



Office of the Ohio Consumers' Counsel

**Before
The Ohio House
Government Oversight Committee**

**Testimony Opposing Senate Bill 9
(As to PUCO Regulations Needed for Consumer Protection)**

**Presented by Bruce Weston
Ohio Consumers' Counsel**

**On Behalf of the
Office of the Ohio Consumers' Counsel**

December 9, 2021

Hello Chair Wilkin, Vice-Chair White, Ranking Member Brown, and members of the Committee. I hope you and your colleagues are well. As agency director, I am testifying on behalf of the Office of the Ohio Consumers' Counsel for the millions of Ohio residential utility consumers who would be affected by Senate Bill 9. Thank you for this opportunity to testify.

I am providing limited opponent testimony on the Bill, with regard to the Bill's potential for preventing or reducing the regulations needed for protection of utility consumers. Accordingly, for consumer protection, please exempt the PUCO's regulations from Senate Bill 9. In this regard, I understand that yesterday there was a precedent of the Committee adopting Amendment AM_134_2285 to exempt the Ohio Casino Control Commission from the Bill.

Utilities have a bargain with the government to allow them to operate as monopolies in exchange for government regulation to protect consumers from their monopoly power. Senate Bill 9's potential for preventing or reducing regulations of utility monopolies can break that bargain against the public interest.

Instead of fewer regulations, the public can need more PUCO regulations as utility service issues change or develop over time. Also, new regulations are needed for reforms of PUCO processes that favor utilities. Likewise, many existing PUCO regulations are needed for consumer protection and should not be eliminated under the Bill as a trade for new regulations.

The COVID pandemic has highlighted the essential nature of utility services and the need for consumer protection regulations. Many Ohioans have struggled during this time with a lack of money for utilities, health, food, and housing. There are PUCO regulations, for example, to protect Ohioans from unreasonable disconnections of their utility service. Disconnection of utility service can even be life threatening. There was a tragedy in 2011 when two consumers in Cincinnati died from hypothermia after their electric service was disconnected during cold weather.

The PUCO also conducts limited regulation of some non-monopoly providers of services that are vested with the public interest. An example is the PUCO's oversight of energy marketers. In allowing for electricity marketing, the legislature required the PUCO, in R.C. 4928.10, to adopt rules including "a prohibition against unfair, deceptive, and unconscionable acts and practices in the marketing, solicitation, and sale of such a competitive retail electric service and in the administration of any contract for service, and also shall include additional consumer protections concerning all of the following..." R.C. 4929.22 contains a similar requirement for the PUCO to adopt rules to regulate natural gas marketers.

But just recently (September 8, 2021) the PUCO wrote that it could not propose various additional consumer protection rules regarding energy marketers. The PUCO explained that "[i]n light of R.C. 121.95, only limited amendments are being proposed for this set of five-year rule reviews." The PUCO also noted the constraint in R.C. 121.95(F) that state agencies (including the PUCO) "may not adopt a new regulatory restriction unless it simultaneously removes two or more existing regulatory restrictions." (See Attached PUCO Entry at paragraphs 6 and 7, without Attachments.)

This result where R.C. 121.95 is preventing the PUCO from adopting consumer protection regulations is bad for Ohioans. More regulations are needed to protect consumers. Thus, PUCO regulations should be exempted from Senate Bill 9 and from R.C. 121.95. Alternatively, with regard to energy marketing, the legislature should enact changes to protect Ohio consumers by banning: door-to-door energy sales; automatic renewal of energy contracts; and "teaser" rates (where energy is marketed using a low initial price that soon is replaced with a higher price). Attached is recent "shadow-billing" information from Columbia Gas showing that its consumers have paid energy marketers about two billion dollars more than what Columbia charged for natural gas since 1997.

Additionally, the FirstEnergy and House Bill 6 scandals have shown a need for more regulations. The PUCO should have more (not less) authority, jurisdiction and regulations to investigate utilities, their management and the complicated arrangements with utility affiliates. And there should be more (not less) regulations for safeguards, remedies and penalties involving any misconduct by utilities and the PUCO.

Having said the above, there are some utility regulations that should be eliminated, like those (including the statute) for allowing so-called electric security plans. Electric security plans, especially as implemented by the PUCO, can hinder the competitive market that we support for power plants and can be used to allow utility cherry-picking of charges (so-called riders) that drive up consumers' electric bills. Those regulations have burdened consumers with subsidies, such as to AEP, Duke and AES for uneconomic and polluting OVEC coal plants (before the coal plant subsidies of House Bill 6).

In conclusion, for consumer protection PUCO regulations should be exempted from Senate Bill 9 and current R.C. 121.95. In this regard, I understand that yesterday there was a precedent of the Committee adopting Amendment AM_134_2285 to exempt the Ohio Casino Control Commission from the Bill. Thank you for your consideration.

THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE COMMISSION'S
REVIEW OF OHIO ADM.CODE CHAPTERS
4901:1-21, 4901:1-23, 4901:1-24, 4901:1-
27, 4901:1-28, 4901:1-29, 4901:1-30,
4901:1-31, 4901:1-32, 4901:1-33, AND
4901:1-34 REGARDING RULES
GOVERNING COMPETITIVE RETAIL
ELECTRIC SERVICE AND COMPETITIVE
RETAIL NATURAL GAS SERVICE.

CASE NOS. 17-1843-EL-ORD
17-1844-EL-ORD
17-1862-EL-ORD
17-1845-GA-ORD
17-1846-GA-ORD
17-1847-GA-ORD
17-1848-GA-ORD
17-1849-GA-ORD
17-1850-GA-ORD
17-1851-GA-ORD
17-1852-GA-ORD

ENTRY

Entered in the Journal on September 8, 2021

I. SUMMARY

{¶ 1} The Commission directs that all interested persons or entities wishing to file comments or reply comments with the Commission regarding the competitive retail electric service and competitive retail natural gas service rules in Ohio Adm.Code Chapters 4901:1-21, 4901:1-23, 4901:1-24, 4901:1-27, 4901:1-28, 4901:1-29, 4901:1-30, 4901:1-31, 4901:1-32, 4901:1-33, and 4901:1-34 do so no later than October 8, 2021, and October 22, 2021, respectively.

II. DISCUSSION

{¶ 2} R.C. 111.15(B) and R.C. 106.03(A) require all state agencies to conduct a review, every five years, of their rules and to determine whether to continue their rules without change, amend their rules, or rescind their rules. At this time, the Commission is reviewing the competitive retail electric service and competitive retail natural gas service (CRNGS) rules in Ohio Adm.Code Chapters 4901:1-21, 4901:1-23, 4901:1-24, 4901:1-27, 4901:1-28, 4901:1-29, 4901:1-30, 4901:1-31, 4901:1-32, 4901:1-33, and 4901:1-34.

{¶ 3} R.C. 106.03(A) requires that the Commission determine whether the rules:

- (a) Should be continued without amendment, be amended, or be rescinded, taking into consideration the purpose, scope, and intent of the statute under which the rules were adopted;
- (b) Need amendment or rescission to give more flexibility at the local level;
- (c) Need amendment or rescission to eliminate unnecessary paperwork;
- (d) Incorporate a text or other material by reference and, if so, whether the citation accompanying the incorporation by reference would reasonably enable the Joint Committee on Agency Rule Review or a reasonable person to whom the rules apply to find and inspect the incorporated text or material readily and without charge and, if the rule has been exempted in whole or in part from R.C. 121.71 to 121.74 because the incorporated text or material has one or more characteristics described in R.C. 121.75(B), whether the incorporated text or material actually has any of those characteristics;
- (e) Duplicate, overlap with, or conflict with other rules;
- (f) Have an adverse impact on businesses, as determined under R.C. 107.52;
- (g) Contain words or phrases having meanings that in contemporary usage are understood as being derogatory or offensive; and
- (h) Require liability insurance, a bond, or any other financial responsibility instrument as a condition of licensure.

{¶ 4} Additionally, in accordance with R.C. 121.82, in the course of developing draft rules, the Commission must evaluate the rules against the business impact analysis (BIA). If there will be an adverse impact on businesses, as defined in R.C. 107.52, the agency is to incorporate features into the draft rules to eliminate or adequately reduce any adverse impact. Furthermore, the Commission is required, pursuant to R.C. 121.82, to provide the Common Sense Initiative (CSI) office the draft rules and the BIA.

{¶ 5} On October 3, 2017, the Commission held a workshop in these proceedings to enable interested stakeholders to propose revisions to the rules in Ohio Adm.Code Chapters 4901:1-10,¹ 4901:1-21, 4901:1-23, 4901:1-24, 4901:1-27, 4901:1-28, 4901:1-29, 4901:1-30, 4901:1-31, 4901:1-32, 4901:1-33, and 4901:1-34 for the Commission's consideration. Representatives of different interested stakeholders attended the workshop, with comments offered by several of the stakeholders.

{¶ 6} According to R.C. 121.95, a state agency, including the Commission, cannot adopt a new regulatory restriction unless it simultaneously removes two or more existing regulatory restrictions.

{¶ 7} In light of R.C. 121.95, only limited amendments are being proposed for this set of five-year rule reviews.

{¶ 8} Staff has evaluated the rules contained in these chapters. Following its review, Staff recommends the following amendments to the rules:

- (a) The amendments found within Ohio Adm.Code Chapter 4901:1-24 and portions of the amendments found within Ohio Adm.Code Chapter 4901:1-27 codify the waivers implemented in the June 3, 2020 Commission Entry issued in Case No. 20-1077-GE-WVR.

¹ Subsequently, in Case No. 17-1842-EL-ORD, the Commission proceeded separately with the five-year review of Ohio Adm.Code Chapter 4901:1-10. The case caption for these proceedings has been modified accordingly.

(b) The amendments found within Ohio Adm.Code Chapter 4901:1-29 and the remaining portions of amendments found within Ohio Adm.Code Chapter 4901:1-27 reconcile the rule amendments made to Ohio Adm.Code Chapter 4901:1-13 in the most recent five-year rule review cases, Case Nos. 13-2225-GA-ORD and 19-1429-GA-ORD. These cases consolidated provisions relating to natural gas companies by moving them from the CRNGS rule chapters to the minimum gas service standards chapter, Ohio Adm.Code Chapter 4901:1-13. Accordingly, the proposed amendments remove these certain provisions from the CRNGS rule chapters to avoid duplication.

{¶ 9} Attached to this Entry are the proposed amendments to Ohio Adm.Code Chapters 4901:1-21, 4901:1-23, 4901:1-24, 4901:1-27, 4901:1-28, 4901:1-29, 4901:1-30, 4901:1-31, 4901:1-32, 4901:1-33, and 4901:1-34 (Attachments A, C, E, G, I, K, M, O, Q, S, and U) and the BIAs (Attachments B, D, F, H, J, L, N, P, R, T, and V), which are also posted on the Commission's Docketing Information System (DIS) website at <http://dis.puc.state.oh.us>. To minimize the expense of these proceedings, the Commission will serve a paper copy of this Entry only. All interested persons are directed either to input one of the case numbers listed in the case caption above into the Case Lookup box in DIS to view the corresponding documents, or to contact the Commission's Docketing Division to request a paper copy.

{¶ 10} The Commission requests comments from interested persons to assist in the review required by R.C. 111.15 and R.C. 106.03. Comments should be filed, via electronic filing or in hard copy, by October 8, 2021. Reply comments should be filed by October 22, 2021. All interested persons are directed to file their comments in the case dockets for 17-1843-EL-ORD, et al.

III. ORDER

{¶ 11} It is, therefore,

{¶ 12} ORDERED, That all interested persons or entities wishing to file comments or reply comments with the Commission regarding the proposed rules do so no later than October 8, 2021, and October 22, 2021, respectively, and file these comments in the case dockets for 17-1843-EL-ORD, et al. It is, further,

{¶ 13} ORDERED, That a copy of this Entry, with the rules and the BIAs, be submitted to CSI, in accordance with R.C. 121.82. It is, further,

{¶ 14} ORDERED, That a copy of this Entry be sent to the electric-energy and gas-pipeline list-serves. It is, further,

{¶ 15} ORDERED, That a copy of this Entry be served upon all investor-owned electric utilities in the state of Ohio, all certified competitive retail electric service providers in the state of Ohio, all regulated gas and natural gas companies, all certified retail natural gas suppliers, the Ohio Consumers' Counsel, the Ohio Gas Association, the Ohio Petroleum Council, the Ohio Oil and Gas Association, and all other interested persons of record.

COMMISSIONERS:

Approving:

Jenifer French, Chair
M. Beth Trombold
Lawrence K. Friedeman
Dennis P. Deters

MJS/mef

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Apr-97	\$425,351	\$43,275	\$0			\$468,626	\$335,000	\$803,626	\$335,000	\$803,626	\$468,626
May-97	\$342,846	\$39,215	\$0			\$382,061	\$305,627	\$687,688	\$640,627	\$1,491,314	\$850,687
Jun-97	\$195,327	\$28,158	\$0			\$223,485	\$59,826	\$283,311	\$700,453	\$1,774,625	\$1,074,172
Jul-97	\$87,295	\$19,242	\$0			\$106,537	\$57,698	\$164,235	\$758,151	\$1,938,860	\$1,180,709
Aug-97	\$76,251	\$11,529	\$0			\$87,780	\$49,657	\$137,437	\$807,808	\$2,076,297	\$1,268,489
Sep-97	\$83,182	\$12,863	\$0			\$96,045	\$47,863	\$143,908	\$855,671	\$2,220,205	\$1,364,534
Oct-97	\$128,462	\$13,284	\$0			\$141,746	\$68,492	\$210,238	\$924,163	\$2,430,443	\$1,506,280
Nov-97	\$395,185	\$39,517	\$0			\$434,702	\$238,592	\$673,294	\$1,162,755	\$3,103,737	\$1,940,982
Dec-97	\$579,381	\$123,876	\$0			\$703,257	\$351,824	\$1,055,081	\$1,514,579	\$4,158,818	\$2,644,239
Jan-98	\$824,159	\$263,876	\$0			\$1,088,035	\$488,246	\$1,576,281	\$2,002,825	\$5,735,099	\$3,732,274
Feb-98	\$682,159	\$154,769	\$0			\$836,928	\$539,537	\$1,376,465	\$2,542,362	\$7,111,564	\$4,569,202
Mar-98	\$595,217	\$114,732	\$0			\$709,949	\$516,279	\$1,226,228	\$3,058,641	\$8,337,792	\$5,279,151
Apr-98	\$462,581	\$80,935	\$0			\$543,516	\$405,279	\$948,795	\$3,463,920	\$9,286,587	\$5,822,667
May-98	\$374,279	\$43,982	\$0			\$418,261	\$269,582	\$687,843	\$3,733,502	\$9,974,430	\$6,240,928
Jun-98	\$197,956	\$20,984	\$0			\$218,940	\$125,985	\$344,925	\$3,859,487	\$10,319,355	\$6,459,868
Jul-98	\$93,579	\$14,839	\$0			\$108,418	\$89,153	\$197,571	\$3,948,640	\$10,516,926	\$6,568,286
Aug-98	\$86,279	\$9,524	\$0			\$95,803	\$58,426	\$154,229	\$4,007,066	\$10,671,155	\$6,664,089
Sep-98	\$83,279	\$16,842	\$0			\$100,121	\$67,518	\$167,639	\$4,074,584	\$10,838,794	\$6,764,210
Oct-98	\$154,283	\$123,849	\$0			\$278,132	\$84,159	\$362,291	\$4,158,743	\$11,201,085	\$7,042,342
Nov-98	\$786,924	\$459,627	\$0			\$1,246,551	\$241,897	\$1,488,448	\$4,400,640	\$12,689,533	\$8,288,893
Dec-98	\$1,248,953	\$815,476	\$0			\$2,064,429	\$386,295	\$2,450,724	\$4,786,935	\$15,140,257	\$10,353,322
Jan-99	\$2,841,953	\$1,524,869	\$0			\$4,366,822	\$595,015	\$4,961,837	\$5,381,950	\$20,102,094	\$14,720,144
Feb-99	\$2,692,746	\$1,362,745	\$0			\$4,055,491	\$428,931	\$4,484,422	\$5,810,881	\$24,586,516	\$18,775,635
Mar-99	\$1,792,549	\$1,198,257	\$0			\$2,990,806	\$491,930	\$3,482,736	\$6,302,810	\$28,069,251	\$21,766,441
Apr-99	\$1,295,736	\$992,843	\$0			\$2,288,579	\$420,001	\$2,708,580	\$6,722,811	\$30,777,831	\$24,055,020
May-99	\$35,928	\$305,672	\$0			\$341,600	\$171,237	\$512,837	\$6,894,048	\$31,290,668	\$24,396,620
Jun-99	-\$6,482	\$274,958	\$0			\$268,476	\$94,756	\$363,232	\$6,988,804	\$31,653,900	\$24,665,096
Jul-99	-\$5,169	\$128,965	\$0			\$123,796	\$67,171	\$190,967	\$7,055,974	\$31,844,866	\$24,788,892
Aug-99	\$323,859	\$216,852	\$0			\$540,711	\$62,777	\$603,488	\$7,118,752	\$32,448,355	\$25,329,603
Sep-99	\$301,528	\$287,495	\$0			\$589,023	\$55,638	\$644,661	\$7,174,390	\$33,093,016	\$25,918,626
Oct-99	\$547,523	\$437,053	\$0			\$984,576	\$113,827	\$1,098,403	\$7,288,217	\$34,191,419	\$26,903,202
Nov-99	\$2,924,475	\$1,350,835	\$0			\$4,275,310	\$269,173	\$4,544,483	\$7,557,390	\$38,735,902	\$31,178,512
Dec-99	\$4,287,950	\$2,184,202	\$0			\$6,472,152	\$438,838	\$6,910,990	\$7,996,228	\$45,646,892	\$37,650,664
Jan-00	\$5,411,314	\$2,833,574	\$24,986			\$8,269,874	\$696,339	\$8,966,213	\$8,692,566	\$54,613,105	\$45,920,538
Feb-00	\$2,147,364	\$1,606,382	\$0			\$3,753,746	\$699,457	\$4,453,203	\$9,392,023	\$59,066,307	\$49,674,284
Mar-00	\$2,227,071	\$1,501,788	\$0			\$3,728,859	\$457,115	\$4,185,974	\$9,849,138	\$63,252,281	\$53,403,143
Apr-00	\$1,650,460	\$866,914	\$11,678			\$2,529,053	\$120,373	\$2,649,425	\$9,969,510	\$65,901,706	\$55,932,196
May-00	\$2,044,089	\$1,000,117	\$13,276			\$3,057,481	\$150,316	\$3,207,797	\$10,119,826	\$69,109,503	\$58,989,677
Jun-00	\$1,004,800	\$554,738	\$14,060			\$1,573,599	\$68,996	\$1,642,595	\$10,188,822	\$70,752,098	\$60,563,276
Jul-00	\$710,130	\$432,868	\$11,315			\$1,154,313	\$46,821	\$1,201,134	\$10,235,643	\$71,953,232	\$61,717,589
Aug-00	\$1,567,967	\$623,002	\$20,452			\$2,211,421	\$58,508	\$2,269,929	\$10,294,151	\$74,223,161	\$63,929,009

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Sep-00	\$1,549,256	\$748,851	\$17,637			\$2,315,744	\$51,350	\$2,367,095	\$10,345,502	\$76,590,255	\$66,244,753
Oct-00	\$2,706,833	\$1,056,352	\$13,042			\$3,776,227	\$121,841	\$3,898,068	\$10,467,343	\$80,488,323	\$70,020,980
Nov-00	\$6,178,117	\$2,092,866	\$38,268			\$8,309,251	\$208,106	\$8,517,357	\$10,675,449	\$89,005,680	\$78,330,231
Dec-00	\$13,810,672	\$4,534,145	\$45,946			\$18,390,763	\$538,633	\$18,929,396	\$11,214,082	\$107,935,076	\$96,720,994
Jan-01	\$14,432,877	\$3,812,320	\$0			\$18,245,197	\$752,288	\$18,997,484	\$11,966,369	\$126,932,560	\$114,966,191
Feb-01	\$17,203,007	\$4,588,353	\$0			\$21,791,360	\$723,181	\$22,514,541	\$12,689,551	\$149,447,101	\$136,757,550
Mar-01	\$14,710,273	\$4,050,611	\$0			\$18,760,884	\$693,255	\$19,454,138	\$13,382,805	\$168,901,239	\$155,518,434
Apr-01	\$9,859,471	\$2,860,423	\$0			\$12,719,894	\$571,992	\$13,291,885	\$13,954,797	\$182,193,125	\$168,238,328
May-01	\$3,855,778	\$1,247,301	\$18,417			\$5,121,496	\$155,768	\$5,277,264	\$14,110,565	\$187,470,389	\$173,359,824
Jun-01	\$2,754,276	\$997,069	\$9,968			\$3,761,313	\$114,641	\$3,875,954	\$14,225,206	\$191,346,342	\$177,121,136
Jul-01	\$1,598,501	\$603,386	\$8,469			\$2,210,356	\$69,621	\$2,279,976	\$14,294,827	\$193,626,319	\$179,331,492
Aug-01	-\$387,396	-\$36,966	\$3,322			-\$421,041	\$48,501	-\$372,539	\$14,343,328	\$193,253,779	\$178,910,452
Sep-01	-\$541,007	-\$101,867	\$214			-\$642,660	\$44,301	-\$598,359	\$14,387,629	\$192,655,420	\$178,267,791
Oct-01	-\$903,224	-\$246,449	\$1,115			-\$1,148,558	\$95,536	-\$1,053,022	\$14,483,165	\$191,602,398	\$177,119,233
Nov-01	-\$4,785,389	-\$1,519,422	\$0			-\$6,304,811	\$166,584	-\$6,138,228	\$14,649,748	\$185,464,170	\$170,814,422
Dec-01	-\$6,417,765	-\$2,190,879	\$0			-\$8,608,644	\$241,333	-\$8,367,311	\$14,891,081	\$177,096,859	\$162,205,778
Jan-02	-\$11,213,067	-\$4,009,360	-\$24,850			-\$15,247,278	\$456,852	-\$14,790,425	\$15,347,933	\$162,306,434	\$146,958,501
Feb-02	-\$8,931,637	-\$3,242,954	-\$16,811			-\$12,191,402	\$342,231	-\$11,849,171	\$15,690,165	\$150,457,263	\$134,767,098
Mar-02	-\$6,934,816	-\$2,364,856	-\$15,592			-\$9,315,264	\$355,597	-\$8,959,667	\$16,045,761	\$141,497,596	\$125,451,834
Apr-02	-\$5,332,798	-\$1,839,321	\$0			-\$7,172,119	\$295,298	-\$6,876,821	\$16,341,060	\$134,620,775	\$118,279,715
May-02	-\$3,351,622	-\$1,404,541	-\$8,027			-\$4,764,190	\$158,107	-\$4,606,083	\$16,499,167	\$130,014,691	\$113,515,525
Jun-02	-\$2,013,498	-\$738,132	-\$5,322			-\$2,756,952	\$94,387	-\$2,662,565	\$16,593,553	\$127,352,126	\$110,758,573
Jul-02	-\$1,101,529	-\$456,628	-\$3,312			-\$1,561,469	\$50,750	-\$1,510,718	\$16,644,304	\$125,841,408	\$109,197,104
Aug-02	\$236,023	\$130,777	\$675			\$367,475	\$44,089	\$411,564	\$16,688,393	\$126,252,972	\$109,564,579
Sep-02	\$135,406	\$121,064	-\$9			\$256,461	\$41,585	\$298,046	\$16,729,978	\$126,551,017	\$109,821,040
Oct-02	\$156,437	\$113,894	-\$197			\$270,134	\$62,349	\$332,483	\$16,792,327	\$126,883,501	\$110,091,174
Nov-02	\$771,332	\$309,783	\$1,902			\$1,083,017	\$217,814	\$1,300,831	\$17,010,141	\$128,184,332	\$111,174,191
Dec-02	\$726,676	-\$6,217	\$1,461			\$721,920	\$392,134	\$1,114,055	\$17,402,276	\$129,298,386	\$111,896,111
Jan-03	\$1,102,780	-\$1,000,067	\$0			\$102,713	\$519,274	\$621,987	\$17,921,549	\$129,920,374	\$111,998,824
Feb-03	\$5,523,850	\$1,167,509	\$8,870			\$6,700,229	\$655,759	\$7,355,988	\$18,577,309	\$137,276,361	\$118,699,053
Mar-03	\$4,199,337	\$509,070	\$2,948			\$4,711,356	\$601,685	\$5,313,041	\$19,178,994	\$142,589,403	\$123,410,409
Apr-03	\$5,673,189	\$1,770,099	\$7,841			\$7,451,129	\$236,472	\$7,687,601	\$19,415,466	\$150,277,004	\$130,861,538
May-03	\$4,007,475	\$1,296,707	\$8,797			\$5,312,980	\$124,194	\$5,437,173	\$19,539,660	\$155,714,177	\$136,174,517
Jun-03	\$2,563,180	\$1,013,374	\$5,887			\$3,582,441	\$84,048	\$3,666,490	\$19,623,708	\$159,380,667	\$139,756,959
Jul-03	\$1,385,724	\$674,473	\$3,314			\$2,063,510	\$44,755	\$2,108,266	\$19,668,464	\$161,488,933	\$141,820,469
Aug-03	-\$199,255	-\$82,351	-\$218			-\$281,823	\$38,953	-\$242,870	\$19,707,417	\$161,246,063	\$141,538,646
Sep-03	-\$122,424	\$3,139	-\$212			-\$119,498	\$38,189	-\$81,310	\$19,745,605	\$161,164,753	\$141,419,148
Oct-03	-\$192,077	\$100,989	-\$697			-\$91,785	\$87,000	-\$4,785	\$19,832,605	\$161,159,968	\$141,327,363
Nov-03	-\$2,676,204	-\$786,416	-\$9,233			-\$3,471,853	\$130,215	-\$3,341,638	\$19,962,820	\$157,818,330	\$137,855,510
Dec-03	-\$5,412,084	-\$2,327,899	-\$14,949			-\$7,754,932	\$251,134	-\$7,503,798	\$20,213,955	\$150,314,533	\$130,100,578
Jan-04	-\$11,732,403	-\$4,826,612	-\$27,265			-\$16,586,279	\$369,962	-\$16,216,317	\$20,583,916	\$134,098,215	\$113,514,299

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Feb-04	-\$10,668,507	-\$4,004,885	-\$17,696			-\$14,691,088	\$447,855	-\$14,243,234	\$21,031,771	\$119,854,982	\$98,823,211
Mar-04	-\$7,356,309	-\$2,355,718	-\$10,959			-\$9,722,986	\$334,371	-\$9,388,615	\$21,366,142	\$110,466,366	\$89,100,225
Apr-04	-\$5,408,848	-\$1,596,368	-\$7,561			-\$7,012,777	\$0	-\$7,012,777	\$21,366,142	\$103,453,590	\$82,087,448
May-04	-\$1,849,168	-\$361,959	-\$2,501			-\$2,213,629	\$0	-\$2,213,629	\$21,366,142	\$101,239,961	\$79,873,819
Jun-04	-\$973,902	-\$145,292	-\$1,036			-\$1,120,230	\$0	-\$1,120,230	\$21,366,142	\$100,119,732	\$78,753,590
Jul-04	-\$913,368	-\$223,736	-\$114,560			-\$1,251,664	\$0	-\$1,251,664	\$21,366,142	\$98,868,068	\$77,501,926
Aug-04	-\$116,386	\$54,895	\$0			-\$61,491	\$0	-\$61,491	\$21,366,142	\$98,806,577	\$77,440,435
Sep-04	\$10,843	\$67,262	\$1,170			\$79,275	\$0	\$79,275	\$21,366,142	\$98,885,852	\$77,519,710
Oct-04	-\$42,681	\$137,841	\$1,460			\$96,620	\$0	\$96,620	\$21,366,142	\$98,982,472	\$77,616,330
Nov-04	-\$1,538,128	-\$436,246	-\$3,391			-\$1,977,765	\$0	-\$1,977,765	\$21,366,142	\$97,004,707	\$75,638,565
Dec-04	-\$1,502,379	-\$806,935	-\$4,559			-\$2,313,873	\$0	-\$2,313,873	\$21,366,142	\$94,690,834	\$73,324,692
Jan-05	-\$1,578,126	-\$1,005,151	-\$2,823			-\$2,586,099	\$0	-\$2,586,099	\$21,366,142	\$92,104,734	\$70,738,593
Feb-05	-\$7,501,073	-\$2,234,889	-\$14,464			-\$9,750,426	\$0	-\$9,750,426	\$21,366,142	\$82,354,308	\$60,988,166
Mar-05	-\$7,712,573	-\$2,518,040	-\$18,620			-\$10,249,233	\$0	-\$10,249,233	\$21,366,142	\$72,105,075	\$50,738,933
Apr-05	-\$1,844,632	-\$704,283	-\$5,848			-\$2,554,763	\$0	-\$2,554,763	\$21,366,142	\$69,550,312	\$48,184,170
May-05	-\$1,616,796	-\$210,553	-\$2,467			-\$1,829,816	\$0	-\$1,829,816	\$21,366,142	\$67,720,496	\$46,354,354
Jun-05	-\$845,291	-\$44,472	-\$4,230			-\$893,993	\$0	-\$893,993	\$21,366,142	\$66,826,503	\$45,460,361
Jul-05	-\$739,294	-\$31,196	-\$621			-\$771,110	\$0	-\$771,110	\$21,366,142	\$66,055,392	\$44,689,251
Aug-05	-\$78,266	\$70,916	\$0			-\$7,350	\$0	-\$7,350	\$21,366,142	\$66,048,042	\$44,681,901
Sep-05	\$210,761	\$100,586	\$1,038			\$312,384	\$0	\$312,384	\$21,366,142	\$66,360,427	\$44,994,285
Oct-05	\$847,001	-\$135,534	\$4,638			\$716,106	\$0	\$716,106	\$21,366,142	\$67,076,533	\$45,710,391
Nov-05	\$184,914	-\$1,283,433	\$10,074			-\$1,088,445	\$0	-\$1,088,445	\$21,366,142	\$65,988,088	\$44,621,946
Dec-05	\$185,165	-\$1,358,303	\$1,942			-\$1,171,195	\$0	-\$1,171,195	\$21,366,142	\$64,816,892	\$43,450,750
Jan-06	-\$961,598	-\$2,941,083	-\$150,058			-\$4,052,738	\$0	-\$4,052,738	\$21,366,142	\$60,764,154	\$39,398,012
Feb-06	-\$5,604,909	-\$3,093,449	-\$32,232			-\$8,730,590	\$0	-\$8,730,590	\$21,366,142	\$52,033,564	\$30,667,422
Mar-06	-\$11,177,508	-\$4,065,279	-\$42,318			-\$15,285,104	\$0	-\$15,285,104	\$21,366,142	\$36,748,459	\$15,382,317
Apr-06	-\$7,293,950	-\$2,287,715	-\$24,904			-\$9,606,569	\$53,181	-\$9,553,388	\$21,419,323	\$27,195,071	\$5,775,748
May-06	-\$3,926,951	-\$1,116,790	-\$12,355			-\$5,056,096	\$26,802	-\$5,029,294	\$21,446,125	\$22,165,777	\$719,652
Jun-06	-\$2,704,723	-\$598,065	-\$9,368			-\$3,312,155	\$14,795	-\$3,297,361	\$21,460,920	\$18,868,417	-\$2,592,503
Jul-06	-\$1,975,016	-\$494,379	-\$8,324			-\$2,477,718	\$8,309	-\$2,469,409	\$21,469,229	\$16,399,008	-\$5,070,221
Aug-06	-\$2,101,535	-\$420,782	-\$11,119			-\$2,533,436	\$8,075	-\$2,525,361	\$21,477,304	\$13,873,646	-\$7,603,658
Sep-06	-\$1,571,928	-\$516,412	-\$12,047			-\$2,100,387	\$8,066	-\$2,092,321	\$21,485,370	\$11,781,325	-\$9,704,045
Oct-06	-\$5,152,570	-\$1,734,363	-\$33,089			-\$6,920,021	\$17,003	-\$6,903,018	\$21,502,373	\$4,878,307	-\$16,624,066
Nov-06	-\$9,020,018	-\$2,654,434	-\$49,911			-\$11,724,363	\$40,939	-\$11,683,424	\$21,543,312	-\$6,805,117	-\$28,348,429
Dec-06	-\$12,714,226	-\$3,707,906	-\$75,247			-\$16,497,380	\$59,733	-\$16,437,647	\$21,603,046	-\$23,242,764	-\$44,845,809
Jan-07	-\$14,772,242	-\$5,844,496	-\$82,866			-\$20,699,603	\$71,970	-\$20,627,633	\$21,675,016	-\$43,870,396	-\$65,545,412
Feb-07	-\$21,638,440	-\$6,425,648	-\$62,487			-\$28,126,575	\$105,900	-\$28,020,675	\$21,780,916	-\$71,891,071	-\$93,671,988
Mar-07	-\$15,335,851	-\$5,020,217	-\$41,454			-\$20,397,523	\$91,869	-\$20,305,654	\$21,872,785	-\$92,196,725	-\$114,069,510
Apr-07	-\$13,730,839	-\$4,746,463	-\$38,360			-\$18,515,663	\$77,960	-\$18,437,702	\$21,950,745	-\$110,634,428	-\$132,585,173
May-07	-\$4,045,124	-\$1,461,868	-\$24,204			-\$5,531,196	\$41,549	-\$5,489,647	\$21,992,294	-\$116,124,075	-\$138,116,369
Jun-07	-\$1,824,264	-\$756,525	-\$6,479			-\$2,587,269	\$18,743	-\$2,568,525	\$22,011,037	-\$118,692,601	-\$140,703,638

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Jul-07	-\$1,575,114	-\$666,103	-\$11,375			-\$2,252,592	\$13,759	-\$2,238,833	\$22,024,796	-\$120,931,434	-\$142,956,230
Aug-07	-\$1,548,150	-\$648,202	-\$9,630			-\$2,205,982	\$11,085	-\$2,194,897	\$22,035,882	-\$123,126,330	-\$145,162,212
Sep-07	-\$1,483,832	-\$600,649	-\$7,762			-\$2,092,243	\$11,445	-\$2,080,798	\$22,047,327	-\$125,207,128	-\$147,254,455
Oct-07	-\$2,044,185	-\$731,511	-\$6,280			-\$2,781,976	\$14,771	-\$2,767,205	\$22,062,098	-\$127,974,333	-\$150,036,431
Nov-07	-\$4,561,749	-\$1,277,436	-\$4,391			-\$5,843,575	\$49,773	-\$5,793,803	\$22,111,871	-\$133,768,135	-\$155,880,006
Dec-07	-\$8,568,268	-\$2,599,283	-\$27,095			-\$11,194,646	\$104,032	-\$11,090,614	\$22,215,903	-\$144,858,749	-\$167,074,653
Jan-08	-\$10,096,120	-\$2,931,314	-\$24,470			-\$13,051,903	\$131,676	-\$12,920,228	\$22,347,579	-\$157,778,977	-\$180,126,556
Feb-08	-\$7,024,941	-\$1,824,434	-\$10,632			-\$8,860,007	\$141,785	-\$8,718,221	\$22,489,365	-\$166,497,198	-\$188,986,563
Mar-08	-\$7,533,256	-\$2,519,223	-\$13,759			-\$10,066,238	\$142,920	-\$9,923,318	\$22,632,284	-\$176,420,516	-\$199,052,801
Apr-08	-\$2,506,939	-\$950,180	\$2,713			-\$3,454,406	\$73,436	-\$3,380,970	\$22,705,720	-\$179,801,486	-\$202,507,206
May-08	-\$1,179,307	-\$749,652	\$856			-\$1,928,103	\$31,482	-\$1,896,621	\$22,737,202	-\$181,698,107	-\$204,435,310
Jun-08	-\$603,512	-\$565,362	-\$1,217			-\$1,170,091	\$20,328	-\$1,149,763	\$22,757,530	-\$182,847,870	-\$205,605,401
Jul-08	-\$121,880	-\$668,469	\$304			-\$790,044	\$11,537	-\$778,508	\$22,769,066	-\$183,626,378	-\$206,395,445
Aug-08	-\$920,216	-\$692,303	-\$1,841			-\$1,614,359	\$9,710	-\$1,604,649	\$22,778,777	-\$185,231,027	-\$208,009,805
Sep-08	-\$1,587,392	-\$1,011,676	-\$3,722			-\$2,602,790	\$8,792	-\$2,593,998	\$22,787,569	-\$187,825,025	-\$210,612,595
Oct-08	-\$2,969,271	-\$977,128	-\$6,760			-\$3,953,159	\$14,224	-\$3,938,935	\$22,801,793	-\$191,763,960	-\$214,565,754
Nov-08	-\$4,157,953	-\$925,308	\$4,846			-\$5,078,415	\$43,070	-\$5,035,346	\$22,844,862	-\$196,799,305	-\$219,644,169
Dec-08	-\$3,814,931	\$332,636	\$22,238			-\$3,460,056	\$92,916	-\$3,367,141	\$22,937,778	-\$200,166,446	-\$223,104,225
Jan-09	-\$28,681,170	-\$9,070,920	-\$72,169			-\$37,824,259	\$124,409	-\$37,699,849	\$23,062,188	-\$237,866,295	-\$260,928,484
Feb-09	-\$22,216,722	-\$6,779,101	-\$58,538			-\$29,054,361	\$125,729	-\$28,928,632	\$23,187,917	-\$266,794,927	-\$289,982,845
Mar-09	-\$14,231,242	-\$3,873,959	-\$28,150			-\$18,133,351	\$95,546	-\$18,037,806	\$23,283,463	-\$284,832,732	-\$308,116,196
Apr-09	-\$14,866,518	-\$4,294,526	-\$35,204			-\$19,196,248	\$14,350	-\$19,181,898	\$23,297,813	-\$304,014,630	-\$327,312,444
May-09	-\$8,101,872	-\$2,856,819	-\$18,422			-\$10,977,112	\$6,975	-\$10,970,138	\$23,304,788	-\$314,984,768	-\$338,289,557
Jun-09	-\$3,431,341	-\$1,247,366	-\$6,467			-\$4,685,174	\$3,592	-\$4,681,582	\$23,308,381	-\$319,666,350	-\$342,974,731
Jul-09	-\$2,737,380	-\$1,060,690	-\$5,052			-\$3,803,121	\$2,223	-\$3,800,898	\$23,310,604	-\$323,467,248	-\$346,777,852
Aug-09	-\$3,552,993	-\$1,512,985	-\$20,633			-\$5,086,611	\$2,092	-\$5,084,519	\$23,312,696	-\$328,551,766	-\$351,864,463
Sep-09	-\$3,368,242	-\$1,428,350	-\$19,836			-\$4,816,429	\$1,949	-\$4,814,479	\$23,314,646	-\$333,366,245	-\$356,680,892
Oct-09	-\$7,246,610	-\$2,384,038	-\$36,028			-\$9,666,676	\$4,560	-\$9,662,116	\$23,319,206	-\$343,028,362	-\$366,347,568
Nov-09	-\$11,737,467	-\$4,226,695	-\$54,205			-\$16,018,366	\$8,603	-\$16,009,764	\$23,327,808	-\$359,038,125	-\$382,365,935
Dec-09	-\$21,782,094	-\$7,865,117	-\$109,853			-\$29,757,064	\$14,783	-\$29,742,282	\$23,342,591	-\$388,780,407	-\$412,122,999
Jan-10	-\$40,572,070	-\$17,771,809	-\$190,682			-\$58,534,561	\$25,333	-\$58,509,229	\$23,367,923	-\$447,289,636	-\$470,657,560
Feb-10	-\$37,456,299	-\$17,263,379	-\$166,964			-\$54,886,642	\$23,999	-\$54,862,644	\$23,391,922	-\$502,152,279	-\$525,544,202
Mar-10	-\$29,544,799	-\$12,895,726	-\$125,155			-\$42,565,680	\$20,305	-\$42,545,375	\$23,412,227	-\$544,697,654	-\$568,109,882
Apr-10	-\$10,205,850	-\$5,302,857	-\$44,161			-\$15,552,868	\$0	-\$15,552,868	\$23,412,227	-\$560,250,522	-\$583,662,750
May-10	-\$5,030,596	-\$1,850,366	-\$11,344			-\$6,892,306	\$0	-\$6,892,306	\$23,412,227	-\$567,142,828	-\$590,555,056
Jun-10	-\$3,111,808	-\$1,367,655	-\$10,126			-\$4,489,589	\$0	-\$4,489,589	\$23,412,227	-\$571,632,417	-\$595,044,645
Jul-10	-\$2,355,905	-\$929,182	-\$4,453			-\$3,289,540	\$0	-\$3,289,540	\$23,412,227	-\$574,921,957	-\$598,334,185
Aug-10	-\$1,906,242	-\$750,001	-\$3,512			-\$2,659,755	\$0	-\$2,659,755	\$23,412,227	-\$577,581,712	-\$600,993,940
Sep-10	-\$2,515,082	-\$1,055,284	-\$11,219			-\$3,581,584	\$0	-\$3,581,584	\$23,412,227	-\$581,163,296	-\$604,575,524
Oct-10	-\$3,682,710	-\$1,296,045	-\$13,255			-\$4,992,010	\$0	-\$4,992,010	\$23,412,227	-\$586,155,306	-\$609,567,534
Nov-10	-\$8,929,195	-\$2,980,686	-\$36,259			-\$11,946,139	\$0	-\$11,946,139	\$23,412,227	-\$598,101,446	-\$621,513,674

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Dec-10	-\$14,247,734	-\$4,376,832	-\$31,214			-\$18,655,779	\$0	-\$18,655,779	\$23,412,227	-\$616,757,225	-\$640,169,453
Jan-11	-\$20,178,145	-\$7,226,845	-\$66,450			-\$27,471,440	\$0	-\$27,471,440	\$23,412,227	-\$644,228,665	-\$667,640,894
Feb-11	-\$17,503,090	-\$6,663,572	-\$57,222			-\$24,223,884	\$0	-\$24,223,884	\$23,412,227	-\$668,452,549	-\$691,864,778
Mar-11	-\$15,140,570	-\$5,431,256	-\$49,063			-\$20,620,889	\$0	-\$20,620,889	\$23,412,227	-\$689,073,439	-\$712,485,667
Apr-11	-\$9,382,832	-\$2,899,984	-\$22,843			-\$12,305,658	\$0	-\$12,305,658	\$23,412,227	-\$701,379,096	-\$724,791,324
May-11	-\$5,043,450	-\$1,581,832	-\$15,485			-\$6,640,768	\$0	-\$6,640,768	\$23,412,227	-\$708,019,864	-\$731,432,092
Jun-11	-\$2,526,502	-\$908,185	-\$7,605			-\$3,442,292	\$0	-\$3,442,292	\$23,412,227	-\$711,462,156	-\$734,874,384
Jul-11	-\$1,869,945	-\$802,740	-\$6,252			-\$2,678,937	\$0	-\$2,678,937	\$23,412,227	-\$714,141,094	-\$737,553,322
Aug-11	-\$1,695,636	-\$671,399	-\$4,174			-\$2,371,209	\$0	-\$2,371,209	\$23,412,227	-\$716,512,303	-\$739,924,531
Sep-11	-\$2,030,481	-\$881,393	-\$7,308			-\$2,919,182	\$0	-\$2,919,182	\$23,412,227	-\$719,431,485	-\$742,843,713
Oct-11	-\$3,140,807	-\$1,164,355	-\$10,329			-\$4,315,491	\$0	-\$4,315,491	\$23,412,227	-\$723,746,976	-\$747,159,204
Nov-11	-\$6,997,438	-\$2,263,598	-\$34,310			-\$9,295,346	\$0	-\$9,295,346	\$23,412,227	-\$733,042,322	-\$756,454,550
Dec-11	-\$12,557,750	-\$3,945,419	-\$64,240			-\$16,567,409	\$0	-\$16,567,409	\$23,412,227	-\$749,609,731	-\$771,432,959
Jan-12	-\$18,651,178	-\$5,916,444	-\$76,824			-\$24,644,446	\$0	-\$24,644,446	\$23,412,227	-\$774,254,177	-\$797,666,405
Feb-12	-\$20,382,726	-\$6,813,519	-\$80,778			-\$27,277,024	\$0	-\$27,277,024	\$23,412,227	-\$801,531,201	-\$824,943,429
Mar-12	-\$16,793,300	-\$5,589,328	-\$60,396			-\$22,443,024	\$0	-\$22,443,024	\$23,412,227	-\$823,974,225	-\$847,386,453
Apr-12	-\$9,349,064	-\$3,600,962	-\$45,096			-\$12,995,122	\$0	-\$12,995,122	\$23,412,227	-\$836,969,347	-\$860,381,575
May-12	-\$7,406,658	-\$2,572,108	-\$29,530			-\$10,008,296	\$0	-\$10,008,296	\$23,412,227	-\$846,977,643	-\$870,389,871
Jun-12	-\$3,202,658	-\$1,327,809	-\$13,942			-\$4,544,409	\$0	-\$4,544,409	\$23,412,227	-\$851,522,052	-\$874,934,280
Jul-12	-\$2,380,923	-\$1,043,505	-\$7,700			-\$3,432,128	\$0	-\$3,432,128	\$23,412,227	-\$854,954,180	-\$878,366,408
Aug-12	-\$1,986,608	-\$848,902	-\$8,092			-\$2,843,602	\$0	-\$2,843,602	\$23,412,227	-\$857,797,782	-\$881,210,010
Sep-12	-\$2,321,318	-\$1,044,077	-\$11,926			-\$3,377,321	\$0	-\$3,377,321	\$23,412,227	-\$861,175,104	-\$884,587,332
Oct-12	-\$3,653,559	-\$1,102,057	-\$11,358			-\$4,766,974	\$0	-\$4,766,974	\$23,412,227	-\$865,942,077	-\$889,354,306
Nov-12	-\$7,303,123	-\$2,016,031	-\$30,021			-\$9,349,175	\$0	-\$9,349,175	\$23,412,227	-\$875,291,253	-\$898,703,481
Dec-12	-\$10,718,224	-\$3,009,674	-\$34,951			-\$13,762,849	\$0	-\$13,762,849	\$23,412,227	-\$889,054,102	-\$912,466,330
Jan-13	-\$17,561,829	-\$5,237,632	-\$51,727			-\$22,851,187	\$0	-\$22,851,187	\$23,412,227	-\$911,905,289	-\$935,317,517
Feb-13	-\$18,925,582	-\$5,598,939	-\$45,406			-\$24,569,927	\$0	-\$24,569,927	\$23,412,227	-\$936,475,216	-\$959,887,444
Mar-13	-\$16,218,739	-\$4,350,721	-\$28,889			-\$20,598,350	\$0	-\$20,598,350	\$23,412,227	-\$957,073,565	-\$980,485,793
Apr-13	-\$9,824,400	-\$2,408,704	-\$10,098			-\$12,243,202	\$0	-\$12,243,202	\$23,412,227	-\$969,316,767	-\$992,728,995
May-13	-\$3,969,390	-\$1,005,427	-\$8,133			-\$4,982,951	\$0	-\$4,982,951	\$23,412,227	-\$974,299,717	-\$997,711,946
Jun-13	-\$2,415,361	-\$657,077	-\$4,765			-\$3,077,203	\$0	-\$3,077,203	\$23,412,227	-\$977,376,921	-\$1,000,789,149
Jul-13	-\$2,215,582	-\$723,016	-\$6,497			-\$2,945,095	\$0	-\$2,945,095	\$23,412,227	-\$980,322,016	-\$1,003,734,244
Aug-13	-\$2,138,758	-\$765,977	-\$8,254			-\$2,912,988	\$0	-\$2,912,988	\$23,412,227	-\$983,235,004	-\$1,006,647,232
Sep-13	-\$2,047,364	-\$639,512	-\$6,073			-\$2,692,950	\$0	-\$2,692,950	\$23,412,227	-\$985,927,954	-\$1,009,340,182
Oct-13	-\$2,815,864	-\$818,831	-\$16,192			-\$3,650,886	\$0	-\$3,650,886	\$23,412,227	-\$989,578,840	-\$1,012,991,068
Nov-13	-\$7,562,682	-\$2,155,379	-\$62,083			-\$9,780,144	\$0	-\$9,780,144	\$23,412,227	-\$999,358,984	-\$1,022,771,212
Dec-13	-\$13,763,019	-\$3,797,676	-\$51,496			-\$17,612,191	\$0	-\$17,612,191	\$23,412,227	-\$1,016,971,175	-\$1,040,383,403
Jan-14	-\$15,981,935	-\$4,344,835	-\$46,431			-\$20,373,200	\$0	-\$20,373,200	\$23,412,227	-\$1,037,344,376	-\$1,060,756,604
Feb-14	-\$8,748,912	-\$792,898	\$6,411			-\$9,535,399	\$0	-\$9,535,399	\$23,412,227	-\$1,046,879,775	-\$1,070,292,003
Mar-14	-\$15,113,887	-\$4,423,825	-\$45,744			-\$19,583,455	\$0	-\$19,583,455	\$23,412,227	-\$1,066,463,230	-\$1,089,875,458
Apr-14	-\$9,661,541	-\$2,203,349	-\$20,533			-\$11,885,423	\$0	-\$11,885,423	\$23,412,227	-\$1,078,348,653	-\$1,101,760,881

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
May-14	-\$4,308,980	-\$879,750	-\$7,338	\$38,047	\$34,335	-\$5,123,687	\$0	-\$5,123,687	\$23,412,227	-\$1,083,472,340	-\$1,106,884,568
Jun-14	-\$2,499,474	-\$638,593	-\$5,820	-\$5,630	\$61,031	-\$3,088,486	\$0	-\$3,088,486	\$23,412,227	-\$1,086,560,826	-\$1,109,973,054
Jul-14	-\$2,327,035	-\$625,615	-\$6,631	-\$42,096	\$59,117	-\$2,942,259	\$0	-\$2,942,259	\$23,412,227	-\$1,089,503,084	-\$1,112,915,312
Aug-14	-\$2,581,985	-\$750,265	-\$8,389	-\$63,833	\$77,033	-\$3,327,439	\$0	-\$3,327,439	\$23,412,227	-\$1,092,830,524	-\$1,116,242,752
Sep-14	-\$2,569,170	-\$632,911	-\$6,336	-\$17,212	\$67,644	-\$3,157,984	\$0	-\$3,157,984	\$23,412,227	-\$1,095,988,508	-\$1,119,400,736
Oct-14	-\$3,731,082	-\$814,930	-\$12,555	\$37,077	\$73,254	-\$4,448,236	\$0	-\$4,448,236	\$23,412,227	-\$1,100,436,744	-\$1,123,848,972
Nov-14	-\$8,519,324	-\$1,952,682	-\$35,137	\$30,825	\$67,232	-\$10,409,087	\$0	-\$10,409,087	\$23,412,227	-\$1,110,845,831	-\$1,134,258,059
Dec-14	-\$12,884,435	-\$3,090,609	-\$61,504	\$47,032	\$48,796	-\$15,940,721	\$0	-\$15,940,721	\$23,412,227	-\$1,126,786,552	-\$1,150,198,780
Jan-15	-\$24,103,802	-\$6,731,228	-\$96,765	\$101,261	\$40,306	-\$30,790,227	\$0	-\$30,790,227	\$23,412,227	-\$1,157,576,779	-\$1,180,989,007
Feb-15	-\$27,342,772	-\$7,357,262	-\$106,216	\$169,688	\$18,540	-\$34,618,022	\$0	-\$34,618,022	\$23,412,227	-\$1,192,194,801	-\$1,215,607,029
Mar-15	-\$23,346,881	-\$6,432,525	-\$96,751	\$245,073	\$25,336	-\$29,605,747	\$0	-\$29,605,747	\$23,412,227	-\$1,221,800,548	-\$1,245,212,776
Apr-15	-\$13,206,425	-\$3,819,985	-\$60,265	\$73,304	\$18,404	-\$16,994,968	\$0	-\$16,994,968	\$23,412,227	-\$1,238,795,516	-\$1,262,207,744
May-15	-\$5,874,990	-\$1,659,536	-\$24,504	\$63,709	\$19,577	-\$7,475,743	\$0	-\$7,475,743	\$23,412,227	-\$1,246,271,259	-\$1,269,683,488
Jun-15	-\$3,022,034	-\$953,870	-\$14,081	\$6,185	\$31,353	-\$3,952,446	\$0	-\$3,952,446	\$23,412,227	-\$1,250,223,705	-\$1,273,635,933
Jul-15	-\$2,517,799	-\$838,616	-\$11,460	\$13,055	\$35,924	-\$3,318,895	\$0	-\$3,318,895	\$23,412,227	-\$1,253,542,601	-\$1,276,954,829
Aug-15	-\$2,236,562	-\$706,709	-\$12,089	-\$34,315	\$82,867	-\$2,906,808	\$0	-\$2,906,808	\$23,412,227	-\$1,256,449,408	-\$1,279,861,636
Sep-15	-\$2,421,039	-\$776,506	-\$12,446	\$3,354	\$49,646	-\$3,156,991	\$0	-\$3,156,991	\$23,412,227	-\$1,259,606,399	-\$1,283,018,627
Oct-15	-\$3,143,346	-\$990,394	-\$20,122	\$11,751	\$64,692	-\$4,077,419	\$0	-\$4,077,419	\$23,412,227	-\$1,263,683,818	-\$1,287,096,046
Nov-15	-\$6,647,549	-\$2,120,236	-\$42,765	\$32,806	\$78,831	-\$8,698,913	\$0	-\$8,698,913	\$23,412,227	-\$1,272,382,731	-\$1,295,794,959
Dec-15	-\$11,434,927	-\$3,771,764	-\$60,957	\$8,563	\$72,641	-\$15,186,444	\$0	-\$15,186,444	\$23,412,227	-\$1,287,569,175	-\$1,310,981,403
Jan-16	-\$16,112,731	-\$5,678,615	-\$94,065	-\$34,989	\$9,775	-\$21,910,625	\$0	-\$21,910,625	\$23,412,227	-\$1,309,479,800	-\$1,332,892,028
Feb-16	-\$18,597,905	-\$6,753,189	-\$119,339	-\$1,951	\$18,368	-\$25,454,015	\$0	-\$25,454,015	\$23,412,227	-\$1,334,933,815	-\$1,358,346,043
Mar-16	-\$15,872,469	-\$5,580,592	-\$102,175	\$7,502	\$13,209	-\$21,534,525	\$0	-\$21,534,525	\$23,412,227	-\$1,356,468,340	-\$1,379,880,568
Apr-16	-\$10,415,718	-\$3,156,401	-\$49,603	\$10,821	\$6,722	-\$13,604,179	\$0	-\$13,604,179	\$23,412,227	-\$1,370,072,519	-\$1,393,484,747
May-16	-\$5,964,571	-\$1,727,504	-\$24,245	-\$11,723	\$44,730	-\$7,683,313	\$0	-\$7,683,313	\$23,412,227	-\$1,377,755,832	-\$1,401,168,060
Jun-16	-\$3,487,938	-\$1,055,352	-\$14,102	-\$24,004	\$55,326	-\$4,526,070	\$0	-\$4,526,070	\$23,412,227	-\$1,382,281,902	-\$1,405,694,130
Jul-16	-\$1,991,284	-\$607,071	-\$6,338	-\$29,412	\$71,233	-\$2,562,872	\$0	-\$2,562,872	\$23,412,227	-\$1,384,844,774	-\$1,408,257,002
Aug-16	-\$2,033,848	-\$612,147	-\$6,595	-\$31,069	\$86,108	-\$2,597,551	\$0	-\$2,597,551	\$23,412,227	-\$1,387,442,325	-\$1,410,854,553
Sep-16	-\$2,009,458	-\$597,987	-\$7,340	-\$6,580	\$55,578	-\$2,565,788	\$0	-\$2,565,788	\$23,412,227	-\$1,390,008,113	-\$1,413,420,341
Oct-16	-\$2,257,699	-\$619,928	-\$10,332	\$67,158	\$80,285	-\$2,740,516	\$0	-\$2,740,516	\$23,412,227	-\$1,392,748,629	-\$1,416,160,857
Nov-16	-\$5,015,771	-\$1,363,107	-\$32,609	-\$46,694	\$1,689	-\$6,456,492	\$0	-\$6,456,492	\$23,412,227	-\$1,399,205,120	-\$1,422,617,349
Dec-16	-\$8,848,222	-\$2,602,060	-\$39,483	-\$52,895	\$77,846	-\$11,464,815	\$0	-\$11,464,815	\$23,412,227	-\$1,410,669,935	-\$1,434,082,163
Jan-17	-\$8,602,412	-\$1,932,895	-\$23,094	-\$197,580	\$16,657	-\$10,739,324	\$0	-\$10,739,324	\$23,412,227	-\$1,421,409,259	-\$1,444,821,488
Feb-17	-\$10,479,905	-\$3,212,465	-\$45,344	-\$189,553	\$20,621	-\$13,906,646	\$0	-\$13,906,646	\$23,412,227	-\$1,435,315,906	-\$1,458,728,134
Mar-17	-\$12,403,111	-\$3,981,768	-\$66,462	-\$14,808	\$13,044	-\$16,453,105	\$0	-\$16,453,105	\$23,412,227	-\$1,451,769,011	-\$1,475,181,239
Apr-17	-\$7,152,840	-\$2,079,943	-\$33,637	-\$44,992	\$20,985	-\$9,290,427	\$0	-\$9,290,427	\$23,412,227	-\$1,461,059,438	-\$1,484,471,666
May-17	-\$4,249,551	-\$1,084,496	-\$16,756	-\$19,605	\$51,743	-\$5,318,664	\$0	-\$5,318,664	\$23,412,227	-\$1,466,378,103	-\$1,489,790,331
Jun-17	-\$2,846,544	-\$749,126	-\$12,220	-\$29,457	\$67,299	-\$3,570,047	\$0	-\$3,570,047	\$23,412,227	-\$1,469,948,150	-\$1,493,360,378
Jul-17	-\$2,432,674	-\$673,504	-\$11,964	\$17,247	\$53,984	-\$3,046,912	\$0	-\$3,046,912	\$23,412,227	-\$1,472,995,062	-\$1,496,407,290
Aug-17	-\$2,371,761	-\$675,104	-\$12,487	\$2,572	\$16	-\$3,056,763	\$0	-\$3,056,763	\$23,412,227	-\$1,476,051,825	-\$1,499,464,053
Sep-17	-\$2,539,390	-\$714,249	-\$12,382	\$5,325	\$60,276	-\$3,200,419	\$0	-\$3,200,419	\$23,412,227	-\$1,479,252,244	-\$1,502,664,472

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Oct-17	-\$2,648,172	-\$744,642	-\$15,885	\$22,212	\$43,730	-\$3,342,756	\$0	-\$3,342,756	\$23,412,227	-\$1,482,595,000	-\$1,506,007,228
Nov-17	-\$7,587,488	-\$1,966,136	-\$50,909	\$30,457	\$50,781	-\$9,523,295	\$0	-\$9,523,295	\$23,412,227	-\$1,492,118,295	-\$1,515,530,523
Dec-17	-\$12,595,841	-\$3,405,446	-\$73,570	-\$42,110	\$70,159	-\$16,046,808	\$0	-\$16,046,808	\$23,412,227	-\$1,508,165,103	-\$1,531,577,331
Jan-18	-\$22,918,445	-\$6,713,323	-\$115,325	\$16,576	\$56,107	-\$29,674,409	\$0	-\$29,674,409	\$23,412,227	-\$1,537,839,513	-\$1,561,251,741
Feb-18	-\$11,398,416	-\$2,573,054	-\$37,638	\$32,141	\$35,553	-\$13,941,414	\$0	-\$13,941,414	\$23,412,227	-\$1,551,780,927	-\$1,575,193,155
Mar-18	-\$13,701,257	-\$4,102,488	-\$71,874	\$97,706	\$23,532	-\$17,754,381	\$0	-\$17,754,381	\$23,412,227	-\$1,569,535,308	-\$1,592,947,536
Apr-18	-\$14,252,376	-\$4,362,801	-\$80,331	\$48,637	\$20,711	-\$18,626,161	\$0	-\$18,626,161	\$23,412,227	-\$1,588,161,468	-\$1,611,573,696
May-18	-\$6,279,749	-\$1,859,047	-\$35,776	\$20,324	\$15,933	-\$8,138,314	\$0	-\$8,138,314	\$23,412,227	-\$1,596,299,783	-\$1,619,712,011
Jun-18	-\$2,785,837	-\$866,876	-\$13,609	\$15,332	\$43,914	-\$3,607,076	\$0	-\$3,607,076	\$23,412,227	-\$1,599,906,859	-\$1,623,319,087
Jul-18	-\$2,391,788	-\$728,416	-\$12,355	\$17,243	\$71,279	-\$3,044,037	\$0	-\$3,044,037	\$23,412,227	-\$1,602,950,896	-\$1,626,363,124
Aug-18	-\$2,370,543	-\$763,545	-\$11,058	-\$8,968	\$73,229	-\$3,080,885	\$0	-\$3,080,885	\$23,412,227	-\$1,606,031,780	-\$1,629,444,009
Sep-18	-\$2,377,345	-\$747,286	-\$11,546	\$8,187	\$48,877	-\$3,079,113	\$0	-\$3,079,113	\$23,412,227	-\$1,609,110,894	-\$1,632,523,122
Oct-18	-\$3,048,855	-\$877,058	-\$21,557	-\$8,173	\$41,244	-\$3,914,399	\$0	-\$3,914,399	\$23,412,227	-\$1,613,025,293	-\$1,636,437,521
Nov-18	-\$8,245,795	-\$2,195,153	-\$46,857	\$49,759	\$57,367	-\$10,380,680	\$0	-\$10,380,680	\$23,412,227	-\$1,623,405,972	-\$1,646,818,201
Dec-18	-\$7,107,855	-\$486,892	-\$11,127	-\$131,642	\$36,444	-\$7,701,071	\$0	-\$7,701,071	\$23,412,227	-\$1,631,107,044	-\$1,654,519,272
Jan-19	-\$14,432,062	-\$4,330,882	-\$90,482	-\$9,463	-\$117,386	-\$18,980,275	\$0	-\$18,980,275	\$23,412,227	-\$1,650,087,319	-\$1,673,499,547
Feb-19	-\$20,526,817	-\$6,533,568	-\$128,396	\$24,773	\$23,583	-\$27,140,424	\$0	-\$27,140,424	\$23,412,227	-\$1,636,251,318	-\$1,659,663,546
Mar-19	-\$17,106,315	-\$5,386,552	-\$109,858	-\$51,686	-\$1,770	-\$22,656,180	\$0	-\$22,656,180	\$23,412,227	-\$1,658,907,497	-\$1,682,319,726
Apr-19	-\$11,367,867	-\$3,623,774	-\$74,339	\$49,716	\$10,455	-\$15,005,809	\$0	-\$15,005,809	\$23,412,227	-\$1,673,913,306	-\$1,697,325,534
May-19	-\$6,410,621	-\$1,840,759	-\$28,594	\$17,288	\$30,188	-\$8,232,499	\$0	-\$8,232,499	\$23,412,227	-\$1,682,145,805	-\$1,705,558,033
Jun-19	-\$3,592,368	-\$1,200,432	-\$15,590	-\$6,574	\$26,184	-\$4,788,780	\$0	-\$4,788,780	\$23,412,227	-\$1,686,934,584	-\$1,710,346,813
Jul-19	-\$2,998,675	-\$1,087,420	-\$14,994	\$18,709	\$39,386	-\$4,042,994	\$0	-\$4,042,994	\$23,412,227	-\$1,690,977,578	-\$1,714,389,806
Aug-19	-\$2,813,061	-\$1,067,297	-\$15,342	\$18,693	\$40,760	-\$3,836,246	\$0	-\$3,836,246	\$23,412,227	-\$1,694,813,825	-\$1,718,226,053
Sep-19	-\$2,859,421	-\$1,071,283	-\$14,214	\$25,450	\$46,097	-\$3,873,371	\$0	-\$3,873,371	\$23,412,227	-\$1,698,687,196	-\$1,722,099,424
Oct-19	-\$3,348,874	-\$1,102,361	-\$19,762	\$2,084	\$44,122	-\$4,424,791	\$0	-\$4,424,791	\$23,412,227	-\$1,703,111,987	-\$1,726,524,215
Nov-19	-\$8,645,982	-\$2,655,864	-\$57,042	\$107,477	\$56,498	-\$11,194,913	\$0	-\$11,194,913	\$23,412,227	-\$1,714,306,900	-\$1,737,719,128
Dec-19	-\$16,457,094	-\$5,480,208	-\$131,140	\$96,260	\$42,802	-\$21,929,380	\$0	-\$21,929,380	\$23,412,227	-\$1,736,236,280	-\$1,759,648,508
Jan-20	-\$18,659,395	-\$6,818,494	-\$157,018	\$112,697	\$23,420	-\$25,498,789	\$0	-\$25,498,789	\$23,412,227	-\$1,761,735,069	-\$1,785,147,297
Feb-20	-\$20,153,919	-\$7,318,893	-\$164,857	\$119,648	\$8,427	-\$25,498,789	\$0	-\$27,509,594	\$23,412,227	-\$1,789,244,663	-\$1,812,656,891
Mar-20	-\$18,103,090	-\$6,385,425	-\$141,270	\$82,100	\$4,253	-\$25,498,789	\$0	-\$24,543,434	\$23,412,227	-\$1,813,788,097	-\$1,837,200,325
Apr-20	-\$13,271,864	-\$4,320,014	-\$95,686	\$60,573	\$7,402	-\$25,498,789	\$0	-\$17,619,589	\$23,412,227	-\$1,831,407,686	-\$1,854,819,914
May-20	-\$10,105,148	-\$3,022,800	-\$59,180	\$39,324	\$19,243	-\$25,498,789	\$0	-\$13,128,560	\$23,412,227	-\$1,844,536,246	-\$1,867,948,474
Jun-20	-\$4,981,287	-\$1,563,980	-\$27,330	\$26,538	\$29,521	-\$25,498,789	\$0	-\$6,516,538	\$23,412,227	-\$1,851,052,783	-\$1,874,465,012
Jul-20	-\$3,427,680	-\$1,231,796	-\$19,076	\$12,545	\$34,018	-\$25,498,789	\$0	-\$4,631,990	\$23,412,227	-\$1,855,684,773	-\$1,879,097,001
Aug-20	-\$2,885,618	-\$1,016,131	-\$16,235	\$14,923	\$37,981	-\$25,498,789	\$0	-\$3,865,080	\$23,412,227	-\$1,859,549,853	-\$1,882,962,081
Sep-20	-\$2,619,833	-\$818,632	-\$10,300	\$28,296	\$18,070	-\$25,498,789	\$0	-\$3,402,399	\$23,412,227	-\$1,862,952,253	-\$1,886,364,481
Oct-20	-\$4,316,431	-\$1,409,642	-\$24,376	\$30,873	\$40,906	-\$25,498,789	\$0	-\$5,678,670	\$23,412,227	-\$1,868,630,922	-\$1,892,043,150
Nov-20	-\$5,812,412	-\$1,607,908	-\$37,387	\$62,014	\$40,068	-\$25,498,789	\$0	-\$7,355,625	\$23,412,227	-\$1,875,986,547	-\$1,899,398,775
Dec-20	-\$11,200,126	-\$3,625,383	-\$80,765	\$106,855	\$47,245	-\$25,498,789	\$0	-\$14,752,175	\$23,412,227	-\$1,890,738,722	-\$1,914,150,950
Jan-21	-\$19,491,141	-\$6,666,876	-\$143,223	\$154,450	\$31,771	-\$26,115,017	\$0	-\$26,115,017	\$23,412,228	-\$1,916,853,739	-\$1,940,265,967
Feb-21	-\$21,196,479	-\$7,336,740	-\$152,312	\$156,417	\$4,674	-\$26,115,017	\$0	-\$28,524,440	\$23,412,227	-\$1,945,378,180	-\$1,968,790,408

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Mar-21	-\$20,318,419	-\$7,231,681	-\$154,242	\$99,776	\$10,154	-\$26,115,017	\$0	-\$27,594,413	\$23,412,227	-\$1,972,972,592	-\$1,996,384,820
Apr-21	-\$8,209,071	-\$2,226,020	-\$40,889	\$92,010	\$9,969	-\$26,115,017	\$0	-\$10,374,000	\$23,412,227	-\$1,983,346,592	-\$2,006,758,820
May-21	-\$5,479,371	-\$1,314,604	-\$16,485	\$85,657	\$34,582	-\$26,115,017	\$0	-\$6,690,222	\$23,412,227	-\$1,990,036,814	-\$2,013,449,042
Jun-21	-\$3,289,413	-\$864,557	-\$8,249	\$44,137	\$38,264	-\$26,115,017	\$0	-\$4,079,817	\$23,412,227	-\$1,994,116,631	-\$2,017,528,860