensure the participation process is clear, easy to understand and simple for the customer and contractor.
- Provide online or other channels for customers that include, but are not limited to, online and in-store eligibility options to acquire select ENERGY STAR products, as well as low and moderately priced energy-saving products.
- Recognize unique barriers that low- and moderate-income customers face and employ strategies to address those barriers, including no-cost measures and/or enhanced incentives where appropriate.
- Utilize energy efficiency kits to introduce and promote energy efficiency technologies that can be easily installed in the home. The kits will serve as a gateway to other programs by including energy efficiency and conservation educational materials and promotional materials for other program opportunities, including the utility, Comfort Partners and NJCEP programs.
- Provide energy efficiency kits to local foodbank and non-profit organizations and at energy assistance outreach events to reach low- to moderate-income customers, to schools to promote energy efficiency education in classrooms, to new Atlantic City Electric
customers and other customers upon request, and within utility marketplaces to support customer engagement.

This program will increase adoption of energy-efficient equipment and products by harnessing the unique utility customer relationship to positively impact the entire sales process surrounding efficient equipment, from education and awareness of customers, engagement with trade ally contractors and equipment distributors and retailers, to on-bill repayment or access to financing with similar terms for select products.

The utilities will use their brand and customer outreach infrastructure to increase the availability, awareness, and customer uptake of energy-efficient products. On-bill repayments or access to financing with similar terms will be available to customers to cover the remaining cost (after applying the rebate discount) for the balance of the efficient product cost for select products and services.

Utility staff and/or a third-party implementation contractor(s) will be selected to assist with the administration, oversight, and delivery of the program. Administration activities include launching a statewide online marketplace with utility-specific interfaces; marketing the programs; maintaining and refining the list of eligible measures; validating customer eligibility and processing incentives; and conducting outreach to and securing partnerships with retailers, wholesalers, distributors, manufacturers and trade allies to assure all customers are able to easily purchase energy-efficient products and equipment through the program. Customer engagement and sales channels may include:

- Post Purchase (Downstream) Rebates: Rebates will be made available to customers after they have made their purchase. Applications for rebates may be available online or in stores, and customers can opt to submit either electronically or mail-in a hard copy with proof-of-purchase.
- Online Marketplace: This online marketplace is an easy to use website for the purchase of efficient products and services. Participants will be able to browse energy-efficient equipment and appliances and get instant rebates.
- Point-of-Sale Rebates: Prescriptive rebates will be made available at the point of sale for selected products. The utilities will also explore the viability of using a digital, smartphonebased application platform, to enable customers to purchase efficient equipment at traditional consumer retail outlets and instantly redeem rebates at point-of-sale in both physical stores and online. Allowing easy access to rebates encourages customers to purchase qualifying efficient products.
- Appliance Recycling: Rebates will be provided to customers for recycling qualifying, inefficient, operating appliances. Offering an incentive for the drop off or pick-up and removal of an appliance prevents the appliance from being maintained as a second unit or transferred to another customer.
- Midstream or Upstream Rebates: The utilities will pursue a midstream or upstream rebate component to encourage purchase of certain efficient equipment. The utilities will work with retail partners (such as Home Depot, Lowes, etc.), distributors or manufacturers to assure that measures are available throughout the state. Midstream or upstream rebates encourage market transformation and wider availability of efficient equipment. Efficient
products that are rebated via a midstream or upstream approach may be passed on or discounted to the customer at the retail level. Utilities may also offer downstream rebate programs to ensure customers and trade allies are properly supported.
- Trade Allies: The utilities will establish a network of trade allies to promote certain components of the program with a consistent experience to the customer where applicable. The trade ally network will consist of qualified installation contractors, plumbers, electricians, and other trade service professionals who meet all applicable statewide requirements for performing the respective service (e.g. HVAC license, insurance requirements). Trade allies will be able to leverage the program and offer customers rebates through their normal course of business.
- Community Partners: The utilities will partner with foodbanks and other community organizations serving customers in need to help reduce the energy burden of those customers with no-cost energy-efficient products, and to raise the awareness of other energy efficiency and energy assistance programs available to help.

By developing relationships with both program and trade allies, the program will develop a broad reach across the marketplace, and also solicit feedback from the marketplace to ensure incentives and measures are impacting the market as designed. Targeted program and trade allies may include:

- Efficient equipment retailers, distributors and manufacturers
- HVAC \& appliance contractors
- General contractors, plumbers, electricians, and other trade service professionals

Regardless of the delivery mechanism, the utilities will take steps to ensure customers are made aware of utility engagement in helping to off-set up-front costs of the efficient products.

## Target Market or Segment (MFR II.a.ii)

The target market for this program will be all electric and natural gas customers served by at least one investor-owned utility in New Jersey. The program is focused on promoting the sale and installation of efficient electric and natural gas equipment across all major residential end-use categories, and can be easily promoted to program allies, trade allies, and customers via straightforward prescriptive rebates. Technologies incentivized through this program include lighting, HVAC, other heating and cooling equipment, electronics, appliances, smart thermostats, water saving measures, weatherization items, pre-packaged kits, and other efficient products. The program will also promote the retirement, recycling, and replacement of old refrigerators, freezers, and other inefficient appliances.

The utilities may offer enhanced incentives for Low-to-Moderate income (LMI) customers (up to $400 \%$ of federal poverty level) for certain products to assure that the program reaches all customer types. Eligibility for these enhanced incentives can be determined based on screening an individual customer, however the utilities will also explore implementing automatic eligibility for enhanced incentives based upon a physical location (e.g. census tract, environmental justice community, Urban Enterprise Zone) to encourage more activity in LMI communities.

## Marketing Plan (MFR II.a.xiv)

The utilities will implement both multi-pronged direct and indirect marketing campaigns to promote this program. Customers will be exposed to broad-based energy efficiency awareness campaigns, web-based engagement and information, digital advertising, social media and hardcopy materials to promote awareness, as well as tie-ins with other programs. Retailers, wholesalers, distributors, manufacturers and trade allies will be contacted directly and through trade associations to develop networks and promote involvement in the program where applicable. The utilities will also look to leverage the behavior program for 'warm leads' into the program through both the home energy reports and online audit tool. In addition, the kits provided through this Program will include pamphlets and literature recommending customers visit utilities online portals and marketplace, further increasing engagement.

Targeting and promotion within this program will be enabled through intelligence gained through other residential programs or offerings, primarily Behavioral Home Energy Reports, Existing Homes, and other activity in the Efficient Products program. The utilities will explore opportunities to provide customized information to customers with prioritized action items, to maximize availability and uptake.

A combination of strategies will be used to train and support retailers, distributors and other program allies, including media advertising, outreach community forums, events, and direct outreach to customers. Marketing activities may include:

- Point-of-purchase displays and materials, joint advertising, coupons, and special "instant sales events"
- Public relations materials
- Brochures that describe the benefits and features of the program including application forms and processes. The brochures will be available for various public awareness events (community events, presentations, seminars etc.)
- Bill inserts, bill messages, email, Facebook, Twitter and other social media platforms, popup stores.
- Company website content providing program information resources, contact information, online application forms, online retail store and links to other relevant service and information resources
- Customer representatives trained to promote the program to their customers
- Presence at conferences and public events used to increase general awareness of the program and distribute program promotional materials

The primary market barriers that impact this program include:

- Initial Cost of Efficient Equipment: Relative to the market baseline, efficient equipment often carries a higher upfront cost but a lower lifetime operating cost. Customers often may not fully value the lifetime operating cost advantage of efficient equipment and, as a result, higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, incentives are provided to the customer to reduce the initial cost. On-bill repayment or access to financing with similar terms will also help mitigate the up-front cost barrier.
- Customer Awareness and Engagement: Eligible participants may be unaware of energyefficiency opportunities and programs because the segment has historically not been well served by traditional energy-efficiency programs. To address this barrier, this program was designed specifically to support the multi-family segment. The utilities will execute targeted outreach strategies to ensure that relevant customers are aware of program opportunities and consider energy efficiency in equipment investments and long-term planning. The program will also prepare and distribute successful case studies of prior participants and their experiences and energy savings. To increase awareness among customers with English as a second language, utilities will develop and provide outreach materials in Spanish. The utilities intend to be active participants in both the Equity and Marketing Working groups, and expect to address the need and cost for developing materials in a broader range of languages as part of those discussions.
- Landlord/Tenant Arrangements: Split incentives between landlord/tenants with respect to who pays for energy use vs. who owns the energy-using equipment challenge investment decisions. To address this barrier, the program will be marketed to both landlords and tenants to assure that those exposed to energy costs are able to participate in the program. Utilities may also provide technical and outreach assistance to property owners and managers in developing and marketing green properties to attract tenants.
- Sufficient Stocking and Availability of Efficient Products: The utilities will look for opportunities to develop and promote a midstream component for specific equipment to encourage high levels of participation via incenting midstream market actors and/or directly discounting the cost of the efficient equipment at the point of sale.

The utilities will seek to manage all barriers to program success through a commitment to applying best practices in program design, delivery, outreach, and marketing/advertising. The utilities established customer communication channels, data, and brand in the marketplace will all be leveraged to deliver best-practice programs that identify and confront market barriers on an ongoing basis. To the extent possible, the utilities will cross-promote programs to spread awareness of the range of efficiency opportunities proposed in this plan.

## Implementation Plan, Delivery Method and Contractor Roles (MFR II.a.v) (MFR II.a.viii) (MFR.II.c)

The utilities will administer this HPwES subprogram and may also choose to select a third-party implementation contractor to manage delivery of this subprogram.

The implementation contractor will be responsible for identifying and engaging retail and wholesale entities dealing in energy-efficient equipment, and will describe the program vision, identify eligible efficient products, define rebates, and outline ways to participate. Additionally, the utility and/or third-party implementation contractors will engage trade allies, including local HVAC, electrical, plumbing, and other contractors to educate them on program benefits and build a trade ally network which will reliably install energy-efficient equipment for participating customers. The utility and/or third-party implementation contractors will also monitor participation to assess the effectiveness of outreach efforts, incentive levels, delivery methods, and both program ally and trade ally availability to provide suggestions to assure that the program is continually providing customers with their needs. The utility and/or a third-party implementation
contractor will be responsible for the management of the online marketplace. The utilities will oversee the build-out of the online marketplace as well as the retail and Trade Ally network, which may be administered by third-party implementation contractors. The utility and/or third-party implementation contractors will also process the online instant rebates, verify eligibility of customers and manage the delivery of items purchased on the website.

To select qualified third-party implementation contractors, the utilities will prioritize criteria including but not limited to:

- Experience delivering similar programs or initiatives
- Resources and marketing strength
- Cost
- The amount of business placed with minority, women, veteran and service-disabled veteran owned businesses ("MWVBEs").

By allowing participants to select a trade ally they are comfortable with for select products, the program reduces barriers to entry related to knowledge of energy efficiency, confidence in assessments, and measure installation. The utilities will perform customer satisfaction surveys and other quality assurance and quality control activities to monitor, ensure program performance and verify quality standards are met.

## Existing and Proposed Incentives Ranges (MFR II.a.iii) (MFR II.a.iv)

The utilities propose to provide a range of incentives depending on the measure type, subject to changes based upon customer response and marketplace changes over the plan period. Incentives will vary depending on the specific product, the incremental cost of the high-efficiency technology, and the product maturity in the marketplace. Refer to Appendix A for the Rebate and Incentive Matrix for this program.

Incentives will be available in several ways and are adapted to the retail partner needs and market response. Strategies may include:

- Mail-in applications available from the retailer and the program website or directly from contractors
- Online rebate forms
- Point of Sale or In-store "Instant Reward" coupons that are redeemed in-store at the time of purchase.
- Special sale events in retail stores
- Manufacturer buy down to Retailer
- Midstream or Upstream incentives to retailers, distributors or manufacturers to encourage them to stock and promote efficient products or to provide product incentives at time of purchase
- Partnerships with community groups, schools, and/or non-profit organizations

Incentives may change based on market prices, as well as manufacturer and distributor co-funding. Other incentive alternatives may be used as the market evolves and new and innovative customer, program ally and trade ally engagement opportunities become apparent.

In instances where incentives are not immediate, the utilities will complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements such as necessary field inspections (if required)

## Customer Financing Options (MFR II.a.vi)

Refer to Appendix C for the Customer Financing Options by Program.

## Customer Access to Current and Historic Energy Usage Data (MFR II.a.vii)

ACE customers will have access to extensive customer data and bill analysis tools through the MyAccount feature of online customer service. Up to one year of usage data is also available on customers' electric bills.

## Projected Participants (MFR II.a.ix) and Energy-savings (MFR II.a.x)

The table below summarizes the projected participation and savings associated with this program. All values are annual incremental totals, and do not incorporate savings achieved in prior years. Participation estimates are calculated as the sum of forecasted measure-level participation units, and each unit of participation is based on a measure-specific forecasted savings unit of measure. Savings estimates are based on projected participation during each year of the forecast period.

Table 3. Efficient Products Estimated Participation and Savings

| Metric | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Estimated Participants ${ }^{8}$ | 79,922 | 81,204 | 80,610 |
| Projected Net Annual Natural Gas Savings (therms) | 184,291 | 248,838 | 274,130 |
| Projected Net Lifetime Natural Gas Savings (therms) | 997,856 | $1,450,840$ | $1,609,406$ |
| Projected Net Lifetime Natural Gas Savings from <br> Qualifying Low-Income Customers (therms) | 0 | 0 | 0 |
| Projected Net Annual Electric Savings (kWh) | $9,236,964$ | $11,595,373$ | $13,495,924$ |
| Projected Net Lifetime Electric Savings (kWh) | $102,248,999$ | $125,125,027$ | $144,364,246$ |
| Projected Net Lifetime Electric Savings from Qualifying <br> Low-Income Customers (kWh) | 0 | 0 | 0 |
| Projected Net Annual Peak Demand Savings (kW) | 86 | 108 | 128 |
| Projected Net Lifetime Peak Demand Savings (kW) | 987 | 1,214 | 1,418 |

[^39]For customers in areas where gas and electric service territories overlap, the utilities will use the Statewide Coordinator to allocate costs and energy-savings for shared measures. Refer to Section 11 for a description of the role of the Statewide Coordinator.

## Program Budget (MFR II a.xi) (MFR II.a.xii)

The following table provides the subprogram budget broken down by the following categories: capital cost; utility administration; marketing; outside services; incentives (including rebates and low- or no- interest loans); inspections and quality control; and evaluation.

Table 4. Efficient Products Estimated Program Expenditures by Cost Category and Year (\$)

| Cost Category | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Capital Cost | $1,000,000$ | 250,000 | 250,000 |
| Utility Administration | 635,310 | 600,954 | 650,573 |
| Marketing | 258,444 | 279,977 | 287,583 |
| Outside Services | 573,676 | 700,121 | 753,603 |
| Incentives-rebates and other | $1,806,135$ | $2,325,577$ | $2,635,974$ |
| Incentives-financing | 267,831 | 441,905 | 519,314 |
| Inspections and Quality Control | 53,923 | 66,773 | 72,286 |
| Evaluation | 359,310 | 469,099 | 504,607 |
| Total | $\mathbf{4 , 9 5 4 , 6 3 0}$ | $5,134,406$ | $5,673,939$ |

### 3.1.2. Existing Homes: Home Performance with ENERGY STAR

Home Performance with ENERGY STAR ("HPwES") will provide a holistic approach for customers to explore and invest in the efficiency and comfort of their homes. All participants in this subprogram must have an initial energy audit performed directly by a qualified HPwES contractor or auditor. That audit will develop an energy efficiency action-plan that includes recommendations for upgrades and available incentives. To ensure the upgrades are accessible to customers, there will be financing available through either an On-Bill Repayment Program or access to financing with similar terms.

This subprogram is designed to review the entire status of a home, including equipment and envelope to achieve deeper energy-savings. The program will follow guidelines and qualifying criteria associated with the U.S. Environmental Protection Agency HPwES (HPwES) program subject to as-needed enhancements to maximize participation and cost-effective energy-savings opportunities. The utilities will also seek to increase the number of contractors certified to offer customers the U.S. Department of Energy Home Energy Score (HES) to help customers understand how HPwES improvements can improve the efficiency and comfort of their home.

## Target Market or Segment (MFR II.a.ii)

HPwES will be available to all single-family and single-family attached (1- to 4-unit properties) electric and/or natural gas customers served by at least one of the investor owned utilities in New Jersey. In the case of a single-family attached unit, the owner of the unit can participate individually in HPwES and does not require the agreement of other owners in the property. The Company will also offer a comprehensive Multifamily HPwES program for attached properties of three or more units. This program is described in greater detail below.

As noted, all customers will start with a comprehensive energy audit. Potential measures incentivized through this program include, but are not limited to, insulation, air sealing, smart thermostats, and HVAC. All HPwES projects must include air sealing and insulation.

## Marketing Plan (MFR II.a.xiv)

The utilities will utilize many marketing avenues to assure subprogram awareness and participation is maximized. These include traditional marketing avenues, such as web-based engagement and information, digital advertising, media advertising, and hard-copy materials to promote awareness among trade allies and customers. The utilities will also cross promote this subprogram to participants in other energy efficiency program offerings. Information garnered from other programs, such as the Residential Behavioral and Residential Efficient Products, could also be used to identify prime candidates for participation in this HPwES subprogram. For example, a review of usage data contained in Home Energy Reports from the Residential Behavioral Subprogram could allow the utilities to identify customers who are particularly susceptible to changes in weather and would be ideal candidates for an audit. Likewise, the Residential Efficient Products program could provide leads to customers interested in energy efficiency. Most importantly, the QHEC subprogram was specifically designed to educate, engage
and provide immediate energy-savings to customers, and identify strong leads for candidates that would benefit from participating in this HPwES program.

Consistent with current New Jersey HPwES program practices, the utilities may offer Cooperative Marketing funding to encourage contractors to promote the program.

The primary market barriers that impact this subprogram include:

- Initial Cost of Comprehensive Home Retrofits: Home retrofits are more expensive and involved than purchasing efficient equipment and therefore, require more participant investment and commitment. Customers must be willing and able to invest in more expensive energy efficiency projects. The utilities address this barrier by offering incentives and On-Bill Repayment Programs ("OBRP") or access to financing with similar terms.
- Traditional Credit Screening: Many customers interested in pursuing comprehensive projects may not be able to pass traditional credit screening (e.g. requirements for debt to equity ratio) despite having a proven track record for paying their utility bills on time. The utilities will explore solutions to help more customers access this incentive through either an OBRP approach or access to financing with similar terms that relies on a review of utility payment history and bankruptcy check to ensure customers who have a proven track record have the opportunity to participate or through innovative approaches.
- Customer Awareness and Engagement: Many customers are unaware of the "whole house" approach to energy efficiency or the fact that building science exists. The utilities will work to address this by:
o continuing to educate customers about the HPwES subprogram and how both the structure and equipment work together
o highlighting the extra training that participating contractors must have
o identifying how the shell measure improvements can improve their comfort within the home
o noting that an audit includes health and safety testing
o reinforcing that the investments in equipment and shell measures may increase the value of their home.
Additionally, to increase awareness among customers with English as a second language, utilities will develop and provide outreach materials in Spanish. The utilities intend to be active participants in both the Equity and Marketing Working groups, and expect to address the need and cost for developing materials in a broader range of languages as part of those discussions.
- Trade Ally Awareness and Training: To meet the participation goals, HPwES contractors must be available to undertake the work. The utilities will address this barrier by trying to recruit more HVAC contractors to secure the additional certification necessary to participate in this program, including pursuing initiatives that align with the Workforce Development Working Group strategies to include more local, underrepresented and disadvantaged workers.

The utilities will seek to manage all barriers to program success through a commitment to applying best practices in program design, delivery, outreach, and marketing/advertising. The utilities
established customer communication channels, data, and brand in the marketplace will all be leveraged to deliver best-practice programs that identify and confront market barriers on an ongoing basis.

## Implementation Plan, Delivery Method and Contractor Roles (MFR II.a.v) (MFR II.a.viii) (MFR.II.c)

The utilities will administer this HPwES subprogram and may also choose to select a third-party implementation contractor to manage delivery of this subprogram.

Utility staff and/or third-party implementation contractors will oversee all aspects of the subprogram, including training and engagement, QA/QC, and rebate processing. There will be a significant focus on developing, training, and growing a qualified trade ally network. This will include trade ally training sessions, workshops, and market development events to grow and develop the trade ally network, with a priority placed on encouraging them to integrate home efficiency performance into their business and become Building Performance Institute (BPI) certified contractors. Utility staff and/or third-party implementation contractors will maintain a close relationship with trade allies to ensure consistent subprogram delivery experience and high customer satisfaction. Utility staff and/or third-party implementation contractors will also take on the responsibility of providing an additional layer of customer support as needed and conducting selective verification of trade ally installation work.

Trade allies will consist of companies employing BPI-certified professionals to complete HPwES audits and energy-saving projects. In order to facilitate trade ally access to participants, utilities or the third-party implementation contractor will maintain a list of companies and professional services where customers can find local trade allies based on geography and other criteria.

Selection of third-party implementation contractors will prioritize criteria including but not limited to:

- Experience delivering similar subprograms or initiatives
- Knowledge of the current marketplace
- Ability to educate and train contractors
- Local presence
- Cost
- The amount of business placed with minority, women, veteran and service-disabled veteran owned businesses ("MWVBEs").

The utilities will encourage all participating contractors to also look for opportunities to promote measures from the Residential Efficient Products Subprogram, such as home appliances (e.g. clothes washers) to increase energy-savings and leverage those incentives.

## Existing and Proposed Incentives Ranges (MFR II.a.iii) (MFR II.a.iv)

The utilities will provide incentives to encourage customers to implement the measures recommended during their audit. Incentives will be calculated based on modeled savings through a sliding scale up to an overall project cap. Modeled savings will be based upon software that will
use consistent calculations across territories. As the utilities work to launch midstream incentives for HVAC measures through the EE Products program, there is a recognition that a baseline incentive may be provided when a participating contractor secures the equipment from a participating distributor or retailer. The utilities intend to adjust the calculation of the incentive when an incentive has already been provided through a midstream path. However, the utilities have a shared intention to have the value of an HVAC measure being installed through this program be higher than a standalone HVAC equipment installation to ensure that customers are encouraged to pursue comprehensive upgrades and to recognize additional energy-savings associated with improving the building shell.

Consistent with current practices for the New Jersey HPwES program, the utilities are proposing an incentive range for a Contractor Production incentive and separate scale for incentives for multifamily properties.

Refer to Appendix A for the Rebate and Incentive Matrix for this program.
The utilities and/or third-party implementation contractors will complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements such as necessary field inspections (if required).

## Customer Financing Options (MFR II.a.vi)

Refer to Appendix C for the Customer Financing Options by Program.

## Customer Access to Current and Historic Energy Usage Data (MFR II.a.vii)

ACE customers will have access to extensive customer data and bill analysis tools through the MyAccount feature of online customer service. Up to one year of usage data is also available on customers' electric bills.

## Projected Participants (MFR II.a.ix) and Energy-savings (MFR II.a.x)

The table below summarizes the projected participation and savings associated with this subprogram. All values are annual incremental totals, and do not incorporate savings achieved in prior years. Savings estimates are based on projected participation during each year of the forecast period.

Table 5. HPwES Estimated Participation and Savings

| Metric | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Estimated Participants | 190 | 281 | 360 |
| Projected Net Annual Natural Gas Savings (therms) | 13,493 | 19,955 | 25,566 |
| Projected Net Lifetime Natural Gas Savings (therms) | 229,380 | 339,241 | 434,615 |


| Projected Net Lifetime Natural Gas Savings from <br> Qualifying Low-Income Customers (therms) | 0 | 0 | 0 |
| :--- | ---: | ---: | ---: |
| Projected Net Annual Electric Savings (kWh) | 423,887 | 626,906 | 803,154 |
| Projected Net Lifetime Electric Savings (kWh) | $7,206,075$ | $10,657,406$ | $13,653,616$ |
| Projected Net Lifetime Electric Savings from Qualifying <br> Low-Income Customers (kWh) | 0 | 0 | 0 |
| Projected Net Annual Peak Demand Savings (kW) | 4 | 6 | 8 |
| Projected Net Lifetime Peak Demand Savings (kW) | 74 | 109 | 140 |

* Represents all savings from lead utility projects

For customers in areas where gas and electric service territories overlap, the utilities will use the Program Coordinator to allocate costs and energy-savings. Refer to Section 10 for a description of the role of the Program Coordinator.

## Program Budget (MFR II a.xi) (MFR II.a.xii)

The following table provides the subprogram budget broken down by the following categories: capital cost; utility administration; marketing; outside services; incentives (including rebates and low- or no- interest loans); inspections and quality control; and evaluation.

Table 6. HPwES Estimated Program Expenditures by Cost Category and Year (\$)

| Cost Category | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Capital Cost | 0 | 0 | 0 |
| Utility Administration | 35,090 | 45,938 | 51,220 |
| Marketing | 225,880 | 266,854 | 289,015 |
| Outside Services | 310,136 | 423,968 | 498,697 |
| Incentives-rebates and other | $1,235,000$ | $1,826,500$ | $2,340,000$ |
| Incentives-financing | 302,270 | 447,041 | 572,722 |
| Inspections and Quality Control | 3,899 | 5,104 | 5,691 |
| Evaluation | 22,654 | 33,504 | 42,923 |
| Total | $2,134,929$ | $\mathbf{3 , 0 4 8 , 9 0 9}$ | $\mathbf{3 , 8 0 0 , 2 6 8}$ |

### 3.1.3 Multi-Family Program

This program addresses multi-family structures with three or more units. As such, there can be significant variation in the types of structures served under this Program, ranging from residential type dwelling with three units to large garden apartment complexes to multi-story high-rise buildings. In order to meet the specific needs of each customer, the Multi-Family Program will provide a structured screening review to identify and develop the project plan for the customer. Potential program services include customer engagement with energy efficiency education through energy assessments, installation of standard energy-savings measures, comprehensive energysavings opportunities including prescriptive equipment replacement, custom retrofit projects and engineered solutions and emergency equipment replacement. In addition, the Multi-family Program will provide on/off-bill repayment or access to financing with similar terms and enhanced incentives for low-income or affordable housing properties.

The Multi-Family Program will seek to work with each customer to determine and package the best energy-saving opportunities based on the Company’s current program offerings (e.g. direct installation of standard energy-savings measures, prescriptive equipment replacement, custom retrofit or engineered solutions), with an emphasis to encourage more comprehensive projects wherever possible. Customers will begin participation in the Multi-Family Program with a screening to identify and develop a project plan. The initial screening may include an energy assessment and installation of standard energy-saving measures to help encourage program participation. The assessment will also identify additional energy-saving opportunities and develop the project plan that is the best fit for each specific customer and building.

Applications to this program will be reviewed to determine the project plan depending on the type of housing stock and ownership structure. The screening process will consider various factors to create a project plan that will deliver a high level of energy-savings in the most cost-effective manner. Examples of these factors include, but are not limited to:

- Building size
- Number of units
- If the facility is being served by a central plant
- If there are individual heating and cooling units
- If there are building envelope/weatherization opportunities
- Application review with a potential virtual site inspection
- Application review with potential telephone interview with Property Management
- An on-site pre-scoping audit may be performed

Depending upon the screening results and the customer's interests, a customer's project plan could include direct installation of standard energy-saving measures, incentives for prescriptive equipment replacement, custom retrofit opportunities, or a Comprehensive Engineered Solutions project. The measures within the project plan will be consistent with the terms and conditions of the Company's applicable residential and/or commercial \& industrial program offerings (e.g. Existing Homes, Efficient Products, Energy Solutions for Business). Therefore, the project plan can include prescriptive measures with set energy savings and/or custom projects with savings on a project basis. Please refer to these program descriptions for more information on these program offerings and the associated terms and conditions, including delivery methods and contractor roles.

## Target Market or Segment

All multi-family buildings with three or more units that are served by at least one investor owned utility are eligible to participate. The Program targets multi-family property owners, property managers, and residents, who, because of the building owner - tenant relationship, have always had difficulty investing in energy efficiency equipment. The utilities will also target outreach to economically qualified occupants and owners of multi-family buildings who may be eligible for enhanced incentives. Eligibility for these enhanced incentives can be automatic based upon the type of property that has a Low or Moderate-Income designation (e.g. New Jersey Housing and Mortgage Financing Agency qualified, Housing Authorities) or by a physical location (e.g. census tract, environmental justice community, Urban Enterprise Zone). The program may refer prospective customers to Comfort Partners as appropriate.

## Marketing Plan

The marketing strategy will focus on informing property owners, managers, associations, tenant groups, municipalities, and community organizations about the availability and benefits of the program and how to participate. Marketing activities will also target lower and moderate-income multi-family sector. Key elements of the marketing strategy may include:

- Targeted outreach through direct mailings and presentations to inform property owners, managers, apartment associations, tenant groups, municipalities and community organizations about the benefits of the program and participation processes
- Brochures highlighting the benefits and features of the program as well as the enrollment and participation processes
- Website content providing program information resources and contact information
- In-person visits by program representatives to properties with three or more units
- Energy assessments of properties may include the direct installation of standard energysaving measures to engage, educate and promote the building owners or facility managers to participate in the other program offerings targeting deeper savings.

The primary market barriers that impact this program include:

- Business/Operational Constraints: Multi-family properties often have unique operational and time constraints that act as a barrier to implement energy efficiency projects. This barrier will be addressed by ensuring the program operates cooperatively with participants, provides program participation and technical assistance, and offers timely incentives and financing support.
- Customer Awareness and Engagement: Eligible participants may be unaware of energy efficiency opportunities and programs because the segment has historically not been well served by traditional energy efficiency programs. To address this barrier, this program was designed specifically to support the multi-family segment. The utilities will execute targeted outreach strategies to ensure that relevant customers are aware of program opportunities and consider energy efficiency in equipment investments and long-term planning. The program will also prepare and distribute successful case studies of prior participants and their experiences and energy-savings. To increase awareness among customers with English as a second language, utilities will develop and provide outreach
materials in Spanish. The utilities intend to be active participants in both the Equity and Marketing Working groups, and expect to address the need and cost for developing materials in a broader range of languages as part of those discussions.
- Cost Effectiveness: Efficiency upgrades require an initial investment that is recovered by lower long-run operating costs and non-energy benefits. Multi-family projects may carry longer payback periods than traditional energy efficiency projects due to the unique needs of the segment. To address this barrier, incentives and access to OBRP or similar financing options will be provided to the customer to reduce the initial cost. The utilities will also communicate the non-energy benefits offered by many efficiency upgrades that may not be captured in the cost/benefit analysis to further promote efficiency upgrades to customers.

Additionally, the utilities considered the following market barriers identified in the Utility Demographic and Firmographic Profile 2020 Study ${ }^{9}$.

- Split incentives: Multi-family properties can face challenges for energy efficiency improvements since the owner generally does not pay the utility bills and may not reap the full benefit of any energy efficiency investment. To address this barrier, the utilities will market to both landlords and tenants to assure that those exposed to energy costs are able to participate in the program, provide low- and no-cost measures at no cost to the tenant or the landlord, and offer comprehensive approaches for multi-family, including application, technical and engineering support to design cost-effective projects with benefits for owners and renters. Utilities may also provide technical and outreach assistance to property owners and managers in developing and marketing green properties to attract tenants.
- Complex buying process: There can be a broad range of potential energy efficiency investments, but it can be challenging to identify which strategies may be the most beneficial for owners and/or tenants. To address this barrier, the program will provide customized screening and on-going support to help find the best solution for the customer and include incentives to encourage the customer to implement the recommended solutions.

The utilities will seek to manage all barriers to program success through a commitment to applying best practices in program design, delivery, outreach, and marketing/advertising. The utilities will leverage their established customer communication channels, data, and brand in the marketplace to identify and confront market barriers on an ongoing basis.

## Implementation Plan, Delivery Method and Contractor Roles (MFR II.a.v) (MFR II.a.viii) (MFR.II.c)

The Multi-Family Program will be delivered in coordination between both the Lead Utility and the Partner Utility (where applicable) and/or qualified third-party implementation contractor(s)

[^40]with experience delivering similar programs. Because of the unique and varied nature of the multifamily market Program representatives will build relationships with property management companies, owners, associations and their members to recruit participation in the Program. The Program will assist customers as necessary to coordinate scheduling of the Energy Assessment and direct installations and will provide program and technical support to complete program and rebate application requirements.

Delivery of energy-saving measures will be dependent on the project plan and may include direct install standard energy-saving measures, installation of prescriptive measures, or custom projects. It may be necessary to schedule appointments for the installation of energy-saving measures in the individual living units and common areas. In-unit HVAC tune-ups may also be offered to the property owner or tenant. The installation crews are trained on the technical and educational aspects of the energy-saving devices installed and leave educational materials in each unit describing the work performed and explaining the energy-saving benefits.

## Existing and Proposed Incentives

Refer to Appendix A for the Rebate and Incentive Matrix.

## Customer Financing Options

Refer to Appendix C for the Customer Financing Options by Program.

## Customer Access to Current and Historic Energy Usage Data (MFR II.a.vii)

ACE customers will have access to extensive customer data and bill analysis tools through the MyAccount feature of online customer service. Up to one year of usage data is also available on customers’ electric bills.

## Projected Participants and Energy-savings

The table below summarizes the projected participation and savings associated with this Program. All values are annual incremental totals, and do not incorporate savings achieved in prior years. Savings estimates are based on projected participation during each year of the forecast period.

Table 7. Multifamily Program Estimated Participation and Savings

| Metric | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Estimated Participants | 1,060 | 2,088 | 3,117 |
| Projected Net Annual Natural Gas Savings (therms) | 4,750 | 13,523 | 15,966 |
| Projected Net Lifetime Natural Gas Savings (therms) | 53,492 | 192,903 | 205,713 |


| Projected Net Lifetime Natural Gas Savings from Qualifying <br> Low-Income Customers (therms) | 0 | 0 | 0 |
| :--- | ---: | ---: | ---: |
| Projected Net Annual Electric Savings (kWh) | 968,395 | $2,298,119$ | $3,239,704$ |
| Projected Net Lifetime Electric Savings (kWh) | $11,065,356$ | $29,366,170$ | $39,904,208$ |
| Projected Net Lifetime Electric Savings from Qualifying Low- <br> Income Customers (kWh) | 0 | 0 | 0 |
| Projected Net Annual Peak Demand Savings (kW) | 11 | 28 | 38 |
| Projected Net Lifetime Peak Demand Savings (kW) | 123 | 372 | 484 |

For customers in areas where gas and electric service territories overlap, the utilities will use the Program Coordinator to allocate costs and energy-savings. Refer to Section 10 for a description of the role of the Program Coordinator.

## Program Budget and Project Costs by Year

The following table provides projected program costs, by year, broken down into the following categories, as applicable: capital cost; utility administration; marketing; outside services; incentives (including rebates and low- or no- interest loans); inspections and quality control; and evaluation.

Table 8. Multifamily Program Estimated Program Expenditures by Cost Category and Year (\$)

| Cost Category | PY 1 | PY 2 | PY3 |
| :--- | ---: | ---: | ---: |
| Capital Cost | 0 | 0 | 0 |
| Utility Administration | 26,620 | 60,045 | 77,318 |
| Marketing | 12,743 | 30,710 | 42,450 |
| Outside Services | 54,738 | 120,302 | 150,229 |
| Incentives-rebates and other | 440,185 | $1,060,864$ | $1,466,399$ |
| Incentives-financing | 0 | 52,872 | 52,872 |
| Inspections and Quality Control | 15,369 | $\mathbf{3 , 9 5 8}$ | 6,672 |

### 3.1.4 Small Business Direct Install

The Small Business Direct Install Program is focused on installation of efficiency measures for small businesses, non-profit organizations, municipalities, schools and faith-based organizations ("eligible customers") that typically lack the time, knowledge, or financial resources necessary to investigate and pursue energy efficiency. The program is designed to provide eligible customers with easy investment decisions for the direct installation of energy efficiency projects. The program will pay a percentage of the up-front cost to install the recommended energy efficiency measures, with the participating customer contributing the balance of the project not covered by the incentive. The program will also provide a repayment option to the customer for their required contribution. The no-cost energy assessment mitigates the time constraints and knowledge barriers, while the reduced overall costs and repayment options mitigate up-front cost barriers and assist participants in making decisions, which otherwise would be time-consuming and difficult to justify. The C\&I Direct Install program plays an important role in the marketplace because private providers of energy efficiency services typically do not target smaller customers due to the lower overall profit for their services when compared with larger non-residential customers. For these reasons, small businesses, non-profit organizations, municipalities, schools, and faith-based organizations are often hard to reach, and the program fills an important gap by targeting, promoting, and delivering efficiency services to these customers directly.

The energy assessment will be provided to customers free of charge and will offer recommendations on energy efficiency measures to reduce energy usage and costs. Standard basic energy savings measures may also be provided or installed at no cost at the time of the energy assessment to support customer engagement, participation, and energy savings.

The program will also focus on the smallest customers within the eligible customer segment. ACE anticipates portions of the program to be directed at restaurants, small offices, convenience stores and other small independent businesses that often are left behind in less-comprehensive energy efficiency programs. Through a number of delivery mechanisms, ACE will assure that all eligible business types are able to participate in this program.

## Target Market or Segment (MFR II.a.ii)

The program seeks to address the most cost-effective measures (e.g. LED lighting retrofits) but will also address all measure retrofits that would comprise a cost-effective project. Examples of end-use categories covered by the program include lighting, HVAC, controls, refrigeration, food service, motors, low-flow devices, pipe wrap and domestic hot water equipment.

The program will be divided into two tiers of eligibility, determined by the customer's individual facility average peak electrical demand. Tier 1 will serve the smallest of the eligible customer base, specifically focusing on customers with an average individual facility peak electrical demand of up to 100 kW . Additionally, customers located in an Urban Enterprise Zone, Opportunity Zone, owned or operated by a local government, or K-12 public schools. may also qualify for Tier 1 status, up to an average individual facility peak electrical demand of 200 kW . Tier 2 will serve the larger segment of small non-residential customers, with an average individual facility peak electrical demand of 101-200 kW. This figure may be increased by ACE to ensure the program is properly addressing the market in ACE's service territory.

## Marketing Plan (MFR II.a.xiv)

The C\&I Direct Install Program will be marketed to customers through a combination of direct outreach by program staff, and/or the third-party implementation contractor, web-based engagement and customer information analytics, digital advertising, and hard-copy materials to promote awareness among trade allies and customers. Direct outreach may include visits to customer premises to distribute hard-copy program materials, inform customers about the program directly, and solicit participation. Additionally, ACE may engage community partners, including chambers of commerce and other local organizations including those comprised of underrepresented and socially or economically disadvantaged individuals. ACE will also consider the potential to utilize customer information analytics or other targeted energy education outreach to identify and target customers best suited for participation in the program. The collective marketing plan strategy is useful for enrolling eligible customers that may be interested in participating but have not heard of the program and do not have the time or resources to prioritize investigating energy efficiency opportunities or reaching out to ACE.

The primary market barriers that impact this program include:

- Customer Awareness and Engagement: Small businesses, non-profit organizations, schools and faith-based organizations typically have limited resources and time to consider or prioritize energy efficiency and may have efficiency needs not well aligned with traditional commercial demand side management (DSM) programs targeted at larger customers. This program is intended to confront these market barriers by providing turnkey, direct installation of efficiency measures tailored to these eligible customers at no cost, while identifying additional efficiency opportunities directly on-site, and through directly soliciting eligible customers for participation. This personalized approach builds trust and achieves results while increasing the likelihood of further participation referrals. To increase participation rates among a diverse demographic, utilities may include focused outreach efforts to reach minority- and women-owned small businesses, and start-ups by engaging with business groups and organizations that support these customers. Partner business groups might include the Chamber of Commerce and the Small Business Administration. Utilities may also explore providing outreach materials in Spanish to reach Spanish-speaking business owners.
- Initial Cost of Efficiency Investments: Recommended energy efficiency projects that go beyond direct-install measures will require more participant investment and commitment. This barrier will be addressed through offering incentives and a repayment option, as well as through operating a program that is flexible and easy for small business customers to utilize.
- Landlord/Tenant Arrangements: Split incentives between landlord/tenants with respect to who pays for energy use versus who owns the energy-using equipment present a unique challenge because the investor in the equipment does not experience an immediate benefit. The subprogram will employ strategies to help the landlord understand the long-term benefits of participating. This subprogram will be marketed to both landlords and tenants to assure that those exposed to energy costs and investments are able to participate in the
program. Utilities may also provide technical and outreach assistance to property owners and managers in developing and marketing green properties.

ACE will seek to manage barriers to program success through a commitment to monitoring program performance and feedback channels for assessing effective program design, delivery, outreach, and marketing and advertising, and improvement opportunities. ACE's established customer communication channels, data, and brand in the marketplace will all be leveraged to deliver best-practice programs that identify and confront market barriers on an ongoing basis. To the extent possible, ACE will cross-promote program offerings to spread awareness of the range of efficiency opportunities proposed in this plan.

## Implementation Plan, Delivery Method and Contractor Roles (MFR II.a.v) (MFR II.a.viii) (MFR.II.c)

The C\&I Direct Install Program interfaces with customers via either direct solicitation or upon customer request. All participants receive a site visit, including a free on-site energy assessment to identify energy efficiency retrofit opportunities. Standard basic energy savings measures may also be provided at no cost at the time of the energy assessment for eligible Tier 1 customers, to support customer engagement, participation, and energy savings. Following the energy assessment, participants are provided with a report assessing the site and recommending investments that could further improve the energy efficiency of the facility.

Based on the results of the energy assessment report, the program will offer to initially pay a percentage of the project cost to install the recommended energy efficiency measures with the participating customer (and/or landlord). The program will also provide a payment option to the customer (and/or landlord) for their portion of the project cost. ACE will provide for the installation of all work and assure it is completed on time and to specifications. This approach frees up the participant, who may not have the time or resources to dedicate to project implementation. The distinction between Tier 1 and Tier 2 eligibility criteria will ensure that eligible customers, even those that are the smallest and often overlooked, receive ample focus. The simple, turnkey solution provides eligible customers with the initial site visit, energy assessment, and installation of recommended efficiency measures at no initial cost to participants.

ACE will administer and manage the program with the support of third-party implementation contractor(s) and/or Utility staff. The third-party implementation contractor or Utility Staff will have responsibility for most delivery tasks and customer outreach on behalf of ACE. The thirdparty implementation contractor will work closely with ACE to optimize the program offering, including, but not limited to:

- Initial participant recruitment, energy assessment, and equipment installation
- Program data tracking
- Direct customer outreach/program delivery strategy
- Development of measure mix
- Marketing
- Promotion of emerging technology
- Customer satisfaction

The third-party implementation contractor or Utility Staff will take on the responsibility of implementing the program, directing the qualification and enrollment of participating contractors, and will work to assure that ample participating contractors are available to complete all work derived from the program. The participating contractors will perform the energy assessments and installations, working with ACE and/or the third-party implementation contractor's oversight to undertake all construction and installation work identified in the energy assessment process.

## Existing and Proposed Incentives Ranges (MFR II.a.iii) (MFR II.a.iv)

Both tiers of the program will encompass many of the same benefits, including a simple, turnkey solution for eligible customers, which requires no up-front investment. The initial site visit, energy assessment, and installation of recommended energy efficiency measures are provided at no initial cost to participants. The utilities propose to provide an incentive level of up to $70-80 \%$ of the project costs, and to continue discussions to determine the appropriate level and at what level the incentive is applied to best promote the completion of comprehensive projects while maintaining overall program cost effectiveness. Additionally, the utilities plan to coordinate on the methodologies and calculations used to determine energy savings and program incentives.

For Tier 1 customers, standard basic energy savings measures may be installed at no cost during the time of the energy assessment. The program will offer to pay up to $80 \%$ of the project cost to install the recommended energy efficiency measures with the participating customer (and/or landlord) repaying the balance not covered through the incentive either in a lump sum or through an available repayment option. Customers located in an Urban Enterprise Zone, Opportunity Zone, owned or operated by a local government, or K-12 public schools. may also qualify for Tier 1 status, up to an average individual facility peak electrical demand of 200 kW .

Tier 2 will serve the larger segment of eligible customers, with an average individual facility peak electrical demand of $101-200 \mathrm{~kW}$. Incentives up to $70 \%$ of the total project cost will be offered.

## Customer Financing Options (MFR II.a.vi)

The participating customer will repay the balance not covered through the incentive either in a lump sum or through a financing option. Refer to Appendix C for the for the Customer Financing Options by Program.

## Projected Participants (MFR II.a.ix) and Energy Savings (MFR II.a.x)

The table below summarizes the projected participation and savings associated with this program. All values are annual incremental totals, and do not incorporate savings achieved in prior years. Participation estimates are calculated as the sum of expected number of small businesses participating in the program. Savings estimates are based on projected participation during each year of the forecast period.

Table 9. C\&I Direct Install Estimated Participation and Savings

| Metric | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Estimated Participants | 45 | 180 | 189 |
| Projected Net Annual Natural Gas Savings (therms) | 62,140 | 248,559 | 260,987 |


| Projected Net Lifetime Natural Gas Savings (therms) | 932,098 | $3,728,392$ | $3,914,812$ |
| :--- | ---: | ---: | ---: |
| Projected Net Lifetime Natural Gas Savings from <br> Qualifying Small Commercial Customers (therms) | 932,098 | $3,728,392$ | $3,914,812$ |
| Projected Net Annual Electric Savings (kWh) | $2,090,841$ | $8,363,365$ | $8,781,533$ |
| Projected Net Lifetime Electric Savings (kWh) | $31,362,618$ | $125,450,472$ | $131,722,996$ |
| Projected Net Lifetime Electric Savings from <br> Qualifying Small Commercial Customers (kWh) | $31,362,618$ | $125,450,472$ | $131,722,996$ |
| Projected Net Annual Peak Demand Savings (kW) | 58 | 232 | 243 |
| Projected Net Lifetime Peak Demand Savings (kW) | 868 | 3,473 | 3,646 |

* Represents all savings from lead utility projects


## Program Budget (MFR II a.xi) (MFR II.a.xii)

The following table provides the Program budget broken down by the following categories: capital cost; utility administration; marketing; outside services; incentives (including rebates and low- or no- interest loans); inspections and quality control; and evaluation.

Table 10. C\&I Direct Install Estimated Program Expenditures by Cost Category and Year (\$)

| Cost Category | $\mathbf{P Y 1}$ | $\mathbf{P Y 2}$ | PY3 |
| :--- | ---: | ---: | ---: |
| Capital Cost | 0 | 0 | 0 |
| Utility Administration | 25,956 | 86,887 | 73,447 |
| Marketing | 273,849 | 921,834 | 785,688 |
| Outside Services | 848,140 | $3,041,829$ | $2,825,654$ |
| Incentives-rebates and other | $1,901,400$ | $7,605,602$ | $7,985,882$ |
| Incentives-financing | 138,553 | 554,211 | 581,922 |
| Inspections and Quality Control | 2,884 | 9,654 | 8,161 |
| Evaluation | 24,652 | 98,609 | 103,540 |
| Total | $\mathbf{3 , 2 1 5 , 4 3 4}$ | $\mathbf{1 2 , 3 1 8 , 6 2 7}$ | $\mathbf{1 2 , 3 6 4 , 2 9 4}$ |

### 3.1.5 Energy Solutions for Business: Prescriptive and Custom

The C\&I Prescriptive and Custom Measure subprogram will promote the installation of highefficiency electric and/or natural gas equipment by ACE C\&I customers, either via the installation of prescriptive or custom measures or projects. The subprogram provides prescriptive-based incentives to commercial and industrial customers to purchase and install energy efficient products. The subprogram will continue to support and/or provide downstream approaches to ensure the market is properly supported. The subprogram may also provide midstream or upstream incentives or buydowns and support to manufacturers, distributors, contractors, and retailers that sell select energy efficient products. These measures will incent energy efficient lighting, appliances, heating and cooling equipment, and food service equipment, among other efficiency measures. Type and value of incentive provided will range and will include electric and/or natural gas technologies that improve energy efficiency. Up-front rebates will be offered to reduce initial costs and some purchases may qualify for low- to no-interest financing to further reduce first-year cost barriers. Prescriptive measures are designed to provide easy and cost-effective access to energy efficient measures through customers' preferred channels.

Prescriptive rebates are designed to:

- Provide incentives to facility owners and operators for the installation of high efficiency equipment and controls
- Promote the marketing of high efficiency measures by trade allies such as electrical contractors, mechanical contractors, and their distributors to increase market demand.
- Ensure the participation process is clear and simple

Prescriptive incentives will increase adoption of energy efficient equipment by harnessing ACE's unique customer relationships to positively impact the entire sales process surrounding efficient equipment, from education and awareness with customers, engagement with trade ally contractors and equipment distributors, to financing opportunities for the high efficiency equipment.

The subprogram also includes custom measures that provide calculated or performance-based incentives for electric and/or natural gas efficiency opportunities for commercial, industrial, and other non-residential customers that are non-standard and not captured by prescriptive equipment. Calculated or performance-based incentives are designed to reduce the customer's capital investment for qualifying energy efficient equipment, to retrofit specialized processes and applications and/or to implement qualifying high efficiency building shell or systems improvements. Typical custom measures that are eligible for incentives are either less common measures or efficiency opportunities in specialized applications that may include manufacturing or industry-specific processes, or non-traditional use cases. In many cases, custom efficiency projects are more complex than prescriptive equipment replacement.

Potential participants are required to submit an application for pre-approval to confirm project eligibility and reserve funding. The Utility and/or implementation contractors will develop electronic rebate application forms that will guide applicants through eligibility guidelines, subprogram requirements, terms and conditions, and general information. In addition, the Utility and/or implementation contractors will provide applications in web ready formats to ensure
participants have easy access to the forms. The pre-approval process provides for the review of the customer's proposed project to confirm measure eligibility and incentive budget availability. This also supports the Company's subprogram management because it communicates projects that are in the pipeline. If accepted and pre-approved by ACE, a timeline is established for project completion to qualify for a rebate. The typical lead time for completing a custom project is 90 to 120 days but can be longer depending on the complexity of the project. Large projects, or subsets of projects, may be required to undergo pre-and post-inspection to validate project energy savings. Approved projects may also be eligible for low to no cost financing to further reduce first-cost barriers.

## Target Market or Segment (MFR II.a.ii)

The C\&I Prescriptive and Custom Measures subprogram will be available to all commercial, industrial, and other non-residential customers located within ACE's service territory. This subprogram is focused on promoting the sale and installation of efficient electric and/or natural gas equipment across all major end-use categories and can be easily promoted to trade allies and customers via straightforward prescriptive rebates, or more complex custom rebates. Potential technologies incentivized through prescriptive measures include energy efficient lighting, appliances, heating and cooling equipment, and food service equipment, among other efficiency measures. Customers pursuing custom incentives will generally be customers with more complex needs and non-standard efficiency opportunities. Typically include building types such as light/heavy industrial, manufacturing, data centers, and distribution centers, among others.

## Marketing Plan (MFR II.a.xiv)

The C\&I Prescriptive and Custom Measures subprogram will engage with customers and trade allies at multiple levels, including broad-based energy efficiency awareness campaigns, direct outreach by subprogram staff and representatives, web-based engagement and information, digital advertising, and hard-copy materials to promote awareness among trade allies and customers. In some cases, subprogram staff and representatives will reach out directly to large customers. Use of appropriate types of media are anticipated to be included in the marketing plan, such as direct mail, email, print, and digital media. Engagement with trade associations (e.g. builders, architects, engineers, equipment distributors, professional and contractor associations, etc.) will also be important venues for ACE to present information about the subprogram, raise awareness and encourage participation.

Marketing will be used to target specific customer sectors to ensure awareness in the subprogram and enhance participation. The Company and/or implementation contractor will target various market sectors (i.e. education, medical/health care, manufacturing, retail, food service) to enhance participation and promote a cross-section of measures applicable to each market. Since prescriptive retrofits are generally one-for-one replacements, measure-specific collateral pieces will be developed for new measures or enhanced for continuing measures. These will be delivered to sectors most likely to utilize the specific technology. Fact sheets, mailings, post cards, e-blasts, and on-location seminars will also be used to promote specific measures. Custom marketing efforts require a consistent and directed outreach to trade allies and associations, The Utility and/or implementation contractors will be required to develop and implement a marketing plan to identify and target customers to connect them to appropriate measures using e-blasts, webinars, on-site seminars, and large customer publications, among other marketing and outreach initiatives.

Further, in order to attract multiple measure participation, the Utility and/or implementation contractor will outreach via sectors, as well as to trade allies and associations such as architects, engineers and professional associations. Targeted advertisements in industry/trade publications will also be required to bring awareness to the opportunities and savings available through the Custom offering.

The primary market barriers that impact this subprogram include:

- Initial Cost of Efficient Equipment: Relative to the market baseline, efficient equipment often carries a higher upfront premium but a lower lifetime operating cost. Purchasers often may not fully value the lifetime operating cost advantage of efficient equipment and as a result, higher upfront cost is a barrier to purchasing efficient equipment. To address this barrier, incentives are provided to the customer to reduce the initial cost through a variety of channels including at midstream and downstream points. Access to financing for certain measures will also help address this barrier.
- Customer Awareness and Engagement: Commercial and Industrial customers may not be aware of the benefits of installing efficient equipment and/or lack the time and resources to pursue efficient equipment when replacing existing equipment. To address this barrier, ACE will educate customers on the benefits of installing efficient equipment through targeted marketing, ensure that incentives are easily accessible, and encourage market transformation and stocking of efficient equipment through midstream incentives. Through outreach efforts, ACE will seek to partner with retail and wholesale entities to promote program offerings, and also focus marketing, education, and outreach efforts on the trade ally community to ensure that trade allies are aware of available incentives and prepared to serve customers. To increase participation rates among a diverse demographic, utilities may include focused outreach efforts to reach minority- and women-owned small businesses, and start-ups by engaging with business groups and organizations that support these customers. Partner business groups might include the Chamber of Commerce, and the Small Business Administration. Utilities may also explore providing outreach materials in Spanish to reach Spanish-speaking business owners.
- Landlord/Tenant Arrangements: Split incentives between landlords, who own the energy-using equipment, and tenants, who pay for energy use, present a unique challenge because the investor in the equipment does not experience an immediate benefit. The subprogram will employ strategies to help the landlord understand the long-term benefits of participating. This subprogram will be marketed to both landlords and tenants to assure those exposed to energy costs are able to participate in program. Utilities may also provide technical and outreach assistance to property owners and managers in developing and marketing green properties.
- Sufficient Stocking and Availability of Efficient Products: To support a robust marketplace for efficient equipment, ACE may promote midstream incentives for specific equipment types to encourage participation via incentives for distributors or retailers to stock and promote the purchase of or for directly marking down the cost of the efficient equipment at the point of sale.

ACE will seek to manage barriers to subprogram success through a commitment to monitoring program performance and feedback channels for assessing effective program design, delivery,
outreach, and marketing/advertising, and improvement opportunities. ACE's established customer communication channels, data, and brand in the marketplace will all be leveraged to deliver best-practice programs that identify and confront market barriers on an ongoing basis. ACE will cross-promote programs and subprograms to spread awareness of the range of efficiency opportunities proposed in this plan.

## Implementation Plan, Delivery Method and Contractor Roles (MFR II.a.v) (MFR II.a.viii) (MFR.II.c) -

ACE may outsource some, or all, of the implementation of this subprogram to an implementation contractor who would be responsible for defined functions, which could include administration, marketing, application processing and documentation regarding purchased products and processing incentives and rebates. The Company will perform overall administration and oversight of the subprogram. To maximize customer participation and streamline the customer experience, ACE will use its strong customer and marketplace relationships to support multiple implementation strategies to achieve subprogram goals.

- Trade Allies: ACE and/or the implementation contractor will target trade allies (e.g. electricians, HVAC contractors, lighting retailers and distributors, building energy managers, etc.) to promote the efficiency opportunities and incentives to their clients. Preserving this downstream approach will ensure that customers and trade allies are properly supported. Trade allies will be able to leverage the subprogram and offer customers rebates through their normal course of business. By developing relationships with trade allies, the subprogram will develop a broad reach across the marketplace and solicit feedback to ensure incentives and measures are impacting the market as designed. Examples of targeted trade ally firms include:
o Design, engineering, and controls firms
o HVAC distributors, contractors, and retail providers
o Food service retailers and service providers
o Commercial lighting distributors and wholesalers
- Retail: ACE subprogram staff, the implementation contractor, and/or field representatives will work with retailers and distributors that directly target C\&I customers to inform them of the participation process and available equipment incentives. The Utility and/or implementation contractor will also provide support and assistance to retailers or distributors to support identification and promotion of qualifying energy efficient products. This will also include training and instruction to participating retailers and distributors about the ACE application forms.
- Midstream: ACE and/or the implementation contractor may promote a midstream component for specific equipment types to encourage purchase of efficient equipment via directly marking down the cost of the efficient equipment at the point of sale. Midstream rebates encourage market transformation and wider availability of efficient equipment. ACE anticipates offering midstream point of sale discounts across numerous equipment types, including, but not limited to LED lighting, HVAC, and food service equipment. Efficient products that are rebated via a midstream approach will not be eligible for rebates in any other ACE rebate program. The Utility and/or implementation contractor will also provide support and assistance to distributors to support identification and promotion of qualifying energy efficient products. This will also include training and instruction to
participating distributors as well as enrollment of distributors to participate in midstream subprogram offerings
- Digital: The subprogram will be marketed directly to C\&I customers on the ACE website, where customers will have easy access to information regarding eligible equipment and savings opportunities, how to participate, and incentives across all efficient equipment types and end-uses.
- Targeted Customer Outreach: ACE staff may choose to reach out directly to large business and commercial customers to develop relationships with energy and facilities managers, operations staff, and procurement personnel. Subprogram staff can help facilitate completion of rebate applications and serve as a direct resource to these customers, providing technical support and helping to assist customers in identifying efficiency opportunities.
- Technical Customer Assistance: An important element of the C\&I Prescriptive and Custom Measures subprogram is the availability of technical support. The Utility and/or implementation contractor will provide technical support to customers on the application of the energy efficiency measures and technologies included in this subprogram, including supporting project identification, developing energy savings calculations, and assessing project economics as required.

Measurement \& Verification (M\&V) for projects that do not have reliable information to accurately forecast energy savings may require energy monitoring before and after project implementation to determine savings and incentive amounts.

It is anticipated that any third-party implementation contractor will work closely with ACE to optimize the subprogram's strategic direction, including, but not limited to, the following activities:

- Offered incentive levels and strategies
- Customer satisfaction
- Measurement and verification during on-site visits
- Subprogram data tracking
- Rebate payments

ACE may select a qualified third-party implementation contractor (or contractors) based on, but not limited to, the following factors:

- Technical Approach
- Organizational and Management Capability
- Experience
- Cost
- The amount of business placed with minority, women, veteran, and service-disabled veteran owned businesses ("MWVBEs").

A comprehensive contractor agreement, containing information about equipment certification (such as DLC lighting, etc.), licensing, insurance requirements and more, will be developed and provided to all participating contractors.

## Existing and Proposed Incentives Ranges (MFR II.a.iii) (MFR II.a.iv)

The utilities propose to provide a range of incentives depending on the measure type, subject to changes based upon customer response and market conditions over the plan period. Incentives will vary depending on factors including but not limited to the specific product, the incremental cost of the high-efficiency technology, and the product maturity in the marketplace. Appendix A for the Rebate and Incentive Matrix.

In instances where incentives are not immediate, the utilities will complete consumer or contractor payments within 60 days following completion of contractor work, submission of complete and required paperwork, and completion of program requirements such as necessary field inspections (if required).

## Customer Financing Options (MFR II.a.vi)

The participating customer will repay the balance not covered through the incentive either in a lump sum or through a financing option. Refer to Appendix C for the Customer Financing Options by Program.

## Projected Participants (MFR II.a.ix) and Energy Savings (MFR II.a.x)

The table below summarizes the projected participation and savings associated with this subprogram. All values are annual incremental totals, and do not incorporate savings achieved in prior years. Savings estimates are based on projected participation during each year of the forecast period.

Table 11. C\&I Prescriptive and Custom Estimated Participation and Savings

| Metric | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Estimated Participants | 95,134 | 126,542 | 169,482 |
| Projected Net Annual Natural Gas Savings (therms) | $-91,057$ | $-121,106$ | $-161,820$ |
| Projected Net Lifetime Natural Gas Savings (therms) | $-1,854,229$ | $-2,466,124$ | $-3,291,111$ |
| Projected Net Lifetime Natural Gas Savings from <br> Qualifying Low-Income Customers (therms) | 0 | 0 | 0 |
| Projected Net Annual Electric Savings (kWh) | $18,930,154$ | $27,604,255$ | $36,619,336$ |
| Projected Net Lifetime Electric Savings (kWh) | $277,330,976$ | $407,684,603$ | $540,419,422$ |
| Projected Net Lifetime Electric Savings from <br> Qualifying Low-Income Customers (kWh) | 0 | 0 | 0 |
| Projected Net Annual Peak Demand Savings (kW) | 496 | 715 | 949 |
| Projected Net Lifetime Peak Demand Savings (kW) | 7,386 | 10,709 | 14,209 |

* Represents all savings from lead utility projects. ACE expects small business participation in this subprogram but did not estimate for this table.

For customers in areas where gas and electric service territories overlap, the utilities will use the Program Coordinator to allocate costs and energy savings for shared measures and for certain
comprehensive projects. Refer to Section 10 for a description of the role of the Program Coordinator.

## Subprogram Budget (MFR II a.xi) (MFR II.a.xii)

The following table provides the subprogram budget broken down by the following categories: capital cost; utility administration; marketing; outside services; incentives (including rebates and low- or no- interest loans); inspections and quality control; and evaluation.

Table 12. C\&I Prescriptive and Custom Estimated Program Budget (\$)

| Cost Category | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Capital Cost | 0 | 0 | 0 |
| Utility Administration | 22,268 | 37,299 | 43,322 |
| Marketing | 95,746 | 156,354 | 176,487 |
| Outside Services | 534,565 | 841,338 | 988,952 |
| Incentives-rebates and other | $1,479,430$ | $2,391,270$ | $3,136,800$ |
| Incentives-financing | 339,281 | 486,798 | 644,953 |
| Inspections and Quality Control | 2,474 | 4,144 | 4,814 |
| Evaluation | 70,497 | 103,951 | $\mathbf{1 1 6 , 8 0 7}$ |
| Total | $2,544,260$ | $\mathbf{4 , 0 2 1 , 1 5 4}$ | $\mathbf{5 , 1 1 2 , 1 3 5}$ |

### 3.2 Utility-Led Subprograms

Behavioral Program: This program initially includes behavioral initiatives and energy education. This program can reach a significant portion of the utility customer base, including low- to moderate-income segment, and share personalized education, including guidance on low and nocost energy-saving strategies.

Existing Homes: Quick Home Energy Check-Up (QHEC): This subprogram helps customers understand their best opportunities to save energy through an in-home consultation and ensures savings through the direct installation of energy-saving measures. It will be designed to help renters as well as homeowners, and promotes additional energy-saving programs and opportunities that are appropriate for the customer.

Existing Homes: Moderate Income Weatherization: This subprogram provides an opportunity for low- to moderate-income customers to receive energy efficiency measures and upgrades at no cost.

Energy Solutions for Business: Engineered Solutions: This subprogram provides tailored energy efficiency savings for medium to large commercial customers, including municipalities, universities, schools, hospitals, and non-profit entities.

Energy Solutions for Business: Energy Management: This subprogram provides incentives to C\&I customers to more efficiently manage energy consumption at facilities. The subprogram includes incentives for several approaches to energy management focused on optimizing equipment and processes at commercial facilities.

Note: Comfort Partners, the comprehensive energy efficiency solution for low income customers in New Jersey, is not addressed within this filing since it is intended to be run as a Co-Managed Program under Societal Benefits Clause funding which is not the subject of this proceeding.

### 3.2.1 Behavior Program

The ACE Behavior Program builds on several years of experience in driving residential customer behavior change through reported data and information about personal energy consumption. This program reduces energy consumption and saves customers money. The Home Energy Reports ("HERs") distributed through the Behavior Program provide energy usage information through a different lens to help customers better understand energy use patterns, including:

- Monthly energy consumption for the home
- Comparison of energy use to similar homes
- Savings opportunities for customers
- Ways to participate in energy efficiency programs
- Energy-savings tips
- How to engage with utilities

HERs are provided to customers through multiple channels including direct mail and email. This information is provided to customers to gain better insights into their own energy use as well as inform them how they compare to their peers. This comparison is a significant driver of behavior change in customers.

HERs lead to greater customer satisfaction and better engagement with the energy efficiency programs and the Company. Part of this satisfaction comes from the targeted information that can be provided to customers, including personalized energy efficiency recommendations and information about how to participate in ACE's energy efficiency programs.

The HER online portal may also include an online audit tool that allows customers to self-perform energy efficiency audits. The online audit will ask questions about a customer's house, which produces better efficiency recommendations and a more personalized HER. The online audit will be available to customers whenever they have the time and inclination to $\log$ on and complete the assessment.

## Target Market or Segment (MFR II.a.ii)

The Behavioral Program will be offered to a subset of single-family residential customers in ACE territory. At present, the population of customers expected to receive HERs could reach as high as 275,000. The actual number of participants will be established by ACE and its HER contractor to ensure an adequate sample size, control group size, and targeted savings goals. This group will be reviewed regularly to ensure that the savings are maximized in a cost-effective manner.

## Marketing Plan (MFR II.a.xiv)

HERs are provided to customers at no cost, and customers may choose to opt-out, rather than optin to receive the HERs. Therefore, this program requires no direct marketing to acquire program participants. This program will promote ACE's other energy efficiency programs and specific energy-saving opportunities for customers.

HERs may encourage customers to use an online audit tool, which will be marketed though billinsert mailers, digital advertising, and other pathways. Participants in other ACE residential efficiency programs will also be referred to the online audit tool as appropriate.

The market barriers for this program include:

- Customer Attention: Customers may not read the reports and act on potential savings opportunities. To address this barrier, ACE intends to communicate with the customer in the way that is best for them. Reports will be delivered by mail, by email, and through a web portal. This multi-mode communications strategy will allow customers to engage based on their level of comfort and be made aware of how their decisions impact energy usage. ACE will know in real time how customers are responding to the program (because savings are estimated on a regular interval) and can adjust the treatment group and delivery mechanism as needed.
- Customer Understanding of Opportunities: Customers may not understand the opportunities to save energy in their homes or where to start. To address this barrier, messaging in the HERs will include customized, easy to understand recommendations for customers based on their usage data. Reports will also include information on how to participate in other ACE energy efficiency programs.
- Customer Indifference and Energy-Use Habits: Customers may have well-established poor energy use habits and may be indifferent to making any behavioral changes. Years of evaluation studies in different jurisdictions have shown that behavioral programs have electric savings rates from $0.5 \%$ to $5.2 \%$ per year. ${ }^{10}$ Knowing how they use energy in comparison to peers may not convince every customer to act, but in the aggregate, there is a measurable behavioral change of those customers receiving the reports.

ACE will seek to manage all barriers to program success by applying best practices in program design, delivery, outreach, and marketing. ACE's established customer communication channels, data, and branding will be leveraged to deliver best-practice programs that identify and confront market barriers throughout the program cycle. To the extent possible, ACE will cross-promote programs through the HERs to increase awareness of the other program proposed in this plan.

## Implementation Plan, Delivery Method, and Contractor Roles (MFR II.a.v) (MFR II.a.viii) (MFR.II.c)

HERs will be delivered by a competitively selected contractor. This contractor will be asked to provide hard copy mail-delivered reports and emailed reports. ACE will work with the selected HER contractor to determine the best suite of options to deliver to customers, including high-usage warnings, targeted energy efficiency recommendations, and other updates on usage.

These reports and access to the online portal will be provided to customers at no charge and customers will be permitted to opt-out of the program at any time.

[^41]To select qualified third-party implementation contractors, ACE will prioritize criteria including but not limited to:

- Experience delivering similar programs or initiatives
- Resources and marketing strength
- Cost
- The amount of business placed with minority, women, veteran and service-disabled veteran owned businesses ("MWVBEs").


## Existing and Proposed Incentives Ranges (MFR II.a.iii) (MFR II.a.iv)

The HER program and associated service is provided at no cost to ACE customers and they are able to opt-out at any time. The Company may add a service allowing customers to choose certain self-install measures to be sent to the customer following an online audit. These measures would be provided and shipped to the customer at no cost.

## Customer Financing Options (MFR II.a.vi)

The Behavior Program will not utilize financing.

## Customer Access to Current and Historic Energy Usage Data (MFR II.a.vii)

ACE customers will have access to extensive customer data and bill analysis tools through the MyAccount feature of online customer service. Up to one year of usage data is also available on customers' electric bills.

## Projected Participants (MFR II.a.ix) and Energy-savings (MFR II.a.x)

The table below summarizes the projected participation and savings associated with this program. All values are annual incremental totals, and do not incorporate savings achieved in prior years. Participants in the context of the home energy report subprogram are defined as a customer receiving reports over a one-year period. Savings estimates are based on projected participation during each year of the forecast period.

Table 13. Home Energy Reports Program Estimated Participation and Savings.

| Metric | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Estimated Participants | 0 | 0 | 155,000 |
| Projected Net Annual Natural Gas Savings (therms) | 0 | 0 | 0 |
| Projected Net Lifetime Natural Gas Savings (therms) | 0 | 0 | 0 |
| Projected Net Lifetime Natural Gas Savings from <br> Qualifying Low-Income Customers (therms) | 0 | 0 | 0 |
| Projected Net Annual Electric Savings (kWh) | 0 | 0 | $7,998,318$ |
| Projected Net Lifetime Electric Savings (kWh) | 0 | 0 | $7,998,318$ |


| Projected Net Lifetime Electric Savings from Qualifying <br> Low-Income Customers (kWh) | 0 | 0 | 0 |
| :--- | :--- | :--- | ---: |
| Projected Net Annual Peak Demand Savings (kW) | 0 | 0 | 1,802 |
| Projected Net Lifetime Peak Demand Savings (kW) | 0 | 0 | 1,802 |

* ACE expects Home Energy Reports to be provided to low income customers, but did not estimate the total for this table.

For customers in areas where gas and electric service territories overlap, the utilities will use the Program Coordinator to allocate costs and energy-savings for shared measures. Refer to Section 10 for a description of the role of the Program Coordinator.

## Program Budget (MFR II a.xi) (MFR II.a.xii)

The following table provides the subprogram budget broken down by the following categories: capital cost; utility administration; marketing; outside services; incentives (including rebates and low- or no- interest loans); inspections and quality control; and evaluation.

Table 14. Home Energy Report Estimated Program Expenditures by Cost Category and Year (\$)

| Cost Category | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Capital Cost | 0 | 0 | 0 |
| Utility Administration | 0 | 0 | 19,049 |
| Marketing | 0 | 0 | 0 |
| Outside Services | 0 | 0 | 0 |
| Incentives-rebates and other | 0 | 0 | 480,500 |
| Incentives-financing | 0 | 0 | 0 |
| Inspections and Quality Control | 0 | 0 | 2,117 |
| Evaluation | 0 | 0 | 1,328 |
| Total | $\mathbf{0}$ | $\mathbf{0}$ | $\mathbf{5 0 2 , 9 9 4}$ |

### 3.2.2 Existing Homes: Quick Home Energy Check-Up (QHEC)

The Quick Home Energy Checkup (QHEC) program is a no-cost turnkey offering for ACE residential customers to assess their home's energy use and realize immediate energy savings. The program will be delivered by a network of pre-qualified contractors who will visit customers' homes, conduct energy audits, and make a visual assessment of the home's systems and appliances. The contractor's report will present appropriate energy-saving opportunities and the contractor will install energy-saving measures as part of the visit. The measures installed during a QHEC may include LED lighting, water heater pipe insulation, efficient showerheads, low flow faucet aerators, and smart power strips. A smart thermostat will be installed at no cost for electric heat or central air conditioning customers.

As in-home visits may be complicated by COVID, ACE is exploring an online option for customers to identify energy-savings opportunities and have energy-savings measures shipped directly to the home for self-installation.

This program is designed to produce immediate savings on the customer's electricity bill and identify energy-saving opportunities for further consideration. It is an ideal entry point for residential customers to better understand their home's energy use and the programs available to save more energy. This program will complement other ACE residential offerings and provides a first step for customers to explore deeper savings opportunities.

## Target Market or Segment (MFR II.a.ii)

All single-family and single-family attached (1- to 4 -unit properties ${ }^{11}$ ) residential customers in ACE territory will be eligible to participate in the QHEC program.

The QHEC program will include an assessment of a home’s energy use and recommendations for energy efficiency improvements. This assessment will lead to the installation of measures that will be provided to the customer at no cost, including:

- LED light bulbs
- Faucet aerators
- Efficient showerheads
- Smart power strips
- Hot water pipe wrap
- Smart thermostat (for eligible customers)


## Marketing Plan (MFR II.a.xiv)

The QHEC program will be marketed to customers through multiple channels to increase awareness of the offering, the no-cost audit, and the no cost turnkey direct install measures. These marketing channels include:

- Bill inserts

[^42]- Social media
- Email marketing
- Contractor marketing
- Billboards and other outdoor advertising
- Flyers
- ACE website
- Radio or television advertisements

ACE also plans to cross-promote this subprogram to participants of other energy efficiency programs. Information garnered from the Residential Behavioral and Residential Efficient Products can be used to identify potential QHEC participants. For example, energy usage data contained in the Behavioral HERs can identify customers who are particularly susceptible to changes in weather and would be ideal candidates for a QHEC. Likewise, participants in the Efficient Products Program could be target-marketed and encouraged to sign up and receive additional energy-efficient measures. Most importantly, the QHEC subprogram engages customers and provides immediate energy savings, and reciprocally, generates leads for other EE programs.

Additionally, program materials will be translated into multiple languages for customers whose primary language is not English. This will ensure that all customers are aware of the offering and have a chance to participate in the QHEC program. ACE will work with its contractors to provide services to non-English speakers by asking contractors to employ multi-lingual delivery contractor employees.

The market barriers that may be faced by this program include:

- Customer Time Commitment: Customers may find it difficult to find time to participate in a home energy audit and identify measures. To address this barrier, the program is designed to allow a customer to identify savings opportunities and implement energysavings measures at the time of visit. This approach reduces the time commitment from the customer perspective while obtaining immediate energy-savings at no cost.
- Initial Cost: Residential customers have many competing priorities for the household budget, and an energy audit and measures may not be something on which they are able to allocate resources. To address this barrier, the QHEC is provided to customers at no cost, and measures are provided to customers at no cost. This program is designed to be simple for the customer and provide energy-savings.
- Ease of Process: Customers may balk at undertaking a complete BPI-certified energy audit because the process and large-scale upgrades could be daunting. To address this barrier, the QHEC is designed to identify opportunities for customers to quickly and effectively identify next steps and realize immediate savings through the installed measures.
- Split incentives: Many renters may not consider participating in energy efficiency programs because they don't own the premise and don't have a role in decisions regarding equipment replacement or structural improvements. This subprogram addresses this barrier by providing simple energy efficiency measures that provide immediate energy savings and don't require landlord approval to install or use (e.g. smart strips, LEDs).
- Customer skepticism of contractor proposals: Some customers are skeptical that contractors don't have their best interests at heart since contractors are interested in performing the work. This subprogram addresses this barrier by ensuring the entity performing the assessment would not be performing the installation work for the EE Products or HPwES program that may be recommended as potential next steps in QHEC reports.

ACE will seek to manage all barriers to program success through a commitment to applying best practices in program design, delivery, outreach, and marketing. ACE established customer communication channels, data, and branding in the marketplace will all be leveraged to deliver best-practice programs that identify and confront market barriers on an ongoing basis. To the extent possible, ACE will cross-promote programs to spread awareness of the range of efficiency opportunities proposed in this plan.

## Implementation Plan, Delivery Method, and Contractor Roles (MFR II.a.v) (MFR II.a.viii) (MFR.II.c)

The QHEC program will be delivered via an in-home energy assessment, and the Company will explore other options to provide an online component.

The in-home assessment will be delivered by a network of third-party contractors who are trained to perform the home energy assessments and install measures. Customers will enroll in the program by calling ACE's toll-free number, signing up online, or enrolling directly with a participating contractor. When it comes time for the visit, the contractor will arrive and inspect different parts of the house and equipment. This assessment will include reviewing:

- Lighting throughout the house
- Heating and cooling systems
- Insulation in walls, basements, and attics
- Appliances
- Windows and doors
- Water heating equipment

Based on the assessment the contractor will install direct install measures including LED light bulbs, hot water pipe insulation, efficient showerheads, faucet aerators, and smart power strips. Following the installation there will be a meeting with the customer to present a home energy assessment report with customized recommendations for further energy efficiency upgrades. Utility staff and/or third-party implementation contractors will maintain a close relationship with participating contractors to ensure consistent subprogram delivery experience and high customer satisfaction.

The other path for participation in the QHEC program ACE will explore implementing during the program cycle is through an online self-directed energy audit. ACE will provide an online portal which will allow customers to assess their energy use at a time that is convenient for them. This online assessment will ask the customer questions about their house, the equipment installed inside the home, their lighting, and their appliances. Based on the customer's answers, the online tool
will make recommendations for energy efficiency upgrades, as well as provide contact information for the relevant programs or contractors. Customers will also have the option to have energysavings measures shipped directly to their house for self-installation.

Contractors are the primary delivery method for the QHEC program. ACE will provide two engagement paths, and both will be contractor based:

1. For the in-home assessment path, ACE will select qualified contractors based on a rolling request for qualifications process. These contractors will have responsibility for delivering the in-home assessment, installing measures, and providing home energy reports to customers. These contractors will also be responsible for marketing their services on their website and through other channels.
2. For the online assessment path, ACE's Behavioral program provider will integrate the online audit tool into this delivery method for existing customers. To prevent customer confusion there will be one integrated online portal for customers to access their home energy reports and self-perform the home energy assessments. For customers who choose to have select measures sent to them, this will be fulfilled by a contractor as well.

To select qualified third-party implementation contractors, ACE will prioritize criteria including but not limited to:

- Experience delivering similar programs or initiatives
- Resources and marketing strength
- Knowledge of the current marketplace
- Ability to educate and train contractors
- Cost
- The amount of business placed with minority, women, veteran and service-disabled veteran owned businesses ("MWVBEs").


## Existing and Proposed Incentives (MFR II.a.iii) (MFR II.a.iv)

The QHEC program will provide a no-cost in home or online audit, as well as free direct install measures including LED light bulbs, hot water pipe insulation, efficient showerheads, faucet aerators, and smart power strips.

This program provides a no-cost audit and no-cost direct install measures, therefore there is no direct incentive payment to the customer to process.

This program is currently offered to limited ACE customers as a condition of the Exelon/PHI merger. The incentive structure of the current program, no cost audit and direct install measures, is the same as the proposed incentive structure for this program.

## Customer Financing Options (MFR II.a.vi)

Refer to Appendix C for the Customer Financing Options by Program.

## Customer Access to Current and Historic Energy Usage Data (MFR II.a.vii)

ACE customers will have access to extensive customer data and bill analysis tools through the MyAccount feature of online customer service. Up to one year of usage data is also available on customers’ electric bills.

## Projected Participants (MFR II.a.ix) and Energy-savings (MFR II.a.x)

The table below summarizes the projected participation and savings associated with this program. All values are annual incremental totals, and do not incorporate savings achieved in prior years. A participant is defined as a completed job at a customer home in the context of the QHEC subprogram. Savings estimates are based on projected participation during each year of the forecast period.

Table 15. QHEC Estimated Participation and Savings

| Metric | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Estimated Participants | 285 | 6,500 | 9,000 |
| Projected Net Annual Natural Gas Savings (therms) | 2,501 | 57,037 | 78,974 |
| Projected Net Lifetime Natural Gas Savings (therms) | 13,838 | 315,600 | 436,984 |
| Projected Net Lifetime Natural Gas Savings from <br> Qualifying Low-Income Customers (therms) | 0 | 0 | 0 |
| Projected Net Annual Electric Savings (kWh) | 272,745 | $6,835,106$ | $9,463,994$ |
| Projected Net Lifetime Electric Savings (kWh) | $3,070,738$ | $74,951,208$ | $103,778,596$ |
| Projected Net Lifetime Electric Savings from Qualifying <br> Low-Income Customers (kWh) | 0 | 0 | 0 |
| Projected Net Annual Peak Demand Savings (kW) | 3 | 60 | 754 |

* ACE expects this program to serve low income households but did not estimate the number of participants for this table.

For customers in areas where gas and electric service territories overlap, the utilities will use the Program Coordinator to allocate costs and energy-savings for shared measures. Refer to Section 10 for a description of the role of the Program Coordinator.

## Program Budget (MFR II a.xi) (MFR II.a.xii)

The following table provides the subprogram budget broken down by the following categories: capital cost; utility administration; marketing; outside services; incentives (including rebates and low- or no- interest loans); inspections and quality control; and evaluation.

Table 16. QHEC Estimated Program Expenditures by Cost Category and Year (\$)

| Cost Category | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Capital Cost | 0 | 0 | 0 |
| Utility Administration | 2,182 | 49,612 | 64,882 |
| Marketing | 14,615 | 319,781 | 400,009 |
| Outside Services | 17,128 | 384,639 | 496,125 |
| Incentives-rebates and other | 121,895 | $2,924,708$ | $4,049,595$ |
| Incentives-financing | 0 | 0 | 0 |
| Inspections and Quality Control | 242 | 5,512 | 7,209 |
| Evaluation | 1,935 | 46,439 | 64,300 |
| Total | $\mathbf{1 5 7 , 9 9 8}$ | $\mathbf{3 , 7 3 0 , 6 9 1}$ | $\mathbf{5 , 0 8 2 , 1 2 1}$ |

### 3.2.3 Existing Homes: Moderate-Income Weatherization

This program is intended to target low- to moderate-income customers in ACE territory with home energy audits and installation of energy-saving measures. The ACE service territory has a large low- or limited-income population, with $25 \%$ of households making less than $\$ 35,000$ annually and this program will allow for no-cost participation by ACE customers in the energy efficiency programs. The program will target customers in the 250-400\% above poverty threshold. Currently Comfort Partners offers no cost weatherization to customers up to $250 \%$ of poverty, so this program will provide energy-saving opportunities to moderate income customers who may struggle to participate in other programs.

The program includes an audit of the customer's home, which includes an air leakage blower door test. Contractors will then install energy-savings measures based on the results of the audit. The energy-savings measures may include lighting, weatherization (air sealing, insulation, and duct insulation), no-cost HVAC replacement (for customers with non-functioning heating systems), smart thermostats, and water saving measures. The audit and measures will be provided at no cost to the customer. All measures will be installed by a qualified contractor. The program also includes an up to amount to cover any health and safety concerns that need to be resolved to complete the weatherization job.

## Target Market or Segment (MFR II.a.ii)

The target market for this program will be all residential customers who meet income qualification thresholds and live in single-family homes in the ACE territory. The income qualification will require household income between 250 and $400 \%$ of the Federal Income Poverty Level. Eligibility for these enhanced incentives can be determined based on screening an individual customer but the utilities also intend to explore implementing automatic eligibility for enhanced incentives based upon a physical location (e.g. census tract, environmental justice community, Urban Enterprise Zone) or based upon participation in a qualifying program (e.g. PAGE assistance program) to encourage more energy efficiency participation in LMI communities.

## Marketing Plan (MFR II.a.xiv)

This program will be marketed through multiple channels to ensure that different types of incomeeligible customers will be aware and participate in the program. Some of these methods will include social media, online advertising, and online marketplaces. ACE service territory has a high density of senior citizens who are less likely to engage in online marketing, and ACE will also market these programs through traditional channels including print advertising, bill inserts, and hard copy materials. ACE will also use information from other programs like Residential Behavior and identify those customers who did not qualify for the Comfort Partners program but might be eligible for Moderate-Income Weatherization. Finally, utility customer service personnel will work to promote the subprogram and educate customers on energy efficiency and the programs available to assist them.

The primary market barriers that impact this program include:

- Initial Cost of Equipment and Weatherization: Customer who qualify for this program may encounter barriers identifying measures for installation and the upfront costs for weatherization and installation of efficient products. This program will mitigate this barrier by providing a no-cost audit and no-cost measures for qualified customers.
- Customer Awareness and Engagement: Customers may not be aware of the benefits of installing energy efficiency equipment, the ACE energy efficiency program offerings, and in particular may not be aware of no-cost income qualified programs. ACE will mitigate this barrier though customer marketing including promoting the benefits of participation in the energy efficiency programs and specifically promoting the income qualified offering.
- Awareness and Training: To meet the participation goals, sufficient qualified contractors must be available to undertake the work. The Utilities and/or their third-party implementation contractors will address this barrier by trying to recruit qualified contractors to participate in this subprogram, including pursuing initiatives that align with the Workforce Development Working Group strategies to include more local, underrepresented and disadvantaged workers.

ACE will seek to manage all barriers to program success through a commitment to applying best practices in program design, delivery, outreach, and marketing/advertising. ACE's established customer communication channels, data, and brand in the marketplace will all be leveraged to deliver best-practice programs that identify and confront market barriers on an ongoing basis. To the extent possible, ACE will cross-promote programs to spread awareness of the range of efficiency opportunities proposed in this plan.

## Implementation Plan, Delivery Method and Contractor Roles (MFR II.a.v) (MFR II.a.viii) (MFR.II.c)

ACE will oversee and manage this program. It will be delivered to customers using third-party implementation contractors. These contractors will receive qualified customer leads from ACE, or consideration will be given to contractors to generate leads through their own program marketing and outreach. Once engaged with a customer the contractor will schedule an in-home audit where energy efficiency opportunities will be identified and installed. The energy efficiency measures may include LED lighting, shower heads, aerators, smart strips, smart thermostats, insulation, air sealing, and duct sealing.

To select qualified third-party implementation contractors, ACE will prioritize criteria including but not limited to:

- Experience delivering similar programs or initiatives
- Resources and marketing strength
- Knowledge of the current marketplace
- Ability to educate and train contractors
- Cost
- The amount of business placed with minority, women, veteran and service-disabled veteran owned businesses ("MWVBEs").


## Existing and Proposed Incentives Ranges (MFR II.a.iii) (MFR II.a.iv)

The program includes a no-cost audit and $100 \%$ incentive on measures for income qualified customers. There will be up to $\$ 1,500$ in health and safety related costs. The limit for each individual customer is $\$ 7,500$. Customers will be required to provide income qualification and account information as part of the enrollment process.

## Customer Financing Options (MFR II.a.vi)

The program provides a no-cost audit and 100\% incentives, therefore no financing of project costs is necessary. Refer to Appendix C for the Customer Financing Options by Program.

## Customer Access to Current and Historic Energy Usage Data (MFR II.a.vii)

ACE customers will have access to extensive customer data and bill analysis tools through the MyAccount feature of online customer service. Up to one year of usage data is also available on customers' electric bills.

## Projected Participants (MFR II.a.ix) and Energy-savings (MFR II.a.x)

The table below summarizes the projected participation and savings associated with this program. All values are annual incremental totals, and do not incorporate savings achieved in prior years. A participant is defined as a completed job at a customer home in the context of the Moderate-Income Weatherization subprogram. Savings estimates are based on projected participation during each year of the forecast period.

Table 17. Moderate Income Weatherization Estimated Participation and Savings

| Metric | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Estimated Participants | 160 | 450 | 825 |
| Projected Net Annual Natural Gas Savings (therms) | 19,943 | 56,089 | 102,829 |
| Projected Net Lifetime Natural Gas Savings (therms) | 379,886 | $1,068,429$ | $1,958,786$ |
| Projected Net Lifetime Natural Gas Savings from <br> Qualifying Low-Income Customers (therms) | 379,886 | $1,068,429$ | $1,958,786$ |
| Projected Net Annual Electric Savings (kWh) | 293,049 | 824,199 | $1,511,032$ |
| Projected Net Lifetime Electric Savings (kWh) | $4,554,307$ | $12,808,989$ | $23,483,146$ |
| Projected Net Lifetime Electric Savings from Qualifying <br> Low-Income Customers (kWh) | $4,554,307$ | $12,808,989$ | $23,483,146$ |
| Projected Net Annual Peak Demand Savings (kW) | 6 | 17 | 31 |
| Projected Net Lifetime Peak Demand Savings (kW) | 111 | 311 | 571 |

For customers in areas where gas and electric service territories overlap, the utilities will use the Program Coordinator to allocate costs and energy-savings for shared measures. Refer to Section 10 for a description of the role of the Program Coordinator.

## Program Budget (MFR II a.xi) (MFR II.a.xii)

The table below summarizes the projected participation and savings associated with this subprogram. All values are annual incremental totals, and do not incorporate savings achieved in prior years. Savings estimates are based on projected participation during each year of the forecast period.

Table 18. Moderate Income Weatherization Estimated Program Expenditures by Cost Category and Year (\$)

| Cost Category | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Capital Cost | 0 | 0 | 0 |
| Utility Administration | 129,897 | 337,690 | 568,418 |
| Marketing | 32,291 | 90,818 | 166,501 |
| Outside Services | 127,057 | 320,270 | 519,185 |
| Incentives-rebates and other | $1,201,891$ | $3,380,319$ | $6,197,252$ |
| Incentives-financing | 0 | 0 | 0 |
| Inspections and Quality Control | 14,433 | 37,521 | 63,158 |
| Evaluation | 25,370 | 71,353 | 130,813 |
| Total | $\mathbf{1 , 5 3 0 , 9 3 9}$ | $\mathbf{4 , 2 3 7 , 9 7 2}$ | $\mathbf{7 , 6 4 5 , 3 2 6}$ |

### 3.2.4 Energy Solutions for Business: Engineered Solutions

The C\&I Engineered Solutions Program will provide tailored energy efficiency assistance to public service entities, such as municipalities, universities, schools, hospitals and other healthcare facilities, non-profit entities and multi-family facilities. The program will provide expert-guided service throughout delivery to assist customers in identifying and undertaking large energy efficiency projects on site, while requiring no up-front funding from the customer.

Through this program, customers will be provided with an in-depth facility audit as well as a detailed assessment and recommendation of cost-effective energy efficiency measures. Customer incentives will be determined on a project-by-project basis (described in greater detail below), and participants may select their preferred installation vendors. In addition to the calculated project-by-project incentive, participants will have the option to pay back the non-incentive portion of the project costs with interest-free financing. Through this approach, participants in market segments that have typically been underserved are able to achieve greater energy-savings.

## Target Market or Segment (MFR II.a.ii)

C\&I public sector municipalities, universities, schools, hospitals, non-profit, multi-family entities, medical and educational facilities located within ACE service territory are eligible to participate in this program. The program will provide energy audits and incentives to entities that directly serve the public but often have difficultly investing in energy efficiency. The measures in this program may include HVAC, building envelope, motors, lighting, controls, energy storage, and other energy consuming equipment.

## Marketing Plan (MFR II.a.xiv)

ACE will leverage existing relationships with municipalities, universities, schools, and other public agencies to promote the program and will conduct further outreach through school, university, and municipal associations. In addition, ACE will work with hospitals, healthcare facilities, non-profits, and multi-family agencies to increase awareness of the program. The program will leverage ACE's existing relationships and communication channels with customers and seek decision-makers within the institutions to ensure faster project scoping and authorization.

The primary market barriers that impact this program include:

- Business/Operational Constraints: Municipalities, universities, schools and hospital facilities often have unique operational constraints that act as a barrier to efficiency projects from being implemented. This barrier will be addressed by ensuring that the program operates cooperatively with participants, provides technical assistance, and offers timely incentives and financing support.
- Customer Awareness and Engagement: Eligible participants in the municipalities, universities, schools, and hospitals ("MUSH") market may be unaware of energy efficiency opportunities and programs because the segment has historically not been well served by traditional DSM programs. To address this barrier, this program was designed specifically to support the MUSH segment. ACE will execute a targeted outreach strategy to ensure that relevant customers are aware of program opportunities and consider energy efficiency
in equipment investments and long-term planning. The program will also prepare and distribute successful case studies of prior participants and their experiences and energysavings.
- Cost Effectiveness: Efficiency upgrades require an initial investment that is recovered by lower long-run operating costs and non-energy benefits. MUSH projects often carry longer payback periods than traditional DSM projects due to the unique needs of the segment (e.g. hospital \& health buildings). To address this barrier, incentives and on-bill repayment is provided to the customer to reduce the initial cost, and ACE will endeavor to communicate the non-energy benefits offered by many efficiency upgrades that are not well captured in traditional cost/benefit analysis.

ACE will seek to manage all barriers to program success through a commitment to applying best practices in program design, delivery, outreach, and marketing/advertising. ACE's established customer communication channels, data, and brand in the marketplace will all be leveraged to deliver best-practice programs that identify and confront market barriers on an ongoing basis. To the extent possible, ACE will cross-promote programs to spread awareness of the range of efficiency opportunities proposed in this plan.

## Implementation Plan, Delivery Method and Contractor Roles (MFR II.a.viii) (MFR II.a.v) (MFR II.a.viii) (MFR.II.c)

ACE will serve as the program administer and will seek a third-party implementation contractor to deliver the Engineered Solutions program. The implementation contractor will develop the program protocols and standards and will recruit and train auditing and engineering firms to complete the energy efficiency projects per program requirements. The implementation contractor will also develop the marketing plan and materials to recruit customers to the program. As these projects are large-scale, a professional business development team will seek customers at C-suite levels in order to successfully scope and authorize the projects.

ACE will retain qualified vendors to undertake the audit and engineering services required to deliver this program. Participants will contract with preferred installation trade allies to install the measures included in projects.

The program delivery will typically occur in four steps:

- Audit: ACE or its selected third-party implementation contractor shall assess the required level of American Society of Heating, Refrigerating, and Air Conditioning Engineers (ASHRAE) audit to perform based on the complexity of the facility and the potential energy efficiency measures; an investment grade audit may not be required for all facilities. The selected ACE vendor then will perform the appropriate level energy audit and prepare a customized audit report that includes a list of recommended energy efficiency upgrades. ACE and its representatives will review the recommended energy efficiency upgrades with the customer to determine whether to proceed with a project.
- Engineering Analysis of Project: Based on the audit results, an engineering analysis may be required. ACE will conduct a screening of the payback and project cost effectiveness and select a set of approved energy efficiency measures for the project. The program
engineering vendor will prepare bid-ready documents and work with the participant to prepare a project Scope of Work, which will be used by the customer to obtain installation cost estimates for project.
- Scope of Work/Contractor Bids: The participant will issue a Scope of Work to obtain bids to complete the identified and approved project. ACE, the program engineering vendor, and the participant will review and evaluate the bids/costs received and make the final decision on bid selection. Following bid selection, the proposed project is again screened for cost effectiveness and the participant is presented a funding commitment proposal from ACE. Once (i) the participant and ACE have executed the funding commitment and (ii) the installation contractor and the participant have executed applicable agreements and contracts, the first progress payment equal to approximately $30 \%$ of the installation cost can be issued to the customer to initiate the project (Stage 1 Progress Payment).
- Measures Installation and Inspections: ACE, its representatives, and the energy engineering vendor, acting as construction administration agent, will monitor project progress. Upon verification of satisfactory project progress, a series of Stage 2 progress payments up to $50 \%$ of total project commitment can be issued. When the project is $100 \%$ complete, a final project true-up, and final inspection will be undertaken. The final payment based on the results of project true-up is determined and issued only if the final inspection is successfully completed and approved. If the final costs are less than the estimated project commitment, the final payment will be adjusted down to reflect the actual costs. If the final costs are greater than the estimated project commitment, the final payment will not be adjusted and will be paid according to the executed agreements and contracts specifying original costs.

The progress payment schedule described above is designed to ensure that building owners can pay their contractors on a timely basis. Project progress and the project cash flow will be monitored and verified by ACE or a designated third-party implementation contractor.

By allowing participants to select a trade ally they are comfortable with for select products (either through an existing relationship or by reference from ACE), the program reduces barriers to entry related to knowledge of energy efficiency, confidence in assessments, and measure installation. ACE will perform customer satisfaction and other quality assurance and quality control activities to monitor, ensure program and verify quality standards are met.

ACE will select qualified program participating vendors to undertake all auditing and engineering work associated with the program. Participants are permitted to select their preferred installation contractors to complete work on site. ACE may also take on a third-party implementation contractor to assist in the outreach, marketing, and trade ally coordination, to support the large number of municipalities and schools within the ACE service territory. Installation contractors, as selected by the participants, must adhere to the project specifications as developed by ACE and the engineering vendor, and as approved by the participant. ACE will leverage trade allies to support the program, including local construction, electrical, plumbing, and other contractors to educate them on program benefits and assist with building a network of trade allies which will reliably install energy-efficient equipment for participating customers. The third-party implementation contractor may also monitor participation to assess the effectiveness of outreach
efforts, incentive levels, delivery methods, and trade ally availability to provide suggestions to assure that the program is continually providing ACE customers with their needs.

To select a qualified third-party implementation contractor, ACE will prioritize criteria including but not limited to:

- Experience delivering similar programs or initiatives
- Resources and marketing strength
- Knowledge of the current marketplace
- Ability to educate and train contractors
- Cost
- The amount of business placed with minority, women, veteran and service-disabled veteran owned businesses ("MWVBEs").

ACE's service territory overlaps with South Jersey Gas (SJG), and there will be coordination between the utilities for customer projects that span both service territories. For customers that are served by both ACE and SJG, ACE will take the lead in coordinating the audit with a contractor common to both utilities. The measures selected for the project will determine which utility takes the lead role with the customer; if the measures are predominately gas, SJG will take the lead, and if the measures are predominately electric, ACE will lead. Both utilities will be part of the measure selection, engineering analysis, and final inspection of the project. Savings will be allocated by fuel based on the projected energy-savings of the project. Each utility will be responsible for providing incentives for their respective fuel, and costs will be split in proportion to savings on a MMBtu basis, or as negotiated by the utilities per project.

## Existing and Proposed Incentives Ranges (MFR II.a.iii) (MFR II.a.iv)

The program will provide a 100\% incentive for an up-front ASHRAE Level I, II, or III audit, the specific audit level to be determined based upon the type, size, and age of the facility. In addition, ACE will buy-down the simple payback of the recommended energy efficiency project cost for approved measures by up to six years, with the resulting payback not less than three years. After the project incentive buy-down, the remaining project costs may be funded by the program with participants repaying the balance of the project costs interest-free over time.

ACE will retain the option and flexibility to adjust the incentive offered to participants to enable a whole-building approach that will include additional energy efficiency measures in the project.

The full cost of the energy efficiency projects (including engineering, transaction costs and cost of construction) will be covered through a combination of program incentive and customer repayments.

## Customer Financing Options (MFR II.a.vi)

ACE will provide interest free on-bill repayment for customers to repay the non-incentive portion of the project over time.

Refer to Appendix C for the Customer Financing Options by Program.

## Customer Access to Current and Historic Energy Usage Data (MFR II.a.vii)

ACE customers will have access to extensive customer data and bill analysis tools through the MyAccount feature of online customer service. Up to one year of usage data is also available on customers’ electric bills.

## Projected Participants (MFR II.a.ix) and Energy-savings (MFR II.a.x)

The table below summarizes the projected participation and savings associated with this subprogram. All values are annual incremental totals, and do not incorporate savings achieved in prior years. Savings estimates are based on projected participation during each year of the forecast period.

Table 19. Engineered Solutions Program Estimated Participation and Savings

| Metric | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Estimated Participants | 0 | 1 | 1 |
| Projected Net Annual Natural Gas Savings (therms) | 0 | 43,918 | 87,836 |
| Projected Net Lifetime Natural Gas Savings (therms) | 0 | 878,361 | $1,756,721$ |
| Projected Net Annual Electric Savings (kWh) | 0 | 607,879 | $1,215,757$ |
| Projected Net Lifetime Electric Savings (kWh) | 0 | $12,157,575$ | $24,315,150$ |
| Projected Net Annual Peak Demand Savings (kW) | 0 | 17 | 34 |
| Projected Net Lifetime Peak Demand Savings (kW) | 0 | 337 | 675 |

*Represents all savings from lead utility projects

## Program Budget (MFR II a.xi) (MFR II.a.xii)

The following table provides the subprogram budget broken down by the following categories: capital cost; utility administration; marketing; outside services; incentives (including rebates and low- or no- interest loans); inspections and quality control; and evaluation.

Table 20. Engineered Solutions Estimated Program Expenditures by Cost Category and Year (\$)

| Cost Category | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Capital Cost | 0 | 0 | 0 |
| Utility Administration | 43,391 | 346,075 | 389,467 |
| Marketing | 9,721 | 77,532 | 87,253 |
| Outside Services | 5,041 | 40,206 | 45,247 |
| Incentives-rebates and other | 75,781 | 604,400 | 680,181 |


| Incentives-financing | 0 | 75,025 | 150,049 |
| :--- | ---: | ---: | ---: |
| Inspections and Quality Control | 4,821 | 38,453 | 43,274 |
| Evaluation | 1,600 | 14,341 | 17,525 |
| Total | $\mathbf{1 4 0 , 3 5 5}$ | $\mathbf{1 , 1 9 6 , 0 3 2}$ | $\mathbf{1 , 4 1 2 , 9 9 5}$ |

### 3.2.5 Energy Solutions for Business: Energy Management

The Energy Management program from ACE includes four offerings to assist C\&I mid-size and large customers tune up their building equipment and use energy more productively. These offerings are designed to capitalize on operational saving opportunities, no- and low-cost energy efficiency measures and identify opportunities for energy productivity savings. Customers can make changes to their HVAC, building automation, controls, industrial processes and electrical systems through offerings that include ${ }^{12}$ :

- Unitary HVAC Tune-up - Over time HVAC units can go out of tune from their original factory settings. Sometimes this can be due to set points being changed and not changed back, or from normal operations The unitary HVAC offering focuses on retuning equipment and returning it to its proper operational state. The focus of this program is on no- and low-cost measures, reducing future maintenance and repair costs, and saving energy for the customer.
- Full Building Tune-up - When buildings are constructed, they generally go through a commissioning process to ensure that all equipment is operating as designed. The full building tune-up is a retrocommissioning ( RCx ) program designed to retune equipment across the entire building and identify no-cost measures and energy efficiency projects for customers.
- Monitoring Based Commissioning (MBCx) - MBCx is focused on monitoring the equipment in a building over a specific period of time to identify when equipment is not operating as expected and to make changes based on data. This allows customers to maximize the operational efficiency of the facility and associated equipment, while benefiting from a continuous process to improve comfort and optimize energy usage.
- Strategic Energy Management (SEM) ${ }^{13}$ - SEM is a unique offering best suited for larger customers. In this contractor delivered program, cohorts of approximately 10 customers are recruited to gather regularly to learn about efficiency opportunities and make recommendations on energy efficiency projects. These behavioral and project savings will lead to increased energy productivity (energy per unit of production) for customers as measured through computer modeling. This high-engagement approach strengthens the relationship between the customer and ACE and leads to long term savings for companies.
Each of these offerings will be delivered by pre-qualified contractors and will help ACE customers use their electricity more efficiently and productively. These offerings will be marketed to all mid and large customers, with larger customers being the focus of SEM program recruitment.


## Target Market or Segment (MFR II.a.ii)

The Energy Management program is the best fit for mid-size and large customers who have dedicated staff overseeing energy use. The segments that will be targeted by this offering include:

[^43]- Municipal, University, School and Hospital (MUSH) market
- Large customers (particularly for SEM)
- Supermarkets, restaurants, food service and others with refrigeration needs
- Manufacturers, especially those with Industrial process
- Office buildings, including medical office buildings
- Entertainment
- Lab spaces
- Hotels
- Warehouse

Multiple building systems and equipment will be targeted by the Energy Management offerings including:

- HAVC systems including chillers, roof top units (RTU), and other mechanical systems
- Compressed air systems
- Building management systems
- Building controls
- Electrical systems
- Industrial processes

SEM will target these same building systems, but SEM also targets customer behavior and energy productivity of industrial processes. SEM is a holistic approach to a building and operations, and it is important to have buy in from senior management as well as all employees. By using regression modeling things like behavior changes can be quantified and be part of savings calculations and incentives. Additionally, customers are urged to make changes to manufacturing processes and find ways to increase energy productivity, or amount of energy per unit of production.

## Marketing Plan (MFR II.a.xiv)

The Energy Management program will be focused on serving mid-size and large customers, and the marketing will reflect this focus. Additionally, contractors will need to be made aware of the program, and there will be a marketing effort focused on them as well.
Marketing pathways to mid-size and large customers will include:

- Email marketing
- Direct mail to energy and facility managers
- Sharing case studies of successful projects
- Displaying at events and conferences
- Leveraging existing relationships
- Account Management outreach
- Webinars

Marketing to contractors will include:

- Trade ally trainings
- Meetings with trade associations
- Direct mail
- Email marketing
- Webinars

The primary market barriers that impact this program include:

- Customer Awareness of Programs: Customers may simply not be aware of the programs, and if they are, they may not be aware of the types of projects and equipment that is incentivized. This barrier will be addressed through program marketing and training of contractors to explain program offerings and its benefits to customers.
- Customer Resources: Customers may not have the resources to implement these Energy Management programs or provide the time needed for participation and monitoring in the MBCx and SEM programs. To address this barrier, customers will be made aware of the benefits of energy efficiency projects in general and specifically in the advantages of extending the life of existing equipment to reduce operational and capital costs. Further, in the SEM program, there is a need for buy in from senior levels of management and this will ensure that company personnel dedicated to SEM will be available for trainings and other cohort meetings.
- Approval of Decision Makers: Decision makers, such a chief financial officer, may be more focused on larger costs such as employee salaries and health insurance than energysavings. While reducing energy costs can have a much larger impact than a similar amount of new revenue ${ }^{14}$, it can be difficult to schedule meetings with CFOs and then have energy management staff make the business case for efficiency upgrades. SEM in particular needs buy in at all levels of a company from facility managers to the C-suite. To address this barrier, ACE will provide information to energy managers and other customer representatives that make the business case for energy efficiency projects. For example, energy costs come out of business operating expenses and the company would need to generate significantly more revenue to match the same savings; energy-savings has a much bigger impact on the bottom line than a commensurate amount of sales or revenue. This can be a motivating factor for the CFO to focus on energy-savings.
- Customer targeting and outreach: It is challenging to identify and recruit customers into Energy Management programs, and SEM in particular. It is important for contractors to have specific customer segments and other leads to pursue. To address this barrier, ACE will work with contractors and its account managers to identify customers that would be the best fir for each program path. Contractors will be urged to reach out to certain customer segments and will be given lists of customers as leads for outreach.

ACE will seek to manage all barriers to program success through a commitment to applying best practices in program design, delivery, outreach, and marketing/advertising. The ACE established customer communication channels, data, and brand in the marketplace will all be leveraged to deliver best-practice programs that identify and confront market barriers on an ongoing basis. To the extent possible, ACE will cross-promote programs to spread awareness of the range of efficiency opportunities proposed in this plan.

## Implementation Plan, Delivery Method and Contractor Roles (MFR II.a.viii) (MFR II.a.v) (MFR II.a.viii) (MFR.II.c)

[^44]Equipment and systems that will be targeted in the Energy Management program include: ${ }^{15}$

- HVAC systems including chillers, roof top units (RTU), and other mechanical systems
- Compressed air systems
- Building management systems
- Building controls
- Electrical systems
- Industrial processes

All offerings under the Energy Management program will be delivered by contractors. These contractors will receive qualified leads from ACE and will also be able to solicit customers on their own. Once a customer is enrolled in the program and working with an approved contractor, the offerings will be implemented in unique ways:

- Unitary HVAC Tune-up - Contractors will visit the site and identify any HVAC equipment that could benefit from program engagement including chillers, roof top units, and refrigeration equipment. The equipment will undergo inspection and troubleshooting and be adjusted to operate at optimal efficiency levels. Examples of tune up items are filter replacements, set point adjustments, coil cleaning, leak repair and others. The site visit will be conducted free of charge and prescriptive incentives will be paid to the customer based on the nature of the equipment tune up items installed.
- Full Building Tune-up - This multi-step process begins with an approved contractor being chosen to do a full building study that will assess the mechanical, controls, and electrical systems through the building. This study will be paid for by ACE with a commitment from the customer that all items with an 18-month payback or less will be implemented or else the customer is responsible for the cost of the study; any measures with over a 18-month payback will be eligible to participate in the Existing Buildings program. The customer and its contractor will make equipment adjustments and install measures to realize the energy-savings.
- Monitoring Based Commissioning (MBCx) - The process with MBCx is similar to the full building tune up in that an approved contractor is selected and a study is done on the whole building. Where it begins to differ it that monitoring equipment is installed that measures and verifies the performance of building systems. The building equipment is monitored over an 18 -month period. With this data logging and real time data analytics in hand the buildings performance is run through a number of simulations and optimal measures are proposed. After measures are proposed, customers are paid on a kWh saved basis, and customers have a building that is more responsive to their energy use needs.
- Strategic Energy Management (SEM) ${ }^{\mathbf{1 6 1 7}}$ - SEM takes a holistic approach to addressing ways to save energy in buildings. SEM is delivered by a contractor working hand in hand with a cohort of customers. These customer cohorts will meet regularly to learn about energy management practices, as well as review each other facilities. The first

[^45]step in a customer's process with SEM is to undertake a self-assessment to determine the current energy management practices and what data is currently available at the facility. The next step requires development of a breakdown of all energy uses in a facility and then set a baseline of the energy usage in the facility. Then begins a regular cycle of energy-saving activities outlined by plan, do, check, act.
o Plan: set goals for energy performance and a plan to meet these goals
o Do: Implement energy-savings measures and strategies
o Check: Ensure the strategies are being implemented and the plan is working
o Act: Continue to make changes and start the process again
One of the ways to measure energy performance is to use a regression computer model which will disaggregate other variables from the model and show how the building is performing compared to a counterfactual baseline. The savings are determined against this baseline and payments are made. The final step in the process is regular reporting to company management and other stakeholders so they are aware of the energy-savings from the SEM program.

ACE will have ultimate oversight of the program and act as the Program Manager. In this capacity, ACE will oversee the overall implementation of the program including approval of projects, marketing, RFQ/RFP development and evaluation, data collection, and issuing of incentives.

Each of the individual engagement paths will be delivered by contractors and the contractors will be responsible for marketing their particular services, seeking approval for projects from ACE, implementing projects, reporting savings and other metrics to ACE and other tasks as assigned. The paths will have different needs for contractors and will be managed as follows:

- Unitary HVAC Tune-up - ACE will have a rolling Request for Qualifications (RFQ) for HVAC and retrocommissioning contractors to deliver these tune ups. Since these tune ups are focused on singular pieces of equipment, the contractors will not need to have expertise to deliver savings on multiple building systems.
- Full Building Tune-up - A RFQ will be issued to RCx contractors who are qualified to review all building systems including building management systems (BMS). These contractors will work to identify opportunities for no-cost savings by bringing buildings back in line with their original operating specifications. RCx providers will also identify failed equipment and other potential energy efficiency projects that will save more energy for the customer.
- Monitoring Based Commissioning (MBCx) - A RFQ will be issued for RCx providers who have a specialty in installing monitoring software and providing RCx services. MBCx requires a longer period of engagement and can identify savings opportunities at different time of the year based on equipment usage.
- Strategic Energy Management (SEM) - A Request for Proposals (RFP) will be issued for a single SEM provider for ACE territory. This provider will work with ACE to identify ideal customer participants and work to recruit cohorts of customers. These cohorts can come from related industries as well as similar sized industries; based on
what is the best fit for the customer base. The SEM provider will be responsible for developing cohort curricula, running on-site workshops, working with individual customers, and overseeing energy modeling.


## Existing and Proposed Incentives Ranges (MFR II.a.iii) (MFR II.a.iv)

The incentives for the existing building program will be a combination of reducing up-front costs for participation, incentives from the existing buildings program, and payments per kWh saved. Each offering will have a different approach as follows:

- Unitary HVAC Tune-up ${ }^{\mathbf{1 8}}$ - ACE will pay $100 \%$ of up-front project audits, and provide a prescriptive incentive for low-cost measures completed by the contractor.
- Full Building Tune-up ${ }^{19}$ - ACE will pay for $100 \%$ of costs associated with the full audit that will identify projects and no-cost of low-cost savings opportunities. As a condition of this incentive, customers will need to commit to installing all measures that have less than an 18-month payback, or else they will be responsible for the study cost. Existing Buildings incentives will be available to projects above this 18-month threshold.
- Monitoring Based Commissioning (MBCx) - MBCx is a data-driven commissioning process designed to resolve operating issues, improve comfort, and optimize energy use in existing buildings by using monitoring equipment that measures and verifies electrical consumption over an 18 -month period. Incentives are paid on a $\$ / \mathrm{kWh}$ saved basis for conditioned spaces, and also include additional incentives for ASHRAE Level 2 audits that have detailed analysis of potential ECMs, savings, and overall project scope.
- Strategic Energy Management (SEM) - SEM determines a counterfactual baseline and uses regression energy modeling to measure savings. Operations and maintenance savings against this baseline will be paid an incentive of $\$ 0.02$ per $\mathrm{kWh}^{20}$. Energy projects that require installation of equipment will be eligible for incentives from the Existing Buildings program.


## Customer Financing Options (MFR II.a.vi)

Refer to Appendix C for the Customer Financing Options by Program.

## Customer Access to Current and Historic Energy Usage Data (MFR II.a.vii)

ACE customers will have access to extensive customer data and bill analysis tools through the MyAccount feature of online customer service. Up to one year of usage data is also available on customers’ electric bills.

## Projected Participants (MFR II.a.ix) and Energy-savings (MFR II.a.x)

[^46]The table below summarizes the projected participation and savings associated with this subprogram. All values are annual incremental totals, and do not incorporate savings achieved in prior years. Savings estimates are based on projected participation during each year of the forecast period.

Table 21. Energy Management Estimated Participation and Savings

| Metric | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Estimated Participants | 25 | 25 | 130 |
| Projected Net Annual Natural Gas Savings (therms) | 0 | 0 | 0 |
| Projected Net Lifetime Natural Gas Savings (therms) | 0 | 0 | 0 |
| Projected Net Lifetime Natural Gas Savings from <br> Qualifying Small Commercial Customers (therms) | 0 | 0 | 0 |
| Projected Net Annual Electric Savings (kWh) | 800,526 | 800,526 | $4,162,734$ |
| Projected Net Lifetime Electric Savings (kWh) | $4,002,629$ | $4,002,629$ | $20,813,669$ |
| Projected Net Lifetime Electric Savings from <br> Qualifying Small Commercial Customers (kWh) | 0 | 0 | 0 |
| Projected Net Annual Peak Demand Savings (kW) | 13 | 13 | 70 |
| Projected Net Lifetime Peak Demand Savings (kW) | 67 | 67 | 348 |

* ACE expects small business customer participation in this program but did not estimate for the purposes of this table.


## Program Budget (MFR II a.xi) (MFR II.a.xii)

The following table provides the subprogram budget broken down by the following categories: capital cost; utility administration; marketing; outside services; incentives (including rebates and low- or no- interest loans); inspections and quality control; and evaluation.

Table 22. Energy Management Program Estimated Program Expenditures by Cost Category and Year (\$)

| Cost Category | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Capital Cost | 0 | 0 | 0 |
| Utility Administration | 7,087 | 5,933 | 24,844 |
| Marketing | 101,113 | 88,846 | 398,211 |
| Outside Services | 103,339 | 96,934 | 470,756 |
| Incentives-rebates and other | 98,599 | 98,599 | 512,712 |
| Incentives-financing | 0 | 0 | 0 |


| Inspections and Quality Control | 787 | 659 | 2,760 |
| :--- | ---: | ---: | ---: |
| Evaluation | 3,674 | 2,998 | 12,072 |
| Total | $\mathbf{3 1 4 , 5 9 9}$ | $\mathbf{2 9 3 , 9 6 8}$ | $\mathbf{1 , 4 2 1 , 3 5 6}$ |

# 4 DATA PROTECTION, CUSTOMER QUALITY CONTROL, AND REMEDIATION POLICIES 

### 4.1 Data Protection and Security

Customer data is of the utmost importance to ACE and is crucial to maintain the confidence of the customers we serve. As Company practice, customers calling any of our service lines are asked to verify personal identification information and representatives do not proceed with a call if the information is not provided. Record of the call is logged in customer service record systems and is available for future reference.

Any transactions conducted via Company websites occur only over a secure Internet connection, or https. All customer records are password protected and are required to be strong passwords.

Exelon IT actively maintains and manages servers, hosting applications, and constantly monitors all systems for viruses and other virtual threats. IT patches and updates are tested and installed on a regular schedule. Further, all servers and applications are monitored on a $24 \times 7$ proactive basis. The Company also regularly conducts a self-testing process for vulnerability assessments.

In the event of a security breach, the Company will immediately escalate the matter to senior IT management, and ACE and Exelon leadership. The breach will be identified, assessed, and appropriate measures will be taken to identify harm to the Company and customers. Customers will be notified when the breach occurred and of protective measures offer by the Company to protect against any personal damages realized or going forward.

Through Exelon Sourcing, ACE seeks and confirms compliance with these standards from any implementation contractor. A thorough review of the contractor's internal systems and processes, from an IT architecture and data protection perspective, is conducted by Exelon IT before any customer information or data is transferred between the companies.

### 4.2 Customer Quality Control Standards and Remediation Policies

The quality control ("QC") process will be unique to each program and dependent on the level of customer engagement, delivery mechanism, need for contractor support, and other program delivery factors that may warrant consistent monitoring and review. For some programs, the QC process will be managed by the Company and in other cases the Company will require the implementation contractor delivering the program to develop a QC and remediation process for specific program requirements.
In general, any QC procedure will be set in place by the Company or the implementation contractor to validate the products or projects submitted to the program and ensure proper savings predictions and rebate payments. A desk review, often conducted by confirming customers’ personal identifiable information as submitted in any program application, is completed for all programs to ensure eligibility and that duplicate applications have not been received. Products to be rebated will be checked for eligibility and accurate rebate amounts.

Any energy efficiency projects may be inspected. During these inspections, field technicians will collect data points that directly impact the energy performance of the project and of the contractor completing the work. In some cases, the contractor may be cited for non-compliance with program requirements or for under-performing or poor-quality work. Repeated offenses may be cause for removal from the program as a participating contractor.

Customers may also provide direct feedback to the program via customer satisfaction survey or may be called or emailed directly and asked for program feedback. Customer representatives will record and monitor this information seeking trends in positive or negative customer experiences. This data will be analyzed and used in developing program enhancements and improvements.

While it is a rare occurrence, there are occasions when a customer issue is escalated. The Company or the implementation contractor will take responsibility for handling all customer questions and concerns professionally and in a timely fashion. Complaints of a serious nature or complaints that are not readily resolved will be reported to the program management team for immediate resolution. All information regarding customer feedback and complaints will be recorded and maintained in the program's data system and in the customer service record for the accountholder for future reference.

The Company or implementation contractor will have established telephone numbers, email addresses for customer communications regarding the program. In cases of emergency and if outside normal business hours, the customer will be advised to call ACE directly and the matter will be handled appropriately.

In very rare cases, the Company may need to seek remediation with an implementation contractor. These are handled case-by-case and per the terms of the contract. Exelon's Sourcing department manages its contracts with strict standards by which non-performance is handled. The contractor could be placed on a watch list, or if the matter is egregious, the contract can be terminated immediately.

## 5.WORKFORCE DEVELOPMENT AND JOB TRAINING (MFR II.b.ii.)

The utilities recognize the importance of developing and supporting Workforce Development Programs. A pool of qualified candidates is necessary for companies to meet the increased demand for the energy efficiency programs and to achieve the energy-saving targets established by the Clean Energy Act. This overview will address the Company's considerations for training needs and career paths, trade ally needs, and contracting provisions. However, the utilities are not including a detailed Workforce Development Plan for the Core Programs as part of this filing. The direction in the June $10^{\text {th }}$ Board Order is for the workforce development and job training partnerships and pipelines to be developed in collaboration with the State and the Workforce Development Working Group and Equity Working Group.

ACE is interested in being an active participant in the Workforce Development Working Group to share its anticipated program hiring needs and understand the interests, feedback and concerns of the other stakeholders. The utilities anticipate that this new work group will provide significant input that will shape the recommended programs and policies that will develop a robust pipeline of workers able to meet the needs of a growing energy efficiency industry in New Jersey and to ensure that local, underrepresented, and disadvantaged workers are included in those opportunities.

Further, ACE has existing partnerships and foundation support for its Workforce Development Initiative. This existing six-year $\$ 6.5$ million program can support EE-specific pathways for employment and job training to support the energy efficiency market.

Another pathway under ACE’s consideration is an Energy Efficiency Service Provider Incubator (EESPI) program to increase the number of diverse contractors approved by ACE to participate in New Jersey's service provider network. The incubator will train a cohort of diverse small and medium businesses to seek work, provide trained employees and staff to provide services for the State's energy efficiency programs and market.

Incubator participants will represent the diversity of ACE's customers. The program will leverage existing trusted partners and partnerships, workforce development nonprofits, and communitybased agencies to identify and engage diverse contractors that represent business sectors needed in the ACE service provider network. ACE's energy efficiency portfolio's Implementation Contractors will provide training and support to guide the participants through the programs details and how to succeed as a service provider in the energy efficiency market.

## Training Needs and Career Paths

In order for the utilities to reach the aggressive energy efficiency goals established by the Clean Energy Act, New Jersey will need to significantly increase the number of trained professionals and skilled trade persons who are proficient in meeting the needs of residential, commercial and multifamily projects, such as:

- Auditors
- HVAC technicians
- Plumbers
- Electricians
- Seal-up and insulation contractors
- Engineers
- Analysts (energy modeling and evaluation, customer service, financial tracking, cost benefit analysis, demographic analysis)
- Program staff with a strong understanding of the approved energy efficiency programs and supporting administrative staff
- Outreach Specialists

We recognize that these positions require a broad range of technical training and educational experience and that it is in our interest to partner with New Jersey based vocational institutions, community colleges, universities, community-based organizations, and non-profits. We anticipate that most of these entities will have some level of representation with either the Workforce Development Working Group or the Equity Working Group and look forward to hearing their input. We expect the discussion within those working groups will include insights from successful models in other states and other industries as well as efforts already underway in New Jersey. Accounting for recommendations from those groups and funding from either the State or what the utilities are reserving within these filings, we hope to start to launch programs in Spring of 2021.

## Trade Ally Needs

While ensuring there is trained staff available is a critical path, the utilities also recognize there must be a pool of employers interested in hiring these individuals. While the utilities will be hiring some individuals directly and will see strong interest from implementers and trade allies under direct contracts with the utilities, we recognize that we must also engage the open market to understand the needs of contractors and other firms. Organizations like the New Jersey Air Conditioning Contractors Association (NJACCA), the New Jersey Association of Plumbing, Heating, and Cooling Contractors (NJPHCC) and the New Jersey Association of Energy Engineers (NJAEE) provide industry leadership and guidance to energy businesses, and should be included in the Working Group to guide policies and program designs that will meet the needs of existing and new contractors.

With the equity lens in mind, we expect the Working Groups to also explore paths that can help Women and Minority Owned Businesses grow and thrive in the Clean Energy Economy. The potential for coaching or incubator programs could ensure that underrepresented individuals have a greater chance to share in management and ownership opportunities.

## Contracting Provisions

The utilities will be following internal procurement protocols for the services that will be secured to implement our programs. We are all willing to include the amount of business placed with minority, women, veteran and service-disabled veteran owned businesses ("MWVBEs") as part of our rating criteria when evaluating contract proposals.

## Budget Considerations for Workforce Development Programs

ACE is proposing a workforce development budget of $\$ 200,00$ per year for the three-year program cycle. These budgets were established to ensure that there is adequate funding to launch and
maintain programs during this initial triennial period. In the event that the State identifies adequate funding from other sources to support these types of programs, the utilities may be able to reduce their planned expenditures.

## 6. IMPLEMENTATION PLAN (MFR II.a.xiii)

The following section outlines a general and overarching implementation plans for all programs. The majority of programs' specific implementation and delivery information is detailed in each subprogram description above. This additional information covers implementation factors that will support all programs.

### 6.1 Program Administration

The Company will provide management, administration, and implementation of the programs through internal operations or under supervised support of third-party vendors. The program teams will monitor the following program data elements for each utility-administered program:

- Progress to goal
- Projects completed
- Energy-savings
- Customers served
- Budgets

The Company will also keep abreast of industry trends, market research, best practices from other New Jersey utilities and regions to consider possible enhancements to the programs and ensure best-quality program implementation and performance.

### 6.2 Marketing Collaboration

To support a consistent statewide approach for program marketing and to support statewide awareness of energy efficiency programs and efforts, the Company will collaborate with partnering utilities on marketing materials and broad customer-awareness language. The Company will also participate in and support efforts of the Board-Ordered Marketing Working Group to determine appropriate measures for joint and statewide marketing efforts.

### 6.3 Customer Service and Call Center

The Company is committed to delivering an exceptional customer service experience and will utilize telephone, Internet, mobile app, and other customer-facing tools to provide energy efficiency program customer support and service.
Listed below are the typical responsibilities of the customer support representatives:

- Handle inquiries related to the energy efficiency Programs
- Facilitate electronic or postal delivery of requested information
- Provide program application support and status updates
- Resolve issues or complaints.

Any customer complaints will be escalated to the appropriate department within the Company and handled through standard customer service practices.

### 6.4 IT, Data Tracking and Reporting

The Company or its third-party vendor will identify and implement appropriate IT systems to track and report program participation and energy-saving data. These systems will be in coordination with existing Company systems or built-out appropriately by the implementation contractor to meet the specific program tracking and regulatory reporting requirements. The systems will transmit data feeds with the Statewide Coordinator to facilitate data sharing between utilities for dual-fuel programs.

The IT systems capabilities will include, but is not limited to the following functions:

- Program monitoring reports
- Invoicing coordinating utilities and third-party vendors
- EM\&V data extracts
- Regulatory reporting extracts

Processes to ensure data quality and data security will be put in place and monitored on a routine basis to ensure program reporting accuracy and customer data protections.

### 6.5 Program Quality Assurance and Quality Control

The Company will deploy routine quality assurance and quality control measures to ensure its internal and vendor processes are meeting the goals and objectives of the program. Such measures may include routine program performance reviews, vendor meetings, customer participation surveys, and project inspections. Additionally, any Trade Ally or Participating Contractor will undergo a thorough onboarding review to ensure that participating contractors are licensed, insured, and that they fully understand program requirements before performing any work on behalf of the Company and program. Further, routine review periods to ensure consistent program deployment and execution. The Company will take corrective actions for non-compliance and conformance with program objectives or Company standards.

## 7.REPORTING PLAN (MFR II.b.VII. \& VII)

ACE appreciates the value in tracking program performance and progress towards the goals of the Clean Energy Act. In the vein, the Company will coordinate with the other New Jersey utilities and the EM\&V Working Group to develop a reporting template and process that meets the criteria described in the table below.

## Table 23. ACE EE Reporting Plan

| Report Name | Timing | Data Points | Narrative |
| :---: | :---: | :---: | :---: |
| Quarterly <br> Progress Report | Within 60 days of the end of the quarter, or by: December 1, March 1, June 1, September 1 | - Net Energy Savings <br> - Gross Energy Savings <br> - Count of program participants: <br> - Total <br> - Low-income <br> - Moderate-income <br> - Small commercial <br> - Program Expenditures | - Customer participation <br> - Incentives paid |
| Annual <br> Progress Report | Within 75 days of the end of the program year, or by September 15 | - Net Energy Savings <br> - Gross Energy Savings <br> - Count of program participants: <br> - Total <br> - Low-income <br> - Moderate-income <br> - Small commercial <br> - Program Expenditures <br> - Initial benefit-cost test (program and portfolio level) <br> - Final benefit-cost test (program and portfolio level) <br> - Performance towards/attainment of QPIs | - Customer participation <br> - Incentives paid <br> - Any proposed changes or additions for the next year or cycle |
| Triennial <br> Progress Report | Within 90 days of the end of the third program year, or by September 30 | All the data points below at the program and portfolio levels: <br> - Net Energy Savings <br> - Gross Energy Savings <br> - Count of program participants: <br> - Total <br> - Low-income <br> - Moderate-income <br> - Small commercial <br> - Program Expenditures <br> - Initial benefit-cost test <br> - Final benefit-cost test <br> - Performance towards/attainment of QPIs | - Customer participation <br> - Incentives paid <br> - Any proposed changes or additions for the next year or cycle |
| Evaluation Studies | With 365 days of the end of the third program year, or by July 1 | As determined by the scope of the impact evaluation and the EM\&V Working Group | As determined by the scope of the impact evaluation and the EM\&V Working Group |

## 8.ENERGY EFFICIENCY AS A RESOURCE

## PJM EE Potential Determination

The Company provided initial estimates of the PJM Summer and Winter MW EE potential for each PJM delivery year as shown in Appendix D.

These estimates were developed from the MWh savings modeled in the EE Plan, with the following additional assumptions and modifications.

- Identified and removed energy savings of all measures not eligible for PJM including:
o online audits
o appliance recycling
0 building lighting controls and occupancy sensors
o smart thermostats, energy management systems or smart homes
o behavioral programs
o educational programs
- Assumes utilities retain all Utility EE program Capacity Rights to support their offered EE resources and to ensure no double counting of EE resources by third parties
- Categorized all PJM eligible measures by PJM Program name
- Segregated EE Plan MWh estimates provided for NJ fiscal year (July-June) into the applicable PJM delivery year (June-May)
- Assigned an initial savings load shape to each PJM eligible EE measure
- Estimated the potential KW savings values for each measure for the PJM defined Summer and Winter periods using the appropriate load shape curve values including estimates for HVAC interactive factors and fuel type
- Included T \& D line losses to adjust retail kW values to wholesale kW values

The Capacity Performance potential kW would be the lesser of the Summer or Winter kW values by installation period.

## EE Offer Determination

The Board Order requires participation of EE Resources beginning with PY2 in the 2024/25 Base Residual Auction ("BRA"). All EE sell offer values and buy bids shall remain confidential as they are considered market sensitive information; however, they can be provided to BPU Staff via confidential submission and after the applicable auction results are available.

The Company proposes the following process to further evaluate the potential values provided in Appendix D to facilitate participation in the PJM Interconnection, L.L.C. ("PJM") Capacity Auctions. Adjustment of the PJM kW estimates for any Point of Sales (POS), Mid-Stream, and Up-Stream Programs. Measures from these programs require additional PJM EM\&V and annual
persistence studies to ensure offered EE measures are initially installed in the JCP\&L load zone and remain in service during each applicable delivery year.

- The Initial EE Plan values are based on many assumptions including adoption/installation rates, more generic or composite measure savings curve shapes, initial incentives or rebate levels, line losses and current measure baselines. Adjustments to each must be considered for EE offers and subsequent true up of positions.
- Adjustments to recognize that EE resources have a limited offer duration of four years with additional installation period limitations.

EE Offers need to consider Capacity Market rule changes like the pending PJM MOPR rules and Board's finalization of the Resource Adequacy activities. MOPR rules may necessitate the need for more aggressive BRA EE offers to ensure resources with significant floor prices clear vs. not clear an IA or if the Board authorizes the use of an FRR Alternative Auction for the EDCs, PJM Capacity Market EE Offers would not be applicable.

EE Offers are made in Installed Capacity ("ICAP") values but clear in Unforced Capacity ("UCAP") values based on PJM's Planning Parameters for each specific auction. The UCAP values that clear an auction will remain the obligation for the delivery year regardless of subsequent Incremental Auction parameter changes. True ups may be needed during incremental auctions or at a minimum the Third Incremental Auction when parameters become final, to either purchase any shortfall resources or possibly sell any excess resources.

## 9.ECONOMIC BENEFITS AND JOB CREATION

Energy efficiency programs create significant economic benefits to local and state economies. These benefits are created in several ways. First, utility spending on energy efficiency programs create direct jobs and drive economic growth through implementation and delivery of programs. Second, the customer bill savings produced by the programs drive significant economic growth because customers inject these dollars back into the economy. The positive benefits associated with the increased local spending driven by bill savings provide "ripple" effects through the economy creating jobs in many other sectors and boosting the local economy.

The economic benefits of the ACE proposed portfolio were estimated using IMPLAN, a widely recognized industry standard input/output model. IMPLAN estimates changes in the economy based on spending in specific industries. To properly model the economic impacts of energy efficiency programs, three separate components must be analyzed to provide a wholistic view. The three components include:

1. Direct spending from implementation of the programs;
2. Bill savings from customers participating in programs; and,
3. Increased rates driven by program cost recovery on customer bills.

While direct spending and bill savings both drive positive economic impacts, increased rates is a negative effect that decreased the value added to the economy. The calculation of economic impacts to New Jersey’s Gross Domestic Product ("GDP") is inclusive off all three of these factors. The table below summarizes the value added to New Jersey's GDP by subprogram.

Table 24: ACE Value-Added GDP by Program

| Subprogram | Value Added <br> to GDP (NPV) | Value Added <br> to GDP <br> (Nominal) |
| :--- | ---: | ---: |
| Home Energy Reports | 772,233 | 826,267 |
| Efficient Products | $46,369,588$ | $70,880,292$ |
| Existing Homes QHEC | $22,315,366$ | $34,403,667$ |
| Existing Homes HPwES | $6,126,438$ | $8,443,446$ |
| Moderate Income Weatherization | $10,054,771$ | $14,442,221$ |
| Multi-Family | $9,541,228$ | $15,993,084$ |
| Energy Solutions for Business: Prescriptive and Custom | $133,291,217$ | $249,295,296$ |
| Energy Solutions for Business: Engineered Solutions | $8,012,309$ | $20,378,958$ |
| Direct Install | $44,266,297$ | $75,474,767$ |
| Energy Solutions for Business: Energy Management | $7,906,449$ | $10,038,308$ |
| Portfolio Costs | $3,746,485$ | $4,191,365$ |
| Total | $292,402,381$ | $504,367,670$ |

Direct jobs are created through program implementation and administration. The jobs include program implementation staff, utility staff, trade allies, installers, and others. These jobs are created in many industries and sectors that span retail, construction, and other services. The sectors also employ people in manufacturing, construction, wholesale trade, professional building services, retail services, and other industries. These jobs, created by both utility spending and customer bill savings, drive indirect and induced job creation. Indirect jobs are those generated in the supply chain and supporting industries of an industry that is directly impacted by an expenditure. Induced jobs are those generated by the responding of received income resulting from direct and indirect job creation in the affected region. The indirect and induced jobs are created in many industries across the economy. The following table summarizes estimated job-year creation by program.

Table 25: Job-Year Creation by Program

| Subprogram | Direct Job- <br> year <br> Creation | Indirect + <br> Induced <br> Job-year <br> Creation | Total Job- <br> year <br> Creation |
| :--- | ---: | ---: | ---: |
| Home Energy Reports | 0 | 7 | $\mathbf{7}$ |
| Efficient Products | 138 | 649 | $\mathbf{7 8 7}$ |
| Existing Homes QHEC | 46 | 270 | $\mathbf{3 1 7}$ |
| Existing Homes HPwES | 82 | 81 | $\mathbf{1 6 3}$ |
| Moderate Income Weatherization | 61 | 64 | $\mathbf{1 2 5}$ |
| Multi-Family | 20 | 130 | $\mathbf{1 5 0}$ |
| Energy Solutions for Business: Prescriptive and <br> Custom | 1,831 | 1,473 | $\mathbf{3 , 3 0 4}$ |
| Energy Solutions for Business: Engineered Solutions | 108 | 98 | $\mathbf{2 0 6}$ |
| Direct Install | 508 | 398 | $\mathbf{9 0 6}$ |
| Energy Solutions for Business: Energy Management | 48 | 38 | $\mathbf{8 5}$ |
| Portfolio Costs | 17 | -5 | $\mathbf{1 2}$ |
| Total | $\mathbf{2 , 8 6 0}$ | $\mathbf{3 , 2 0 2}$ | $\mathbf{6 , 0 6 2}$ |

## 10. GAS AND ELECTRIC COORDINATION (MRF II.c)

A majority of ACE's customer base also receive gas service from one of New Jersey's four natural gas utilities. ACE's service territory primarily overlaps with South Jersey Gas ("SJG"), but also overlaps with PSE\&G and New Jersey Natural Gas (NJNG). For Core programs, electric and gas utilities will work together to coordinate offerings to customers to avoid market confusion. The coordination effort will seek to minimize duplicative or confusing messaging to customers and optimize marketing expenses. Program delivery specifics for Core or overlapping programs are discussed in detail in the specific program delivery sections above. The program and measure incentive levels for Core programs have also been extensively discussed with all New Jersey utilities to collaborate and offer uniform incentives throughout New Jersey.

For a program or specific project that is delivered by two utilities (gas and electric), a lead and partner utility will be established, generally based on customer acquisition, but also determined by the measures selected for the project. If the measures are predominately electric, then ACE will take the lead. If the measures are predominately gas, the gas company will take the lead. Savings will be allocated by fuel based on the projected energy savings of the project. Each utility will be responsible for funding incentives for their respective fuel, and costs will be split in proportion to savings on a MMBtu basis, or as negotiated by the utilities per project. The mechanics of this process will be further developed through the statewide coordinator tracking systems below.

The participation and energy savings presented throughout this plan are only for projects in which ACE will be the lead utility. ACE also expects gas utilities to complete projects in its service territory that produce electric savings. For these projects, ACE will serve as the partner utility and will fund all investments associated with the electric savings of those projects or measures. Likewise, for ACE programs that produce gas savings, ACE assumes all gas savings will be funded by the overlapping gas utility. The reconciliation of costs and savings will be handled by the statewide utility coordinator, with the intention that ACE customers will only be responsible to support costs related to the creation of electric savings, and natural gas customers to only pay for natural gas savings.

Due to the fact that ACE will be receiving payments from gas utilities for gas savings in projects it leads and sending payments to gas utilities for electric savings on projects it is supporting, ACE will require additional budget to cover these costs. This budget is estimated using expected gas savings from the ACE programs and expected electric savings for the overlapping utilities. The expected electric savings are less certain and out of ACE's control, so the budget estimate presented here is intended to provide an "as needed" budget for this process.

As such, the New Jersey investor-owned electric and gas utilities are collaborating in order to implement programs in a similar manner and develop supportive processes, such as consistent processes, procedures, requirements, and forms.

To support the coordinated delivery of certain programs, the Utilities have established a framework that will align key program elements through use of Interconnected Tracking Systems supported
by use of a Statewide Coordinator System, aligned Utility Responsibilities, and Coordinated Program Elements as further described below:

## Coordinated Program Offerings

To support the coordinated delivery of Core and certain Additional program offerings in situations that involve gas and electric savings opportunities in overlapping utility territories, the Utilities have established a framework that will align key program elements through use of Interconnected Tracking Systems supported by use of a Statewide Coordinator System, aligned Utility Responsibilities, and Coordinated Program Elements as further described below. This structure will support the coordinated delivery of appropriate energy efficiency measures in the following Program or Sub-program offerings:

## Core Offerings

- Energy Efficient Products
- Home Performance with ENERGY STAR
- Multi-Family
- Direct Install
- Prescriptive and Custom Measures


## Additional Utility-Led Offerings

- Moderate-Income Weatherization
- Quick Home Energy Check-Up
- Engineered Solutions
- Energy Management


## Interconnected Tracking Systems

To support consistency across the state and to align the above coordinated program offerings, the utilities will contract with a single third-party entity to serve as a Statewide Coordinator ("SWC") for measures and costs that impact more than one utility in situations where gas and electric service territories overlap. This entity, to be selected through a competitive procurement process, will provide a software platform to cross-reference eligible customers, identify the local gas and electric company serving the customer, identify completed and in-progress efficiency projects, and perform independent allocations of energy savings and costs for coordinated program offerings. These costs and savings will be allocated between the Utility that provides the program services (i.e. "Lead Utility") and the Utility with whom the services were coordinated (i.e. "Partner Utility’).
In areas where gas and electric service territories overlap, the utilities will design program elements that support consistent delivery of the above coordinated program offerings among all of the utilities to enable the SWC to allocate shared costs and energy savings appropriately based on the fuel types impacted by EE measures.

## Statewide Coordinator System Responsibilities

- Serve as a central platform to ensure data minimums required for coordinated data elements, exchange protocols, and serve as a repository for shared measure costs and shared savings for applicable programs.
- Track participation specific to utility programs that require coordination (e.g. screen prior participation in coordinated program offerings)
- Serve as a clearing house for pre-determined data formats and exchanges
- Perform allocation of dual-fuel or partner-fuel savings and cost for customers with separate gas and electric utilities, sharing of costs, investments, and applicable to customer financing
- Determine and provide supporting reports respective to utility invoice balances for allocation of shared measure costs (e.g. costs of respective measures and share of costs)
- Provide monthly reports of coordinated program activity so that customer participation and program results may be tracked


## Utility Responsibilities

The Utilities will implement certain program operations through either internal resources, or under contract with third-party implementation contractor(s) ("TPIC"), outside of the Statewide Coordinator system. By retaining these functions, the Utilities can maintain a strong line of sight to program operations and still work collaboratively with the other Utilities in offering coordinated programs to New Jersey customers. These functions include, where appropriate:

- Customer enrollment
- Developing consistent enrollment forms to collect agreed-upon customer information to share between the utilities
- Screening and qualifying contractors for Utility programs
- Customer care functions
- Marketing of programs
- Providing in-home/business auditing or direct-install of efficiency measures
- Communicating availability of customer financing options
- Integrating with other Utility or Co-managed programs
- Sponsoring EE program applications including paying initial incentives to customers and contractors
- Invoicing peer Utility partners for coordinated program costs


## Coordinated Program Elements

As envisioned by the Board's direction on coordinated program offerings, the Utilities' programs are designed in a way to minimize customer confusion and present consistent opportunities for customer participation with access to both electric and gas measures simultaneously, where appropriate. The utilities recognize that programs will evolve after initial launch and commit to ongoing collaborative efforts among the Utilities to continue program alignment. Central to both initial launch and ongoing efforts will be a focus by the Utilities to standardize the following wherever possible:

- Common forms for contractors and customers with uniform field requirements
- Contractor minimum requirements and credentials for applicable programs
- Eligible customers and property requirements
- Eligible measures
- Incentive structures through use of an agreed-upon standard range
- Software platforms or interfaces to be used by market contractors
- Targeted bonus approaches for customers that meet specific policy priorities (e.g. income qualified, targeted geographic locations,)


# 11. EVALUATION, MEASUREMENT \& VERIFICATION (MFR II.b.v) 

The utilities recognize the importance of incorporating Evaluation, Measurement and Verification ("EM\&V") into the energy efficiency programs. EM\&V can help assess whether program objectives are being achieved, document energy and non-energy benefits and inform future program development. This overview will address common definitions of the types of evaluations and primary evaluation objectives, the philosophy of monitoring and improving program performance, and EM\&V budget considerations. Proposed budgets for evaluation are reflected in Appendix B.

Further, the utilities are not including a detailed Evaluation Plan for the Core Programs as part of this filing because of the clear intention of the June $10^{\text {th }}$ Board Order for the evaluation plans to be developed in collaboration with the soon to be formed EM\&V Working Group. All of the utilities are interested in being active participants in this EM\&V Work Group to share both program experiences and understand the interests and concerns of the other stakeholders. The utilities anticipate that this new EM\&V workgroup will provide significant input that will shape the slate of evaluation activities for this first triennial program cycle. Further, we expect that there will be a robust discussion of which types of evaluations make the most sense in the early stages of this transition. Accordingly, the utilities did not want to prejudge the outcome of the EM\&V work group efforts with our own recommendations, but we have included sufficient funding to support the anticipated evaluation work within our filing.

## Common Definitions and Objectives

The State and Local Energy Efficiency Action Network ("SEE Action") offers resources, discussion forums, and technical assistance to state and local policymakers as they seek to advance energy efficiency. Their Energy Efficiency Program Impact Evaluation Guide from December 2012 identified three primary objectives for evaluations.

- Document the benefits (i.e., impacts) of a program and determine whether the subject program (or portfolio of programs) met its goals
- Identify ways to improve current and future programs through determining why program-induced impacts occurred
- Support energy demand forecasting and resource planning by understanding the historical and future resource contributions of energy efficiency as compared to other energy resources.

That same guide provides the following standard categories of evaluations:

- Impact evaluations: assessments that determine and document the direct and indirect benefits of an energy efficiency program. Impact evaluation involves real-time and/or retrospective assessments of the performance and implementation of an efficiency program or portfolio of programs. Program benefits, or impacts, can include energy and demand savings and non-energy benefits (sometimes called co-benefits, with
examples being avoided emissions, and water savings). Impact evaluations can also include cost-effectiveness analyses aimed at identifying relative program costs and benefits of energy-efficiency as compared to other energy resources, including both demand- and supply-side options.
- Process evaluations: formative, systematic assessments of an energy-efficiency program from both a customer and program administrator viewpoint. They document program operations and identify and recommend improvements that are likely to increase the program's efficiency or effectiveness for acquiring energy-efficiency resources and improve the customer experience with the program.
- Market evaluations: assessments of structure or functioning of a market, the behavior of market participants, and/or market changes that result from one or more program efforts. Market evaluation studies may include estimates of the current market role of energy-efficiency (market baselines), as well as the potential role of efficiency in a local, state, regional, or national market (potential studies). Market evaluation studies indicate how the overall supply chain and market for energy-efficiency products works and how they have been affected by a program(s). These evaluations can also include assessments of other societal, customer, or utility benefits of Energy Efficiency programs, such as the economic and job creation impacts of the programs, health benefits to society, or T\&D benefits to utilities. And finally, these studies can also be used to inform changes to the portfolio of efficiency measures to be offered to customers, or the savings achieved by the measures.


## Monitoring and Improving Program and Portfolio Performance

There is a feedback loop among program design and implementation, impact evaluation, and process evaluation. Program design and implementation, and evaluation are elements in a cyclical feedback process. Initial program design is informed by prior baseline and market potential studies. Ongoing impact evaluation quantifies whether a program is meeting its goals and may raise questions related to program processes and design. Process evaluation tells the story behind how the impact was achieved and points the way toward improving program impacts by providing insight into program operations. Thus, the three elements work together to create a better, more effective program.

## Budget Considerations for EM\&V work

As noted, proposed budgets for evaluation are reflected in Appendix B. These budgets were established with consideration of the industry standard of reserving $3 \%$ to $5 \%$ of budget for this type of work ${ }^{21}$.

[^47]
## 12. QUANTITATIVE PERFORMANCE INDICATORS (MFR VII.a. \& MFR VII.b.)

The following section outlines the quantitative performance indicators ("QPI") for the first threeyear cycle. The following metrics will be tracked and reported:

1. Annual energy-savings (MWh)
2. Annual demand savings (MW)
3. Lifetime energy-savings (MWh)
4. Lifetime of persisting demand savings (MW-yr)
5. Net present value of utility cost test net benefits (\$)
6. Low income lifetime savings (MWh)
7. Small business lifetime savings (MWh)

The following table shows the ACE planned value, by program year, for each of the seven metrics.
Table 26: QPI Overview

| QPI Metric | PY1 | PY2 | PY3 |
| :--- | ---: | ---: | ---: |
| Annual Energy Savings (MWh) | 33,017 | 59,556 | 87,291 |
| Annual Demand Savings (MW) | 0.7 | 1.2 | 3.4 |
| Lifetime Energy Savings (MWh) | 440,842 | 802,204 | $1,050,453$ |
| Lifetime of Persisting Demand Savings (MW) | 9.6 | 17.3 | 24.3 |
| NPV of UCT Net Benefits (\$) | $38,167,618$ | $65,015,531$ | $79,690,225$ |
| Low-Income Lifetime Savings (MWh) | 31,363 | 125,450 | 131,723 |
| Small Business Lifetime Savings (MWh) | $31,362,618$ | $125,450,472$ | $131,722,996$ |

## 13. COST-EFFECTIVENESS

The cost effectiveness analysis for the ACE portfolio was conducted according to best practices of cost benefit analysis for energy efficiency programs and guidance from the BPU on the New Jersey Cost Test. ${ }^{22}$ While the primary cost effectiveness testing in New Jersey is the New Jersey Cost Test, results for the five California Standard Practice Manual tests are also presented for informational purposes. The table below shows the results of the cost effectiveness testing, including the cost benefit ratio for all six tests for each program by program year. Please refer to the testimony of Brendon Baatz and associated workpapers for detail on cost effectiveness analysis.

Table 27: CBA Results

| Program/Sector |  |  |  |  |  |  |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
|  | NJCT | SCT | TRC | PCT | UCT | RIM |
| Behavior |  |  |  |  |  |  |
| Efficient Products | 2.9 | 3.9 | 2.6 | 4.8 | 2.6 | 1.1 |
| Existing Homes QHEC | 4.9 | 7.5 | 3.5 | 10.2 | 3.7 | 1.2 |
| Existing Homes HPwES | 0.5 | 0.9 | 3.8 | 8.5 | 2.9 | 1.2 |
| Moderate Income Weatherization | 1.0 | 1.6 | 0.3 | 1.0 | 0.6 | 0.4 |
| Multi-Family | 4.2 | 6.9 | 3.1 | 6.9 | 0.6 | 0.5 |
| Prescriptive and Custom | 8.8 | 18.7 | 6.7 | 8.0 | 14.1 | 1.2 |
| Engineered Solutions | 2.1 | 6.3 | 1.4 | 4.7 | 1.9 | 1.3 |
| Direct Install | 2.6 | 4.8 | 1.9 | 4.7 | 1.7 | 1.0 |
| Energy Management | 1.9 | 7.0 | 1.6 | 10.6 | 1.6 | 1.2 |
| Res | 3.1 | 5.1 | 2.4 | 5.5 | 2.7 | 1.1 |
| C\&I | 5.2 | 10.9 | 3.9 | 6.5 | 4.8 | 2.0 |
| LMI | 1.0 | 1.6 | 0.6 | 1.9 | 0.6 | 0.5 |
| Total Portfolio | 3.8 | 7.4 | 2.9 | 5.5 | 3.2 | 1.5 |

[^48]
## APPENDIX A - REBATE AND INCENTIVE MATRICES

## Residential Incentives

| Program | Subprogram | Measure ${ }^{1}$ | Proposed Rebate Strategy ${ }^{2}$ | NJCEP <br> Existing Rebate Strategy |
| :---: | :---: | :---: | :---: | :---: |
| Efficient Products |  | LED Lamps | Up to $\$ 5$ std Up to $\$ 7$ special | Up to \$3 std Up to $\$ 5$ special |
|  |  | LED Fixtures | Up to \$10 | Up to \$8 |
|  |  | Occupancy Sensors | Up to \$7 | - |
|  |  | LED Holiday Lights | Up to \$5 | - |
|  |  | Ceiling Fans | Up to \$35 | - |
|  |  | LED Table/Desk Lamps | Up to \$15 | - |
|  |  | Clothes Washer | Up to \$100 | Up to \$75 |
|  |  | Clothes Dryer | Up to \$300 | Up to \$300 |
|  |  | Refrigerator | Up to \$100 | Up to \$75 |
|  |  | Freezers | Up to \$75 | - |
|  |  | Dishwasher | Up to \$25 | - |
|  |  | Induction Cooktop Stove | Up to \$25 | - |
|  |  | Air Purifier / Cleaner | Up to \$50 | Up to \$50 |
|  |  | Room A/C Unit | Up to \$30 | Up to \$15 |
|  |  | Dehumidifier | Up to \$35 | Up to \$25 |
|  |  | Heat Pump Water Heater | Up to \$1,000 | Up to \$750 |
|  |  | Smart Thermostats | Up to \$125 ${ }^{3}$ | - |
|  |  | Pool Pump | Up to \$500 | - |
|  |  | Sound Bars | Up to \$20 | - |
|  |  | Water Cooler | Up to \$25 | - |


|  | Electric Vehicle Charger | Up to \$50 | - |
| :---: | :---: | :---: | :---: |
|  | Monitors | Up to \$25 | - |
|  | Computers | Up to \$25 | - |
|  | Imaging | Up to \$25 | - |
|  | Smart Strip Plug Outlets | Up to \$40 | Up to \$40 |
|  | TVs | Up to \$50 | - |
|  | Smart Home | Up to \$10 | - |
|  | Refrigerator Recycling | Up to \$100 | Up to \$50 |
|  | Freezer Recycling | Up to \$100 | Up to \$50 |
|  | Room A/C Unit Recycling | Up to \$35 | Up to \$25 |
|  | Dehumidifier Recycling | Up to \$35 | Up to \$25 |
|  | EE Kits | Up to \$60 | - |
|  | Central Air Conditioning | Up to \$500 | Up to \$500 |
|  | Air Source Heat Pump | Up to \$1,000 | Up to \$1,000 |
|  | Geothermal Heat Pump | Up to \$1500 | - |
|  | Ductless Mini-Split Heat Pump | Up to \$400 | - |
|  | Ductless Mini Split A/C | Up to \$500 | Up to \$500 |
|  | Furnace Fans (ECM) | Up to \$100 | - |
|  | PTAC - CEE Tier 2 - Multi Family | Up to \$50 | - |
|  | PTHP - CEE Tier 2- Multi Family | Up to \$125 | - |
|  | Circulating Pump | Up to \$75 | - |
|  | Bathroom Fan | Up to \$20 | - |
|  | HVAC Maintenance | Up to \$100 | - |
|  | HVAC Quality Install | Up to \$450 | - |

$\left.\begin{array}{|l|l|l|l|l|}\hline \text { Existing Homes } & \begin{array}{l}\text { Home } \\ \text { Performance with } \\ \text { Energy Star } \\ \text { (HPwES) }\end{array} & \begin{array}{l}\text { Home Performance with } \\ \text { Energy Star }\end{array} & \begin{array}{c}\text { The following incentive structure } \\ \text { will be used: }\end{array} & \begin{array}{c}\text { Tiered incentive } \\ \text { cash rebate of } \\ \text { Customer must have a minimum } \\ \text { savings percentage of 5\% based } \\ \text { on modeled reduction of } \\ \text { cof the measures }\end{array} \\ \text { used to calculate } \\ \text { TES up to } \\ \$ 4,000 .\end{array}\right\}$

## Multifamily Incentives

| Program | Subprogram | Measure ${ }^{1}$ | Rebate Strategy ${ }^{2}$ | NJCEP Existing Rebate Strategy |
| :---: | :---: | :---: | :---: | :---: |
| Multi-family | Multi-family | Energy Assessment with installation of standard energy savings measures | Energy Assessment with the equipment and installation costs for the standard energy savings measures will be provided to eligible properties with "Up to $100 \%$ " of the cost provided by the program. | Same values offered currently in the HPwES Program. |
|  |  | Prescriptive Equipment replacement and custom retrofit projects | - Same value as incentives offered through the Residential and Commercial \& Industrial programs applicable for the prescriptive equipment replacement and custom retrofits. <br> - Includes enhanced incentives offered for properties that are located in qualifying target areas or for LMI qualified customers. | Same value as incentives offered through the Residential and Commercial \& Industrial programs applicable for the prescriptive equipment replacement and custom retrofits. |
| Multifamily Engineered Solutions | Multifamily Engineered Solutions | MF - Engineered Solutions | - No cost ASHRAE Level I, II, or III audit. <br> - Program will buy-down the simple payback of the recommended energyefficiency project cost for approved measures by up to six years, with the resulting payback not less than three years. | - No cost ASHRAE Level I, II, or III audit. <br> - Program will buy-down the simple payback of the recommended energyefficiency project cost for approved measures by up to six years, with the resulting payback not less than three years. |

${ }^{1}$ The utilities reserve the right to include additional measures that are supported by established protocols or evaluation results in the industry to ensure we include a broad range of energy savings measures to maximize energy savings for customers and avoid market disruption (e.g. new NJCEP measures added in FY21).
${ }^{2}$ All rebates will be offered equal to or less than the "Up to" value.

| Measure ${ }^{\mathbf{1}}$ |  |  |  |
| :--- | :--- | :--- | :--- | :--- |


| LED HIGH/LOW BAY LUMINAIRES |  |  |  |
| :---: | :---: | :---: | :---: |
| New LED high/low bay luminaire | Per Fixture | \$600 | \$50 to \$150 |
| LED EXTERIOR LUMINAIRES |  |  |  |
| New LED luminaire - wall packs, flood lights, canopy, landscape | Per Fixture | \$600 | \$50 to \$100 |
| LED RETROFIT KITS |  |  |  |
| LED linear retrofit kit for $2 \times 2,1 \times 4$ and $2 x 4$ fixtures | Per <br> Fixture | \$45 | \$15 to \$25 |
| LED integrated retrofit kit for 2x2, 1x4 and 2x4 fixtures | Per <br> Fixture | \$120 | \$15 to \$25 |
| LED integrated flat panel retrofit kit for $2 \times 2$, 1x4 and $2 \times 4$ fixtures | Per Panel Kit | \$40 | \$15 to \$25 |
| LED retrofit kit for linear ambient luminaire | Per Foot | \$15 | \$15 to \$40 |
| LED retrofit kit for high/low bay luminaires | Per <br> Fixture | \$100 | - |
| LED retrofit kit for exterior luminaire | Per Fixture | \$100 | - |
| LED ENERGY STAR FIXTURES |  |  |  |
| New LED ENERGY STAR LED fixture recessed downlight, specialty, cove, under cabinet, vent fan, ceiling mount, etc. | Per Fixture | \$100 | \$5 to \$15 |
| LED REPLACEMENT LAMPS |  |  |  |
| LED linear replacement lamp with new LED driver for wall pack, flood light, canopy, recessed fixture. | Per Lamp | \$80 | \$50 to \$150 |


| LED mogul-screw base replacement for HID lamps and new external driver | Per Lamp | \$100 | \$50 to \$150 |
| :---: | :---: | :---: | :---: |
| LED SIGN LIGHTING |  |  |  |
| Exterior/Dusk-to-Dawn, Interior and 24-hour application | Per Watt Reduced | \$2 | - |
| OTHER LIGHTING |  |  |  |
| Exit Signs | Per Unit | \$23 | - |
| Linear Fluorescent HE T8 | Per Fixture | \$15 | - |
| Street/Roadway and Area Lighting | Per <br> Fixture | \$500 | \$100 to \$150 |
| Lighting Controls |  |  |  |
| NETWORKED LIGHTING CONTROLS |  |  |  |
| Networked lighting control system controlling efficient luminaires | Per Watt Controlled | \$0.60 | - |
| Networked lighting control - fixture level control | Per <br> Fixture | \$60 | - |
| DUAL DAYLIGHT/OCCUPANCY CONTROLS |  |  |  |
| Dual daylight \& occupancy sensor (DOS) | Per Control | \$100 | - |
| DAYLIGHT CONTROLS |  |  |  |
| Daylight continuous dimming control | Per Control | \$100 | \$45 |

atlontic city
electric.

| OCCUPANCY/VACANCY CONTROLS |  |  |  |
| :---: | :---: | :---: | :---: |
| Vacancy or Occupancy control | Per Control | \$100 | \$20 |
| Unitary HVAC |  |  |  |
| AIR CONDITIONERS \& HEAT PUMPS |  |  |  |
| Air Conditioning (AC) only - all sizes | Per Ton | \$250 | \$72 to \$105 |
| Heat Pumps - Air Source and Water Source all sizes | Per Ton | \$250 | \$40 to \$100 |
| WATER-COOLED \& EVAPORATIVE COOLING AIR CONDITIONERS |  |  |  |
| $<5.4$ to <11.25 tons | Per Ton | \$250 | - |
| $\geq 11.25$ to $\geq 63.3$ tons | Per Ton | \$250 | - |
| GEOTHERMAL HEAT PUMPS |  |  |  |
| Geothermal Heat Pumps - (Ground Source/Ground Water Source) Tier I or Tier II | Per Ton | \$500 | \$80 to \$100 |
| DUCTLESS, MINI SPLIT AIR CONDITIONERS OR HEAT PUMPS - ALL SIZES |  |  |  |
| all sizes | Per Ton | \$150 | - |
| PACKAGED TERMINAL AIR CONDITIONERS OR HEAT PUMPS |  |  |  |
| all sizes | Per Ton | \$125 | \$40 |
| OTHER HVAC EQUIPMENT |  |  |  |
| atlontic city electric. |  |  | Page \| 97 of 127 |


| HVAC - Smart Thermostat | Per Unit | \$125 ${ }^{3}$ | - |
| :---: | :---: | :---: | :---: |
| Dual Enthalpy Economizer Controls | Per Unit | \$250 | \$85 to \$170 |
| ECM motors for HVAC Applications (fans/pumps) - refer to ECM motors table below |  |  |  |
| Chillers |  |  |  |
| Air-Cooled Chiller with Condenser | Per Ton | \$300 | $\begin{aligned} & \text { \$20, plus } \\ & \$ 2.75 \text { to } \$ 3.50 \\ & \text { performance } \end{aligned}$ |
| Water-Cooled Screw Chiller \& Reciprocating Chillers | Per Ton | \$300 | $\begin{gathered} \$ 13 \text { to } \$ 30 \text {, plus } \\ \$ 2 \text { to } \$ 2.25 \\ \text { performance } \end{gathered}$ |
| Water-Cooled Centrifugal Chillers | Per Ton | \$300 | $\begin{gathered} \$ 8 \text { to } \$ 24, \text { plus } \\ \$ 2 \text { to } \$ 2.25 \\ \text { performance } \end{gathered}$ |
| Chillers with a VFD |  |  |  |
| Air-Cooled Chiller with Condenser | Per Ton | \$300 | $\$ 90$ to $\$ 92$, plus \$4.00 performance |
| Water-Cooled Screw and Reciprocating Chillers | Per Ton | \$300 | $\begin{gathered} \$ 40 \text { to } \$ 44 \text {, plus } \\ \$ 2 \text { to } \$ 2.50 \\ \text { performance } \end{gathered}$ |
| Water-Cooled Centrifugal Chillers | Per Ton | \$300 | $\begin{gathered} \$ 20 \text { to } \$ 30, \text { plus } \\ \$ 2 \text { to } \$ 2.75 \\ \text { performance } \end{gathered}$ |
| Refrigeration |  |  |  |
| Anti-Fog Film | Per Sq. Ft. | \$15 | - |
| Anti-Sweat Heat Control | Per Door | \$50 | \$50 |
| ECM Evaporator Fan Motor, <1 hp | Per Unit | \$150 | \$40 |
| Evaporator/Compressor Controller | Per Cooler | \$1,000 | - |

electric.

| Evaporator Fan Controller on Existing Shaded-Pole Motor | Per Unit | \$100 | \$75 |
| :---: | :---: | :---: | :---: |
| Night Covers - Open Reach-In Coolers | Per Case | \$500 | - |
| Reach-In Door Closer | Per Unit | \$75 | - |
| Refrigeration Display Case Doors on Open Display Case | Per Case | \$600 | - |
| Gaskets | Per Ln Ft. | \$4 | - |
| Strip Curtains for Walk-In Coolers and Freezers | Per Sq. Ft. | \$5 | - |
| Refrigerator Case Light Sensor | Per Case | \$30 | - |
| VFD - Variable Frequency Drives |  |  |  |
| Horsepower |  |  |  |
| < 100 hp | Per HP | \$250 | \$50 to \$100 |
| $>100$ to $\leq 200$ | Per HP | \$50 | \$35 |
| ECM Motors |  |  |  |
| $<1 \mathrm{HP}$ | Per unit | \$150 | - |
| 1 HP | Per unit | \$150 | - |
| 2 HP | Per unit | \$175 | - |
| 3-5 HP | Per unit | \$250 | - |
| 6-10 HP | Per unit | \$500 | - |
| 11+ HP | Per unit | \$750 | - |
| Commercial Kitchen Equipment |  |  |  |
| COMMERCIAL DISHWASHERS | Per Unit | \$1,500 | \$400 to \$1500 |
| COOKING EQUIPMENT |  |  |  |
| Fat Fryers | Per Unit | \$250 | \$200 |

electric.

| Griddles | Per Unit | \$300 | \$300 |
| :---: | :---: | :---: | :---: |
| Insulated Holding Cabinets | Per Unit | \$400 | \$200 to \$300 |
| COMBINATION and CONVECTION OVENS |  |  |  |
| Convection Ovens | Per Unit | \$400 | \$350 |
| Combination Ovens | Per Unit | \$1,200 | \$750 |
| STEAM COOKERS | Per Pan | \$150 | - |
| OTHER FOOD SERVICE |  |  |  |
| Energy Star Beverage Vending Machine | Per Unit | \$75 | - |
| Food Warmers/Rethermalizer Well/Coffee Pots | Per Unit | \$200 | - |
| Pre-Rinse Spray Valve | Per Unit | \$75 | - |
| ICE MACHINES - CEE Tier I | Per Unit | \$200 | \$50 to \$250 |
| ICE MACHINES - CEE Tier II | Per Unit | \$300 | \$100 to \$500 |
| SOLID DOOR REACH-IN REFRIGERATORS | Per Unit | \$225 | \$50 to \$200 |
| SOLID DOOR REACH-IN FREEZERS | Per Unit | \$500 | \$100 to \$600 |
| GLASS DOOR REACH-IN REFRIGERATORS | Per Unit | \$150 | \$75 to \$150 |
| GLASS DOOR REACH-IN Freezers | Per Unit | \$300 | \$200 to \$1000 |
| COMMERICAL APPLIANCES |  |  |  |
| CLOTHES WASHER |  |  |  |
| CEE Tier 1 | Per Unit | \$100 | - |
| CEE Tier 2 | Per Unit | \$200 | - |
| WATER HEATING |  |  |  |
| Heat Pump Water Heater - C\&I | Per Unit | \$1,500 | - |
| PLUG LOAD CONTROLS |  |  |  |

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| Personal Occupancy Sensor | Per Unit | \$20 | - |
| :---: | :---: | :---: | :---: |
| Hotel Room HVAC Controls | Per Unit | \$90 | - |
| Hotel Room HVAC/Receptacle Control | Per Unit | \$20 | - |
| Smart Power Strip | Per Unit | \$20 | - |
| Electric Vehicle Charger | Per Unit | \$50 | - |
| Vending Machine Controls |  |  |  |
| Non-Refrigerated | Per Unit | \$75 | - |
| Refrigerated | Per Unit | \$125 | - |
| OFFICE EQUIPMENT |  |  |  |
| Monitors - C\&I | Per Unit | \$25 | - |
| Computers - C\&I | Per Unit | \$25 | - |
| Uninterruptible Power Supply (UPS) | Per kVA | \$40 | - |
| Imaging - C\&I | Per Unit | \$25 | - |
| Small Network PC Controller | Per PC Controlled | \$25 | - |
| AGRICULTURE |  |  |  |
| Auto Milker Takeoff | Per Unit | \$90 | - |
| Dairy Scroll Compressor | Per Unit | \$1,000 | - |
| HE Ventilation Fans | Per Unit | \$215 | - |
| Heat Reclaimers | Per Unit | \$1,000 | - |
| High Volume Low Speed Fans (Destratification) | Per Ft of Fan Blade | \$25 | - |
| Livestock Waterer | Per Unit | \$60 | - |
| Dairy Vac Pump VSD Controls | Per Unit | \$1,000 | - |

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electric.

| Low Pressure Irrigation | Per acre | \$100 | - |
| :---: | :---: | :---: | :---: |
| Dairy Refrigeration Tune-Up | Per Unit | \$200 | - |
| Engine Block Heater Timer | Per Unit | \$25 | - |
| RECYCLING |  |  |  |
| Dehumidifier Recycling | Per Unit | Refer to Residential Incentive Table | - |
| Refrigerator Recycling | Per Unit | " | - |
| Freezer Recycling | Per Unit | " | - |
| Room A/C Unit Recycling | Per Unit | " | - |
| RESIDENITAL APPLIANCES in C\&I <br> BUILDING - Non Commercial Duty |  |  |  |
|  |  |  |  |
| Clothes Washer Tier 3-C\&I | Per Unit | " | - |
| Clothes Dryer (w Moisture Sensor) - C\&I | Per Unit | " | - |
| Refrigerators Tier 2-C\&I | Per Unit | " | - |
| Refrigerators Tier 3-C\&I | Per Unit | " | - |
| ES Freezer - C \& I | Per Unit | " | - |
| ENERGY STAR Dehumidifier | Per Unit | " | - |
| ENERGY STAR Room Air Conditioner | Per Unit | " | - |
| ENERGY STAR Water Cooler | Per Unit | " | - |


| CUSTOM PROJECTS |  |  |  |
| :---: | :---: | :---: | :---: |
| Compressed Air, Refrigeration, Data Center Equipment/Servers, HVAC/Chillers, HVAC Controls, Motors/VFD - Large, Building Improvements, Process Improvements, Agricultural Lighting/Process, Custom Lighting | per kWh | Up to \$0.35 | \$0.16 per kWh |
| ENERGY MANAGEMENT |  |  |  |
| RETROCOMMISSIONING (including Virtual and Meter Data Commissioning) | per kWh | Up to \$0.35 | - |
| HVAC TUNE UP |  |  |  |
| Single compressor units | Per Unit | \$175 | - |
| Multiple compressor units | Per Unit | \$250 | - |
| PTAC, PTHP, Mini-Splits | Per Unit | \$75 | - |
| BUILDING TUNE UP |  | Up to 70\% of Project Cost | - |
| BUILDING OPERATIONS TRAINING |  | Up to $70 \%$ of the cost to attend qualified BOC training up to $\$ 1000$ per person. | - |
| ENGINEERED SOLUTIONS |  |  |  |
|  |  | Formula buy down based on payback | Formula buy down based on payback |
| ${ }^{1}$ The utilities reserve the right to include additional measures that are supported by established protocols or evaluation results in the industry to ensure we include a broad range of energy savings measures to maximize energy savings for customers and avoid market disruption (e.g. new NJCEP measures added in FY21). |  |  |  |
| ${ }^{2}$ All rebates will be offered equal to or less than the "Up to" value. |  |  |  |
| ${ }^{3}$ The total rebate value for a smart thermostat will be up to $\$ 125$ total between both fuel utilities. |  |  |  |
|  |  |  |  |

## APPENDIX B - PROGRAM PARTICIPATION, SAVINGS, AND COST DETAILS

Participation and Savings Estimates

Table 28. Participation

| Subprogram | 1 | 2 | 3 | Total |
| :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 155,000 | 155,000 |
| Efficient Products | 79,922 | 81,204 | 80,610 | 241,736 |
| Existing Homes QHEC | 285 | 6,500 | 9,000 | 15,785 |
| Existing Homes HPwES | 190 | 281 | 360 | 831 |
| Moderate Income Weatherization | 160 | 450 | 825 | 1,435 |
| Multi-Family | 1,060 | 2,088 | 3,117 | 6,265 |
| Energy Solutions for Business: Prescriptive and Custom | 95,134 | 126,542 | 169,482 | 391,158 |
| Energy Solutions for Business: Engineered Solutions | 0 | 1 | 1 | 2 |
| Direct Install | 45 | 180 | 189 | 414 |
| Energy Solutions for Business: Energy Management | 25 | 25 | 130 | 180 |
| Total | 176,821 | 217,271 | 418,714 | 812,806 |

electric.

Table 29. Electric Consumption Savings (kWh) - Incremental Annual

| Subprogram | 1 | 2 | 3 | Total |
| :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 7,998,318 | 7,998,318 |
| Efficient Products | 9,236,964 | 11,595,373 | 13,495,924 | 34,328,261 |
| Existing Homes QHEC | 272,745 | 6,835,106 | 9,463,994 | 16,571,845 |
| Existing Homes HPwES | 423,887 | 626,906 | 803,154 | 1,853,947 |
| Moderate Income Weatherization | 293,049 | 824,199 | 1,511,032 | 2,628,280 |
| Multi-Family | 968,395 | 2,298,119 | 3,239,704 | 6,506,218 |
| Energy Solutions for Business: Prescriptive and Custom | 18,930,154 | 27,604,255 | 36,619,336 | 83,153,745 |
| Energy Solutions for Business: Engineered Solutions | 0 | 607,879 | 1,215,757 | 1,823,636 |
| Direct Install | 2,090,841 | 8,363,365 | 8,781,533 | 19,235,739 |
| Energy Solutions for Business: Energy Management | 800,526 | 800,526 | 4,162,734 | 5,763,785 |
| Total | 33,016,560 | 59,555,728 | 87,291,487 | 179,863,774 |

electric.

Table 30. Electric Demand Savings (kW) - Incremental Annual.

|  | Subprogram | 1 | 2 |  | Total |
| :--- | ---: | ---: | ---: | ---: | ---: |
| Home Energy Reports | 0 | 0 | 1,802 | $\mathbf{1 , 8 0 2}$ |  |
| Efficient Products | 86 | 108 | 128 | $\mathbf{3 2 1}$ |  |
| Existing Homes QHEC | 3 | 69 | 96 | $\mathbf{1 6 7}$ |  |
| Existing Homes HPwES | 4 | 6 | 8 | $\mathbf{1 9}$ |  |
| Moderate Income Weatherization | 6 | 17 | 31 | $\mathbf{5 4}$ |  |
| Multi-Family | 11 | 28 | 38 | $\mathbf{7 6}$ |  |
| Energy Solutions for Business: Prescriptive and Custom | 496 | 715 | 949 | $\mathbf{2 , 1 6 0}$ |  |
| Energy Solutions for Business: Engineered Solutions | 0 | 17 | 34 | $\mathbf{5 1}$ |  |
| Direct Install | 58 | 232 | 243 | $\mathbf{5 3 2}$ |  |
| Energy Solutions for Business: Energy Management | 13 | 13 | 70 | $\mathbf{9 6}$ |  |
| Total | $\mathbf{6 7 7}$ | $\mathbf{1 , 2 0 4}$ | $\mathbf{3 , 3 9 8}$ | $\mathbf{5 , 2 7 9}$ |  |

atlantic city
electric.

Table 31. Gas Consumption Savings (therms) - Incremental Annual

|  |  |  |  |  |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
| Subprogram | 1 | 2 | 3 | Total |
| Home Energy Reports | 0 | 0 | 0 | $\mathbf{0}$ |
| Efficient Products | 184,291 | 248,838 | 274,130 | $\mathbf{7 0 7 , 2 5 9}$ |
| Existing Homes QHEC | 2,501 | 57,037 | 78,974 | $\mathbf{1 3 8 , 5 1 1}$ |
| Existing Homes HPwES | 13,493 | 19,955 | 25,566 | $\mathbf{5 9 , 0 1 4}$ |
| Moderate Income Weatherization | 19,943 | 56,089 | 102,829 | $\mathbf{1 7 8 , 8 6 1}$ |
| Multi-Family | 4,750 | 13,523 | 15,966 | $\mathbf{3 4 , 2 3 8}$ |
| Energy Solutions for Business: Prescriptive and Custom | $-91,057$ | $-121,106$ | $-161,820$ | $\mathbf{- 3 7 3 , 9 8 3}$ |
| Energy Solutions for Business: Engineered Solutions | 0 | 43,918 | 87,836 | $\mathbf{1 3 1 , 7 5 4}$ |
| Direct Install | 62,140 | 248,559 | 260,987 | $\mathbf{5 7 1 , 6 8 7}$ |
| Energy Solutions for Business: Energy Management | 0 | 0 | 0 | $\mathbf{0}$ |
| Total | $\mathbf{1 9 6 , 0 5 9}$ | $\mathbf{5 6 6 , 8 1 3}$ | $\mathbf{6 8 4 , 4 6 9}$ | $\mathbf{1 , 4 4 7 , \mathbf { 3 4 1 }}$ |

electric.

Table 32. Electric Consumption Savings (kWh) - Lifetime

| Subprogram | 1 | 2 | 3 | Total |
| :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 7,998,318 | 7,998,318 |
| Efficient Products | 102,248,999 | 125,125,027 | 144,364,246 | 371,738,272 |
| Existing Homes QHEC | 3,070,738 | 74,951,208 | 103,778,596 | 181,800,541 |
| Existing Homes HPwES | 7,206,075 | 10,657,406 | 13,653,616 | 31,517,096 |
| Moderate Income Weatherization | 4,554,307 | 12,808,989 | 23,483,146 | 40,846,441 |
| Multi-Family | 11,065,356 | 29,366,170 | 39,904,208 | 80,335,735 |
| Energy Solutions for Business: Prescriptive and Custom | 277,330,976 | 407,684,603 | 540,419,422 | 1,225,435,001 |
| Energy Solutions for Business: Engineered Solutions | 0 | 12,157,575 | 24,315,150 | 36,472,724 |
| Direct Install | 31,362,618 | 125,450,472 | 131,722,996 | 288,536,087 |
| Energy Solutions for Business: Energy Management | 4,002,629 | 4,002,629 | 20,813,669 | 28,818,926 |
| Total | 440,841,699 | 802,204,077 | 1,050,453,366 | 2,293,499,142 |

Table 33. Electric Demand Savings (kW) - Lifetime

| Subprogram | 1 | 2 | 3 | Total |
| :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 1,802 | 1,802 |
| Efficient Products | 987 | 1,214 | 1,418 | 3,618 |
| Existing Homes QHEC | 30 | 754 | 1,044 | 1,828 |
| Existing Homes HPwES | 74 | 109 | 140 | 322 |
| Moderate Income Weatherization | 111 | 311 | 571 | 993 |
| Multi-Family | 123 | 372 | 484 | 979 |
| Energy Solutions for Business: Prescriptive and Custom | 7,386 | 10,709 | 14,209 | 32,304 |
| Energy Solutions for Business: Engineered Solutions | 0 | 337 | 675 | 1,012 |
| Direct Install | 868 | 3,473 | 3,646 | 7,987 |
| Energy Solutions for Business: Energy Management | 67 | 67 | 348 | 482 |
| Total | 9,645 | 17,346 | 24,336 | 51,327 |

electric.

Table 34. Gas Consumption Savings (therms) - Lifetime

|  | Subprogram | 1 | 2 | 3 | Total |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
| Home Energy Reports | 0 | 0 | 0 | $\mathbf{0}$ |  |
| Efficient Products | 997,856 | $1,450,840$ | $1,609,406$ | $\mathbf{4 , 0 5 8 , 1 0 2}$ |  |
| Existing Homes QHEC | 13,838 | 315,600 | 436,984 | $\mathbf{7 6 6 , 4 2 1}$ |  |
| Existing Homes HPwES | 229,380 | 339,241 | 434,615 | $\mathbf{1 , 0 0 3 , 2 3 6}$ |  |
| Moderate Income Weatherization | 379,886 | $1,068,429$ | $1,958,786$ | $\mathbf{3 , 4 0 7 , 1 0 1}$ |  |
| Multi-Family | 53,492 | 192,903 | 205,713 | $\mathbf{4 5 2 , 1 0 7}$ |  |
| Energy Solutions for Business: Prescriptive and Custom | $-1,854,229$ | $-2,466,124$ | $-3,291,111$ | $\mathbf{- 7 , 6 1 1 , 4 6 5}$ |  |
| Energy Solutions for Business: Engineered Solutions | 0 | 878,361 | $1,756,721$ | $\mathbf{2 , 6 3 5 , 0 8 2}$ |  |
| Direct Install | 932,098 | $3,728,392$ | $3,914,812$ | $\mathbf{8 , 5 7 5 , 3 0 1}$ |  |
| Energy Solutions for Business: Energy Management | 0 | 0 | 0 | $\mathbf{0}$ |  |
| Total | $\mathbf{7 5 2 , 3 2 1}$ | $\mathbf{5 , 5 0 7 , 6 4 0}$ | $\mathbf{7 , 0 2 5 , 9 2 6}$ | $\mathbf{1 3 , 2 8 5 , 8 8 7}$ |  |

Cost Estimates - Cost Categories

Table 35. Total Expenditures (\$)

| Subprogram | 0 | 1 | 2 | 3 | 4+ | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 0 | 502,994 | 0 | 502,994 |
| Efficient Products | 0 | 4,954,630 | 5,134,406 | 5,673,939 | 0 | 15,762,975 |
| Existing Homes QHEC | 0 | 157,998 | 3,730,691 | 5,082,121 | 0 | 8,970,810 |
| Existing Homes HPwES | 0 | 2,134,929 | 3,048,909 | 3,800,268 | 0 | 8,984,106 |
| Moderate Income Weatherization | 0 | 1,530,939 | 4,237,972 | 7,645,326 | 0 | 13,414,237 |
| Multi-Family | 0 | 552,612 | 1,365,887 | 1,838,724 | 0 | 3,757,222 |
| Energy Solutions for Business: Prescriptive and Custom | 0 | 2,544,260 | 4,021,154 | 5,112,135 | 0 | 11,677,549 |
| Energy Solutions for Business: Engineered Solutions | 0 | 140,355 | 1,196,032 | 1,412,995 | 0 | 2,749,382 |
| Direct Install | 0 | 3,215,434 | 12,318,627 | 12,364,294 | 0 | 27,898,354 |
| Energy Solutions for Business: Energy Management | 0 | 314,599 | 293,968 | 1,421,356 | 0 | 2,029,923 |
| Portfolio Costs | 0 | 1,125,000 | 875,000 | 875,000 | 0 | 2,875,000 |
| Total | 0 | 16,670,756 | 36,222,645 | 45,729,152 | 0 | 98,622,553 |

Table 36. Capital Costs (\$)

| Subprogram | 0 | 1 | 2 | 3 | 4+ | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 0 | 0 | 0 | 0 |
| Efficient Products | 0 | 1,000,000 | 250,000 | 250,000 | 0 | 1,500,000 |
| Existing Homes QHEC | 0 | 0 | 0 | 0 | 0 | 0 |
| Existing Homes HPwES | 0 | 0 | 0 | 0 | 0 | 0 |
| Moderate Income Weatherization | 0 | 0 | 0 | 0 | 0 | 0 |
| Multi-Family | 0 | 0 | 0 | 0 | 0 | 0 |
| Energy Solutions for Business: Prescriptive and Custom | 0 | 0 | 0 | 0 | 0 | 0 |
| Energy Solutions for Business: Engineered Solutions | 0 | 0 | 0 | 0 | 0 | 0 |
| Direct Install | 0 | 0 | 0 | 0 | 0 | 0 |
| Energy Solutions for Business: Energy Management | 0 | 0 | 0 | 0 | 0 | 0 |
| Portfolio Costs | 0 | 750,000 | 0 | 0 | 0 | 750,000 |
| Total | 0 | 1,750,000 | 250,000 | 250,000 | 0 | 2,250,000 |

Table 37. Utility Administration (\$)

| Subprogram | 0 | 1 | 2 | 3 | 4+ | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 0 | 19,049 | 0 | 19,049 |
| Efficient Products | 0 | 635,310 | 600,954 | 650,573 | 0 | 1,886,837 |
| Existing Homes QHEC | 0 | 2,182 | 49,612 | 64,882 | 0 | 116,677 |
| Existing Homes HPwES | 0 | 35,090 | 45,938 | 51,220 | 0 | 132,248 |
| Moderate Income Weatherization | 0 | 129,897 | 337,690 | 568,418 | 0 | 1,036,005 |
| Multi-Family | 0 | 26,620 | 60,045 | 77,318 | 0 | 163,983 |
| Energy Solutions for Business: Prescriptive and Custom | 0 | 22,268 | 37,299 | 43,322 | 0 | 102,889 |
| Energy Solutions for Business: Engineered Solutions | 0 | 43,391 | 346,075 | 389,467 | 0 | 778,933 |
| Direct Install | 0 | 25,956 | 86,887 | 73,447 | 0 | 186,290 |
| Energy Solutions for Business: Energy Management | 0 | 7,087 | 5,933 | 24,844 | 0 | 37,864 |
| Portfolio Costs | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 927,802 | 1,570,433 | 1,962,540 | 0 | 4,460,775 |

electric.

Table 38. Marketing (\$)

| Subprogram | 0 | 1 | 2 | 3 | 4+ | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 0 | 0 | 0 | 0 |
| Efficient Products | 0 | 258,444 | 279,977 | 287,583 | 0 | 826,004 |
| Existing Homes QHEC | 0 | 14,615 | 319,781 | 400,009 | 0 | 734,405 |
| Existing Homes HPwES | 0 | 225,880 | 266,854 | 289,015 | 0 | 781,749 |
| Moderate Income Weatherization | 0 | 32,291 | 90,818 | 166,501 | 0 | 289,610 |
| Multi-Family | 0 | 12,743 | 30,710 | 42,450 | 0 | 85,903 |
| Energy Solutions for Business: Prescriptive and Custom | 0 | 95,746 | 156,354 | 176,487 | 0 | 428,587 |
| Energy Solutions for Business: Engineered Solutions | 0 | 9,721 | 77,532 | 87,253 | 0 | 174,506 |
| Direct Install | 0 | 273,849 | 921,834 | 785,688 | 0 | 1,981,371 |
| Energy Solutions for Business: Energy Management | 0 | 101,113 | 88,846 | 398,211 | 0 | 588,170 |
| Portfolio Costs | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 1,024,401 | 2,232,707 | 2,633,197 | 0 | 5,890,305 |

electric.

Table 39. Rebates, Grants, Loans, and Other Direct Incentives (\$)

| Subprogram | 0 | 1 | 2 | 3 | 4+ | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 0 | 480,500 | 0 | 480,500 |
| Efficient Products | 0 | 2,073,966 | 2,767,482 | 3,155,288 | 0 | 7,996,736 |
| Existing Homes QHEC | 0 | 121,895 | 2,924,708 | 4,049,595 | 0 | 7,096,197 |
| Existing Homes HPwES | 0 | 1,537,270 | 2,273,541 | 2,912,722 | 0 | 6,723,533 |
| Moderate Income Weatherization | 0 | 1,201,891 | 3,380,319 | 6,197,252 | 0 | 10,779,462 |
| Multi-Family | 0 | 440,185 | 1,113,737 | 1,519,272 | 0 | 3,073,193 |
| Energy Solutions for Business: Prescriptive and Custom | 0 | 1,818,710 | 2,878,068 | 3,781,752 | 0 | 8,478,531 |
| Energy Solutions for Business: Engineered Solutions | 0 | 75,781 | 679,425 | 830,230 | 0 | 1,585,435 |
| Direct Install | 0 | 2,039,953 | 8,159,813 | 8,567,804 | 0 | 18,767,570 |
| Energy Solutions for Business: Energy Management | 0 | 98,599 | 98,599 | 512,712 | 0 | 709,909 |
| Portfolio Costs | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 9,408,249 | 24,275,691 | 32,007,126 | 0 | 65,691,066 |

Table 40. Outside Service (\$)

| Subprogram | 0 | 1 | 2 | 3 | 4+ | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 0 | 0 | 0 | 0 |
| Efficient Products | 0 | 573,676 | 700,121 | 753,603 | 0 | 2,027,400 |
| Existing Homes QHEC | 0 | 17,128 | 384,639 | 496,125 | 0 | 897,892 |
| Existing Homes HPwES | 0 | 310,136 | 423,968 | 498,697 | 0 | 1,232,801 |
| Moderate Income Weatherization | 0 | 127,057 | 320,270 | 519,185 | 0 | 966,513 |
| Multi-Family | 0 | 54,738 | 120,302 | 150,229 | 0 | 325,269 |
| Energy Solutions for Business: Prescriptive and Custom | 0 | 534,565 | 841,338 | 988,952 | 0 | 2,364,856 |
| Energy Solutions for Business: Engineered Solutions | 0 | 5,041 | 40,206 | 45,247 | 0 | 90,495 |
| Direct Install | 0 | 848,140 | 3,041,829 | 2,825,654 | 0 | 6,715,623 |
| Energy Solutions for Business: Energy Management | 0 | 103,339 | 96,934 | 470,756 | 0 | 671,029 |
| Portfolio Costs | 0 | 0 | 500,000 | 500,000 | 0 | 1,000,000 |
| Total | 0 | 2,573,821 | 6,469,607 | 7,248,449 | 0 | 16,291,877 |

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electric.

Table 41. Inspections and Quality Control (\$)

| Subprogram | 0 | 1 | 2 | 3 | 4+ | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 0 | 2,117 | 0 | 2,117 |
| Efficient Products | 0 | 53,923 | 66,773 | 72,286 | 0 | 192,982 |
| Existing Homes QHEC | 0 | 242 | 5,512 | 7,209 | 0 | 12,964 |
| Existing Homes HPwES | 0 | 3,899 | 5,104 | 5,691 | 0 | 14,694 |
| Moderate Income Weatherization | 0 | 14,433 | 37,521 | 63,158 | 0 | 115,112 |
| Multi-Family | 0 | 2,958 | 6,672 | 8,591 | 0 | 18,220 |
| Energy Solutions for Business: Prescriptive and Custom | 0 | 2,474 | 4,144 | 4,814 | 0 | 11,432 |
| Energy Solutions for Business: Engineered Solutions | 0 | 4,821 | 38,453 | 43,274 | 0 | 86,548 |
| Direct Install | 0 | 2,884 | 9,654 | 8,161 | 0 | 20,699 |
| Energy Solutions for Business: Energy Management | 0 | 787 | 659 | 2,760 | 0 | 4,207 |
| Portfolio Costs | 0 | 200,000 | 200,000 | 200,000 | 0 | 600,000 |
| Total | 0 | 286,422 | 374,493 | 418,060 | 0 | 1,078,975 |

electric.

Table 42. Evaluation (\$)

| Subprogram | 0 | 1 | 2 | 3 | 4+ | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 0 | 1,328 | 0 | 1,328 |
| Efficient Products | 0 | 359,310 | 469,099 | 504,607 | 0 | 1,333,016 |
| Existing Homes QHEC | 0 | 1,935 | 46,439 | 64,300 | 0 | 112,675 |
| Existing Homes HPwES | 0 | 22,654 | 33,504 | 42,923 | 0 | 99,081 |
| Moderate Income Weatherization | 0 | 25,370 | 71,353 | 130,813 | 0 | 227,535 |
| Multi-Family | 0 | 15,369 | 34,421 | 40,864 | 0 | 90,654 |
| Energy Solutions for Business: Prescriptive and Custom | 0 | 70,497 | 103,951 | 116,807 | 0 | 291,255 |
| Energy Solutions for Business: Engineered Solutions | 0 | 1,600 | 14,341 | 17,525 | 0 | 33,466 |
| Direct Install | 0 | 24,652 | 98,609 | 103,540 | 0 | 226,801 |
| Energy Solutions for Business: Energy Management | 0 | 3,674 | 2,998 | 12,072 | 0 | 18,744 |
| Portfolio Costs | 0 | 175,000 | 175,000 | 175,000 | 0 | 525,000 |
| Total | 0 | 700,060 | 1,049,715 | 1,209,780 | 0 | 2,959,555 |

electric.

Cost Estimates - Investment and Expenses

Table 43. Direct Investment (Rebates/Incentives/Capitalized Admin/etc) (\$)

| Subprogram | 0 | 1 | 2 | 3 | 4+ | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 0 | 480,500 | 0 | 480,500 |
| Efficient Products | 0 | 3,538,255 | 3,455,675 | 3,827,160 | 0 | 10,821,090 |
| Existing Homes QHEC | 0 | 153,637 | 3,629,127 | 4,945,729 | 0 | 8,728,494 |
| Existing Homes HPwES | 0 | 1,671,017 | 2,417,322 | 3,027,712 | 0 | 7,116,050 |
| Moderate Income Weatherization | 0 | 1,361,239 | 3,791,408 | 6,882,938 | 0 | 12,035,585 |
| Multi-Family | 0 | 507,666 | 1,211,877 | 1,659,078 | 0 | 3,378,621 |
| Energy Solutions for Business: Prescriptive and Custom | 0 | 2,109,741 | 3,388,963 | 4,302,239 | 0 | 9,800,942 |
| Energy Solutions for Business: Engineered Solutions | 0 | 90,543 | 722,138 | 812,681 | 0 | 1,625,362 |
| Direct Install | 0 | 3,023,389 | 11,569,265 | 11,597,225 | 0 | 26,189,878 |
| Energy Solutions for Business: Energy Management | 0 | 303,050 | 284,379 | 1,381,679 | 0 | 1,969,108 |
| Portfolio Costs | 0 | 750,000 | 0 | 0 | 0 | 750,000 |
| Total | 0 | 13,508,537 | 30,470,153 | 38,916,940 | 0 | 82,895,630 |

Table 44. Loan Investment (\$)

| Subprogram | 0 | 1 | 2 | 3 | 4+ | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 0 | 0 | 0 | 0 |
| Efficient Products | 0 | 267,831 | 441,905 | 519,314 | 0 | 1,229,050 |
| Existing Homes QHEC | 0 | 0 | 0 | 0 | 0 | 0 |
| Existing Homes HPwES | 0 | 302,270 | 447,041 | 572,722 | 0 | 1,322,033 |
| Moderate Income Weatherization | 0 | 0 | 0 | 0 | 0 | 0 |
| Multi-Family | 0 | 0 | 52,872 | 52,872 | 0 | 105,745 |
| Energy Solutions for Business: Prescriptive and Custom | 0 | 339,281 | 486,798 | 644,953 | 0 | 1,471,031 |
| Energy Solutions for Business: Engineered Solutions | 0 | 0 | 75,025 | 150,049 | 0 | 225,074 |
| Direct Install | 0 | 138,553 | 554,211 | 581,922 | 0 | 1,274,686 |
| Energy Solutions for Business: Energy Management | 0 | 0 | 0 | 0 | 0 | 0 |
| Portfolio Costs | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 1,047,934 | 2,057,852 | 2,521,832 | 0 | 5,627,618 |

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electric.

Table 45. Expenses (\$)

| Subprogram | 0 | 1 | 2 | 3 | 4+ | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Home Energy Reports | 0 | 0 | 0 | 22,494 | 0 | 22,494 |
| Efficient Products | 0 | 1,148,544 | 1,236,826 | 1,327,465 | 0 | 3,712,835 |
| Existing Homes QHEC | 0 | 4,360 | 101,563 | 136,392 | 0 | 242,316 |
| Existing Homes HPwES | 0 | 161,643 | 184,546 | 199,834 | 0 | 546,023 |
| Moderate Income Weatherization | 0 | 169,700 | 446,564 | 762,388 | 0 | 1,378,652 |
| Multi-Family | 0 | 44,946 | 101,138 | 126,773 | 0 | 272,857 |
| Energy Solutions for Business: Prescriptive and Custom | 0 | 95,239 | 145,394 | 164,943 | 0 | 405,576 |
| Energy Solutions for Business: Engineered Solutions | 0 | 49,812 | 398,869 | 450,265 | 0 | 898,947 |
| Direct Install | 0 | 53,492 | 195,150 | 185,147 | 0 | 433,790 |
| Energy Solutions for Business: Energy Management | 0 | 11,549 | 9,590 | 39,677 | 0 | 60,815 |
| Portfolio Costs | 0 | 375,000 | 875,000 | 875,000 | 0 | 2,125,000 |
| Total | 0 | 2,114,285 | 3,694,640 | 4,290,380 | 0 | 10,099,305 |

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electric.

## APPENDIX C - CUSTOMER FINANCING OPTIONS BY PROGRAM

| Program | Eligibility | Terms |  |
| :---: | :---: | :---: | :---: |
| Efficient Products | Efficient program eligible HVAC and water heating equipment | Maximum to be financed | Up to \$15,000 per project |
|  |  | Minimum to be financed | \$2,500 |
|  |  | Interest Rate | 0\% |
|  |  | Term | Up to 7 years |
| Existing Homes | Comprehensive HPwES projects recommended by the program audit | Maximum to be financed | \$15,000 |
|  |  | Minimum to be financed | \$2,500 |
|  |  | Interest Rate | 0\% |
|  |  | Term | Up to 7 years <= \$10,000; <br> Up to 10 years > \$10,000 |
| Multifamily | Prescriptive/Custom equipment, retrofit and comprehensive projects, Engineered Solutions Multifamily projects | Maximum to be financed | $\$ 3,000$ per unit with a maximum of up to \$250,000 per project |
|  |  | Minimum to be financed | \$2,500 based on operational decisions |
|  |  | Interest Rate | 0\% |
|  |  | Term | Up to 10 years, depending on eligibility |
| Direct Install | Balance of program eligible project cost | Maximum to be financed | \$75,000 |
|  |  | Minimum to be financed | \$2,500 |
|  |  | Interest Rate | 0\% |
|  |  | Term | 5 years |
| Energy Solutions for Business | Prescriptive/Custom equipment, retrofit and comprehensive projects, Engineered Solutions projects | Maximum to be financed | \$250,000 |
|  |  | Minimum to be financed | \$2,500 |
|  |  | Interest Rate | 0\% |
|  |  | Term | 5 years |

## APPENDIX D - ENERGY EFFICIENCY AS A RESOURCE PROJECTIONS

| EE <br> Installation <br> Period | EE Plan <br> Potential <br> Summer <br> MW | EE Plan <br> Potential <br> Winter <br> MW | EE Plan <br> Potential CP <br> MW | Potential <br> DY 24/25 <br> EE CP MW | Potential <br> $\mathbf{2 5 / 2 6 ~ E E ~}$ <br> CP MW |
| :---: | :---: | :---: | :---: | :---: | :---: |
| $20 / 21$ | 0.0 | - | - | n/a | n/a |
| $21 / 22$ | 0.6 | 0.5 | 0.5 | 0.5 | 0.5 |
| $22 / 23$ | 1.0 | 0.8 | 0.8 | 0.8 | 0.8 |
| $23 / 24$ | 1.3 | 1.1 | 1.1 | 1.1 | 1.1 |
| $24 / 25$ | n/a | n/a | n/a | n/a | n/a |
| Totals | $\mathbf{2 . 9}$ | $\mathbf{2 . 4}$ |  | $\mathbf{2 . 4}$ | $\mathbf{2 . 4}$ |

## Schedule (BJB)-3

Atlantic City Electric Company
Energy Efficiency Filing
ACE EE Target Development

| Year | Sales (kWh) | Baseline <br> $(\mathrm{kWh})$ | Program <br> Year | Goal (\%) | Goal (MWh) |
| :---: | ---: | ---: | :---: | ---: | ---: |
| 2018 | $8,911,443$ |  |  |  |  |
| 2019 | $8,651,000$ |  |  |  |  |
| 2020 | $8,268,000$ |  |  |  |  |
| 2021 | $8,440,000$ | $8,610,148$ | PY1 | $0.38 \%$ | 33,017 |
| 2022 | $8,495,000$ | $8,453,000$ | PY2 | $0.74 \%$ | 62,552 |
|  |  | $8,401,000$ | PY3 | $0.97 \%$ | 81,490 |

## Schedule (BJB)-4

5ame

| Total Re, | urce cost Test (Tra) |  | ${ }^{\text {m }}$ |  |  | comperaic | mamem | meame |  | nus wes | mon | muteme | $\begin{aligned} & \text { Energy Solutions for } \\ & \text { Business: Prescriptive } \\ & \text { and Custom } \end{aligned}$ |  | Tetmens |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 1 Avoided Wholesale Electric Energy and Electric Ancillary Costs <br> 2 Avoided Wholesale Electric Capacity Costs <br> 4 Avoided RPS REC Purchase Costs <br> Avoided Wholesale Volatility Costs <br> 7 Electric Energy and Capacity Demand Reduction Induced Price Effects (DRIPE; <br> Avoided Transmission and Distribution Costs Total Benefits <br> Total Benefits | ${ }^{12,23,4,5647}$ |  |  |  |  | $\begin{aligned} & 120,203 \\ & \begin{array}{l} 23,075 \\ 61,617 \end{array} \\ & 6, \end{aligned}$ $\begin{array}{r} 689,238 \\ 1,124,882 \end{array}$ |  | $\begin{array}{rr}4,393,131 & \$ \\ 523,500 & \$ \\ 208,455 & \$ \\ 2,127,151 & \$ \\ 512,509 & \$ \\ 2,313,760 & \$ \\ 12,105,628 & \$ \\ 22,184,133 & \$\end{array}$ |  | 945,754 256,486 712,143 403,786 191,438 839,864 $4,061,908$ $7,411,379$ |  |  |  |  | $\begin{array}{rr}805,779 & \$ \\ 151,935 & \$ \\ - & \$ \\ 403,075 & \$ \\ 95,771 & \$ \\ 573,296 & \$ \\ 841,814 & \$ \\ 2,871,671 & \end{array}$ |
|  |  |  |  |  |  |  |  |  | $\begin{array}{r} 4,253,694 \\ 1,627,064 \\ 5,880,759 \end{array}$ | $\begin{array}{ll} \$ & 9,574,797 \\ \$ & 2,016,537 \\ \$ & 11,591,334 \end{array}$ |  | $\begin{array}{rr} 2,495,230 & \$ \\ 603,073 & \$ \\ 3,098,303 & \$ \end{array}$ |  | $\begin{array}{r} 1,857,164 \\ 1,016,172 \\ \mathbf{2 , 8 7 3 , 3 3 6} \end{array}$ |  | cose |
| Participa | ant cost Test (PCC) |  | \%es | ca | ${ }^{\text {mm }}$ ro | Tosteratio | memem | mpame | mentc | manemesmem | Nememe |  | $\begin{aligned} & \text { Energy Solutions for } \\ & \text { Business: Prescriptive } \\ & \text { and Custom } \end{aligned}$ |  |  |  |
|  |  |  |  | $\left.\begin{array}{r}178,739,351 \\ 2,537,195 \\ \$ \\ 23,241,752\end{array}\right)$ | $\begin{array}{ccc}  & 5,912,269 & \$ \\ \$ & 2,650,523 & \$ \\ \$ & 9,389,203 & \$ \\ \$ & - & \$ \\ & 17,951,995 & \$ \\ & 9,207,655 & \$ \\ \$ & 9,207,655 & \$ \end{array}$ |  |  | 60,489,129 <br> 4,458,310 <br> $6,031,041$ $(57,578)$ <br> 70,920,902 <br> $6,975,598$ $6,975,598$ | 848,879 6,141,692 35,996,517 \$ $4,253,694$ $4,253,694$ |  | $\begin{array}{ccc} \$ & 5,912,269 & \$ \\ \$ & 2,650,523 & \$ \\ \$ & 9,389,203 & \$ \\ \$ & - & \$ \\ \$ & 17,951,995 & \$ \\ & 9,207,655 & \$ \\ \$ & 9,207,655 & \$ \end{array}$ |  |  |  |  |  |
| Progam | Iministrato Cost Test (PAC) |  | \%es | ca | m | cose | memem | greame |  | ses | memet |  | $\begin{aligned} & \text { Energy Solutions for } \\ & \text { Business: Prescriptive } \\ & \text { and Custom } \end{aligned}$ |  |  |  |
|  | 15 Avoided Wholesale Electric Energy and Electric Ancillary Costs <br> 16 Avoided Wholesale Electric Capacity Costs 17 Avoided Wholesale Natural Gas Costs <br> 18 Avoided RPS REC Purchase Costs <br> 19 Avoided Wholesale Volatility Costs <br> 20 Electric Energy and Capacity Demand Reduction Induced Price Effects (DRIPE; <br> Total Benefits | 20,21 |  |  | $\begin{array}{r} 945,754 \\ 256,486 \\ 712,143 \\ 403,786 \\ 191,438 \\ 839,864 \\ 4,061,908 \\ 7,411,379 \end{array}$ | cem |  |  |  |  | 955,54 <br> 945,754 256,486 <br> 712,143 403,786 <br> 191,438 839,864 <br> $4,061,908$ $7,411,379$ | $1,947,631$ 269,574 $\$ 9$ 99,068 $\$$ 873,747 231,627 $\$$ $1,093,936$$\$$ | $\begin{aligned} \hline 29,557,431 & \$ \\ 8,820,210 & \$ \\ (1,602,327) & \$ \\ 13,276,585 & \$ \\ 3,677,531 & \$ \\ 28,403,705 & \$ \\ 43,869,844 & \$ \\ 126,002,979 & \$ \end{aligned}$ |  |  |  |
|  |  |  |  |  |  |  | $\begin{array}{r} 18,919 \\ 416,401 \\ - \\ 435,319 \\ 2.6 \end{array}$ |  | $\begin{gathered} 1,627,064 \\ 6,141,692 \\ - \\ 7,768,757 \end{gathered}$ | $\begin{aligned} & 520.6,539 \\ & \hline \\ & \hline \end{aligned}$ |  |  |  |  |  |  |
| Rate | ver Impact Meassure Test (RIM) |  | nes | cal | mm |  | * | Element | mome | mweme wem | emem | Mramiv | $\begin{aligned} & \text { Energy Solutions for } \\ & \text { Business: Prescriptive } \\ & \text { and Custom } \end{aligned}$ |  |  |  |
|  | 25 Avoided Wholesale Electric Energy and Electric Ancillary Costs <br> 26 Avoided Wholesale Electric Capacity Cost <br> 28 Avoided RPS REC Purchase Costs <br> 29 Avoided Wholesale Volatility Costs <br> 30 Electric Energy and Capacity Demand Reduction Induced Price Effects (DRIPE' <br> Total Benefits <br> its |  |  | $38,006,065$ $10,702,060$ 818,599 $\$$ $17,069,240$ $\mathbf{\$} 8$ | 945,754 $\mathbf{\$}$ 256,486 712,143 $\$$ 403,786 $\mathbf{\$}$ 191,438 839,864 $\$$ $4,061,908$ $\mathbf{7 , 4 1 1 , 3 7 9}$ |  |  | $\begin{array}{r} 9,260,849 \\ 921,666 \\ \$ \\ 1,085,765 \\ 4,470,654 \\ 1,126,828 \\ \$ \\ 4,428,382 \\ \hline 26,844,718 \\ 48,138,863 \end{array}$ |  | $\left.\begin{array}{r}751,256 \\ \hline\end{array} \begin{array}{r}\$ \\ \\ 49,315 \\ 218,184 \\ \$ \\ 321,546 \\ \$ \\ 101,876 \\ \$ \\ 277,872\end{array}\right) \$$ |  | $\begin{array}{rr}1,947,631 & \$ \\ 269,574 & \$ \\ 99,068 & \$ \\ 873,747 & \$ \\ 231,627 & \$ \\ 1,093,936 & \$ \\ 5,187,007 & \$ \\ 9,702,591 & \$\end{array}$ |  | $\$$ 725,509 $\$$ <br> $\$$ 253,856 $\$$ <br> $\$$ 525,964 $\$$ <br> $\$$ 266,239 $\$$ <br> $\$$ 150,533 $\$$ <br> $\$$ 774,909 $\$$ <br> $\$$ $1,230,747$ $\$$ <br> $\$$ $3,927,756$ $\$$ |  | 805,779 151,935 <br> 151,935 <br> 403,075 <br> 95,771 573,296 <br> $8,871,671$ |
|  |  |  | 发 10.67 .152 s |  |  |  | $\begin{array}{r} 18,919 \\ 416,401 \\ 614,514 \end{array}$ |  | $\begin{aligned} 1,627,064 & \$ \\ 6,141,692 & \$ \\ 11,486,422 & \$ \end{aligned}$ |  |  | cose |  |  |  |  |
| tal | Cost Test (SC) |  | nes | ${ }^{\text {a }}$ | m | Taymestay | memat | , meames | mortc | s | men | Mutamiv |  |  | mamay |  |
|  |  <br> 37 Avoided Wholesale Electric Capacity Costs <br> 39 Electric Energy and Capacity Demand Reduction Induced Price Effects (DRIPE' <br> 41 Avoided RPS REC Purchase Costs 42 Avoided Wholesale Volatility Costs <br> 43 Avoided Transmission and Distribution Costs <br> 44 Avoided $\mathrm{CO}_{2}$ Emissions Damages 45 Avoided $\mathrm{SO}_{2}+$ NOx Emissions Damages <br> 45 Avoided $\mathrm{SO}_{2}+$ NOx Emissions Damages 46 Job and Energy Savings Economic Value-Added Multiplier Benefits Total Benefits |  |  |  | $\left.\begin{array}{r}1,380,079 \\ 407,290 \\ 1,098,121 \\ 1,302,273 \\ 3,411 \\ 5 \\ 557,672 \\ 288,549 \\ 323,535 \\ 1, \$ \\ 1,642,926 \\ 1,325,572\end{array}\right\}$ |  |  |  |  |  |  |  |  |  |  |     <br> $\$$ 954,860 $\$$ - <br> $\$$ 190,963 $\$$ - <br> $\$$ - $\$$ - <br> $\$$ 705,846 $\$$ - <br> $\$$ - $\$$ - <br> $\$$ 477,272 $\$$ - <br> $\$$ 114,582 $\$$ - <br> $\$$ 160,616 $\$$ - <br> $\$$ 817,833 $\$$ - <br> $\$$ 853,019 $\$$ - <br> $\$$ $9,008,020$ $\$$ $3,984,486$ <br> $\$$ $13,283,011$ $\$$ $\mathbf{3 , 9 8 4 , 4 8 6}$ |
|  |  |  |  |  |  |  |  |  | $\begin{array}{r} 4,606,149 \\ 1,759,166 \\ 6,365,316 \end{array}$ | $\begin{array}{r} 10,231,229 \\ 2,147,102 \\ 12,378,331 \end{array}$ | $\begin{array}{ll} 9,934,713 & \$ \\ 2,480,560 & \$ \\ 12,415,272 & \$ \end{array}$ | $\begin{aligned} 2,745,940 & \$ \\ 646,328 & \$ \\ 3,392,269 & \$ \end{aligned}$ |  |  |  | $\begin{array}{rlr} 664,839 & \$ & - \\ 1,239,144 & \$ 2,748,146 \\ 1,903,983 & \$ & 2,748,146 \end{array}$ |
|  | New Jersey Test (NNT) |  | ${ }^{\text {ass }}$ | ${ }^{\text {c11 }}$ | m | , masematay | memes | maem | manc | nus | memen | s | $\begin{aligned} & \text { Energy Solutions for } \\ & \text { Business: Prescriptive } \\ & \text { and Custom } \end{aligned}$ |  | naman |  |
|  | 49 Avoided Wholesale Electric Energy and Electric Ancillary Costs <br> 50 Avoided Wholesale Electric Capacity Costs <br> 52 Electric Energy and Capacity Demand Reduction Induced Price Effects (DRIPE; <br> 53 Avoided Transmission and Distribution Costs <br> 55 Non-Energy Benefits (5\%) <br> 56 Low-Income Benefits ( $10 \%$ ) Total Benefits <br> Total Benefits |  |  |  |  |  |  |  |  | $\begin{array}{crc} \hline & & \\ \$ & 1,079,028 & \$ \\ \$ & 75,044 & \$ \\ \$ & 314,109 & \$ \\ \$ & 403,489 & \$ \\ \$ & 3,245,407 & \$ \\ \$ & 972,596 & \$ \\ \$ & 255,854 & \$ \\ \$ & - & \$ \\ \$ & 6,345,528 & \$ \end{array}$ | $1,380,079$ 407,290 $\quad \$$ | $\begin{array}{r} 2,701,124 \end{array} \mathbf{\$} \begin{array}{r} 401,737 \\ 145,978 \\ \$ \\ 1,571,751 \end{array} \$ \$$ |  |  |  | 954,860 190,963 - 705,846 806,097 817,833 132,888 - $3,608,487$ |
|  |  |  |  | $\begin{array}{r} 32,904,917 \\ 13,998,359 \\ 46,903,276 \end{array}$ |  | $\begin{array}{r} 67,964,773 \\ 31,215,229 \\ 99,180,002 \end{array}$ |  |  | $\begin{array}{r} 4,606,149 \\ 1,759,166 \\ 6,365,316 \end{array}$ | $\begin{array}{r} 10,231,229 \\ 2,147,102 \\ 12,378,331 \end{array}$ |  |  |  | $\begin{aligned} & 2,115,231 \\ & 1,095,087 \end{aligned}$ $\begin{array}{r} 1,095,087 \\ 3,210,317 \end{array}$ |  | $\begin{array}{rlr} 664,839 & \$ & - \\ 1,239,144 & \$ & 2,748,146 \\ 1,903,983 & \$ & 2,748,146 \\ 1.9 & 0.0 \end{array}$ |

## Schedule (BJB)-5

Any information claimed to be confidential contained in Schedule (BJB)-5 of Company Witness Baatz will be provided upon execution of an Agreement of Non-Disclosure of Information (the "NDA") by the parties to this proceeding. The NDA will follow once a docket number has been assigned.

# Atlantic City Electric Company Energy Efficiency Filing <br> CBA Workpapers 

Will be provided after the execution of an NDA.

## Schedule (BJB)-6

Atlantic City Electric Company
Energy Efficiency Filing
Emissions Avoided Results Summary

| Subprogram | $\mathrm{CO}_{2}$ Emissions <br> Reduction (tons) | SO <br> Reduction (tons) | NOx Emissions <br> Reduction (tons) |
| :--- | ---: | ---: | ---: |
| Home Energy Reports | 5,297 | 3 | 3 |
| Efficient Products | 252,875 | 144 | 137 |
| Existing Homes QHEC | 115,687 | 70 | 61 |
| Existing Homes HPwES | 24,593 | 12 | 14 |
| Moderate Income Weatherization | 43,991 | 16 | 28 |
| Multi-Family | 50,992 | 31 | 27 |
| Energy Solutions for Business: Prescriptive and Custom | 691,711 | 472 | 350 |
| Energy Solutions for Business: Engineered Solutions | 35,726 | 14 | 23 |
| Direct Install | 223,382 | 111 | 130 |
| Energy Solutions for Business: Energy Management | 18,524 | 11 | 9 |
| Total | $\mathbf{1 , 4 6 2 , 7 7 9}$ | $\mathbf{8 8 5}$ | $\mathbf{7 8 3}$ |

## Schedule (BJB)-7

Atlantic City Electric Company
Energy Efficiency Filing
Economic Development and Job Creation Results Summary
Table BJB-2.1 Nominal Economic Impacts of ACE Portfolio

| Subprogram | Value Added <br> to GDP (NPV) | Value Added <br> to GDP <br> (Nominal) |
| :--- | ---: | ---: |
| Home Energy Reports | 772,233 | 826,267 |
| Efficient Products | $46,369,588$ | $70,880,292$ |
| Existing Homes QHEC | $22,315,366$ | $34,403,667$ |
| Existing Homes HPwES | $6,126,438$ | $8,443,446$ |
| Moderate Income Weatherization | $10,054,771$ | $14,442,221$ |
| Multi-Family | $9,541,228$ | $15,993,084$ |
| Energy Solutions for Business: Prescriptive and Custom | $133,291,217$ | $249,295,296$ |
| Energy Solutions for Business: Engineered Solutions | $8,012,309$ | $20,378,958$ |
| Direct Install | $44,266,297$ | $75,474,767$ |
| Energy Solutions for Business: Energy Management | $7,906,449$ | $10,038,308$ |
| Portfolio Costs | $3,746,485$ | $4,191,365$ |
| Total | $292,402,381$ | $504,367,670$ |

Table BJB-2.2 Anticipated Job Creation Impacts

| Subprogram | Direct Job <br> Creation | Indirect + <br> Induced Job <br> Creation | Total Job <br> Creation |
| :--- | ---: | ---: | ---: |
| Home Energy Reports | 0 | 7 | 7 |
| Efficient Products | 138 | 649 | 787 |
| Existing Homes QHEC | 46 | 270 | 317 |
| Existing Homes HPwES | 82 | 81 | 163 |
| Moderate Income Weatherization | 61 | 64 | 125 |
| Multi-Family | 20 | 130 | 150 |
| Energy Solutions for Business: Prescriptive and Custom | 1,831 | 1,473 | 3,304 |
| Energy Solutions for Business: Engineered Solutions | 108 | 98 | 206 |
| Direct Install | 508 | 398 | 906 |
| Energy Solutions for Business: Energy Management | 48 | 38 | 85 |
| Portfolio Costs | 17 | -5 | 12 |
| Total | 2,860 | 3,202 | 6,062 |

## Schedule (BJB)-8

Atlantic City Electric Company
Energy Efficiency Filing
Cost to Achieve Results

| Sector | Cost to Achieve <br> (\$/first year <br> $\mathrm{kWh})$ |
| :--- | ---: |
| Residential | 0.47 |
| Commercial and Industrial | 0.31 |
| Multi-Family | 0.51 |
| Low-to-Moderate Income | 2.19 |

> Direct Testimony of Michael T. Normand

## ATLANTIC CITY ELECTRIC COMPANY

BEFORE THE NEW JERSEY<br>BOARD OF PUBLIC UTILITIES DIRECT TESTIMONY OF MICHAEL T. NORMAND BPU DOCKET NO.<br>$\qquad$

Q1. Please state your name and position.
A1.
My name is Michael Normand. I am the Manager of Rate Administration for Atlantic City Electric Company ("ACE") and Delmarva Power \& Light Company ("Delmarva Power") in the Regulatory Affairs Department of Pepco Holdings LLC ("PHI"). I am providing this Direct Testimony on behalf of ACE.

Q2. What are your responsibilities in your role as Manager of Rate Administration?
A2. I am primarily responsible for the development of electric rates, including tariff surcharges, for ACE. I also participate in the development of PHI's policies and practices with respect to rate design and assist with regulatory compliance matters in other PHI jurisdictions, including tariff administration and periodic filings.

Q3. Could you please describe your educational and professional background and experience?

A3. In 2008, I graduated from West Virginia University with a Bachelor of Science degree in Business Administration with a major in finance. In 2016, I received a Master of Science degree in finance from Northeastern University. Beginning in 2008, I was employed at Management Applications Consulting Inc. where I was involved in various state regulatory proceedings. My responsibilities included load research, allocation factor development, marginal cost-of-service, embedded cost-of-service, witness support, and various special cost of service analyses.

In 2011, I joined the Regulatory Department of PHI as a Regulatory Analyst. My responsibilities included witness support and cost of service study development. In 2012, I was promoted and was a Class Cost of Service ("CCOSS") witness for Delmarva Power Delaware gas operations. Following this promotion, I have developed and testified to several CCOSS' for the operating utilities of PHI. This includes Delmarva Power's Maryland electric operations and Delaware gas operations, as well as Pepco’s Maryland and District of Columbia operations. In early 2017, I transferred to the Revenue Requirements team for ACE and Delmarva Power. In early 2019, I was promoted to my current position.

## Q4. What is the purpose of your Direct Testimony?

A4. The purpose of my Direct Testimony is to provide an overview of the proposed revenue requirement, rate design, and cost recovery mechanism associated with the proposed Energy Efficiency Program Portfolio ("EE Program"), which is detailed in the Direct Testimony of Company Witness Baatz. Additionally, I will provide an overview of the proposed modified Conservation Incentive Plan ("CIP") ${ }^{1}$, which is a mechanism designed to recover lost revenues as a result of the proposed energy efficiency programs.

## Q5. How is your Direct Testimony organized?

A5.
My Direct Testimony is organized as follows, with respect to the proposed EE Program, I will discuss the proposed cost recovery mechanism ("CRM") and its corresponding estimated impact on all rate classes, followed by a discussion of the CIP that will include an overview of the lost revenue recovery mechanism and the corresponding

[^49]tests required to avoid utility overcollection and its estimated impact on all rate classes. My Direct Testimony and accompanying schedules were prepared by me or under my direct supervision and control. The source documents for my Direct Testimony are Company records and public documents. I also rely upon my personal knowledge and experience.

## Q6. Please summarize the schedules presented in your testimony.

A6. The schedules presented with my testimony are organized as follows:

- Schedule (MTN)-1 provides the EE Program CRM which includes: revenue requirement for Years 1 through 3, the development of the EE Program surcharge rate for Years 1 through 3, and the EE Program deferral model;
- Schedule (MTN)-2 provides the monthly bill impact of the proposed EE Program surcharge in the major service classifications across a range of monthly consumption levels;
- Schedule (MTN)-3 provides the proposed CIP model and workpapers that includes ACE specific data as an illustrative example;
- Schedule (MTN)-4 provides the EE program tariff, Rider "EE"; and
- Schedule (MTN)-5 provides the CIP program tariff, Rider "CIP."


## EE Program Cost Recovery Mechanism

Q7. Please provide a summary of the program types and related costs to be recovered through the CRM.

The EE Portfolio will include various programs designed to achieve electricity savings in New Jersey and decrease energy burdens for all ratepayers. The programs will include measures such as home energy audits and other energy management solutions


Efficient Products
Existing Buildings QHEC
Existing Buildings HPwES
Moderate Income Weatherization
Multi-Family
Energy Solutions for Business: Prescriptive and Custom
Energy Solutions for Business: Engineered Solutions
Energy Solutions for Business: Direct Install
Energy Solutions for Business: Energy Management
Demand Response
Portfolio Costs
Program Planning Costs
Inflows from Gas Utilities

| Regulatory Asset |  | Direct Property, Plant \& Equipment | Direct <br> O\&M <br> Expenses | Total |
| :---: | :---: | :---: | :---: | :---: |
| Direct Costs | Shared Costs | (IT Related) |  |  |
| 480,500 | - |  | 22,494 | 502,994 |
| 11,050,138 | $(1,938,294)$ | 1,000,000 | 3,712,835 | 13,824,679 |
| 8,728,495 | $(780,330)$ |  | 242,316 | 8,190,480 |
| 8,438,083 | $(3,245,044)$ |  | 546,023 | 5,739,062 |
| 12,035,585 | $(7,650,061)$ |  | 1,378,652 | 5,764,176 |
| 3,484,367 | $(435,106)$ |  | 272,857 | 3,322,118 |
| 11,271,974 | - |  | 405,576 | 11,677,550 |
| 1,850,435 | $(1,076,856)$ |  | 898,947 | 1,672,526 |
| 27,464,564 | $(8,736,844)$ |  | 433,790 | 19,161,510 |
| 1,969,108 | - |  | 60,815 | 2,029,923 |
| - | - |  | - | - |
| - | - | 750,000 | 2,125,000 | 2,875,000 |
| 577,310 |  |  |  | 577,310 |
|  | 8,446,307 |  | - | 8,446,307 |
| 87,350,558 | $(15,416,228)$ | 1,750,000 | 10,099,305 | 83,783,634 |

## Q8. What types of investment costs and operating and maintenance ("O\&M") costs will

 be recovered?A8. Only incremental investment and incremental O\&M costs associated with or created by the proposed programs will be recovered through the CRM. Embedded costs incurred to provide the services under the proposed programs are treated as normal costs of service and recovery would be established during a base rate case proceeding. Incremental investment costs will be capitalized as a regulatory asset and amortized over a
period of 10 years in accordance with page 26 of the BPU Order issued on June 10, 2020 in BPU Docket Nos. Q01901040, Q019060748, and Q017091004 (the "June $10^{\text {th }}$ Order"). The annual amortization amounts will be allocated by month using the projected monthly kWh sales as a percentage of the total projected kWh sales for the year. Projected system related capital expenditures are modeled to close to Property, Plant and Equipment at the inception of the EE Program and will be amortized and recovered over a period of five years, consistent with guidelines for Intangible Plant. The incremental O\&M costs will be expensed and included within the CRM model for recovery on an annual basis.

Q9. Is the Company seeking recovery of any incremental program planning costs incurred prior to the expected implementation date of July 1, 2021?

A9. Yes. The Company is seeking recovery of $\$ 577,310$ for program planning costs associated with the initial research and development of the EE Program Plan. These incremental program related costs have all been invoiced and recorded as of August 31, 2020.

Q10. Is the Company seeking a return on equity ("ROE") in the determination of its carrying costs for program investments?

A10.
Yes. In accordance with page 26 of the June $10^{\text {th }}$ Order, "Staff recommends that the carrying costs for program investments use the capital structure established in each utility's most recent base rate case, incorporating both the cost of debt and the ROE. Staff recommends no basis point reduction on the ROE in order to recognize EE's importance compared to traditional utility investments." Therefore, a return on the unamortized balance (net of accumulated deferred income taxes) will be calculated using the Company's authorized rate of return, as approved by the BPU in its March 13, 2019 Order in Docket

No. ER18080925, and stated on page 3 as follows: "The Signatory Parties agree that, for the purposes of resolving this proceeding, the Company shall have an overall rate of return of 7.08 percent, which is based on a capital structure consisting of 49.94 percent equity with a cost rate of 9.60 percent, and 50.06 percent long-term debt with a cost rate of 4.58 percent." Detail calculations of the 7.08 percent overall rate of return and the 6.44 percent after-tax rate of return can be found in Schedule (MTN)-1. The Company will not earn a return on the O\&M expenses that will be recovered on an annual basis.

Q11. Will the Company reduce/increase its incremental investment costs by amounts received from/paid to other EDCs or GDCs as a result of savings from dual fuel measures?

A11. Yes. Each utility is responsible for meeting the energy efficiency targets set by the BPU as a result of the Clean Energy Act of 2018. Therefore, both an electric and gas utility in the same shared service territory will be targeting the same customers for energy efficiency projects/programs. Some of these projects/programs will involve the installation of dual fuel measures that will produce both electric and gas savings. Further, some projects will involve the installation of measures that result in both electric and gas measures but are more efficient and easier for the customer if done through one utility. As a result, the jointly contracted Program Coordinator will evaluate the utility investment for these shared projects and allocate any dual fuel savings to the appropriate electric or gas utility. The rebates/incentives will be shared among the electric and gas utility in the service territory based on the allocation of electric to gas savings as determined by the Program Coordinator. For cost savings reimbursements received from another EDC or GDC, the Company will reduce its investment to be recovered on a prospective basis. For
cost savings reimbursements paid to another EDC or GDC, the Company will increase its investment to be recovered on a prospective basis. There are no cost sharing arrangements related to O\&M expenses recovered on an annual basis.

## Q12. Will there be sharing of financing costs for dual fuel measures in shared service territories?

A12.
Yes. In cases where there is a project that includes both fuels or dual fuel measures and savings, the following scenarios will be used for cost allocation of financing. For purposes of the bullet points listed below, the lead utility refers to the utility completing the project directly with the customer, while the partner utility refers to the utility sharing costs/benefits from the project associated with the same customer.

- If the lead utility and partner utility both offer financing (either on- or offbill) to their customers, the lead utility will handle all payment interactions with the customer and will allocate a portion of the financing amount to the partner utility based upon the same pre-determined electric and gas proportional allocation factors used to allocate incremental investment costs such as rebates (see A10. above). Upon receiving repayments from the customer, the lead utility will allocate the appropriate portion of the monthly repayments to the partner utility again based upon the predetermined electric and gas proportional allocation factors.
- If the lead utility and partner utility both offer financing through a thirdparty with a buy-down of third-party interest, the lead utility will allocate a portion of the third-party interest buy-down cost to the partner utility based upon the pre-determined electric and gas proportional allocation factors.
- If the lead utility offers financing (either on- or off-bill) and the partner utility offers financing from a third-party with a buy-down of the third-party interest, the lead utility will handle all payment interactions with the customer and retain the entire financing amount and all associated costs (i.e., no allocation).
- If the lead utility offers financing through a third-party with a buy-down of third-party interest and the partner utility offers financing (either on- or offbill), the lead utility will allocate a portion of the third-party interest buydown cost to the partner utility based upon the pre-determined electric and gas proportional allocation factors.

ACE intends to offer financing through a third-party with a buy-down of third-party interest. The details related to the financing are outlined in the Direct Testimony of Company Witness Baatz. Similar to the savings allocation discussed in Answer A. 11 above, financing reimbursements received from another EDC or GDC will be recorded as a reduction to the investment to be recovered on a prospective basis; financing reimbursements paid to another EDC or GDC will be recorded as an increase to the investment to be recovered on a prospective basis. There are no financing arrangements related to O\&M expenses recovered on an annual basis.

## Q13. Will there be incentives/penalties during the first three Program Years for the utilities based on performance against quantitative performance indicators ("QPIs")?

A13.
No. Pursuant to page 28 of the June $10^{\text {th }}$ Order, the Clean Energy Act does not mandate utility achievement of energy use reductions until after Program Year 5. Accordingly, awards of incentives and assessments of penalties will not begin until after
the conclusion of Program Year 5. At that time, any incentives or penalties will be based on Program Year 5 performance.

## Q14. How will the revenue requirement and surcharge be calculated under the CRM?

A14. The surcharge will be designed on a dollar per kilowatt-hour ("kWh") basis, applicable equally to all Rate Schedules. ${ }^{2}$ The surcharge rate will be set annually based upon budgeted and actual expenditures through annual utility Board filings, subject to BPU approval. The revenue requirement is designed to recover the annual depreciation and amortization of capital and investments, plus carrying costs at the Board approved rate of return, and annual O\&M expenses and a true-up for any prior period over-/under-recovery. As previously stated, the revenue requirement calculated will be net of any cost sharing reimbursements. The CRM, including detailed calculations of the revenue requirement and rate design, is attached as Schedule (MTN)-1.

## Q15. How will the prior period over-/under-recovery balances be tracked?

A15. Any differences between the forecasted monthly revenue requirement and the actual monthly EE related sales revenue will be tracked as a deferred balance (regulatory asset or regulatory liability). The Company is requesting that monthly interest be applied to any over/under recovery deferral balances. In calculating monthly interest, the Company is proposing the monthly interest rate be based upon the Company's short-term debt rate which is associated with the monthly weighted average of commercial paper issued, or if no short-term debt is outstanding, the rate on equivalent temporary cash investments. The interest shall not exceed ACE's overall rate of return as authorized by the Board in the Company's most recent base rate case. Additionally, the calculation shall be based on the

[^50]net of tax beginning and ending average monthly balance. The Company shall continue accruing simple interest with an annual roll-in at the end of each reconciliation period.

## Q16. Please discuss the impact of the EE Program on customer rates.

A16. The Company estimates that a typical residential customer on Basic Generation Service ("BGS") service using 679 kWh per month would see a bill increase of $\$ 0.30$ cents or $0.23 \%$, from 132.16 to 132.46 for the first year of the EE Program. This includes recovery of the items noted in Answer A. 14 above. The complete bill impact analysis for all Rate Schedules and its underlying assumptions are set forth in Schedule (MTN)-2. This rate impact will be mitigated by the beneficial impacts of the energy efficiency measures on the cost of electricity overall, as quantified in detail by the benefit/cost analysis of Company Witness Baatz.

## Q17. How is recovery for the EE Program anticipated for the subsequent periods?

A17. The table below provides a timeline of proposed filings for Program Years 1 through 3, including a true-up for recovery of prior period over/under deferred balances. The charges proposed in the annual filings made by March 1 of each year will go into effect provisionally or as final rates, on July 1 of the current year, upon issuance of a Board Order authorizing these provisional or final rates.

$\left.$| ACE EE Program Rate Filing Schedule |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |
| Program <br> Year | Filing <br> (On or About) | Projected <br> Spending <br> Through | True-Up of Prior <br> Period Actuals |  | | Rates |
| :---: |
| Effective | \right\rvert\, | 1 |  |  |  |
| :--- | :--- | :--- | :--- |
| (Initial | This Petition | June 30, 2022 | N/A |

2

3
March 1, 2023 June 30, 2024

July 1, 2021
through December July 1, 2022 31, 2021

January 1, 2022
through December July 1, 2023 31, 2022

## Tariffs

Q18. Please list the tariffs and workpapers that you are sponsoring.
A18. Illustrative tariff sheets showing the proposed terms, conditions, and rates applicable to the EE Program, Rider "EE," and provided for through the instant Petition are set forth in Schedule (MTN)-4.

## Conservation Incentive Program

Q19. Please discuss the proposed treatment for the Company's potential lost revenues associated with energy efficiency and price response demand.

A19. The June $10^{\text {th }}$ Order on pages 26 and 27 describes two methods for potential lost revenue treatment. They are (1) a lost revenue adjustment mechanism ("LRAM") and the modified CIP. Both mechanisms permit the Company to recoup lost revenues associated with the Company's EE portfolio.

Q20. Why are either the LRAM or CIP mechanisms essential to implementing the EE Programs?

A20. The EE Programs seek to reduce customer's kWh usage and peak kW demand. This, in effect, would reduce the Company's revenues and thus the recovery of and on its investments. A significant portion of the Company's base distribution revenues are derived from kWh volumetric rates and kW demand rates. Both the LRAM and CIP would allow ACE to maintain its revenues from Board-approved base distribution rate cases and thus
maintain cost recovery of the Company's revenue requirement and removing the disincentive for investing in EE Programs.

## Q21. What mechanism does ACE propose?

A21. The Company proposes and seeks to establish a modified CIP mechanism. This is supported by the June $10^{\text {th }}$ Order on page 75: "Given strong stakeholder support for the CIP and successful experience with it by the State and participating utilities, Staff recommends that the utilities continue to be able to utilize or propose participation in the CIP, with modifications to make the CIP applicable to all of the state's gas and electric public utilities. For any utility that does not agreed to a modified CIP, Staff recommends using the LRAM." The Company's proposed CIP mechanism is detailed in Schedule (MTN)-3. Although this schedule is illustrative, it provides the format and necessary calculations to model the CIP and any associated deferrals for future CIP recovery filings.

## Q22. Please describe the modified CIP proposed by the Company.

A22. The modified CIP creates an adjustment to customers' bills that is designed to reflect differences between Board-approved base distribution revenue levels and actual base distribution revenues. This proposal provides for a matching of revenues with the corresponding amounts that the Board has approved as adequate compensation for providing electric service. The CIP complements the CRM program that the Company is setting out to achieve by allowing the Company to increase energy efficiency investments set out by the State of New Jersey, while also reducing customers' sales and demands.

## Q23. What rate schedules would be subject to the CIP mechanism?

A23. The CIP would apply to rate schedules RS, MGS Secondary, MGS Primary, AGS
Secondary, AGS Primary, and TGS. The CIP would not be applicable for rate schedules
DDC, TS, SPL, and CSL.

## Q24. Please detail how Schedule (MTN)-3 would determine a lost revenue adjustment associated with the CRM Program.

A24.
First, the CIP determines the baseline revenue per customer. This is established from the Company's most recent base rate case, BPU Docket No. ER18080925. Utilizing the approved level of base distribution revenue and billing determinants from this proceeding, an average revenue per customer by month for each rate schedule is determined. ,This monthly baseline revenue per customer includes the margin revenue from base distribution kWh volumetric charges and kW demand charges for the applicable rate schedules. For instance, the residential class does not have a demand charge and the monthly average revenue per customer only utilizes kWh charge revenues, while the MGS Secondary rate schedule includes kWh charge and kW charge revenues.

Second, the allowed margin is calculated. The allowed margin is the allowed level of revenue utilizing the baseline revenue per customer by month multiplied by the number of customers in each month for all 12 months of the recovery period. Although illustrative, see Schedule (MTN)-3.

Third, the actual revenue per customer is calculated as the actual booked monthly revenue by rate schedule. Consistent with the baseline revenue per customer the actual revenue per customer includes only the applicable kWh and kW charge revenue. The actual monthly revenue is then divided by the number of customers in that month. The difference between the actual and baseline revenue per customer, multiplied by the actual number of
customers for that month, will determine the revenue adjustment for that month. This is done individually for each rate schedule.

The sum of each monthly revenue adjustment for the 12-month recovery period of actuals for all applicable rate schedules determines the total revenue adjustment.

## Q25. Are weather impacts removed from the total revenue adjustment?

A25. Yes. Consistent with the weather normalization adjustment calculated in an ACE base rate case, the difference between actual kWh sales and weather normalized kWh sales are the "weather effect" on sales. The weather effect is then multiplied by average monthly rate to determine a revenue adjustment. This is then removed from each class's total revenue adjustment to determine a non-weather adjustment. A 75\% factor is applied to the non-weather adjustment and this is the basis for some of the customer protections described below.

## Q26. Are there protections to ACE customers regarding the CIP?

A26. Yes. There are four customer protections:

1. Earnings Test;
2. Variable Margin Test;
3. Modified Basic Gas Supply Service ("BGSS") Savings Test; and
4. Shareholder Contribution.

## Q27. Please describe the Earnings Test.

A27. The earnings test ensures that the CIP will not allow ACE to over-earn. For any given CIP recovery period, the average of the beginning and ending equity balance and the net income from the most recent GAAP financial quarterly report will be utilized to determine the ROE. The threshold for this test is ACE's most recent Board-approved ROE
from a base distribution rate case plus 50 basis points. Currently, ACE's Board-approved ROE is $9.60 \%$.

## Q28. Please describe the Variable Margin Test.

A28. The variable margin test limits the amount revenues can increase. The intent of this test is to limit the impact to customer bills for any given recovery period. This test is calculated as the allowed margin described above multiplied by 6.5\%.

## Q29. Please describe the Modified BGSS Savings Test.

A29. This test limits the CIP to the amount of capacity savings. There are three components to this test to determine the overall capacity savings: (1) permanent capacity savings, (2) additional capacity BGS savings, and (3) avoided cost BGS savings. The permanent capacity savings utilize the final zonal unforced capacity ("UCAP") obligation for ACE in the 2010/2011 and 2019/2020 load years. Additional capacity savings will utilize the most recent year-over-year UCAP. Currently, this is for the 2019/2020 and 2020/2021 load years. Finally, the avoided capacity is calculated utilizing the base year unforced capacity per customer multiplied by the prevailing monthly capacity rate multiplied by the difference in the current monthly number of customers compared to the baseline year number of customers. This is done for each rate schedule. The sum total of each of these three components determines the threshold for the modified BGSS savings test and is detailed in Schedule (MTN)-3.

## Q30. Please describe the Shareholder Contribution.

A30. The shareholder contribution allows shareholders to "have skin in the game." This is achieved by having ACE spend shareholder capital "below the line" on an annual basis for each year the CIP is in place. The shareholder contribution will not be sought for
recovery. If at a future date the CIP is no longer active or the Company does not make a CIP filing, a shareholder contribution will not be required. ACE proposes a shareholder contribution of $\$ 275,000$.

## Q31. Please discuss the CIP annual filing and deferral.

A31. $\quad$ Schedule (MTN)-3 is the basis for the CIP deferral model and future CIP filings with the Board. The difference between the baseline revenue per customer and actual revenue per customer as described above will be tracked and any over or under amount from baseline will be included in the annual CIP filing. Each applicable rate schedule would have its own CIP surcharge rate that would be set using either forecasted kWh sales or forecasted kW demand. The second CIP filing and each subsequent filing would also contain any true-up amounts from the previous period in determining the new surcharge rate by rate schedule.

## Q32. Do you propose a CIP tariff?

A32. Yes, Schedule (MTN)-5 is the proposed CIP tariff, Rider "CIP".

## Q33. Does this conclude your testimony?

A33. Yes, it does.

## Schedule (MTN)-1

## ACE <br> Energy Efficiency and Demand Response Surcharge

Residential and Commercial Energy Efficiency Programs

## SECTION I ACE EE DR SURCHARGE CALCULATION

Table 1 - Summary of Revenue Requirement and Annual Charge
2022 (July 1, 2021 - June 30, 2022) Summary
Forecasted 10 Year Amortization (Straight Line)
Forecasted 5 Year Amortization (Straight Line)
Forecasted CCRF
Forecasted O\&M Expense
Forecasted PJM Market Revenues
Forecasted Fed Tax credit
Prior Period True Up
Total Annual Amount to be Recovered
Retail Sales - kwh
\$/KWH Surcharge
BPU/RC Assessment
\$/KWH Surcharge with SUT
551,048 Table 3, Col 6
350,000 Table 3, Col 7
498,797 Table 3, Col 17
2,114,285 Table 3, Col $18+$ Col 19

Bill Impact (Residential)
BRC Docket No. ER18080925
679 kWh Avg
0.300000

## ACE <br> Energy Efficiency and Demand Response Surcharge

Residential and Commercial Energy Efficiency Programs

## SECTION I ACE EE DR SURCHARGE CALCULATION

Table 1 - Summary of Revenue Requirement and Annual Charge
2023 (July 1, 2022 - June 30, 2023) Summary
Forecasted 10 Year Amortization (Straight Line)
Forecasted 5 Year Amortization (Straight Line)
Forecasted CCRF
Forecasted O\&M Expense
Forecasted PJM Market Revenues
Forecasted Fed Tax credit
Prior Period True Up
Total Annual Amount to be Recovered

| 2,316,232 | Table 3, Col 6 |
| ---: | :--- |
| 350,000 | Table 3, Col 7 |
| 1,544,413 | Table 3, Col 17 |
| $3,694,640$ | Table 3, Col $18+$ Col 19 |
| - | Table 3, Col 20 |
| - | Table 3, Col 14 |
| $(187)$ | Table 5, Col 6 |
| $7,905,099$ |  |

Retail Sales - kwh
\$/KWH Surcharge
BPU/RC Assessment
8,477,753,724 Table 2
\$/KWH Surcharge with SUT
0.000932
0.000002
0.000996

Bill Impact (Residential; cumulative impact of Program Years 1 and 2 combined)
BRC Docket No. ER18080925 679 kWh Avg
0.680000

## ACE <br> Energy Efficiency and Demand Response Surcharge

Residential and Commercial Energy Efficiency Programs

## SECTION I ACE EE DR SURCHARGE CALCULATION

Table 1 - Summary of Revenue Requirement and Annual Charge
2024 (July 1, 2023 - June 30, 2024) Summary
Forecasted 10 Year Amortization (Straight Line)
Forecasted 5 Year Amortization (Straight Line)
Forecasted CCRF
Forecasted O\&M Expense
Forecasted PJM Market Revenues
Forecasted Fed Tax credit
Prior Period True Up
Total Annual Amount to be Recovered

| 5,233,764 | Table 3, Col 6 |
| :---: | :--- |
| 350,000 | Table 3, Col 7 |
| 3,155,169 | Table 3, Col 17 |
| 4,290,380 | Table 3, Col $18+$ Col 19 |
| - | Table 3, Col 20 |
| - | Table 3, Col 14 |
| (368) | Table 5, Col 6 |

Retail Sales - kwh
$\$ /$ KWH Surcharge
BPU/RC Assessment
8,45,155,385 Table 2
0.001540
\$/KWH Surcharge with SUT
0.000004
0.001647

Bill Impact (Residential; cumulative impact of Program Years 1, 2 and 3 combined)

| BRC Docket No. ER18080925 | 679 kWh Avg | 1.120000 |
| :--- | :--- | :--- |

## 

SECTION I Forecasteo vear amortization scheolle

|  |  | ${ }^{2022}$ |  |  |  |  |  |  |
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| wn |  | 8,465,988 | Toaamwn |  | 8,477,54 | Toal mwn |  | ${ }_{8,459,155}$ |









ACE
Residential and Commercial Energy Efficiency and Demand Response Surcharge
IT Capital Investment

| Capitalized IT Costs |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) | (13) |
|  | CWIP <br> Beginning Balance | CWIP <br> Capital Expenditures | Cumulative CWIP \% Transferred Into Service | CWIP <br> Transferred Into Service | CWIP <br> Balance | AFUDC Rate Equity | AFUDC Rate Debt | AFUDC Rate Total | AFUDCEquity | AFUDCDebt | AFUDC | CWIP <br> Ending <br> Balance | IT Capital Program Investment |
| $\begin{array}{r} \text { Jun-21 } \\ \text { Jul-21 } \end{array}$ | \$1,750,000 | \$0 | 100\% | \$1,750,000 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$1,750,000 | \$1,750,000 |
| Aug-21 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Sep-21 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Oct-21 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Nov-21 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Dec-21 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Jan-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Feb-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Mar-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Apr-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| May-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Jun-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Jul-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Aug-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Sep-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Oct-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Nov-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Dec-22 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Jan-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Feb-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Mar-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Apr-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| May-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Jun-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Jul-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Aug-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Sep-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Oct-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Nov-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Dec-23 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Jan-24 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Feb-24 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Mar-24 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Apr-24 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| May-24 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
| Jun-24 | \$0 | \$0 | 0\% | \$0 | \$0 | 2.671\% | 1.664\% | 4.335\% | \$0 | \$0 | \$0 | \$0 | \$0 |
|  | Prev Col 12 | Input | Program Assumption | $\left\lvert\, \begin{gathered} (\mathrm{Col} 1+\mathrm{Col} 2)^{*} \\ \operatorname{Col} 3 \end{gathered}\right.$ | $\begin{gathered} \mathrm{Col} 1+\mathrm{Col} 2- \\ \mathrm{Col} 4 \\ \hline \end{gathered}$ | Input | Input | Col $6+\mathrm{Col} 7$ | $\begin{array}{\|c\|} =((\mathrm{Coll} 5+(\mathrm{Col} \\ 2 / 2)) \times(\mathrm{Col} \mathrm{6}) / \\ 12 \end{array}$ | $\begin{array}{\|c} =((\operatorname{Col} 5+(\operatorname{Col} \\ 2 / 2)) \times(\operatorname{Col} 7) / \\ 12 \end{array}$ | Col $9+$ Col 10 | $\begin{aligned} & \text { Col } 1+\operatorname{Col} 2- \\ & \operatorname{Col} 4+\operatorname{Col} 11 \end{aligned}$ | Col $4+\mathrm{Col} 13$ |

ACE
Residential and Commercial Energy Efficiency and Demand Response Surcharge
IT Capital Investment
Book vs. Tax Depreciation


| Book Depreciation (5 Years) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 |
| - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 |
| Tax Depreciation (3 Years) ${ }^{1}$ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 |
| - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 | 48,611 |


| Book/Tax Timing Difference | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| Monthly Deferred Tax Amount | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ |
| Cumulative Deferred Tax Amount | $(5,466)$ | $(10,932)$ | $(16,398)$ | $(21,863)$ | $(27,329)$ | $(32,795)$ | $(38,261)$ | $(43,727)$ | $(49,193)$ | $(54,658)$ | $(60,124)$ | $(65,590)$ | $(71,056)$ |

[^51]Oct-22 Nov-22 Dec-22 Jan-23 Feb-23 Mar-23 Apr-23 May-23 Jun-23 Jul-23 Aug-23 Sep-23 Oct-23 Nov-23 Dec-23 Jan-23 Feb-24


| $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ | $(19,444)$ |
| ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ | $(5,466)$ |
| $(87,453)$ | $(92,919)$ | $(98,385)$ | $(103,851)$ | $(109,317)$ | $(114,783)$ | $(120,248)$ | $(125,714)$ | $(131,180)$ | $(136,646)$ | $(142,112)$ | $(147,578)$ | $(153,043)$ | $(158,509)$ | $(163,975)$ | $(169,441)$ | $(174,907)$ |

$\begin{array}{llllllllllllllll}\text { Mar-24 Apr-24 } & \text { May-24 Jun-24 Jul-24 } & \text { Aug-24 } & \text { Sep-24 } & \text { Oct-24 } & \text { Nov-24 } & \text { Dec-24 } & \text { Jan-25 Feb-25 Mar-25 } & \text { Apr-25 } & \text { May-25 }\end{array}$


Aug-25 Sep-25 Oct-25 Nov-25 Dec-25 Jan-26 Feb-26 Mar-26 Apr-26 May-26 Jun-26 Jul-26


| $(0)$ |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | - | $(0)$ |
| 8,199 | 8,199 | 8,199 | 8,199 | 8,199 | 8,199 | 8,199 | 8,199 | 8,199 | 8,199 | 8,199 | - | $(0)$ |
| $(81,988)$ | $(73,789)$ | $(65,590)$ | $(57,391)$ | $(49,193)$ | $(40,994)$ | $(32,795)$ | $(24,596)$ | $(16,398)$ | $(8,199)$ | $(0)$ | $(0)$ |  |





ACE
Weighted Average Cost of Capital
BRC Docket No. ER18080925, Order dated 3/13/19 (Stipulation of Settlement)

| Capital Structure | Weight | Rate | Penaltyl Incentive ${ }^{1}$ | Weighted Rate | After <br> Tax | Before Tax |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Long Term Debt | 50.06\% | 4.58\% | 0.00\% | 2.29\% | 1.65\% | 2.29\% |
| Preferred Stock | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| Common Stock | 49.94\% | 9.60\% | 0.00\% | 4.79\% | 4.79\% | 6.66\% |
| Total | 100.00\% |  |  | 7.08\% | 6.44\% | 8.95\% |

FN1 Penalties/incentives are not applicable until Program Year 5; however, in order to ascertain that the model is flexible, this column is built into the model for future occurence.

## From June 10th Order order:

## Return on Equity

Staff recommends that the carrying costs for program investments use the capital structure established in each utility's most recent base rate case, incorporating both the cost of debt and the ROE. Staff recommends no basis point reduction on the ROE in order to recognize EE's importance compared to traditional utility investments.

From BRC Settlement in Docket No. ER18080925:
2 BPU DOCKET NO. ER18080925
OAL DOCKET NO. 14569-2018S

Agenda Date: 3/13/19
Agenda Item: 2D
does not reflect any particular ratemaking adjustment proposed by any Signatory Party for incorporation into the overall revenue requirement calculation.
2. The Signatory Parties agree that, for the purposes of resolving this proceeding, the Company shall have an overall rate of return of 7.08 percent, which is based on a capital structure consisting of 49.94 percent equity with a cost rate of 9.60 percent, and 50.06 percent long-term debt with a cost rate of 4.58 percent.

## ACE

NJ Tax Factor

## BRC Docket No. ER18080925

| Line No. | Description |  | Statutory Tax Rate |  |
| :---: | :---: | :---: | :---: | :---: |
| 1 | BPU Assessment |  | 0.257\% |  |
| 2 | NJ Sales and Use Tax (SUT) |  | 6.625\% |  |
| 3 | NJ Income Tax Rate |  | 9.000\% |  |
| 4 | Federal Income Tax Rate |  | 21.00\% |  |
| Line No. | Description | Computation | Total Tax Factor | Income Tax Factor |
| 5 | BPU Assessment | line 1 | 0.2570\% | 0.0000\% |
| 6 | NJ Sales and Use Tax (SUT) | line 2 | 6.6250\% | 0.0000\% |
| 7 | NJ Income Tax Rate | (100\% - (line $1+$ line 2)) $x$ line 3 | 8.3806\% | 9.0000\% |
| 8 | Federal Income Tax Factor | (100\% - (line $5+$ line $6+$ line 7) $\times$ line 4 | 17.7948\% | 19.1100\% |
| 9 | Composite Tax Factor | line $5+$ line $6+$ line $7+$ line 8 | 33.0575\% | 28.1100\% |
| 10 | Complement of Composite Tax Factor | 100\% - (line $4+$ line 5 + line 6) | 66.9425\% | 71.8900\% |
| 11 | Revenue Conversion Factor |  | 1.49382 | 1.39101 |

#  

Income Statement
Operating Revenues (Revenue Requirement)
Operating Expenses:
Operating and Maintenance
Regulatory Debits
Regulatory Debits
Depreciation and
Depreciation and Amortizatio
Operating Income
Other Income
Interest Expense
Income Before Income Taxes
Income Tax Expense
Net Income

| 274,775 | 291,127 | 293,896 | 272,587 | 275,481 | 286,466 | 298,956 | 300,115 | 303,005 | 299,299 | 303,492 | 314,930 | 3,514,129 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 176,190 | 176,190 | 176,190 | 176,190 | 176,190 | 176,190 | 176,190 | 176,190 | 176,190 | 176,190 | 176,190 | 176,190 | 2,114,285 |
| 58,681 | 62,524 | 62,188 | 10 | ,056 | 41,180 | 47,819 | 44,453 | 44,137 | 201 | 36,791 | 2,308 | 551,048 |
| 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 29,167 | 350,000 |
| 264,038 | 267,881 | 267,545 | 243,067 | 241,413 | 246,537 | 253,176 | 249,810 | 249,494 | 242,558 | 242,148 | 247,665 | 3,015,332 |
| 10,737 | 23,246 | 26,351 | 29,520 | 34,068 | 39,929 | 45,780 | 50,305 | 53,511 | 56,741 | 61,344 | 67,265 | 498,797 |
| - | - | - | - | - | - | - | - | - |  |  |  |  |
| 10,737 | 23,246 | 26,351 | 29,520 | 34,068 | 39,929 | 45,780 | 50,305 | 53,511 | 56,741 | 61,344 | 67,265 | 498,797 |
| $(3,018)$ | $(6,534)$ | $(7,407)$ | $(8,298)$ | $(9,577)$ | $(11,224)$ | $(12,869)$ | $(14,141)$ | $(15,042)$ | $(15,950)$ | $(17,244)$ | $(18,908)$ | (140,212) |
| 7,719 | 16,712 | 18,944 | 21,222 | 24,491 | 28,705 | 32,911 | 36,164 | 38,469 | 40,791 | 44,100 | 48,357 | 358,585 |

498,797
CCRF
Balance Sheet

| Assets |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Cash ${ }^{1}$ | (3,533,738) | (668,757) | $(491,929)$ | (657,848) | (998,684) | $(1,161,186)$ | $(990,433)$ | $(649,194)$ | (483,330) | (648,412) | (988,128) | (1,141,051) | (12,412,690) |
| Accounts Receivable ${ }^{1}$ | 206,081 | 12,264 | 2,077 | $(15,982)$ | 2,170 | 8,239 | 9,367 | 869 | 2,167 | $(2,779)$ | 3,145 | 8,578 | 236,198 |
| Income Tax Receivable | 460,162 | 204,739 | 158,770 | 211,376 | 303,361 | 348,982 | 302,311 | 210,050 | 163,961 | 212,665 | 307,787 | 350,911 | 3,235,073 |
| Regulatory Assets: |  |  |  |  |  |  |  |  |  |  |  |  |  |
| EE Program Costs | 1,676,241 | 771,429 | 607,558 | 770,226 | 1,095,804 | 1,263,223 | 1,103,831 | 772,249 | 607,977 | 774,300 | 1,112,285 | 1,271,213 | 11,826,337 |
| Less: Accumulated Amortization | $(58,681)$ | $(62,524)$ | (62,188) | $(37,710)$ | $(36,056)$ | $(41,180)$ | (47,819) | $(44,453)$ | $(44,137)$ | $(37,201)$ | (36,791) | $(42,308)$ | (551,048) |
| Net Regulatory Asset | 1,617,561 | 708,905 | 545,370 | 732,516 | 1,059,748 | 1,222,042 | 1,056,012 | 727,796 | 563,840 | 737,099 | 1,075,494 | 1,228,905 | 11,275,289 |
| Property, Plant \& Equipment (PP\&E) | 1,750,000 |  |  |  | - |  | - | - | - | - |  |  | 1,750,000 |
| Less: Accumulated Depreciation \& Amortization | (29,167) | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | (29,167) | $(29,167)$ | $(29,167)$ | $(29,167)$ | (29,167) | $(29,167)$ | (350,000) |
| Net Property, Plant \& Equipment | 1,720,833 | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(2,167)$ | $(29,167)$ | $(29,167)$ | 1,400,000 |
| Total Assets | 470,899 | 227,985 | 185,121 | 240,896 | 337,429 | 388,911 | 348,091 | 260,355 | 217,472 | 269,406 | 369,131 | 418,176 | 3,733,870 |
| Liabilities and Capitalization |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Liabilities |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Income Taxes Payable | 3,018 | 6,534 | 7,407 | 8,298 | 9,577 | 11,224 | 12,869 | 14,141 | 15,042 | 15,950 | 17,244 | 18,908 | 140,212 |
| Deferred Income Taxes | 460,162 | 204,739 | 158,770 | 211,376 | 303,361 | 348,982 | 302,311 | 210,050 | 163,961 | 212,665 | 307,787 | 350,911 | 3,235,073 |
| Total Liabilities | 463,180 | 211,273 | 166,177 | 219,674 | 312,937 | 360,206 | 315,180 | 224,191 | 179,003 | 228,615 | 325,031 | 369,819 | 3,375,285 |
| Capitalization | 7,719 | 16,712 | 18,944 | 21,222 | 24,491 | 28,705 | 32,911 | 36,164 | 38,469 | 40,791 | 44,100 | 48,357 | 358,585 |
| Total Liabilities \& Capitalization | 470,899 | 227,985 | 185,121 | 240,896 | 337,429 | 388,911 | 348,091 | 260,355 | 217,472 | 269,406 | 369,131 | 418,176 | 3,733,870 |

FN1 Accounts Receivable balances assume collection of $25 \%$ of the current month and $75 \%$ of the prior month.

## Return on Rate Base (Regulatory Asset and PP\&E)

Gross Plant
Accumulated Amortization \& Depreciation Net Plant

Beginning ADIT Balance
Ending ADIT Balance
Net Rate Base
Net Income
After-Tax Return on Rate Base
$\begin{array}{lllllllllll}3,426,241 & 4,197,671 & 4,805,229 & 5,575,455 & 6,671,259 & 7,934,482 & 9,038,313 & 9,810,562 & \text { \#\#\#\#\#\#\#\# \#\#\#\#\#\#\#\#112,305,124 } & 13,576,337\end{array}$


$\begin{array}{ccccccccccccc}- & (460,162) & (664,901) & (823,671) & (1,035,046) & (1,338,407) & (1,687,389) & (1,989,700) & (2,199,750) & (2,363,711) & (2,576,375) & (2,884,162) \\ (460,162) & (664,901) & (823,671) & (1,035,046) & (1,338,407) & (1,687,389) & (1,989,700) & (2,199,750) & (2,363,711) & (2,576,375) & (2,884,162) & (3,235,073)\end{array}$ | - | $(460,162)$ | $(664,901)$ | $(823,671)$ | $(1,035,046)$ | $(1,338,407)$ | $(1,687,389)$ | $(1,989,700)$ | $(2,199,750)$ | $(2,363,711)$ | $(2,576,375)$ |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $(2, ~(2,884,162)$ |  |  |  |  |  |  |  |  |  |  |
|  | $(664,901)$ | $(823,671)$ | $(1,035,046)$ | $(1,388,407)$ | $(1,687,389)$ | $(1,989,700)$ | $(2,199,750)$ | $(2,363,711)$ | $(2,576,375)$ | $(2,884,162)$ |$(3,235,073)$


| $1,439,116$ | $3,115,732$ | $3,531,949$ | $3,956,653$ | $4,566,250$ | $5,351,807$ | $6,136,021$ | $6,742,579$ | $7,172,225$ | $7,605,215$ | $8,222,119$ |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $9,015,803$ |  |  |  |  |  |  |  |  |  |  |


| 7,719 | 16,712 | 18,944 | 21,222 | 24,491 | 28,705 | 32,911 | 36,164 | 38,469 | 40,791 | 44,100 | 48,357 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ |

ACE
Energy Efficiency and Demand Response Surcharge
Pro-Forma Projected Income Statement and Balance Sheet
Cumulite

Balance Sheet

| Assets |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Cash ${ }^{1}$ | $(2,374,065)$ | $(1,401,207)$ | $(1,024,605)$ | $(1,418,657)$ | $(2,196,496)$ | $(2,542,629)$ | $(2,155,729)$ | $(1,416,362)$ | $(1,060,979)$ | $(1,435,055)$ | $(2,168,996)$ | $(2,501,297)$ | (21,696,078) | (34,108,768) |
| Accounts Receivable ${ }^{1}$ | 259,392 | 18,864 | 3,286 | $(70,634)$ | 1,899 | 25,253 | 32,899 | $(3,928)$ | 4,768 | $(16,967)$ | 6,142 | 27,052 | 288,027 | 524,224 |
| Income Tax Receivable | 629,535 | 426,407 | 326,841 | 460,397 | 661,566 | 755,999 | 648,757 | 454,129 | 353,851 | 467,213 | 669,976 | 761,245 | 6,615,914 | 9,850,987 |
| Regulatory Assets: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| EE Program Costs | 2,467,572 | 1,760,395 | 1,403,752 | 1,777,545 | 2,485,384 | 2,841,834 | 2,491,153 | 1,783,376 | 1,425,654 | 1,798,842 | 2,517,864 | 2,865,325 | 25,618,697 | 37,445,034 |
| Less: Accumulated Amorrization | (247,477) | (262,917) | (260,475) | (159,149) | (151,340) | (171,850) | $(202,676)$ | (187,279) | (186,291) | (156,198) | (153,902) | (176,678) | (2,316,232) | (2,867,280) |
| Net Regulatory Asset | 2,220,095 | 1,497,478 | 1,143,277 | 1,618,397 | 2,334,044 | 2,669,984 | 2,288,477 | 1,596,097 | 1,239,363 | 1,642,644 | 2,363,963 | 2,688,647 | 23,302,465 | 34,577,754 |
| Property, Plant \& Equipment (PP\&E) | - | - | - | - |  | - | - |  | - |  | - |  | 0 | 1,750,000 |
| Less: Accumulated Depreciation \& Amortization | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | (350,000) | $(700,000)$ |
| Net Property, Plant \& Equipment | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(2,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(350,000)$ | 1,050,000 |
| Total Assets | 705,791 | 512,375 | 419,632 | 560,336 | 771,846 | 879,440 | 785,238 | 600,769 | 507,836 | 628,669 | 841,918 | 946,479 | 8,160,327 | 11,894,197 |
| Liabilities and Capitalization |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Liabilities |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Income Taxes Payable | 21,436 | 24,166 | 26,084 | 28,093 | 31,000 | 34,699 | 38,365 | 41,221 | 43,285 | 45,385 | 48,333 | 52,069 | 434,134 | 574,346 |
| Deferred Income Taxes | 629,535 | 426,407 | 326,841 | 460,397 | 661,566 | 755,999 | 648,757 | 454,129 | 353,851 | 467,213 | 669,976 | 761,245 | 6,615,914 | 9,850,987 |
| Total Liabilities | 650,970 | 450,572 | 352,924 | 488,490 | 692,566 | 790,698 | 687,122 | 495,349 | 397,136 | 512,598 | 718,309 | 813,314 | 7,050,048 | 10,425,333 |
| Capitalization | 54,820 | 61,802 | 66,707 | 71,846 | 79,280 | 88,742 | 98,116 | 105,419 | 110,700 | 116,071 | 123,609 | 133,165 | 1,110,279 | 1,468,864 |
| Total Liabilities \& Capitalization | 705,791 | 512,375 | 419,632 | 560,336 | 771,846 | 879,440 | 785,238 | 600,769 | 507,836 | 628,669 | 841,918 | 946,479 | 8,160,327 | 11,894,197 |

FN1 Accounts Receivable balances assur

## Return on Rate Base (Regulatory Asset and PP\&E

Gross Plant
Accumulated Amortization \& Depreciation Net Plant

Beginning ADIT Balance
Ending ADIT Balance
Net Rate Base
Net Income
Atter-Tax Return on Rate Base

\section*{Program <br> <br> \section*{Year 2 <br> <br> \section*{Year 2 <br> <br> Total} <br> <br> Total}

$\begin{array}{lllllllllll}16,043,909 & 17,804,304 & 19,208,056 & 20,985,601 & 23,470,985 & 26,312,819 & 28,803,972 & 30,587,348 & 32,013,002 & 33,811,844 & 36,329,709 \\ 39,195,034\end{array}$ $\left.\begin{array}{lllllllllll}16,043,909 & 17,804,304 & 19,208,056 & 20,985,601 & 23,470,985 & 26,312,819 & 28,803,972 & 30,587,348 & 32,013,002 & 33,811,844 & 36,329,709\end{array}\right)$ | $(3,235,073)$ | $(3,864,608)$ | $(4,291,015)$ | $(4,617,856)$ | $(5,078,252)$ | $(5,739,818)$ | $(6,495,817)$ | $(7,144,574)$ | $(7,598,703)$ | $(7,952,554)$ | $(8,419,766)$ | $(9,089,742)$ |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $(3,547)$ |  |  |  |  |  |  |  |  |  |  |  | $\left.\begin{array}{llllllllll}(3,235,073 \\ (3,864,608) & (4,291,015) & (4,6177,856) & (5,078,252) & (5,739,818) & (6,495,817) & (7,144,574) & (7,598,703) & (7,952,554) & (8,419,766)\end{array}\right)(9,089,742) \quad(9,850,987)$ $\left.\begin{array}{lllllllllll}10,220,913 & 11,522,562 & 12,437,149 & 13,395,200 & 14,781,272 & 16,545,337 & 18,293,023 & 19,654,701 & 20,639,274 & 21,640,579 & 23,046,122\end{array} \quad 24,827,649\right)$

ACE
Energy Efficiency and Demand Response Surcharge
Pro-Forma Projected Income Statement and Balance Sheet

Income Statement
Operating Revenues (Revenue Requirement)
Operating Expenses:
Operating and Maintenance
Regulatory Debits
Depreciation and
Depreciation and Amortizatio
Total Operating Expenses
Operating Income
Other Income
Interest Expense
Income Before Income Taxes
Income Tax Expense
Net Income
1, t)

Balance Sheet

| Assets |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Cash ${ }^{1}$ | $(3,178,339)$ | $(1,437,544)$ | (944,397) | $(1,466,361)$ | (2,571,224) | $(3,025,076)$ | $(2,492,290)$ | (1,516,818) | $(1,068,592)$ | (1,550,213) | $(2,523,008)$ | $(2,960,884)$ | (24,734,747) | $(58,843,515)$ |
| Accounts Receivable ${ }^{1}$ | 334,886 | 36,141 | $(2,086)$ | (162,705) | $(7,935)$ | 50,615 | 67,427 | (17,751) | (943) | $(36,711)$ | 2,958 | 51,667 | 315,56 | 839,788 |
| Income Tax Receivable | 869,300 | 467,422 | 341,612 | 535,737 | 806,305 | 921,957 | 771,906 | 525,020 | 396,669 | 544,529 | 810,362 | 924,308 | 7,915,125 | 17,766,112 |
| Regulatory Assets: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| EE Program Costs | 3,631,402 | 2,237,539 | 1,779,839 | 2,245,482 | 3,184,995 | 3,647,784 | 3,188,089 | 2,274,126 | 1,807,835 | 2,276,276 | 3,213,346 | 3,671,403 | 33,158,116 | 70,603,150 |
| Less: Accumulated Amorrization | (558,355) | (594,153) | (584,016) | (359,068) | $(336,048)$ | (387,410) | (461,515) | (425,836) | (416,148) | (358,583) | (349,965) | (402,667) | $(5,233,764)$ | (8,101,044) |
| Net Regulatory Asset | 3,073,047 | 1,643,386 | 1,195,823 | 1,886,414 | 2,848,947 | 3,260,374 | 2,726,574 | 1,848,290 | 1,391,686 | 1,917,693 | 2,863,381 | 3,268,736 | 27,924,353 | 62,502,106 |
| Property, Plant \& Equipment (PP\&E) | - | - | - | - | - |  |  | - |  | - |  | - | 0 | 1,750,000 |
| Less: Accumulated Depreciation \& Amortization | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | (350,000) | (1,050,000) |
| Net Property, Plant \& Equipment | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | (29,167) | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(29,167)$ | $(350,000)$ | 700,000 |
| Total Assets | 1,069,727 | 680,239 | 561,785 | 763,918 | 1,046,926 | 1,178,704 | 1,044,450 | 809,575 | 689,654 | 846,131 | 1,124,527 | 1,254,660 | 11,070,294 | 22,964,491 |
| Liabilities and Capitalization |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Liabilities |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Income Taxes Payable | 5,340 | 5,82 | 61,891 | 64,142 | 67,639 | 72,172 | 76,612 | 79,988 | 82,38 | 84,780 | 88,312 | 92,862 | 886,918 | 1,461,264 |
| Deferred Income Taxes | 869,300 | 467,422 | 341,612 | 535,737 | 806,305 | 921,957 | 771,906 | 525,020 | 396,669 | 544,529 | 810,362 | 924,308 | 7,915,125 | 17,766,112 |
| Total Liabilities | 925,640 | 527,245 | 403,502 | 599,879 | 873,943 | 994,128 | 848,518 | 605,008 | 479,027 | 629,309 | 898,674 | 1,017,170 | 8,802,043 | 19,227,376 |
| Capitalization | 144,087 | 152,994 | 158,282 | 164,039 | 172,982 | 184,575 | 195,932 | 204,567 | 210,627 | 216,822 | 225,853 | 237,490 | 2,268,251 | 3,737,115 |
| Total Liabilities \& Capitalization | 1,069,727 | 680,239 | 561,785 | 763,918 | 1,046,926 | 1,178,704 | 1,044,450 | 809,575 | 689,654 | 846,131 | 1,124,527 | 1,254,660 | 11,070,294 | 22,964,491 |
| FN1 Accounts Receivable balances assun |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

## Return on Rate Base (Regulatory Asset and PP\&E <br> Gross Plant Accumulated Amortization \& Depreciation Net Plant

Beginning ADIT Balance
Ending ADIT Balance
Net Rate Base
Net Income
Atter-Tax Return on Rate Base
$\begin{array}{lllllllllll}42,826,436 & 45,063,975 & 46,843,814 & 49,089,296 & 52,274,291 & 55,922,075 & 59,110,164 & 61,384,290 & 63,192,125 & 65,468,402 & 68,681,747\end{array} \quad 72,353,150$

| $(42,826,436$ | $45,063,975$ | $46,843,814$ | $49,089,296$ | $52,274,291$ | $55,922,075$ | $59,110,164$ | $61,384,290$ | $63,192,125$ | $65,468,402$ | $68,681,747$ |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $(4,154,801)$ | $(4,778,121)$ | $(5,391,304)$ | $(5,779,539)$ | $(6,144,754)$ | $(6,561,330)$ | $(7,052,011)$ | $(7,507,014)$ | $(7,952,329)$ | $(8,340,079)$ | $(8,719,211)$ |
| $(9,151,044)$ |  |  |  |  |  |  |  |  |  |  | $\begin{array}{lllllllllll}(4,154,801) & (4,778,121) & (5,391,304) & (5,779,539) & (6,144,754) & (6,561,330) & (7,052,011) & (7,507,014) & (7,952,329) & (8,340,079) & (8,719,211)\end{array}(9,151,044)$

$\begin{array}{lllllllllll}(9,850,987) & (10,720,287) & (11,187,709) & (11,529,321) & (12,065,057) & (12,871,362) & (13,793,319) & (14,565,225) & (15,090,245) & (15,486,914) & (16,031,442)\end{array}(16,841,804)$ $\begin{array}{llll}(10,720,287)(11,187,709)(11,529,321) & (12,065,057)(12,871,362)(13,793,319)(14,565,225) & (15,090,245)(15,486,914)(16,031,442)(16,841,804)(17,766,112)\end{array}$
$\begin{array}{lllllllllll}26,864,057 & 28,524,746 & 29,510,667 & 30,583,945 & 32,251,437 & 34,412,801 & 36,530,177 & 38,139,980 & 39,269,957 & 40,424,881 & 42,108,806\end{array} 444,278,363$

| 144,087 | 152,994 | 158,282 | 164,039 | 172,982 | 184,575 | 195,932 | 204,567 | 210,627 | 216,822 | 225,853 | 237,490 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |


| $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $0.54 \%$ | $6.44 \%$ |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |

## Schedule (MTN)-2

## YEAR 1 BILL IMPACTS

| Present Rates vs. Proposed Rates |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Monthly | Present Delivery |  | Present Supply+T |  | Present Total |  | New Delivery |  | New <br> Supply+T |  | New <br> Total |  | Difference |  |  |  | Total |  | (\%) |
| Usage |  |  |  |  |  |  |  | $y+T$ |  |  |  | ence |  |
| (kWh) |  | (\$) |  |  |  | (\$) |  |  |  | (\$) |  |  |  | (\$) |  | \$) |  | (\$) |  |  |  |  |  |  |  |
| 0 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | - | \$ | - | \$ | - | 0.00\% |
| 25 | \$ | 7.87 | \$ | 2.60 | \$ | 10.47 | \$ | 7.87 | \$ | 2.61 | \$ | 10.48 | \$ | - | \$ | 0.01 | \$ | 0.01 | 0.10\% |
| 50 | \$ | 9.97 | \$ | 5.20 | \$ | 15.17 | \$ | 9.97 | \$ | 5.22 | \$ | 15.19 | \$ | - | \$ | 0.02 | \$ | 0.02 | 0.13\% |
| 75 | \$ | 12.07 | \$ | 7.79 | \$ | 19.86 | \$ | 12.07 | \$ | 7.83 | \$ | 19.90 | \$ | - | \$ | 0.04 | \$ | 0.04 | 0.20\% |
| 100 | \$ | 14.17 | \$ | 10.39 | \$ | 24.56 | \$ | 14.17 | \$ | 10.44 | \$ | 24.61 | \$ | - | \$ | 0.05 | \$ | 0.05 | 0.20\% |
| 150 | \$ | 18.37 | \$ | 15.59 | \$ | 33.96 | \$ | 18.37 | \$ | 15.65 | \$ | 34.02 | \$ | - | \$ | 0.06 | \$ | 0.06 | 0.18\% |
| 200 | \$ | 22.57 | \$ | 20.78 | \$ | 43.35 | \$ | 22.57 | \$ | 20.87 | \$ | 43.44 | \$ | - | \$ | 0.09 | \$ | 0.09 | 0.21\% |
| 250 | \$ | 26.77 | \$ | 25.98 | \$ | 52.75 | \$ | 26.77 | \$ | 26.09 | \$ | 52.86 | \$ | - | \$ | 0.11 | \$ | 0.11 | 0.21\% |
| 300 | \$ | 30.97 | \$ | 31.17 | \$ | 62.14 | \$ | 30.97 | \$ | 31.31 | \$ | 62.28 | \$ | - | \$ | 0.14 | \$ | 0.14 | 0.23\% |
| 350 | \$ | 35.17 | \$ | 36.37 | \$ | 71.54 | \$ | 35.17 | \$ | 36.53 | \$ | 71.70 | \$ | - | \$ | 0.16 | \$ | 0.16 | 0.22\% |
| 400 | \$ | 39.37 | \$ | 41.57 | \$ | 80.94 | \$ | 39.37 | \$ | 41.74 | \$ | 81.11 | \$ | - | \$ | 0.17 | \$ | 0.17 | 0.21\% |
| 450 | \$ | 43.57 | \$ | 46.76 | \$ | 90.33 | \$ | 43.57 | \$ | 46.96 | \$ | 90.53 | \$ | - | \$ | 0.20 | \$ | 0.20 | 0.22\% |
| 500 | \$ | 47.77 | \$ | 51.96 | \$ | 99.73 | \$ | 47.77 | \$ | 52.18 | \$ | 99.95 | \$ | - | \$ | 0.22 | \$ | 0.22 | 0.22\% |
| 600 | \$ | 56.17 | \$ | 62.35 | \$ | 118.52 | \$ | 56.17 | \$ | 62.62 | \$ | 118.79 | \$ | - | \$ | 0.27 | \$ | 0.27 | 0.23\% |
| 679 | \$ | 62.81 | \$ | 70.56 | \$ | 133.37 | \$ | 62.81 | \$ | 70.86 | \$ | 133.67 | \$ | - | \$ | 0.30 | \$ | 0.30 | 0.22\% |
| 700 | \$ | 64.57 | \$ | 72.74 | \$ | 137.31 | \$ | 64.57 | \$ | 73.05 | \$ | 137.62 | \$ | - | \$ | 0.31 | \$ | 0.31 | 0.23\% |
| 750 | \$ | 68.77 | \$ | 77.94 | \$ | 146.71 | \$ | 68.77 | \$ | 78.27 | \$ | 147.04 | \$ | - | \$ | 0.33 | \$ | 0.33 | 0.22\% |
| 800 | \$ | 72.97 | \$ | 83.13 | \$ | 156.10 | \$ | 72.97 | \$ | 83.49 | \$ | 156.46 | \$ | - | \$ | 0.36 | \$ | 0.36 | 0.23\% |
| 900 | \$ | 81.38 | \$ | 93.52 | \$ | 174.90 | \$ | 81.38 | \$ | 93.92 | \$ | 175.30 | \$ | - | \$ | 0.40 | \$ | 0.40 | 0.23\% |
| 1000 | \$ | 89.78 | \$ | 103.92 | \$ | 193.70 | \$ | 89.78 | \$ | 104.36 | \$ | 194.14 | \$ | - | \$ | 0.44 | \$ | 0.44 | 0.23\% |
| 1200 | \$ | 106.58 | \$ | 124.70 | \$ | 231.28 | \$ | 106.58 | \$ | 125.23 | \$ | 231.81 | \$ | - | \$ | 0.53 | \$ | 0.53 | 0.23\% |
| 1500 | \$ | 131.78 | \$ | 155.87 | \$ | 287.65 | \$ | 131.78 | \$ | 156.54 | \$ | 288.32 | \$ | - | \$ | 0.67 | \$ | 0.67 | 0.23\% |
| 2000 | \$ | 173.78 | \$ | 207.83 | \$ | 381.61 | \$ | 173.78 | \$ | 208.72 | \$ | 382.50 | \$ | - | \$ | 0.89 | \$ | 0.89 | 0.23\% |
| 2500 | \$ | 215.79 | \$ | 259.79 | \$ | 475.58 | \$ | 215.79 | \$ | 260.90 | \$ | 476.69 | \$ | - | \$ | 1.11 | \$ | 1.11 | 0.23\% |
| 3000 | \$ | 257.79 | \$ | 311.75 | \$ | 569.54 | \$ | 257.79 | \$ | 313.08 | \$ | 570.87 | \$ | - | \$ | 1.33 | \$ | 1.33 | 0.23\% |
| 3500 | \$ | 299.79 | \$ | 363.70 | \$ | 663.49 | \$ | 299.79 | \$ | 365.26 | \$ | 665.05 | \$ | - | \$ | 1.56 | \$ | 1.56 | 0.24\% |
| 4000 | \$ | 341.79 | \$ | 415.66 | \$ | 757.45 | \$ | 341.79 | \$ | 417.44 | \$ | 759.23 | \$ | - | \$ | 1.78 | \$ | 1.78 | 0.23\% |

4 SUMMER MONTHS (June Through September)

## Present Rates <br> vs.

Proposed Rates

| Monthly Usage (kWh) | Present Delivery |  | Present Supply+T |  | Present Total |  | New Delivery |  | New Supply+T |  | New <br> Total |  | Difference |  |  |  | Total |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Delivery | Supply+T |  | Difference |  |  |  |  |  |  |
|  |  | (\$) |  |  |  | \$) |  |  |  | (\$) |  | \$) |  | \$) |  | \$) |  |  |  |  |  |  | (\%) |
| 0 | \$ | 5.77 | \$ | - |  |  | \$ | 5.77 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | - | \$ | - | \$ | - | 0.00\% |
| 25 | \$ | 8.01 | \$ | 2.33 | \$ | 10.34 | \$ | 8.01 | \$ | 2.34 | \$ | 10.35 | \$ | - | \$ | 0.01 | \$ | 0.01 | 0.10\% |
| 50 | \$ | 10.25 | \$ | 4.65 | \$ | 14.90 | \$ | 10.25 | \$ | 4.67 | \$ | 14.92 | \$ | - | \$ | 0.02 | \$ | 0.02 | 0.13\% |
| 75 | \$ | 12.49 | \$ | 6.98 | \$ | 19.47 | \$ | 12.49 | \$ | 7.01 | \$ | 19.50 | \$ | - | \$ | 0.03 | \$ | 0.03 | 0.15\% |
| 100 | \$ | 14.73 | \$ | 9.30 | \$ | 24.03 | \$ | 14.73 | \$ | 9.35 | \$ | 24.08 | \$ | - | \$ | 0.05 | \$ | 0.05 | 0.21\% |
| 150 | \$ | 19.20 | \$ | 13.95 | \$ | 33.15 | \$ | 19.20 | \$ | 14.02 | \$ | 33.22 | \$ | - | \$ | 0.07 | \$ | 0.07 | 0.21\% |
| 200 | \$ | 23.68 | \$ | 18.60 | \$ | 42.28 | \$ | 23.68 | \$ | 18.69 | \$ | 42.37 | \$ | - | \$ | 0.09 | \$ | 0.09 | 0.21\% |
| 250 | \$ | 28.16 | \$ | 23.25 | \$ | 51.41 | \$ | 28.16 | \$ | 23.37 | \$ | 51.53 | \$ | - | \$ | 0.12 | \$ | 0.12 | 0.23\% |
| 300 | \$ | 32.64 | \$ | 27.91 | \$ | 60.55 | \$ | 32.64 | \$ | 28.04 | \$ | 60.68 | \$ | - | \$ | 0.13 | \$ | 0.13 | 0.21\% |
| 350 | \$ | 37.12 | \$ | 32.56 | \$ | 69.68 | \$ | 37.12 | \$ | 32.71 | \$ | 69.83 | \$ | - | \$ | 0.15 | \$ | 0.15 | 0.22\% |
| 400 | \$ | 41.59 | \$ | 37.21 | \$ | 78.80 | \$ | 41.59 | \$ | 37.39 | \$ | 78.98 | \$ | - | \$ | 0.18 | \$ | 0.18 | 0.23\% |
| 450 | \$ | 46.07 | \$ | 41.86 | \$ | 87.93 | \$ | 46.07 | \$ | 42.06 | \$ | 88.13 | \$ | - | \$ | 0.20 | \$ | 0.20 | 0.23\% |
| 500 | \$ | 50.55 | \$ | 46.51 | \$ | 97.06 | \$ | 50.55 | \$ | 46.73 | \$ | 97.28 | \$ | - | \$ | 0.22 | \$ | 0.22 | 0.23\% |
| 600 | \$ | 59.50 | \$ | 55.81 | \$ | 115.31 | \$ | 59.50 | \$ | 56.08 | \$ | 115.58 | \$ | - | \$ | 0.27 | \$ | 0.27 | 0.23\% |
| 679 | \$ | 66.58 | \$ | 63.16 | \$ | 129.74 | \$ | 66.58 | \$ | 63.46 | \$ | 130.04 | \$ | - | \$ | 0.30 | \$ | 0.30 | 0.23\% |
| 700 | \$ | 68.46 | \$ | 65.11 | \$ | 133.57 | \$ | 68.46 | \$ | 65.42 | \$ | 133.88 | \$ | - | \$ | 0.31 | \$ | 0.31 | 0.23\% |
| 750 | \$ | 72.94 | \$ | 69.76 | \$ | 142.70 | \$ | 72.94 | \$ | 70.10 | \$ | 143.04 | \$ | - | \$ | 0.34 | \$ | 0.34 | 0.24\% |
| 800 | \$ | 77.95 | \$ | 74.92 | \$ | 152.87 | \$ | 77.95 | \$ | 75.27 | \$ | 153.22 | \$ | - | \$ | 0.35 | \$ | 0.35 | 0.23\% |
| 900 | \$ | 87.98 | \$ | 85.23 | \$ | 173.21 | \$ | 87.98 | \$ | 85.63 | \$ | 173.61 | \$ | - | \$ | 0.40 | \$ | 0.40 | 0.23\% |
| 1000 | \$ | 98.01 | \$ | 95.53 | \$ | 193.54 | \$ | 98.01 | \$ | 95.98 | \$ | 193.99 | \$ | - | \$ | 0.45 | \$ | 0.45 | 0.23\% |
| 1200 | \$ | 118.07 | \$ | 116.15 | \$ | 234.22 | \$ | 118.07 | \$ | 116.68 | \$ | 234.75 | \$ | - | \$ | 0.53 | \$ | 0.53 | 0.23\% |
| 1500 | \$ | 148.17 | \$ | 147.07 | \$ | 295.24 | \$ | 148.17 | \$ | 147.74 | \$ | 295.91 | \$ | - | \$ | 0.67 | \$ | 0.67 | 0.23\% |
| 2000 | \$ | 198.32 | \$ | 198.61 | \$ | 396.93 | \$ | 198.32 | \$ | 199.50 | \$ | 397.82 | \$ | - | \$ | 0.89 | \$ | 0.89 | 0.22\% |
| 2500 | \$ | 248.47 | \$ | 250.15 | \$ | 498.62 | \$ | 248.47 | \$ | 251.26 | \$ | 499.73 | \$ | - | \$ | 1.11 | \$ | 1.11 | 0.22\% |
| 3000 | \$ | 298.62 | \$ | 301.69 | \$ | 600.31 | \$ | 298.62 | \$ | 303.02 | \$ | 601.64 | \$ | - | \$ | 1.33 | \$ | 1.33 | 0.22\% |
| 3500 | \$ | 348.77 | \$ | 353.23 | \$ | 702.00 | \$ | 348.77 | \$ | 354.79 | \$ | 703.56 | \$ | - | \$ | 1.56 | \$ | 1.56 | 0.22\% |
| 4000 | \$ | 398.92 | \$ | 404.77 | \$ | 803.69 | \$ | 398.92 | \$ | 406.55 | \$ | 805.47 | \$ | - | \$ | 1.78 | \$ | 1.78 | 0.22\% |

Annual Average
Present Rates
vs.
Proposed Rates

| Monthly Usage (kWh) | Present Delivery |  | Present Supply+T |  | Present Total |  | New Delivery |  | New Supply+T |  | New <br> Total |  | Difference |  |  |  | Total |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Delivery | Supply+T |  | Difference |  |  |  |  |  |  |
|  |  | (\$) |  |  |  | \$) |  |  |  | (\$) |  | \$) |  | \$) |  | \$) |  |  |  |  |  |  |  |
| 0 | \$ | 5.77 | \$ | - |  |  | \$ | 5.77 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | - | \$ | - | \$ | - | 0.00\% |
| 25 | \$ | 7.92 | \$ | 2.51 | \$ | 10.43 | \$ | 7.92 | \$ | 2.52 | \$ | 10.44 | \$ | - | \$ | 0.01 | \$ | 0.01 | 0.10\% |
| 50 | \$ | 10.06 | \$ | 5.02 | \$ | 15.08 | \$ | 10.06 | \$ | 5.04 | \$ | 15.10 | \$ | - | \$ | 0.02 | \$ | 0.02 | 0.13\% |
| 75 | \$ | 12.21 | \$ | 7.52 | \$ | 19.73 | \$ | 12.21 | \$ | 7.56 | \$ | 19.77 | \$ | - | \$ | 0.04 | \$ | 0.04 | 0.20\% |
| 100 | \$ | 14.36 | \$ | 10.03 | \$ | 24.39 | \$ | 14.36 | \$ | 10.08 | \$ | 24.44 | \$ | - | \$ | 0.05 | \$ | 0.05 | 0.21\% |
| 150 | \$ | 18.65 | \$ | 15.04 | \$ | 33.69 | \$ | 18.65 | \$ | 15.11 | \$ | 33.76 | \$ | - | \$ | 0.07 | \$ | 0.07 | 0.21\% |
| 200 | \$ | 22.94 | \$ | 20.05 | \$ | 42.99 | \$ | 22.94 | \$ | 20.14 | \$ | 43.08 | \$ | - | \$ | 0.09 | \$ | 0.09 | 0.21\% |
| 250 | \$ | 27.23 | \$ | 25.07 | \$ | 52.30 | \$ | 27.23 | \$ | 25.18 | \$ | 52.41 | \$ | - | \$ | 0.11 | \$ | 0.11 | 0.21\% |
| 300 | \$ | 31.53 | \$ | 30.08 | \$ | 61.61 | \$ | 31.53 | \$ | 30.22 | \$ | 61.75 | \$ | - | \$ | 0.14 | \$ | 0.14 | 0.23\% |
| 350 | \$ | 35.82 | \$ | 35.10 | \$ | 70.92 | \$ | 35.82 | \$ | 35.26 | \$ | 71.08 | \$ | - | \$ | 0.16 | \$ | 0.16 | 0.23\% |
| 400 | \$ | 40.11 | \$ | 40.12 | \$ | 80.23 | \$ | 40.11 | \$ | 40.29 | \$ | 80.40 | \$ | - | \$ | 0.17 | \$ | 0.17 | 0.21\% |
| 450 | \$ | 44.40 | \$ | 45.13 | \$ | 89.53 | \$ | 44.40 | \$ | 45.33 | \$ | 89.73 | \$ | - | \$ | 0.20 | \$ | 0.20 | 0.22\% |
| 500 | \$ | 48.70 | \$ | 50.14 | \$ | 98.84 | \$ | 48.70 | \$ | 50.36 | \$ | 99.06 | \$ | - | \$ | 0.22 | \$ | 0.22 | 0.22\% |
| 600 | \$ | 57.28 | \$ | 60.17 | \$ | 117.45 | \$ | 57.28 | \$ | 60.44 | \$ | 117.72 | \$ | - | \$ | 0.27 | \$ | 0.27 | 0.23\% |
| 679 | \$ | 64.07 | \$ | 68.09 | \$ | 132.16 | \$ | 64.07 | \$ | 68.39 | \$ | 132.46 | \$ | - | \$ | 0.30 | \$ | 0.30 | 0.23\% |
| 700 | \$ | 65.87 | \$ | 70.20 | \$ | 136.07 | \$ | 65.87 | \$ | 70.51 | \$ | 136.38 | \$ | - | \$ | 0.31 | \$ | 0.31 | 0.23\% |
| 750 | \$ | 70.16 | \$ | 75.21 | \$ | 145.37 | \$ | 70.16 | \$ | 75.55 | \$ | 145.71 | \$ | - | \$ | 0.34 | \$ | 0.34 | 0.23\% |
| 800 | \$ | 74.63 | \$ | 80.39 | \$ | 155.02 | \$ | 74.63 | \$ | 80.75 | \$ | 155.38 | \$ | - | \$ | 0.36 | \$ | 0.36 | 0.23\% |
| 900 | \$ | 83.58 | \$ | 90.76 | \$ | 174.34 | \$ | 83.58 | \$ | 91.16 | \$ | 174.74 | \$ | - | \$ | 0.40 | \$ | 0.40 | 0.23\% |
| 1000 | \$ | 92.52 | \$ | 101.12 | \$ | 193.64 | \$ | 92.52 | \$ | 101.57 | \$ | 194.09 | \$ | - | \$ | 0.45 | \$ | 0.45 | 0.23\% |
| 1200 | \$ | 110.41 | \$ | 121.85 | \$ | 232.26 | \$ | 110.41 | \$ | 122.38 | \$ | 232.79 | $\$$ | - | \$ | 0.53 | \$ | 0.53 | 0.23\% |
| 1500 | \$ | 137.24 | \$ | 152.94 | \$ | 290.18 | \$ | 137.24 | \$ | 153.61 | \$ | 290.85 | \$ | - | \$ | 0.67 | \$ | 0.67 | 0.23\% |
| 2000 | \$ | 181.96 | \$ | 204.76 | \$ | 386.72 | \$ | 181.96 | \$ | 205.65 | \$ | 387.61 | \$ | - | \$ | 0.89 | \$ | 0.89 | 0.23\% |
| 2500 | \$ | 226.68 | \$ | 256.58 | \$ | 483.26 | \$ | 226.68 | \$ | 257.69 | \$ | 484.37 | \$ | - | \$ | 1.11 | \$ | 1.11 | 0.23\% |
| 3000 | \$ | 271.40 | \$ | 308.40 | \$ | 579.80 | \$ | 271.40 | \$ | 309.73 | \$ | 581.13 | \$ | - | \$ | 1.33 | \$ | 1.33 | 0.23\% |
| 3500 | \$ | 316.12 | \$ | 360.21 | \$ | 676.33 | \$ | 316.12 | \$ | 361.77 | \$ | 677.89 | \$ | - | \$ | 1.56 | \$ | 1.56 | 0.23\% |
| 4000 | \$ | 360.83 | \$ | 412.03 | \$ | 772.86 | \$ | 360.83 | \$ | 413.81 | \$ | 774.64 | \$ | - | \$ | 1.78 | \$ | 1.78 | 0.23\% |



## ATLANTIC CITY ELECTRIC COMPANY

MONTHLY GENERAL SERVICE SECONDARY ("MGS Secondary")
4 SUMMER MONTHS (June Through September)


Present Rates
vs.


ATLANTIC CITY ELECTRIC COMPANY
$\frac{\text { MONTHLY GENERAL SERVICE PRIMARY ("MGS Primary") }}{8 \text { WINTER MONTHS (October Through May) }}$
8 WINTER MONTHS (October Through May)


ATLANTIC CITY ELECTRIC COMPANY
MONTHLY GENERAL SERVICE PRIMARY ("MGS Primary")
4 SUMMER MONTHS (June Through September)

## Present Rates <br> Present Rate

| Demand | $\begin{aligned} & \text { Load } \\ & \text { Factor } \\ & \hline \end{aligned}$ | Energy | Dist kW | Trans kW | Present Distribution |  | PresentBGS and Other Charges |  | vs. <br> Proposed Rates |  |  |  | BGS and Other Charges |  | New Total |  | Difference Distribution |  | Difference BGS and Other Charges |  | Total Difference |  | Total Difference |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | Present Total | New Distribution |  |  |  |  |  |  |  |  |  |  |  |  |
| (kW) | (\%) | (kWh) |  |  |  | (\$) |  |  |  |  |  | (\$) |  | (\$) |  |  |  | (\$) |  |  |  |  |  | (\$) | (\%) |
| 5 | 20 | 730 | 5.00 | 2 | \$ | 55.03 | \$ | 75.88 | \$ | 130.92 | \$ | 55.03 | \$ | 76.21 | \$ | 131.24 | \$ | - | \$ | 0.32 | \$ | 0.32 | 0.2\% |
| 5 | 30 | 1,095 | 5.00 | 2 | \$ | 71.25 | \$ | 111.31 | \$ | 182.56 | \$ | 71.25 | \$ | 111.80 | \$ | 183.05 | \$ | - | \$ | 0.49 | \$ | 0.49 | 0.3\% |
| 5 | 40 | 1,460 | 5.00 | 2 | \$ | 87.46 | \$ | 146.75 | \$ | 234.21 | \$ | 87.46 | \$ | 147.39 | \$ | 234.86 | \$ | - | \$ | 0.65 | \$ | 0.65 | 0.3\% |
| 5 | 50 | 1,825 | 5.00 | 2 | \$ | 103.68 | \$ | 182.18 | \$ | 285.86 | \$ | 103.68 | \$ | 182.99 | \$ | 286.67 | \$ | - | \$ | 0.81 | \$ | 0.81 | 0.3\% |
| 5 | 60 | 2,190 | 5.00 | 2 | \$ | 119.90 | \$ | 217.61 | \$ | 337.51 | \$ | 119.90 | \$ | 218.58 | \$ | 338.48 | \$ | - | \$ | 0.97 | \$ | 0.97 | 0.3\% |
| 5 | 70 | 2,555 | 5.00 | 2 | \$ | 136.11 | \$ | 253.04 | \$ | 389.16 | \$ | 136.11 | \$ | 254.18 | \$ | 390.29 | \$ | - | \$ | 1.13 | \$ | 1.13 | 0.3\% |
| 5 | 80 | 2,920 | 5.00 | 2 | \$ | 152.33 | \$ | 288.47 | \$ | 440.80 | \$ | 152.33 | \$ | 289.77 | \$ | 442.10 | \$ | - | \$ | 1.30 | \$ | 1.30 | 0.3\% |
| 10 | 20 | 1,460 | 10.00 | 7 | \$ | 95.36 | \$ | 159.30 | \$ | 254.66 | \$ | 95.36 | \$ | 159.94 | \$ | 255.31 | \$ | - | \$ | 0.65 | \$ | 0.65 | 0.3\% |
| 10 | 30 | 2,190 | 10.00 | 7 | \$ | 127.80 | \$ | 230.16 | \$ | 357.96 | \$ | 127.80 | \$ | 231.13 | \$ | 358.93 | \$ | - | \$ | 0.97 | \$ | 0.97 | 0.3\% |
| 10 | 40 | 2,920 | 10.00 | 7 | \$ | 160.23 | \$ | 301.02 | \$ | 461.25 | \$ | 160.23 | \$ | 302.32 | \$ | 462.55 | \$ | - | \$ | 1.30 | \$ | 1.30 | 0.3\% |
| 10 | 50 | 3,650 | 10.00 | 7 | \$ | 192.66 | \$ | 371.89 | \$ | 564.55 | \$ | 192.66 | \$ | 373.51 | \$ | 566.17 | \$ | - | \$ | 1.62 | \$ | 1.62 | 0.3\% |
| 10 | 60 | 4,380 | 10.00 | 7 | \$ | 225.09 | \$ | 442.75 | \$ | 667.84 | \$ | 225.09 | \$ | 444.69 | \$ | 669.79 | \$ | - | \$ | 1.94 | \$ | 1.94 | 0.3\% |
| 10 | 70 | 5,110 | 10.00 | 7 | \$ | 257.53 | \$ | 513.61 | \$ | 771.14 | \$ | 257.53 | \$ | 515.88 | \$ | 773.41 | \$ | - | \$ | 2.27 | \$ | 2.27 | 0.3\% |
| 10 | 80 | 5,840 | 10.00 | 7 | \$ | 289.96 | \$ | 584.48 | \$ | 874.44 | \$ | 289.96 | \$ | 587.07 | \$ | 877.03 | \$ | - | \$ | 2.59 | \$ | 2.59 | 0.3\% |
| 20 | 20 | 2,920 | 20.00 | 17 | \$ | 176.03 | \$ | 326.12 | \$ | 502.15 | \$ | 176.03 | \$ | 327.42 | \$ | 503.45 | \$ | - | \$ | 1.30 | \$ | 1.30 | 0.3\% |
| 20 | 30 | 4,380 | 20.00 | 17 | \$ | 240.89 | \$ | 467.85 | \$ | 708.74 | \$ | 240.89 | \$ | 469.79 | \$ | 710.69 | \$ | - | \$ | 1.94 | \$ | 1.94 | 0.3\% |
| 20 | 40 | 5,840 | 20.00 | 17 | \$ | 305.76 | \$ | 609.58 | \$ | 915.34 | \$ | 305.76 | \$ | 612.17 | \$ | 917.93 | \$ | - | \$ | 2.59 | \$ | 2.59 | 0.3\% |
| 20 | 50 | 7,300 | 20.00 | 17 | \$ | 370.62 | \$ | 751.30 | \$ | 1,121.93 | \$ | 370.62 | \$ | 754.54 | \$ | 1,125.17 | \$ | - | \$ | 3.24 | \$ | 3.24 | 0.3\% |
| 20 | 60 | 8,760 | 20.00 | 17 | \$ | 435.49 | \$ | 893.03 | \$ | 1,328.52 | \$ | 435.49 | \$ | 896.92 | \$ | 1,332.41 | \$ | - | \$ | 3.89 | \$ | 3.89 | 0.3\% |
| 20 | 70 | 10,220 | 20.00 | 17 | \$ | 500.35 | \$ | 1,034.76 | \$ | 1,535.11 | \$ | 500.35 | \$ | 1,039.29 | \$ | 1,539.65 | \$ | - | \$ | 4.54 | \$ | 4.54 | 0.3\% |
| 20 | 80 | 11,680 | 20.00 | 17 | \$ | 565.22 | \$ | 1,176.48 | \$ | 1,741.70 | \$ | 565.22 | \$ | 1,181.67 | \$ | 1,746.89 | \$ | - | \$ | 5.19 | \$ | 5.19 | 0.3\% |
| 30 | 20 | 4,380 | 30.00 | 27 | \$ | 256.69 | \$ | 492.95 | \$ | 749.64 | \$ | 256.69 | \$ | 494.89 | \$ | 751.59 | \$ | - | \$ | 1.94 | \$ | 1.94 | 0.3\% |
| 30 | 30 | 6,570 | 30.00 | 27 | \$ | 353.99 | \$ | 705.54 | \$ | 1,059.53 | \$ | 353.99 | \$ | 708.46 | \$ | 1,062.45 | \$ | - | \$ | 2.92 | \$ | 2.92 | 0.3\% |
| 30 | 40 | 8,760 | 30.00 | 27 | \$ | 451.29 | \$ | 918.13 | \$ | 1,369.42 | \$ | 451.29 | \$ | 922.02 | \$ | 1,373.31 | \$ | - | \$ | 3.89 | \$ | 3.89 | 0.3\% |
| 30 | 50 | 10,950 | 30.00 | 27 | \$ | 548.59 | \$ | 1,130.72 | \$ | 1,679.31 | \$ | 548.59 | \$ | 1,135.58 | \$ | 1,684.17 | \$ | - | \$ | 4.86 | \$ | 4.86 | 0.3\% |
| 30 | 60 | 13,140 | 30.00 | 27 | \$ | 645.88 | \$ | 1,343.31 | \$ | 1,989.19 | \$ | 645.88 | \$ | 1,349.14 | \$ | 1,995.03 | \$ | - | \$ | 5.83 | \$ | 5.83 | 0.3\% |
| 30 | 70 | 15,330 | 30.00 | 27 | \$ | 743.18 | \$ | 1,555.90 | \$ | 2,299.08 | \$ | 743.18 | \$ | 1,562.71 | \$ | 2,305.89 | \$ | - | \$ | 6.81 | \$ | 6.81 | 0.3\% |
| 30 | 80 | 17,520 | 30.00 | 27 | \$ | 840.48 | \$ | 1,768.49 | \$ | 2,608.97 | \$ | 840.48 | \$ | 1,776.27 | \$ | 2,616.75 | \$ |  | \$ | 7.78 | \$ | 7.78 | 0.3\% |
| 50 | 20 | 7,300 | 50.00 | 47 | \$ | 418.02 | \$ | 826.60 | \$ | 1,244.63 | \$ | 418.02 | \$ | 829.84 | \$ | 1,247.87 | \$ | - | \$ | 3.24 | \$ | 3.24 | 0.3\% |
| 50 | 30 | 10,950 | 50.00 | 47 | \$ | 580.19 | \$ | 1,180.92 | \$ | 1,761.11 | \$ | 580.19 | \$ | 1,185.78 | \$ | 1,765.97 | \$ | - | \$ | 4.86 | \$ | 4.86 | 0.3\% |
| 50 | 40 | 14,600 | 50.00 | 47 | \$ | 742.35 | \$ | 1,535.24 | \$ | 2,277.58 | \$ | 742.35 | \$ | 1,541.72 | \$ | 2,284.07 | \$ | - | \$ | 6.48 | \$ | 6.48 | 0.3\% |
| 50 | 50 | 18,250 | 50.00 | 47 | \$ | 904.51 | \$ | 1,889.55 | \$ | 2,794.06 | \$ | 904.51 | \$ | 1,897.66 | \$ | 2,802.17 | \$ | - | \$ | 8.10 | \$ | 8.10 | 0.3\% |
| 50 | 60 | 21,900 | 50.00 | 47 | \$ | 1,066.67 | \$ | 2,243.87 | \$ | 3,310.54 |  | 1,066.67 | \$ | 2,253.59 | \$ | 3,320.27 | \$ | - | \$ | 9.72 | \$ | 9.72 | 0.3\% |
| 50 | 70 | 25,550 | 50.00 | 47 | \$ | 1,228.84 | \$ | 2,598.19 | \$ | 3,827.02 | \$ | 1,228.84 | \$ | 2,609.53 | \$ | 3,838.36 | \$ | - | \$ | 11.34 | S | 11.34 | 0.3\% |
| 50 | 80 | 29,200 | 50.00 | 47 | \$ | 1,391.00 | \$ | 2,952.50 | \$ | 4,343.50 | \$ | 1,391.00 | \$ | 2,965.47 | \$ | 4,356.46 | \$ | - | \$ | 12.96 | \$ | 12.96 | 0.3\% |
| 75 | 30 | 16,425 | 75.00 | 72 |  | 862.93 | \$ | 1,775.14 | \$ | 2,638.07 | \$ | 862.93 | \$ | 1,782.44 | \$ | 2,645.37 | \$ | - | \$ | 7.29 | \$ | 7.29 | 0.3\% |
| 75 | 40 | 21,900 | 75.00 | 72 |  | 1,106.17 | \$ | 2,306.62 | \$ | 3,412.79 | \$ | 1,106.17 | \$ | 2,316.34 | \$ | 3,422.52 | \$ | - | \$ | 9.72 | \$ | 9.72 | 0.3\% |
| 75 | 50 | 27,375 | 75.00 | 72 | + | 1,349.42 | \$ | 2,838.09 | \$ | 4,187.51 | \$ | 1,349.42 | \$ | 2,850.25 | \$ | 4,199.66 | \$ | - | \$ | 12.15 | \$ | 12.15 | 0.3\% |
| 75 | 60 | 32,850 | 75.00 | 72 | \$ | 1,592.66 | \$ | 3,369.57 | \$ | 4,962.23 | \$ | 1,592.66 | \$ | 3,384.15 | \$ | 4,976.81 | \$ | - | \$ | 14.59 | \$ | 14.59 | 0.3\% |
| 75 | 70 | 38,325 | 75.00 | 72 | - | 1,835.90 | \$ | 3,901.04 | \$ | 5,736.95 | \$ | 1,835.90 | \$ | 3,918.06 | \$ | 5,753.96 | \$ | - | \$ | 17.02 | \$ | 17.02 | 0.3\% |
| 75 | 80 | 43,800 | 75.00 | 72 | \$ | 2,079.15 | \$ | 4,432.52 | \$ | 6,511.66 | \$ | 2,079.15 | \$ | 4,451.96 | \$ | 6,531.11 | \$ | - | \$ | 19.45 | \$ | 19.45 | 0.3\% |
| 75 | 90 | 49,275 | 75.00 | 72 | \$ | 2,322.39 | \$ | 4,963.99 | \$ | 7,286.38 | \$ | 2,322.39 | \$ | 4,985.87 | \$ | 7,308.26 | \$ | - | \$ | 21.88 | \$ | 21.88 | 0.3\% |
| 100 | 30 | 21,900 | 100.00 | 97 | \$ | 1,145.67 | \$ | 2,369.37 | \$ | 3,515.04 | \$ | 1,145.67 | \$ | 2,379.09 | \$ | 3,524.77 | \$ | - | \$ | 9.72 | \$ | 9.72 | 0.3\% |
| 100 | 40 | 29,200 | 100.00 | 97 | \$ | 1,470.00 | \$ | 3,078.00 | \$ | 4,548.00 | \$ | 1,470.00 | \$ | 3,090.97 | \$ | 4,560.96 | \$ | - | \$ | 12.96 |  | 12.96 | 0.3\% |
| 100 | 50 | 36,500 | 100.00 | 97 | \$ | 1,794.32 | \$ | 3,786.63 | \$ | 5,580.96 | \$ | 1,794.32 | \$ | 3,802.84 | \$ | 5,597.16 | \$ | - | \$ | 16.21 | \$ | 16.21 | 0.3\% |
| 100 | 60 | 43,800 | 100.00 | 97 | \$ | 2,118.65 | \$ | 4,495.27 | \$ | 6,613.91 | \$ | 2,118.65 | \$ | 4,514.71 | \$ | 6,633.36 | \$ | - | \$ | 19.45 | \$ | 19.45 | 0.3\% |
| 100 | 70 | 51,100 | 100.00 | 97 | \$ | 2,442.97 | \$ | 5,203.90 | \$ | 7,646.87 | \$ | 2,442.97 | \$ | 5,226.59 | \$ | 7,669.56 | \$ | - | \$ | 22.69 | \$ | 22.69 | 0.3\% |
| 100 | 80 | 58,400 | 100.00 | 97 | \$ | 2,767.30 | \$ | 5,912.53 | \$ | 8,679.83 | \$ | 2,767.30 | \$ | 5,938.46 | \$ | 8,705.76 | \$ | - | \$ | 25.93 | \$ | 25.93 | 0.3\% |
| 100 | 90 | 65,700 | 100.00 | 97 | \$ | 3,091.62 | \$ | 6,621.17 | \$ | 9,712.79 | \$ | 3,091.62 | \$ | 6,650.34 | \$ | 9,741.96 | \$ | - | \$ | 29.17 | \$ | 29.17 | 0.3\% |
| 200 | 30 | 43,800 | 200.00 | 197 | \$ | 2,276.65 | \$ | 4,746.27 | - | 7,022.91 | \$ | 2,276.65 | \$ | 4,765.71 | \$ | 7,042.36 | \$ | - | \$ | 19.45 | \$ | 19.45 | 0.3\% |
| 200 | 40 | 58,400 | 200.00 | 197 |  | 2,925.30 |  | 6,163.53 | , | 9,088.83 | \$ | 2,925.30 | \$ | 6,189.46 | \$ | 9,114.76 | \$ | - | \$ | 25.93 | \$ | 25.93 | 0.3\% |
| 200 | 50 | 73,000 | 200.00 | 197 | \$ | 3,573.94 |  | 7,580.80 | \$ | 11,154.74 | \$ | 3,573.94 | \$ | 7,613.21 | \$ | 11,187.16 | \$ | - | \$ | 32.41 | \$ | 32.41 | 0.3\% |
| 200 | 60 | 87,600 | 200.00 | 197 |  | 4,222.59 | \$ | 8,998.06 | S | 13,220.66 | \$ | 4,222.59 | \$ | 9,036.96 | \$ | 13,259.55 | \$ | - | \$ | 38.89 | \$ | 38.89 | 0.3\% |
| 200 | 70 | 102,200 | 200.00 | 197 | \$ | 4,871.24 | \$ | 10,415.33 | \$ | 15,286.57 | \$ | 4,871.24 | \$ | 10,460.71 | \$ | 15,331.95 | \$ | - | \$ | 45.38 | \$ | 45.38 | 0.3\% |
| 200 | 80 | 116,800 | 200.00 | 197 | \$ | 5,519.89 | \$ | 11,832.60 | \$ | 17,352.49 | \$ | 5,519.89 | \$ | 11,884.46 | \$ | 17,404.35 | \$ | - | \$ | 51.86 | \$ | 51.86 | 0.3\% |
| 200 | 90 | 131,400 | 200.00 | 197 | \$ | 6,168.54 | \$ | 13,249.86 | \$ | 19,418.40 | \$ | 6,168.54 | \$ | 13,308.20 | \$ | 19,476.74 |  | - | S | 58.34 | \$ | 58.34 | 0.3\% |


| Present Rates vs. <br> Proposed Rates |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Demand | Load <br> Factor | Energy |  |  | Present Distribution |  | PresentBGS and Other Charges |  | Present <br> Total <br> (\$) |  | New Distribution |  | New <br> BGS and Other Charges |  |  | New <br> Total | Difference |  | Difference |  | Total Difference |  | Total Difference |
| (kW) | (\%) | (kWh) | Dist kW | Trans kW |  | (\$) |  |  |  |  |  | (\$) |  |  |  | (\$) |  |  |  |  |  | \$) | (\%) |
| 5 | 20 | 730 | 5.00 | 2 | \$ | 53.25 | \$ | 73.05 | \$ | 126.29 | \$ | 53.25 | \$ | 73.37 | \$ | 126.62 | \$ | - | \$ | 0.32 | \$ | 0.32 | 0.3\% |
| 5 | 30 | 1,095 | 5.00 | 2 | \$ | 69.15 | \$ | 107.29 | \$ | 176.45 | \$ | 69.15 | \$ | 107.78 | \$ | 176.93 | \$ | - | \$ | 0.49 | \$ | 0.49 | 0.3\% |
| 5 | 40 | 1,460 | 5.00 | 2 | \$ | 85.06 | \$ | 141.54 | \$ | 226.60 | \$ | 85.06 | \$ | 142.19 | \$ | 227.25 | \$ | - | \$ | 0.65 | \$ | 0.65 | 0.3\% |
| 5 | 50 | 1,825 | 5.00 | 2 | \$ | 100.97 | \$ | 175.79 | \$ | 276.75 | \$ | 100.97 | \$ | 176.60 | \$ | 277.56 | \$ | - | \$ | 0.81 | \$ | 0.81 | 0.3\% |
| 5 | 60 | 2,190 | 5.00 | 2 | \$ | 116.87 | \$ | 210.03 | \$ | 326.90 | \$ | 116.87 | \$ | 211.00 | \$ | 327.88 | \$ | - | \$ | 0.97 | \$ | 0.97 | 0.3\% |
| 5 | 70 | 2,555 | 5.00 | 2 | \$ | 132.78 | \$ | 244.28 | \$ | 377.06 | \$ | 132.78 | \$ | 245.41 | \$ | 378.19 | \$ | - | \$ | 1.13 | \$ | 1.13 | 0.3\% |
| 5 | 80 | 2,920 | 5.00 | 2 | \$ | 148.68 | \$ | 278.52 | \$ | 427.21 | \$ | 148.68 | \$ | 279.82 | \$ | 428.51 | \$ | - | \$ | 1.30 | \$ | 1.30 | 0.3\% |
| 10 | 20 | 1,460 | 10.00 | 7 | \$ | 91.79 | \$ | 152.92 | \$ | 244.71 | \$ | 91.79 | \$ | 153.57 | \$ | 245.36 | \$ | - | \$ | 0.65 | \$ | 0.65 | 0.3\% |
| 10 | 30 | 2,190 | 10.00 | 7 | \$ | 123.61 | \$ | 221.41 | \$ | 345.02 | \$ | 123.61 | \$ | 222.39 | \$ | 345.99 | \$ | - | \$ | 0.97 | \$ | 0.97 | 0.3\% |
| 10 | 40 | 2,920 | 10.00 | 7 | \$ | 155.42 | \$ | 289.91 | \$ | 445.33 | \$ | 155.42 | \$ | 291.20 | \$ | 446.62 | \$ |  | \$ | 1.30 | \$ | 1.30 | 0.3\% |
| 10 | 50 | 3,650 | 10.00 | 7 | \$ | 187.23 | \$ | 358.40 | \$ | 545.63 | \$ | 187.23 | \$ | 360.02 | \$ | 547.25 | \$ |  | \$ | 1.62 | \$ | 1.62 | 0.3\% |
| 10 | 60 | 4,380 | 10.00 | 7 | \$ | 219.04 | \$ | 426.89 | \$ | 645.94 | \$ | 219.04 | \$ | 428.84 | \$ | 647.88 | \$ | - | \$ | 1.94 | \$ | 1.94 | 0.3\% |
| 10 | 70 | 5,110 | 10.00 | 7 | \$ | 250.86 | \$ | 495.39 | \$ | 746.24 | \$ | 250.86 | \$ | 497.65 | \$ | 748.51 | \$ | - | \$ | 2.27 | \$ | 2.27 | 0.3\% |
| 10 | 80 | 5,840 | 10.00 | 7 | \$ | 282.67 | \$ | 563.88 | \$ | 846.55 | \$ | 282.67 | \$ | 566.47 | \$ | 849.14 | \$ | - | \$ | 2.59 | \$ | 2.59 | 0.3\% |
| 20 | 20 | 2,920 | 20.00 | 17 | \$ | 168.88 | \$ | 312.67 | \$ | 481.56 | \$ | 168.88 | \$ | 313.97 | \$ | 482.86 | \$ | - | \$ | 1.30 | \$ | 1.30 | 0.3\% |
| 20 | 30 | 4,380 | 20.00 | 17 | \$ | 232.51 | \$ | 449.66 | \$ | 682.17 | \$ | 232.51 | \$ | 451.60 | \$ | 684.12 | \$ | - | \$ | 1.94 | \$ | 1.94 | 0.3\% |
| 20 | 40 | 5,840 | 20.00 | 17 | \$ | 296.14 | \$ | 586.65 | \$ | 882.78 | \$ | 296.14 | \$ | 589.24 | \$ | 885.37 | \$ | - | \$ | 2.59 | \$ | 2.59 | 0.3\% |
| 20 | 50 | 7,300 | 20.00 | 17 | \$ | 359.76 | \$ | 723.63 | \$ | 1,083.39 | \$ | 359.76 | \$ | 726.87 | \$ | 1,086.63 | \$ | - | \$ | 3.24 | \$ | 3.24 | 0.3\% |
| 20 | 60 | 8,760 | 20.00 | 17 | \$ | 423.39 | \$ | 860.62 | \$ | 1,284.00 | \$ | 423.39 | \$ | 864.51 | \$ | 1,287.89 | \$ | - | \$ | 3.89 | \$ | 3.89 | 0.3\% |
| 20 | 70 | 10,220 | 20.00 | 17 | \$ | 487.01 | \$ | 997.60 | \$ | 1,484.62 | \$ | 487.01 | \$ | 1,002.14 | \$ | 1,489.15 | \$ |  | \$ | 4.54 | \$ | 4.54 | 0.3\% |
| 20 | 80 | 11,680 | 20.00 | 17 | \$ | 550.64 | \$ | 1,134.59 | \$ | 1,685.23 | \$ | 550.64 | \$ | 1,139.77 | \$ | 1,690.41 | \$ | - | \$ | 5.19 | \$ | 5.19 | 0.3\% |
| 30 | 20 | 4,380 | 30.00 | 27 | \$ | 245.98 | \$ | 472.43 | \$ | 718.40 | \$ | 245.98 | \$ | 474.37 | \$ | 720.35 | \$ | - | \$ | 1.94 | \$ | 1.94 | 0.3\% |
| 30 | 30 | 6,570 | 30.00 | 27 | \$ | 341.42 | \$ | 677.90 | \$ | 1,019.32 | \$ | 341.42 | \$ | 680.82 | \$ | 1,022.24 | \$ | - | \$ | 2.92 | \$ | 2.92 | 0.3\% |
| 30 | 40 | 8,760 | 30.00 | 27 | \$ | 436.85 | \$ | 883.38 | \$ | 1,320.24 | \$ | 436.85 | \$ | 887.27 | \$ | 1,324.13 | \$ | - | \$ | 3.89 | \$ | 3.89 | 0.3\% |
| 30 | 50 | 10,950 | 30.00 | 27 | \$ | 532.29 | \$ | 1,088.86 | \$ | 1,621.15 | \$ | 532.29 | \$ | 1,093.72 | \$ | 1,626.02 | \$ | - | \$ | 4.86 | \$ | 4.86 | 0.3\% |
| 30 | 60 | 13,140 | 30.00 | 27 | \$ | 627.73 | \$ | 1,294.34 | \$ | 1,922.07 | \$ | 627.73 | \$ | 1,300.17 | \$ | 1,927.91 | \$ | - | \$ | 5.83 | \$ | 5.83 | 0.3\% |
| 30 | 70 | 15,330 | 30.00 | 27 | \$ | 723.17 | \$ | 1,499.82 | \$ | 2,222.99 | \$ | 723.17 | \$ | 1,506.62 | \$ | 2,229.80 | \$ | - | \$ | 6.81 | \$ | 6.81 | 0.3\% |
| 30 | 80 | 17,520 | 30.00 | 27 | \$ | 818.61 | \$ | 1,705.30 | \$ | 2,523.91 | \$ | 818.61 | \$ | 1,713.07 | \$ | 2,531.68 | \$ | - |  | 7.78 | \$ | 7.78 | 0.3\% |
| 50 | 20 | 7,300 | 50.00 | 47 | \$ | 400.16 | \$ | 791.93 | \$ | 1,192.09 | \$ | 400.16 | \$ | 795.17 | \$ | 1,195.33 | \$ | - | \$ | 3.24 | \$ | 3.24 | 0.3\% |
| 50 | 30 | 10,950 | 50.00 | 47 | \$ | 559.23 | \$ | 1,134.39 | \$ | 1,693.62 | \$ | 559.23 | \$ | 1,139.26 | \$ | 1,698.48 | \$ | - | \$ | 4.86 | \$ | 4.86 | 0.3\% |
| 50 | 40 | 14,600 | 50.00 | 47 | \$ | 718.29 | \$ | 1,476.86 | \$ | 2,195.15 | \$ | 718.29 | \$ | 1,483.34 | \$ | 2,201.63 | \$ | - | \$ | 6.48 | \$ | 6.48 | 0.3\% |
| 50 | 50 | 18,250 | 50.00 | 47 | \$ | 877.36 | \$ | 1,819.32 | \$ | 2,696.68 | \$ | 877.36 | \$ | 1,827.42 | \$ | 2,704.78 | \$ | - | \$ | 8.10 | \$ | 8.10 | 0.3\% |
| 50 | 60 | 21,900 | 50.00 | 47 | \$ | 1,036.42 | \$ | 2,161.79 | \$ | 3,198.21 | \$ | ,036.42 | \$ | 2,171.51 | \$ | 3,207.93 | \$ | - | \$ | 9.72 | \$ | 9.72 | 0.3\% |
| 50 | 70 | 25,550 | 50.00 | 47 | \$ | 1,195.49 | S | 2,504.25 | \$ | 3,699.73 | \$ | 1,195.49 | \$ | 2,515.59 | \$ | 3,711.08 | \$ | - | \$ | 11.34 | \$ | 11.34 | 0.3\% |
| 50 | 80 | 29,200 | 50.00 | 47 | \$ | 1,354.55 | \$ | 2,846.71 | \$ | 4,201.26 | \$ | 1,354.55 | \$ | 2,859.68 | \$ | 4,214.23 | \$ | - | \$ | 12.96 | \$ | 12.96 | 0.3\% |
| 75 | 30 | 16,425 | 75.00 | 72 | \$ | 831.49 | \$ | 1,705.01 |  | 2,536.50 | \$ | 831.49 | \$ | 1,712.30 | \$ | 2,543.79 | \$ | - | \$ | 7.29 | \$ | 7.29 | 0.3\% |
| 75 | 40 | 21,900 | 75.00 | 72 | S | 1,070.09 | \$ | 2,218.70 | \$ | 3,288.79 | \$ | 1,070.09 | \$ | 2,228.43 | \$ | 3,298.51 | \$ | - | \$ | 9.72 | \$ | 9.72 | 0.3\% |
| 75 | 50 | 27,375 | 75.00 | 72 | \$ | 1,308.68 | \$ | 2,732.40 | \$ | 4,041.08 | \$ | ,308.68 | \$ | 2,744.55 | \$ | 4,053.24 | \$ | - | \$ | 12.15 | \$ | 12.15 | 0.3\% |
| 75 | 60 | 32,850 | 75.00 | 72 | \$ | 1,547.28 | \$ | 3,246.09 | \$ | 4,793.37 | \$ | 1,547.28 | \$ | 3,260.68 | \$ | 4,807.96 | \$ | - | \$ | 14.59 | \$ | 14.59 | 0.3\% |
| 75 | 70 | 38,325 | 75.00 | 72 | \$ | 1,785.88 | \$ | 3,759.79 | \$ | 5,545.67 | \$ | 1,785.88 | \$ | 3,776.80 | \$ | 5,562.68 | \$ | - | \$ | 17.02 | \$ | 17.02 | 0.3\% |
| 75 | 80 | 43,800 | 75.00 | 72 | \$ | 2,024.47 | \$ | 4,273.48 | \$ | 6,297.96 | \$ | 2,024.47 | \$ | 4,292.93 | \$ | 6,317.41 | \$ | - |  | 19.45 | \$ | 19.45 | 0.3\% |
| 75 | 90 | 49,275 | 75.00 | 72 | \$ | 2,263.07 | \$ | 4,787.18 | \$ | 7,050.25 | \$ | 2,263.07 | \$ | 4,809.06 | \$ | 7,072.13 | \$ | - | \$ | 21.88 | \$ | 21.88 | 0.3\% |
| 100 | 30 | 21,900 | 100.00 | 97 | \$ | 1,103.75 | \$ | 2,275.62 | \$ | 3,379.37 | \$ | 1,103.75 | \$ | 2,285.34 | \$ | 3,389.10 | \$ | - | \$ | 9.72 | \$ | 9.72 | 0.3\% |
| 100 | 40 | 29,200 | 100.00 | 97 | \$ | 1,421.88 | \$ | 2,960.55 | \$ | 4,382.43 | \$ | 1,421.88 | \$ | 2,973.51 | \$ | 4,395.39 | \$ | - | \$ | 12.96 | \$ | 12.96 | 0.3\% |
| 100 | 50 | 36,500 | 100.00 | 97 | \$ | 1,740.01 | \$ | 3,645.47 | \$ | 5,385.49 | \$ | 1,740.01 | \$ | 3,661.68 | \$ | 5,401.69 | \$ | - | \$ | 16.21 | \$ | 16.21 | 0.3\% |
| 100 | 60 | 43,800 | 100.00 | 97 | \$ | 2,058.14 |  | 4,330.40 | \$ | 6,388.54 | \$ | 2,058.14 | \$ | 4,349.85 | \$ | 6,407.99 | \$ | - | \$ | 19.45 | \$ | 19.45 | 0.3\% |
| 100 | 70 | 51,100 | 100.00 | 97 | \$ | 2,376.27 | \$ | 5,015.33 | \$ | 7,391.60 | \$ | 2,376.27 | \$ | 5,038.02 | \$ | 7,414.29 | \$ | - | \$ | 22.69 | \$ | 22.69 | 0.3\% |
| 100 | 80 | 58,400 | 100.00 | 97 | \$ | 2,694.40 |  | 5,700.26 | \$ | 8,394.66 | \$ | 2,694.40 | \$ | 5,726.19 | \$ | 8,420.58 | \$ | - | \$ | 25.93 | \$ | 25.93 | 0.3\% |
| 100 | 90 | 65,700 | 100.00 | 97 | \$ | 3,012.53 | \$ | 6,385.18 | \$ | 9,397.71 | \$ | 3,012.53 | \$ | 6,414.35 | \$ | 9,426.88 | \$ | - | \$ | 29.17 | \$ | 29.17 | 0.3\% |
| 200 | 30 | 43,800 | 200.00 | 197 | \$ | 2,192.81 | \$ | 4,558.07 | \$ | 6,750.88 | \$ | 2,192.81 | \$ | 4,577.51 | \$ | 6,770.32 | \$ | - | \$ | 19.45 | \$ | 19.45 | 0.3\% |
| 200 | 40 | 58,400 | 200.00 | 197 | \$ | 2,829.07 | \$ | 5,927.92 | \$ | 8,756.99 | \$ | 2,829.07 | \$ | 5,953.85 | \$ | 8,782.92 | \$ | - | \$ | 25.93 | \$ | 25.93 | 0.3\% |
| 200 | 50 | 73,000 | 200.00 | 197 | \$ | 3,465.32 | \$ | 7,297.78 | \$ | 10,763.10 | \$ | 3,465.32 | \$ | 7,330.19 | \$ | 10,795.51 | \$ | - | \$ | 32.41 | \$ | 32.41 | 0.3\% |
| 200 | 60 | 87,600 | 200.00 | 197 | \$ | 4,101.58 | \$ | 8,667.63 | \$ | 12,769.21 | \$ | 4,101.58 | \$ | 8,706.53 | \$ | 12,808.11 | \$ | - | \$ | 38.89 | \$ | 38.89 | 0.3\% |
| 200 | 70 | 102,200 | 200.00 | 197 | \$ | 4,737.84 | \$ | 10,037.49 | \$ | 14,775.33 | \$ | 4,737.84 | \$ | 10,082.86 | \$ | 14,820.70 |  | - | \$ | 45.38 | \$ | 45.38 | 0.3\% |
| 200 | 80 | 116,800 | 200.00 | 197 | \$ | 5,374.10 | \$ | 11,407.34 | \$ | 16,781.44 | \$ | 5,374.10 | \$ | 11,459.20 | \$ | 16,833.30 | \$ | - | \$ | 51.86 | \$ | 51.86 | 0.3\% |
| 200 | 90 | 131,400 | 200.00 | 197 | \$ | 6,010.36 | \$ | 12,777.20 | \$ | 18,787.55 | \$ | 6,010.36 | \$ | 12,835.54 | \$ | 18,845.90 | \$ | - |  | 58.34 | \$ | 58.34 | 0.3\% |

ATLANTIC CITY ELECTRIC COMPANY
$\frac{\text { ANNUAL GENERAL SERVICE SECONDARY ("AGS Secondary"' }}{8 \text { WINTER MONTHS (October Through May) }}$

| Present Rates vs. <br> Proposed Rates |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Demand | Load Factor | Energy |  |  | Present Distribution |  | Present <br> BGS and Other Charges |  | Present Total |  | New Distribution |  | New <br> BGS and Other Charges |  | New Total |  | Difference Distribution |  | Difference BGS and Other Charges |  | Total Difference |  | Total Difference |
| (kW) | (\%) | (kWh) | Metered kW | Billed kW |  | (\$) |  | (\$) |  |  |  | (\$) |  | (\$) |  | (\$) |  | (\$) |  | (\$) |  | (\$) | (\%) |
| 25 | 20 | 3,650 | 25 | 25 | \$ | 471.47 | \$ | 447.27 | \$ | 918.74 | \$ | 471.47 | \$ | 448.89 | \$ | 920.36 | \$ | - | \$ | 1.62 | \$ | 1.62 | 0.2\% |
| 25 | 30 | 5,475 | 25 | 25 | \$ | 471.47 | \$ | 628.40 | \$ | 1,099.87 | \$ | 471.47 | \$ | 630.83 | \$ | 1,102.30 | \$ |  | \$ | 2.43 | \$ | 2.43 | 0.2\% |
| 25 | 40 | 7,300 | 25 | 25 | \$ | 471.47 | \$ | 809.53 | \$ | 1,281.00 | \$ | 471.47 | \$ | 812.77 | \$ | 1,284.24 | \$ | - | \$ | 3.24 | \$ | 3.24 | 0.3\% |
| 25 | 50 | 9,125 | 25 | 25 | \$ | 471.47 | \$ | 990.67 | \$ | 1,462.14 | \$ | 471.47 | \$ | 994.72 | \$ | 1,466.19 | \$ | - | \$ | 4.05 | \$ | 4.05 | 0.3\% |
| 25 | 60 | 10,950 | 25 | 25 | \$ | 471.47 | \$ | 1,171.80 | \$ | 1,643.27 | \$ | 471.47 | \$ | 1,176.66 | \$ | 1,648.13 | \$ | - | \$ | 4.86 | \$ | 4.86 | 0.3\% |
| 25 | 70 | 12,775 | 25 | 25 | \$ | 471.47 | \$ | 1,352.93 | \$ | 1,824.40 | \$ | 471.47 | \$ | 1,358.60 | \$ | 1,830.07 | \$ |  | \$ | 5.67 | \$ | 5.67 | 0.3\% |
| 25 | 80 | 14,600 | 25 | 25 | \$ | 471.47 | \$ | 1,534.06 | \$ | 2,005.53 | \$ | 471.47 | S | 1,540.55 | \$ | 2,012.02 | \$ |  | \$ | 6.48 | \$ | 6.48 | 0.3\% |
| 50 | 20 | 7,300 | 50 | 50 | \$ | 749.72 | \$ | 894.53 | \$ | 1,644.25 | \$ | 749.72 | \$ | 897.77 | \$ | 1,647.49 | \$ |  | \$ | 3.24 | \$ | 3.24 | 0.2\% |
| 50 | 30 | 10,950 | 50 | 50 | \$ | 749.72 | \$ | 1,256.80 | \$ | 2,006.52 | \$ | 749.72 | \$ | 1,261.66 | \$ | 2,011.38 | \$ | - | \$ | 4.86 | \$ | 4.86 | 0.2\% |
| 50 | 40 | 14,600 | 50 | 50 | \$ | 749.72 | \$ | 1,619.06 | \$ | 2,368.78 | \$ | 749.72 | \$ | 1,625.55 | \$ | 2,375.27 | \$ | - | \$ | 6.48 | \$ | 6.48 | 0.3\% |
| 50 | 50 | 18,250 | 50 | 50 | \$ | 749.72 | \$ | 1,981.33 | \$ | 2,731.05 | \$ | 749.72 | \$ | 1,989.43 | \$ | 2,739.15 | \$ | - | \$ | 8.10 | \$ | 8.10 | 0.3\% |
| 50 | 60 | 21,900 | 50 | 50 | \$ | 749.72 | \$ | 2,343.60 | \$ | 3,093.32 | \$ | 749.72 | \$ | 2,353.32 | \$ | 3,103.04 | \$ | - | \$ | 9.72 | \$ | 9.72 | 0.3\% |
| 50 | 70 | 25,550 | 50 | 50 | \$ | 749.72 | \$ | 2,705.86 | \$ | 3,455.58 | \$ | 749.72 |  | 2,717.21 | \$ | 3,466.93 | \$ |  | \$ | 11.34 | \$ | 11.34 | 0.3\% |
| 50 | 80 | 29,200 | 50 | 50 | \$ | 749.72 | \$ | 3,068.13 | \$ | 3,817.85 | \$ | 749.72 | S | 3,081.09 | \$ | 3,830.81 | \$ | - | \$ | 12.96 | \$ | 12.96 | 0.3\% |
| 100 | 20 | 14,600 | 100 | 100 | \$ | 1,306.22 | \$ | 1,789.06 | \$ | 3,095.28 | \$ | 1,306.22 | \$ | 1,795.55 | \$ | 3,101.77 | \$ | - | \$ | 6.48 | \$ | 6.48 | 0.2\% |
| 100 | 30 | 21,900 | 100 | 100 | \$ | 1,306.22 | \$ | 2,513.60 | \$ | 3,819.82 | \$ | 1,306.22 | \$ | 2,523.32 | \$ | 3,829.54 | \$ | - | \$ | 9.72 | \$ | 9.72 | 0.3\% |
| 100 | 40 | 29,200 | 100 | 100 | \$ | 1,306.22 | \$ | 3,238.13 | \$ | 4,544.35 | \$ | 1,306.22 | \$ | 3,251.09 | \$ | 4,557.31 | \$ | - | \$ | 12.96 | \$ | 12.96 | 0.3\% |
| 100 | 50 | 36,500 | 100 | 100 | \$ | 1,306.22 | \$ | 3,962.66 | \$ | 5,268.88 | \$ | 1,306.22 | \$ | 3,978.87 | \$ | 5,285.09 | \$ |  | \$ | 16.21 | \$ | 16.21 | 0.3\% |
| 100 | 60 | 43,800 | 100 | 100 | \$ | 1,306.22 | \$ | 4,687.19 | \$ | 5,993.41 | \$ | 1,306.22 | \$ | 4,706.64 | \$ | 6,012.86 | \$ | - | \$ | 19.45 | \$ | 19.45 | 0.3\% |
| 100 | 70 | 51,100 | 100 | 100 | \$ | 1,306.22 | \$ | 5,411.73 | \$ | 6,717.95 | S | 1,306.22 | \$ | 5,434.41 | \$ | 6,740.63 | \$ | - | \$ | 22.69 | \$ | 22.69 | 0.3\% |
| 100 | 80 | 58,400 | 100 | 100 | \$ | 1,306.22 | \$ | 6,136.26 | \$ | 7,442.48 | \$ | 1,306.22 | \$ | 6,162.19 | \$ | 7,468.41 | \$ | - | \$ | 25.93 | \$ | 25.93 | 0.3\% |
| 300 | 20 | 43,800 | 300 | 300 | \$ | 3,532.22 | \$ | 5,367.19 | \$ | 8,899.41 | \$ | 3,532.22 | \$ | 5,386.64 | \$ | 8,918.86 | \$ | - | \$ | 19.45 | \$ | 19.45 | 0.2\% |
| 300 | 30 | 65,700 | 300 | 300 | \$ | 3,532.22 | \$ | 7,540.79 | \$ | 11,073.01 | \$ | 3,532.22 | \$ | 7,569.96 | \$ | 11,102.18 | \$ |  | \$ | 29.17 | \$ | 29.17 | 0.3\% |
| 300 | 40 | 87,600 | 300 | 300 | \$ | 3,532.22 | \$ | 9,714.39 | \$ | 13,246.61 | \$ | 3,532.22 | \$ | 9,753.28 | \$ | 13,285.50 | \$ |  | \$ | 38.89 | \$ | 38.89 | 0.3\% |
| 300 | 50 | 109,500 | 300 | 300 | \$ | 3,532.22 | \$ | 11,887.98 | \$ | 15,420.20 | \$ | 3,532.22 | \$ | 11,936.60 | \$ | 15,468.82 | \$ | - | \$ | 48.62 | \$ | 48.62 | 0.3\% |
| 300 | 60 | 131,400 | 300 | 300 | \$ | 3,532.22 | \$ | 14,061.58 | \$ | 17,593.80 | \$ | 3,532.22 | \$ | 14,119.92 | \$ | 17,652.14 | \$ | - | \$ | 58.34 | \$ | 58.34 | 0.3\% |
| 300 | 70 | 153,300 | 300 | 300 | \$ | 3,532.22 | \$ | 16,235.18 | \$ | 19,767.40 | \$ | 3,532.22 | \$ | 16,303.24 | \$ | 19,835.46 | \$ |  | \$ | 68.07 | \$ | 68.07 | 0.3\% |
| 300 | 80 | 175,200 | 300 | 300 | \$ | 3,532.22 | \$ | 18,408.78 | \$ | 21,941.00 | \$ | 3,532.22 | \$ | 18,486.56 | \$ | 22,018.78 | \$ | - | \$ | 77.79 | \$ | 77.79 | 0.4\% |
| 500 | 20 | 73,000 | 500 | 500 | \$ | 5,758.22 | \$ | 8,945.32 | \$ | 14,703.54 | \$ | 5,758.22 | \$ | 8,977.74 | \$ | 14,735.96 | \$ | - | \$ | 32.41 |  | 32.41 | 0.2\% |
| 500 | 30 | 109,500 | 500 | 500 | \$ | 5,758.22 | \$ | 12,567.98 | \$ | 18,326.20 |  | 5,758.22 | \$ | 12,616.60 | \$ | 18,374.82 | \$ | - | \$ | 48.62 | \$ | 48.62 | 0.3\% |
| 500 | 40 | 146,000 | 500 | 500 | \$ | 5,758.22 | \$ | 16,190.65 | \$ | 21,948.87 | \$ | 5,758.22 | \$ | 16,255.47 | \$ | 22,013.69 | \$ | - | \$ | 64.82 | \$ | 64.82 | 0.3\% |
| 500 | 50 | 182,500 | 500 | 500 | \$ | 5,758.22 | \$ | 19,813.31 | \$ | 25,571.53 | \$ | 5,758.22 | \$ | 19,894.34 | \$ | 25,652.56 | \$ | - | \$ | 81.03 | \$ | 81.03 | 0.3\% |
| 500 | 60 | 219,000 | 500 | 500 | \$ | 5,758.22 | \$ | 23,435.97 | \$ | 29,194.19 | \$ | 5,758.22 | \$ | 23,533.21 | \$ | 29,291.43 | \$ | - | \$ | 97.24 | \$ | 97.24 | 0.3\% |
| 500 | 70 | 255,500 | 500 | 500 | \$ | 5,758.22 | \$ | 27,058.63 | \$ | 32,816.85 | \$ | 5,758.22 | \$ | 27,172.07 | \$ | 32,930.29 | \$ | - | \$ | 113.44 | \$ | 113.44 | 0.3\% |
| 500 | 80 | 292,000 | 500 | 500 | \$ | 5,758.22 | \$ | 30,681.29 | \$ | 36,439.51 | \$ | 5,758.22 | \$ | 30,810.94 | \$ | 36,569.16 | \$ | - | \$ | 129.65 | \$ | 129.65 | 0.4\% |
| 750 | 30 | 164,250 | 750 | 750 | \$ | 8,540.72 | \$ | 18,851.98 | \$ | 27,392.70 | \$ | 8,540.72 | \$ | 18,924.90 | \$ | 27,465.62 | \$ | - | \$ | 72.93 | \$ | 72.93 | 0.3\% |
| 750 | 40 | 219,000 | 750 | 750 | \$ | 8,540.72 | \$ | 24,285.97 | \$ | 32,826.69 | \$ | 8,540.72 | \$ | 24,383.21 | \$ | 32,923.93 | \$ | - | \$ | 97.24 | \$ | 97.24 | 0.3\% |
| 750 | 50 | 273,750 | 750 | 750 | \$ | 8,540.72 | \$ | 29,719.96 | \$ | 38,260.68 | \$ | 8,540.72 | \$ | 29,841.51 | \$ | 38,382.23 | \$ | - | \$ | 121.54 | S | 121.54 | 0.3\% |
| 750 | 60 | 328,500 | 750 | 750 | \$ | 8,540.72 | \$ | 35,153.95 | \$ | 43,694.67 | \$ | 8,540.72 | \$ | 35,299.81 | \$ | 43,840.53 | \$ | - | \$ | 145.85 | \$ | 145.85 | 0.3\% |
| 750 | 70 | 383,250 | 750 | 750 | \$ | 8,540.72 | \$ | 40,587.95 | \$ | 49,128.67 | \$ | 8,540.72 | \$ | 40,758.11 | \$ | 49,298.83 | \$ |  | \$ | 170.16 | \$ | 170.16 | 0.3\% |
| 750 | 80 | 438,000 | 750 | 750 | \$ | 8,540.72 | \$ | 46,021.94 | \$ | 54,562.66 | \$ | 8,540.72 | \$ | 46,216.41 | \$ | 54,757.13 | \$ | - | \$ | 194.47 | \$ | 194.47 | 0.4\% |
| 750 | 90 | 492,750 | 750 | 750 | \$ | 8,540.72 | \$ | 51,455.93 | - | 59,996.65 | \$ | 8,540.72 | \$ | 51,674.71 | \$ | 60,215.43 | \$ | - | \$ | 218.78 | S | 218.78 | 0.4\% |
| 1000 | 30 | 219,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 25,135.97 | \$ | 36,459.19 | S | 11,323.22 | \$ | 25,233.21 | \$ | 36,556.43 | \$ | - | \$ | 97.24 | \$ | 97.24 | 0.3\% |
| 1000 | 40 | 292,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 32,381.29 | \$ | 43,704.51 | \$ | 11,323.22 | \$ | 32,510.94 | \$ | 43,834.16 | \$ | - |  | 129.65 | \$ | 129.65 | 0.3\% |
| 1000 | 50 | 365,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 39,626.61 | \$ | 50,949.84 | \$ | 11,323.22 | \$ | 39,788.68 | \$ | 51,111.90 | \$ | - | \$ | 162.06 | \$ | 162.06 | 0.3\% |
| 1000 | 60 | 438,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 46,871.94 | \$ | 58,195.16 | \$ | 11,323.22 | \$ | 47,066.41 | \$ | 58,389.63 | \$ | - | \$ | 194.47 | \$ | 194.47 | 0.3\% |
| 1000 | 70 | 511,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 54,117.26 | \$ | 65,440.48 | \$ | 11,323.22 | \$ | 54,344.15 | \$ | 65,667.37 | \$ | - | \$ | 226.88 | \$ | 226.88 | 0.3\% |
| 1000 | 80 | 584,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 61,362.58 | \$ | 72,685.80 | \$ | 11,323.22 | \$ | 61,621.88 | \$ | 72,945.10 | \$ | - | \$ | 259.30 | \$ | 259.30 | 0.4\% |
| 1000 | 90 | 657,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 68,607.91 | \$ | 79,931.13 | \$ | 11,323.22 | \$ | 68,899.62 | \$ | 80,222.84 | \$ | - |  | 291.71 | \$ | 291.71 | 0.4\% |
| 2000 | 30 | 438,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 50,271.94 | \$ | 72,725.16 | \$ | 22,453.22 | \$ | 50,466.41 | \$ | 72,919.63 | \$ | - | \$ | 194.47 | \$ | 194.47 | 0.3\% |
| 2000 | 40 | 584,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 64,762.58 | \$ | 87,215.80 |  | 22,453.22 | \$ | 65,021.88 | \$ | 87,475.10 |  | - | \$ | 259.30 | \$ | 259.30 | 0.3\% |
| 2000 | 50 | 730,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 79,253.23 |  | 101,706.45 | \$ | 22,453.22 | \$ | 79,577.35 | \$ | 102,030.57 | \$ | - | \$ | 324.12 | \$ | 324.12 | 0.3\% |
| 2000 | 60 | 876,000 | 2,000 | 2,000 | - | 22,453.22 | \$ | 93,743.88 | \$ | 116,197.10 | \$ | 22,453.22 | \$ | 94,132.82 | \$ | 116,586.04 | \$ | - | \$ | 388.94 | \$ | 388.94 | 0.3\% |
| 2000 | 70 | 1,022,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 108,234.52 | \$ | 130,687.74 | \$ | 22,453.22 | \$ | 108,688.29 | \$ | 131,141.51 | \$ | - |  | 453.77 | \$ | 453.77 | 0.3\% |
| 2000 | 80 | 1,168,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 122,725.17 | \$ | 145,178.39 | \$ | 22,453.22 | \$ | 123,243.76 | \$ | 145,696.98 | \$ | - | \$ | 518.59 | \$ | 518.59 | 0.4\% |
| 2000 | 90 | 1,314,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 137,215.81 | \$ | 159,669.03 | \$ | 22,453.22 | \$ | 137,799.23 | \$ | 160,252.45 | \$ | - | \$ | 583.42 | \$ | 583.42 | 0.4\% |

ATLANTIC CITY ELECTRIC COMPANY
$\frac{\text { ANNUAL GENERAL SERVICE SECONDARY ("AGS Secondary"' }}{4 \text { SUMMER MONTHS (Je }}$
4 SUMMER MONTHS (June Through September)
Present Rates
vs.


ATLANTIC CITY ELECTRIC COMPANY
ANNUAL GENERAL SERVICE SECONDARY ("AGS Secondary"': Annual Average

Present Rates
vs.


Present Rates
Load

 |  |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $\%$ or |  |  |  |  |  |  |
| $(\mathrm{kWW})$ | Metered kW | Billed kW | D Demand | D Energy |  |  |
| 20 | 3,650 | 25 | 25 | $\$$ | 221.50 | $\$$ |

Present
Distribution $\quad \begin{gathered}\text { BGS and Other Chara }\end{gathered}$
vs.
Proposed Rates

| $(\mathrm{kWh})$ | Metered kw |
| :--- | :--- |
| 3 |  |
| 5 |  |

 3,650
5,475
7,300
9,125
10,950 $(\$)$
96565
$\frac{B G S}{}$ and Other Charges
$(\$)$ $\begin{gathered}\text { Present } \\ \text { Total }\end{gathered}$ New
Distributio

New
ribution
BGS and New
Other C $\qquad$ w
Difference
Difference Difference Difference Charges Total
Difference Total
Difference 965.65
965.65 421.88 S
59344
7 1,387.53 $\begin{array}{ll} & 96 \\ \$ & 966 \\ \$ & 9666\end{array}$

## ATLANTIC CITY ELECTRIC COMPANY ANNUAL GENERAL SERVICE PRIMARY ("AGS Primary"

4 SUMMER MONTHS (June Through September)


ATLANTIC CITY ELECTRIC COMPANY
ANNUAL GENERAL SERVICE PRIMARY ("AGS Primary")
Annual Average
vs.


## YEAR 2 BILL IMPACTS

| Present Rates vs. Proposed Rates |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Monthly | Present Delivery |  | Present Supply+T |  | Present Total |  | New Delivery |  | New <br> Supply+T |  | New <br> Total |  | Difference |  |  |  | Total |  | (\%) |
| Usage |  |  |  |  |  |  |  | $y+T$ |  |  |  | ence |  |
| (kWh) |  | (\$) |  |  |  | (\$) |  |  |  | (\$) |  |  |  | (\$) |  | \$) |  | (\$) |  |  |  |  |  |  |  |
| 0 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | - | \$ | - | \$ | - | 0.00\% |
| 25 | \$ | 7.87 | \$ | 2.61 | \$ | 10.48 | \$ | 7.87 | \$ | 2.62 | \$ | 10.49 | \$ | - | \$ | 0.01 | \$ | 0.01 | 0.10\% |
| 50 | \$ | 9.97 | \$ | 5.22 | \$ | 15.19 | \$ | 9.97 | \$ | 5.25 | \$ | 15.22 | \$ | - | \$ | 0.03 | \$ | 0.03 | 0.20\% |
| 75 | \$ | 12.07 | \$ | 7.83 | \$ | 19.90 | \$ | 12.07 | \$ | 7.87 | \$ | 19.94 | \$ | - | \$ | 0.04 | \$ | 0.04 | 0.20\% |
| 100 | \$ | 14.17 | \$ | 10.44 | \$ | 24.61 | \$ | 14.17 | \$ | 10.49 | \$ | 24.66 | \$ | - | \$ | 0.05 | \$ | 0.05 | 0.20\% |
| 150 | \$ | 18.37 | \$ | 15.65 | \$ | 34.02 | \$ | 18.37 | \$ | 15.74 | \$ | 34.11 | \$ | - | \$ | 0.09 | \$ | 0.09 | 0.26\% |
| 200 | \$ | 22.57 | \$ | 20.87 | \$ | 43.44 | \$ | 22.57 | \$ | 20.98 | \$ | 43.55 | \$ | - | \$ | 0.11 | \$ | 0.11 | 0.25\% |
| 250 | \$ | 26.77 | \$ | 26.09 | \$ | 52.86 | \$ | 26.77 | \$ | 26.23 | \$ | 53.00 | \$ | - | \$ | 0.14 | \$ | 0.14 | 0.26\% |
| 300 | \$ | 30.97 | \$ | 31.31 | \$ | 62.28 | \$ | 30.97 | \$ | 31.47 | \$ | 62.44 | \$ | - | \$ | 0.16 | \$ | 0.16 | 0.26\% |
| 350 | \$ | 35.17 | \$ | 36.53 | \$ | 71.70 | \$ | 35.17 | \$ | 36.72 | \$ | 71.89 | \$ | - | \$ | 0.19 | \$ | 0.19 | 0.26\% |
| 400 | \$ | 39.37 | \$ | 41.74 | \$ | 81.11 | \$ | 39.37 | \$ | 41.96 | \$ | 81.33 | \$ | - | \$ | 0.22 | \$ | 0.22 | 0.27\% |
| 450 | \$ | 43.57 | \$ | 46.96 | \$ | 90.53 | \$ | 43.57 | \$ | 47.21 | \$ | 90.78 | \$ | - | \$ | 0.25 | \$ | 0.25 | 0.28\% |
| 500 | \$ | 47.77 | \$ | 52.18 | \$ | 99.95 | \$ | 47.77 | \$ | 52.46 | \$ | 100.23 | \$ | - | \$ | 0.28 | \$ | 0.28 | 0.28\% |
| 600 | \$ | 56.17 | \$ | 62.62 | \$ | 118.79 | \$ | 56.17 | \$ | 62.95 | \$ | 119.12 | \$ | - | \$ | 0.33 | \$ | 0.33 | 0.28\% |
| 679 | \$ | 62.81 | \$ | 70.86 | \$ | 133.67 | \$ | 62.81 | \$ | 71.23 | \$ | 134.04 | \$ | - | \$ | 0.37 | \$ | 0.37 | 0.28\% |
| 700 | \$ | 64.57 | \$ | 73.05 | \$ | 137.62 | \$ | 64.57 | \$ | 73.44 | \$ | 138.01 | \$ | - | \$ | 0.39 | \$ | 0.39 | 0.28\% |
| 750 | \$ | 68.77 | \$ | 78.27 | \$ | 147.04 | \$ | 68.77 | \$ | 78.68 | \$ | 147.45 | \$ | - | \$ | 0.41 | \$ | 0.41 | 0.28\% |
| 800 | \$ | 72.97 | \$ | 83.49 | \$ | 156.46 | \$ | 72.97 | \$ | 83.93 | \$ | 156.90 | \$ | - | \$ | 0.44 | \$ | 0.44 | 0.28\% |
| 900 | \$ | 81.38 | \$ | 93.92 | \$ | 175.30 | \$ | 81.38 | \$ | 94.42 | \$ | 175.80 | \$ | - | \$ | 0.50 | \$ | 0.50 | 0.29\% |
| 1000 | \$ | 89.78 | \$ | 104.36 | \$ | 194.14 | \$ | 89.78 | \$ | 104.91 | \$ | 194.69 | \$ | - | \$ | 0.55 | \$ | 0.55 | 0.28\% |
| 1200 | \$ | 106.58 | \$ | 125.23 | \$ | 231.81 | \$ | 106.58 | \$ | 125.89 | \$ | 232.47 | \$ | - | \$ | 0.66 | \$ | 0.66 | 0.28\% |
| 1500 | \$ | 131.78 | \$ | 156.54 | \$ | 288.32 | \$ | 131.78 | \$ | 157.37 | \$ | 289.15 | \$ | - | \$ | 0.83 | \$ | 0.83 | 0.29\% |
| 2000 | \$ | 173.78 | \$ | 208.72 | \$ | 382.50 | \$ | 173.78 | \$ | 209.82 | \$ | 383.60 | \$ | - | \$ | 1.10 | \$ | 1.10 | 0.29\% |
| 2500 | \$ | 215.79 | \$ | 260.90 | \$ | 476.69 | \$ | 215.79 | \$ | 262.28 | \$ | 478.07 | \$ | - | \$ | 1.38 | \$ | 1.38 | 0.29\% |
| 3000 | \$ | 257.79 | \$ | 313.08 | \$ | 570.87 | \$ | 257.79 | \$ | 314.73 | \$ | 572.52 | \$ | - | \$ | 1.65 | \$ | 1.65 | 0.29\% |
| 3500 | \$ | 299.79 | \$ | 365.26 | \$ | 665.05 | \$ | 299.79 | \$ | 367.19 | \$ | 666.98 | \$ | - | \$ | 1.93 | \$ | 1.93 | 0.29\% |
| 4000 | \$ | 341.79 | \$ | 417.44 | \$ | 759.23 | \$ | 341.79 | \$ | 419.64 | \$ | 761.43 | \$ | - | \$ | 2.20 | \$ | 2.20 | 0.29\% |

## 4 SUMMER MONTHS (June Through September)

## Present Rates <br> vs.

Proposed Rates

| Monthly Usage (kWh) | Present Delivery |  | Present Supply+T |  | Present Total |  | New Delivery |  | New Supply+T |  | New <br> Total |  | Difference |  |  |  | Total |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Delivery | Supply+T |  | Difference |  |  |  |  |  |  |
|  |  | (\$) |  |  |  | \$) |  |  |  | (\$) |  | \$) |  | \$) |  | \$) |  |  |  |  |  |  | (\%) |
| 0 | \$ | 5.77 | \$ | - |  |  | \$ | 5.77 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | - | \$ | - | \$ | - | 0.00\% |
| 25 | \$ | 8.01 | \$ | 2.34 | \$ | 10.35 | \$ | 8.01 | \$ | 2.35 | \$ | 10.36 | \$ | - | \$ | 0.01 | \$ | 0.01 | 0.10\% |
| 50 | \$ | 10.25 | \$ | 4.67 | \$ | 14.92 | \$ | 10.25 | \$ | 4.70 | \$ | 14.95 | \$ | - | \$ | 0.03 | \$ | 0.03 | 0.20\% |
| 75 | \$ | 12.49 | \$ | 7.01 | \$ | 19.50 | \$ | 12.49 | \$ | 7.05 | \$ | 19.54 | \$ | - | \$ | 0.04 | \$ | 0.04 | 0.21\% |
| 100 | \$ | 14.73 | \$ | 9.35 | \$ | 24.08 | \$ | 14.73 | \$ | 9.40 | \$ | 24.13 | \$ | - | \$ | 0.05 | \$ | 0.05 | 0.21\% |
| 150 | \$ | 19.20 | \$ | 14.02 | \$ | 33.22 | \$ | 19.20 | \$ | 14.10 | \$ | 33.30 | \$ | - | \$ | 0.08 | \$ | 0.08 | 0.24\% |
| 200 | \$ | 23.68 | \$ | 18.69 | \$ | 42.37 | \$ | 23.68 | \$ | 18.80 | \$ | 42.48 | \$ | - | \$ | 0.11 | \$ | 0.11 | 0.26\% |
| 250 | \$ | 28.16 | \$ | 23.37 | \$ | 51.53 | \$ | 28.16 | \$ | 23.50 | \$ | 51.66 | \$ | - | \$ | 0.13 | \$ | 0.13 | 0.25\% |
| 300 | \$ | 32.64 | \$ | 28.04 | \$ | 60.68 | \$ | 32.64 | \$ | 28.20 | \$ | 60.84 | \$ | - | \$ | 0.16 | \$ | 0.16 | 0.26\% |
| 350 | \$ | 37.12 | \$ | 32.71 | \$ | 69.83 | \$ | 37.12 | \$ | 32.91 | \$ | 70.03 | \$ | - | \$ | 0.20 | \$ | 0.20 | 0.29\% |
| 400 | \$ | 41.59 | \$ | 37.39 | \$ | 78.98 | \$ | 41.59 | \$ | 37.61 | \$ | 79.20 | \$ | - | \$ | 0.22 | \$ | 0.22 | 0.28\% |
| 450 | \$ | 46.07 | \$ | 42.06 | \$ | 88.13 | \$ | 46.07 | \$ | 42.31 | \$ | 88.38 | \$ | - | \$ | 0.25 | \$ | 0.25 | 0.28\% |
| 500 | \$ | 50.55 | \$ | 46.73 | \$ | 97.28 | \$ | 50.55 | \$ | 47.01 | \$ | 97.56 | \$ | - | \$ | 0.28 | \$ | 0.28 | 0.29\% |
| 600 | \$ | 59.50 | \$ | 56.08 | \$ | 115.58 | \$ | 59.50 | \$ | 56.41 | \$ | 115.91 | \$ | - | \$ | 0.33 | \$ | 0.33 | 0.29\% |
| 679 | \$ | 66.58 | \$ | 63.46 | \$ | 130.04 | \$ | 66.58 | \$ | 63.84 | \$ | 130.42 | \$ | - | \$ | 0.38 | \$ | 0.38 | 0.29\% |
| 700 | \$ | 68.46 | \$ | 65.42 | \$ | 133.88 | \$ | 68.46 | \$ | 65.81 | \$ | 134.27 | \$ | - | \$ | 0.39 | \$ | 0.39 | 0.29\% |
| 750 | \$ | 72.94 | \$ | 70.10 | \$ | 143.04 | \$ | 72.94 | \$ | 70.51 | \$ | 143.45 | \$ | - | \$ | 0.41 | \$ | 0.41 | 0.29\% |
| 800 | \$ | 77.95 | \$ | 75.27 | \$ | 153.22 | \$ | 77.95 | \$ | 75.72 | \$ | 153.67 | \$ | - | \$ | 0.45 | \$ | 0.45 | 0.29\% |
| 900 | \$ | 87.98 | \$ | 85.63 | \$ | 173.61 | \$ | 87.98 | \$ | 86.12 | \$ | 174.10 | \$ | - | \$ | 0.49 | \$ | 0.49 | 0.28\% |
| 1000 | \$ | 98.01 | \$ | 95.98 | \$ | 193.99 | \$ | 98.01 | \$ | 96.53 | \$ | 194.54 | \$ | - | \$ | 0.55 | \$ | 0.55 | 0.28\% |
| 1200 | \$ | 118.07 | \$ | 116.68 | \$ | 234.75 | \$ | 118.07 | \$ | 117.35 | \$ | 235.42 | $\$$ | - | \$ | 0.67 | \$ | 0.67 | 0.29\% |
| 1500 | \$ | 148.17 | \$ | 147.74 | \$ | 295.91 | \$ | 148.17 | \$ | 148.57 | \$ | 296.74 | \$ | - | \$ | 0.83 | \$ | 0.83 | 0.28\% |
| 2000 | \$ | 198.32 | \$ | 199.50 | \$ | 397.82 | \$ | 198.32 | \$ | 200.61 | \$ | 398.93 | \$ | - | \$ | 1.11 | \$ | 1.11 | 0.28\% |
| 2500 | \$ | 248.47 | \$ | 251.26 | \$ | 499.73 | \$ | 248.47 | \$ | 252.64 | \$ | 501.11 | \$ | - | \$ | 1.38 | \$ | 1.38 | 0.28\% |
| 3000 | \$ | 298.62 | \$ | 303.02 | \$ | 601.64 | \$ | 298.62 | \$ | 304.68 | \$ | 603.30 | \$ | - | \$ | 1.66 | \$ | 1.66 | 0.28\% |
| 3500 | \$ | 348.77 | \$ | 354.79 | \$ | 703.56 | \$ | 348.77 | \$ | 356.72 | \$ | 705.49 | \$ | - | \$ | 1.93 | \$ | 1.93 | 0.27\% |
| 4000 | \$ | 398.92 | \$ | 406.55 | \$ | 805.47 | \$ | 398.92 | \$ | 408.76 | \$ | 807.68 | \$ | - | \$ | 2.21 | \$ | 2.21 | 0.27\% |

Annual Average
Present Rates
vs.
Proposed Rates

| Monthly <br> Usage <br> (kWh) | Present Delivery |  | Present Supply+T |  | Present Total |  | New Delivery |  | New Supply+T |  | New <br> Total |  | Difference |  |  |  | Total |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Delivery | Supply+T |  | Difference |  |  |  |  |  |  |
|  |  | (\$) |  |  |  | (\$) |  |  |  | (\$) |  | (\$) |  | \$) |  | \$) |  |  |  |  |  |  | (\%) |
| 0 | \$ | 5.77 | \$ | - |  |  | \$ | 5.77 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | - | \$ | - | \$ | - | 0.00\% |
| 25 | \$ | 7.92 | \$ | 2.52 | \$ | 10.44 | \$ | 7.92 | \$ | 2.53 | \$ | 10.45 | \$ | - | \$ | 0.01 | \$ | 0.01 | 0.10\% |
| 50 | \$ | 10.06 | \$ | 5.04 | \$ | 15.10 | \$ | 10.06 | \$ | 5.07 | \$ | 15.13 | \$ | - | \$ | 0.03 | \$ | 0.03 | 0.20\% |
| 75 | \$ | 12.21 | \$ | 7.56 | \$ | 19.77 | \$ | 12.21 | \$ | 7.60 | \$ | 19.81 | \$ | - | \$ | 0.04 | \$ | 0.04 | 0.20\% |
| 100 | \$ | 14.36 | \$ | 10.08 | \$ | 24.44 | \$ | 14.36 | \$ | 10.13 | \$ | 24.49 | \$ | - | \$ | 0.05 | \$ | 0.05 | 0.20\% |
| 150 | \$ | 18.65 | \$ | 15.11 | \$ | 33.76 | \$ | 18.65 | \$ | 15.19 | \$ | 33.84 | \$ | - | \$ | 0.08 | \$ | 0.08 | 0.24\% |
| 200 | \$ | 22.94 | \$ | 20.14 | \$ | 43.08 | \$ | 22.94 | \$ | 20.25 | \$ | 43.19 | \$ | - | \$ | 0.11 | \$ | 0.11 | 0.26\% |
| 250 | \$ | 27.23 | \$ | 25.18 | \$ | 52.41 | \$ | 27.23 | \$ | 25.32 | \$ | 52.55 | \$ | - | \$ | 0.14 | \$ | 0.14 | 0.27\% |
| 300 | \$ | 31.53 | \$ | 30.22 | \$ | 61.75 | \$ | 31.53 | \$ | 30.38 | \$ | 61.91 | \$ | - | \$ | 0.16 | \$ | 0.16 | 0.26\% |
| 350 | \$ | 35.82 | \$ | 35.26 | \$ | 71.08 | \$ | 35.82 | \$ | 35.45 | \$ | 71.27 | \$ | - | \$ | 0.19 | \$ | 0.19 | 0.27\% |
| 400 | \$ | 40.11 | \$ | 40.29 | \$ | 80.40 | \$ | 40.11 | \$ | 40.51 | \$ | 80.62 | \$ | - | \$ | 0.22 | \$ | 0.22 | 0.27\% |
| 450 | \$ | 44.40 | \$ | 45.33 | \$ | 89.73 | \$ | 44.40 | \$ | 45.58 | \$ | 89.98 | \$ | - | \$ | 0.25 | \$ | 0.25 | 0.28\% |
| 500 | \$ | 48.70 | \$ | 50.36 | \$ | 99.06 | \$ | 48.70 | \$ | 50.64 | \$ | 99.34 | \$ | - | \$ | 0.28 | \$ | 0.28 | 0.28\% |
| 600 | \$ | 57.28 | \$ | 60.44 | \$ | 117.72 | \$ | 57.28 | \$ | 60.77 | \$ | 118.05 | \$ | - | \$ | 0.33 | \$ | 0.33 | 0.28\% |
| 679 | \$ | 64.07 | \$ | 68.39 | \$ | 132.46 | \$ | 64.07 | \$ | 68.77 | \$ | 132.84 | \$ | - | \$ | 0.38 | \$ | 0.38 | 0.29\% |
| 700 | \$ | 65.87 | \$ | 70.51 | \$ | 136.38 | \$ | 65.87 | \$ | 70.90 | \$ | 136.77 | \$ | - | \$ | 0.39 | \$ | 0.39 | 0.29\% |
| 750 | \$ | 70.16 | \$ | 75.55 | \$ | 145.71 | \$ | 70.16 | \$ | 75.96 | \$ | 146.12 | \$ | - | \$ | 0.41 | \$ | 0.41 | 0.28\% |
| 800 | \$ | 74.63 | \$ | 80.75 | \$ | 155.38 | \$ | 74.63 | \$ | 81.19 | \$ | 155.82 | \$ | - | \$ | 0.44 | \$ | 0.44 | 0.28\% |
| 900 | \$ | 83.58 | \$ | 91.16 | \$ | 174.74 | \$ | 83.58 | \$ | 91.65 | \$ | 175.23 | \$ | - | \$ | 0.49 | \$ | 0.49 | 0.28\% |
| 1000 | \$ | 92.52 | \$ | 101.57 | \$ | 194.09 | \$ | 92.52 | \$ | 102.12 | \$ | 194.64 | \$ | - | \$ | 0.55 | \$ | 0.55 | 0.28\% |
| 1200 | \$ | 110.41 | \$ | 122.38 | \$ | 232.79 | \$ | 110.41 | \$ | 123.04 | \$ | 233.45 | \$ | - | \$ | 0.66 | \$ | 0.66 | 0.28\% |
| 1500 | \$ | 137.24 | \$ | 153.61 | \$ | 290.85 | \$ | 137.24 | \$ | 154.44 | \$ | 291.68 | \$ | - | \$ | 0.83 | \$ | 0.83 | 0.29\% |
| 2000 | \$ | 181.96 | \$ | 205.65 | \$ | 387.61 | \$ | 181.96 | \$ | 206.75 | \$ | 388.71 | \$ | - | \$ | 1.10 | \$ | 1.10 | 0.28\% |
| 2500 | \$ | 226.68 | \$ | 257.69 | \$ | 484.37 | \$ | 226.68 | \$ | 259.07 | \$ | 485.75 | \$ | - | \$ | 1.38 | \$ | 1.38 | 0.28\% |
| 3000 | \$ | 271.40 | \$ | 309.73 | \$ | 581.13 | \$ | 271.40 | \$ | 311.38 | \$ | 582.78 | \$ | - | \$ | 1.65 | \$ | 1.65 | 0.28\% |
| 3500 | \$ | 316.12 | \$ | 361.77 | \$ | 677.89 | \$ | 316.12 | \$ | 363.70 | \$ | 679.82 | \$ | - | \$ | 1.93 | \$ | 1.93 | 0.28\% |
| 4000 | \$ | 360.83 | \$ | 413.81 | \$ | 774.64 | \$ | 360.83 | \$ | 416.01 | \$ | 776.84 | \$ | - | \$ | 2.20 | \$ | 2.20 | 0.28\% |



## ATLANTIC CITY ELECTRIC COMPANY

MONTHLY GENERAL SERVICE SECONDARY ("MGS Secondary")
4 SUMMER MONTHS (June Through September)


Present Rates
vs.


ATLANTIC CITY ELECTRIC COMPANY
LY GENERAL SERVICE PRIMARY ("MGS P
$\frac{\text { MONTHLY GENERAL SERVICE PRIMARY ("MGS Primary") }}{8 \text { WINTER MONTHS (October Through May) }}$
8 WINTER MONTHS (October Through May)


ATLANTIC CITY ELECTRIC COMPANY
$\frac{\text { MONTHLY GENERAL SERVICE PRIMARY ("MGS Primary") }}{4 \text { SUMMER MONTHS (June Through September) }}$
Present Rates

| vs. Proposed Rates |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Demand | Load <br> Factor | Energy |  |  | Present Distribution |  | PresentBGS and Other Charges |  | Present Total |  | New Distribution |  | BGS and Other Charges |  |  | New <br> Total | Difference Distribution |  | Difference BGS and Other Charges |  | Total Difference |  | Total Difference |
| (kW) | (\%) | (kWh) | Dist kW | Trans kW |  | (\$) |  | (\$) |  |  |  | (\$) |  |  |  | (\$) |  | (\$) |  | (\$) |  | (\$) | (\%) |
| 5 | 20 | 730 | 5.00 | 2 | \$ | 55.03 | \$ | 76.21 | \$ | 131.24 | \$ | 55.03 | \$ | 76.61 | \$ | 131.64 | \$ | - | \$ | 0.40 | \$ | 0.40 | 0.3\% |
| 5 | 30 | 1,095 | 5.00 | 2 | \$ | 71.25 | \$ | 111.80 | \$ | 183.05 | \$ | 71.25 | \$ | 112.41 | \$ | 183.65 | \$ | - | \$ | 0.60 | \$ | 0.60 | 0.3\% |
| 5 | 40 | 1,460 | 5.00 | 2 | \$ | 87.46 | \$ | 147.39 | \$ | 234.86 | \$ | 87.46 | \$ | 148.20 | \$ | 235.67 | \$ | - | \$ | 0.81 | \$ | 0.81 | 0.3\% |
| 5 | 50 | 1,825 | 5.00 | 2 | \$ | 103.68 | \$ | 182.99 | \$ | 286.67 | \$ | 103.68 | \$ | 184.00 | \$ | 287.68 | \$ | - | \$ | 1.01 | \$ | 1.01 | 0.4\% |
| 5 | 60 | 2,190 | 5.00 | 2 | \$ | 119.90 | \$ | 218.58 | \$ | 338.48 | \$ | 119.90 | \$ | 219.79 | \$ | 339.69 | \$ |  | \$ | 1.21 | \$ | 1.21 | 0.4\% |
| 5 | 70 | 2,555 | 5.00 | 2 | \$ | 136.11 | \$ | 254.18 | \$ | 390.29 | \$ | 136.11 | \$ | 255.59 | \$ | 391.70 | \$ | - | \$ | 1.41 | \$ | 1.41 | 0.4\% |
| 5 | 80 | 2,920 | 5.00 | 2 | \$ | 152.33 | \$ | 289.77 | \$ | 442.10 | \$ | 152.33 | \$ | 291.38 | \$ | 443.71 | \$ | - | \$ | 1.61 | \$ | 1.61 | 0.4\% |
| 10 | 20 | 1,460 | 10.00 | 7 | \$ | 95.36 | \$ | 159.94 | \$ | 255.31 | \$ | 95.36 | \$ | 160.75 | \$ | 256.12 | \$ | - | \$ | 0.81 | \$ | 0.81 | 0.3\% |
| 10 | 30 | 2,190 | 10.00 | 7 | \$ | 127.80 | \$ | 231.13 | \$ | 358.93 | \$ | 127.80 | \$ | 232.34 | \$ | 360.14 | \$ | - | \$ | 1.21 | \$ | 1.21 | 0.3\% |
| 10 | 40 | 2,920 | 10.00 | 7 | \$ | 160.23 | \$ | 302.32 | \$ | 462.55 | \$ | 160.23 | \$ | 303.93 | \$ | 464.16 | \$ | - | \$ | 1.61 | \$ | 1.61 | 0.3\% |
| 10 | 50 | 3,650 | 10.00 | 7 | \$ | 192.66 | \$ | 373.51 | \$ | 566.17 | \$ | 192.66 | \$ | 375.52 | \$ | 568.18 | \$ | - | \$ | 2.01 | \$ | 2.01 | 0.4\% |
| 10 | 60 | 4,380 | 10.00 | 7 | \$ | 225.09 | \$ | 444.69 | \$ | 669.79 | \$ | 225.09 | \$ | 447.11 | \$ | 672.21 | \$ | - | \$ | 2.42 | \$ | 2.42 | 0.4\% |
| 10 | 70 | 5,110 | 10.00 | 7 | \$ | 257.53 | \$ | 515.88 | \$ | 773.41 | \$ | 257.53 | \$ | 518.70 | \$ | 776.23 | \$ | - | \$ | 2.82 | \$ | 2.82 | 0.4\% |
| 10 | 80 | 5,840 | 10.00 | 7 | \$ | 289.96 | \$ | 587.07 | \$ | 877.03 | \$ | 289.96 | \$ | 590.29 | \$ | 880.25 | \$ | - | \$ | 3.22 | \$ | 3.22 | 0.4\% |
| 20 | 20 | 2,920 | 20.00 | 17 | \$ | 176.03 | \$ | 327.42 | \$ | 503.45 | \$ | 176.03 | \$ | 329.03 | \$ | 505.06 | \$ |  | \$ | 1.61 | \$ | 1.61 | 0.3\% |
| 20 | 30 | 4,380 | 20.00 | 17 | \$ | 240.89 | \$ | 469.79 | \$ | 710.69 | \$ | 240.89 | \$ | 472.21 | \$ | 713.11 | \$ | - | \$ | 2.42 | \$ | 2.42 | 0.3\% |
| 20 | 40 | 5,840 | 20.00 | 17 | \$ | 305.76 | \$ | 612.17 | \$ | 917.93 | \$ | 305.76 | \$ | 615.39 | \$ | 921.15 | \$ | - | \$ | 3.22 | \$ | 3.22 | 0.4\% |
| 20 | 50 | 7,300 | 20.00 | 17 | \$ | 370.62 | \$ | 754.54 | \$ | 1,125.17 | \$ | 370.62 | \$ | 758.57 | \$ | 1,129.20 | \$ | - | \$ | 4.03 | \$ | 4.03 | 0.4\% |
| 20 | 60 | 8,760 | 20.00 | 17 | \$ | 435.49 | \$ | 896.92 | \$ | 1,332.41 | \$ | 435.49 | \$ | 901.75 | \$ | 1,337.24 | \$ | - | \$ | 4.84 | \$ | 4.84 | 0.4\% |
| 20 | 70 | 10,220 | 20.00 | 17 | \$ | 500.35 | \$ | 1,039.29 | \$ | 1,539.65 | \$ | 500.35 | \$ | 1,044.94 | \$ | 1,545.29 | \$ | - | \$ | 5.64 | \$ | 5.64 | 0.4\% |
| 20 | 80 | 11,680 | 20.00 | 17 | \$ | 565.22 | \$ | 1,181.67 | \$ | 1,746.89 | \$ | 565.22 | \$ | 1,188.12 | \$ | 1,753.33 | \$ | - | \$ | 6.45 | \$ | 6.45 | 0.4\% |
| 30 | 20 | 4,380 | 30.00 | 27 | \$ | 256.69 | \$ | 494.89 | \$ | 751.59 | \$ | 256.69 | \$ | 497.31 | \$ | 754.01 | \$ | - | \$ | 2.42 | \$ | 2.42 | 0.3\% |
| 30 | 30 | 6,570 | 30.00 | 27 | \$ | 353.99 | \$ | 708.46 | \$ | 1,062.45 | \$ | 353.99 | \$ | 712.08 | \$ | 1,066.08 | \$ | - | \$ | 3.63 | \$ | 3.63 | 0.3\% |
| 30 | 40 | 8,760 | 30.00 | 27 | \$ | 451.29 | \$ | 922.02 | \$ | 1,373.31 | \$ | 451.29 | \$ | 926.85 | \$ | 1,378.14 | \$ | - | \$ | 4.84 | \$ | 4.84 | 0.4\% |
| 30 | 50 | 10,950 | 30.00 | 27 | \$ | 548.59 | \$ | 1,135.58 | \$ | 1,684.17 | \$ | 548.59 | \$ | 1,141.63 | \$ | 1,690.21 | \$ |  | \$ | 6.04 | \$ | 6.04 | 0.4\% |
| 30 | 60 | 13,140 | 30.00 | 27 | \$ | 645.88 | \$ | 1,349.14 | \$ | 1,995.03 | \$ | 645.88 | \$ | 1,356.40 | \$ | 2,002.28 | \$ | - | \$ | 7.25 | \$ | 7.25 | 0.4\% |
| 30 | 70 | 15,330 | 30.00 | 27 | \$ | 743.18 |  | 1,562.71 | \$ | 2,305.89 | \$ | 743.18 | \$ | 1,571.17 | \$ | 2,314.35 | \$ | - | \$ | 8.46 | \$ | 8.46 | 0.4\% |
| 30 | 80 | 17,520 | 30.00 | 27 | \$ | 840.48 | \$ | 1,776.27 | \$ | 2,616.75 | \$ | 840.48 | \$ | 1,785.94 | \$ | 2,626.42 | \$ |  | \$ | 9.67 | \$ | 9.67 | 0.4\% |
| 50 | 20 | 7,300 | 50.00 | 47 | \$ | 418.02 | \$ | 829.84 | \$ | 1,247.87 | \$ | 418.02 | \$ | 833.87 | \$ | 1,251.90 | \$ | - | \$ | 4.03 | \$ | 4.03 | 0.3\% |
| 50 | 30 | 10,950 | 50.00 | 47 | \$ | 580.19 | \$ | 1,185.78 | \$ | 1,765.97 | \$ | 580.19 | \$ | 1,191.83 | \$ | 1,772.01 | \$ | - | \$ | 6.04 | \$ | 6.04 | 0.3\% |
| 50 | 40 | 14,600 | 50.00 | 47 | \$ | 742.35 | \$ | 1,541.72 | \$ | 2,284.07 | \$ | 742.35 | \$ | 1,549.78 | \$ | 2,292.13 | \$ | - | \$ | 8.06 | \$ | 8.06 | 0.4\% |
| 50 | 50 | 18,250 | 50.00 | 47 | \$ | 904.51 | \$ | 1,897.66 | \$ | 2,802.17 | \$ | 904.51 | \$ | 1,907.73 | \$ | 2,812.24 | \$ | - | \$ | 10.07 | \$ | 10.07 | 0.4\% |
| 50 | 60 | 21,900 | 50.00 | 47 | \$ | 1,066.67 | \$ | 2,253.59 | \$ | 3,320.27 | \$ | 1,066.67 | \$ | 2,265.68 | \$ | 3,332.35 | \$ | - | \$ | 12.09 | \$ | 12.09 | 0.4\% |
| 50 | 70 | 25,550 | 50.00 | 47 | \$ | 1,228.84 | \$ | 2,609.53 | \$ | 3,838.36 | \$ | 1,228.84 | \$ | 2,623.63 | \$ | 3,852.47 | \$ | - | \$ | 14.10 | \$ | 14.10 | 0.4\% |
| 50 | 80 | 29,200 | 50.00 | 47 | \$ | 1,391.00 | \$ | 2,965.47 | \$ | 4,356.46 | \$ | 1,391.00 | \$ | 2,981.58 | \$ | 4,372.58 | \$ | - | \$ | 16.12 | \$ | 16.12 | 0.4\% |
| 75 | 30 | 16,425 | 75.00 | 72 | \$ | 862.93 | \$ | 1,782.44 | \$ | 2,645.37 | \$ | 862.93 | \$ | 1,791.50 | \$ | 2,654.43 | \$ | - | \$ | 9.07 | \$ | 9.07 | 0.3\% |
| 75 | 40 | 21,900 | 75.00 | 72 |  | 1,106.17 | \$ | 2,316.34 | \$ | 3,422.52 | \$ | 1,106.17 | \$ | 2,328.43 | \$ | 3,434.60 | \$ | - | \$ | 12.09 | \$ | 12.09 | 0.4\% |
| 75 | 50 | 27,375 | 75.00 | 72 | \$ | 1,349.42 | \$ | 2,850.25 | \$ | 4,199.66 | \$ | 1,349.42 | \$ | 2,865.36 | \$ | 4,214.78 | \$ | - | \$ | 15.11 | \$ | 15.11 | 0.4\% |
| 75 | 60 | 32,850 | 75.00 | 72 | \$ | 1,592.66 | \$ | 3,384.15 | - | 4,976.81 | \$ | 1,592.66 |  | 3,402.29 | \$ | 4,994.95 | \$ | - | \$ | 18.13 | \$ | 18.13 | 0.4\% |
| 75 | 70 | 38,325 | 75.00 | 72 | - | 1,835.90 | \$ | 3,918.06 | \$ | 5,753.96 | \$ | 1,835.90 | S | 3,939.21 | \$ | 5,775.12 | \$ | - | \$ | 21.16 | \$ | 21.16 | 0.4\% |
| 75 | 80 | 43,800 | 75.00 | 72 | + | 2,079.15 | \$ | 4,451.96 | - | 6,531.11 | \$ | 2,079.15 |  | 4,476.14 | \$ | 6,555.29 | \$ | - | \$ | 24.18 | \$ | 24.18 | 0.4\% |
| 75 | 90 | 49,275 | 75.00 | 72 | \$ | 2,322.39 | \$ | 4,985.87 | \$ | 7,308.26 | \$ | 2,322.39 | \$ | 5,013.07 | \$ | 7,335.46 | \$ | - | \$ | 27.20 | \$ | 27.20 | 0.4\% |
| 100 | 30 | 21,900 | 100.00 | 97 | \$ | 1,145.67 | \$ | 2,379.09 | \$ | 3,524.77 | \$ | 1,145.67 | \$ | 2,391.18 | \$ | 3,536.85 | \$ | - | \$ | 12.09 | \$ | 12.09 | 0.3\% |
| 100 | 40 | 29,200 | 100.00 | 97 | \$ | 1,470.00 | \$ | 3,090.97 | \$ | 4,560.96 | \$ | 1,470.00 | \$ | 3,107.08 | \$ | 4,577.08 | \$ | - | \$ | 16.12 | \$ | 16.12 | 0.4\% |
| 100 | 50 | 36,500 | 100.00 | 97 | \$ | 1,794.32 | \$ | 3,802.84 | \$ | 5,597.16 | \$ | 1,794.32 | \$ | 3,822.99 | \$ | 5,617.31 | \$ | - | \$ | 20.15 | \$ | 20.15 | 0.4\% |
| 100 | 60 | 43,800 | 100.00 | 97 | \$ | 2,118.65 | \$ | 4,514.71 | \$ | 6,633.36 | \$ | 2,118.65 | \$ | 4,538.89 | \$ | 6,657.54 | \$ | - | \$ | 24.18 | \$ | 24.18 | 0.4\% |
| 100 | 70 | 51,100 | 100.00 | 97 | \$ | 2,442.97 | \$ | 5,226.59 | S | 7,669.56 | \$ | 2,442.97 | \$ | 5,254.80 | \$ | 7,697.77 | \$ | - | \$ | 28.21 | \$ | 28.21 | 0.4\% |
| 100 | 80 | 58,400 | 100.00 | 97 |  | 2,767.30 | \$ | 5,938.46 | \$ | 8,705.76 | \$ | 2,767.30 | \$ | 5,970.70 | \$ | 8,737.99 | \$ | - | \$ | 32.24 | \$ | 32.24 | 0.4\% |
| 100 | 90 | 65,700 | 100.00 | 97 | \$ | 3,091.62 |  | 6,650.34 | \$ | 9,741.96 | \$ | 3,091.62 |  | 6,686.60 | \$ | 9,778.22 | \$ | - | \$ | 36.27 | \$ | 36.27 | 0.4\% |
| 200 | 30 | 43,800 | 200.00 | 197 | \$ | 2,276.65 | \$ | 4,765.71 | \$ | 7,042.36 | \$ | 2,276.65 | \$ | 4,789.89 | \$ | 7,066.54 | \$ | - | \$ | 24.18 | \$ | 24.18 | 0.3\% |
| 200 | 40 | 58,400 | 200.00 | 197 | \$ | 2,925.30 | \$ | 6,189.46 | \$ | 9,114.76 | \$ | 2,925.30 | \$ | 6,221.70 | \$ | 9,146.99 | \$ | - | \$ | 32.24 | \$ | 32.24 | 0.4\% |
| 200 | 50 | 73,000 | 200.00 | 197 | \$ | 3,573.94 | \$ | 7,613.21 | \$ | 11,187.16 | \$ | 3,573.94 | \$ | 7,653.51 | \$ | 11,227.45 | \$ | - | \$ | 40.30 | \$ | 40.30 | 0.4\% |
| 200 | 60 | 87,600 | 200.00 | 197 | \$ | 4,222.59 | \$ | 9,036.96 | \$ | 13,259.55 | \$ | 4,222.59 | \$ | 9,085.31 | \$ | 13,307.91 | \$ | - | \$ | 48.36 | \$ | 48.36 | 0.4\% |
| 200 | 70 | 102,200 | 200.00 | 197 | \$ | 4,871.24 | \$ | 10,460.71 | \$ | 15,331.95 | \$ | 4,871.24 | \$ | 10,517.12 | \$ | 15,388.36 | \$ | - | \$ | 56.41 | \$ | 56.41 | 0.4\% |
| 200 | 80 | 116,800 | 200.00 | 197 | \$ | 5,519.89 | \$ | 11,884.46 | \$ | 17,404.35 | \$ | 5,519.89 | \$ | 11,948.93 | \$ | 17,468.82 | \$ | - | \$ | 64.47 | \$ | 64.47 | 0.4\% |
| 200 | 90 | 131,400 | 200.00 | 197 | \$ | 6,168.54 | \$ | 13,308.20 | \$ | 19,476.74 | \$ | 6,168.54 | \$ | 13,380.74 | \$ | 19,549.28 | \$ | - | \$ | 72.53 | \$ | 72.53 | 0.4\% |

ATLANTIC CITY ELECTRIC COMPANY
MONTHLY GENERAL SERVICE PRIMARY ("MGS Primary")
Annual Average Annual Average
Present Rates

| Present Rates vs. <br> Proposed Rates |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Demand | Load <br> Factor | Energy |  |  | Present Distribution |  | PresentBGS and Other Charges |  | Present Total |  | New Distribution |  | New <br> BGS and Other Charges |  |  | New <br> Total | Difference |  | Difference BGS and Other Charges |  | Total Difference |  | Total Difference |
| (kW) | (\%) | (kWh) | Dist kW | Trans kW |  | (\$) |  |  |  | (\$) |  | (\$) |  |  |  | (\$) |  |  |  |  |  | (\$) | (\%) |
| 5 | 20 | 730 | 5.00 | 2 | \$ | 53.25 | \$ | 73.37 | \$ | 126.62 | \$ | 53.25 | \$ | 73.77 | \$ | 127.02 | \$ | - | \$ | 0.40 | \$ | 0.40 | 0.3\% |
| 5 | 30 | 1,095 | 5.00 | 2 | \$ | 69.15 | \$ | 107.78 | \$ | 176.93 | \$ | 69.15 | \$ | 108.38 | \$ | 177.54 | \$ | - | \$ | 0.60 | \$ | 0.60 | 0.3\% |
| 5 | 40 | 1,460 | 5.00 | 2 | \$ | 85.06 | \$ | 142.19 | \$ | 227.25 | \$ | 85.06 | \$ | 142.99 | \$ | 228.05 | \$ | - | \$ | 0.81 | \$ | 0.81 | 0.4\% |
| 5 | 50 | 1,825 | 5.00 | 2 | \$ | 100.97 | \$ | 176.60 | \$ | 277.56 | \$ | 100.97 | \$ | 177.60 | \$ | 278.57 | \$ | - | \$ | 1.01 | \$ | 1.01 | 0.4\% |
| 5 | 60 | 2,190 | 5.00 | 2 | \$ | 116.87 |  | 211.00 | \$ | 327.88 | \$ | 116.87 | \$ | 212.21 | \$ | 329.08 | \$ | - | \$ | 1.21 | \$ | 1.21 | 0.4\% |
| 5 | 70 | 2,555 | 5.00 | 2 | \$ | 132.78 | \$ | 245.41 | \$ | 378.19 | \$ | 132.78 | \$ | 246.82 | \$ | 379.60 | \$ | - | \$ | 1.41 | \$ | 1.41 | 0.4\% |
| 5 | 80 | 2,920 | 5.00 | 2 | \$ | 148.68 | \$ | 279.82 | \$ | 428.51 | \$ | 148.68 | \$ | 281.43 | \$ | 430.12 | \$ | - | \$ | 1.61 | \$ | 1.61 | 0.4\% |
| 10 | 20 | 1,460 | 10.00 | 7 | \$ | 91.79 | \$ | 153.57 | \$ | 245.36 | \$ | 91.79 | \$ | 154.38 | \$ | 246.17 | \$ | - | \$ | 0.81 | \$ | 0.81 | 0.3\% |
| 10 | 30 | 2,190 | 10.00 | 7 | \$ | 123.61 | \$ | 222.39 | \$ | 345.99 | \$ | 123.61 | \$ | 223.60 | \$ | 347.20 | \$ | - | \$ | 1.21 | \$ | 1.21 | 0.3\% |
| 10 | 40 | 2,920 | 10.00 | 7 | \$ | 155.42 |  | 291.20 | \$ | 446.62 | \$ | 155.42 | \$ | 292.82 | \$ | 448.23 | \$ | - | \$ | 1.61 | \$ | 1.61 | 0.4\% |
| 10 | 50 | 3,650 | 10.00 | 7 | \$ | 187.23 | \$ | 360.02 | \$ | 547.25 | \$ | 187.23 | \$ | 362.04 | \$ | 549.27 | \$ | - | \$ | 2.01 | \$ | 2.01 | 0.4\% |
| 10 | 60 | 4,380 | 10.00 | 7 | \$ | 219.04 | \$ | 428.84 | \$ | 647.88 | \$ | 219.04 | \$ | 431.26 | \$ | 650.30 | \$ | - | \$ | 2.42 | \$ | 2.42 | 0.4\% |
| 10 | 70 | 5,110 | 10.00 | 7 | \$ | 250.86 | \$ | 497.65 | \$ | 748.51 | \$ | 250.86 | \$ | 500.48 | \$ | 751.33 | \$ | - | \$ | 2.82 | \$ | 2.82 | 0.4\% |
| 10 | 80 | 5,840 | 10.00 | 7 | \$ | 282.67 | \$ | 566.47 | \$ | 849.14 | \$ | 282.67 | \$ | 569.70 | \$ | 852.37 | \$ | - | \$ | 3.22 | \$ | 3.22 | 0.4\% |
| 20 | 20 | 2,920 | 20.00 | 17 | \$ | 168.88 | \$ | 313.97 | \$ | 482.86 | \$ | 168.88 | \$ | 315.58 | \$ | 484.47 | \$ | - | \$ | 1.61 | \$ | 1.61 | 0.3\% |
| 20 | 30 | 4,380 | 20.00 | 17 | \$ | 232.51 | \$ | 451.60 | \$ | 684.12 | \$ | 232.51 | \$ | 454.02 | \$ | 686.53 | \$ | - | \$ | 2.42 | \$ | 2.42 | 0.4\% |
| 20 | 40 | 5,840 | 20.00 | 17 | \$ | 296.14 | \$ | 589.24 | \$ | 885.37 | \$ | 296.14 | \$ | 592.46 | \$ | 888.60 | \$ | - | \$ | 3.22 | \$ | 3.22 | 0.4\% |
| 20 | 50 | 7,300 | 20.00 | 17 | \$ | 359.76 | \$ | 726.87 | \$ | 1,086.63 | \$ | 359.76 | \$ | 730.90 | \$ | 1,090.66 | \$ | - | \$ | 4.03 | \$ | 4.03 | 0.4\% |
| 20 | 60 | 8,760 | 20.00 | 17 | \$ | 423.39 | \$ | 864.51 | \$ | 1,287.89 | \$ | 423.39 | \$ | 869.34 | \$ | 1,292.73 | \$ | - | \$ | 4.84 | \$ | 4.84 | 0.4\% |
| 20 | 70 | 10,220 | 20.00 | 17 | \$ | 487.01 | \$ | 1,002.14 | \$ | 1,489.15 | \$ | 487.01 | \$ | 1,007.78 | \$ | 1,494.79 | \$ | - | \$ | 5.64 | \$ | 5.64 | 0.4\% |
| 20 | 80 | 11,680 | 20.00 | 17 | \$ | 550.64 | \$ | 1,139.77 | \$ | 1,690.41 | \$ | 550.64 | \$ | 1,146.22 | \$ | 1,696.86 | \$ | - | \$ | 6.45 | \$ | 6.45 | 0.4\% |
| 30 | 20 | 4,380 | 30.00 | 27 | \$ | 245.98 | \$ | 474.37 | \$ | 720.35 | \$ | 245.98 | \$ | 476.79 | \$ | 722.77 | \$ | - | \$ | 2.42 | \$ | 2.42 | 0.3\% |
| 30 | 30 | 6,570 | 30.00 | 27 | \$ | 341.42 | \$ | 680.82 | \$ | 1,022.24 | \$ | 341.42 | \$ | 684.45 | \$ | 1,025.86 | \$ | - | \$ | 3.63 | \$ | 3.63 | 0.4\% |
| 30 | 40 | 8,760 | 30.00 | 27 | \$ | 436.85 | \$ | 887.27 | \$ | 1,324.13 | \$ | 436.85 | \$ | 892.11 | \$ | 1,328.96 | \$ | - | \$ | 4.84 | \$ | 4.84 | 0.4\% |
| 30 | 50 | 10,950 | 30.00 | 27 | \$ | 532.29 | \$ | 1,093.72 | \$ | 1,626.02 | \$ | 532.29 | \$ | 1,099.77 | \$ | 1,632.06 | \$ | - | \$ | 6.04 | \$ | 6.04 | 0.4\% |
| 30 | 60 | 13,140 | 30.00 | 27 | \$ | 627.73 | \$ | 1,300.17 | \$ | 1,927.91 | \$ | 627.73 | \$ | 1,307.43 | \$ | 1,935.16 | \$ | - | \$ | 7.25 | \$ | 7.25 | 0.4\% |
| 30 | 70 | 15,330 | 30.00 | 27 | \$ | 723.17 | \$ | 1,506.62 | \$ | 2,229.80 | \$ | 723.17 | \$ | 1,515.09 | \$ | 2,238.26 | \$ | - | \$ | 8.46 | \$ | 8.46 | 0.4\% |
| 30 | 80 | 17,520 | 30.00 | 27 | \$ | 818.61 | \$ | 1,713.07 | \$ | 2,531.68 | \$ | 818.61 | \$ | 1,722.75 | \$ | 2,541.36 | \$ | - | \$ | 9.67 | \$ | 9.67 | 0.4\% |
| 50 | 20 | 7,300 | 50.00 | 47 | \$ | 400.16 | \$ | 795.17 | \$ | 1,195.33 | \$ | 400.16 | \$ | 799.20 | \$ | 1,199.36 | \$ | - | \$ | 4.03 | \$ | 4.03 | 0.3\% |
| 50 | 30 | 10,950 | 50.00 | 47 | \$ | 559.23 | \$ | 1,139.26 | \$ | 1,698.48 | \$ | 559.23 | \$ | 1,145.30 | \$ | 1,704.53 | \$ | - | \$ | 6.04 | \$ | 6.04 | 0.4\% |
| 50 | 40 | 14,600 | 50.00 | 47 | \$ | 718.29 | \$ | 1,483.34 | \$ | 2,201.63 | \$ | 718.29 | \$ | 1,491.40 | \$ | 2,209.69 | \$ | - | \$ | 8.06 | \$ | 8.06 | 0.4\% |
| 50 | 50 | 18,250 | 50.00 | 47 | \$ | 877.36 | \$ | 1,827.42 | \$ | 2,704.78 | \$ | 877.36 | \$ | 1,837.50 | \$ | 2,714.85 | \$ |  | \$ | 10.07 | \$ | 10.07 | 0.4\% |
| 50 | 60 | 21,900 | 50.00 | 47 | \$ | 1,036.42 | \$ | 2,171.51 | \$ | 3,207.93 | \$ | 1,036.42 | \$ | 2,183.60 | \$ | 3,220.02 | \$ | - | \$ | 12.09 | \$ | 12.09 | 0.4\% |
| 50 | 70 | 25,550 | 50.00 | 47 | \$ | 1,195.49 | \$ | 2,515.59 | \$ | 3,711.08 | \$ | 1,195.49 | \$ | 2,529.70 | \$ | 3,725.18 | \$ | - | \$ | 14.10 | \$ | 14.10 | 0.4\% |
| 50 | 80 | 29,200 | 50.00 | 47 | \$ | 1,354.55 | \$ | 2,859.68 | \$ | 4,214.23 | S | 1,354.55 | \$ | 2,875.80 | \$ | 4,230.35 | \$ | - | \$ | 16.12 | \$ | 16.12 | 0.4\% |
| 75 | 30 | 16,425 | 75.00 | 72 | \$ | 831.49 | \$ | 1,712.30 | \$ | 2,543.79 | \$ | 831.49 | \$ | 1,721.37 | \$ | 2,552.86 | \$ | - | \$ | 9.07 | \$ | 9.07 | 0.4\% |
| 75 | 40 | 21,900 | 75.00 | 72 | \$ | 1,070.09 | \$ | 2,228.43 | \$ | 3,298.51 | \$ | 1,070.09 | \$ | 2,240.51 | \$ | 3,310.60 | \$ | - | \$ | 12.09 | \$ | 12.09 | 0.4\% |
| 75 | 50 | 27,375 | 75.00 | 72 | \$ | 1,308.68 | \$ | 2,744.55 | \$ | 4,053.24 | \$ | 1,308.68 | \$ | 2,759.66 | \$ | 4,068.35 | \$ | - | \$ | 15.11 | \$ | 15.11 | 0.4\% |
| 75 | 60 | 32,850 | 75.00 | 72 | \$ | 1,547.28 | \$ | 3,260.68 | \$ | 4,807.96 | \$ | 1,547.28 | \$ | 3,278.81 |  | 4,826.09 | \$ | - | \$ | 18.13 | \$ | 18.13 | 0.4\% |
| 75 | 70 | 38,325 | 75.00 | 72 | \$ | 1,785.88 | \$ | 3,776.80 | \$ | 5,562.68 | \$ | 1,785.88 | \$ | 3,797.96 | \$ | 5,583.84 | \$ | - | \$ | 21.16 | \$ | 21.16 | 0.4\% |
| 75 | 80 | 43,800 | 75.00 | 72 | \$ | 2,024.47 | \$ | 4,292.93 | \$ | 6,317.41 | \$ | 2,024.47 | \$ | 4,317.11 | \$ | 6,341.58 | \$ | - | \$ | 24.18 | \$ | 24.18 | 0.4\% |
| 75 | 90 | 49,275 | 75.00 | 72 | \$ | 2,263.07 | \$ | 4,809.06 | \$ | 7,072.13 | \$ | 2,263.07 | \$ | 4,836.26 | \$ | 7,099.33 | \$ | - | \$ | 27.20 | \$ | 27.20 | 0.4\% |
| 100 | 30 | 21,900 | 100.00 | 97 | \$ | 1,103.75 | \$ | 2,285.34 | \$ | 3,389.10 | \$ | 1,103.75 |  | 2,297.43 | \$ | 3,401.19 | \$ | - | \$ | 12.09 | \$ | 12.09 | 0.4\% |
| 100 | 40 | 29,200 | 100.00 | 97 | \$ | 1,421.88 | \$ | 2,973.51 | \$ | 4,395.39 | \$ | 1,421.88 | \$ | 2,989.63 | \$ | 4,411.51 | \$ | - | \$ | 16.12 | \$ | 16.12 | 0.4\% |
| 100 | 50 | 36,500 | 100.00 | 97 | \$ | 1,740.01 | \$ | 3,661.68 | \$ | 5,401.69 | \$ | 1,740.01 | \$ | 3,681.83 | \$ | 5,421.84 | \$ | - | \$ | 20.15 | \$ | 20.15 | 0.4\% |
| 100 | 60 | 43,800 | 100.00 | 97 | \$ | 2,058.14 | \$ | 4,349.85 | \$ | 6,407.99 | \$ | 2,058.14 | \$ | 4,374.03 | \$ | 6,432.17 | \$ | - | \$ | 24.18 | \$ | 24.18 | 0.4\% |
| 100 | 70 | 51,100 | 100.00 | 97 | \$ | 2,376.27 | \$ | 5,038.02 | \$ | 7,414.29 | \$ | 2,376.27 | \$ | 5,066.22 | \$ | 7,442.49 | \$ | - | \$ | 28.21 | \$ | 28.21 | 0.4\% |
| 100 | 80 | 58,400 | 100.00 | 97 | \$ | 2,694.40 | \$ | 5,726.19 | \$ | 8,420.58 | \$ | 2,694.40 | \$ | 5,758.42 | \$ | 8,452.82 | \$ | - | \$ | 32.24 | \$ | 32.24 | 0.4\% |
| 100 | 90 | 65,700 | 100.00 | 97 | \$ | 3,012.53 | \$ | 6,414.35 | \$ | 9,426.88 | \$ | 3,012.53 | \$ | 6,450.62 | \$ | 9,463.15 | \$ | - | \$ | 36.27 |  | 36.27 | 0.4\% |
| 200 | 30 | 43,800 | 200.00 | 197 | \$ | 2,192.81 | \$ | 4,577.51 | \$ | 6,770.32 | \$ | 2,192.81 | \$ | 4,601.69 | \$ | 6,794.50 | \$ | - | \$ | 24.18 | \$ | 24.18 | 0.4\% |
| 200 | 40 | 58,400 | 200.00 | 197 | \$ | 2,829.07 | \$ | 5,953.85 | \$ | 8,782.92 | \$ | 2,829.07 | \$ | 5,986.09 | \$ | 8,815.16 | \$ | - | \$ | 32.24 | \$ | 32.24 | 0.4\% |
| 200 | 50 | 73,000 | 200.00 | 197 |  | 3,465.32 |  | 7,330.19 | \$ | 10,795.51 | \$ | 3,465.32 | \$ | 7,370.49 | \$ | 10,835.81 | \$ | - | \$ | 40.30 | \$ | 40.30 | 0.4\% |
| 200 | 60 | 87,600 | 200.00 | 197 | \$ | 4,101.58 |  | 8,706.53 | \$ | 12,808.11 | \$ | 4,101.58 |  | 8,754.88 | \$ | 12,856.46 | \$ | - | \$ | 48.36 | \$ | 48.36 | 0.4\% |
| 200 | 70 | 102,200 | 200.00 | 197 | \$ | 4,737.84 | \$ | 10,082.86 | \$ | 14,820.70 | \$ | 4,737.84 | \$ | 10,139.28 | \$ | 14,877.12 |  | - | \$ | 56.41 | \$ | 56.41 | 0.4\% |
| 200 | 80 | 116,800 | 200.00 | 197 |  | 5,374.10 | \$ | 11,459.20 | \$ | 16,833.30 | \$ | 5,374.10 | \$ | 11,523.67 | \$ | 16,897.77 | \$ | - | \$ | 64.47 | \$ | 64.47 | 0.4\% |
| 200 | 90 | 131,400 | 200.00 | 197 | \$ | 6,010.36 | \$ | 12,835.54 | \$ | 18,845.90 | \$ | 6,010.36 | \$ | 12,908.07 | \$ | 18,918.43 | \$ | - |  | 72.53 | \$ | 72.53 | 0.4\% |

ATLANTIC CITY ELECTRIC COMPANY
$\frac{\text { ANNUAL GENERAL SERVICE SECONDARY ("AGS Secondary"' }}{8 \text { WINTER MONTHS (October Through May) }}$

| Present Rates vs. <br> Proposed Rates |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Demand | Load Factor | Energy |  |  | Present Distribution |  | Present <br> BGS and Other Charges |  | Present Total |  | New Distribution |  | New <br> BGS and Other Charges |  | New <br> Total |  | Difference Distribution |  | Difference BGS and Other Charges |  | Total Difference |  | Total Difference |
| (kW) | (\%) | (kWh) | Metered kW | Billed kW |  | (\$) |  | (\$) |  |  |  | (\$) |  | (\$) |  | (\$) |  | (\$) |  | (\$) |  | (\$) | (\%) |
| 25 | 20 | 3,650 | 25 | 25 | \$ | 471.47 | \$ | 448.89 | \$ | 920.36 | \$ | 471.47 | \$ | 450.90 | \$ | 922.37 | \$ | - | \$ | 2.01 | \$ | 2.01 | 0.2\% |
| 25 | 30 | 5,475 | 25 | 25 | \$ | 471.47 | \$ | 630.83 | \$ | 1,102.30 | \$ | 471.47 | \$ | 633.85 | \$ | 1,105.32 | \$ |  | \$ | 3.02 | \$ | 3.02 | 0.3\% |
| 25 | 40 | 7,300 | 25 | 25 | \$ | 471.47 | \$ | 812.77 | \$ | 1,284.24 | \$ | 471.47 | \$ | 816.80 | \$ | 1,288.27 | \$ | - | \$ | 4.03 | \$ | 4.03 | 0.3\% |
| 25 | 50 | 9,125 | 25 | 25 | \$ | 471.47 | \$ | 994.72 | \$ | 1,466.19 | \$ | 471.47 | \$ | 999.75 | \$ | 1,471.22 | \$ | - | \$ | 5.04 | \$ | 5.04 | 0.3\% |
| 25 | 60 | 10,950 | 25 | 25 | \$ | 471.47 | \$ | 1,176.66 | \$ | 1,648.13 | \$ | 471.47 | \$ | 1,182.70 | \$ | 1,654.17 | \$ |  | \$ | 6.04 | \$ | 6.04 | 0.4\% |
| 25 | 70 | 12,775 | 25 | 25 | \$ | 471.47 | \$ | 1,358.60 | \$ | 1,830.07 | \$ | 471.47 | \$ | 1,365.66 | \$ | 1,837.13 | \$ |  | \$ | 7.05 | \$ | 7.05 | 0.4\% |
| 25 | 80 | 14,600 | 25 | 25 | \$ | 471.47 | \$ | 1,540.55 | \$ | 2,012.02 | \$ | 471.47 | S | 1,548.61 | \$ | 2,020.08 | \$ |  | \$ | 8.06 | \$ | 8.06 | 0.4\% |
| 50 | 20 | 7,300 | 50 | 50 | \$ | 749.72 | \$ | 897.77 | \$ | 1,647.49 | \$ | 749.72 | \$ | 901.80 | \$ | 1,651.52 | \$ |  | \$ | 4.03 | \$ | 4.03 | 0.2\% |
| 50 | 30 | 10,950 | 50 | 50 | \$ | 749.72 | \$ | 1,261.66 | \$ | 2,011.38 | \$ | 749.72 | \$ | 1,267.70 | \$ | 2,017.42 | \$ | - | \$ | 6.04 | \$ | 6.04 | 0.3\% |
| 50 | 40 | 14,600 | 50 | 50 | \$ | 749.72 | \$ | 1,625.55 | \$ | 2,375.27 | \$ | 749.72 | \$ | 1,633.61 | \$ | 2,383.33 | \$ | - | \$ | 8.06 | \$ | 8.06 | 0.3\% |
| 50 | 50 | 18,250 | 50 | 50 | \$ | 749.72 | \$ | 1,989.43 | \$ | 2,739.15 | \$ | 749.72 | \$ | 1,999.51 | \$ | 2,749.23 | \$ | - | \$ | 10.07 | \$ | 10.07 | 0.4\% |
| 50 | 60 | 21,900 | 50 | 50 | \$ | 749.72 | \$ | 2,353.32 | \$ | 3,103.04 | \$ | 749.72 | \$ | 2,365.41 | \$ | 3,115.13 | \$ | - | \$ | 12.09 | \$ | 12.09 | 0.4\% |
| 50 | 70 | 25,550 | 50 | 50 | \$ | 749.72 | \$ | 2,717.21 | \$ | 3,466.93 | \$ | 749.72 |  | 2,731.31 | \$ | 3,481.03 | \$ |  | \$ | 14.10 | \$ | 14.10 | 0.4\% |
| 50 | 80 | 29,200 | 50 | 50 | \$ | 749.72 | \$ | 3,081.09 | \$ | 3,830.81 | \$ | 749.72 | S | 3,097.21 | \$ | 3,846.93 | \$ | - | \$ | 16.12 | \$ | 16.12 | 0.4\% |
| 100 | 20 | 14,600 | 100 | 100 | \$ | 1,306.22 | \$ | 1,795.55 | \$ | 3,101.77 | \$ | 1,306.22 | \$ | 1,803.61 | \$ | 3,109.83 | \$ | - | \$ | 8.06 | \$ | 8.06 | 0.3\% |
| 100 | 30 | 21,900 | 100 | 100 | \$ | 1,306.22 | \$ | 2,523.32 | \$ | 3,829.54 | \$ | 1,306.22 | \$ | 2,535.41 | \$ | 3,841.63 | \$ | - | \$ | 12.09 | \$ | 12.09 | 0.3\% |
| 100 | 40 | 29,200 | 100 | 100 | \$ | 1,306.22 | \$ | 3,251.09 | \$ | 4,557.31 | \$ | 1,306.22 | \$ | 3,267.21 | \$ | 4,573.43 | \$ |  | \$ | 16.12 | \$ | 16.12 | 0.4\% |
| 100 | 50 | 36,500 | 100 | 100 | \$ | 1,306.22 | \$ | 3,978.87 | \$ | 5,285.09 | \$ | 1,306.22 | \$ | 3,999.02 | \$ | 5,305.24 | \$ |  | \$ | 20.15 | \$ | 20.15 | 0.4\% |
| 100 | 60 | 43,800 | 100 | 100 | \$ | 1,306.22 | \$ | 4,706.64 | \$ | 6,012.86 | \$ | 1,306.22 | \$ | 4,730.82 | \$ | 6,037.04 | \$ | - | \$ | 24.18 | \$ | 24.18 | 0.4\% |
| 100 | 70 | 51,100 | 100 | 100 | \$ | 1,306.22 | \$ | 5,434.41 | \$ | 6,740.63 | S | 1,306.22 | \$ | 5,462.62 | \$ | 6,768.84 | \$ | - | \$ | 28.21 | \$ | 28.21 | 0.4\% |
| 100 | 80 | 58,400 | 100 | 100 | \$ | 1,306.22 | \$ | 6,162.19 | \$ | 7,468.41 | \$ | 1,306.22 | \$ | 6,194.42 | \$ | 7,500.64 | \$ | - | \$ | 32.24 | \$ | 32.24 | 0.4\% |
| 300 | 20 | 43,800 | 300 | 300 | \$ | 3,532.22 | \$ | 5,386.64 | \$ | 8,918.86 | \$ | 3,532.22 | \$ | 5,410.82 | \$ | 8,943.04 | \$ |  | \$ | 24.18 | \$ | 24.18 | 0.3\% |
| 300 | 30 | 65,700 | 300 | 300 | \$ | 3,532.22 | \$ | 7,569.96 | \$ | 11,102.18 | \$ | 3,532.22 | \$ | 7,606.23 | \$ | 11,138.45 | \$ | - | \$ | 36.27 | \$ | 36.27 | 0.3\% |
| 300 | 40 | 87,600 | 300 | 300 | \$ | 3,532.22 | \$ | 9,753.28 | \$ | 13,285.50 | \$ | 3,532.22 | \$ | 9,801.64 | \$ | 13,333.86 | \$ |  | \$ | 48.36 | \$ | 48.36 | 0.4\% |
| 300 | 50 | 109,500 | 300 | 300 | \$ | 3,532.22 | \$ | 11,936.60 | \$ | 15,468.82 |  | 3,532.22 | \$ | 11,997.05 | \$ | 15,529.27 | \$ | - | \$ | 60.44 | \$ | 60.44 | 0.4\% |
| 300 | 60 | 131,400 | 300 | 300 | \$ | 3,532.22 | \$ | 14,119.92 | \$ | 17,652.14 | \$ | 3,532.22 | \$ | 14,192.46 | \$ | 17,724.68 | \$ | - | \$ | 72.53 | \$ | 72.53 | 0.4\% |
| 300 | 70 | 153,300 | 300 | 300 | \$ | 3,532.22 | \$ | 16,303.24 | \$ | 19,835.46 | \$ | 3,532.22 | \$ | 16,387.87 | \$ | 19,920.09 | \$ |  | \$ | 84.62 | \$ | 84.62 | 0.4\% |
| 300 | 80 | 175,200 | 300 | 300 | \$ | 3,532.22 | \$ | 18,486.56 | \$ | 22,018.78 | \$ | 3,532.22 | \$ | 18,583.27 | \$ | 22,115.49 | \$ | - | \$ | 96.71 | \$ | 96.71 | 0.4\% |
| 500 | 20 | 73,000 | 500 | 500 | \$ | 5,758.22 | \$ | 8,977.74 | \$ | 14,735.96 | \$ | 5,758.22 | \$ | 9,018.03 | \$ | 14,776.25 | \$ | - | \$ | 40.30 | \$ | 40.30 | 0.3\% |
| 500 | 30 | 109,500 | 500 | 500 | \$ | 5,758.22 | \$ | 12,616.60 | \$ | 18,374.82 |  | 5,758.22 | \$ | 12,677.05 | \$ | 18,435.27 | \$ | - | \$ | 60.44 | \$ | 60.44 | 0.3\% |
| 500 | 40 | 146,000 | 500 | 500 | \$ | 5,758.22 | \$ | 16,255.47 | \$ | 22,013.69 | \$ | 5,758.22 | \$ | 16,336.06 | \$ | 22,094.28 | \$ | - | \$ | 80.59 | \$ | 80.59 | 0.4\% |
| 500 | 50 | 182,500 | 500 | 500 | \$ | 5,758.22 | \$ | 19,894.34 | \$ | 25,652.56 | \$ | 5,758.22 | \$ | 19,995.08 | \$ | 25,753.30 | \$ | - | \$ | 100.74 | \$ | 100.74 | 0.4\% |
| 500 | 60 | 219,000 | 500 | 500 | \$ | 5,758.22 | \$ | 23,533.21 | \$ | 29,291.43 | \$ | 5,758.22 | \$ | 23,654.09 | \$ | 29,412.31 | \$ | - | \$ | 120.89 | \$ | 120.89 | 0.4\% |
| 500 | 70 | 255,500 | 500 | 500 | \$ | 5,758.22 | \$ | 27,172.07 | \$ | 32,930.29 | \$ | 5,758.22 | \$ | 27,313.11 | \$ | 33,071.33 | \$ | - | \$ | 141.04 | \$ | 141.04 | 0.4\% |
| 500 | 80 | 292,000 | 500 | 500 | \$ | 5,758.22 | \$ | 30,810.94 | \$ | 36,569.16 | \$ | 5,758.22 | \$ | 30,972.12 | \$ | 36,730.34 | \$ |  | \$ | 161.18 | \$ | 161.18 | 0.4\% |
| 750 | 30 | 164,250 | 750 | 750 | \$ | 8,540.72 | \$ | 18,924.90 | \$ | 27,465.62 | \$ | 8,540.72 | \$ | 19,015.57 | \$ | 27,556.29 | \$ | - | \$ | 90.67 | \$ | 90.67 | 0.3\% |
| 750 | 40 | 219,000 | 750 | 750 | \$ | 8,540.72 | \$ | 24,383.21 | \$ | 32,923.93 | \$ | 8,540.72 | \$ | 24,504.09 | \$ | 33,044.81 | \$ | - | \$ | 120.89 | \$ | 120.89 | 0.4\% |
| 750 | 50 | 273,750 | 750 | 750 | \$ | 8,540.72 | \$ | 29,841.51 | \$ | 38,382.23 | \$ | 8,540.72 | \$ | 29,992.62 | \$ | 38,533.34 | \$ | - | \$ | 151.11 | \$ | 151.11 | 0.4\% |
| 750 | 60 | 328,500 | 750 | 750 | \$ | 8,540.72 | \$ | 35,299.81 | \$ | 43,840.53 | \$ | 8,540.72 | \$ | 35,481.14 | \$ | 44,021.86 | \$ | - | \$ | 181.33 | \$ | 181.33 | 0.4\% |
| 750 | 70 | 383,250 | 750 | 750 | \$ | 8,540.72 | \$ | 40,758.11 | \$ | 49,298.83 | \$ | 8,540.72 | \$ | 40,969.66 | \$ | 49,510.38 | \$ |  | \$ | 211.55 | \$ | 211.55 | 0.4\% |
| 750 | 80 | 438,000 | 750 | 750 | \$ | 8,540.72 | \$ | 46,216.41 | \$ | 54,757.13 | \$ | 8,540.72 | \$ | 46,458.19 | \$ | 54,998.91 | \$ | - | \$ | 241.78 | \$ | 241.78 | 0.4\% |
| 750 | 90 | 492,750 | 750 | 750 | \$ | 8,540.72 | \$ | 51,674.71 | S | 60,215.43 | \$ | 8,540.72 | \$ | 51,946.71 | \$ | 60,487.43 | \$ | - | \$ | 272.00 | S | 272.00 | 0.5\% |
| 1000 | 30 | 219,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 25,233.21 | \$ | 36,556.43 | S | 11,323.22 | \$ | 25,354.09 | \$ | 36,677.31 | \$ | - | \$ | 120.89 | S | 120.89 | 0.3\% |
| 1000 | 40 | 292,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 32,510.94 | \$ | 43,834.16 | \$ | 11,323.22 | \$ | 32,672.12 | \$ | 43,995.34 | \$ | - | \$ | 161.18 | \$ | 161.18 | 0.4\% |
| 1000 | 50 | 365,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 39,788.68 | \$ | 51,111.90 | \$ | 11,323.22 | \$ | 39,990.16 | \$ | 51,313.38 | \$ | - | \$ | 201.48 | \$ | 201.48 | 0.4\% |
| 1000 | 60 | 438,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 47,066.41 | \$ | 58,389.63 | \$ | 11,323.22 | \$ | 47,308.19 | \$ | 58,631.41 | \$ | - | \$ | 241.78 | \$ | 241.78 | 0.4\% |
| 1000 | 70 | 511,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 54,344.15 | \$ | 65,667.37 | \$ | 11,323.22 | \$ | 54,626.22 | \$ | 65,949.44 | \$ | - | \$ | 282.07 | \$ | 282.07 | 0.4\% |
| 1000 | 80 | 584,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 61,621.88 | \$ | 72,945.10 | \$ | 11,323.22 | \$ | 61,944.25 | \$ | 73,267.47 | \$ | - | \$ | 322.37 | \$ | 322.37 | 0.4\% |
| 1000 | 90 | 657,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 68,899.62 | \$ | 80,222.84 | \$ | 11,323.22 | \$ | 69,262.28 | \$ | 80,585.50 | \$ | - | \$ | 362.66 | \$ | 362.66 | 0.5\% |
| 2000 | 30 | 438,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 50,466.41 | \$ | 72,919.63 | \$ | 22,453.22 | \$ | 50,708.19 | \$ | 73,161.41 | \$ | - | \$ | 241.78 | \$ | 241.78 | 0.3\% |
| 2000 | 40 | 584,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 65,021.88 | \$ | 87,475.10 |  | 22,453.22 | \$ | 65,344.25 | \$ | 87,797.47 |  | - | \$ | 322.37 | \$ | 322.37 | 0.4\% |
| 2000 | 50 | 730,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 79,577.35 | \$ | 102,030.57 | \$ | 22,453.22 | \$ | 79,980.31 | \$ | 102,433.53 | \$ | - | \$ | 402.96 | \$ | 402.96 | 0.4\% |
| 2000 | 60 | 876,000 | 2,000 | 2,000 | - | 22,453.22 | \$ | 94,132.82 | \$ | 116,586.04 | \$ | 22,453.22 | \$ | 94,616.37 | \$ | 117,069.59 | \$ | - | \$ | 483.55 | \$ | 483.55 | 0.4\% |
| 2000 | 70 | 1,022,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 108,688.29 | \$ | 131,141.51 | \$ | 22,453.22 | \$ | 109,252.43 | \$ | 131,705.65 | \$ | - | S | 564.14 | \$ | 564.14 | 0.4\% |
| 2000 | 80 | 1,168,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 123,243.76 | \$ | 145,696.98 | \$ | 22,453.22 | \$ | 123,888.50 | \$ | 146,341.72 | \$ | - | \$ | 644.74 | \$ | 644.74 | 0.4\% |
| 2000 | 90 | 1,314,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 137,799.23 | \$ | 160,252.45 | \$ | 22,453.22 | \$ | 138,524.56 | \$ | 160,977.78 | \$ | - | \$ | 725.33 | \$ | 725.33 | 0.5\% |

ATLANTIC CITY ELECTRIC COMPANY
ANNUAL GENERAL SERVICE SECONDARY ("AGS Secondary"'
4 SUMMER MONTHS (June Through September)
resent Rates


ATLANTIC CITY ELECTRIC COMPANY
ANNUAL GENERAL SERVICE SECONDARY ("AGS Secondary"':

## Annual Average

Present Rates
vs.


Present Rates
Load
Factor
Energy
 (\%) $\quad \begin{array}{lll}(\mathrm{kWh}) & \text { Metered } \mathrm{kW} & \text { Billed } \mathrm{kW} \\ 3,650 & 25 & \mathrm{D} \text { Demand } \\ \text { D Energy }\end{array}$

0

 $\qquad$ ${ }^{\text {New }}$
New
stributio
BGS and Othe New
Other C Charges


Difference
Difference Difference
Difference
Charges
Total
Difference
otal $\begin{gathered}\text { Total } \\ \text { Differe }\end{gathered}$ $\frac{\begin{array}{c}\text { Total } \\ \text { Differenc }\end{array}}{(\$)}$ $\frac{\text { Difference }}{(\%)}$
0.1

## ATLANTIC CITY ELECTRIC COMPANY

$\frac{\text { ANNUAL GENERAL SERVICE PRIMARY ("AGS Primary"' }}{4 \text { SUMMER MONTHS (Jupe Through September) }}$
4 SUMMER MONTHS (June Through September)

vs.


## YEAR 3 BILL IMPACTS

| Present Rates vs. Proposed Rates |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Monthly | Present Delivery |  | Present Supply+T |  | Present Total |  | New Delivery |  | New <br> Supply+T |  | New <br> Total |  | Difference |  |  |  | Total |  | (\%) |
| Usage |  |  |  |  |  |  |  | $y+T$ |  |  |  | ence |  |
| (kWh) |  | (\$) |  |  |  | (\$) |  |  |  | (\$) |  |  |  | (\$) |  | \$) |  | (\$) |  |  |  |  |  |  |  |
| 0 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | - | \$ | - | \$ | - | 0.00\% |
| 25 | \$ | 7.87 | \$ | 2.62 | \$ | 10.49 | \$ | 7.87 | \$ | 2.64 | \$ | 10.51 | \$ | - | \$ | 0.02 | \$ | 0.02 | 0.19\% |
| 50 | \$ | 9.97 | \$ | 5.25 | \$ | 15.22 | \$ | 9.97 | \$ | 5.28 | \$ | 15.25 | \$ | - | \$ | 0.03 | \$ | 0.03 | 0.20\% |
| 75 | \$ | 12.07 | \$ | 7.87 | \$ | 19.94 | \$ | 12.07 | \$ | 7.92 | \$ | 19.99 | \$ | - | \$ | 0.05 | \$ | 0.05 | 0.25\% |
| 100 | \$ | 14.17 | \$ | 10.49 | \$ | 24.66 | \$ | 14.17 | \$ | 10.56 | \$ | 24.73 | \$ | - | \$ | 0.07 | \$ | 0.07 | 0.28\% |
| 150 | \$ | 18.37 | \$ | 15.74 | \$ | 34.11 | \$ | 18.37 | \$ | 15.83 | \$ | 34.20 | \$ | - | \$ | 0.09 | \$ | 0.09 | 0.26\% |
| 200 | \$ | 22.57 | \$ | 20.98 | \$ | 43.55 | \$ | 22.57 | \$ | 21.11 | \$ | 43.68 | \$ | - | \$ | 0.13 | \$ | 0.13 | 0.30\% |
| 250 | \$ | 26.77 | \$ | 26.23 | \$ | 53.00 | \$ | 26.77 | \$ | 26.39 | \$ | 53.16 | \$ | - | \$ | 0.16 | \$ | 0.16 | 0.30\% |
| 300 | \$ | 30.97 | \$ | 31.47 | \$ | 62.44 | \$ | 30.97 | \$ | 31.67 | \$ | 62.64 | \$ | - | \$ | 0.20 | \$ | 0.20 | 0.32\% |
| 350 | \$ | 35.17 | \$ | 36.72 | \$ | 71.89 | \$ | 35.17 | \$ | 36.95 | \$ | 72.12 | \$ | - | \$ | 0.23 | \$ | 0.23 | 0.32\% |
| 400 | \$ | 39.37 | \$ | 41.96 | \$ | 81.33 | \$ | 39.37 | \$ | 42.22 | \$ | 81.59 | \$ | - | \$ | 0.26 | \$ | 0.26 | 0.32\% |
| 450 | \$ | 43.57 | \$ | 47.21 | \$ | 90.78 | \$ | 43.57 | \$ | 47.50 | \$ | 91.07 | \$ | - | \$ | 0.29 | \$ | 0.29 | 0.32\% |
| 500 | \$ | 47.77 | \$ | 52.46 | \$ | 100.23 | \$ | 47.77 | \$ | 52.78 | \$ | 100.55 | \$ | - | \$ | 0.32 | \$ | 0.32 | 0.32\% |
| 600 | \$ | 56.17 | \$ | 62.95 | \$ | 119.12 | \$ | 56.17 | \$ | 63.34 | \$ | 119.51 | \$ | - | \$ | 0.39 | \$ | 0.39 | 0.33\% |
| 679 | \$ | 62.81 | \$ | 71.23 | \$ | 134.04 | \$ | 62.81 | \$ | 71.68 | \$ | 134.49 | \$ | - | \$ | 0.45 | \$ | 0.45 | 0.34\% |
| 700 | \$ | 64.57 | \$ | 73.44 | \$ | 138.01 | \$ | 64.57 | \$ | 73.89 | \$ | 138.46 | \$ | - | \$ | 0.45 | \$ | 0.45 | 0.33\% |
| 750 | \$ | 68.77 | \$ | 78.68 | \$ | 147.45 | \$ | 68.77 | \$ | 79.17 | \$ | 147.94 | \$ | - | \$ | 0.49 | \$ | 0.49 | 0.33\% |
| 800 | \$ | 72.97 | \$ | 83.93 | \$ | 156.90 | \$ | 72.97 | \$ | 84.45 | \$ | 157.42 | \$ | - | \$ | 0.52 | \$ | 0.52 | 0.33\% |
| 900 | \$ | 81.38 | \$ | 94.42 | \$ | 175.80 | \$ | 81.38 | \$ | 95.01 | \$ | 176.39 | \$ | - | \$ | 0.59 | \$ | 0.59 | 0.34\% |
| 1000 | \$ | 89.78 | \$ | 104.91 | \$ | 194.69 | \$ | 89.78 | \$ | 105.56 | \$ | 195.34 | \$ | - | \$ | 0.65 | \$ | 0.65 | 0.33\% |
| 1200 | \$ | 106.58 | \$ | 125.89 | \$ | 232.47 | \$ | 106.58 | \$ | 126.67 | \$ | 233.25 | \$ | - | \$ | 0.78 | \$ | 0.78 | 0.34\% |
| 1500 | \$ | 131.78 | \$ | 157.37 | \$ | 289.15 | \$ | 131.78 | \$ | 158.34 | \$ | 290.12 | \$ | - | \$ | 0.97 | \$ | 0.97 | 0.34\% |
| 2000 | \$ | 173.78 | \$ | 209.82 | \$ | 383.60 | \$ | 173.78 | \$ | 211.12 | \$ | 384.90 | \$ | - | \$ | 1.30 | \$ | 1.30 | 0.34\% |
| 2500 | \$ | 215.79 | \$ | 262.28 | \$ | 478.07 | \$ | 215.79 | \$ | 263.91 | \$ | 479.70 | \$ | - | \$ | 1.63 | \$ | 1.63 | 0.34\% |
| 3000 | \$ | 257.79 | \$ | 314.73 | \$ | 572.52 | \$ | 257.79 | \$ | 316.69 | \$ | 574.48 | \$ | - | \$ | 1.96 | \$ | 1.96 | 0.34\% |
| 3500 | \$ | 299.79 | \$ | 367.19 | \$ | 666.98 | \$ | 299.79 | \$ | 369.47 | \$ | 669.26 | \$ | - | \$ | 2.28 | \$ | 2.28 | 0.34\% |
| 4000 | \$ | 341.79 | \$ | 419.64 | \$ | 761.43 | \$ | 341.79 | \$ | 422.25 | \$ | 764.04 | \$ | - | \$ | 2.61 | \$ | 2.61 | 0.34\% |

## 4 SUMMER MONTHS (June Through September)

## Present Rates <br> vs.

Proposed Rates

| Monthly Usage (kWh) | Present Delivery |  | Present Supply+T |  | Present Total |  | New Delivery |  | New Supply+T |  | New <br> Total |  | Difference |  |  |  | Total |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Delivery | Supply+T |  | Difference |  |  |  |  |  |  |
|  |  | (\$) |  |  |  | \$) |  |  |  | (\$) |  | \$) |  | \$) |  | \$) |  |  |  |  |  |  | (\%) |
| 0 | \$ | 5.77 | \$ | - |  |  | \$ | 5.77 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | - | \$ | - | \$ | - | 0.00\% |
| 25 | \$ | 8.01 | \$ | 2.35 | \$ | 10.36 | \$ | 8.01 | \$ | 2.37 | \$ | 10.38 | \$ | - | \$ | 0.02 | \$ | 0.02 | 0.19\% |
| 50 | \$ | 10.25 | \$ | 4.70 | \$ | 14.95 | \$ | 10.25 | \$ | 4.73 | \$ | 14.98 | \$ | - | \$ | 0.03 | \$ | 0.03 | 0.20\% |
| 75 | \$ | 12.49 | \$ | 7.05 | \$ | 19.54 | \$ | 12.49 | \$ | 7.10 | \$ | 19.59 | \$ | - | \$ | 0.05 | \$ | 0.05 | 0.26\% |
| 100 | \$ | 14.73 | \$ | 9.40 | \$ | 24.13 | \$ | 14.73 | \$ | 9.47 | \$ | 24.20 | \$ | - | \$ | 0.07 | \$ | 0.07 | 0.29\% |
| 150 | \$ | 19.20 | \$ | 14.10 | \$ | 33.30 | \$ | 19.20 | \$ | 14.20 | \$ | 33.40 | \$ | - | \$ | 0.10 | \$ | 0.10 | 0.30\% |
| 200 | \$ | 23.68 | \$ | 18.80 | \$ | 42.48 | \$ | 23.68 | \$ | 18.93 | \$ | 42.61 | \$ | - | \$ | 0.13 | \$ | 0.13 | 0.31\% |
| 250 | \$ | 28.16 | \$ | 23.50 | \$ | 51.66 | \$ | 28.16 | \$ | 23.67 | \$ | 51.83 | \$ | - | \$ | 0.17 | \$ | 0.17 | 0.33\% |
| 300 | \$ | 32.64 | \$ | 28.20 | \$ | 60.84 | \$ | 32.64 | \$ | 28.40 | \$ | 61.04 | \$ | - | \$ | 0.20 | \$ | 0.20 | 0.33\% |
| 350 | \$ | 37.12 | \$ | 32.91 | \$ | 70.03 | \$ | 37.12 | \$ | 33.13 | \$ | 70.25 | \$ | - | \$ | 0.22 | \$ | 0.22 | 0.31\% |
| 400 | \$ | 41.59 | \$ | 37.61 | \$ | 79.20 | \$ | 41.59 | \$ | 37.87 | \$ | 79.46 | \$ | - | \$ | 0.26 | \$ | 0.26 | 0.33\% |
| 450 | \$ | 46.07 | \$ | 42.31 | \$ | 88.38 | \$ | 46.07 | \$ | 42.60 | \$ | 88.67 | \$ | - | \$ | 0.29 | \$ | 0.29 | 0.33\% |
| 500 | \$ | 50.55 | \$ | 47.01 | \$ | 97.56 | \$ | 50.55 | \$ | 47.33 | \$ | 97.88 | \$ | - | \$ | 0.32 | \$ | 0.32 | 0.33\% |
| 600 | \$ | 59.50 | \$ | 56.41 | \$ | 115.91 | \$ | 59.50 | \$ | 56.80 | \$ | 116.30 | \$ | - | \$ | 0.39 | \$ | 0.39 | 0.34\% |
| 679 | \$ | 66.58 | \$ | 63.84 | \$ | 130.42 | \$ | 66.58 | \$ | 64.28 | \$ | 130.86 | \$ | - | \$ | 0.44 | \$ | 0.44 | 0.34\% |
| 700 | \$ | 68.46 | \$ | 65.81 | \$ | 134.27 | \$ | 68.46 | \$ | 66.27 | \$ | 134.73 | \$ | - | \$ | 0.46 | \$ | 0.46 | 0.34\% |
| 750 | \$ | 72.94 | \$ | 70.51 | \$ | 143.45 | \$ | 72.94 | \$ | 71.00 | \$ | 143.94 | \$ | - | \$ | 0.49 | \$ | 0.49 | 0.34\% |
| 800 | \$ | 77.95 | \$ | 75.72 | \$ | 153.67 | \$ | 77.95 | \$ | 76.24 | \$ | 154.19 | \$ | - | \$ | 0.52 | \$ | 0.52 | 0.34\% |
| 900 | \$ | 87.98 | \$ | 86.12 | \$ | 174.10 | \$ | 87.98 | \$ | 86.71 | \$ | 174.69 | \$ | - | \$ | 0.59 | \$ | 0.59 | 0.34\% |
| 1000 | \$ | 98.01 | \$ | 96.53 | \$ | 194.54 | \$ | 98.01 | \$ | 97.18 | \$ | 195.19 | \$ | - | \$ | 0.65 | \$ | 0.65 | 0.33\% |
| 1200 | \$ | 118.07 | \$ | 117.35 | \$ | 235.42 | \$ | 118.07 | \$ | 118.13 | \$ | 236.20 | \$ | - | \$ | 0.78 | \$ | 0.78 | 0.33\% |
| 1500 | \$ | 148.17 | \$ | 148.57 | \$ | 296.74 | \$ | 148.17 | \$ | 149.54 | \$ | 297.71 | \$ | - | \$ | 0.97 | \$ | 0.97 | 0.33\% |
| 2000 | \$ | 198.32 | \$ | 200.61 | \$ | 398.93 | \$ | 198.32 | \$ | 201.91 | \$ | 400.23 | \$ | - | \$ | 1.30 | \$ | 1.30 | 0.33\% |
| 2500 | \$ | 248.47 | \$ | 252.64 | \$ | 501.11 | \$ | 248.47 | \$ | 254.27 | \$ | 502.74 | \$ | - | \$ | 1.63 | \$ | 1.63 | 0.33\% |
| 3000 | \$ | 298.62 | \$ | 304.68 | \$ | 603.30 | \$ | 298.62 | \$ | 306.63 | \$ | 605.25 | \$ | - | \$ | 1.95 | \$ | 1.95 | 0.32\% |
| 3500 | \$ | 348.77 | \$ | 356.72 | \$ | 705.49 | \$ | 348.77 | \$ | 359.00 | \$ | 707.77 | \$ | - | \$ | 2.28 | \$ | 2.28 | 0.32\% |
| 4000 | \$ | 398.92 | \$ | 408.76 | \$ | 807.68 | \$ | 398.92 | \$ | 411.36 | \$ | 810.28 | \$ | - | \$ | 2.60 | \$ | 2.60 | 0.32\% |

Annual Average
Present Rates
vs.
Proposed Rates

| Monthly | Present Delivery |  | Present Supply+T |  | Present Total |  | New Delivery |  | New Supply+T |  | New <br> Total |  | Difference |  |  |  | Total |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Usage |  |  | Delivery | Supply+T |  | Difference |  |  |  |  |  |  |
| (kWh) |  | (\$) |  |  |  | \$) |  |  |  | (\$) |  | (\$) |  | \$) |  | \$) |  |  |  |  |  |  |  |
| 0 | \$ | 5.77 | \$ | - |  |  | \$ | 5.77 | \$ | 5.77 | \$ | - | \$ | 5.77 | \$ | - | \$ | - | \$ | - | 0.00\% |
| 25 | \$ | 7.92 | \$ | 2.53 | \$ | 10.45 | \$ | 7.92 | \$ | 2.55 | \$ | 10.47 | \$ | - | \$ | 0.02 | \$ | 0.02 | 0.19\% |
| 50 | \$ | 10.06 | \$ | 5.07 | \$ | 15.13 | \$ | 10.06 | \$ | 5.10 | \$ | 15.16 | \$ | - | \$ | 0.03 | \$ | 0.03 | 0.20\% |
| 75 | \$ | 12.21 | \$ | 7.60 | \$ | 19.81 | \$ | 12.21 | \$ | 7.65 | \$ | 19.86 | \$ | - | \$ | 0.05 | \$ | 0.05 | 0.25\% |
| 100 | \$ | 14.36 | \$ | 10.13 | \$ | 24.49 | \$ | 14.36 | \$ | 10.20 | \$ | 24.56 | \$ | - | \$ | 0.07 | \$ | 0.07 | 0.29\% |
| 150 | \$ | 18.65 | \$ | 15.19 | \$ | 33.84 | \$ | 18.65 | \$ | 15.29 | \$ | 33.94 | \$ | - | \$ | 0.10 | \$ | 0.10 | 0.30\% |
| 200 | \$ | 22.94 | \$ | 20.25 | \$ | 43.19 | \$ | 22.94 | \$ | 20.38 | \$ | 43.32 | \$ | - | \$ | 0.13 | \$ | 0.13 | 0.30\% |
| 250 | \$ | 27.23 | \$ | 25.32 | \$ | 52.55 | \$ | 27.23 | \$ | 25.48 | \$ | 52.71 | \$ | - | \$ | 0.16 | \$ | 0.16 | 0.30\% |
| 300 | \$ | 31.53 | \$ | 30.38 | \$ | 61.91 | \$ | 31.53 | \$ | 30.58 | \$ | 62.11 | \$ | - | \$ | 0.20 | \$ | 0.20 | 0.32\% |
| 350 | \$ | 35.82 | \$ | 35.45 | \$ | 71.27 | \$ | 35.82 | \$ | 35.68 | \$ | 71.50 | \$ | - | \$ | 0.23 | \$ | 0.23 | 0.32\% |
| 400 | \$ | 40.11 | \$ | 40.51 | \$ | 80.62 | \$ | 40.11 | \$ | 40.77 | \$ | 80.88 | \$ | - | \$ | 0.26 | \$ | 0.26 | 0.32\% |
| 450 | \$ | 44.40 | \$ | 45.58 | \$ | 89.98 | \$ | 44.40 | \$ | 45.87 | \$ | 90.27 | \$ | - | \$ | 0.29 | \$ | 0.29 | 0.32\% |
| 500 | \$ | 48.70 | \$ | 50.64 | \$ | 99.34 | \$ | 48.70 | \$ | 50.96 | \$ | 99.66 | \$ | - | \$ | 0.32 | \$ | 0.32 | 0.32\% |
| 600 | \$ | 57.28 | \$ | 60.77 | \$ | 118.05 | \$ | 57.28 | \$ | 61.16 | \$ | 118.44 | \$ | - | \$ | 0.39 | \$ | 0.39 | 0.33\% |
| 679 | \$ | 64.07 | \$ | 68.77 | \$ | 132.84 | \$ | 64.07 | \$ | 69.21 | \$ | 133.28 | \$ | - | \$ | 0.44 | \$ | 0.44 | 0.33\% |
| 700 | \$ | 65.87 | \$ | 70.90 | \$ | 136.77 | \$ | 65.87 | \$ | 71.35 | \$ | 137.22 | \$ | - | \$ | 0.45 | \$ | 0.45 | 0.33\% |
| 750 | \$ | 70.16 | \$ | 75.96 | \$ | 146.12 | \$ | 70.16 | \$ | 76.45 | \$ | 146.61 | \$ | - | \$ | 0.49 | \$ | 0.49 | 0.34\% |
| 800 | \$ | 74.63 | \$ | 81.19 | \$ | 155.82 | \$ | 74.63 | \$ | 81.71 | \$ | 156.34 | \$ | - | \$ | 0.52 | \$ | 0.52 | 0.33\% |
| 900 | \$ | 83.58 | \$ | 91.65 | \$ | 175.23 | \$ | 83.58 | \$ | 92.24 | \$ | 175.82 | \$ | - | \$ | 0.59 | \$ | 0.59 | 0.34\% |
| 1000 | \$ | 92.52 | \$ | 102.12 | \$ | 194.64 | \$ | 92.52 | \$ | 102.77 | \$ | 195.29 | \$ | - | \$ | 0.65 | \$ | 0.65 | 0.33\% |
| 1200 | \$ | 110.41 | \$ | 123.04 | \$ | 233.45 | \$ | 110.41 | \$ | 123.82 | \$ | 234.23 | \$ | - | \$ | 0.78 | \$ | 0.78 | 0.33\% |
| 1500 | \$ | 137.24 | \$ | 154.44 | \$ | 291.68 | \$ | 137.24 | \$ | 155.41 | \$ | 292.65 | \$ | - | \$ | 0.97 | \$ | 0.97 | 0.33\% |
| 2000 | \$ | 181.96 | \$ | 206.75 | \$ | 388.71 | \$ | 181.96 | \$ | 208.05 | \$ | 390.01 | \$ | - | \$ | 1.30 | \$ | 1.30 | 0.33\% |
| 2500 | \$ | 226.68 | \$ | 259.07 | \$ | 485.75 | \$ | 226.68 | \$ | 260.70 | \$ | 487.38 | \$ | - | \$ | 1.63 | \$ | 1.63 | 0.34\% |
| 3000 | \$ | 271.40 | \$ | 311.38 | \$ | 582.78 | \$ | 271.40 | \$ | 313.34 | \$ | 584.74 | \$ | - | \$ | 1.96 | \$ | 1.96 | 0.34\% |
| 3500 | \$ | 316.12 | \$ | 363.70 | \$ | 679.82 | \$ | 316.12 | \$ | 365.98 | \$ | 682.10 | \$ | - | \$ | 2.28 | \$ | 2.28 | 0.34\% |
| 4000 | \$ | 360.83 | \$ | 416.01 | \$ | 776.84 | \$ | 360.83 | \$ | 418.62 | \$ | 779.45 | \$ | - | \$ | 2.61 | \$ | 2.61 | 0.34\% |



## ATLANTIC CITY ELECTRIC COMPANY

MONTHLY GENERAL SERVICE SECONDARY ("MGS Secondary")
4 SUMMER MONTHS (June Through September)


Present Rates



ATLANTIC CITY ELECTRIC COMPANY
$\frac{\text { MONTHLY GENERAL SERVICE PRIMARY ("MGS Primary") }}{4 \text { SUMMER MONTHS (June Through September) }}$
Present Rates


ATLANTIC CITY ELECTRIC COMPANY
MONTHLY GENERAL SERVICE PRIMARY ("MGS Primary")
Present Rates

| Present Rates vs. <br> Proposed Rates |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Demand | Load <br> Factor | Energy |  |  | Present Distribution |  | Present BGS and Other Charges |  | Present Total |  | New Distribution |  | New <br> BGS and Other Charges |  |  | New <br> Total | Difference |  | Difference BGS and Other Charges |  | Total Difference |  | Total Difference |
| (kW) | (\%) | (kWh) | Dist kW | Trans kW |  | (\$) |  | (\$) |  | (\$) |  | (\$) |  |  |  | (\$) |  |  |  |  |  | (\$) | (\%) |
| 5 | 20 | 730 | 5.00 | 2 | \$ | 53.25 | \$ | 73.77 | \$ | 127.02 | \$ | 53.25 | \$ | 74.25 | \$ | 127.49 | \$ | - | \$ | 0.48 | \$ | 0.48 | 0.4\% |
| 5 | 30 | 1,095 | 5.00 | 2 | \$ | 69.15 | \$ | 108.38 | \$ | 177.54 | \$ | 69.15 | \$ | 109.10 | \$ | 178.25 | \$ | - | \$ | 0.71 | \$ | 0.71 | 0.4\% |
| 5 | 40 | 1,460 | 5.00 | 2 | \$ | 85.06 | \$ | 142.99 | \$ | 228.05 | \$ | 85.06 | \$ | 143.94 | \$ | 229.00 | \$ | - | \$ | 0.95 | \$ | 0.95 | 0.4\% |
| 5 | 50 | 1,825 | 5.00 | 2 | \$ | 100.97 | \$ | 177.60 | \$ | 278.57 | \$ | 100.97 | \$ | 178.79 | \$ | 279.76 | \$ | - | \$ | 1.19 | \$ | 1.19 | 0.4\% |
| 5 | 60 | 2,190 | 5.00 | 2 | \$ | 116.87 | \$ | 212.21 | \$ | 329.08 | \$ | 116.87 |  | 213.64 | \$ | 330.51 | \$ |  | \$ | 1.43 | \$ | 1.43 | 0.4\% |
| 5 | 70 | 2,555 | 5.00 | 2 | \$ | 132.78 | \$ | 246.82 | \$ | 379.60 | \$ | 132.78 | \$ | 248.49 | \$ | 381.26 | \$ | - | \$ | 1.66 | \$ | 1.66 | 0.4\% |
| 5 | 80 | 2,920 | 5.00 | 2 | \$ | 148.68 | \$ | 281.43 | \$ | 430.12 | \$ | 148.68 | \$ | 283.33 | \$ | 432.02 | \$ | - | \$ | 1.90 | \$ | 1.90 | 0.4\% |
| 10 | 20 | 1,460 | 10.00 | 7 | \$ | 91.79 | \$ | 154.38 | \$ | 246.17 | \$ | 91.79 | \$ | 155.33 | \$ | 247.12 | \$ | - | \$ | 0.95 | \$ | 0.95 | 0.4\% |
| 10 | 30 | 2,190 | 10.00 | 7 | \$ | 123.61 | \$ | 223.60 | \$ | 347.20 | \$ | 123.61 | \$ | 225.02 | \$ | 348.63 | \$ | - | \$ | 1.43 | \$ | 1.43 | 0.4\% |
| 10 | 40 | 2,920 | 10.00 | 7 | \$ | 155.42 | \$ | 292.82 | \$ | 448.23 | \$ | 155.42 | \$ | 294.72 | \$ | 450.14 | \$ | - | \$ | 1.90 | \$ | 1.90 | 0.4\% |
| 10 | 50 | 3,650 | 10.00 | 7 | \$ | 187.23 | \$ | 362.04 | \$ | 549.27 | \$ | 187.23 | \$ | 364.41 | \$ | 551.64 | \$ | - | \$ | 2.38 | \$ | 2.38 | 0.4\% |
| 10 | 60 | 4,380 | 10.00 | 7 | \$ | 219.04 | \$ | 431.26 | \$ | 650.30 | \$ | 219.04 | \$ | 434.11 | \$ | 653.15 | \$ | - | \$ | 2.85 | \$ | 2.85 | 0.4\% |
| 10 | 70 | 5,110 | 10.00 | 7 | \$ | 250.86 | \$ | 500.48 | \$ | 751.33 | \$ | 250.86 | \$ | 503.80 | \$ | 754.66 | \$ | - | \$ | 3.33 | \$ | 3.33 | 0.4\% |
| 10 | 80 | 5,840 | 10.00 | 7 | \$ | 282.67 | \$ | 569.70 | \$ | 852.37 | \$ | 282.67 | \$ | 573.50 | \$ | 856.17 | \$ | - | \$ | 3.80 | \$ | 3.80 | 0.4\% |
| 20 | 20 | 2,920 | 20.00 | 17 | \$ | 168.88 | \$ | 315.58 | \$ | 484.47 | \$ | 168.88 | \$ | 317.48 | \$ | 486.37 | \$ | - | \$ | 1.90 | \$ | 1.90 | 0.4\% |
| 20 | 30 | 4,380 | 20.00 | 17 | \$ | 232.51 | \$ | 454.02 | \$ | 686.53 | \$ | 232.51 | \$ | 456.87 | \$ | 689.38 | \$ | - | \$ | 2.85 | \$ | 2.85 | 0.4\% |
| 20 | 40 | 5,840 | 20.00 | 17 | \$ | 296.14 | \$ | 592.46 | \$ | 888.60 | \$ | 296.14 | \$ | 596.26 | \$ | 892.40 | \$ | - | \$ | 3.80 | \$ | 3.80 | 0.4\% |
| 20 | 50 | 7,300 | 20.00 | 17 | \$ | 359.76 | \$ | 730.90 | \$ | 1,090.66 | \$ | 359.76 | \$ | 735.65 | \$ | 1,095.42 | \$ | - | \$ | 4.75 | \$ | 4.75 | 0.4\% |
| 20 | 60 | 8,760 | 20.00 | 17 | \$ | 423.39 | \$ | 869.34 | \$ | 1,292.73 | \$ | 423.39 | \$ | 875.04 | \$ | 1,298.43 | \$ | - | \$ | 5.70 | \$ | 5.70 | 0.4\% |
| 20 | 70 | 10,220 | 20.00 | 17 | \$ | 487.01 | \$ | 1,007.78 | \$ | 1,494.79 | \$ | 487.01 | \$ | 1,014.43 | \$ | 1,501.45 | \$ | - | \$ | 6.65 | \$ | 6.65 | 0.4\% |
| 20 | 80 | 11,680 | 20.00 | 17 | \$ | 550.64 | \$ | 1,146.22 | \$ | 1,696.86 | \$ | 550.64 | \$ | 1,153.82 | \$ | 1,704.46 | \$ | - | \$ | 7.60 | \$ | 7.60 | 0.4\% |
| 30 | 20 | 4,380 | 30.00 | 27 | \$ | 245.98 | \$ | 476.79 | \$ | 722.77 | \$ | 245.98 | \$ | 479.64 | \$ | 725.62 | \$ |  | \$ | 2.85 | \$ | 2.85 | 0.4\% |
| 30 | 30 | 6,570 | 30.00 | 27 | \$ | 341.42 | \$ | 684.45 | \$ | 1,025.86 | \$ | 341.42 | \$ | 688.73 | \$ | 1,030.14 | \$ | - | \$ | 4.28 | \$ | 4.28 | 0.4\% |
| 30 | 40 | 8,760 | 30.00 | 27 | \$ | 436.85 | \$ | 892.11 | \$ | 1,328.96 | \$ | 436.85 | \$ | 897.81 | \$ | 1,334.67 | \$ | - | \$ | 5.70 | \$ | 5.70 | 0.4\% |
| 30 | 50 | 10,950 | 30.00 | 27 | \$ | 532.29 | \$ | 1,099.77 | \$ | 1,632.06 | \$ | 532.29 | \$ | 1,106.90 | \$ | 1,639.19 | \$ | - | \$ | 7.13 | \$ | 7.13 | 0.4\% |
| 30 | 60 | 13,140 | 30.00 | 27 | \$ | 627.73 | \$ | 1,307.43 | \$ | 1,935.16 | \$ | 627.73 | \$ | 1,315.98 | \$ | 1,943.71 | \$ | - | \$ | 8.55 | \$ | 8.55 | 0.4\% |
| 30 | 70 | 15,330 | 30.00 | 27 | \$ | 723.17 | \$ | 1,515.09 | \$ | 2,238.26 | \$ | 723.17 | \$ | 1,525.07 | \$ | 2,248.24 | \$ | - | \$ | 9.98 | \$ | 9.98 | 0.4\% |
| 30 | 80 | 17,520 | 30.00 | 27 | \$ | 818.61 | \$ | 1,722.75 | \$ | 2,541.36 | \$ | 818.61 | \$ | 1,734.15 | \$ | 2,552.76 | \$ | - | \$ | 11.41 | \$ | 11.41 | 0.4\% |
| 50 | 20 | 7,300 | 50.00 | 47 | \$ | 400.16 | \$ | 799.20 | \$ | 1,199.36 | \$ | 400.16 | \$ | 803.95 | \$ | 1,204.12 | \$ | - | \$ | 4.75 | \$ | 4.75 | 0.4\% |
| 50 | 30 | 10,950 | 50.00 | 47 | \$ | 559.23 | \$ | 1,145.30 | \$ | 1,704.53 | \$ | 559.23 | \$ | 1,152.43 | \$ | 1,711.66 | \$ | - | \$ | 7.13 | \$ | 7.13 | 0.4\% |
| 50 | 40 | 14,600 | 50.00 | 47 | \$ | 718.29 | \$ | 1,491.40 | \$ | 2,209.69 | \$ | 718.29 | \$ | 1,500.90 | \$ | 2,219.20 | \$ | - | \$ | 9.50 | \$ | 9.50 | 0.4\% |
| 50 | 50 | 18,250 | 50.00 | 47 | \$ | 877.36 | \$ | 1,837.50 | \$ | 2,714.85 | \$ | 877.36 | \$ | 1,849.38 | \$ | 2,726.74 | \$ |  | \$ | 11.88 | \$ | 11.88 | 0.4\% |
| 50 | 60 | 21,900 | 50.00 | 47 | \$ | 1,036.42 | \$ | 2,183.60 | \$ | 3,220.02 | \$ | 1,036.42 | \$ | 2,197.85 | \$ | 3,234.28 | \$ | - | \$ | 14.26 | \$ | 14.26 | 0.4\% |
| 50 | 70 | 25,550 | 50.00 | 47 | \$ | 1,195.49 | \$ | 2,529.70 | \$ | 3,725.18 | \$ | 1,195.49 | \$ | 2,546.33 | \$ | 3,741.82 | \$ | - | \$ | 16.63 | \$ | 16.63 | 0.4\% |
| 50 | 80 | 29,200 | 50.00 | 47 | \$ | 1,354.55 | \$ | 2,875.80 | \$ | 4,230.35 | \$ | 1,354.55 | \$ | 2,894.81 | \$ | 4,249.36 | \$ | - | S | 19.01 | \$ | 19.01 | 0.4\% |
| 75 | 30 | 16,425 | 75.00 | 72 | \$ | 831.49 | \$ | 1,721.37 | \$ | 2,552.86 | \$ | 831.49 | \$ | 1,732.06 | \$ | 2,563.55 | \$ | - | \$ | 10.69 | \$ | 10.69 | 0.4\% |
| 75 | 40 | 21,900 | 75.00 | 72 | \$ | 1,070.09 | \$ | 2,240.51 | \$ | 3,310.60 | \$ | 1,070.09 | \$ | 2,254.77 | \$ | 3,324.86 | \$ | - | \$ | 14.26 | \$ | 14.26 | 0.4\% |
| 75 | 50 | 27,375 | 75.00 | 72 | \$ | 1,308.68 | \$ | 2,759.66 | \$ | 4,068.35 | \$ | 1,308.68 | \$ | 2,777.48 | \$ | 4,086.17 | \$ | - |  | 17.82 | \$ | 17.82 | 0.4\% |
| 75 | 60 | 32,850 | 75.00 | 72 | \$ | 1,547.28 | \$ | 3,278.81 | \$ | 4,826.09 | \$ | 1,547.28 | \$ | 3,300.20 | \$ | 4,847.48 | \$ | - | \$ | 21.39 | \$ | 21.39 | 0.4\% |
| 75 | 70 | 38,325 | 75.00 | 72 | \$ | 1,785.88 | \$ | 3,797.96 | \$ | 5,583.84 | \$ | 1,785.88 | \$ | 3,822.91 | \$ | 5,608.79 | \$ | - | \$ | 24.95 | \$ | 24.95 | 0.4\% |
| 75 | 80 | 43,800 | 75.00 | 72 | \$ | 2,024.47 | \$ | 4,317.11 | \$ | 6,341.58 | \$ | 2,024.47 | \$ | 4,345.62 | \$ | 6,370.10 | \$ | - | \$ | 28.51 | \$ | 28.51 | 0.4\% |
| 75 | 90 | 49,275 | 75.00 | 72 | \$ | 2,263.07 | \$ | 4,836.26 | \$ | 7,099.33 | \$ | 2,263.07 | \$ | 4,868.34 | \$ | 7,131.41 | \$ | - | \$ | 32.08 | \$ | 32.08 | 0.5\% |
| 100 | 30 | 21,900 | 100.00 | 97 | \$ | 1,103.75 | \$ | 2,297.43 | \$ | 3,401.19 | \$ | 1,103.75 | \$ | 2,311.69 | \$ | 3,415.44 | \$ | - | \$ | 14.26 | \$ | 14.26 | 0.4\% |
| 100 | 40 | 29,200 | 100.00 | 97 | \$ | 1,421.88 | \$ | 2,989.63 | \$ | 4,411.51 | \$ | 1,421.88 | \$ | 3,008.64 | \$ | 4,430.52 | \$ | - | \$ | 19.01 | \$ | 19.01 | 0.4\% |
| 100 | 50 | 36,500 | 100.00 | 97 | \$ | 1,740.01 | \$ | 3,681.83 | \$ | 5,421.84 | \$ | 1,740.01 | \$ | 3,705.59 | \$ | 5,445.60 | \$ | - | \$ | 23.76 | \$ | 23.76 | 0.4\% |
| 100 | 60 | 43,800 | 100.00 | 97 | \$ | 2,058.14 | \$ | 4,374.03 | \$ | 6,432.17 | \$ | 2,058.14 | \$ | 4,402.54 | \$ | 6,460.68 | \$ | - | \$ | 28.51 | \$ | 28.51 | 0.4\% |
| 100 | 70 | 51,100 | 100.00 | 97 | \$ | 2,376.27 | \$ | 5,066.22 | \$ | 7,442.49 | \$ | 2,376.27 | \$ | 5,099.49 | \$ | 7,475.76 | \$ | - | \$ | 33.27 | \$ | 33.27 | 0.4\% |
| 100 | 80 | 58,400 | 100.00 | 97 | \$ | 2,694.40 | \$ | 5,758.42 | \$ | 8,452.82 | \$ | 2,694.40 | \$ | 5,796.44 | \$ | 8,490.84 | \$ | - |  | 38.02 | \$ | 38.02 | 0.4\% |
| 100 | 90 | 65,700 | 100.00 | 97 | \$ | 3,012.53 | \$ | 6,450.62 | \$ | 9,463.15 | \$ | 3,012.53 | \$ | 6,493.39 | \$ | 9,505.92 | \$ | - | \$ | 42.77 |  | 42.77 | 0.5\% |
| 200 | 30 | 43,800 | 200.00 | 197 | \$ | 2,192.81 | \$ | 4,601.69 | \$ | 6,794.50 | \$ | 2,192.81 | \$ | 4,630.21 | \$ | 6,823.01 | \$ | - | \$ | 28.51 | \$ | 28.51 | 0.4\% |
| 200 | 40 | 58,400 | 200.00 | 197 | \$ | 2,829.07 | \$ | 5,986.09 | \$ | 8,815.16 | S | 2,829.07 | \$ | 6,024.11 | \$ | 8,853.17 | \$ | - | \$ | 38.02 |  | 38.02 | 0.4\% |
| 200 | 50 | 73,000 | 200.00 | 197 | \$ | 3,465.32 | \$ | 7,370.49 | \$ | 10,835.81 | \$ | 3,465.32 | \$ | 7,418.01 | \$ | 10,883.33 | \$ | - | \$ | 47.52 | + | 47.52 | 0.4\% |
| 200 | 60 | 87,600 | 200.00 | 197 | \$ | 4,101.58 | \$ | 8,754.88 | \$ | 12,856.46 | \$ | 4,101.58 | \$ | 8,811.91 | \$ | 12,913.49 | \$ | - | \$ | 57.03 | \$ | 57.03 | 0.4\% |
| 200 | 70 | 102,200 | 200.00 | 197 | \$ | 4,737.84 | \$ | 10,139.28 | \$ | 14,877.12 | \$ | 4,737.84 | \$ | 10,205.81 | \$ | 14,943.65 | \$ | - |  | 66.53 | \$ | 66.53 | 0.4\% |
| 200 | 80 | 116,800 | 200.00 | 197 | \$ | 5,374.10 | \$ | 11,523.67 | \$ | 16,897.77 | \$ | 5,374.10 | \$ | 11,599.71 | \$ | 16,973.81 | \$ | - | \$ | 76.04 | \$ | 76.04 | 0.4\% |
| 200 | 90 | 131,400 | 200.00 | 197 | \$ | 6,010.36 | \$ | 12,908.07 | \$ | 18,918.43 | \$ | 6,010.36 | \$ | 12,993.61 | \$ | 19,003.97 | \$ | - | \$ | 85.54 | \$ | 85.54 | 0.5\% |

ATLANTIC CITY ELECTRIC COMPANY
$\frac{\text { ANNUAL GENERAL SERVICE SECONDARY ("AGS Secondary"' }}{8 \text { WINTER MONTHS (October Through May) }}$
8 WINTER MONTHS (October Through May)


ATLANTIC CITY ELECTRIC COMPANY
$\frac{\text { ANNUAL GENERAL SERVICE SECONDARY ("AGS Secondary"' }}{4 \text { SUMMER MONTHS (June Through September) }}$
Present Rates
vs.

| Demand | Load <br> Factor | Energy | Metered kW | Billed kW | Present Distribution |  | PresentBGS and Other Charges |  | vs. |  |  |  |  |  |  |  | Difference Distribution |  | Difference <br> BGS and Other Charges |  | Total Difference |  | Total Difference |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  | Present Total |  | New Nistribution |  | New <br> GS and |  | New <br> Total |  |  |  |  |  |  |  |
| (kW) | (\%) | (kWh) |  |  |  | (\$) |  |  |  | (\$) |  | (\$) |  | (\$) |  | (\$) |  | (\$) |  | \$) |  | (\$) |  | (\$) | (\%) |
| 25 | 20 | 3,650 | 25 | 25 | \$ | 471.47 | \$ | 455.81 | \$ | 927.28 | \$ | 471.47 | \$ | 458.19 | \$ | 929.66 | \$ | - | \$ | 2.38 | \$ | 2.38 | 0.3\% |
| 25 | 30 | 5,475 | 25 | 25 | \$ | 471.47 | \$ | 641.22 | \$ | 1,112.69 | \$ | 471.47 | \$ | 644.79 | \$ | 1,116.26 | \$ | - | \$ | 3.56 | \$ | 3.56 | 0.3\% |
| 25 | 40 | 7,300 | 25 | 25 | \$ | 471.47 | \$ | 826.63 | \$ | 1,298.10 | \$ | 471.47 | \$ | 831.38 | \$ | 1,302.85 | \$ |  | \$ | 4.75 | \$ | 4.75 | 0.4\% |
| 25 | 50 | 9,125 | 25 | 25 | \$ | 471.47 | \$ | 1,012.04 | \$ | 1,483.51 | \$ | 471.47 | \$ | 1,017.98 | \$ | 1,489.45 | \$ |  | \$ | 5.94 | \$ | 5.94 | 0.4\% |
| 25 | 60 | 10,950 | 25 | 25 | \$ | 471.47 | \$ | 1,197.44 | \$ | 1,668.91 | \$ | 471.47 | \$ | 1,204.57 | \$ | 1,676.04 | \$ |  | \$ | 7.13 | \$ | 7.13 | 0.4\% |
| 25 | 70 | 12,775 | 25 | 25 | \$ | 471.47 | \$ | 1,382.85 | \$ | 1,854.32 | \$ | 471.47 | \$ | 1,391.17 | \$ | 1,862.64 | \$ |  | \$ | 8.32 | \$ | 8.32 | 0.4\% |
| 25 | 80 | 14,600 | 25 | 25 | \$ | 471.47 | \$ | 1,568.26 | \$ | 2,039.73 | \$ | 471.47 | \$ | 1,577.76 | \$ | 2,049.23 | \$ | - | \$ | 9.50 | \$ | 9.50 | 0.5\% |
| 50 | 20 | 7,300 | 50 | 50 | \$ | 749.72 | \$ | 911.63 | \$ | 1,661.35 | \$ | 749.72 | \$ | 916.38 | \$ | 1,666.10 | \$ |  | \$ | 4.75 | \$ | 4.75 | 0.3\% |
| 50 | 30 | 10,950 | 50 | 50 | \$ | 749.72 | \$ | 1,282.44 | \$ | 2,032.16 | \$ | 749.72 | \$ | 1,289.57 | \$ | 2,039.29 | \$ |  | \$ | 7.13 | \$ | 7.13 | 0.4\% |
| 50 | 40 | 14,600 | 50 | 50 | \$ | 749.72 | \$ | 1,653.26 | \$ | 2,402.98 | \$ | 749.72 | \$ | 1,662.76 | \$ | 2,412.48 | \$ |  | \$ | 9.50 | \$ | 9.50 | 0.4\% |
| 50 | 50 | 18,250 | 50 | 50 | \$ | 749.72 | \$ | 2,024.07 | \$ | 2,773.79 | \$ | 749.72 | \$ | 2,035.95 | \$ | 2,785.67 | \$ |  | \$ | 11.88 | \$ | 11.88 | 0.4\% |
| 50 | 60 | 21,900 | 50 | 50 | \$ | 749.72 | \$ | 2,394.89 | \$ | 3,144.61 | \$ | 749.72 | \$ | 2,409.14 | \$ | 3,158.86 | \$ |  | \$ | 14.26 | \$ | 14.26 | 0.5\% |
| 50 | 70 | 25,550 | 50 | 50 | \$ | 749.72 | \$ | 2,765.70 | \$ | 3,515.42 | \$ | 749.72 | \$ | 2,782.33 | \$ | 3,532.05 | \$ |  | \$ | 16.63 | \$ | 16.63 | 0.5\% |
| 50 | 80 | 29,200 | 50 | 50 | \$ | 749.72 | \$ | 3,136.52 | \$ | 3,886.24 | \$ | 749.72 | \$ | 3,155.52 | \$ | 3,905.24 | \$ | - | \$ | 19.01 | \$ | 19.01 | 0.5\% |
| 100 | 20 | 14,600 | 100 | 100 | \$ | 1,306.22 | \$ | 1,823.26 | \$ | 3,129.48 | \$ | 1,306.22 | \$ | 1,832.76 | \$ | 3,138.98 | \$ | - | \$ | 9.50 | \$ | 9.50 | 0.3\% |
| 100 | 30 | 21,900 | 100 | 100 | \$ | 1,306.22 | \$ | 2,564.89 | \$ | 3,871.11 | \$ | 1,306.22 | \$ | 2,579.14 | \$ | 3,885.36 | \$ | - | \$ | 14.26 | \$ | 14.26 | 0.4\% |
| 100 | 40 | 29,200 | 100 | 100 | \$ | 1,306.22 | \$ | 3,306.52 | \$ | 4,612.74 | \$ | 1,306.22 | \$ | 3,325.52 | \$ | 4,631.74 | \$ |  | \$ | 19.01 | \$ | 19.01 | 0.4\% |
| 100 | 50 | 36,500 | 100 | 100 | \$ | 1,306.22 | \$ | 4,048.14 | \$ | 5,354.36 | \$ | 1,306.22 | \$ | 4,071.91 | \$ | 5,378.13 | \$ |  | \$ | 23.76 | \$ | 23.76 | 0.4\% |
| 100 | 60 | 43,800 | 100 | 100 | \$ | 1,306.22 | \$ | 4,789.77 | \$ | 6,095.99 | \$ | 1,306.22 | \$ | 4,818.29 | \$ | 6,124.51 | \$ | - | \$ | 28.51 | \$ | 28.51 | 0.5\% |
| 100 | 70 | 51,100 | 100 | 100 | \$ | 1,306.22 | \$ | 5,531.40 | \$ | 6,837.62 | \$ | 1,306.22 | \$ | 5,564.67 | \$ | 6,870.89 | \$ | - | \$ | 33.27 | \$ | 33.27 | 0.5\% |
| 100 | 80 | 58,400 | 100 | 100 | \$ | 1,306.22 | \$ | 6,273.03 | \$ | 7,579.25 | \$ | 1,306.22 | \$ | 6,311.05 | \$ | 7,617.27 | \$ | - | \$ | 38.02 | \$ | 38.02 | 0.5\% |
| 300 | 20 | 43,800 | 300 | 300 | \$ | 3,532.22 | \$ | 5,469.77 | \$ | 9,001.99 | \$ | 3,532.22 | \$ | 5,498.29 | \$ | 9,030.51 | \$ |  | \$ | 28.51 | \$ | 28.51 | 0.3\% |
| 300 | 30 | 65,700 | 300 | 300 | \$ | 3,532.22 | \$ | 7,694.66 | \$ | 11,226.88 | \$ | 3,532.22 | \$ | 7,737.43 | \$ | 11,269.65 | \$ |  | \$ | 42.77 | \$ | 42.77 | 0.4\% |
| 300 | 40 | 87,600 | 300 | 300 | \$ | 3,532.22 | \$ | 9,919.55 | \$ | 13,451.77 | \$ | 3,532.22 | \$ | 9,976.57 | \$ | 13,508.79 | \$ | - | \$ | 57.03 | \$ | 57.03 | 0.4\% |
| 300 | 50 | 109,500 | 300 | 300 | \$ | 3,532.22 | \$ | 12,144.43 | \$ | 15,676.65 | \$ | 3,532.22 | \$ | 12,215.72 | \$ | 15,747.94 | \$ | - | \$ | 71.28 | \$ | 71.28 | 0.5\% |
| 300 | 60 | 131,400 | 300 | 300 | \$ | 3,532.22 | \$ | 14,369.32 | \$ | 17,901.54 | \$ | 3,532.22 | \$ | 14,454.86 | \$ | 17,987.08 | \$ | - | \$ | 85.54 | \$ | 85.54 | 0.5\% |
| 300 | 70 | 153,300 | 300 | 300 | \$ | 3,532.22 | \$ | 16,594.21 | \$ | 20,126.43 | \$ | 3,532.22 | \$ | 16,694.01 | \$ | 20,226.23 | \$ |  | \$ | 99.80 | \$ | 99.80 | 0.5\% |
| 300 | 80 | 175,200 | 300 | 300 | \$ | 3,532.22 | \$ | 18,819.09 | \$ | 22,351.31 | \$ | 3,532.22 | \$ | 18,933.15 | \$ | 22,465.37 | \$ |  | \$ | 114.06 | \$ | 114.06 | 0.5\% |
| 500 | 20 | 73,000 | 500 | 500 | \$ | 5,758.22 | \$ | 9,116.29 | \$ | 14,874.51 | \$ | 5,758.22 | \$ | 9,163.81 | \$ | 14,922.03 | \$ | - | \$ | 47.52 | \$ | 47.52 | 0.3\% |
| 500 | 30 | 109,500 | 500 | 500 | \$ | 5,758.22 | \$ | 12,824.43 | \$ | 18,582.65 | \$ | 5,758.22 | \$ | 12,895.72 | \$ | 18,653.94 | \$ | - | \$ | 71.28 | \$ | 71.28 | 0.4\% |
| 500 | 40 | 146,000 | 500 | 500 | \$ | 5,758.22 | \$ | 16,532.58 | \$ | 22,290.80 | \$ | 5,758.22 | \$ | 16,627.62 | \$ | 22,385.84 | \$ | - | \$ | 95.05 | \$ | 95.05 | 0.4\% |
| 500 | 50 | 182,500 | 500 | 500 | \$ | 5,758.22 | \$ | 20,240.72 | \$ | 25,998.94 | \$ | 5,758.22 | \$ | 20,359.53 | \$ | 26,117.75 | \$ |  | \$ | 118.81 | \$ | 118.81 | 0.5\% |
| 500 | 60 | 219,000 | 500 | 500 | \$ | 5,758.22 | \$ | 23,948.87 | \$ | 29,707.09 | \$ | 5,758.22 | \$ | 24,091.44 | \$ | 29,849.66 | \$ |  | \$ | 142.57 | \$ | 142.57 | 0.5\% |
| 500 | 70 | 255,500 | 500 | 500 | \$ | 5,758.22 | \$ | 27,657.01 | \$ | 33,415.23 | \$ | 5,758.22 | \$ | 27,823.34 | \$ | 33,581.56 | \$ | - | \$ | 166.33 | \$ | 166.33 | 0.5\% |
| 500 | 80 | 292,000 | 500 | 500 | \$ | 5,758.22 | \$ | 31,365.16 | \$ | 37,123.38 | \$ | 5,758.22 | \$ | 31,555.25 | \$ | 37,313.47 | \$ | - | \$ | 190.09 | \$ | 190.09 | 0.5\% |
| 750 | 30 | 164,250 | 750 | 750 | \$ | 8,540.72 | \$ | 19,236.65 | \$ | 27,777.37 | \$ | 8,540.72 | \$ | 19,343.58 | \$ | 27,884.30 | S |  | \$ | 106.93 | \$ | 106.93 | 0.4\% |
| 750 | 40 | 219,000 | 750 | 750 | \$ | 8,540.72 | \$ | 24,798.87 | \$ | 33,339.59 | S | 8,540.72 | \$ | 24,941.44 | \$ | 33,482.16 | \$ | - | \$ | 142.57 | \$ | 142.57 | 0.4\% |
| 750 | 50 | 273,750 | 750 | 750 | \$ | 8,540.72 | \$ | 30,361.08 | \$ | 38,901.80 | \$ | 8,540.72 | \$ | 30,539.30 | \$ | 39,080.02 | \$ |  | \$ | 178.21 | \$ | 178.21 | 0.5\% |
| 750 | 60 | 328,500 | 750 | 750 | \$ | 8,540.72 | \$ | 35,923.30 | \$ | 44,464.02 | \$ | 8,540.72 | \$ | 36,137.15 | \$ | 44,677.87 | \$ | - | \$ | 213.85 | \$ | 213.85 | 0.5\% |
| 750 | 70 | 383,250 | 750 | 750 | \$ | 8,540.72 |  | 41,485.52 | \$ | 50,026.24 | \$ | 8,540.72 | \$ | 41,735.01 | \$ | 50,275.73 | \$ | - | \$ | 249.50 | \$ | 249.50 | 0.5\% |
| 750 | 80 | 438,000 | 750 | 750 | \$ | 8,540.72 | \$ | 47,047.73 | \$ | 55,588.45 | \$ | 8,540.72 | \$ | 47,332.87 | \$ | 55,873.59 | \$ | - | \$ | 285.14 | \$ | 285.14 | 0.5\% |
| 750 | 90 | 492,750 | 750 | 750 | \$ | 8,540.72 | \$ | 52,609.95 | \$ | 61,150.67 | \$ | 8,540.72 | \$ | 52,930.73 | \$ | 61,471.45 | \$ | - | \$ | 320.78 | \$ | 320.78 | 0.5\% |
| 1000 | 30 | 219,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 25,648.87 | \$ | 36,972.09 | \$ | 11,323.22 | \$ | 25,791.44 | \$ | 37,114.66 | \$ | - | \$ | 142.57 | \$ | 142.57 | 0.4\% |
| 1000 | 40 | 292,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 33,065.16 | \$ | 44,388.38 | \$ | 11,323.22 | \$ | 33,255.25 | \$ | 44,578.47 | \$ | - | \$ | 190.09 | \$ | 190.09 | 0.4\% |
| 1000 | 50 | 365,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 40,481.45 | \$ | 51,804.67 | \$ | 11,323.22 | \$ | 40,719.06 | \$ | 52,042.28 | \$ | - | \$ | 237.61 | \$ | 237.61 | 0.5\% |
| 1000 | 60 | 438,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 47,897.73 | \$ | 59,220.95 | \$ | 11,323.22 | \$ | 48,182.87 | \$ | 59,506.09 | \$ |  | \$ | 285.14 | \$ | 285.14 | 0.5\% |
| 1000 | 70 | 511,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 55,314.02 | \$ | 66,637.24 | \$ | 11,323.22 | \$ | 55,646.68 | \$ | 66,969.90 | \$ | - | \$ | 332.66 | \$ | 332.66 | 0.5\% |
| 1000 | 80 | 584,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 62,730.31 | \$ | 74,053.53 | \$ | 11,323.22 | \$ | 63,110.50 | \$ | 74,433.72 | \$ | - | \$ | 380.18 | \$ | 380.18 | 0.5\% |
| 1000 | 90 | 657,000 | 1,000 | 1,000 | \$ | 11,323.22 | \$ | 70,146.60 | \$ | 81,469.82 | \$ | 11,323.22 | \$ | 70,574.31 | \$ | 81,897.53 | \$ | - | \$ | 427.71 | \$ | 427.71 | 0.5\% |
| 2000 | 30 | 438,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 51,297.73 | \$ | 73,750.95 | \$ | 22,453.22 | \$ | 51,582.87 |  | 74,036.09 | \$ | - | \$ | 285.14 | \$ | 285.14 | 0.4\% |
| 2000 | 40 | 584,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 66,130.31 | \$ | 88,583.53 | \$ | 22,453.22 | \$ | 66,510.50 | \$ | 88,963.72 | \$ |  | \$ | 380.18 | \$ | 380.18 | 0.4\% |
| 2000 | 50 | 730,000 | 2,000 | 2,000 | \$ | 22,453.22 | s | 80,962.89 | \$ | 103,416.11 | \$ | 22,453.22 | \$ | 81,438.12 | \$ | 103,891.34 | \$ | - | \$ | 475.23 | \$ | 475.23 | 0.5\% |
| 2000 | 60 | 876,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 95,795.47 | \$ | 118,248.69 | \$ | 22,453.22 | \$ | 96,365.74 | \$ | 118,818.96 | \$ | - | \$ | 570.28 | \$ | 570.28 | 0.5\% |
| 2000 | 70 | 1,022,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 110,628.05 | \$ | 133,081.27 | \$ | 22,453.22 | \$ | 111,293.37 | \$ | 133,746.59 | \$ | - | \$ | 665.32 | \$ | 665.32 | 0.5\% |
| 2000 | 80 | 1,168,000 | 2,000 | 2,000 | \$ | 22,453.22 |  | 125,460.62 | \$ | 147,913.84 | \$ | 22,453.22 | \$ | 126,220.99 | \$ | 148,674.21 | \$ | - | \$ | 760.37 | \$ | 760.37 | 0.5\% |
| 2000 | 90 | 1,314,000 | 2,000 | 2,000 | \$ | 22,453.22 | \$ | 140,293.20 | \$ | 162,746.42 | \$ | 22,453.22 | \$ | 141,148.62 | \$ | 163,601.84 | \$ | - | \$ | 855.41 | \$ | 855.41 | 0.5\% |

ATLANTIC CITY ELECTRIC COMPANY
ANNUAL GENERAL SERVICE SECONDARY ("AGS Secondary"': Annual Average

Present Rates
vs.

| Proposed Rates |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Demand | Load <br> Factor | Energy |  |  | Present Distribution (\$) |  | PresentBGS and Other Charges |  | Present$\frac{\text { Total }}{(\$)}$ |  | New Distribution |  | New <br> BGS and Other Charges |  |  | New Total | Difference Distribution |  | Difference <br> BGS and Other Charges |  | Total Difference |  | Total Difference |
| (kW) | (\%) | (kWh) | Metered kW | Billed kW |  |  |  |  |  |  |  | (\$) |  |  |  | (\$) |  | (\$) |  |  |  | (\$) | (\%) |
| 25 | 20 | 3,650 | 25.00 | 22 | \$ | 471.47 | \$ | 452.54 | \$ | 924.01 | \$ | 471.47 | \$ | 454.92 | \$ | 926.39 | \$ |  | \$ | 2.38 | \$ | 2.38 | 0.3\% |
| 25 | 30 | 5,475 | 25.00 | 22 | \$ | 471.47 | \$ | 636.31 | \$ | 1,107.78 | \$ | 471.47 | \$ | 639.87 | \$ | 1,111.34 | \$ | - | \$ | 3.56 | \$ | 3.56 | 0.3\% |
| 25 | 40 | 7,300 | 25.00 | 22 | \$ | 471.47 | \$ | 820.08 | \$ | 1,291.55 | \$ | 471.47 | \$ | 824.83 | \$ | 1,296.30 | \$ | - | \$ | 4.75 | \$ | 4.75 | 0.4\% |
| 25 | 50 | 9,125 | 25.00 | 22 | \$ | 471.47 | \$ | 1,003.85 | \$ | 1,475.32 | \$ | 471.47 | \$ | 1,009.79 | \$ | 1,481.26 | \$ |  | \$ | 5.94 | \$ | 5.94 | 0.4\% |
| 25 | 60 | 10,950 | 25.00 | 22 | \$ | 471.47 | \$ | 1,187.62 | \$ | 1,659.09 | \$ | 471.47 | \$ | 1,194.75 | \$ | 1,666.22 | \$ |  | \$ | 7.13 | \$ | 7.13 | 0.4\% |
| 25 | 70 | 12,775 | 25.00 | 22 | \$ | 471.47 | \$ | 1,371.39 | \$ | 1,842.86 | \$ | 471.47 | \$ | 1,379.70 | \$ | 1,851.17 | \$ |  | \$ | 8.32 | \$ | 8.32 | 0.5\% |
| 25 | 80 | 14,600 | 25.00 | 22 | \$ | 471.47 | \$ | 1,555.16 | \$ | 2,026.63 | \$ | 471.47 | \$ | 1,564.66 | \$ | 2,036.13 | \$ | - | \$ | 9.50 | \$ | 9.50 | 0.5\% |
| 50 | 20 | 7,300 | 50.00 | 47 | \$ | 749.72 | \$ | 905.08 | \$ | 1,654.80 | \$ | 749.72 | \$ | 909.83 | \$ | 1,659.55 | \$ | - | \$ | 4.75 | \$ | 4.75 | 0.3\% |
| 50 | 30 | 10,950 | 50.00 | 47 | \$ | 749.72 | \$ | 1,272.62 | \$ | 2,022.34 | \$ | 749.72 | \$ | 1,279.75 | \$ | 2,029.47 | \$ |  | \$ | 7.13 | \$ | 7.13 | 0.4\% |
| 50 | 40 | 14,600 | 50.00 | 47 | \$ | 749.72 | \$ | 1,640.16 | \$ | 2,389.88 | \$ | 749.72 | \$ | 1,649.66 | \$ | 2,399.38 | \$ |  | \$ | 9.50 | \$ | 9.50 | 0.4\% |
| 50 | 50 | 18,250 | 50.00 | 47 | \$ | 749.72 | \$ | 2,007.70 | \$ | 2,757.42 | \$ | 749.72 | \$ | 2,019.58 | \$ | 2,769.30 | \$ |  | \$ | 11.88 | \$ | 11.88 | 0.4\% |
| 50 | 60 | 21,900 | 50.00 | 47 | \$ | 749.72 | \$ | 2,375.24 | \$ | 3,124.96 | \$ | 749.72 | \$ | 2,389.49 | \$ | 3,139.21 | \$ |  | \$ | 14.26 | \$ | 14.26 | 0.5\% |
| 50 | 70 | 25,550 | 50.00 | 47 | \$ | 749.72 | \$ | 2,742.77 | \$ | 3,492.49 | \$ | 749.72 | \$ | 2,759.41 | \$ | 3,509.13 | \$ | - | \$ | 16.63 | \$ | 16.63 | 0.5\% |
| 50 | 80 | 29,200 | 50.00 | 47 | \$ | 749.72 | \$ | 3,110.31 | \$ | 3,860.03 | \$ | 749.72 | \$ | 3,129.32 | \$ | 3,879.04 | \$ |  | \$ | 19.01 | \$ | 19.01 | 0.5\% |
| 100 | 20 | 14,600 | 100.00 | 97 | \$ | 1,306.22 | \$ | 1,810.16 | \$ | 3,116.38 | \$ | 1,306.22 | \$ | 1,819.66 | \$ | 3,125.88 | \$ | - | \$ | 9.50 | \$ | 9.50 | 0.3\% |
| 100 | 30 | 21,900 | 100.00 | 97 | \$ | 1,306.22 | \$ | 2,545.24 | \$ | 3,851.46 | \$ | 1,306.22 | \$ | 2,559.49 | \$ | 3,865.71 | \$ |  | \$ | 14.26 | \$ | 14.26 | 0.4\% |
| 100 | 40 | 29,200 | 100.00 | 97 | \$ | 1,306.22 | \$ | 3,280.31 | \$ | 4,586.53 | \$ | 1,306.22 | \$ | 3,299.32 | \$ | 4,605.54 | \$ |  | \$ | 19.01 | \$ | 19.01 | 0.4\% |
| 100 | 50 | 36,500 | 100.00 | 97 | \$ | 1,306.22 | \$ | 4,015.39 | \$ | 5,321.61 | \$ | 1,306.22 | \$ | 4,039.15 | \$ | 5,345.37 | \$ | - | \$ | 23.76 | \$ | 23.76 | 0.4\% |
| 100 | 60 | 43,800 | 100.00 | 97 | \$ | 1,306.22 | \$ | 4,750.47 | \$ | 6,056.69 | \$ | 1,306.22 | \$ | 4,778.98 | \$ | 6,085.20 | \$ | - | \$ | 28.51 | \$ | 28.51 | 0.5\% |
| 100 | 70 | 51,100 | 100.00 | 97 | \$ | 1,306.22 | \$ | 5,485.55 | \$ | 6,791.77 | \$ | 1,306.22 | \$ | 5,518.81 | \$ | 6,825.03 | \$ |  | \$ | 33.27 | \$ | 33.27 | 0.5\% |
| 100 | 80 | 58,400 | 100.00 | 97 | \$ | 1,306.22 | \$ | 6,220.63 | \$ | 7,526.85 | \$ | 1,306.22 | \$ | 6,258.65 | \$ | 7,564.87 | \$ | - | \$ | 38.02 | \$ | 38.02 | 0.5\% |
| 300 | 20 | 43,800 | 300.00 | 297 | \$ | 3,532.22 | \$ | 5,430.47 | \$ | 8,962.69 | \$ | 3,532.22 | \$ | 5,458.98 | \$ | 8,991.20 | \$ |  | \$ | 28.51 | \$ | 28.51 | 0.3\% |
| 300 | 30 | 65,700 | 300.00 | 297 | \$ | 3,532.22 | \$ | 7,635.71 | \$ | 11,167.93 | \$ | 3,532.22 | \$ | 7,678.48 | \$ | 11,210.70 | \$ | - | \$ | 42.77 | \$ | 42.77 | 0.4\% |
| 300 | 40 | 87,600 | 300.00 | 297 | \$ | 3,532.22 | S | 9,840.94 | \$ | 13,373.16 | \$ | 3,532.22 | \$ | 9,897.97 | \$ | 13,430.19 | \$ | - | \$ | 57.03 | \$ | 57.03 | 0.4\% |
| 300 | 50 | 109,500 | 300.00 | 297 | \$ | 3,532.22 | \$ | 12,046.18 | \$ | 15,578.40 | \$ | 3,532.22 | \$ | 12,117.46 | \$ | 15,649.68 | \$ | - | \$ | 71.28 | \$ | 71.28 | 0.5\% |
| 300 | 60 | 131,400 | 300.00 | 297 | \$ | 3,532.22 | \$ | 14,251.41 | \$ | 17,783.63 | \$ | 3,532.22 | \$ | 14,336.95 | \$ | 17,869.17 | \$ | - | \$ | 85.54 | \$ | 85.54 | 0.5\% |
| 300 | 70 | 153,300 | 300.00 | 297 | \$ | 3,532.22 | \$ | 16,456.65 | \$ | 19,988.87 | \$ | 3,532.22 | \$ | 16,556.44 | \$ | 20,088.66 | \$ |  | \$ | 99.80 | \$ | 99.80 | 0.5\% |
| 300 | 80 | 175,200 | 300.00 | 297 | \$ | 3,532.22 | \$ | 18,661.88 | \$ | 22,194.10 | \$ | 3,532.22 | + | 18,775.94 | \$ | 22,308.16 | \$ |  | \$ | 114.06 | \$ | 114.06 | 0.5\% |
| 500 | 20 | 73,000 | 500.00 | 497 | \$ | 5,758.22 | \$ | 9,050.78 | \$ | 14,809.00 | \$ | 5,758.22 | \$ | 9,098.31 | \$ | 14,856.53 | \$ | - | \$ | 47.52 | \$ | 47.52 | 0.3\% |
| 500 | 30 | 109,500 | 500.00 | 497 | \$ | 5,758.22 | \$ | 12,726.18 | \$ | 18,484.40 | \$ | 5,758.22 | \$ | 12,797.46 | \$ | 18,555.68 | \$ | - | \$ | 71.28 | \$ | 71.28 | 0.4\% |
| 500 | 40 | 146,000 | 500.00 | 497 | \$ | 5,758.22 | \$ | 16,401.57 | \$ | 22,159.79 | \$ | 5,758.22 | \$ | 16,496.61 | \$ | 22,254.83 | \$ | - | \$ | 95.05 | \$ | 95.05 | 0.4\% |
| 500 | 50 | 182,500 | 500.00 | 497 | \$ | 5,758.22 | \$ | 20,076.96 | \$ | 25,835.18 | \$ | 5,758.22 | \$ | 20,195.77 | \$ | 25,953.99 | \$ | - | \$ | 118.81 | \$ | 118.81 | 0.5\% |
| 500 | 60 | 219,000 | 500.00 | 497 | \$ | 5,758.22 | \$ | 23,752.35 | \$ | 29,510.57 | \$ | 5,758.22 | \$ | 23,894.92 | \$ | 29,653.14 | \$ |  | \$ | 142.57 | \$ | 142.57 | 0.5\% |
| 500 | 70 | 255,500 | 500.00 | 497 | \$ | 5,758.22 | \$ | 27,427.74 | \$ | 33,185.96 | \$ | 5,758.22 | \$ | 27,594.07 | \$ | 33,352.29 | \$ | - | \$ | 166.33 | \$ | 166.33 | 0.5\% |
| 500 | 80 | 292,000 | 500.00 | 497 | \$ | 5,758.22 | \$ | 31,103.13 | \$ | 36,861.35 | \$ | 5,758.22 | \$ | 31,293.23 | \$ | 37,051.45 | s | - | \$ | 190.09 | \$ | 190.09 | 0.5\% |
| 750 | 30 | 164,250 | 750.00 | 747 | \$ | 8,540.72 | \$ | 19,089.26 | \$ | 27,629.98 | \$ | 8,540.72 | \$ | 19,196.19 | \$ | 27,736.91 | \$ | - | \$ | 106.93 | \$ | 106.93 | 0.4\% |
| 750 | 40 | 219,000 | 750.00 | 747 | \$ | 8,540.72 | \$ | 24,602.35 | \$ | 33,143.07 | \$ | 8,540.72 | \$ | 24,744.92 | \$ | 33,285.64 |  | - | \$ | 142.57 | \$ | 142.57 | 0.4\% |
| 750 | 50 | 273,750 | 750.00 | 747 | \$ | 8,540.72 |  | 30,115.44 | \$ | 38,656.16 | \$ | 8,540.72 | \$ | 30,293.65 | \$ | 38,834.37 | \$ | - | \$ | 178.21 | \$ | 178.21 | 0.5\% |
| 750 | 60 | 328,500 | 750.00 | 747 | \$ | 8,540.72 | \$ | 35,628.53 | \$ | 44,169.25 | \$ | 8,540.72 | \$ | 35,842.38 | \$ | 44,383.10 | \$ | - | \$ | 213.85 | \$ | 213.85 | 0.5\% |
| 750 | 70 | 383,250 | 750.00 | 747 | \$ | 8,540.72 | \$ | 41,141.61 | \$ | 49,682.33 | \$ | 8,540.72 | \$ | 41,391.11 | \$ | 49,931.83 | \$ | - | \$ | 249.50 | \$ | 249.50 | 0.5\% |
| 750 | 80 | 438,000 | 750.00 | 747 | \$ | 8,540.72 | \$ | 46,654.70 | \$ | 55,195.42 | \$ | 8,540.72 | \$ | 46,939.84 | \$ | 55,480.56 | \$ | - | \$ | 285.14 | \$ | 285.14 | 0.5\% |
| 750 | 90 | 492,750 | 750.00 | 747 | \$ | 8,540.72 | \$ | 52,167.79 | \$ | 60,708.51 | \$ | 8,540.72 | \$ | 52,488.57 | \$ | 61,029.29 | \$ |  | \$ | 320.78 | \$ | 320.78 | 0.5\% |
| 1,000 | 30 | 219,000 | 1,000.00 | 997 | \$ | 11,323.22 | \$ | 25,452.35 | \$ | 36,775.57 | \$ | 11,323.22 | \$ | 25,594.92 | \$ | 36,918.14 | \$ | - | \$ | 142.57 | \$ | 142.57 | 0.4\% |
| 1,000 | 40 | 292,000 | 1,000.00 | 997 | \$ | 11,323.22 | \$ | 32,803.13 | \$ | 44,126.35 | \$ | 11,323.22 | \$ | 32,993.23 | \$ | 44,316.45 | \$ | - | \$ | 190.09 | \$ | 190.09 | 0.4\% |
| 1,000 | 50 | 365,000 | 1,000.00 | 997 | \$ | 11,323.22 | \$ | 40,153.92 | \$ | 51,477.14 | \$ | 11,323.22 | \$ | 40,391.53 | \$ | 51,714.75 | \$ | - | \$ | 237.61 | \$ | 237.61 | 0.5\% |
| 1,000 | 60 | 438,000 | 1,000.00 | 997 | \$ | 11,323.22 | \$ | 47,504.70 | \$ | 58,827.92 | \$ | 11,323.22 | \$ | 47,789.84 | \$ | 59,113.06 | \$ | - | \$ | 285.14 | \$ | 285.14 | 0.5\% |
| 1,000 | 70 | 511,000 | 1,000.00 | 997 | \$ | 11,323.22 | \$ | 54,855.49 | \$ | 66,178.71 | \$ | 11,323.22 | \$ | 55,188.15 | \$ | 66,511.37 | \$ | - | \$ | 332.66 | \$ | 332.66 | 0.5\% |
| 1,000 | 80 | 584,000 | 1,000.00 | 997 | \$ | 11,323.22 | S | 62,206.27 | \$ | 73,529.49 | \$ | 11,323.22 | \$ | 62,586.45 | \$ | 73,909.67 | \$ | - | \$ | 380.18 | \$ | 380.18 | 0.5\% |
| 1,000 | 90 | 657,000 | 1,000.00 | 997 | \$ | 11,323.22 | \$ | 69,557.05 | \$ | 80,880.27 | \$ | 11,323.22 | \$ | 69,984.76 | \$ | 81,307.98 | \$ | - | \$ | 427.71 | \$ | 427.71 | 0.5\% |
| 2,000 | 30 | 438,000 | 2,000.00 | 1997 | \$ | 22,453.22 | \$ | 50,904.70 | \$ | 73,357.92 | \$ | 22,453.22 | \$ | 51,189.84 | \$ | 73,643.06 | \$ | - | \$ | 285.14 | \$ | 285.14 | 0.4\% |
| 2,000 | 40 | 584,000 | 2,000.00 | 1997 | \$ | 22,453.22 |  | 65,606.27 | \$ | 88,059.49 | \$ | 22,453.22 | \$ | 65,986.45 | \$ | 88,439.67 | \$ | - | \$ | 380.18 | \$ | 380.18 | 0.4\% |
| 2,000 | 50 | 730,000 | 2,000.00 | 1997 | \$ | 22,453.22 | \$ | 80,307.84 | \$ | 102,761.06 | \$ | 22,453.22 | \$ | 80,783.07 | \$ | 103,236.29 | \$ | - | \$ | 475.23 | \$ | 475.23 | 0.5\% |
| 2,000 | 60 | 876,000 | 2,000.00 | 1997 | \$ | 22,453.22 | \$ | 95,009.40 | \$ | 117,462.62 | \$ | 22,453.22 | \$ | 95,579.68 | \$ | 118,032.90 | \$ | - | \$ | 570.28 | \$ | 570.28 | 0.5\% |
| 2,000 | 70 | 1,022,000 | 2,000.00 | 1997 |  | 22,453.22 | \$ | 109,710.97 | \$ | 132,164.19 | \$ | 22,453.22 |  | 110,376.29 | \$ | 132,829.51 |  | - | \$ | 665.32 | \$ | 665.32 | 0.5\% |
| 2,000 | 80 | 1,168,000 | 2,000.00 | 1997 | S | 22,453.22 | \$ | 124,412.54 | s | 146,865.76 | \$ | 22,453.22 |  | 125,172.91 | \$ | 147,626.13 |  | - | \$ | 760.37 | \$ | 760.37 | 0.5\% |
| 2,000 | 90 | 1,314,000 | 2,000.00 | 1997 | \$ | 22,453.22 | \$ | 139,114.11 | \$ | 161,567.33 | \$ | 22,453.22 | \$ | 139,969.52 | \$ | 162,422.74 | \$ | - | \$ | 855.41 | \$ | 855.41 | 0.5\% |

Present Rates
Load
Energy


ATLANTIC CITY ELECTRIC COMPANY
ANNUAL GENERAL SERVICE PRIMARY ("AGS Primary"
4 SUMMER MONTHS (June Through September)

| $\frac{\text { Demand }}{(\mathrm{kW})}$ | $\begin{aligned} & \text { Load } \\ & \text { Factor } \\ & \hline(\%) \end{aligned}$ | $\frac{\text { Energy }}{(\mathrm{kWh})}$ | Metered kW | Billed kW | D Demand | D Energy |  | {fad15d01b-2586-4897-8a3c-02e778c0839d} Present  <br>  Distribution }$(\$)$ |  | Present BGS and Other Charges <br> (\$) |  | Present Rates vs. <br> Proposed Rates |  |  |  |  |  | $\begin{aligned} & \begin{array}{l} \text { New } \\ \text { Total } \end{array} \\ & \hline \text { ( } \end{aligned}$ |  | Difference Distribution (\$) |  | Difference BGS and Other Charges <br> (\$) |  | Total <br> Difference <br> (\$) |  | $\begin{gathered} \text { Total } \\ \text { Difference } \\ (\%) \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  | $\begin{aligned} & \text { Present } \\ & \frac{\text { Total }}{(\$)} \end{aligned}$ |  |  |  | $\xlongequal{\begin{array}{c} \text { New } \\ \text { Distribution } \\ \text { (\$) } \end{array}}$ |  | $\begin{gathered} \begin{array}{c} \text { New } \\ \text { BGS and Other Charges } \end{array} \\ \text { (\$) } \end{gathered}$ |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 25 | 20 | 3,650 | 25 | 25 | \$ 221.50 |  |  | \$ | 965.65 | \$ | 437.29 | \$ | 1,402.94 | \$ | 965.65 | \$ | 439.66 | \$ | 1,405.31 | \$ |  | \$ | 2.38 | \$ | 2.38 | 0.2\% |
| 25 | 30 | 5,475 | 25 | 25 | \$ 221.50 | \$ | - | \$ | 965.65 | \$ | 616.55 | \$ | 1,582.20 | \$ | 965.65 | \$ | 620.12 | \$ | 1,585.77 | \$ | 5 - | \$ | 3.56 | \$ | 3.56 | 0.2\% |
| 25 | 40 | 7,300 | 25 | 25 | \$ 221.50 | \$ |  | \$ | 965.65 | \$ | 795.82 | \$ | 1,761.47 | \$ | 965.65 | \$ | 800.57 | \$ | 1,766.22 | S | - |  | 4.75 | \$ | 4.75 | 0.3\% |
| 25 | 50 | 9,125 | 25 | 25 | \$ 221.50 | \$ | - | \$ | 965.65 | \$ | 975.09 | \$ | 1,940.74 | \$ | 965.65 | \$ | 981.03 | \$ | 1,946.68 | \$ | - | \$ | 5.94 | \$ | 5.94 | 0.3\% |
| 25 | 60 | 10,950 | 25 | 25 | \$ 221.50 | \$ |  | \$ | 965.65 | \$ | 1,154.36 | \$ | 2,120.01 | \$ | 965.65 | \$ | 1,161.49 | \$ | 2,127.14 | \$ |  | \$ | 7.13 |  | 7.13 | 0.3\% |
| 25 | 70 | 12,775 | 25 | 25 | \$ 221.50 | \$ |  | \$ | 965.65 | \$ | 1,333.63 | \$ | 2,299.28 | \$ | 965.65 | \$ | 1,341.94 | \$ | 2,307.59 | \$ | - | \$ | 8.32 | \$ | 8.32 | 0.4\% |
| 25 | 80 | 14,600 | 25 | 25 | \$ 221.50 | \$ |  | \$ | 965.65 | \$ | 1,512.89 | \$ | 2,478.54 | \$ | 965.65 | \$ | 1,522.40 | \$ | 2,488.05 | \$ |  | \$ | 9.50 | \$ | 9.50 | 0.4\% |
| 50 | 20 | 7,300 | 50 | 50 | \$ 443.00 | \$ |  | \$ | 1,187.15 | \$ | 874.57 | \$ | 2,061.72 | \$ | 1,187.15 | \$ | 879.32 | \$ | 2,066.47 | \$ | - | \$ | 4.75 | \$ | 4.75 | 0.2\% |
| 50 | 30 | 10,950 | 50 | 50 | \$ 443.00 | \$ |  | \$ | 1,187.15 | \$ | 1,233.11 | \$ | 2,420.26 | \$ | 1,187.15 | \$ | 1,240.24 | \$ | 2,427.39 | \$ |  | \$ | 7.13 | \$ | 7.13 | 0.3\% |
| 50 | 40 | 14,600 | 50 | 50 | \$ 443.00 | \$ | - | \$ | 1,187.15 | \$ | 1,591.64 | \$ | 2,778.79 | \$ | 1,187.15 | \$ | 1,601.15 | \$ | 2,788.30 | \$ | - | \$ | 9.50 | \$ | 9.50 | 0.3\% |
| 50 | 50 | 18,250 | 50 | 50 | \$ 443.00 | \$ |  | \$ | 1,187.15 | \$ | 1,950.18 | \$ | 3,137.33 | \$ | 1,187.15 | \$ | 1,962.06 | \$ | 3,149.21 | \$ |  | \$ | 11.88 | \$ | 11.88 | 0.4\% |
| 50 | 60 | 21,900 | 50 | 50 | \$ 443.00 | \$ | - | \$ | 1,187.15 | \$ | 2,308.72 | \$ | 3,495.87 | \$ | 1,187.15 | \$ | 2,322.97 | \$ | 3,510.12 | \$ | - | \$ | 14.26 | \$ | 14.26 | 0.4\% |
| 50 | 70 | 25,550 | 50 | 50 | \$ 443.00 | \$ | - | \$ | 1,187.15 | \$ | 2,667.25 | \$ | 3,854.40 | \$ | 1,187.15 | \$ | 2,683.88 | \$ | 3,871.03 | \$ | - | \$ | 16.63 | \$ | 16.63 | 0.4\% |
| 50 | 80 | 29,200 | 50 | 50 | \$ 443.00 | \$ | - | \$ | 1,187.15 | \$ | 3,025.79 | \$ | 4,212.94 | \$ | 1,187.15 | \$ | 3,044.80 | \$ | 4,231.95 | \$ | - | \$ | 19.01 | \$ | 19.01 | 0.5\% |
| 100 | 20 | 14,600 | 100 | 100 | \$ 886.00 | \$ | - | \$ | 1,630.15 | \$ | 1,749.14 | \$ | 3,379.29 | \$ | 1,630.15 | \$ | 1,758.65 | \$ | 3,388.80 | \$ | - | \$ | 9.50 | \$ | 9.50 | 0.3\% |
| 100 | 30 | 21,900 | 100 | 100 | \$ 886.00 | \$ | - | \$ | 1,630.15 | \$ | 2,466.22 | \$ | 4,096.37 | \$ | 1,630.15 | \$ | 2,480.47 | \$ | 4,110.62 | s | - | \$ | 14.26 | \$ | 14.26 | 0.3\% |
| 100 | 40 | 29,200 | 100 | 100 | \$ 886.00 | \$ | - | \$ | 1,630.15 | \$ | 3,183.29 | \$ | 4,813.44 | \$ | 1,630.15 | \$ | 3,202.30 | \$ | 4,832.45 | \$ |  | \$ | 19.01 | \$ | 19.01 | 0.4\% |
| 100 | 50 | 36,500 | 100 | 100 | \$ 886.00 | \$ | - | \$ | 1,630.15 | \$ | 3,900.36 | \$ | 5,530.51 | \$ | 1,630.15 | \$ | 3,924.12 | \$ | 5,554.27 | \$ | - | \$ | 23.76 | \$ | 23.76 | 0.4\% |
| 100 | 60 | 43,800 | 100 | 100 | \$ 886.00 | \$ | - | \$ | 1,630.15 | \$ | 4,617.43 | \$ | 6,247.58 | \$ | 1,630.15 | \$ | 4,645.94 | \$ | 6,276.09 | \$ | \% | \$ | 28.51 | \$ | 28.51 | 0.5\% |
| 100 | 70 | 51,100 | 100 | 100 | \$ 886.00 | \$ | - | \$ | 1,630.15 | \$ | 5,334.50 | \$ | 6,964.65 | \$ | 1,630.15 | \$ | 5,367.77 | \$ | 6,997.92 | \$ | - | \$ | 33.27 | \$ | 33.27 | 0.5\% |
| 100 | 80 | 58,400 | 100 | 100 | \$ 886.00 | \$ | - | \$ | 1,630.15 | \$ | 6,051.57 | \$ | 7,681.72 | \$ | 1,630.15 | \$ | 6,089.59 | \$ | 7,719.74 | \$ | - | \$ | 38.02 | \$ | 38.02 | 0.5\% |
| 300 | 20 | 43,800 | 300 | 300 | \$ 2,658.00 | \$ | - | \$ | 3,402.15 | \$ | 5,247.43 | s | 8,649.58 | \$ | 3,402.15 | \$ | 5,275.94 | \$ | 8,678.09 | s | - | \$ | 28.51 | \$ | 28.51 | 0.3\% |
| 300 | 30 | 65,700 | 300 | 300 | \$ 2,658.00 | \$ | - | \$ | 3,402.15 | \$ | 7,398.65 | \$ | 10,800.80 | \$ | 3,402.15 | \$ | 7,441.42 | \$ | 10,843.57 | \$ | - | \$ | 42.77 | \$ | 42.77 | 0.4\% |
| 300 | 40 | 87,600 | 300 | 300 | \$ 2,658.00 | \$ |  | \$ | 3,402.15 | \$ | 9,549.86 | s | 12,952.01 | \$ | 3,402.15 | \$ | 9,606.89 | \$ | 13,009.04 | \$ |  | \$ | 57.03 | \$ | 57.03 | 0.4\% |
| 300 | 50 | 109,500 | 300 | 300 | \$ 2,658.00 | \$ | - | \$ | 3,402.15 | \$ | 11,701.08 | \$ | 15,103.23 | \$ | 3,402.15 | \$ | 11,772.36 | \$ | 15,174.51 | \$ |  | \$ | 71.28 | \$ | 71.28 | 0.5\% |
| 300 | 60 | 131,400 | 300 | 300 | \$ 2,658.00 | \$ |  | \$ | 3,402.15 | \$ | 13,852.29 | \$ | 17,254.44 | \$ | 3,402.15 | \$ | 13,937.83 | \$ | 17,339.98 | \$ |  | \$ | 85.54 | \$ | 85.54 | 0.5\% |
| 300 | 70 | 153,300 | 300 | 300 | \$ 2,658.00 | \$ | - | \$ | 3,402.15 | \$ | 16,003.51 | \$ | 19,405.66 | \$ | 3,402.15 | \$ | 16,103.30 | \$ | 19,505.45 | \$ | - | \$ | 99.80 | \$ | 99.80 | 0.5\% |
| 300 | 80 | 175,200 | 300 | 300 | \$ 2,658.00 | \$ | - | \$ | 3,402.15 | \$ | 18,154.72 | \$ | 21,556.87 | \$ | 3,402.15 | \$ | 18,268.78 | \$ | 21,670.93 | \$ |  | \$ | 114.06 | \$ | 114.06 | 0.5\% |
| 500 | 20 | 73,000 | 500 | 500 | \$ 4,430.00 | \$ | - | \$ | 5,174.15 | \$ | 8,745.72 | \$ | 13,919.87 | \$ | 5,174.15 | \$ | 8,793.24 | \$ | 13,967.39 | \$ | - | \$ | 47.52 | \$ | 47.52 | 0.3\% |
| 500 | 30 | 109,500 | 500 | 500 | \$ 4,430.00 | \$ |  | \$ | 5,174.15 | \$ | 12,331.08 | \$ | 17,505.23 | \$ | 5,174.15 | \$ | 12,402.36 | \$ | 17,576.51 | \$ |  | \$ | 71.28 | \$ | 71.28 | 0.4\% |
| 500 | 40 | 146,000 | 500 | 500 | \$ 4,430.00 |  | - | \$ | 5,174.15 | \$ | 15,916.43 | \$ | 21,090.58 | \$ | 5,174.15 | \$ | 16,011.48 | \$ | 21,185.63 | \$ | - | \$ | 95.05 | \$ | 95.05 | 0.5\% |
| 500 | 50 | 182,500 | 500 | 500 | \$ 4,430.00 | \$ | - | \$ | 5,174.15 | \$ | 19,501.79 | \$ | 24,675.94 | \$ | 5,174.15 | \$ | 19,620.60 | \$ | 24,794.75 | \$ |  | \$ | 118.81 | \$ | 118.81 | 0.5\% |
| 500 | 60 | 219,000 | 500 | 500 | \$ 4,430.00 | \$ | - | \$ | 5,174.15 | \$ | 23,087.15 |  | 28,261.30 | \$ | 5,174.15 | \$ | 23,229.72 | \$ | 28,403.87 | \$ | - | \$ | 142.57 | \$ | 142.57 | 0.5\% |
| 500 | 70 | 255,500 | 500 | 500 | \$ 4,430.00 | \$ |  | \$ | 5,174.15 | \$ | 26,672.51 | \$ | 31,846.66 | \$ | 5,174.15 | \$ | 26,838.84 | \$ | 32,012.99 | \$ | - | s | 166.33 | \$ | 166.33 | 0.5\% |
| 500 | 80 | 292,000 | 500 | 500 | \$ 4,430.00 |  | - | \$ | 5,174.15 | \$ | 30,257.87 |  | 35,432.02 | \$ | 5,174.15 | \$ | 30,447.96 | \$ | 35,622.11 | \$ | - | \$ | 190.09 | \$ | 190.09 | 0.5\% |
| 750 | 30 | 164,250 | 750 | 750 | \$ 6,645.00 | \$ | - | \$ | 7,389.15 | \$ | 18,496.61 | \$ | 25,885.76 | \$ | 7,389.15 | \$ | 18,603.54 | \$ | 25,992.69 | \$ | - | \$ | 106.93 | \$ | 106.93 | 0.4\% |
| 750 | 40 | 219,000 | 750 | 750 | \$ 6,645.00 | \$ |  | \$ | 7,389.15 | \$ | 23,874.65 | \$ | 31,263.80 | \$ | 7,389.15 | \$ | 24,017.22 | \$ | 31,406.37 | \$ | - | \$ | 142.57 | \$ | 142.57 | 0.5\% |
| 750 | 50 | 273,750 | 750 | 750 | \$ 6,645.00 | \$ | - | d | 7,389.15 | \$ | 29,252.69 | \$ | 36,641.84 | \$ | 7,389.15 |  | 29,430.90 | s | 36,820.05 | \$ | - | \$ | 178.21 | \$ | 178.21 | 0.5\% |
| 750 | 60 | 328,500 | 750 | 750 | \$ 6,645.00 | \$ |  | \$ | 7,389.15 | \$ | 34,630.73 | \$ | 42,019.88 | \$ | 7,389.15 | \$ | 34,844.58 | \$ | 42,233.73 | \$ |  | \$ | 213.85 | \$ | 213.85 | 0.5\% |
| 750 | 70 | 383,250 | 750 | 750 | \$ 6,645.00 | \$ | - | \$ | 7,389.15 | \$ | 40,008.76 | \$ | 47,397.91 | \$ | 7,389.15 | \$ | 40,258.26 | \$ | 47,647.41 | \$ | - | \$ | 249.50 | \$ | 249.50 | 0.5\% |
| 750 | 80 | 438,000 | 750 | 750 | \$ 6,645.00 | \$ |  | \$ | 7,389.15 | \$ | 45,386.80 | \$ | 52,775.95 | \$ | 7,389.15 | \$ | 45,671.94 | \$ | 53,061.09 | s | - | \$ | 285.14 | \$ | 285.14 | 0.5\% |
| 750 | 90 | 492,750 | 750 | 750 | \$ 6,645.00 | \$ | - | \$ | 7,389.15 | \$ | 50,764.84 | \$ | 58,153.99 | \$ | 7,389.15 | \$ | 51,085.62 | \$ | 58,474.77 | \$ | - | \$ | 320.78 | \$ | 320.78 | 0.6\% |
| 1000 | 30 | 219,000 | 1,000 | 1,000 | \$ 8,860.00 | \$ |  | \$ | 9,604.15 | \$ | 24,662.15 | \$ | 34,266.30 | \$ | 9,604.15 | \$ | 24,804.72 | \$ | 34,408.87 | \$ |  | \$ | 142.57 | \$ | 142.57 | 0.4\% |
| 1000 | 40 | 292,000 | 1,000 | 1,000 | \$ 8,860.00 | \$ | - | \$ | 9,604.15 | \$ | 31,832.87 | \$ | 41,437.02 | \$ | 9,604.15 | \$ | 32,022.96 | \$ | 41,627.11 | \$ | - | \$ | 190.09 | \$ | 190.09 | 0.5\% |
| 1000 | 50 | 365,000 | 1,000 | 1,000 | \$ 8,860.00 | \$ |  | \$ | 9,604.15 | \$ | 39,003.59 | \$ | 48,607.74 | \$ | 9,604.15 | \$ | 39,241.20 | \$ | 48,845.35 | \$ |  | \$ | 237.61 | \$ | 237.61 | 0.5\% |
| 1000 | 60 | 438,000 | 1,000 | 1,000 | \$ 8,860.00 | \$ | - |  | 9,604.15 | \$ | 46,174.30 | \$ | 55,778.45 | \$ | 9,604.15 | \$ | 46,459.44 | \$ | 56,063.59 | \$ | - | \$ | 285.14 | \$ | 285.14 | 0.5\% |
| 1000 | 70 | 511,000 | 1,000 | 1,000 | \$ 8,860.00 | \$ | - | \$ | 9,604.15 | \$ | 53,345.02 | \$ | 62,949.17 | \$ | 9,604.15 | \$ | 53,677.68 | \$ | 63,281.83 | \$ | - | \$ | 332.66 | \$ | 332.66 | 0.5\% |
| 1000 | 80 | 584,000 | 1,000 | 1,000 | \$ 8,860.00 | \$ | - | \$ | 9,604.15 | \$ | 60,515.74 |  | 70,119.89 | \$ | 9,604.15 |  | 60,895.92 | \$ | 70,500.07 | S | - | \$ | 380.18 | \$ | 380.18 | 0.5\% |
| 1000 | 90 | 657,000 | 1,000 | 1,000 | \$ 8,860.00 | \$ | - | \$ | 9,604.15 | \$ | $67,686.45$ |  | 77,290.60 | \$ | 9,604.15 | \$ | 68,114.16 | \$ | 77,718.31 | \$ | S - | \$ | 427.71 | \$ | 427.71 | 0.6\% |
| 2000 | 30 | 438,000 | 2,000 | 2,000 | \$ 17,720.00 | \$ | - | \$ | 18,464.15 | \$ | 49,324.30 | \$ | 67,788.45 | \$ | 18,464.15 | \$ | 49,609.44 | \$ | 68,073.59 | \$ | - | \$ | 285.14 | \$ | 285.14 | 0.4\% |
| 2000 | 40 | 584,000 | 2,000 | 2,000 | \$ 17,720.00 | \$ | - | \$ | 18,464.15 | \$ | 63,665.74 | \$ | 82,129.89 | \$ | 18,464.15 | \$ | 64,045.92 | \$ | 82,510.07 | \$ | - | \$ | 380.18 | \$ | 380.18 | 0.5\% |
| 2000 | 50 | 730,000 | 2,000 | 2,000 | \$ 17,720.00 | \$ | - | \$ | 18,464.15 | \$ | 78,007.17 | \$ | 96,471.32 | \$ | 18,464.15 | \$ | 78,482.40 | \$ | 96,946.55 | S | - | \$ | 475.23 | \$ | 475.23 | 0.5\% |
| 2000 | 60 | 876,000 | 2,000 | 2,000 | \$ 17,720.00 | \$ | - | \$ | 18,464.15 | \$ | 92,348.60 | \$ | 110,812.75 | \$ | 18,464.15 | \$ | 92,918.88 | \$ | 111,383.03 | \$ | - | \$ | 570.28 | \$ | 570.28 | 0.5\% |
| 2000 | 70 | 1,022,000 | 2,000 | 2,000 | \$ 17,720.00 |  | - | \$ | 18,464.15 |  | 106,690.04 |  | 125,154.19 | \$ | 18,464.15 | \$ | 107,355.36 |  | 125,819.51 | S | - | \$ | 665.32 | \$ | 665.32 | 0.5\% |
| 2000 | 80 | 1,168,000 | 2,000 | 2,000 | \$ 17,720.00 | \$ | - | \$ | 18,464.15 | \$ | 121,031.47 | \$ | 139,495.62 | \$ | 18,464.15 | \$ | 121,791.84 | \$ | 140,255.99 | \$ | - | \$ | 760.37 | \$ | 760.37 | 0.5\% |
| 2000 | 90 | 1,314,000 | 2,000 | 2,000 | \$ 17,720.00 | \$ | - | \$ | 18,464.15 | \$ | 135,372.91 | \$ | 153,837.06 | \$ | 18,464.15 | \$ | 136,228.32 | \$ | 154,692.47 | \$ | - |  | 855.41 | \$ | 855.41 | 0.6\% |

vs.


## Schedule (MTN)-3

# ATLANTIC CITY ELECTRIC COMPANY CONSERVATION INCENTIVE PROGRAM EARNINGS TEST APRIL 1, 2019 THROUGH MARCH 30, 2020 TWELVE MONTHS ACTUAL 

in \$ - millions

| 1 | Equity Base for Earnings Test | 1,198 |  |
| :--- | ---: | ---: | :--- |
|  |  |  |  |
| 2 | Allowed ROE | $9.6 \%$ | 2018 Base Rate Case |
| 3 | ROE Limit buffer | $0.5 \%$ | From IIP |
|  | Maximum ROE | $10.1 \%$ | $=\ln 2+\ln 3$ |

## ILLUSTRATIVE PURPOSES ONLY

## Atlantic City Electric Company CIP Recovery Tests

## Allowed Margin

| Residential | $\$ 0$ |
| :--- | :--- |
| MGSS | $\$ 0$ |
| MGSP | $\$ 0$ |
| AGSS | $\$ 0$ |
| AGSP | $\$ 0$ |
| TGST | $\$ 0$ |
| TGS | $\underline{\$ 0}$ |
|  |  |
| Total Variable Margin | $\underline{\underline{\$ 0}}$ |


|  | Actual/ | Number of | Baseline <br> Customer Class | $\underline{\text { Revenue / Cust. }}$ |
| :--- | :--- | :--- | :--- | :--- |

## Residential

| April | a | - | 29.9 | $\$ 0$ |
| :--- | :--- | :--- | :--- | :--- |
| May | a | - | 24.5 | $\$ 0$ |
| June | a | - | 37.4 | $\$ 0$ |
| July | a | - | 60.5 | $\$ 0$ |
| August | a | - | 66.9 | $\$ 0$ |
| September | a | - | 60.3 | $\$ 0$ |
| October | a | - | 33.5 | $\$ 0$ |
| November | a | - | 27.8 | $\$ 0$ |
| December | a | - | 33.5 | $\$ 0$ |
| January | a | - | 43.5 | $\$ 0$ |
| February | a | - | 37.5 | $\$ 0$ |
| March | a | - | 33.4 | $\$ 0$ |
| Total |  |  | 488.8 | $\$ 0$ |


| Customer Class | Actual/ <br> Estimate | Number of <br> Customers | Baseline <br> Revenue / Cust. | Variable <br> Revenue |
| :--- | :---: | :---: | :---: | :---: |
| MGSS |  |  |  |  |
| April |  |  |  |  |
| May | a | - | 107.3 | 97.2 |


| Customer Class | Actual/ <br> Estimate | Number of <br> Customers |
| :--- | :--- | :--- |


| Baseline | Variable |
| :---: | :---: |
| Revenue / Cust. | Revenue |

## AGSS

| April | a |
| :--- | :--- |
| May | a |
| June | a |
| July | a |
| August | a |
| September | a |
| October | a |
| November | a |
| December | a |
| January | a |
| February | a |
| March | a |
| Total |  |


|  | Actual/ |
| :--- | :---: |
| Customer Class | $\underline{E s t i m a t e}$ |

Number of
Customers

| Baseline | Variable |
| :---: | :---: |
| Revenue / Cust. | Revenue |


| AGSP |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
| April | a | - | $6,694.3$ | $\$ 0$ |
| May | a | - | $7,327.3$ | $\$ 0$ |
| June | a | - | $7,521.4$ | $\$ 0$ |
| July | a | - | $8,310.3$ | $\$ 0$ |
| August | a | - | $8,173.3$ | $\$ 0$ |
| September | a | - | $7,432.0$ | $\$ 0$ |
| October | a | - | $7,795.6$ | $\$ 0$ |
| November | a | - | $7,264.1$ | $\$ 0$ |
| December | a | - | $7,203.3$ | $\$ 0$ |
| January | a | - | $7,336.6$ | $\$ 0$ |
| February | a | - | $89,497.6$ | $\$ 0$ |
| March | a | - | $\$ 0$ |  |
| Total |  |  | $\$ 0$ |  |


| Actual/ | Number of <br> Customer Class | $\underline{\text { Eustomers }}$ |
| :--- | :---: | :--- |

TGST

| April | a | - | 7,579.9 |  |
| :---: | :---: | :---: | :---: | :---: |
| May | a | - | 6,715.5 |  |
| June | a | - | 7,390.6 |  |
| July | a | - | 7,166.8 |  |
| August | a | - | 7,988.0 |  |
| September | a | - | 7,743.8 |  |
| October | a | - | 7,149.0 |  |
| November | a | - | 6,586.1 |  |
| December | a | - | 5,895.6 |  |
| January | a | - | 7,247.7 |  |
| February | a | - | 7,362.5 |  |
| March | a | - | 7,494.1 |  |
| Total |  |  | 86,319.6 |  |
| Customer Class | Actual/ <br> Estimate | Number of Customers | Baseline <br> Revenue / Cust. | Variable Revenue |

TGS

| April | a | - | $8,060.2$ | $\$ 0$ |
| :--- | :--- | :--- | :--- | :--- |
| May | a | - | $5,017.3$ | $\$ 0$ |
| June | a | - | $6,108.3$ | $\$ 0$ |
| July | a | - | $6,744.6$ | $\$ 0$ |
| August | a | - | $2,265.3$ | $\$ 0$ |
| September | a | - | $5,539.0$ | $\$ 0$ |
| October | a | - | $3,836.6$ | $\$ 0$ |
| November | a | - | $6,837.9$ | $\$ 0$ |
| December | a | - | $5,513.5$ | $\$ 0$ |
| January | a | - | $11,808.0$ | $\$ 0$ |
| February | a | - | $76,657.0$ | $\$ 0$ |
| March | a |  | $\$ 0$ |  |
| Total |  |  | $\$ 0$ |  |

## ILLUSTRATIVE PURPOSES ONLY

Atlantic City Electric Company
Conservation Incentive Program Filing
April 2019-March 2020
CIP Recovery Tests
Summary

## Determine Weather and Non-Weather CIP Impacts

CIP Residential

|  | Weather |  |  | Non-Weather |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $\$$ | - | $\$$ | - | $\$$ |  | Total |
| $\$$ | - | $\$$ | - | $\$$ |  | - |
|  |  | $\$$ | - | $\$$ |  | - |
|  |  | $\$$ | - | $\$$ |  | - |
|  |  | $\$$ | - | $\$$ |  | - |
|  |  | - | $\$$ | - | $\$$ |  |
| $\$$ | - | $\$$ | - | $\$$ |  | - |

Total Deficiency/(Credit)
\$
\$
\$

Step 2: Apply Modified BGSS Savings Test
A. Non-weather Impact Subject to Modified BGS Savings Test
Non-Weather Impact
$75 \%$ Factor
Subtotal

Prior Year Carry-Forward (Modified BGSS Savings Test)

Non-weather Impact Subject to Test
\$

## B. BGS Savings

Permanent Capacity Savings \$ 9,177,670
Additional Capacity BGS Savings
Avoided Cost BGS Savings
Total BGS Savings

| $\$$ | $9,177,670$ |
| :--- | ---: |
| $\$$ | - |
| $\$$ | $1,736,152$ |
| $\$$ | $\mathbf{1 0 , 9 1 3 , 8 2 2}$ |

## C. Results

Non-Weather Impacts Passing Test (current accrual)
Non-Weather Impacts Passing Test (prior year carry-forward)
Non-Weather Impacts Exceeding Test

| $\$$ | - |
| :--- | :--- |
| $\$$ | - |
| $\$$ | - |

## Atlantic City Electric Company Conservation Incentive Program Filing April 2019-March 2020 <br> CIP Recovery Tests <br> Summary

Step 3: Apply Variable Margin Revenue Test
A. Non-weather Impact Subject to Variable Margin Revenue Test
Non-Weather Impact \$
Prior Year Carry-Forward (Variable Margin Revenue Test) \$
Non-weather Impact Subject to Test \$
B. Variable Margin Revenues
Variable Margin Revenues
6.5\% Factor
Total Fixed Recovery Cap

## C. Results

Non-Weather Impacts Passing Test (current accrual)
Non-Weather Impacts Passing Test (prior year carry-forward)
Non-Weather Impacts Exceeding Test

Step 4: Determine Recoverable Non-Weather CIP Impacts
A. Current Year Accrual Recoverable Non-Weather Impacts

Amount Passing Modified BGSS Savings Test
Amount Passing Variable Margin Revenue Test
Recoverable Amount
B. Previous Carry-Forward Recoverable Amounts

Amount Passing Modified BGSS Savings Test
Amount Passing Variable Margin Revenue Test
Deduction for any amount also included in above

Total Non-Weather Recoverable CIP Amount
\$
\$
\$ $\$ \quad-$
$\qquad$

Atlantic City Electric Company
CIP Recovery Tests
CIP BGS Savings
I. Permanent BGS Savings

| Year | WN Summer <br> Peak | Final Zonal UCAP <br> Obligation | AE Zonal Net Load <br> Price <br> \$/MW-Day | AE Zonal Net <br> Load Price <br> \$/kW-yr |
| :---: | :---: | :---: | :---: | :---: |
| $2009 / 2010$ |  | 2,994 | $\$ 193.70$ | $\$ 70.75$ |
| $2010 / 2011$ |  | 3,008 | $\$ 182.85$ | $\$ 66.79$ |
| $2011 / 2012$ | 2,550 | 2,998 | $\$ 116.15$ | $\$ 42.42$ |
| $2012 / 2013$ | 2,520 | 2,966 | $\$ 143.06$ | $\$ 52.25$ |
| $2013 / 2014$ | 2,590 | 2,610 | 2,993 | $\$ 248.30$ |
| $2014 / 2015$ | 2,460 | 2,767 | $\$ 137.54$ | $\$ 90.69$ |
| $2015 / 2016$ | 2,350 | 2,798 | $\$ 166.53$ | $\$ 50.24$ |
| $2016 / 2017$ | 2,330 | 2,791 | $\$ 163.27$ | $\$ 60.83$ |
| $2017 / 2018$ | $2018 / 2019$ |  | $\$ 153.74$ | $\$ 59.63$ |
| $2019 / 2020$ |  |  | $\$ 218.96$ | $\$ 56.15$ |
| $2020 / 2021$ |  |  | $\$ 115.58$ | $\$ 79.97$ |
|  |  | $\$ 174.32$ | $\$ 42.22$ |  |


| Permanent Capacity Savings | 217 |
| ---: | :---: |
| 2020 AE Zonal Net Load Capacity Cost per kW-year | $\$ 42.22$ |

Total Permanent Reductions
II. Additional Capacity BGS Savings

CIP Recovery

| Year | WN Summer Peak | Final Zona lUCAP <br> Obligation | PS Zonal Net Load <br> Price <br> \$/MW-Day |
| :---: | :---: | :---: | :---: |
| $2019 / 2020$ | 2,330 | 2,791 | $\$ 42.22$ |
| $2020 / 2021^{*}$ | 2,390 | 2,914 | $\$ 63.67$ |

Incremental Capacity Savings* 0
AE Zonal Net Load Capacity Cost per kW-year \$63.67
Total Additional Capacity Reductions
\$

* Due to the potential for Peak increases due to Electric Vehicles and Electrification, incremental savings is set as a minimum of the incremental obligation savings or zero
III. Avoided Capacity

CIP Recovery Year

Annual \$
\$ 1,736,152
VI. Total of all Savings

CIP Recovery Year
Permanent Additional Capacity BGSS Avoided Cost BGSS
2019/2020
Capacity Savings

Savings
Savings 1,736,152 \$

## Atlantic City Electric Company

 CIP Recovery Tests Avoided Capacity Cost BGS Savings|  | Base Year |
| :--- | :---: |
| Month | Customer Count |
| (a) | (b) |


| Residential |  |
| :--- | ---: |
| April | 488,937 |
| May | 489,131 |
| June | 489,132 |
| July | 489,742 |
| August | 490,123 |
| September | 490,093 |
| October | 490,441 |
| November | 490,672 |
| December | 491,047 |
| January | 488,456 |
| February | 488,582 |
| March | 488,937 |
| Subtotal | $1,877,882$ |


| MGSS |  |
| :--- | ---: |
| April | 50,703 |
| May | 50,966 |
| June | 51,252 |
| July | 50,850 |
| August | 51,616 |
| September | 50,396 |
| October | 51,822 |
| November | 49,244 |
| December | 50,416 |
| January | 50,467 |
| February | 50,331 |
| March | 50,140 |
| Subtotal | 12,158 |


| MGSP |  |
| :--- | ---: |
| April | 90 |
| May | 94 |
| June | 92 |
| July | 92 |
| August | 97 |
| September | 93 |
| October | 96 |
| November | 99 |
| December | 103 |
| January | 90 |
| February | 92 |
| March | 93 |
| Subtotal | 261,946 |

Current Year
Customer Count
(c)

| Net Increase/ |  |
| :---: | :---: |
| (Decrease) | B |
|  | C |
|  |  |


| Base Year | Current Year | Avoided |
| :---: | :---: | :---: |
| Unforced |  |  |
| Capacity / | Capacity Rate / |  |
| Customer | Cust. |  |
| $(\mathrm{kW})$ | $(\$ / \mathrm{kW})$ | Capacity |
|  |  | $(\mathrm{g})=(\mathrm{d}) *(\mathrm{e}) *(\mathrm{f})$ |
| $(\mathrm{e})$ | $(\mathrm{f})$ | $* 1,000$ |

$(\mathrm{d})=(\mathrm{b}) /(\mathrm{c})$
(e)
(f)

* 1,000

| 3.02 | $\$ 3.52$ | 34,962 |
| :--- | ---: | ---: |
| 3.02 | $\$ 3.52$ | 38,285 |
| 3.02 | $\$ 3.52$ | 41,166 |
| 3.02 | $\$ 3.52$ | 38,779 |
| 3.02 | $\$ 3.52$ | 36,999 |
| 3.02 | $\$ 3.52$ | 39,388 |
| 3.01 | $\$ 3.52$ | 37,430 |
| 3.01 | $\$ 3.52$ | 39,203 |
| 3.01 | $\$ 3.52$ | 38,549 |
| 3.03 | $\$ 3.52$ | 70,130 |
| 3.02 | $\$ 3.52$ | 71,655 |
| 3.02 | $\$ 3.52$ | 69,976 |
|  |  | 556,522 |


| AGSS |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| April | 3,437 | 3,312 | (125) | 126.48 | \$3.52 | $(55,621)$ |
| May | 3,428 | 3,297 | (131) | 126.82 | \$3.52 | $(58,444)$ |
| June | 3,419 | 3,289 | (130) | 127.15 | \$3.52 | $(58,151)$ |
| July | 3,421 | 3,278 | (143) | 127.08 | \$3.52 | $(63,928)$ |
| August | 3,417 | 3,273 | (144) | 127.23 | \$3.52 | $(64,451)$ |
| September | 3,396 | 3,244 | (152) | 128.01 | \$3.52 | $(68,452)$ |
| October | 3,357 | 3,232 | (125) | 129.50 | \$3.52 | $(56,947)$ |
| November | 3,354 | 3,226 | (128) | 129.61 | \$3.52 | $(58,366)$ |
| December | 3,343 | 3,218 | (125) | 130.04 | \$3.52 | $(57,185)$ |
| January | 3,464 | 3,209 | (255) | 125.50 | \$3.52 | $(112,583)$ |
| February | 3,457 | 3,195 | (262) | 125.75 | \$3.52 | $(115,908)$ |
| March | 3,441 | 3,183 | (258) | 126.34 | \$3.52 | $(114,669)$ |
| Subtotal | 8,645 | 3,246 | (165) |  |  | $(\underline{\underline{\$ 84,703}})$ |
| AGSP |  |  |  |  |  |  |
| April | 125 | 127 | 2 | 834.55 | \$3.52 | 5,872 |
| May | 126 | 127 | 1 | 827.93 | \$3.52 | 2,913 |
| June | 126 | 127 | 1 | 827.93 | \$3.52 | 2,913 |
| July | 126 | 127 | 1 | 827.93 | \$3.52 | 2,913 |
| August | 125 | 127 | 2 | 834.55 | \$3.52 | 5,872 |
| September | 125 | 124 | (1) | 834.55 | \$3.52 | $(2,936)$ |
| October | 125 | 124 | (1) | 834.55 | \$3.52 | $(2,936)$ |
| November | 125 | 125 | - | 834.55 | \$3.52 | - |
| December | 125 | 125 | - | 834.55 | \$3.52 | - |
| January | 123 | 125 | 2 | 848.12 | \$3.52 | 5,967 |
| February | 123 | 123 | - | 848.12 | \$3.52 | - |
| March | 124 | 123 | (1) | 841.28 | \$3.52 | $(2,960)$ |
| Subtotal | 8,645 | 125 | 1 |  |  | 17,618 |
| TGST |  |  |  |  |  |  |
| April | 36 | 37 | 1 | 2,667.76 | \$3.52 | 9,385 |
| May | 36 | 37 | 1 | 2,667.76 | \$3.52 | 9,385 |
| June | 36 | 37 | 1 | 2,667.76 | \$3.52 | 9,385 |
| July | 36 | 37 | 1 | 2,667.76 | \$3.52 | 9,385 |
| August | 35 | 38 | 3 | 2,743.98 | \$3.52 | 28,960 |
| September | 36 | 38 | 2 | 2,667.76 | \$3.52 | 18,770 |
| October | 38 | 38 | - | 2,527.35 | \$3.52 | - |
| November | 37 | 38 | 1 | 2,595.66 | \$3.52 | 9,131 |
| December | 37 | 37 | - | 2,595.66 | \$3.52 | - |
| January | 36 | 37 | 1 | 2,667.76 | \$3.52 | 9,385 |
| February | 36 | 37 | 1 | 2,667.76 | \$3.52 | 9,385 |
| March | 32 | 37 | 5 | 3,001.23 | \$3.52 | 52,791 |
| Subtotal | 8,645 | 37 | 1 |  |  | \$165,963 |
| TGS |  |  |  |  |  |  |
| April | 14 | 16 | 2 | 3,366.03 | \$3.52 | 23,683 |
| May | 17 | 16 | (1) | 2,772.03 | \$3.52 | $(9,752)$ |
| June | 16 | 16 | - | 2,945.28 | \$3.52 | - |
| July | 15 | 16 | 1 | 3,141.63 | \$3.52 | 11,052 |
| August | 16 | 16 | - | 2,945.28 | \$3.52 | - |
| September | 16 | 16 | - | 2,945.28 | \$3.52 | - |
| October | 16 | 16 | - | 2,945.28 | \$3.52 | - |
| November | 16 | 16 | - | 2,945.28 | \$3.52 | - |
| December | 15 | 16 | 1 | 3,141.63 | \$3.52 | 11,052 |
| January | 16 | 16 | - | 2,945.28 | \$3.52 | - |
| February | 16 | 16 | - | 2,945.28 | \$3.52 | - |
| March | 10 | 16 | 6 | 4,712.45 | \$3.52 | 99,469 |
| Subtotal | 8,645 | 16 | 1 |  |  | \$135,505 |
|  |  |  | Total Avoided Capacity Cost BGS Savings |  |  | \$1,736,152 |

Notes:
(1) Base Year Customer Count is equal to the test year customer count used to set base rates in a base rate case
(2) Current Year Customer Count is equal to the customer count in the CIP accrual year.
(3) Base Year Unforced capacity is equal to the 2017/2018 Unforced capacity from PJM by rate schedule divided by number of customers
(4) Current Year Capacity rate is the current year PS Zonal Net Load Price $\$ / \mathrm{kW}$-yr divided by 12

## ILLUSTRATIVE PURPOSES ONLY

Actual Sales (MWh)

|  | RES (MWh) | $\begin{aligned} & \text { RSH } \\ & \text { (MWh) } \end{aligned}$ | $\begin{aligned} & \text { COM } \\ & \text { (MWh) } \end{aligned}$ | $\begin{aligned} & \text { IND } \\ & \text { (MWh) } \end{aligned}$ | $\begin{aligned} & \text { PSL } \\ & \text { (MWh) } \end{aligned}$ | Total (MWh) | RES (MWh) | $\begin{aligned} & \text { RSH } \\ & \text { (MWh) } \end{aligned}$ | $\begin{aligned} & \text { COM } \\ & \text { (MWh) } \end{aligned}$ | $\begin{aligned} & \text { IND } \\ & \text { (MWh) } \end{aligned}$ | $\begin{aligned} & \text { PSL } \\ & \text { (MWh) } \end{aligned}$ | Total (MWh) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Apr-19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| May-19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Jun-19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Jul-19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Aug-19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |  | 0 | 0 |
| Sep-19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Oct-19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Nov-19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Dec-19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Jan-20 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Feb-20 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Mar-20 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Weather Normalization Adjustment (MWh)

| RES (MWh) | RSH (MWh) | COM <br> (MWh) | $\begin{aligned} & \text { IND } \\ & \text { (MWh) } \end{aligned}$ | $\begin{aligned} & \text { PSL } \\ & \text { (MWh) } \end{aligned}$ | Total (MWh) | RES <br> (\%) | RSH <br> (\%) | $\begin{gathered} \text { COM } \\ \text { (\%) } \end{gathered}$ | IND <br> (\%) | $\begin{gathered} \text { PSL } \\ \text { (\%) } \end{gathered}$ | Total (\%) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| 0 | 0 | 0 | 0 | 0 | 0 | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
|  | 0 |  |  |  |  | 0.00\% |  |  |  |  |  |

## Average Rate / kWh (\$)

| RES <br> $\mathbf{( \$ )}$ | RSH <br> $\mathbf{( \$ )}$ | COM <br> $\mathbf{( \$ )}$ | IND <br> $\mathbf{( \$ )}$ | PSL <br> $\mathbf{( \$ )}$ |
| :---: | :---: | :---: | :---: | :---: |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
| 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 | 0.0000000 |
|  |  |  |  |  |
| $\mathbf{0 . 0 0 0 0 0 0 0}$ | $\mathbf{0 . 0 0 0 0 0 0 0}$ | $\mathbf{0 . 0 0 0 0 0 0 0}$ | $\mathbf{0 . 0 0 0 0 0 0 0}$ | $\mathbf{0 . 0 0 0 0 0 0 0}$ |

## Weather Normalized Revenue Adjustment (\$)

| RES <br> (\$) | RSH <br> (\$) | COM <br> (\$) | IND (\$) | $\begin{gathered} \text { PSL } \\ \text { (\$) } \end{gathered}$ | Total <br> (\$) |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 | 0 | 0 |

## ILLUSTRATIVE PURPOSES ONLY

Atlantic City Electric Company
Conservation Incentive Program
Residential Service
April 2019 - March 2020


Margin Deficiency/ (Credit)
Prior Period (Over) / Under Recovery

Total Deficiency/(Credit)

Projected Residential kWh Use
Pre-tax CIP Charge/(Credit) per kWh
$\qquad$
\$

BPU/RC Assessment Factor

| 0 |
| ---: |
| $\square$ |

CIP Charge/(Credit) including assessments
6.625\% Sales Tax
\$
\$
Proposed After-tax CIP Charge/(Credit) per kWh

Current After-tax CIP Charge/(Credit) per kWh

Increase/ (Decrease) in After-tax CIP Charge/(Credit) per kWh
\$
\$
\$
nussamene eneosess oury



## ILLUSTRATVE PURPOSES ONLY

Atlantic City Electric Company

| Customers and Sales |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Residential |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | $\begin{aligned} & \text { Actual } \\ & \text { Jan-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Feb-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Mar-18 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Apr-18 } \end{aligned}$ | $\begin{gathered} \text { Actual } \\ \text { May-18- } \end{gathered}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jun-1 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jul-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Aug-18 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Sep-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Oct-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Nov-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Dec-18 } \end{aligned}$ |  |
| Volumes |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| RS kWh - Summer < 750 |  | - | - | - | - | - | 165,570,705 | 273,904,651 | 279,901,807 | 262,988,953 | 59,768,378 |  |  |  |
| RS kWh - Summer > 750 |  | - | - | - | - | - | 52,274,745 | 179,384,586 | 218,501,771 | 187,212,144 | 21,672,072 | - | - |  |
| RS kWh - Winter |  | 378,260,037 | 326,053,646 | 290,560,241 | 259,808,643 | 213,060,034 | 78,461,832 | $\square$ | $-$ | $\bigcirc$ | 199,915,639 | 242,745,725 | 293,108,277 |  |
| Rates (pre-tax) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| SUM 'First 750 KWh |  | 0.061399 | 0.061399 | 0.061399 | 0.061399 | 0.061399 | 0.061399 | 0.061399 | 0.061399 | 0.061399 | 0.061399 | 0.061399 | 0.061399 |  |
| sum '> 750 KWh |  | 0.071476 | 0.071476 | 0.071476 | 0.071476 | 0.071476 | 0.071476 | 0.071476 | 0.071476 | 0.071476 | 0.071476 | 0.071476 | 0.071476 |  |
| wiv |  | 0.056192 | 0.056192 | 0.056192 | 0.056192 | 0.056192 | 0.056192 | 0.056192 | 0.056192 | 0.056192 | 0.056192 | 0.056192 | 0.056192 |  |
|  | Total Volume | 378,260,037 | 326,053,646 | 290,560,241 | 259,808,643 | 213,060,034 | 296,307,282 | 453,289,237 | 498,403,578 | 450,201,097 | 281,356,088 | 242,745,725 | 293,108,277 | 3,983,153,885 |
| Revenues |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Volume Charge Revenues |  | 21,255,188 | 18,321,606 | 16,327,161 | 14,599,167 | 11,972,269 | 18,311,193 | 29,639,164 | 32,803,324 | 29,528,434 | 16,452,411 | 13,640,368 | 16,470,340 | 239,320,626 |
| Demand Charge Revenues |  | - | . | - | - | - | - | - | - | - | - | - | - | - |
|  | Total Revenue | 21,255,188 | 18,321,606 | 16,327,161 | 14,599,167 | 11,972,269 | 18,311,193 | 29,639,164 | 32,803,324 | 29,528,434 | 16,452,411 | 13,640,368 | 16,470,340 | 239,320,626 |
| Customers |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Total Customers | 488,192 | 488,456 | 488,582 | 488,937 | 489,131 | 489,132 | 489,742 | 490,123 | 490,093 | 490,441 | 490,672 | 491,047 | 5,874,548 |
|  | Baseline | 43.54 | 37.51 | 33.42 | 29.86 | 24.48 | 37.44 | 60.52 | 66.93 | 60.25 | 33.55 | 27.80 | 33.54 | 40.74 |

ulLustrative purposes only

|  | Atlantic City Electric Company Statement of Estimated Under/(Over) Recovered CIP Balance Residential Service Twelve Months Ending March 2020 |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{aligned} & \text { Actual } \\ & \text { Apr-19 } \end{aligned}$ | $\begin{gathered} \text { Actual } \\ \text { May-19 } \end{gathered}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jun-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jul-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Aug-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Sep-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Oct-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Nov-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Dec-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jan-20 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Feb-20 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Mar-2 } \end{aligned}$ | TOTAL |  |
| Beginning Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| kWh Sales | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| Pre-tax Recovery Rate per $\mathrm{kWh}{ }^{1}$ | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |  |  |
| Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| Ending Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |

${ }^{1}$ Pre-tax Recovery Rate per kwh excluding BPU and RC assessments.

## ILLUSTRATIVE PURPOSES ONLY

> Atlantic City Electric Company
> Conservation Incentive Program
> Medium General Service - Secondary (MGSS)
> April 2019 - March 2020

|  | Actual/ <br> Estimate | Actual per Books |  |  | Actual Avg. <br> Revenue / Cust. |  | Baseline |  | Difference |  | Margin <br> Variance |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Customer Class <br> (a) |  |  | Total Class <br> Revenues <br> (b) | Number of Customers <br> (c) |  |  |  | eline $\text { e / Cust. }{ }^{1}$ <br> e) |  |  |  |
| Residential |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Apr-19 | a | \$ | - | - |  | 0 | \$ | 107.30 | \$ | (107.30) |  | \$0 |
| May-19 | a | \$ | - | - |  | 0 | \$ | 97.24 | \$ | (97.24) |  | \$0 |
| Jun-19 | a | \$ | - | - |  | 0 | \$ | 128.49 | \$ | (128.49) |  | \$0 |
| Jul-19 | a | \$ | - | - |  | 0 | \$ | 167.19 | \$ | (167.19) |  | \$0 |
| Aug-19 | a | \$ | - | - |  | 0 | \$ | 173.20 | \$ | (173.20) |  | \$0 |
| Sep-19 | a | \$ | - | - |  | 0 | \$ | 172.12 | \$ | (172.12) |  | \$0 |
| Oct-19 | a | \$ | - | - |  | 0 | \$ | 122.10 | \$ | (122.10) |  | \$0 |
| Nov-19 | a | \$ | - | - |  | 0 | \$ | 96.53 | \$ | (96.53) |  | \$0 |
| Dec-19 | a | \$ | - | - |  | 0 | \$ | 97.13 | \$ | (97.13) |  | \$0 |
| Jan-20 | a | \$ | - | - |  | 0 | \$ | 122.16 | \$ | (122.16) |  | \$0 |
| Feb-20 | a | \$ | - | - |  | 0 | \$ | 108.34 | \$ | (108.34) |  | \$0 |
| Mar-20 | a | \$ | - | - |  | 0 | \$ | 102.71 | \$ | (102.71) |  | \$ |
| Total |  | \$ | - |  | \$ | - | \$ | 1,494.52 | \$ | $(1,494.52)$ |  | \$0 |

Margin Deficiency/ (Credit)
Prior Period (Over) / Under Recovery

Total Deficiency/(Credit)

\$

Projected MGSS KW Use

Pre-tax CIP Charge/(Credit) per KW
BPU/RC Assessment Factor

CIP Charge/(Credit) including assessments 6.625\% Sales Tax
\$ $\qquad$
Proposed After-tax CIP Charge/(Credit) per kW

Current After-tax CIP Charge/(Credit) per kWh

Increase/ (Decrease) in After-tax CIP Charge/(Credit) per kW

## \$

\$
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${ }^{1}$ From latest base rate adjustment divided by billing determinants approved in the 2018 Base Rate Case
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Atlantic City Electric Company

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|  | Atlantic City Electric Company Statement of Estimated Under/(Over) Recovered CIP Balance Medium General Service - Secondary (MGSS) Twelve Months Ending March 2020 |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{aligned} & \text { Actual } \\ & \text { Apr-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { May-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jun-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jul-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Aug-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Sep-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Oct-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Nov-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Dec-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jan-20 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Feb-20 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Mar-20 } \\ & \hline \end{aligned}$ | TOTAL |  |
| Beginning Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| KW Demand | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| Pre-tax Recovery Rate per $\mathrm{KW}^{1}$ | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |  |  |
| Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| Ending Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |

${ }^{1}$ Pre-tax Recovery Rate per demand excluding BPU and RC assessments.

## ILLUSTRATIVE PURPOSES ONLY

Atlantic City Electric Company
Conservation Incentive Program Medium General Service - Primary (MGSP)

April 2019 - March 2020

| Customer Class | Actual/ <br> Estimate | Actual per Books |  |  | Actual Avg. <br> Revenue / Cust. |  |  | Difference |  | Margin <br> Variance |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Total Class <br> Revenues <br> (b) | Number of Customers <br> (c) |  |  | Baseline Revenue / Cust. <br> (e) |  |  |  |
| Residential |  |  |  |  |  |  |  |  |  |  |  |  |
| Apr-19 | a | \$ | - | - | 0 | \$ | 1,304.15 | \$ | $(1,304.15)$ |  | \$0 |
| May-19 | a | \$ | - | - | 0 | \$ | 985.59 | \$ | (985.59) |  | \$0 |
| Jun-19 | a | \$ | - | - | 0 | \$ | 1,263.62 | \$ | $(1,263.62)$ |  | \$0 |
| Jul-19 | a | \$ | - | - | 0 | \$ | 1,507.13 | \$ | $(1,507.13)$ |  | \$0 |
| Aug-19 | a | \$ | - | - | 0 | \$ | 1,753.07 | \$ | $(1,753.07)$ |  | \$0 |
| Sep-19 | a | \$ | - | - | 0 | \$ | 1,368.24 | \$ | $(1,368.24)$ |  | \$0 |
| Oct-19 | a | \$ | - | - | 0 | \$ | 1,137.24 | \$ | $(1,137.24)$ |  | \$0 |
| Nov-19 | a | \$ | - | - | 0 | \$ | 1,348.09 | \$ | $(1,348.09)$ |  | \$0 |
| Dec-19 | a | \$ | - | - | 0 | \$ | 842.17 | \$ | (842.17) |  | \$0 |
| Jan-20 | a | \$ | - | - | 0 | \$ | 973.18 | \$ | (973.18) |  | \$0 |
| Feb-20 | a | \$ | - | - | 0 | \$ | 1,970.30 | \$ | (1,970.30) |  | \$0 |
| Mar-20 | a | \$ | - | - | 0 | \$ | 1,790.77 | \$ | $(1,790.77)$ |  | \$0 |
| Total |  | \$ | - |  | \$ | \$ | 16,243.56 | \$ | $(16,243.56)$ |  | \$0 |

Margin Deficiency/ (Credit)
Prior Period (Over) / Under Recovery

Total Deficiency/(Credit)

\$

| 0 |
| ---: |
| 1.002569 |

\$
$\qquad$ $-$

## \$

\$
\$
$\qquad$

CIP Charge/(Credit) including assessments 6.625\% Sales Tax

Proposed After-tax CIP Charge/(Credit) per KW

Current After-tax CIP Charge/(Credit) per KW

Increase/ (Decrease) in After-tax CIP Charge/(Credit) per KW

Projected MGSP KW Use

Pre-tax CIP Charge/(Credit) per KW
${ }^{1}$ From latest base rate adjustment divided by billing determinants approved in the 2018 Base Rate Case
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|  | Atlantic City Electric Company Statement of Estimated Under/(Over) Recovered CIP Balance Medium General Service - Primary (MGSP) Twelve Months Ending March 2020 |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{aligned} & \text { Actual } \\ & \text { Apr-19 } \end{aligned}$ | $\begin{gathered} \text { Actual } \\ \text { May-19 } \end{gathered}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jun-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jul-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Aug-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Sep-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Oct-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Nov-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Dec-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jan-20 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Feb-20 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Mar-20 } \\ & \hline \end{aligned}$ | TOTAL |  |
| Beginning Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| KW Demand | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| Pre-tax Recovery Rate per $\mathrm{KW}^{1}$ | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |  |  |
| Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| Ending Under(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |

Pre-tax Recovery Rate per demand excluding BPU and RC assessments.

## ILLUSTRATIVE PURPOSES ONLY

Atlantic City Electric Company
Conservation Incentive Program
Annual General Service - Secondary (AGSS)
April 2019 - March 2020

|  | Actual/ <br> Estimate | Actual per Books |  |  | Actual Avg. <br> Revenue / Cust. |  | Baseline |  | Difference |  | Margin <br> Variance |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Customer Class <br> (a) |  |  | Total Class <br> Revenues <br> (b) | Number of Customers <br> (c) |  |  |  | seline <br> ue / Cust. ${ }^{1}$ <br> (e) |  |  |  |
| Residential |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Apr-19 | a | \$ | - | - |  | 0 | \$ | 1,316.74 | \$ | $(1,316.74)$ |  | \$0 |
| May-19 | a | \$ | - | - |  | 0 | \$ | 1,322.62 | \$ | $(1,322.62)$ |  | \$0 |
| Jun-19 | a | \$ | - | - |  | 0 | \$ | 1,470.24 | \$ | $(1,470.24)$ |  | \$0 |
| Jul-19 | a | \$ | - | - |  | 0 | \$ | 1,424.81 | \$ | $(1,424.81)$ |  | \$0 |
| Aug-19 | a | \$ | - | - |  | 0 | \$ | 1,477.15 | \$ | $(1,477.15)$ |  | \$0 |
| Sep-19 | a | \$ | - | - |  | 0 | \$ | 1,524.55 | \$ | $(1,524.55)$ |  | \$0 |
| Oct-19 | a | \$ | - | - |  | 0 | \$ | 1,349.45 | \$ | $(1,349.45)$ |  | \$0 |
| Nov-19 | a | \$ | - | - |  | 0 | \$ | 1,286.00 | \$ | $(1,286.00)$ |  | \$0 |
| Dec-19 | a | \$ | - | - |  | 0 | \$ | 1,264.24 | \$ | $(1,264.24)$ |  | \$0 |
| Jan-20 | a | \$ | - | - |  | 0 | \$ | 1,471.74 | \$ | $(1,471.74)$ |  | \$0 |
| Feb-20 | a | \$ | - | - |  | 0 | \$ | 1,308.11 | \$ | $(1,308.11)$ |  | \$0 |
| Mar-20 | a | \$ | - | - |  | 0 | \$ | 1,338.73 | \$ | (1,338.73) |  | \$ |
| Total |  | \$ | - |  | \$ | - | \$ | 16,554.38 | \$ | $(16,554.38)$ |  | \$0 |

Margin Deficiency/ (Credit)
Prior Period (Over) / Under Recovery

Total Deficiency/(Credit)

\$

| 0 |
| ---: |
| 1.002569 |

\$
$\qquad$
\$
\$
\$ .
\$ $-$

CIP Charge/(Credit) including assessments 6.625\% Sales Tax

Proposed After-tax CIP Charge/(Credit) per KW

Current After-tax CIP Charge/(Credit) per KW

Increase/ (Decrease) in After-tax CIP Charge/(Credit) per KW
${ }^{1}$ From latest base rate adjustment divided by billing determinants approved in the 2018 Base Rate Case
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Atlantic City Electric Company
Customers, Demand, Sales

|  |  | $\begin{aligned} & \text { Actual } \\ & \text { Jan-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Feb-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Mar-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Apr-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { May-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jun-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jul-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Aug-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Sep-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Oct-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Nov-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Dec-18 } \end{aligned}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Volumes |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Summer/Winter kwh |  | 155,960,652 | 150,972,544 | 153,700,065 | 136,238,565 | 141,535,232 | 163,211,730 | 169,337,544 | 179,128,658 | 180,053,317 | 153,707,569 | 152,082,467 | 146,400,188 |  |
|  | Total Volume | 155,960,652 | 150,972,544 | 153,700,065 | 136,238,565 | 141,535,232 | 163,211,730 | 169,337,544 | 179,128,658 | 180,053,317 | 153,707,569 | 152,082,467 | 146,400,188 | $\underline{1,882,328,532}$ |
| Demand |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Summer/Winter KW |  | 490,905 | 435,444 | 443,575 | 435,782 | 436,580 | 484,035 | 469,352 | 486,025 | 498,538 | 436,210 | 415,331 | 406,963 |  |
|  | Total Demand | 490,905 | 435,444 | 443,575 | 435,782 | 436,580 | 484,035 | 469,352 | 486,025 | 498,538 | 436,210 | 415,331 | 406,963 | 5,438,743 |
| Rates (pre-tax) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Summer/Winter kwh |  | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |  |
| Summer/Winter KW |  | 10.39 | 10.39 | 10.39 | 10.39 | 10.39 | 10.39 | 10.39 | 10.39 | 10.39 | 10.39 | 10.39 | 10.39 |  |
| Revenues |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Volume Charge Revenues |  | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Demand Charge Revenues |  | 5,098,102 | 4,522,133 | 4,606,575 | 4,525,639 | 4,533,928 | 5,026,752 | 4,874,271 | 5,047,423 | 5,177,371 | 4,530,087 | 4,313,257 | 4,226,355 | 56,481,894 |
|  | Total Revenue | 5,098,102 | 4,522,133 | 4,606,575 | 4,525,639 | 4,533,928 | 5,026,752 | 4,874,271 | 5,047,423 | 5,177,371 | 4,530,087 | 4,313,257 | 4,226,355 | 56,481,894 |
| Customers |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Total Customers | 3,464 | 3,457 | 3,441 | 3,437 | 3,428 | 3,419 | 3,421 | 3,417 | 3,396 | 3,357 | 3,354 | 3,343 | 40,934 |
|  | Baseline | 1,471.74 | 1,308.11 | 1,338.73 | 1,316.74 | 1,322.62 | 1,470.24 | 1,424.81 | 1,477.15 | 1,524.55 | 1,349.45 | 1,286.00 | 1,264.24 | 1,379.83 |

ulLustrative purposes only

|  | Atlantic City Electric Company Statement of Estimated Under/(Over) Recovered CIP Balance Annual General Service - Secondary (AGSS) Twelve Months Ending March 2020 |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{aligned} & \text { Actual } \\ & \text { Apr-19 } \end{aligned}$ | $\begin{gathered} \text { Actual } \\ \text { May-19 } \end{gathered}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jun-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jul-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Aug-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Sep-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Oct-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Nov-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Dec-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jan-20 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Feb-20 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Mar-20 } \end{aligned}$ | TOTAL |  |
| Beginning Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| KW Demand | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| Pre-tax Recovery Rate per $\mathrm{KW}^{1}$ | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |  |  |
| Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |
| Ending Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 |

Pre-tax Recovery Rate per demand excluding BPU and RC assessments.

## ILLUSTRATIVE PURPOSES ONLY

Atlantic City Electric Company
Conservation Incentive Program
Annual General Service - Primary (AGSP)
April 2019 - March 2020

| Customer Class | Actual/ <br> Estimate | Actual per Books |  |  | Actual Avg. <br> Revenue / Cust. |  | Baseline |  | Difference |  | Margin <br> Variance |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Total Class <br> Revenues | Number of Customers |  |  |  | seline <br> e / Cust. ${ }^{1}$ <br> (e) |  |  |  |
| Residential |  |  |  |  |  |  |  |  |  |  |  |  |
| Apr-19 | a | \$ | - | - |  | 0 | \$ | 6,694.28 | \$ | $(6,694.28)$ |  |  | \$0 |
| May-19 | a | \$ | - | - |  | 0 | \$ | 7,327.29 | \$ | (7,327.29) |  | \$0 |
| Jun-19 | a | \$ | - | - |  | 0 | \$ | 7,521.45 | \$ | $(7,521.45)$ |  | \$0 |
| Jul-19 | a | \$ | - | - |  | 0 | \$ | 7,684.82 | \$ | $(7,684.82)$ |  | \$0 |
| Aug-19 | a | \$ | - | - |  | 0 | \$ | 8,310.29 | \$ | $(8,310.29)$ |  | \$0 |
| Sep-19 | a | \$ | - | - |  | 0 | \$ | 8,173.31 |  | $(8,173.31)$ |  | \$0 |
| Oct-19 | a | \$ | - | - |  | 0 | \$ | 7,431.95 | \$ | $(7,431.95)$ |  | \$0 |
| Nov-19 | a | \$ | - | - |  | 0 | \$ | 7,795.57 | \$ | $(7,795.57)$ |  | \$0 |
| Dec-19 | a | \$ | - | - |  | 0 | \$ | 6,264.09 | \$ | $(6,264.09)$ |  | \$0 |
| Jan-20 | a | \$ | - | - |  | 0 | \$ | 7,203.29 | \$ | $(7,203.29)$ |  | \$0 |
| Feb-20 | a | \$ | - | - |  | 0 | \$ | 7,756.64 | \$ | $(7,756.64)$ |  | \$0 |
| Mar-20 | a | \$ | - | - |  | 0 | \$ | 7,334.61 | \$ | $(7,334.61)$ |  | \$0 |
| Total |  | \$ | - |  | \$ | - | \$ | 89,497.59 |  | $(89,497.59)$ |  | \$0 |

Margin Deficiency/ (Credit)
Prior Period (Over) / Under Recovery

Total Deficiency/(Credit)

## \$


\$

| 0 |
| ---: |
| 1.002569 |

\$
$\qquad$ -
$\qquad$
\$

CIP Charge/(Credit) including assessments 6.625\% Sales Tax

Proposed After-tax CIP Charge/(Credit) per KW
Current After-tax CIP Charge/(Credit) per KW

Increase/ (Decrease) in After-tax CIP Charge/(Credit) per KW

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## ILLUSTRATIVE PURPOSES ONL

Atlantic City Electric Company
Customers, Demand, Sales


ulLustrative purposes only

|  | Atlantic City Electric Company Statement of Estimated Under/(Over) Recovered CIP Balance Annual General Service - Primary (AGSP) Twelve Months Ending March 2020 |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{aligned} & \text { Actual } \\ & \text { Apr-19 } \end{aligned}$ | $\begin{array}{r} \text { Actual } \\ \text { May-19 } \\ \hline \end{array}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jun-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jul-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Aug-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Sep-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Oct-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Nov-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Dec-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jan-20 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Feb-20 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Mar-20 } \\ & \hline \end{aligned}$ | TOTAL |
| Beginning Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Kw Demand | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Pre-tax Recovery Rate per $\mathrm{KW}^{1}$ | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |  |
| Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Ending Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Pre-tax Recovery Rate per demand excluding BPU and RC assessments.

## ILLUSTRATIVE PURPOSES ONLY

Atlantic City Electric Company
Conservation Incentive Program
Transmission General Service - Subtransmission (TGST)
April 2019 - March 2020


Margin Deficiency/ (Credit)
Prior Period (Over) / Under Recovery

Total Deficiency/(Credit)
$\qquad$
\$

Projected TGST KW Use

Pre-tax CIP Charge/(Credit) per KW
BPU/RC Assessment Factor

CIP Charge/(Credit) including assessments 6.625\% Sales Tax
\$

Proposed After-tax CIP Charge/(Credit) per KW

Current After-tax CIP Charge/(Credit) per KW

Increase/ (Decrease) in After-tax CIP Charge/(Credit) per KW

## \$

\$
\$
${ }^{1}$ From latest base rate adjustment divided by billing determinants approved in the 2018 Base Rate Case
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|  | Atlantic City Electric Company <br> Statement of Estimated Under/(Over) Recovered CIP Balance Transmission General Service - Subtransmission (TGST) Twelve Months Ending March 2020 |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{aligned} & \text { Actual } \\ & \text { Apr-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { May-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jun-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jul-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Aug-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Sep-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Oct-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Nov-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Dec-19 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jan-20 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Feb-20 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Mar-20 } \end{aligned}$ | TOTAL |
| Beginning Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| KW Demand | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Pre-tax Recovery Rate per $\mathrm{KW}^{1}$ | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |  |
| Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Ending Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Pre-tax Recovery Rate per demand excluding BPU and RC assessments.

## ILLUSTRATIVE PURPOSES ONLY

Atlantic City Electric Company
Conservation Incentive Program
Transmission General Service (TGS)
April 2019 - March 2020

|  | Actual/ <br> Estimate | Actual per Books |  |  | Actual Avg. <br> Revenue / Cust. |  |  | Difference |  | Margin <br> Variance |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Customer Class <br> (a) |  |  | Total Class <br> Revenues <br> (b) | Number of Customers <br> (c) |  |  | Baseline Revenue / Cust. ${ }^{1}$ <br> (e) |  |  |  |
| Residential |  |  |  |  |  |  |  |  |  |  |  |  |
| Apr-19 | a | \$ | - | - | 0 | \$ | 8,060.20 | \$ | $(8,060.20)$ |  | \$0 |
| May-19 | a | \$ | - | - | 0 | \$ | 5,017.35 | \$ | $(5,017.35)$ |  | \$0 |
| Jun-19 | a | \$ | - | - | 0 | \$ | 6,108.30 | \$ | $(6,108.30)$ |  | \$0 |
| Jul-19 | a | \$ | - | - | 0 | \$ | 6,744.60 | \$ | $(6,744.60)$ |  | \$0 |
| Aug-19 | a | \$ | - | - | 0 | \$ | 9,265.32 | \$ | (9,265.32) |  | \$0 |
| Sep-19 | a | \$ | - | - | 0 | \$ | 2,489.03 | \$ | $(2,489.03)$ |  | \$0 |
| Oct-19 | a | \$ | - | - | 0 | \$ | 5,535.19 | \$ | $(5,535.19)$ |  | \$0 |
| Nov-19 | a | \$ | - | - | 0 | \$ | 3,836.60 | \$ | $(3,836.60)$ |  | \$0 |
| Dec-19 | a | \$ | - | - | 0 | \$ | 6,837.94 | \$ | $(6,837.94)$ |  | \$0 |
| Jan-20 | a | \$ | - | - | 0 | \$ | 5,513.45 | \$ | $(5,513.45)$ |  | \$0 |
| Feb-20 | a | \$ | - | - | 0 | \$ | 5,441.07 | \$ | $(5,441.07)$ |  | \$0 |
| Mar-20 | a | \$ | - | - | 0 | \$ | 11,807.97 | \$ | $(11,807.97)$ |  | \$ |
| Total |  | \$ | - |  | \$ | \$ | 76,657.02 | \$ | $(76,657.02)$ |  | \$0 |

Margin Deficiency/ (Credit)
Prior Period (Over) / Under Recovery

Total Deficiency/(Credit)

\$

| 0 |
| ---: |
| 1.002569 |

\$
$\qquad$ -

## \$

\$
$\$$

Projected TGS KW Use

Pre-tax CIP Charge/(Credit) per KW

CIP Charge/(Credit) including assessments 6.625\% Sales Tax

Proposed After-tax CIP Charge/(Credit) per KW
Current After-tax CIP Charge/(Credit) per KW

Increase/ (Decrease) in After-tax CIP Charge/(Credit) per KW

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illustrative purposes only
Atlantic City Electric Company

| Atlantic City Electric Company <br> Customers, Demand, Sales |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Transmission General Service (TGS) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | $\begin{aligned} & \text { Actual } \\ & \text { Jan-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Feb-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Mar-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Apr-18 } \end{aligned}$ | $\begin{gathered} \text { Actual } \\ \text { May-18-1 } \end{gathered}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jun-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jul-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \underline{\text { Aug-18 }} \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Sep-18 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Oct-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Nov-18 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Dec-18 } \end{aligned}$ |  |
| Volumes |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Summer/Winter kwh |  | 30,324,453 | 33,685,204 | 29,184,621 | 32,488,791 | 38,448,330 | 55,911,964 | 40,102,019 | 41,955,387 | 43,291,681 | 42,358,740 | 39,123,802 | 39,327,980 |  |
|  | Total Volume | 30,324,453 | 33,685,204 | 29,184,621 | 32,488,791 | 38,448,330 | 55,911,964 | 40,102,019 | 41,955,387 | 43,291,681 | 42,358,740 | 39,123,802 | 39,327,980 | 466,202,972 |
| Demand |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| <5000 KW |  | 20,865 | 17,743 | 22,879 | 24,766 | 13,614 | 20,842 | 20,595 | 31,127 | 1,139 | 19,142 | 8,210 | 22,452 |  |
| 5000-9000 KW |  | 13,153 | 16,259 | 25,369 | 19,329 | 20,674 | 16,069 | 18,795 | 27,271 | 16,111 | 15,749 | 16,084 | 16,278 |  |
| >9000 KW |  | 20,431 | 26,815 | 7,497 | 25,937 | 28,518 | 46,103 | 33,269 | 33,195 | 18,159 | 17,159 | 34,323 | 45,762 |  |
|  | Total Demand | 54,449 | 60,817 | 55,746 | 70,031 | 62,806 | 83,014 | 72,659 | 91,593 | 35,409 | 52,050 | 58,617 | 84,491 | $\stackrel{781,681}{ }$ |
| Rates (pre-tax) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Summer/Winter kwh |  | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 | 0.000000 |  |
| <5000 KW |  | 2.757327 | 2.757327 | 2.757327 | 2.757327 | 2.757327 | 2.757327 | 2.757327 | 2.757327 | 2.757327 | 2.757327 | 2.757327 | 2.757327 |  |
| 5000-9000 KW |  | 2.128957 | 2.128957 | 2.128957 | 2.128957 | 2.128957 | 2.128957 | 2.128957 | 2.128957 | 2.128957 | 2.128957 | 2.128957 | 2.128957 |  |
| >9000 KW |  | 0.131301 | 0.131301 | 0.131301 | 0.131301 | 0.131301 | 0.131301 | 0.131301 | 0.131301 | 0.131301 | 0.131301 | 0.131301 | 0.131301 |  |
| Revenues |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Volume Charge Revenues Demand Charge Revenues |  | - | - | - | - | - | - | - | - | - | - | - | - | - |
|  | Total Revenue | 88,215 | 87,057 | 118,080 | 112,843 | 85,295 | 97,733 | 101,169 | 148,245 | 39,824 | 88,563 | 61,386 | 102,569 | 1,130,979 |
|  |  | 88,215 | 87,057 | 118,080 | 112,843 | 85,295 | 97,733 | 101,169 | 148,245 | 39,824 | 88,563 | 61,386 | 102,569 | 1,130,979 |
| Customers |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| <5000 KW |  | 7 | 7 | 5 | 6 | 8 | 7 | 6 | 6 | 6 | 6 | 6 | 5 | 75 |
| 5000-9000 KW |  | 5 | 5 | 4 | 4 | 5 | 5 | 5 |  | 5 | 5 | 5 | 4 | 57 |
| >9000 KW |  | 4 | 4 | 1 | 4 | 4 | 4 | 4 | 5 | 5 | 5 | 5 | 6 | 51 |
|  | Total Customers | 16 | 16 | 10 | 14 | 17 | 16 | 15 | 16 | 16 | 16 | 16 | 15 | 183 |
|  | Baseline | 5,513.45 | 5,441.07 | 11,807.97 | 8,060.20 | 5,017.35 | 6,108.30 | 6,744.60 | 9,265.32 | 2,489.03 | 5,535.19 | 3,836.60 | 6,837.94 | 6,180.21 |

ILLUSTRATVE PURPOSES ONLY

|  | Atlantic City Electric Company Statement of Estimated Under/(Over) Recovered CIP Balance Transmission General Service (TGS) Twelve Months Ending March 2020 |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{aligned} & \text { Actual } \\ & \text { Apr-19 } \end{aligned}$ | $\begin{gathered} \text { Actual } \\ \text { May-19 } \end{gathered}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jun-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jul-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Aug-19 } \end{aligned}$ | $\begin{aligned} & \text { A } \\ & \text { Sep-19al } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Oct-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Nov-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Dec-19 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Jan-20 } \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Feb-20 } \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Actual } \\ & \text { Mar-20 } \end{aligned}$ | TOTAL |
| Beginning Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| KW Demand | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Pre-tax Recovery Rate per $\mathrm{KW}^{1}$ | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |  |
| Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Ending Under/(Over) Recovery \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

${ }^{1}$ Pre-tax Recovery Rate per demand excluding BPU and RC assessments.

## Schedule (MTN)-4

## RIDER "EE" <br> ENERGY EFFICIENCY PROGRAM ("EE") RECOVERY CHARGE

## APPLICABILITY:

This rider is applicable to Rate Schedules RS, MGS Secondary, MGS Primary, AGS Secondary, AGS Primary, TGS, DDC, SPL and CSL. Amounts billed to customers shall include a charge to reflect the costs for the approved EE programs. Rider "EE" will be determined annually based on projections of EE program costs (including an adjustment for variances between budgeted and actual prior year expenditures) and forecasts of kilowatt hour sales.

The Company's EE Recovery Charge, including sales and use tax, to be effective on and after the date indicated below is as follows:
EE Recovery Charge $\quad \$ \quad 0 . x x x x x x \quad \$$ per kWh

## DETERMINATION OF SURCHARGE:

The surcharge (in dollars per kilowatt hour) will be computed by dividing the total annual amount to be recovered by forecasted retail sales (in kilowatt hours).

The total amount to be recovered $(\mathrm{R})$ is computed in accordance with the following formula:

$$
R=A+B+C+D
$$

Where $A$ is annual operation and maintenance expense (paragraph (a), below), $B$ is annual depreciation and amortization (paragraph (b), below), C is the capital cost recovery factor (CCRF) (paragraph (c), below), and D is any prior year under or over recoveries, including interest at the Company's short-term debt rate (paragraph (d), below). The surcharge will be computed for billing purposes in accordance with the procedure described below:
(a) Current year program costs will be determined by reference to budgeted and projected utility costs. Program costs are a combination of investment costs, capital costs and operation and maintenance costs, including but not limited to, implementation contractor expenses, education costs, marketing costs, rebates, utility administration costs, utility incentives, and evaluation, measurement and verification ("EM\&V") costs applicable to the EE Portfolio Plan programs.
(b) The unamortized balance of program costs for each prior year will be determined as of the beginning of the year by subtracting accumulated depreciation and amortization from cumulative program costs at that date. Such costs, depreciation and amortization are recorded in an EE Program Recovery Account.

Amortization for the year will be based on a ten-year amortization period and will be the sum of:
(i) A pro-rated amount of the estimated current year program costs; and
(ii) An annual amount of amortization of the unamortized balance of program costs for each prior year (as of the beginning of the period).

Depreciation for the year will be based on a five-year life and will be the sum of:
(i) A pro-rated amount of the estimated current year capital costs; and
(ii) An annual amount of depreciation of the unamortized balance of capital costs for each prior year (as of the beginning of the period).

Through this mechanism, the subsequent years of depreciation and amortization related to a given year's program costs will reflect a true-up for any variance between actual and originally projected costs or sales in that year.

Page 2 of 2
(c) The Capital Cost Recovery Factor (CCRF) will be computed for billing purposes by monthly application of the last Board-authorized rate of return on rate base in a base rate proceeding to the average monthly unamortized balance of program costs. The CCRF will be recalculated with each annual update of the tariff with no compounding.
(d) Any under or over recoveries due to variances between budgeted and actual prior year expenditures will be included as a true-up adjustment in the current year. The Company's short-term debt rate, or if no shortterm debt is outstanding, the rate on equivalent temporary cash investments, will be applied to the net of tax beginning and ending average monthly under or over recovery balance to accrue simple interest with an annual roll-in at the end of each reconciliation period. The short-term debt rate will be recalculated on a monthly basis.

## NEW JERSEY SALES AND USE TAX (SUT)

Charges under this Rider include a component for New Jersey Sales and Use Tax as set forth in Rider SUT.

## Issued by:

## Schedule (MTN)-5

# RIDER "CIP" <br> CONSERVATION INCENTIVE PROGRAM ("CIP") RECOVERY CHARGE 

## APPLICABILITY:

This rider is applicable to Rate Schedules RS, MGS Secondary, MGS Primary, AGS Secondary, AGS Primary, and TGS. This rider shall be utilized to adjust the Company's revenues in cases wherein actual revenue per customer experienced during an annual period varies from the baseline revenue per customer. This adjustment will be effectuated through a credit or surcharge applied to customers' bills during the adjustment period. The credit or surcharge will also be adjusted to reflect prior year under or over recoveries pursuant to Rider "CIP". The Company at its discretion will make annual filings.

The Company's CIP Recovery Charge including sales and use tax to be effective on and after the date indicated below is as follows:

Rate Schedule<br>Residential<br>MGS Secondary<br>MGS Primary<br>AGS Secondary<br>AGS Primary<br>TGS Sub Transmission<br>TGS Transmission

| Rate |  |
| :--- | :--- |
| \$x.xxxxxx | per kWh |
| \$x.xx | per kW |
| \$x.xx | per kW |
| \$x.xx | per kW |
| \$x.xx | per kW |
| \$x.xx | per kW |
| \$x.xx | per kW |

## DETERMINATION OF SURCHARGE:

The surcharge (in dollars per kilowatt-hour or kilowatt) will be computed by dividing the total annual amount to be recovered by forecasted retail sales or demand (in kilowatt hours or kilowatts).

The total amount to be recovered (R) for each applicable rate schedule is computed in accordance with the following formula:

$$
R=((A-B) * C)-D+E
$$

Where $A$ is Baseline revenue per customer (paragraph ( $a$ ), below), $B$ is the actual revenue per customer (paragraph (b), below), $C$ is the actual number of customers (paragraph (c), below), $D$ is the Company's weather effect (paragraph (d), below), and E is any prior year under or over recoveries. Where A, B, C, D, and E are calculated monthly by rate schedule and the amount to be recovered ( $R$ ) by rate schedule reflects an annual amount based on the monthly calculations.
(a) Baseline Revenue Per Customer - Established for the applicable rate schedules from the Company's most recent base rate case proceeding. Calculated monthly using the Board approved base distribution kilowatt-hour and kilowatt charges excluding sales and use tax multiplied by the monthly billing determinants divided by that month's number of customers. The resulting calculation determines the approved monthly Baseline Revenue per Customer. The table below summaries the Board approved monthly Baseline Revenue per customer:

|  |  | RS | MGSS | MGSP | AGSS | AGSP | TGSS |  | TGS |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Jan | \$ | 43.54 | \$ 122.16 | \$ 973.18 | \$ 1,471.74 | \$ 7,203.29 | \$ 7,247.68 | \$ | 5,513.45 |
| Feb | \$ | 37.51 | \$ 108.34 | \$ 1,970.30 | \$ 1,308.11 | \$ 7,756.64 | \$ 7,362.49 | \$ | 5,441.07 |
| Mar | \$ | 33.42 | \$ 102.71 | \$ 1,790.77 | \$ 1,470.24 | \$ 7,334.61 | \$ 7,494.13 |  | 11,807.97 |
| Apr | \$ | 29.86 | \$ 107.30 | \$ 1,304.15 | \$ 1,316.74 | \$ 6,694.28 | \$ 7,579.94 | \$ | 8,060.20 |
| May | \$ | 24.48 | \$ 97.24 | \$ 985.59 | \$ 1,322.62 | \$ 7,327.29 | \$ 6,715.50 | \$ | 5,017.35 |
| Jun | \$ | 37.44 | \$ 128.49 | \$ 1,263.62 | \$ 1,470.24 | \$ 7,521.45 | \$ 7,390.62 | \$ | 6,108.30 |
| Jul | \$ | 60.52 | \$ 167.19 | \$ 1,507.13 | \$ 1,424.81 | \$ 7,684.82 | \$ 7,166.76 | \$ | 6,744.60 |
| Aug | \$ | 66.93 | \$ 173.20 | \$ 1,753.07 | \$ 1,477.15 | \$ 8,310.29 | \$ 7,988.01 | \$ | 9,265.32 |
| Sept | \$ | 60.25 | \$ 172.12 | \$ 1,368.24 | \$ 1,524.55 | \$ 8,173.31 | \$ 7,743.85 | \$ | 2,489.03 |
| Oct | \$ | 33.55 | \$ 122.10 | \$ 1,137.24 | \$ 1,349.45 | \$ 7,431.95 | \$ 7,148.96 | \$ | 5,535.19 |
| Nov | \$ | 27.80 | \$ 96.53 | \$ 1,348.09 | \$ 1,286.00 | \$ 7,795.57 | \$ 6,586.12 | \$ | 3,836.60 |
| Dec | \$ | 33.54 | \$ 97.13 | \$ 842.17 | \$ 1,264.24 | \$ 6,264.09 | \$ 5,895.56 | \$ | 6,837.9 |

(b) Actual Revenue per Customer - Determined using the actual base distribution revenue booked for kilowatt-hour and kilowatt revenues divided by the actual number of customers (c) for an annual period calculated on a monthly basis by rate schedule.
(c) Actual Number of Customers - Customer count for the annual period determined on a monthly basis by rate schedule based on the Company's books and records.
(d) Weather Effect - The variance of actual kilowatt-hour sales from weather normalized sales for an annual period is removed in determining the amount to be recovered ( $R$ ) above. This is calculated in a consistent manner from the Company's most recent base rate case proceeding.
(e) Forecasted Retail Sales or Demand - An annual billing determinant forecast of kilowatt-hour sales or kilowatt demand.

## NEW JERSEY SALES AND USE TAX (SUT)

Charges under this Rider include a component for New Jersey Sales and Use Tax as set forth in Rider SUT.

## CORPORATE BUSINESS TAX (CBT)

Charges under this rate schedule include a component for Corporate Business Taxes as set forth in Rider CBT.

IN THE MATTER OF THE PETITION OF ATLANTIC CITY ELECTRIC COMPANY FOR APPROVAL OF AN ENERGY EFFICIENCY PROGRAM, COST RECOVERY MECHANISM AND OTHER RELATED RELIEF FOR PLAN YEARS ONE THROUGH THREE

IN THE MATTER OF THE IMPLEMENTATION OF P.L. 2018, c. 17 REGARDING THE ESTABLISHMENT OF ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION PROGRAMS

## STATE OF NEW JERSEY <br> BOARD OF PUBLIC UTILITIES

BPU DOCKET NO. $\qquad$

BPU DOCKET NO. QO19010040

## CERTIFICATION OF SERVICE

PHILIP J. PASSANANTE, of full age, certifies as follows:

1. I am an attorney at law of the State of New Jersey and serve as Assistant General Counsel to Atlantic City Electric Company, the Petitioner in the within matter, with which I am familiar.
2. I hereby certify that, on the date below, I caused the within Petition and the supporting attachments and exhibits thereto, to be filed with the New Jersey Board of Public Utilities through its eFiling Portal. I also caused an electronic copy to be sent to the Board Secretary's office at board.secretary@bpu.state.nj.us.
3. I further certify that, on the date below, I caused a complete copy of the Petition and the supporting attachments and exhibits thereto, to be sent by electronic mail to each of the parties listed in the attached Service List, including the Division of Law and the New Jersey Division of Rate Counsel.
4. Consistent with the Order issued by the Board in connection with In the Matter of the New Jersey Board of Public Utilities' Response to the COVID-19 Pandemic for a Temporary Waiver of Requirements for Certain Non-Essential Obligations, BPU Docket No. EO20030254, Order dated March 19, 2020, only electronic copies of this filing will be served on persons on the Service List.
5. I further and finally certify that the foregoing statements made by me are true. I am aware that, if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: September 25, 2020
Auaunet
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In the Matter of the Petition of Atlantic City Electric Company for Approval of an Energy Efficiency Program, Cost Recovery Mechanism and Other Related Relief for Plan Years One Through Three

BPU Docket No.

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[^0]:    ${ }^{1}$ See I/M/O the Implementation of P.L. 2018, c. 17 Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs, BPU Docket Nos. QO19010040, QO19060748, QO17091004, Order Directing the Utilities to Establish Energy Efficiency and Peak Demand Reduction Programs (dated June 10, 2020) [hereinafter, the "EE Order"], at 38.

[^1]:    ${ }^{1}$ In light of exigencies created by the COVID-19 pandemic and the Executive Orders issued pursuant thereto, this Petition is being submitted under Certification in lieu of an Affidavit of Verification.

[^2]:    ${ }^{2}$ See I/M/O the Merger of Exelon Corporation and Pepco Holdings, Inc., BPU Docket No. EM14060581, Order Approving Stipulation of Settlement (dated March 6, 2015). The merger of Exelon and PHI closed on March 23, 2016.
    ${ }^{3}$ See, e.g., N.J.S.A. 48:2-13; N.J.S.A. 48:2-21.
    ${ }^{4}$ See I/M/O the Implementation of P.L. 2018, c. 17 Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs, BPU Docket Nos. QO19010040, QO19060748, QO17091004, Order Directing the Utilities to Establish Energy Efficiency and Peak Demand Reduction Programs (dated June 10, 2020) [hereinafter, the "EE Order"].
    ${ }^{5}$ P.L. 2018, c. 17, (codified at N.J.S.A. 48:3-87.8 et al.).
    ${ }^{6}$ The RGGI Act was promulgated as P.L. 2007, c. 340, and codified at N.J.S.A. 48:3-98.1 et seq.

[^3]:    ${ }^{7}$ See I/M/O the Merger of Exelon Corporation and Pepco Holdings, Inc., BPU Docket No. EM14060581, Order Approving Joint Recommendation for Settlement of the Most Favored Nation Issue (dated October 31, 2016) [hereinafter, the "Reconciliation Order"]. The Reconciliation Order approved a settlement in which Exelon agreed to "spend $\$ 15$ million over five years (through March, 2021) to provide energy-efficiency programs in the ACE service territory. ACE will direct the energy-efficiency programs and will include programs targeting low-income customers and economically-challenged towns and cities." Reconciliation Order, at 4-5. As this expenditure has been previously approved by the Board, additional approvals for these expenditures are not required and are not being requested by the Company.

[^4]:    ${ }^{8}$ The Board recently approved a CIP calculation methodology for another New Jersey electric public utility. See I/M/O the Petition of Public Service Electric and Gas Company for Approval of Its Clean Energy Future-Energy

[^5]:    ${ }^{9}$ See EE Order, at 3.

[^6]:    ${ }^{10}$ See EE Order, at 2.
    ${ }^{11}$ See EE Order, at 4.
    ${ }^{12}$ See I/M/O Electric Public Utilities and Gas Public Utilities Offering Energy Efficiency and Conservation Programs, Investing in Class I Renewable Energy Resources, And Offering Class I Renewable Energy Programs In Their Respective Service Territories on a Regulated Basis Pursuant to N.J.S.A. 48:3-98.1, BPU Docket No. EO08030164, Order (dated May 8, 2008) [hereinafter, the "May 2008 RGGI Order"].
    ${ }^{13}$ See id. See also, N.J.S.A. 48:3-98.1(b).

[^7]:    ${ }^{14}$ See EE Order, at 2 citing P.L. 2018, c. 17, (codified at N.J.S.A. 48:3-87.8 et al.).
    ${ }^{15}$ See EE Order, at 2.
    ${ }^{16}$ See EE Order, passim.
    ${ }^{17}$ See EE Order, at 37.
    ${ }^{18}$ See EE Order, at 38.
    ${ }^{19}$ See EE Order, at 38-39.

[^8]:    ${ }^{20}$ See EE Order, at 16, 37.
    ${ }^{21}$ See EE Order, at 38.
    ${ }^{22}$ N.J.S.A. 48:3-87.9(a) directs the Board to require each electric utility to achieve annual energy use reduction targets of at least $2 \%$ of the average annual electricity usage in the prior three years within five years of implementing its EE program.
    ${ }^{23}$ See EE Order, at 20-22, 39. The Board did not set targets for PY1.
    ${ }^{24}$ See id.

[^9]:    ${ }^{25}$ See I/M/O the Implementation of P.L. 2018, c. 17 Regarding the Establishment of Energy Efficiency and Peak Demand Reduction Programs, and I/M/O the Clean Energy Act of 2018 - New Jersey Cost Test, BPU Docket Nos. QO19010040, and QO20060389, Order Adopting the First New Jersey Cost Test (dated August 24, 2020), at 8 [hereinafter, the "NJ Cost Test Order"].

[^10]:    ${ }^{26}$ See NJ Cost Test Order, at 8.

[^11]:    ${ }^{27}$ See EE Order, at 16.

[^12]:    ${ }^{28}$ See EE Order, at 26.

[^13]:    ${ }^{29}$ See Decision and Order Adopting Initial Decision and Stipulation of Settlement, In the Matter of the Petition of Atlantic City Electric Company for Approval of Amendments to Its Tariff and Provide for an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, and for Other Appropriate Relief (2018), BPU Docket No. ER18080925; OAL Docket No. 14569-2018S (March 13, 2019).

[^14]:    ${ }^{30}$ See I/M/O the Implementation of P.L. 2018, c. 17 Regarding the Establishment of Energy Efficiency and Reak Demand Reduction Programs, BPU Docket No. QO19010040, Order Designating Commissioner, Setting Manner of Service and Bar Dates (dated September 23, 2020), at 3 (also setting dates for motions to intervene).

[^15]:    ${ }^{1}$ Ms. Slaten is recused from sponsoring portions of this testimony and filing related to Opower/Oracle - Home Energy Reports and Quick Home Energy Check-up due to her prior involvement in her former role at the BPU. Support for those programs and related testimony are specifically sponsored by Mr. Ellis.

[^16]:    ${ }^{2} 2019$ New Jersey Energy Master Plan: Pathway to 2050. nj.gov/emp/docs/pdf/2020_NJBPU_EMP.pdf

[^17]:    ${ }^{3}$ Global Warming Response Act. 2006. njleg.state.nj.us/2006/Bills/PL07/112_.HTM
    ${ }^{4}$ Act Concerning the Reduction of Greenhouse Gas Emissions. 2007. njleg.state.nj.us/2006/Bills/PL07/340_.PDF
    ${ }^{5}$ Page 3 of ACE’s EE Program Plan provided as Schedule (BJB)-2.

[^18]:    ${ }^{6}$ Opower was the name of the vendor supporting the Behavior Program in 2017, when the program started. The company is now named Oracle and continues to issue the Home Energy Reports that support the Behavior Program.

[^19]:    ${ }^{7}$ See In The Matter of The Petition of Public Service Electric and Gas Company for Approval of Its Clean Energy Future-Energy Efficiency ("CEF-EE") Program on a Regulated Basis, pages 16-21, BPU Docket No. GO18101112 and EO18101113 (September 23, 2020).

[^20]:    ${ }^{1}$ Both cases were compliance filings for the Elizabethtown Gas energy efficiency programs.
    ${ }^{2}$ njleg.state.nj.us/2018/Bills/PL18/17 .PDF
    ${ }^{3}$ BPU Order Directing the Utilities to Establish Energy Efficiency and Peak Demand Reduction Programs, BPU Docket Nos. QO19010040, QO19060748, and QO10791004 (June 10, 2020).

[^21]:    ${ }^{4}$ See June 10 Order at page 18.

[^22]:    ${ }^{5}$ See June 10 Order at page 19.

[^23]:    ${ }^{6}$ BPU Order Adopting the First New Jersey Cost Test. BPU Docket Nos. QO19010040 and QO20060389 (August 24, 2020).
    ${ }^{7}$ California Public Utilities Commission. 2001. California Standard Practice Manual: Economic Analysis of DemandSide Programs and Projects.
    cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and Industries/Energy_-
    _Electricity_and_Natural_Gas/CPUC_STANDARD_PRACTICE_MANUAL.pdf
    ${ }^{8}$ Gabel Associates filed extensive comments on these benefits during the stakeholder process for the NJCT. These comments can be found at the following web address, beginning on page 156.
    njcepfiles.s3.amazonaws.com/2020.8.5+NJCT+Comments.pdf

[^24]:    ${ }^{9}$ The results of the emissions avoided analysis are presented in Schedule (BJB)-6.

[^25]:    ${ }^{10}$ The results of the economic development benefits analysis are shown in Schedule (BJB)-7.
    ${ }^{11}$ Molina, M. and G. Relf. 2018. Does Energy Efficiency Still Delivery the Biggest Bang for Our Buck? A Review of Cost of Saved Energy for U.S. Electric Utilities. American Council for an Energy-Efficient Economy. Presented at the 2018 ACEEE Summer Study in Buildings.

[^26]:    ${ }^{12}$ BPU Order Adopting the First New Jersey Cost Test. BPU Docket Nos. QO19010040 and QO20060389 (August 24, 2020).
    ${ }^{13}$ California Public Utilities Commission. 2001. California Standard Practice Manual: Economic Analysis of Demand-Side Programs and Projects.
    cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities and Industries/Energy -
    Electricity_and_Natural_Gas/CPUC_STANDARD_PRACTICE_MANUAL.pdf

[^27]:    ${ }^{14}$ BPU Order Adopting the First New Jersey Cost Test, BPU Docket Nos. QO19010040 and QO20060389 (August 24, 2020), p. 12
    ${ }^{15}$ United States Energy Information Administration. Annual Energy Outlook 2020. Table 54. Electric Power Projections by Electricity Market Module Region (Reference Case, PJM/East Region).
    eia.gov/outlooks/aeo/data/browser/\#/?id=62-AEO2020\&region=5-
    10\&cases=ref2020\&start=2018\&end=2050\&f=A\&linechart=ref2020-d112119a.130-62-AEO2020.510\&map=\&ctype=linechart\&sourcekey=0.
    ${ }^{16}$ Monitoring Analytics, LLC. 2019 State of the Market Report for PJM. Section 10 Ancillary Services. Table 10-4. History of ancillary service costs per MWh of load: 1999 through 2019.
    monitoringanalytics.com/reports/PJM_State_of_the_Market/2019/2019-som-pjm-sec10.pdf

[^28]:    ${ }^{17}$ New Jersey Board of Public Utilities. New Jersey Cost Test. August 24, 2020. Page 15-16. bpu.state.nj.us/bpu/pdf/boardorders/2020/20200824/8A\%20-\%20ORDER\%20New\%20Jersey\%20Cost\%20Test.pdf

[^29]:    ${ }^{18}$ Ibid. page 13.

[^30]:    ${ }^{19}$ For studies reviewed, please see Baatz et al. Estimating the Value of Energy Efficiency to Reduce Wholesale Energy Price Volatility. American Council for an Energy-Efficient Economy; aceee.org/research-report/u1803. Stanton et al. Net Metering in Mississippi. Synapse Energy Economics. Appendix A. synapseenergy.com/sites/default/files/Net\%20Metering\%20in\%20Mississippi.pdf; Hornby et al. Avoided Energy Supply Costs in New England: 2013 Report. Synapse Energy Economics. pp 5-22. publicservice.vermont.gov/sites/dps/files/documents/Energy_Efficiency/AESC\%20Report\%20-
    \%20With\%20Appendices\%20Attached.pdf; 2013 Integrated Resource Plan. Rocky Mountain Power. pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/2013IRP/PacifiCorp-2013IRP_Vol1-Main_4-30-13.pdf
    and pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/2013IRP/PacifiCorp2013IRP Vol2-Appendices 4-30-13.pdf; Bolinger et al. Quantifying the Value that Energy Efficiency and Renewable Energy Provide As a Hedge Against Volatile Natural Gas Prices. Lawrence Berkley National Labs. aceee.org/files/proceedings/2002/data/papers/SS02_Panel5_Paper02.pdf; Is Fixed Price Energy a Good Deal? Walden Labs. waldenlabs.com/is-fixed-price-energy-a-good-deal; EEU Avoided Costs for the 2016-2017 Time Period. P. 17 - number 6. puc.vermont.gov/sites/psbnew/files/doc library/order-re-eeu-avoided-cost-2016-2017.pdf.
    ${ }^{20}$ PJM Annual Transmission Revenue Requirements and Rates. pjm.com/-/media/markets-ops/settlements/network-integration-trans-service-june-2020.ashx?la=en

[^31]:    ${ }^{21}$ New Jersey Board of Public Utilities. New Jersey Cost Test. August 24, 2020. Page 13. bpu.state.nj.us/bpu/pdf/boardorders/2020/20200824/8A\%20-\%20ORDER\%20New\%20Jersey\%20Cost\%20Test.pdf

[^32]:    ${ }^{22}$ New Jersey Board of Public Utilities. New Jersey Cost Test. August 24, 2020. Page 17. bpu.state.nj.us/bpu/pdf/boardorders/2020/20200824/8A\%20-\%20ORDER\%20New\%20Jersey\%20Cost\%20Test.pdf
    ${ }^{23}$ Interagency Working Group on Social Cost of Greenhouse Gases, United States Government. 2016 Technical Support Document: -Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis -Under Executive Order 12866. August 2016. epa.gov/sites/production/files/2016-12/documents/sc_co2_tsd_august_2016.pdf
    ${ }^{24}$ United States Environmental Protection Agency. Emissions and Generation Resource Integrated Database (eGRID). Released 1/28/2020, Revised 3/9/2020. epa.gov/energy/emissions-generation-resource-integrated-database-egrid
    ${ }^{25}$ United States Energy Information Administration. Annual Energy Outlook 2020. Table 54. Electric Power Projections by Electricity Market Module Region (Reference Case, PJM/East Region). eia.gov/outlooks/aeo/data/browser/\#/?id=62-AEO2020\&region=5-10\&cases=ref2020\&start=2018\&end=2050\&f=A\&linechart=ref2020-d112119a.108-62-AEO2020.5-10~ref2020-d112119a.156-62-AEO2020.5-10~ref2020-d112119a.157-62-AEO2020.5-10~ref2020-d112119a.158-62-AEO2020.5-10~\&map=\&ctype=linechart\&sourcekey=0.

[^33]:    ${ }^{26}$ United States Environmental Protection Agency. 2018. Technical Support Document: Estimating the Benefit per Ton of Reducing PM2.5 Precursors from 17 Sectors. epa.gov/sites/production/files/201802/documents/sourceapportionmentbpttsd_2018.pdf.
    ${ }^{27}$ In the Matter of the Board of Public Utilities Offshore Wind Solicitation for 1,100 MW - Evaluation of the Offshore Wind Applications, BPU Docket No. QO18121289. bpu.state.nj.us/bpu/pdf/boardorders/2019/20190621/6-21-198D.pdf
    ${ }^{28}$ Levitan \& Associates, Inc. Evaluation of New Jersey Solicitation for ORECs for Offshore Wind Capacity Framework for Evaluation of Impacts. bpu.state.nj.us/bpu/pdf/boardorders/2019/20190621/6-21-19-8D\%20-\%20Public\%20Version\%20-\%20Levitan\%20NJ\%20OREC\%20Final\%20Report.pdf

[^34]:    ${ }^{29}$ BPU Order in the Matter of the Opening of Offshore Wind Renewable Energy Certificate (OREC) Application Window for 1,100 Megawatts of Offshore Wind Capacity in Furtherance of Executive Order 8, BPU Docket No. QO18080851 (September 17, 2018). nj.gov/bpu/pdf/boardorders/2018/20180917/9-17-18-8G.pdf
    ${ }^{30}$ New Jersey Board of Public Utilities. New Jersey Cost Test. August 24, 2020. Page 18. bpu.state.nj.us/bpu/pdf/boardorders/2020/20200824/8A\%20-\%20ORDER\%20New\%20Jersey\%20Cost\%20Test.pdf

[^35]:    ${ }^{31}$ New Jersey Board of Public Utilities. New Jersey’s Clean Energy Program Protocols to Measure Resource Savings FY2020. Approved July 10, 2019. njcleanenergy.com/files/file/NJCEP\%20Protocols\%20to\%20Measure\%20Resource\%20Savings\%20FY20_FINAL.p df

[^36]:    ${ }^{32}$ Mid-Atlantic Technical Reference Manual. Version 9. October 2019. neep.org/sites/default/files/resources/Mid_Atlantic_TRM_V9_Final_clean_wUpdateSummary\%20\%20CT\%20FORMAT.pdf

    33 Massachusetts Technical Reference Manual. 2016-2018 Plan Version. ma-eeac.org/wordpress/wp-content/uploads/Exhibit-1-Gas-and-Electric-PAs-Plan-2016-2018-with-App-except-App-U.pdf
    ${ }^{34}$ New York State Department of Public Service. Technical Reference Manual. dps.ny.gov/W/PSCWeb.nsf/All/72C23DECFF52920A85257F1100671BDD
    ${ }^{35}$ New Jersey Board of Public Utilities. New Jersey Cost Test. August 24, 2020. Page 13. bpu.state.nj.us/bpu/pdf/boardorders/2020/20200824/8A\%20-\%20ORDER\%20New\%20Jersey\%20Cost\%20Test.pdf
    ${ }^{36}$ BPU Order Directing the Utilities to Establish Energy Efficiency and Peak Demand Reduction Programs, BPU Docket Nos. QO19010040, QO19060748, and QO10791004 (June 10, 2020).

[^37]:    ${ }^{1} 2019$ New Jersey Energy Master Plan: Pathway to 2050. nj.gov/emp/docs/pdf/2020_NJBPU_EMP.pdf
    ${ }^{2}$ Global Warming Response Act. 2006. njleg.state.nj.us/2006/Bills/PL07/112 .HTM
    ${ }^{3}$ Act Concerning the Reduction of Greenhouse Gas Emissions. 2007. njleg.state.nj.us/2006/Bills/PL07/340 _.PDF
    ${ }^{4}$ Clean Energy Act. 2018. njleg.state.nj.us/2018/Bills/PL18/17 .HTM
    ${ }^{5}$ Order Directing the Utilities to Establish Energy Efficiency and Peak Demand Reduction Programs. bpu.state.nj.us/bpu/pdf/boardorders/2020/20200610/8D--
    Order\%20Directing\%20the\%20Utilities\%20to\%20Establish\%20Energy\%20Efficiency\%20and\%20Peak\%20Deman d\%20Reduction\%20Programs.pdf
    ${ }^{6}$ The total retail electric-only savings for ACE customers is $\$ 533$ million.

[^38]:    ${ }^{7}$ BPU Docket No. EM14060581.

[^39]:    ${ }^{8}$ Due to the nature of the Products Programs, this will be reflected as the total number of units.

[^40]:    ${ }^{9}$ The purpose of this study was to examine the demographics and firmographics of all customers in the service territories of each of the electric and gas public utilities in New Jersey. This is to comply with P.L. 2018, c. 17, codified at N.J.S.A. 48:3-51-87 et seq., commonly known as the Clean Energy Act of 2018 ("Clean Energy Act" or "CEA"), as well as in response to the New Jersey Board of Public Utilities (NJBPU) Order Docket Nos. QO19010040 and QO19060748 (dated October 7, 2019), which directed the utilities to complete a demographic analysis pursuant to the Clean Energy Act. The study was released on April 30, 2020 and can be found here.

[^41]:    ${ }^{10}$ Sussman, R. and M. Chikumbo. 2016. Behavior Change Programs: Status and Report. American Council for an Energyefficient Economy. aceee.org/sites/default/files/publications/researchreports/b1601.pdf

[^42]:    ${ }^{11}$ Properties larger than 4 units will be referred for consideration in the Multi-family Program.

[^43]:    ${ }^{12}$ https://homeenergysavings.delmarva.com/sites/default/files/public/18830_DPL_2019_CI_Tune-up_Fact\%20Sheet_v3_RELEASE-Web.pdf
    ${ }^{13}$ http://ma-eeac.org/wordpress/wp-content/uploads/Energy-Productivity-Memo-5-11-17.pdf

[^44]:    ${ }^{14}$ Massachusetts Energy Efficiency Advisory Council. 2015. Health Care Best Practices Study. ma-eeac.org/wordpress/wp-content/uploads/MA-EEAC-Consultant-Team-Healthcare-Best-Practices-Study.pdf

[^45]:    ${ }^{15}$ Slide 11 - http://ma-eeac.org/wordpress/wp-content/uploads/EEAC-July24-CI-2019-Launch-Presentation_Final_7-17-19.pdf
    ${ }^{16}$ Massachusetts Energy Efficiency Advisory Council. 2017. Memo: Increasing Energy Productivity through Strategic Energy Management. ma-eeac.org/wordpress/wp-content/uploads/Energy-Productivity-Memo-5-11-17.pdf
    ${ }^{17}$ Consortium for Energy Efficiency. CEE Strategic Energy Management Minimum Elements. library.cee1.org/system/files/library/11283/SEM_Minimum_Elements.pdf

[^46]:    ${ }^{18}$ Massachusetts Energy Efficiency Advisory Council. 2019. C\&I Update. ma-eeac.org/wordpress/wp-content/uploads/EEAC-July24-CI-2019-Launch-Presentation_Final_7-17-19.pdf
    ${ }^{19}$ Massachusetts Energy Efficiency Advisory Council. 2014. Retrocommissioning Best Practice Study. ma-eeac.org/wordpress/wp-content/uploads/EEAC_CT_RetroCommissioningBestPracticesStudy.pdf
    ${ }^{20}$ Massachusetts Energy Efficiency Advisory Council. 2017. Memo: Increasing Energy Productivity through Strategic Energy Management. http://ma-eeac.org/wordpress/wp-content/uploads/Energy-Productivity-Memo-5-11-17.pdf

[^47]:    ${ }^{21}$ https://www.aceee.org/toolkit/2020/02/evaluation-measurement-verification

[^48]:    ${ }^{22}$ New Jersey Board of Public Utilities. Order Adopting the First New Jersey Cost Test. Docket Nos. Q019010040 and Q020060389. August 24, 2020. bpu.state.nj.us/bpu/pdf/boardorders/2020/20200824/8A\%20-
    \%20ORDER\%20New\%20Jersey\%20Cost\%20Test.pdf.

[^49]:    ${ }^{1}$ The modified CIP modifies the current CIP that is in place for the gas distribution companies ("GDCs") and establishes a CIP that is designed for the electric distribution companies ("EDCs").

[^50]:    ${ }^{2}$ Rate Schedules: RS, MGS-Secondary, MGS-Primary, AGS-Secondary, AGS-Primary, TGS, DDC, CSL, SPL

[^51]:    FN1
    Per discussion with Erik Reeves, Sr. Manager of Tax, the tax depreciation will likely be 3-year MACRS (half year convention). However, amounts calculated under a 3-year straight-line method will not be materially different. Therefore, to simplify the model, we will use the 3 -year straight-line method for tax purposes

[^52]:    ${ }^{1}$ From latest base rate adjustment divided by billing determinants approved in the 2018 Base Rate Case

[^53]:    ${ }^{1}$ From latest base rate adjustment divided by billing determinants approved in the 2018 Base Rate Case

