BEFORE THE CORPORATION COMMISSION

OF THE STATE OF KANSAS

In the Matter of the Application of The Empire District Electric Company for Approval to Make Certain Changes in Its Charges for Electric Service	]]]]	KCC Docket No. 11-EPDE-856-RTS

DIRECT TESTIMONY OF

BRIAN KALCIC

RE: RESIDENTIAL AND SMALL GENERAL SERVICE RATE STRUCTURE

ON BEHALF OF

THE CITIZENS' UTILITY RATEPAYER BOARD

October 12, 2011

Q. Please state your name and business address.

A. Brian Kalcic, 225 S. Meramec Avenue, St. Louis, Missouri 63105.

Q. What is your occupation?

A. I am an economist and consultant in the field of public utility regulation, and principal of Excel Consulting. My qualifications are described in the Appendix to this testimony.

Q. On whose behalf are you testifying in this case?

A. I am testifying on behalf of the Citizens' Utility Ratepayer Board ("CURB").

Q. What is the subject of your testimony?

A. I will review Empire's current and proposed residential rate structure. Consistent with CURB's policy position regarding conservation, I will also sponsor a more conservation-oriented residential rate structure to be implemented at the conclusion of this proceeding.

In addition, I will discuss the Company's proposed small general service ("SGS") rate structure, and sponsor conservation-oriented changes, where appropriate.

Q. Have you reflected CURB witness Andrea C. Crane's recommended revenue adjustment for Empire in your alternative rate design proposals?

A. Yes, I have.

Q. Please summarize your primary recommendations.

A. Based upon my analysis of Empire's filing and interrogatory responses, I recommend that the Kansas Corporation Commission ("KCC" or "Commission"):

- reject the Company's proposed across-the-board residential rate design;
- adopt CURB's revised residential rate design which would continue to phase-out the Company's existing declining block energy charges, so as to promote conservation;
- reject Empire's proposed across-the-board SGS rate design; and
- adopt CURB's revised SGS rate design which would continue to phase-out the Company's existing SGS declining block energy charges.

The specific details associated with the above recommendations are discussed below.

Residential Rate Structure

Q. Mr. Kalcic, please provide a brief description of Empire's current residential service rate schedules.

A. The Company serves residential customers via two (2) rate schedules: a) Residential Service (RG); and b) Residential Total Electric Service (RH). In addition, Empire offers a separate (discounted) rate to RG customers that use an electric water heater (RGW). The majority (69.7%) of Empire's residential customers take service under Rate RG.

The RG rate schedule contains a customer charge and a declining-block energy charge, which is not seasonally differentiated. Approximately 9.7% of residential customers are eligible for the Company's RGW water heating rate, which includes a 10.0% discount (off of the corresponding RG rate) for the first 600 kWh used each month. All

RGW customers pay the same rate as RG customers for usage in excess of 600 kWh per month. Finally, the RH rate schedule contains a customer charge and a flat rate energy charge that is not seasonally differentiated.

Q. Does the Company propose to revise its residential rate *structure* in this proceeding?

A. No, it does not.

Q. Have you provided a summary of the Company's proposed residential rate design in this case?

A. Yes, I have. The Company's present and proposed residential tariff charges are summarized in Schedule BK-1. As shown in column 4 of Schedule BK-1, Empire is proposing to assign a uniform increase of approximately 9.71% to all of its existing base rate charges.

Q. Does CURB agree with the Company's proposed across-the-board residential rate design in this proceeding?

A. No. As I discuss below, CURB recommends certain revisions to Empire's residential rate design in order to phase out the Company's existing declining block energy charges, which fail to provide appropriate price signals to consumers to conserve electricity. Accordingly, I have prepared an alternative residential rate design for the Commission's consideration in this proceeding.

Q. Why does CURB believe that it is appropriate to move toward a more conservation-oriented residential rate structure in this case?

A. CURB's Consumer Counsel informs me that the Commission has the authority to adjust utility rate structures to accomplish desired goals such as conservation. As a matter of public policy, it is CURB's position that the Commission can, and should, encourage conservation by revising existing rate structures to provide stronger conservation-oriented price signals. Many Kansas electric utilities (such as Empire) are currently adding and improving generation facilities and making massive capital expenditures to serve growing demand. Greater conservation, if achieved, will help consumers manage rising electric utility bills in the coming years and delay the need for additional generation units.

Q. Couldn't a significant revision to Empire's existing rate structure exacerbate the rate increases that will be experienced by certain residential customers?

A. Yes. CURB is cognizant of that possibility. In its comments to the Commission in Docket No. 08-GIMX-442-GIV, CURB stated, in pertinent part:

> [W]ith respect to rate impacts on consumers that may result from adjusting the current rate structure or from moving to real-time pricing, the Commission must also be an active participant in the creation of mechanisms or rate structures that protect the most vulnerable of our citizens. . . . CURB encourages the Commission to join with CURB, the utilities and other intervenors, where appropriate, in finding mechanisms to make sure there are rate protections and affordability programs for our low-income and fixed-income customers. For example, rate design should ensure that the first block of usage remains affordable for all customers. Rate blocks above this first block can be adjusted upward, if necessary.[1]

[1] *Comments of the Citizens' Utility Ratepayer Board*, Dec. 21, 2007, pp. 7-8, KCC Docket No, 08-GIMX-442-GIV.

In other words, CURB finds that an appropriate residential rate design would encourage conservation while at the same time providing a measure of affordability over a "first block" or baseline level of customer usage. Usage in excess of the baseline level would be subject to significantly greater pricing for all customers.

Q. Mr. Kalcic, which specific feature(s) of the Company's existing residential rate structure does CURB wish to address at this time?

A. CURB opposes the Company's existing declining block energy charges, which are applicable year round for Empire's RG and RGW customers. As currently configured, the Company's tariff provides a discount for increased consumption, beginning with the 601st kWh consumed by a customer. Such discounts encourage rather than discourage consumption, and thus send the wrong price signal to customers.

Q. Does CURB recommend eliminating all of Empire's declining block residential rates in this proceeding?

A. No. As I discuss below, CURB's recommended rate design would simply continue the phase-out of the Company's declining block energy charges that began with Empire's last base rate case in KCC Docket No. 10-EPDE-314-RTS ("Docket 314").

Q. Have you prepared a revised residential rate design and proof of revenue for this proceeding?

A. Yes, in Schedule BK-2.

Q. Please describe Schedule BK-2.

A. Schedule BK-2 consists of six (6) columns. Column 1 contains the pro forma residential billing determinants that were approved by the KCC in Docket 314. Column 2 contains the Company's present base rates. Column 3 shows the present revenue that is derived from multiplying the pro forma billing determinants in column 1 by the present rates shown in column 2. CURB's revised rates are shown in column 4, and its revised revenue is provided in column 5. Finally, column 6 shows the percentage change in revenues under CURB's recommended rate design.

As shown on line 21, columns 5-6 of Schedule BK-2, CURB's recommended rate design would produce total residential base rate revenues of $8.557 million, which equates to a base rate increase of 7.15%.

Q. How did you determine the level of the residential base rate increase shown in line 21 of Schedule BK-2?

A. Ms. Crane is recommending that Empire receive a total base rate increase of $1.129 million on total base revenues of $15.809 million, or an increase of 7.14%. Consistent with the Company's proposal to assign an across-the-board increase to all rate classes, I assigned a system average increase of 7.14% to Empire's residential rate classes.[2]

Q. How do CURB's recommended residential rates compare to the Company's proposed rates?

[2] CURB's recommended residential increase *after rate design* is 7.15%, which reflects a rounding error of $584.

A. CURB's revised residential rate design adopts the Company's approach of assigning a system-average increase to customer charges. However, as shown in column 4, lines 6, 9, 12 and 15 of Schedule BK-2, CURB's recommended rate design would include an increase of 1.7 times the system average to the second RG/RGW rate block, in order to continue the phase-out of the Company's existing declining block energy charges. Doing so would reduce the RG discount (for usage in excess of 600 kWh per month) from approximately 1.0¢ per kWh at present rates to 0.5¢ per kWh under CURB's recommended rates.

Q. How did you determine the increase to be assigned to the first RG and RGW rate blocks?

A. As a result of assigning an above-average increase to the second RG/RGW rate block, the first RG and RGW rate blocks receive a below (system) average increase. In particular, the first RG and RGW rate blocks were assigned the residual increase necessary to recover the combined RG/RGW revenue requirement, while maintaining approximately the same RGW percentage discount for the first 600 kWh used each month.

Q. Mr. Kalcic, do you agree with the current rate design applicable to Empire's RH (electric heating) customers?

A. No. At the present time, RH customers receive a discount on *every kWh consumed, in every month.* That is inappropriate. If RH customers are entitled to any discount from the standard rates paid by RG customers, that discount should apply only to their electric heating load in the winter. Stated differently, all else equal, the charges paid by RH

customers should be identical to those paid by RG customers, except for usage during the winter.

Q. How did you determine the level of CURB's recommended RH consumption charges shown in Schedule BK-2?

A. First, I set the RH *summer* energy charge equal to the second block rate of 6.230¢ per kWh to be paid by RG (and RGW) customers. This step is intended to phase-out the discount that RH customers currently receive during the summer months. Second, I set the RH *winter* energy charge at the residual level necessary to recover the total RH revenue requirement.

Q. Does CURB's recommended RH rate design impact the average annual discount currently received by electric heating customers?

A. No. Since CURB has assigned a system average increase to the RH subclass, the average annual rate discount received by electric heating customers is unaffected. However, CURB's recommended rate design does affect the seasonal discounts received by RH customers.

Q. How should Empire determine its applicable residential water heating and all electric discounts in its next rate proceeding?

A. Going forward, CURB recommends that the Company justify its effective RGW discount and RH discount based on documented differences in class cost of service. In addition, any

RH discount should be restricted to *heating load* during the winter season, so as not to encourage consumption during the summer cooling season.

Q. Have you summarized CURB's recommended increases to the Company's residential classes?

A. Yes. Schedule BK-3 shows the residential increases produced by CURB's recommended rate design. As shown in Schedule BK-3, such increases would range from 7.06% (for RG) to 7.78% (for RGW). The RH class would receive an (approximate system average) increase of 7.13%.

Q. Mr. Kalcic, would you please summarize CURB's rate design recommendations for the Company's residential rate classes?

A. Yes. CURB recommends that the Commission direct Empire to: a) assign a system average increase to all residential customer charges; b) assign an increase of 1.7 times the system average to the second RG/RGW rate block; c) set the consumption charge for the first RG/RGW rate block at the residual level needed to recover the combined RG/RGW revenue requirement; d) set the RH summer energy charge equal to the second block rate to be paid by RG (and RGW) customers; and e) set the RH winter energy charge at the residual level necessary to recover the total RH revenue requirement.

The above rate design guidelines should be implemented after the Commission has determined both the Company's overall revenue requirement, and individual customer class revenue targets.

SGS Rate Structure

Q. Mr. Kalcic, please provide a brief description of the Company's current SGS rate schedules.

A. For purposes of this proceeding, Empire's SGS class may be defined to include the following two (2) rate schedules: a) Commercial Service (CB); and b) Small Heating Service (SH). The CB rate schedule is available to non-residential customers with an electric load less than or equal to 40 kW. Rate CB contains a customer charge and a declining-block energy charge. There is no demand charge or seasonally differentiated energy charge.

The SH rate schedule is available to non-residential customers using electric space-heating equipment that exhibit a total electric load less than or equal to 40 kW. Like Rate CB, the SH rate schedule contains a customer charge and a declining-block energy charge. There is no demand charge or seasonally-differentiated energy charge.

Q. Does the Company propose to revise its SGS rate structure in this proceeding?

A. No. As shown in Schedule BK-4, the Company is proposing to assign an across-the-board increase of approximately 9.71% to all SGS tariff charges.

Q. Does CURB accept the Company's proposed across-the-board SGS rate design in this proceeding?

A. No. CURB opposes the Company's declining block SGS rate structure since it does not promote conservation.

Q. Does CURB recommend eliminating all of Empire's declining block SGS energy charges in this proceeding?

A. No. As I discuss below, CURB's recommended rate design continues the phase-out of the Company's declining-block energy charges that began in Docket 314.

Q. What type of SGS rate design does CURB recommend?

A. CURB's recommended SGS rate design is shown in Schedule BK-5. In general, CURB's revised rate design adopts the Company's approach of assigning a system-average increase to customer charges. However, as shown in column 4, lines 6 and 9 of Schedule BK-5, CURB's recommended rate design would assign an increase of approximately 1.5 times the system average to the second CB rate block, so as to continue the phase-out of Empire's declining block energy charges. Doing so would reduce the CB discount (for usage in excess of 700 kWh per month) by 50%, or from 1.54¢ per kWh at present rates to 0.77¢ per kWh under CURB's recommended rates.

Q. How did you determine the increase to be assigned to the first CB rate block?

A. The first CB rate block was assigned the residual increase necessary to recover the total CB revenue requirement.

Q. Please explain how you determined the SH energy charge levels shown in column 4 of Schedule BK-5.

A. CURB's recommended SH rate design approach is similar to that used for the CB class. First, I assigned an increase of approximately 1.5 times the system average to the second

SH rate block, so as to continue the phase-out of Empire's declining block energy charges. Second, I assigned the residual increase necessary to recover the SH revenue requirement to the first rate block. Combined, these steps act to reduce the current discount applicable to SH usage in excess of 1000 kWh per month by 50%, or from 1.18¢ per kWh at present rates to 0.59¢ per kWh under CURB's recommended rates

Q. Does CURB's recommended SGS rate design make reasonable progress toward eliminating the Company's declining block rate structure?

A. I believe it does. CURB's rate design would reduce the existing CB and SH second block discounts by 50%, without imposing unreasonable rate impacts on SGS customers. CURB recommends that the Commission eliminate the remaining SGS second block discounts in Empire's next rate proceeding.

Q. How did you determine the level of the SGS base rate increase shown on line 17 of Schedule BK-5?

A. I assigned CURB's recommended system-average increase of 7.14% to Empire's SGS rate class.

Q. Have you summarized CURB's recommended increases to the Company's SGS subclasses?

A. Yes. Schedule BK-6 shows the SGS increases produced by CURB's recommended rate design. As shown in Schedule BK-6, the CB and SH classes would each receive a system-average increase.

Q. Mr. Kalcic, do Empire's existing General Power Service (GP) and Total Electric Building Service (TEB) rate schedules also contain declining block energy charges?

A. Yes. While CURB is not sponsoring alternative rate designs for the above rate schedules in this case, CURB recommends that the Company examine and promote more conservation-oriented rate structures, where feasible, for its larger commercial and industrial customers in future rate proceedings.

Q. Does this conclude your direct testimony?

A. Yes.

VERIFICATION

STATE OF MISSOURI)
) ss:
COUNTY OF ST. LOUIS)

I, Brian Kalcic, of lawful age, being first duly sworn upon his oath states:

That he is a consultant for the Citizens' Utility Ratepayer Board; that he has read the above and foregoing Testimony, and, upon information and belief, states that the matters therein appearing are true and correct.

Brian Kalcic

SUBSCRIBED AND SWORN to before me this 10th day of October, 2011.

Notary of Public

My Commission expires:

" NOTARY SEAL"
Janet M. Roseman, Notary Public
St. Louis County, State of Missouri
My Commission Expires 8/10/2014
Commission Number 10429986

APPENDIX

Qualifications of Brian Kalcic

Mr. Kalcic graduated from Illinois Benedictine College with a Bachelor of Arts degree in Economics in December 1974. In May 1977 he received a Master of Arts degree in Economics from Washington University, St. Louis. In addition, he has completed all course requirements at Washington University for a Ph.D. in Economics.

From 1977 to 1982, Mr. Kalcic taught courses in economics at both Washington University and Webster University, including Microeconomic and Macroeconomic Theory, Labor Economics and Public Finance.

During 1980 and 1981, Mr. Kalcic was a consultant to the Equal Employment Opportunity Commission, St. Louis District Office. His responsibilities included data collection and organization, statistical analysis and trial testimony.

From 1982 to 1996, Mr. Kalcic was employed by the firm of Cook, Eisdorfer & Associates, Inc. During that time, he participated in the analysis of electric, gas and water utility rate case filings. His primary responsibilities included cost-of-service and economic analysis, model building, and statistical analysis.

In March 1996, Mr. Kalcic founded Excel Consulting, a consulting practice that offers business and regulatory analysis.

Mr. Kalcic has previously testified before the state regulatory commissions of Delaware, Kansas, Kentucky, Maine, Massachusetts, Minnesota, Missouri, New Jersey, New York, Ohio, Oregon, Pennsylvania, and Texas, and also before the Bonneville Power Administration.

SCHEDULES BK-1 THROUGH BK-6

EMPIRE DISTRICT ELECTRIC COMPANY
Summary of Present and Proposed Residential Base Rates

Line	Description	Present Rates	Proposed Rates	Proposed Increase	
				Amount	Percent
		(1)	(2)	(3)	(4)
	Customer Charge				
1	RG	$13.00	$14.26	$1.26	9.69%
2	RGW	$13.00	$14.26	$1.26	9.69%
3	RH	$13.00	$14.26	$1.26	9.69%
	Energy Charge				
	RG--Summer				
4	First 600 kWh	$0.06538	$0.07173	$0.00635	9.71%
5	All add'l kWh	$0.05557	$0.06097	$0.00540	9.72%
	RG--Winter				
6	First 600 kWh	$0.06538	$0.07173	$0.00635	9.71%
7	All add'l kWh	$0.05557	$0.06097	$0.00540	9.72%
	RGW--Summer				
8	First 600 kWh	$0.05884	$0.06456	$0.00572	9.72%
9	All add'l kWh	$0.05557	$0.06097	$0.00540	9.72%
	RGW--Winter				
10	First 600 kWh	$0.05884	$0.06456	$0.00572	9.72%
11	All add'l kWh	$0.05557	$0.06097	$0.00540	9.72%
	RH--Summer				
12	All kWhs	$0.05230	$0.05738	$0.00508	9.71%
	RH--Winter				
13	All kWhs	$0.05230	$0.05738	$0.00508	9.71%

Schedule BK-2

EMPIRE DISTRICT ELECTRIC COMPANY

CURB Recommended Residential Rate Design and Proof of Revenue

Line	Description	Pro Forma Billing Determinants	Present Rates	Present Revenue	CURB Rates	CURB Revenue	Percentage Change in Revenues
		(1)	(2)	(3) = (1)*(2)	(4)	(5) = (1)*(4)	(6) = (5)/(3)
	Customer Charge						
1	RG	72,008	$13.00	$936,104	$13.92	$1,002,351	7.08%
2	RGW	9,984	$13.00	$129,792	$13.92	$138,977	7.08%
3	RH	21,350	$13.00	$277,550	$13.92	$297,192	7.08%
4	Subtotal	103,342		$1,343,446		$1,438,520	7.08%
	Energy Charge						
	RG--Summer						
5	First 600 kWh	7,076,194	$0.06538	$462,642	$0.06730	$476,228	2.94%
6	All add'l kWh	10,657,879	$0.05557	$592,258	$0.06230	$663,986	12.11%
7	Subtotal Summer	17,734,073		$1,054,900		$1,140,214	8.09%
	RG--Winter						
8	First 600 kWh	27,877,026	$0.06538	$1,822,600	$0.06730	$1,876,124	2.94%
9	All add'l kWh	22,768,138	$0.05557	$1,265,225	$0.06230	$1,418,455	12.11%
10	Subtotal Winter	50,645,164		$3,087,825		$3,294,579	6.70%
	RGW--Summer						
11	First 600 kWh	1,030,467	$0.05884	$60,633	$0.06060	$62,446	2.99%
12	All add'l kWh	1,827,097	$0.05557	$101,532	$0.06230	$113,828	12.11%
13	Subtotal Summer	2,857,564		$162,165		$176,274	8.70%
	RGW--Winter						
14	First 600 kWh	4,337,610	$0.05884	$255,225	$0.06060	$262,859	2.99%
15	All add'l kWh	4,839,395	$0.05557	$268,925	$0.06230	$301,494	12.11%
16	Subtotal Winter	9,177,005		$524,150		$564,353	7.67%
	RH--Summer						
17	All kWhs	5,882,962	$0.05230	$307,679	$0.06230	$366,509	19.12%
18	Subtotal Summer	5,882,962		$307,679		$366,509	19.12%
	RH--Winter						
19	All kWhs	28,804,158	$0.05230	$1,506,457	$0.05475	$1,577,028	4.68%
20	Subtotal Winter	28,804,158		$1,506,457		$1,577,028	4.68%
21	Total Residential	115,100,926		$7,986,622		$8,557,477	7.15%

Source: CURB-46

Target $8,556,893

Rounding $584

EMPIRE DISTRICT ELECTRIC COMPANY
Summary of CURB Recommended Residential Base Revenue Increases

Line	Description	Present Revenue	Recommended Revenue	Recommended Increase Amount	Recommended Increase Percent
		(1)	(2)	(3)	(4)
	Residential Service				
1	General Service - RG	$5,078,829	$5,437,144	$358,315	7.06%
2	Water Heating - RGW	$816,107	$879,604	$63,497	7.78%
3	Total Electric - RH	$2,091,686	$2,240,729	$149,043	7.13%
4	Total Residential	$7,986,622	$8,557,477	$570,855	7.15%

Source: Sch. BK-2

EMPIRE DISTRICT ELECTRIC COMPANY

Summary of Present and Proposed Small General Service Base Rates

Line	Description	Present Rates (1)	Proposed Rates (2)	Proposed Increase Amount (3)	Proposed Increase Percent (4)
	Customer Charge				
1	Commercial Service - CB	$17.50	$19.20	$1.70	9.71%
2	Small Heating Service - SH	$17.50	$19.20	$1.70	9.71%
	Energy Charge				
	CB - Summer				
3	First 700 kWh	$0.09048	$0.09927	$0.00879	9.71%
4	All add'l kWh	$0.07510	$0.08239	$0.00729	9.71%
	CB - Winter				
5	First 700 kWh	$0.09048	$0.09927	$0.00879	9.71%
6	All add'l kWh	$0.07510	$0.08239	$0.00729	9.71%
	SH - Summer				
7	First 1000 kWh	$0.07419	$0.08140	$0.00721	9.72%
8	All add'l kWh	$0.06243	$0.06849	$0.00606	9.71%
	SH - Winter				
9	First 1000 kWh	$0.07419	$0.08140	$0.00721	9.72%
10	All add'l kWh	$0.06243	$0.06849	$0.00606	9.71%

EMPIRE DISTRICT ELECTRIC COMPANY Schedule BK-5

CURB Recommended SGS Rate Design and Proof of Revenue

Line	Description	Pro Forma Billing Determinants	Present Rates	Present Revenue	CURB Rates	CURB Revenue	Percentage Change in Revenues
		(1)	(2)	(3) = (1)*(2)	(4)	(5) = (1)*(4)	(6) = (5)/(3)
	Customer Charge						
1	Commercial Service - CB	13,889	$17.50	$243,058	$18.75	$260,419	7.14%
2	Small Heating Service - SH	1,380	$17.50	$24,150	$18.75	$25,875	7.14%
3	Subtotal	15,269		$267,208		$286,294	7.14%
	Energy Charge						
4	*CB - Summer*						
5	First 700 kWh	1,047,449	$0.09048	$94,773	$0.09074	$95,046	0.29%
6	All add'l kWh	3,274,685	$0.07510	$245,929	$0.08305	$271,963	10.59%
7	Subtotal Summer	4,322,134		$340,702		$367,009	7.72%
	CB - Winter						
8	First 700 kWh	4,609,157	$0.09048	$417,037	$0.09074	$418,235	0.29%
9	All add'l kWh	10,256,444	$0.07510	$770,259	$0.08305	$851,798	10.59%
10	Subtotal Winter	14,865,601		$1,187,296		$1,270,033	6.97%
	SH - Summer						
11	First 1000 kWh	125,077	$0.07419	$9,279	$0.07483	$9,360	0.86%
12	All add'l kWh	287,717	$0.06243	$17,962	$0.06895	$19,838	10.44%
13	Subtotal Summer	412,794		$27,241		$29,198	7.18%
	SH - Winter						
14	First 1000 kWh	855,965	$0.07419	$63,504	$0.07483	$64,052	0.86%
15	All add'l kWh	1,925,280	$0.06243	$120,195	$0.06895	$132,748	10.44%
16	Subtotal Winter	2,781,245		$183,699		$196,800	7.13%
17	Total SGS	22,381,774		$2,006,146		$2,149,334	7.14%

Source: CURB-46

Target $2,149,392

Rounding ($58)

EMPIRE DISTRICT ELECTRIC COMPANY
Summary of CURB Recommended SGS Revenue Increases

Line	Description	Present Revenue	Recommended Revenue	Recommended Increase	
				Amount	Percent
		(1)	(2)	(3)	(4)
	Small General Service				
1	Commercial Service - CB	$1,771,056	$1,897,461	$126,405	7.14%
2	Small Heating Service - SH	$235,090	$251,873	$16,783	7.14%
3	Total SGS - Secondary	$2,006,146	$2,149,334	$143,188	7.14%

Source: Sch. BK-5

CERTIFICATE OF SERVICE

11-EPDE-856-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 12th day of October, 2011, to the following:

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11-EPDE-856-RTS

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