BEFORE THE
ARKANSAS PUBLIC SERVICE COMMISSION

IN THE MATTER OF FORMULA RATE PLAN FILINGS OF ENTERGY ARKANSAS, INC. PURSUANT TO APSC DOCKET NO. 15-015-U	))))	DOCKET NO. 16-036-FR

2023 EVALUATION REPORT SETTLEMENT TESTIMONY

OF

AMY L. MORRIS

DIRECTOR, EAL FINANCE

ENTERGY SERVICES, LLC

ON BEHALF OF

ENTERGY ARKANSAS, LLC

OCTOBER 31, 2023

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND PURPOSE OF YOUR SETTLEMENT TESTIMONY.

A. My name is Amy L. Morris, and I am the same Amy L. Morris who previously filed testimony in this proceeding. I am submitting this settlement testimony to the Arkansas Public Service Commission ("APSC" or the "Commission") on behalf of Entergy Arkansas, LLC ("EAL" or the "Company") to support a proposed resolution of EAL's 2023 Evaluation Report filing. The Company, the APSC General Staff ("Staff"), the Office of Arkansas Attorney General Tim Griffin ("AG"), Arkansas Electric Energy Consumers, Inc. ("AEEC"), and Hospitals and Higher Education Group (hereinafter, the "Settling Parties") have carefully considered and discussed the issues and positions in this matter and were able to reach an agreement setting forth for the Commission a proposed resolution of all the issues in this proceeding. Accordingly, the Settling Parties contemporaneously with this testimony are filing a Joint Motion to Approve Settlement Agreement, Waive Hearing, and Excuse Witnesses. The Settlement Agreement ("Agreement") establishes EAL's Rate Schedule No. 44, Formula Rate Plan Rider ("Rider FRP") revenue change and rate adjustment, for the 2024 Projected Year that will become effective January 2, 2024, subject to the Commission's approval of the Agreement. The resulting clean and red-lined Attachments A, B, and D are provided in the Agreement as Settlement Agreement Exhibit A. Additionally, I note that although I highlight several areas where EAL continues to maintain its positions, that discussion is for purposes of making clear that EAL does not intend any of the settled commitments to be taken as having any precedential effect for future filings, which the Company appreciates is the same perspective shared by the other Settling Parties; my observations in that regard are not intended to undermine the Agreement or the hard efforts of the parties in reaching a proposed resolution. EAL believes, as I note further below, that the Agreement presents a just and reasonable result when taken as a whole.

II. SETTLEMENT AGREEMENT OVERVIEW

Q. PLEASE PROVIDE AN OVERVIEW OF THE SETTLEMENT TERMS SET FORTH IN THE AGREEMENT.

A. On July 7, 2023, EAL filed an Application with EAL's 2023 Rider FRP Evaluation Report filing stating that it was filed pursuant to and in compliance with the provisions of EAL's Rider FRP, including Attachment F, the Formula Rate Protocols, Ark. Code Ann. § 23-4-1201 *et seq.*, and the applicable APSC Rules of Practice and Procedure. The Agreement, which is the product of good faith negotiations, supports that the Settling Parties remain strong advocates for their positions in this proceeding, which certainly remains the case for EAL. Nevertheless, the Company believes that the outcome ultimately achieved under the Agreement, for purposes only of resolving matters set forth in EAL's 2023 Evaluation Report, produces a just and reasonable rate adjustment for customers and the Company for purposes of this year's Evaluation Report and therefore, is consistent with the public interest.

Specifically, the Settling Parties identified several issues as outlined below for purposes of the Agreement beyond EAL's Response to Errors and Objections. I also note that the Agreement starts from the Company's rebuttal case because that last round of pre-filed testimony accepted the update to revenues per Staff's case and corrected the CAOL calculation; thus, the Agreement includes EAL's rebuttal case except as otherwise modified by the Settlement Terms.[1] For purposes of settlement the Settling Parties agreed to several adjustments, an overview of which is set forth below including as to EAL's supporting perspective with respect to several of the issues:

- <u>State Accumulated Deferred Income Taxes ("ADIT")</u>: For purposes of the Agreement only, EAL will flow through Rider FRP as part of the Company's 2023 Evaluation Report the deficient ADIT balance of $10.2 million[2] related to [redacted] and from the changes in state income tax rates related to Acts 2, 532, and 6.

[1] The Company's 2023 Evaluation Report rebuttal case is comprised of the Company's Response to Errors and Objections; the rebuttal testimony of EAL witnesses J. David Palmer, Amy L. Morris, William J. Cunningham, and Michael P. Considine; and the direct testimony of EAL witnesses Lydia W. Joseph, Dedra Knighten, Matthew S. Klucher, William C. John, and Brad Cullipher and Mark E. Skartvedt, which remained unchanged after the filing of EAL's direct case.
[2] This total amount is estimated to be $13.6 million on a grossed-up basis.

- Payroll Expense: For purposes of the Agreement only, EAL will reduce Projected Year 2024 Operation and Maintenance ("O&M") base pay payroll expense, inclusive of payroll taxes and benefits, by $5,000,947 to adjust Projected Year 2024 O&M payroll expense by adjusting the projected headcount of Entergy Operations, Inc., EAL, and Entergy Services, LLC and reflecting the historical O&M/capital allocation.

- Feeder Level Investment Plan ("FLIP"): For purposes of the Agreement only, EAL will remove $26.6[3] million of capital, and the associated accumulated depreciation of $6 million and depreciation expense of $380,783, in the 2024 Projected Year for FLIP and will remove $2.4[4] million of O&M in the 2024 Projected Year for FLIP.

- Power Through: For purposes of the Agreement only, but with EAL's express reservation of all rights with respect to all future projects, EAL will remove $19.39 million in capital and the associated accumulated depreciation and depreciation expense, for the 2024 Projected Year only. For clarity, the Settling Parties agreed that this removal is not a disallowance and rather is structured to be only a revision to the level of costs included in the Projected Year 2024.

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[3] This amount is inclusive of the $9.2 million, EAL reflected in its rebuttal case.
[4] This amount is inclusive of the $835,011, EAL reflected in its rebuttal case.

- Solar Build-Own-Transfers ("BOT") /Prudence Process: The Agreement does not include an adjustment with respect to the BOT costs for the Walnut Bend Solar, West Memphis Solar, and Driver Solar facilities. I note further that the Agreement reflects the Settling Parties' agreement that they may reserve other rights to challenge costs but will not challenge the costs of the facilities that already were reviewed and found by the Commission to be prudent in Docket Nos. 20-052-U, 20-067-U, and 22-013-U.[5] Thus, the Agreement on this point reflects the prudence process confirmed by the Commission in Order No. 21 in this docket.

- Opportunity Sales Legal Fees: The Settling Parties accepted the following, for purposes only of the Agreement and only to reach an amicable resolution of the 2023 FRP filing matters:

    1. Filing Requirement Item No. 25 in the 2023 Evaluation Report identified the actual amount of legal fees incurred in 2022 to be $2,460,479.[6] The Settling Parties have determined that, as part of the current 2023 Evaluation Report filing, EAL will include as part of the 2022 Historical Year netting adjustment the total fees incurred in 2022 in the amount of $2,460,479.

    2. In this year's 2023 Evaluation Report, EAL included in Filing Requirement Item No. 26 a projection for the Opportunity Sales Fees portion of Account 923000 in the amount of $1,500,000 for Projected Year 2024.[7] The Settling Parties have determined that, conditioned expressly on each Settling Party fully reserving

[5] See Order Nos. 12, 13 and 15 in Docket No. 20-052-U, Order No. 9 in Docket No. 20-067-U, and Order No. 7 in Docket No. 22-0130U.
[6] Docket No. 16-036-FR (Doc. 902), Attachment E, Item 25, lines 563, 2262, 11112, 11477, 11723, 13322, 14895 and 15003 in page numbers 6, 22, 15, 109, 111, 126, 141, 142 respectively.
[7] Docket No. 16-036-FR, (Doc. 902), Attachment E, Item 26, page 2,538, line 9 (unnumbered).

all arguments and positions with respect to the Company's collection of such legal fees, including the legal issue of whether EAL is entitled to recover these fees and both prudence of action and prudence of costs, EAL will defer the 2024 Projected Year legal fees for purposes of the instant filing and will present in its filing request (subject to the Settling Parties' reservation of rights as stated above) the actual Opportunity Sales Fees incured in 2024 for review in the 2024 Historical Year netting adjustment.

- Vegetation Trim Cycle: Although this term was offered also in Staff's and EAL's pre-filed testimonies, the Settling Parties have included a term in the Agreement memorializing that before EAL files its next Evaluation Report, EAL and Staff will discuss opportunities to achieve EAL's vegetation management goals in a cost-effective manner.

Q. ARE THERE ANY OTHER ITEMS FROM THE AGREEMENT YOU WOULD LIKE TO DISCUSS?

A. Yes. In addition to the Settlement Terms above, the Settling Parties discussed the timing of EAL's next rate case and EAL's request for a COVID-19 regulatory asset. First, with respect to the timing of the next rate case, the Formula Rate Review Act ("FRRA") requires that EAL file its next rate case no later than in the last year of the Rider FRP extension, which is 2026.[8] The FRRA also requires that a public utility shall not file for an initial formula rate review until at least one hundred eighty (180) days after rates have become effective pursuant to the final order on the application for a

[8] Ark. Code Ann. § 23-4-1208.

general change in rates.[9] The Settling Parties agree that EAL will file its application in the rate case pursuant to that provision of the FRRA no later than February 27, 2026, in order to maintain its current FRP schedule and implementation date, unless otherwise expressly agreed in writing by the Settling Parties. Addressing this timing now before the Commission is intended to provide the Company and all parties (including the Commission) certainty for planning purposes as to when that rate case will be filed.

Second, EAL notes its request for recovery of a COVID-19 regulatory asset for the incremental bad debt incurred as a result of the suspension of disconnection of service pursuant to Order No.1 in Docket No. 20-012-A. The Settling Parties acknowledge that no party opposed EAL's request in paragraph 11 of EAL's 2023 FRP Application or the accounting treatment provided in Docket Nos. 17-010-FR and 21-070-U; the 13-month average of the balance of the regulatory asset is included in Other Rate Base for the 2022 Historical Year and the 2024 Projected Year. The Settling Parties further acknowledge that EAL's request for amortization of the regulatory asset over a ten-year period was not contested, is reasonable, and they request that it be granted.

[9] Ark. Code Ann. § 23-4-1205(C)(2)(A).

Q. DOES THE AGREED UPON RIDER FRP REVENUE CHANGE EXCEED THE LIMIT OF THE RIDER FRP REVENUE CONSTRAINT CALCULATION IN THIS FILING?

A. Yes. The agreed upon revenue change for the 2023 Evaluation Report is $129,019,913, which is comprised of a Projected Year 2024 deficiency of approximately $79.23 million and a deficiency of approximately $49.8 million in the 2022 Historical Year 2022 Netting Adjustment. Nevertheless, the Rider FRP Revenue Constraint after application of the adjustment for the Large General Service ("LGS") class is $87,715,932.

III. REVENUE RELATED SETTLEMENT ITEMS

Q. PLEASE EXPLAIN FURTHER THE ADJUSTMENT FOR PAYROLL.

A. For purposes of the Agreement only, EAL will reduce Projected Year 2024 operations and maintenance ("O&M") base pay payroll expense, inclusive of payroll taxes and benefits, by $5,000,947 by adjusting the projected headcount of Entergy Operations, Inc., EAL, and Entergy Services, LLC in a manner consistent with that proposed by Staff.[10] Additionally, the Projected Year payroll will be adjusted to reflect the historical O&M/capital allocation.[11] The Settling Parties agree that this adjustment is not a disallowance and rather that the netting of Historical Year 2024 will include actual payroll expenses, taxes, and employee benefits.

[10] See 2023 Evaluation Report Supporting Testimony of Michael L. Pitts at 9. See also 2023 Evaluation Report Rebuttal Testimony of Amy L. Morris at 17-19.
[11] See 2023 Evaluation Report Direct Testimony of Amy L. Morris at 50.

Q. PLEASE EXPLAIN THE ADJUSTMENT FOR FLIP.

A. After further discussions with the Settling Parties and consistent with the Settlement terms set forth in the Agreement, EAL will remove $26.6 million of capital, and the associated accumulated depreciation, in the 2024 Projected Year for FLIP and will remove $2.4 million of O&M in the 2024 Projected Year for FLIP to reflect for purposes of settlement only what the Settling Parties agreed would represent a reasonable projection for 2024.[12] Similar to other adjustments set forth in the Settlement Terms, this is not a disallowance, and EAL will submit actual costs incurred for FLIP during 2024 in the Historical Year Netting Adjustment.

Q. PLEASE ELABORATE ON THE POWER THROUGH ADJUSTMENT.

A. Consistent with the Settlement Terms in the Agreement, EAL will remove $19.4 million in capital and the associated accumulated depreciation for the 2024 Projected Year only. After further discussions with the Settling Parties, EAL has accepted this as a reasonable projection for 2024 but notes that this program continues to be in significant demand by customers.[13] This is not a disallowance and, consistent with the Company's reservation in the Agreement, EAL will seek to recover such actual costs associated with Power Through in the 2024 Historical Year Netting

[12] See 2023 Evaluation Report Rebuttal Testimony of Michael C. Considine at 3-8.
[13] 2023 Evaluation Report Rebuttal Testimony of William J. Cunningham at 11-13.

Adjustment. Setting aside this adjustment, I would like to reiterate that the record in Docket No. 20-049-U demonstrates that there is a significant level of customer interest in Power Through as I have noted. Specifically, EAL has received 43 letters of interest ("LOIs") representing greater than the 75 MWs of generation EAL sought in Docket No. 20-049-U. In addition to the LOIs, 21 public comments have been submitted in that docket, which further demonstrate the customer support for Power Through.[14] Accordingly, EAL has agreed to make an adjustment with respect to Power Through in the FRP only for purposes of achieving a settlement with the other parties but with an express affirmation that Power Through remains a high priority for the Company and its customers.

Q. PLEASE EXPLAIN THE SETTLEMENT TERM RELATED TO ADIT.

A. Consistent with the terms of the Agreement, EAL will flow through Rider FRP the deficient ADIT balance of $10.2 million[15] [redacted], and from changes in state income tax rates related to Acts 2, 535, and 6. With respect to Act 6, EAL is attaching as <u>EAL 2023 Evaluation Report Settlement Exhibit ALM-1</u>, a copy of the addendum response to Staff data request APSC 176-2 which provides the estimated excess ADIT as a result of the state income tax rate

[14] Thompson Rebuttal Testimony in Docket No. 20-049-U at 3-4.
[15] This total amount is estimated to be $13.6 million on a grossed-up basis.

change from 5.1 percent to 4.8 percent. EAL accepts the inclusion of these ADIT impacts in this Rider FRP only for purposes of achieving a global settlement with the other parties but continues to maintain its position with respect to future filings that deficient and excess ADIT amounts are appropriate for inclusion in EAL's Tax Adjustment Rider ("Rider TA"), as has been done before. To the extent future changes in Federal or State tax code, or [redacted] result in additional deficient and/or excess ADIT, the Company continues to believe that Rider TA, or a similar mechanism, would be the appropriate means of reflecting both any resulting net credit or net charge to customers.

Q. PLEASE EXPLAIN THE TERM RELATED TO THE SOLAR BOTS.

A. Despite the prudence findings already issued by the Commission in Docket Nos. 20-052-U, 20-067-U, and 22-013-U, AEEC challenged the inclusion of the capital costs of three solar BOT projects included in EAL's Application in the 2024 Projected Year, and the AG challenged the inclusion of the capital costs of two of the three solar BOT projects. Staff served a discovery request to EAL seeking comparison of the costs EAL included in this FRP filing to those approved in the solar BOT proceedings. EAL attached that discovery in highly sensitive <u>EAL Rebuttal Exhibit WJC-2</u>, and as noted, EAL's response confirmed that there are no material differences between the costs in the FRP filing and those previously approved in the resource approval dockets. Staff did not propose an adjustment with respect to the three solar BOTs. The Agreement does not include an adjustment with respect to the BOT costs for these three solar projects for 2024. Although AEEC and each Settling Party reserves all rights it may have to challenge, consistent with applicable legal authorities including Order No. 21 in Docket No. 16-036-FR, another party's position, claim, or similar request, the Settling Parties also expressly agree that nothing in the Agreement contradicts the Commission's findings, including as to prudence of cost and prudence of action, set forth in the Commission's orders in Docket Nos. 20-052-U, 20-067-U, and 22-013-U.[16]

Q. PLEASE EXPLAIN THE ADJUSTMENT RELATED TO THE LEGAL FEES RELATED TO THE OPPORTUNITY SALES CASE.

A. For purposes of settlement, EAL will include in the 2022 Historical Year the total fees incurred in 2022 in the amount of $2,460,479. For the Projected Year 2024, EAL will remove the projected year costs of $1,500,000 related to the Opportunity Sales Fees portion of Account 923000, and EAL will include the actual Opportunity Sales legal fees incured in 2024 for review and consideration in the 2024 Historical Year as part of its 2025 Evaluation Report. EAL fully reserves all arguments and positions with respect to the Company's legal right to collect these legal fees. As explained by Company witness David Palmer, both the Federal Energy Regulatory Commission

[16] Attached collectively as highly sensitive EAL Rebuttal Exhibit WJC-1 are the relevant terms incorporated in the approval orders in Docket Nos. 20-052-U, 20-067-U and 22-013-U supporting recovery of the costs associated with the approved solar resources through Rider FRP.

and the APSC have routinely permitted the recovery of legal fees in rates because they are a well established cost of doing business.[17]

IV. CUSTOMER BILL IMPACTS

Q. WHAT ARE THE BILLING FACTORS RESULTING FROM THE AGREEMENT?

A. After allocating the agreed upon revenue adjustment to the rate classes using the rate class allocation percentages on Line 2 of Attachment A.2 - Extension, the revised billing factors are included below in Table 2.

Table 2
Formula Rate Plan Rate Adjustments

Rate Class	FRP Rate (%)
Residential	38.1057%
Small General Service ("SGS")	36.0355%
LGS	36.4513%
Lighting	36.3467%

Q. WHAT ARE THE CUSTOMER BILL IMPACTS RESULTING FROM THE AGREEMENT?

A. For a customer in the residential customer class using 1,000 kWh per month, the agreed upon increase in Total Rider FRP Revenue would result in a corresponding bill increase of $5.49 per month, or a change of approximately 4.25 percent.

For the SGS and LGS customer classes, actual bill impacts would depend on a customer's usage characteristics such as size, usage, and

[17] 2023 Evaluation Report Rebuttal Testimony of J. David Palmer at 13.

load factor. However, for an SGS customer using seven kW with a load factor of 20 percent, the agreed upon increase in Total Rider FRP Revenue would result in an increase of 4.53 percent to a total bill. An LGS customer using 165 kW with a load factor of 55 percent would see a 3.77 percent increase due to the proposed Total Rider FRP Revenue change. See EAL 2023 Evaluation Report Settlement Exhibit ALM-2 for the updated EAL Direct Exhibit MSK-7 showing the revised year-over-year and cumulative customer bill impacts.

V. NON-REVENUE RELATED MATTERS

Q. DID THE SETTLING PARTIES AGREE TO OTHER MATTERS BESIDES THE REVISED RIDER FRP REVENUE CALCULATION AS DESCRIBED ABOVE?

A. Yes. As noted above with respect to EAL's vegetation trim cycle, before EAL files its next Evaluation Report, EAL and Staff will discuss opportunities to achieve EAL's vegetation management goals in a cost-effective manner.

VI. CONCLUSION

Q. DOES EAL SUBMIT THAT THE AGREEMENT PRODUCES A JUST AND REASONABLE RESULT?

A. Yes. While it remains a fierce advocate for its positions, the Company submits that the ultimate result under the Agreement has been supported by the evidence presented in the proceeding to be just and reasonable and to align with the goals of providing financial stability for EAL while gradually reflecting investments in rates.

Q. DOES THIS CONCLUDE YOUR 2023 EVALUATION REPORT SETTLEMENT TESTIMONY?

A. Yes, at this time, although I would like to take another opportunity to express the Company's gratitude to the other Settling Parties for their hard work in reaching this proposal to present to the Commission.

CERTIFICATE OF SERVICE

I, J. David Palmer, do hereby certify that a copy of the foregoing has been served upon all parties of record by forwarding the same by electronic mail and/or first class mail, postage prepaid, this 31st day of October, 2023.

/s/ J. David Palmer
J. David Palmer

BEFORE THE
ARKANSAS PUBLIC SERVICE COMMISSION

IN THE MATTER OF FORMULA RATE PLAN FILINGS OF ENTERGY ARKANSAS, INC. PURSUANT TO APSC DOCKET NO. 15-015-U	))))	DOCKET NO. 16-036-FR

HIGHLY SENSITIVE EAL 2023 EVALUATION REPORT SETTLEMENT
EXHIBIT ALM-1

EAL'S RESPONSE TO APSC 176-2

HIGHLY SENSITIVE PROTECTED INFORMATION PROVIDE PURSUANT TO APSC ORDER NO. 1 DATED JUNE 20, 2016

BEFORE THE
ARKANSAS PUBLIC SERVICE COMMISSION

IN THE MATTER OF FORMULA RATE PLAN FILINGS OF ENTERGY ARKANSAS, INC. PURSUANT TO APSC DOCKET NO. 15-015-U	))))	DOCKET NO. 16-036-FR

EAL 2023 EVALUATION REPORT SETTLEMENT EXHIBIT ALM-2

REVISED YEAR-OVER-YEAR AND CUMULATIVE CUSTOMER BILL IMPACTS

Entergy Arkansas, LLC
Formula Rate Plan
Year over Year and Cumulative Customer Impacts
Through December 31, 2024

		2017 Revenue Changes			2018 Revenue Changes				
Rate Class	Total Retail Sales Revenue for 2017 Before Rider FRP Changes (1)	2017 FRP Revenue Change*	% Increase (Decrease) Total Revenue	Total Retail Sales Revenue including 2017 FRP Revenue Change	2018 FRP Revenue Change**	Year over Year % Increase (Decrease) Total Revenue	Cumulative FRP Revenue Change	Cumulative % Increase (Decrease) Total Revenue	Total Retail Sales Revenue including 2018 FRP Revenue Change
(a)	(b)	(c)	(d) = (c) / (b)	(e) = (b) + (c)	(f)	(g) = (f) / (e)	(h) = (c) + (f)	(i) = (h) / (b)	(j) = (b) + (h)
Residential	756,310,368	25,024,526	3.31%	781,334,894	31,541,762	4.04%	56,566,288	7.48%	812,876,656
Small General Service	402,958,342	14,027,047	3.48%	416,985,390	16,931,987	4.06%	30,959,035	7.68%	433,917,377
Large General Service	562,893,780	14,392,298	2.56%	577,286,078	21,230,592	3.68%	35,622,890	6.33%	598,516,670
Lighting	35,340,497	1,003,146	2.84%	36,343,643	1,362,083	3.75%	2,365,230	6.69%	37,705,727
Total	1,757,502,987	54,447,018	3.10%	1,811,950,004	71,066,425	3.92%	125,513,442	7.14%	1,883,016,429

	2019 Revenue Changes					2020 Revenue Changes				
Rate Class	2019 FRP Revenue Change***	Year over Year % Increase (Decrease) Total Revenue	Cumulative FRP Revenue Change	Cumulative % Increase (Decrease) Total Revenue	Total Retail Sales Revenue including 2019 FRP Revenue Change	2020 FRP Revenue Change****	Year over Year % Increase (Decrease) Total Revenue	Cumulative FRP Revenue Change	Cumulative % Increase (Decrease) Total Revenue	Total Retail Sales Revenue including 2020 FRP Revenue Change
(k)	(l)	(m) = (l) / (j)	(n) = (h) + (l)	(o) = (n) / (b)	(p) = (b) + (n)	(q)	(r) = (q) / (p)	(s) = (n) + (q)	(t) = (s) / (b)	(u) = (b) + (s)
Residential	31,877,321	3.92%	88,443,608	11.69%	844,753,976	4,648,198	0.55%	93,091,806	12.31%	849,402,174
Small General Service	14,326,896	3.30%	45,285,930	11.24%	448,244,273	2,605,464	0.58%	47,891,394	11.88%	450,849,737
Large General Service	19,317,760	3.23%	54,940,650	9.76%	617,834,430	2,673,308	0.43%	57,613,958	10.24%	620,507,738
Lighting	1,168,742	3.10%	3,533,972	10.00%	38,874,469	186,331	0.48%	3,720,303	10.53%	39,060,800
Total	66,690,719	3.54%	192,204,161	10.94%	1,949,707,148	10,113,301	0.52%	202,317,462	11.51%	1,959,820,449

	2021 Revenue Changes					2022 Revenue Changes				
Rate Class	2021 FRP Revenue Change*****	Year over Year % Increase (Decrease) Total Revenue	Cumulative FRP Revenue Change	Cumulative % Increase (Decrease) Total Revenue	Total Retail Sales Revenue including 2021 FRP Revenue Change	2022 FRP Revenue Change******	Year over Year % Increase (Decrease) Total Revenue	Cumulative FRP Revenue Change	Cumulative % Increase (Decrease) Total Revenue	Total Retail Sales Revenue including 2022 FRP Revenue Change
(v)	(w)	(x) = (w) / (u)	(y) = (s) + (w)	(z) = (y) / (b)	(aa) = (b) + (n)	(ab)	(ac) = (aa) / (ab)	(ad) = (y) + (ab)	(ae) = (ad) / (b)	(af) = (b) + (ad)
Residential	18,276,679	2.15%	111,368,485	14.73%	867,678,853	35,949,335	4.14%	147,317,820	19.48%	903,628,188
Small General Service	10,244,664	2.27%	58,136,058	14.43%	461,094,401	17,892,291	3.88%	76,028,349	18.87%	478,986,692
Large General Service	10,511,424	1.69%	68,125,382	12.10%	631,019,162	17,067,557	2.70%	85,192,939	15.13%	648,086,719
Lighting	732,650	1.88%	4,452,953	12.60%	39,793,450	1,231,656	3.10%	5,684,609	16.09%	41,025,106
Total	39,765,417	2.03%	242,082,879	13.77%	1,999,585,866	72,140,839	3.61%	314,223,718	17.88%	2,071,726,705

	2023 Revenue Changes					2024 Revenue Changes				
Rate Class	2023 FRP Revenue Change*******	Year over Year % Increase (Decrease) Total Revenue	Cumulative FRP Revenue Change	Cumulative % Increase (Decrease) Total Revenue	Total Retail Sales Revenue including 2023 FRP Revenue Change	2023 FRP Revenue Change*******	Year over Year % Increase (Decrease) Total Revenue	Cumulative FRP Revenue Change	Cumulative % Increase (Decrease) Total Revenue	Total Retail Sales Revenue including 2023 FRP Revenue Change
(ag)	(ah)	(ai) = (af) / (ah)	(aj) = (ad) + (ah)	(ak) = (aj) / (b)	(al) = (b) + (aj)	(am)	(an) = (am) / (al)	(ao) = (aj) + (am)	(ap) = (ao) / (b)	(aq) = (b) + (ao)
Residential	39,326,375	4.35%	186,644,195	24.68%	942,954,563	41,583,259	4.41%	228,227,454	30.18%	259,769,216
Small General Service	19,908,869	4.16%	95,937,218	23.81%	498,895,561	22,204,852	4.45%	118,142,070	29.32%	135,074,058
Large General Service	18,967,354	2.93%	104,160,293	18.50%	667,054,073	22,158,632	3.32%	126,318,925	22.44%	147,549,517
Lighting	1,524,436	3.72%	7,209,045	20.40%	42,549,542	1,769,189	4.16%	8,978,234	25.40%	10,340,317
Total	79,727,034	3.85%	393,950,752	22.42%	2,151,453,739	87,715,932	4.08%	481,666,684	27.41%	552,733,109

(1) Includes Base, Rider and Other Revenues and ties to the amount used for the 4% cap calculation in the Compliance Att. A.2 in the Filing Year 2016 Rider FRP. This will be the base amount used each year to calculate cumulative Rider FRP effects.

Rate Class	*2017 FRP Billing Rates	**2018 FRP Billing Rates	***2019 FRP Billing Rates	****2020 FRP Billing Rates	*****2021 FRP Effective Rates	******2022 FRP Billing Rates	*******2023 FRP Billing Rates	********2024 FRP Billing Rates
Residential	4.3434%	9.2836%	15.1249%	15.7350%	18.6023%	24.6535%	31.2090%	38.1057%
Small General Service	4.4471%	9.3096%	13.9199%	14.3791%	16.6006%	22.3217%	28.7900%	36.0355%
Large General Service	3.5030%	9.8485%	15.6625%	16.2854%	18.7082%	23.8544%	29.9063%	36.4513%
Lighting	3.2440%	8.9583%	13.6199%	14.7499%	18.2692%	23.1894%	29.2792%	36.3467%