

1 **DELMARVA POWER & LIGHT COMPANY**
2 **REBUTTAL TESTIMONY OF JOSEPH F. JANOCHA**
3 **BEFORE THE DELAWARE PUBLIC SERVICE COMMISSION**
4 **CONCERNING AN INCREASE IN GAS BASE RATES**
5 **DOCKET NO. 10-237**

6 **1. Q: Please state your name and position, and business address.**

7 A: My name is Joseph F. Janocha. I am Manager of Rate Economics for
8 Delmarva Power & Light (Delmarva, or the Company) and Atlantic City Electric
9 Company (ACE) in the Rates and Technical Services Section of Pepco Holdings
10 Inc. (PHI). My business address is P.O. Box 9239, Newark, DE 19714. I
11 submitted Direct Testimony on behalf of Delmarva in this case on July 2, 2010.
12 That testimony contains my educational background and professional
13 qualifications.

14 **2. Q: What is the purpose of your rebuttal testimony?**

15 A: The purpose of my testimony is:

- 16 • To incorporate the modified revenue requirement of \$10.163 million
17 included in the Rebuttal Testimony of Company Witness VonSteuben
18 into the proposed gas delivery rate design;
- 19 • To address a correction to the treatment of balancing fee revenue
20 identified during the discovery process that the Company committed to
21 correct at the time of rebuttal testimony;
- 22 • To address revenue allocation, rate design and tariff modification
23 issues raised in the Direct Testimony of Delaware Public Service
24 Commission Staff (DPSC Staff or Staff) Witnesses Howard Solganick

1 and Ralph Smith. I will address each of the issues raised by these
2 witnesses in separate sections of my testimony.

3 3. Q: Please explain the modifications to the rate design that result from
4 incorporating the revised revenue requirement of \$10.163 million proposed
5 by Company Witness VonSteuben.

6 A: Schedule JFJ R-1 provides the modified revenue allocation incorporating
7 the revised revenue requirement of \$10.163 million into Table 2. Additionally,
8 the modification to the AMI-related revenue requirement allocation has been
9 included in Table 3. The total revenue requirement allocation is provided in
10 Table 4. I have used the same principles delineated in my direct testimony of July
11 2, 2010 to allocate the revised revenue requirement among the gas delivery rate
12 service classifications.

13 The results from Schedule JFJ R-1 are carried through to Schedule JFJ R-
14 4, which provides the detailed rate design for each gas delivery service
15 classification. The bill impacts associated with the updated rate design are
16 provided in Schedule JFJ R-5. Since there was no change to the rate design
17 billing determinants, the revenue neutral rate design and associated bill impact
18 analyses, previously provided in Schedule JFJ-5 Updated for 12+0 through
19 Schedule JFJ-7 Updated for 12+0, are not changed and no corresponding Rebuttal
20 Schedules have been developed.

21 4. Q: Please describe the correcting adjustment that you are supporting that was
22 highlighted during the discovery process.

1 A: In response to Staff Data Request PSC-COS-21, it was identified that
2 revenues from balancing fees, applicable to medium and large volume
3 transportation customers, were inadvertently included in test period gas delivery
4 revenues. The balancing fee revenue, amounting to \$342,158 during the test
5 period, is actually included in the Gas Cost Recovery mechanism. The
6 adjustment is included Schedule WMV R-5 in the Rebuttal Testimony of
7 Company Witness VonSteuben.

8 5. Q: Please summarize the areas of Staff Witness Solganick's testimony that you
9 will address.

10 A: There are six items in Staff Witness Solganick's testimony that I will
11 address in my rebuttal.

- 12 1. The identification of differences between the values of Class Demand,
13 Customer and Commodity components as presented in Schedule JFJ-3
14 and Schedule EPT-2.
- 15 2. The allocation of the proposed revenue requirement to Service
16 Classification GL (Gas Lighting) as presented in Schedule JFJ-1.
- 17 3. The use of a separate allocation mechanism for Advanced Metering
18 Infrastructure (AMI)-related costs.
- 19 4. The apparent omission of the description of the treatment of customers
20 with default Delivery Demand Contribution (DDC) Factors in tariff
21 language filed by the Company in this proceeding.
- 22 5. The treatment of Late Payment, Restoration and Premise Collection
23 Charges in the development of billing determinants.

1 6. The modification of tariff language proposed by the Company
2 regarding terms and conditions related to the administration of
3 Contract Maximum Daily Quantity (Contract MDQ) and proposed
4 changes to the charge for Unauthorized Overruns.

5 **6. Q: Please address the Staff Witness Solganick's concern regarding the Class**
6 **Demand, Commodity and Customer components delineated in Schedule JFJ-**
7 **3.**

8 **A:** Staff Witness Solganick notes that the Class Demand, Commodity and
9 Customer components of Schedule JFJ-3 differ from those presented in Schedule
10 EPT-2¹. These components are used in the rate design process to develop the
11 proposed customer and demand-related rates for each service classification and
12 the results from both of the noted schedules should be identical. As Mr.
13 Solganick notes, the differences are minor and have negligible impact on the
14 ultimate rate design. However, I have opted to update my schedule, which is
15 provided as Schedule JFJ R-3 to reflect the CCOSS results provided in response
16 to Staff Data Request PSC-COS-1.

17 **7. Q: Please address the Staff Witness Solganick's concern regarding the revenue**
18 **allocation to Service Classification GL.**

19 **A:** Staff Witness Solganick concurs with the Company's approach to revenue
20 requirement allocation in the event the Commission approves a revenue increase.
21 However, he notes that the revenue allocation to Service Classification GL results
22 in a percentage increase in class revenue which exceeds 150% of the overall

¹ Direct Testimony of Howard Solganick, page 7, lines 24-28

1 proposed percentage revenue increase². As noted in my Direct Testimony, I
2 proposed using a class-specific percentage revenue increase limit of 150% of the
3 overall percentage increase. For Service Classification GL, this limit was
4 exceeded, due in large part to the extremely small revenue requirement of
5 approximately \$240.³ By similar reasoning, I have re-evaluated the revenue
6 allocation to Service Classification GL and have now limited the proposed
7 percentage increase to the limit of 150% of the overall percentage increase. The
8 revised allocation is reflected in Schedule JFJ R-1.

9 8. Q: **Please address the Staff Witness Solganick's concern regarding the use of a**
10 **separate allocation for AMI costs as proposed by the Company.**

11 A: Staff Witness Solganick notes that, due to the small amount of AMI costs
12 included in the Company's AMI Supplemental Testimony, the separate allocation
13 of AMI costs presented in Tables 3 and 4 of Schedule JFJ-1 are not necessary⁴.
14 While I agree that the level of costs under consideration may be considered small
15 (a revenue requirement of approximately \$151,000), it remains important to
16 separately allocate these costs. Since AMI costs have not been included in the per
17 books Class Cost of Service Study (CCOSS), the functional relationships for
18 customer, demand and commodity costs developed in the CCOSS are not
19 reflective of them. While very small, this introduces an avoidable level of
20 inaccuracy in the cost signals the CCOSS provides for the design of customer and
21 demand charges. By providing the separate allocation, AMI costs are
22 incorporated completely into the customer-related function and a more

² Direct Testimony of Howard Solganick, page 9, lines 18-20

³ AMI Supplemental Testimony of Joseph F. Janocha, Schedule JFJ-1 Update for AMI , page 1 of 1.

1 appropriate level of cost can be established for the design of the service
2 classification customer charges.

3 **9. Q: Please address the Staff Witness Solganick's concern regarding proposed**
4 **tariff language detailing treatment of customer premises with default DDC's.**

5 A: Staff Witness Solganick notes a perceived discrepancy between my
6 Supplemental Testimony Regarding the 12+0 Update and the language on
7 proposed Tariff Leaf 36b concerning the mechanism to update DDC's for
8 customer premises that initially are assigned a default DDC. Mr. Solganick
9 indicates that my testimony describes the mechanism, while Tariff Leaf 36b,
10 which should include comparable language, does not.⁵ However, as part of my
11 Supplemental Testimony Regarding the 12+0 Update, I included a new Schedule
12 JFJ-15. That schedule provides the proposed updated Tariff Sheet 36b, including
13 the language describing the mechanism for updating customer premises with
14 default DDC's.

15 **10. Q: Please address the Staff Witness Solganick's concern regarding the**
16 **completeness of billing determinants.**

17 A: Staff Witness Solganick indicates that the billing determinants filed by the
18 Company are not complete since they do not address revenues associated with
19 Late Payment, Restoration and Premise Collection Charges.⁶ These revenues are
20 included as Other Gas Revenues in the System Gas Earnings Workpaper
21 (Workpaper 17) provided in the Company's 12+0 Update. A further breakdown
22 of these revenues is provided in Workpaper 34. Since there is no change to the

⁴ Direct Testimony of Howard Solganick, page 10, lines 8-13

⁵ Direct Testimony of Howard Solganick, page 11, lines 19-21

1 rates being proposed, the revenues have not been included in the billing
2 determinant development as they are not required to validate the billing
3 determinants used to develop retail sales-related rates.

4 **11. Q: Please discuss Staff Witness Solganick's review of the tariff language changes**
5 **proposed by the Company.**

6 **A:** Mr. Solganick provided testimony related to the following proposed tariff
7 language changes:

- 8 • The addition of language to Contract MDQ language to Service
9 Classification GG;
- 10 • The process for notifying customers with regard to usage levels below
11 contract MDQ amounts;
- 12 • The proposed increase in the charge for Unauthorized Overruns.

13 **12. Q: Please discuss Staff Witness Solganick's concern regarding the inclusion of**
14 **Contract MDQ provisions within the terms and conditions of Service**
15 **Classification GG.**

16 Mr. Solganick recommends that the proposed addition of Contract MDQ
17 language to Leaf 41 a, providing the terms and conditions for Service
18 Classification GG, is not appropriate and could lead to customer confusion.⁷
19 Upon further evaluation of the proposed language, in an effort to avoid any
20 potential confusion, the Company is withdrawing the proposed change. The
21 intent was to provide MDQ related information to GVFT customers in order to
22 facilitate their understanding and dealings with external gas marketers and in

⁶ Direct Testimony of Howard Solganick, page 25, lines 19-25

⁷ Direct Testimony of Howard Solganick, page 24, lines 7-14

1 nominating their daily gas loads. The company was not proposing to use Contract
2 MDQ of the Design Day Contribution for Service Classifications GG or GVFT.

3 **13. Q: Please discuss Staff Witness Solganick's recommendation regarding the**
4 **notification process to notify customers whose actual MDQ falls below their**
5 **Contract MDQ level.**

6 In response to Staff Data Request PSC-WA-1, the Company described its
7 process for monitoring and notifying customers whose actual MDQ levels fall
8 below 70% of Contract MDQ levels. Mr. Solganick recommends that the process
9 be modified such that the Company provide written notice to the customer if the
10 measured MDQ levels fall to 80% of Contract MDQ for the twelve months
11 ending June 30th.⁸ The Company does not object to changing its internal trigger
12 level for initiating discussions related to MDQ changes with customers from 70%
13 to 80 %. However, affected customers have specific executed contracts which
14 have varying execution dates. Using the 12 month ending June 30th consumption
15 date for every customer could act to create customer confusion. In lieu of the
16 June 30th date, the Company proposes that the timing of notification remain the
17 responsibility of the Company and be done on a contract-specific basis to better
18 address customer-specific circumstances.

19 **14. Q: Please discuss Staff Witness Solganick's recommendation regarding the**
20 **modification to the charge for Unauthorized Overruns.**

21 Mr. Solganick reviewed the Company change in unauthorized Overrun
22 penalties. Mr. Solganick provided a summary of local Company penalties and
23 correctly states "the Company's present unauthorized overrun penalty is lower

1 that these other utilities.”⁹ The Company has proposed increasing its charge for
2 Unauthorized Overruns from \$20 per MCF to \$50 per MCF. Additionally, the
3 Company proposed that the charge for Unauthorized Overruns during curtailment
4 periods be increased from \$35 to \$60. Mr. Solganick recommends that the new
5 charge levels be set to \$30 and \$50 per MCF, respectively.¹⁰

6 **15. Q: Do you agree with Staff Witness Solganick's recommendation regarding the**
7 **modification to the charge for Unauthorized Overruns.**

8 No. Historically, the Company Penalty Charges have reflected the
9 Transco Tariff rate in section 18.4 and 18.5 (below; emphasis added) charges
10 which the Company would be subject to during such occurrences.

11 “18.4 Overrun Charges and Penalties

12 **Buyer shall pay Seller for all such unauthorized daily overrun**
13 **quantities taken on such day, an overrun charge equal to Seller's**
14 **Rate Schedule IT rate per dt calculated from Zone 3 to the zone in**
15 **which Buyer receives such quantities and such quantities shall be**
16 **treated as deliveries under Seller's applicable rate schedule(s) and as**
17 **an imbalance thereunder. If Buyer takes on any day unauthorized**
18 **overrun quantities in excess of the allowable daily dispatch**
19 **variations set forth in Section 18.2, Buyer shall pay in lieu of such**
20 **IT charge a penalty of \$2.50 per dt up to 50 dt, in excess of that**
21 **allowable variation for the particular day, and for any quantity of**
22 **additional unauthorized daily overrun taken on such day, a**
23 **penalty equal to the higher of (i) \$50 per dt or (ii) three times the**
24 **highest weekly Reference Spot Price for the current month (as set**
25 **forth in Section 37.1(a) of the General Terms and Conditions)**
26 **applicable to the zone(s) in which the unauthorized daily overrun**
27 **occurs.**

28 18.5 Unauthorized Overruns During Periods of Curtailment

29 **In addition to the provisions for unauthorized daily overruns and**
30 **penalties therefore under Sections 18.3 and 18.4 hereof, any**
31 **quantity taken by Buyer in excess of its Entitlement under Section**
32 **13 of the General Terms and Conditions by an amount of 100 dt or**
33 **two-tenths (0.2) percent of such Entitlement, whichever is greater,**

⁸ Direct Testimony of Howard Solganick, page 25, lines 7-15

⁹ Direct Testimony of Howard Solganick, page 23, lines 10-16

¹⁰ Direct Testimony of Howard Solganick, page 23, lines 18-25

1 shall constitute an unauthorized overrun, for which Buyer shall pay
2 Seller a penalty of \$10 per dt for any such unauthorized overrun.”¹¹
3
4

5 The Company’s intent in the subject filing is simply to update the penalty
6 charges based on most recent Transco tariffs. The Company proposed rates should
7 be approved. However, if the Commission elects to use Mr. Solganick’s values,
the 10 % threshold should be eliminated as well.

8 **16. Q: Please respond to Staff Witness Smith’s recommendation regarding the**
9 **treatment of the UFRC.**

10 A: Staff Witness Smith recommends that the Company’s proposed UFRC
11 Rider be removed from this case until administrative rules are adopted to
12 administer the UFRC.¹² This recommendation is not appropriate for a number of
13 reasons. First, Section 315 of Title 26 of the Delaware Code authorizes electric
14 and gas utilities to fix rate schedules establishing a UFRC. It does not prescribe
15 the establishment of administrative rules as a prerequisite for the establishment of
16 these rate schedules.

17 Second, Section 315 subjects the electric and gas utilities to the same
18 statutory requirements as water utilities seeking to implement a Distribution
19 System Improvement Charge (DSIC), as delineated in Section 314 of Title 26.
20 Section 314 includes a series of administrative requirements which would be
21 applicable to UFRC filings. It also includes the same language giving the
22 Commission the discretion to adopt rules to administer the DSIC. However,
23 while no administrative rules have been established, public water utilities have

¹¹ Note that the term “dt” in the quoted section of the Transco Tariff refers to “decatherm” and is a measure of gas heating value. For purposes of the subject charge, the level of the charge on a per therm or per MCF basis is essentially the same.

1 been and currently are implementing DSIC rates. It seems contradictory that the
2 UFRC, which is subject to the same statutory requirements as a DSIC, should be
3 deferred, while DSIC rates are currently in place.

4 Third, as noted in my Direct Testimony and in the testimony of Mr. Smith,
5 the Company is proposing a UFRC adjustment of 0% in this proceeding. The
6 major objective of including it in this filing is to establish the framework for the
7 UFRC to facilitate future filings, which the Company is already authorized to
8 make.

9 These objections notwithstanding, consistent with the position taken by
10 the Company in Commission Docket No. 09-414, the Company is amenable to the
11 prompt initiation of a proceeding by the Commission to enact any necessary
12 regulations and administrative rules.

13 **17. Q: Does this conclude your testimony?**

14 A: Yes, it does.

15

¹² Direct Testimony of Ralph Smith, page 70

Delmarva Power & Light Company - Delaware
Development of Proposed Gas Delivery Rates
Rate Class Allocation of Delivery Revenue Requirements
AMI Revenue Requirement Adjustment

	RG	RGH	GG	MVG	LVG
AMI Allocation Factors					
Present Meter Investment	15.045%	80.978%	3.977%	0.000%	0.000%
AMI Stranded Costs	8.492%	81.398%	9.393%	0.465%	0.254%
AMI Capital Expenditures	8.610%	82.838%	8.360%	0.089%	0.048%
Number of New AMI Indexes	8.621%	82.998%	8.336%	0.043%	0.005%
Non Transportation New Indexes					
Cost Category					
Stranded Cost Adjustment	\$0	\$-	\$-	\$-	\$-
AMI Plant Additions and Deferred AMI Costs	\$0	\$-	\$-	\$-	\$-
O&M Expense	\$606,671	\$51,516	\$493,805	\$56,984	\$2,825
AMI Savings	\$606,671	\$51,516	\$493,805	\$56,984	\$2,825
Adjusted Net Rate Base					
AMI Net Plant Additions	\$0	\$-	\$-	\$-	\$-
AMI Stranded Costs	\$0	\$-	\$-	\$-	\$-
AMI Deferred Costs	\$0	\$-	\$-	\$-	\$-
Required Rate of Return					
AMI O&M Expense	8.04%	8.04%	8.04%	8.04%	8.04%
AMI O&M Savings					
AMI Net Plant Additions					
AMI Stranded Costs					
AMI Deferred Costs					
Pro-Forma Operating Income					
AMI O&M Expense	\$0	\$-	\$-	\$-	\$-
AMI O&M Savings	\$0	\$-	\$-	\$-	\$-
AMI Net Plant Additions	\$0	\$-	\$-	\$-	\$-
AMI Stranded Costs	\$0	\$-	\$-	\$-	\$-
AMI Deferred Costs	\$0	\$-	\$-	\$-	\$-
Operating Income Deficiency					
AMI O&M Expense	\$0	\$-	\$-	\$-	\$-
AMI O&M Savings	\$0	\$-	\$-	\$-	\$-
AMI Net Plant Additions	\$0	\$-	\$-	\$-	\$-
AMI Stranded Costs	\$0	\$-	\$-	\$-	\$-
AMI Deferred Costs	\$0	\$-	\$-	\$-	\$-
Revenue Conversion Factor					
Revenue Requirement	1.69013	1.69013	1.69013	1.69013	1.69013
AMI O&M Expense	\$0	\$-	\$-	\$-	\$-
AMI O&M Savings	\$0	\$-	\$-	\$-	\$-
AMI Net Plant Additions	\$0	\$-	\$-	\$-	\$-
AMI Stranded Costs	\$0	\$-	\$-	\$-	\$-
AMI Deferred Costs	\$0	\$-	\$-	\$-	\$-

Delmarva Power & Light Company - Delaware
Development of Proposed Gas Delivery Rates
Rate Class Allocation of Delivery Revenue Requirements
AMI Revenue Requirement Adjustment

	Present Index Retirement	AMI Project CAP EX	Number of New Indexes	Stranded Cost	AMI Investment	Allocation Factors	AMI O&M	AMI Savings
Plant Data	\$ 4,752,885	\$ 12,625,126	123,924					
RESIDENTIAL	\$ 715,084	\$ 1,072,070	10,670	0.1505	0.0849	0.0861	0.0862	
RESIDENTIAL HEAT	<u>\$ 3,848,776</u>	<u>\$ 10,276,310</u>	<u>102,724</u>	<u>0.8098</u>	<u>0.8140</u>	<u>0.8289</u>	<u>0.8300</u>	
ALL RESIDENTIAL	\$ 4,563,860	\$ 11,348,380	113,394					
GG	\$ 189,025	\$ 1,163,393	10,318	0.0398	0.0921	0.0833	0.0834	
GWFT	\$ -	\$ 22,469	42	-	0.0018	0.0003		
MVG	\$ -	\$ 28,293	53	-	0.0022	0.0004	0.0004	
MVFT	\$ -	\$ 26,213	49	-	0.0021	0.0004	0.0004	
LVG	\$ -	\$ 3,210	6	-	0.0003	0.0000	0.0000	
LVFT	\$ -	\$ 23,538	44	-	0.0019	0.0004	0.0004	
MVT	\$ -	\$ 4,280	8	-	0.0003	0.0001	0.0001	
LVT	\$ -	\$ 5,350	10	-	0.0004	0.0001	0.0001	
				1.0000	1.0000	1.0000	1.0000	1.0000

Delmarva Power & Light Company - Delaware
Development of Proposed Gas Delivery Rates
Development of Revenue Classification
Per Test Year Cost of Service Study

Schedule JFJ R-2
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	TOTAL COMPANY (1)	RESIDENTIAL (2)	RESIDENTIAL HEATING (3)	RESIDENTIAL + HEATING (4)	GENERAL SERVICE (5)	MEDIUM VOLUME GENERAL (6)	LARGE VOLUME GENERAL (7)	LARGE LIGHTING (8)
1 Summary Analysis of COSS Results								
2 Demand Rev Req (\$)	\$ 33,391,562	\$ 439,764	\$ 17,732,874	\$ 18,172,638	\$ 9,946,686	\$ 2,032,902	\$ 3,239,135	\$ 201
3 Commodity Rev Req (\$)	\$ 7,181,443	\$ 128,251	\$ 4,412,080	\$ 4,540,332	\$ 2,363,141	\$ 201,106	\$ 76,776	\$ 89
4 Customer Rev Req (\$)	\$ 30,758,500	\$ 2,420,936	\$ 22,556,620	\$ 24,977,557	\$ 5,018,626	\$ 536,324	\$ 255,352	\$ 641
5 Total Base Rev Req (\$)	\$ 71,361,506	\$ 2,988,952	\$ 44,701,575	\$ 47,690,527	\$ 17,328,453	\$ 2,770,332	\$ 3,571,262	\$ 932
6 Incremental AMI Revenue Requirement	\$ 153,152	\$ 13,005	\$ 124,660	\$ 137,665	\$ 14,385	\$ 713	\$ 389	\$ -
Total	\$ 71,514,658	\$ 3,001,957	\$ 44,826,234	\$ 47,828,191	\$ 17,342,839	\$ 2,771,045	\$ 3,571,652	\$ 932
8								
9 Demand Rev Req (%)	14.65%	39.56%	38.00%	57.35%	73.36%	90.69%	21.59%	
10 Commodity Rev Req (%)	4.27%	9.84%	9.49%	13.63%	7.26%	2.15%	9.58%	
11 Customer Rev Req (%)	81.08%	50.60%	52.51%	29.02%	19.38%	7.16%	68.83%	

Delmarva Power & Light Company - Delaware
Development of Proposed Gas Delivery Rates
Development of Aggregate Design Day Contribution Factor

Schedule JFJ R-3
Page 1 of 1

		Residential	GG
1	Sales Jan - Feb 2010 (MCF)	3,231,701	<u>1,636,481</u>
2	Customers Jan-Feb 2010	113,438	9,471
3	August 2009 Monthly Sales (MCF)	132,378	111,602
4	August 2009 Average Daily Usage (MCF) = Line 3/31	4,270	3,600
5	Customers - August 2009	112,441	9,341
6	Non-Heating Usage (MCF) = Line 4 / Line 5 x (31 + 28) x Line 2	254,163	215,345
7	Heating Usage (MCF) = Line 1 - Line 6	2,977,538	1,421,136
8	Heating Degree Days: Jan - Feb 2010	2,019	2,019
9	Heating Usage per Degree Day per Customer (=Line 7 / Line 8 / Line 2)	0.01300	0.07433
10	Design Day Degrees	65	65
11	Peak Day Heating Usage = Line 2 x Line 9 x Line 10	95,871	45,758
12	Peak Day Non Heating Usage = Line 6 / (31+28)	4,308	<u>3,650</u>
13	Design Day Contribution (MCF) = Line 11 + Line 12	100,179	49,408
14	Design Day Contribution per Customer (MCF) =Line 13 / Line 2	0.88312	5.21703

Schedule JFJ R-4
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**Delmarva Power & Light Company - Delaware
Development of Proposed Gas Delivery Rates
Residential Gas Service Rate Design
Using Twelve Months Ending December 2009 Actual**

Revenue Required	Existing Rate Design				Proposed Rate Design			
	Rate Element	Billing Determinants	Current Rate	Annualized Revenue	Billing Determinants	Revenue Neutral Rate Targets	Annualized Recovery Revenue at Revenue Neutral Rates	Proposed Rate
Customer Charge (\$ per month)	1,356,454	\$ 9.56	\$ 12,967,700	1,356,454	\$ 13.00	\$ 17,633,902	0.4101	\$ 15.36
First 50 CCF Commodity Rate	39,492,299	\$ 0.42101	\$ 16,626,653					
Winter Over 50 CCF Commodity Rate	39,683,762	\$ 0.33784	\$ 13,406,762					
Design Day Contribution Rate (\$ per CCF of DDC per Year)				12,021,483	\$ 2.11016	\$ 25,367,213	0.5899	\$ 2.49295
Total							\$ 43,001,115	\$ 50,801,743

Delmarva Power & Light Company - Delaware
Development of Proposed Gas Delivery Rates
General Gas Service Rate Design
Using Twelve Months Ending December 2009 Actual Data

Schedule JFJ R-4
Page 2 of 5

Delmarva Power & Light Company - Delaware
Development of Proposed Gas Delivery Rates
Medium Volume Gas (MVG) Service Rate Design
Medium Volume Firm Transportation Service
Using Twelve Months Ending December 2009 Actual Data

Schedule JFJ R-4
Page 3 of 5

	Rate Element	Billing Determinants	Current Rate	Annualized Revenue	Proposed Rate	Proposed Revenue
MVG	Customer Charge (\$ per month)	339 \$ 419.27	\$ 142,133	\$ 646.04	\$ 219,009	
	Demand MDQ MCF Rate	54,480 \$ 13.39	\$ 729,487	\$ 15.77	\$ 859,383	
	Commodity MCF Rate	383,496 \$ 0.42979	\$ <u>164,823</u> <u>\$ 1,036,442</u>	\$ 0.14434	\$ <u>55,356</u> <u>\$ 1,133,747</u>	
MVFT	Customer Charge (\$ per month)	390 \$ 694.27	\$ 270,765	\$ 921.04	\$ 359,207	
	Demand MDQ MCF Rate	84,276 \$ 13.39	\$ 1,128,456	\$ 15.77	\$ 1,329,393	
	Commodity MCF Rate	1,116,561 \$ 0.429790	\$ <u>479,887</u> <u>\$ 1,879,108</u>	\$ 0.14434	\$ <u>161,170</u> <u>\$ 1,849,770</u>	
	Total		\$ <u>2,915,550</u>		\$ <u>2,983,517</u>	

Delmarva Power & Light Company - Delaware
Development of Proposed Gas Delivery Rates
Large Volume Gas (LVG) Service Rate Design
Large Volume Firm Transportation Service
Using Twelve Months Ending December 2009 Actual Data

Schedule JFJ R 4
Page 4 of 5

LVG	Rate Element	Billing Determinants	Current Rate	Annualized Revenue	Proposed Rate	Proposed Revenue
	Customer Charge (\$ per month)	24	\$ 634.58	\$ 15,230	\$ 1,263.42	\$ 30,322
	Demand MDQ MCF Rate	6,972	\$ 8.24721	\$ 57,500	\$ 11.50	\$ 80,155
	Commodity MCF Rate	165,787	\$ 0.103390	\$ <u>17,141</u> <u>89,870</u>	\$ 0.01781	\$ <u>2,953</u> <u>113,429</u>
<hr/>						
LVFT	Customer Charge (\$ per month)	144	\$ 909.58	\$ 130,980	\$ 1,538.42	\$ 221,533
	Demand MDQ MCF Rate	270,492	\$ 8.24721	\$ 2,230,804	\$ 11.50	\$ 3,109,755
	Commodity MCF Rate	4,079,601	\$ 0.103390	\$ <u>421,790</u> <u>2,783,574</u>	\$ 0.01781	\$ <u>72,656</u> <u>3,403,944</u>
<hr/>						
Total				\$ 2,873,444		\$ 3,517,374

Delmarva Power & Light Company - Delaware
Development of Proposed Gas Delivery Rates
Gas Lighting Sales Service (GL) Rate Design
Using Twelve Months Ending December 2009 Actual Data

Schedule JFJ R-4
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Rate Element	Billing Determinants	Current Rate	Annualized Revenue	Proposed Rate	Proposed Revenue
Total	\$ \$	869 869			
Customer					
				\$ <u>869</u>	\$ <u>869</u>
Customer Charge (\$ per month)		120 \$ 5.92	\$ 710	\$ 7.24	\$ 869
Total			\$ <u>710</u>		

Delmarva Power Light Company - Delaware Gas
General Gas Service Classification
Bill Impact Analysis

MONTHLY WINTER SALES (CCF)	Non-Winter Usage (as a Percentage of Average Summer Usage)									
	0%	10%	20%	30%	40%	50%	60%	70%	80%	90%
0	-	-	-	-	-	-	-	-	-	-
25	-	2.50	5.00	7.50	10.00	12.50	15.00	17.50	20.00	22.50
50	-	5.00	10.00	15.00	20.00	25.00	30.00	35.00	40.00	45.00
75	-	7.50	15.00	22.50	30.00	37.50	45.00	52.50	60.00	67.50
100	-	10.00	20.00	30.00	40.00	50.00	60.00	70.00	80.00	90.00
200	-	20.00	40.00	60.00	80.00	100.00	120.00	140.00	160.00	180.00
300	-	30.00	60.00	90.00	120.00	150.00	180.00	210.00	240.00	270.00
400	-	40.00	80.00	120.00	160.00	200.00	240.00	280.00	320.00	360.00
500	-	50.00	100.00	150.00	200.00	250.00	300.00	350.00	400.00	450.00
1000	-	100.00	200.00	300.00	400.00	500.00	600.00	700.00	800.00	900.00
1500	-	150.00	300.00	450.00	600.00	750.00	900.00	1,050.00	1,200.00	1,350.00
2000	-	200.00	400.00	600.00	800.00	1,000.00	1,200.00	1,400.00	1,600.00	1,800.00
2500	-	250.00	500.00	750.00	1,000.00	1,250.00	1,500.00	1,750.00	2,000.00	2,250.00
3000	-	300.00	600.00	900.00	1,200.00	1,500.00	1,800.00	2,100.00	2,400.00	2,700.00
3500	-	350.00	700.00	1,050.00	1,400.00	1,750.00	2,100.00	2,450.00	2,800.00	3,150.00
4000	-	400.00	800.00	1,200.00	1,600.00	2,000.00	2,400.00	2,800.00	3,200.00	3,600.00
4500	-	450.00	900.00	1,350.00	1,800.00	2,250.00	2,700.00	3,150.00	3,600.00	4,050.00
5000	-	500.00	1,000.00	1,500.00	2,000.00	2,500.00	3,000.00	3,500.00	4,000.00	4,500.00
6000	-	600.00	1,200.00	1,800.00	2,400.00	3,000.00	3,600.00	4,200.00	4,800.00	5,400.00
7000	-	700.00	1,400.00	2,100.00	2,800.00	3,500.00	4,200.00	4,900.00	5,600.00	6,300.00
8000	-	800.00	1,600.00	2,400.00	3,200.00	4,000.00	4,800.00	5,600.00	6,400.00	7,200.00
9000	-	900.00	1,800.00	2,700.00	3,600.00	4,500.00	5,400.00	6,300.00	7,200.00	8,100.00
10000	-	1,000.00	2,000.00	3,000.00	4,000.00	5,000.00	6,000.00	7,000.00	8,000.00	9,000.00
12000	-	1,200.00	2,400.00	3,600.00	4,800.00	6,000.00	7,200.00	8,400.00	9,600.00	10,800.00
14000	-	1,400.00	2,800.00	4,200.00	5,600.00	7,000.00	8,400.00	9,800.00	11,200.00	12,600.00
16000	-	1,600.00	3,200.00	4,800.00	6,400.00	8,000.00	9,600.00	11,200.00	12,800.00	14,400.00
18000	-	1,800.00	3,600.00	5,400.00	7,200.00	9,000.00	10,800.00	12,600.00	14,400.00	16,200.00
20000	-	2,000.00	4,000.00	6,000.00	8,000.00	10,000.00	12,000.00	14,000.00	16,000.00	18,000.00

MONTHLY WINTER SALES (CCF)	Non-Winter Usage (as a percentage of Average Winter Usage)	DDC (CCF)				
		>>	30%	20%	10%	0%
0	-	-	-	-	-	-
25	1.74520	1.65977	1.57434	1.48891	1.40348	1.31805
50	3.49040	3.31954	3.14868	2.97782	2.80696	2.63610
75	5.23560	4.97931	4.72032	4.46673	4.21044	3.95416
100	6.98080	6.63908	6.29736	5.95564	5.61392	5.27220
200	13.96161	13.27816	12.59472	11.91128	11.22783	10.54439
300	20.94241	19.91724	18.89208	17.86691	16.84175	15.81659
400	27.92321	26.55632	25.18944	23.82255	22.45567	21.08978
500	34.90401	33.19541	31.48980	29.77819	28.06958	26.35098
1000	69.80863	66.39081	62.97360	59.55638	56.13917	52.72195
1500	104.71204	99.55622	94.46040	89.33457	84.20875	79.05293
2000	139.61666	132.78162	125.94719	119.11276	112.27833	105.44390
2500	174.52007	165.97703	157.43399	148.89095	140.34791	131.80488
3000	209.42408	199.17244	188.92079	178.68914	168.41750	158.16585
3500	244.32810	232.36784	220.40759	208.44733	196.48708	184.52683
4000	279.23211	265.56325	251.89439	238.22552	224.55666	210.88780
4500	314.13613	298.75866	283.38119	268.00372	252.62625	237.24878
5000	349.04014	331.95406	314.86798	297.78191	280.69583	263.60975
6000	418.84817	398.34487	377.84158	357.33829	336.83499	316.33170
7000	485.65620	464.75569	440.81518	416.88467	392.97416	369.05365
8000	558.46422	531.16650	503.78877	476.45105	449.11333	421.77560
9000	628.27225	597.57131	566.76237	536.00743	505.25249	474.49755
10000	698.08028	663.90812	629.73997	595.56381	561.39166	527.21950
12000	837.69634	796.68975	755.68316	714.67657	673.66999	632.66340
14000	977.31239	929.47137	881.63036	833.78934	785.94832	738.10730
16000	1,116,92845	1,062,25300	1,007,57555	952,90210	888,22685	843,55120
18000	1,256,54450	1,195,03462	1,133,52474	1,072,01486	1,010,50498	948,99510
20000	1,396,16056	1,327,81625	1,259,47194	1,191,12762	1,122,78331	1,054,49900
						1,054,49900
						936,09469
						917,75038
						917,08176
						781,08176
						712,71745

