

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN EXAMINATION OF THE APPLICATION)	
OF THE FUEL ADJUSTMENT CLAUSE OF)	CASE NO. 2014-00225
KENTUCKY POWER COMPANY FROM)	
<u>NOVEMBER 1, 2013 THROUGH APRIL 30, 2014</u>)	

**PETITION TO AMEND PROCEDURAL SCHEDULE OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

On August 13, 2014, the Kentucky Public Service Commission (“Commission”) issued an Order opening the above-captioned proceeding. In its Order, the Commission states “[a]ny party who wishes to file testimony in this proceeding or to request information from Kentucky Power may petition the Commission for a procedural schedule.”¹ To assist the Commission in determining whether Kentucky Power’s allocation of fuel costs to: 1) native load; 2) all requirements Federal Energy Regulatory Commission (“FERC”) wholesale customers (Cities of Olive Hill and Vanceburg); and 3) off-system (e.g. intersystem) sales satisfied the standards set forth in 807 K.A.R. 5:056, KIUC respectfully petitions the Commission to amend the procedural schedule. Specifically, KIUC requests an Order allowing intervenors the opportunity to submit two rounds of data requests to Kentucky Power and to file written testimony.

I. Amending the Procedural Schedule Will Assist the Commission in Analyzing the Legality of Kentucky Power’s Fuel Cost Allocation During the Review Period.

Based upon currently available data, and without the benefit of formal discovery, KIUC is concerned that Kentucky Power’s fuel cost allocation approach during the review period resulted in the Company allocating above average fuel costs to native load customers and below average fuel costs to off-system (intersystem) sales.

¹ Order at 2.

We are uncertain how fuel costs are being allocated to the Company's two FERC all-requirements wholesale customers. KIUC raised this concern in an Informal Conference held June 26, 2014 with representatives for Kentucky Power, Commission Staff, the Attorney General, and Sierra Club in attendance. The issue was not resolved at that time. However, if Kentucky Power did adopt an approach of allocating above average fuel costs to native load sales and below average fuel costs to off-system sales, then KIUC seriously questions its legality under 807 K.A.R. 5:056 and KRS §278.030(1).

As the Commission is well-aware, Kentucky's fuel adjustment clause regulation is modeled upon the FERC's fuel adjustment clause regulation, 18 C.F.R. §35.14.² Accordingly, the Commission has repeatedly recognized that the FERC's interpretation of its fuel regulation can provide the Commission guidance on how Kentucky's fuel regulation should be interpreted.³ Both regulations are similar with respect to fuel costs associated with off-system (intersystem) sales. 807 K.A.R. 5:056(3) provides that fuel costs recovered through the Kentucky fuel adjustment clause include a number of costs "*less...the cost of fossil fuel recovered through intersystem sales including the fuel costs related to economy energy sales and other energy sold on an economic dispatch basis.*" 18 C.F.R. §35.14(a)(2) provides that fuel costs recovered through the FERC fuel adjustment clause include a number of costs "*less the cost of fossil and nuclear fuel recovered through all inter-system sales.*"

In a case involving Kentucky Power's affiliate, Appalachian Power Company ("APCO"), the FERC explained that a utility's fuel cost allocation approach should result in its lower fuel costs being allocated to native load customers, not to off-system sales. The FERC stated "*[w]e believe that it is both appropriate, and a common industry practice to assign the highest fuel cost to off-system sales, while lower fuel cost resources are reserved for the benefit of the APCO native load customers who, through their rates, provide for the construction and operation of the generating facilities.*"⁴

² Order, Case No. 96-524 (February 9, 1999) at 7; Order, Case Nos. 94-461-A (July 15, 1999) at 11 ("*Reviewing the purpose of Order 517 – the Order which established FERC's FAC Regulation and upon which Administrative Regulation 807 KAR 5:056 is modeled.*").

³ See Id.

⁴ Order Accepting Rates for Filing, Granting Intervention and Terminating Docket, Docket No. ER83-63-000 (December 17, 1982) at 2.

The FERC subsequently upheld this principle when addressing Southwestern Public Service Company's ("SPS") fuel cost allocation approach. In that case, SPS allocated system average fuel costs to both native load and off-system sales.⁵ The FERC rejected SPS' approach, finding that native load customers should not have to pay any of the higher incremental fuel costs associated with the utility's off-system sales.⁶ Hence, in the FERC's view, even a fuel cost allocation approach that requires both native load customers and off-system sales to pay *equally* (by allocating fuel costs on a system average basis) is unlawful. We fear that Kentucky Power is doing much worse. We fear that instead of allocating the same fuel cost to native load and off-system sales, that native load is paying above average fuel costs.

An approach that subsidizes off-system sales at the expense of native load customers is directly counter to the FERC's interpretation of its fuel adjustment clause regulation (which served as the basis for Kentucky's fuel adjustment clause regulation). KIUC wishes to conduct discovery to determine whether the Company adopted such an approach during the review period. KIUC also wishes to submit data requests regarding how Kentucky Power allocated fuel costs to its two wholesale all-requirements customers during the review period.

II. Amending the Procedural Schedule Will Provide Additional Opportunity to Explore Kentucky Power's Representations in the Mitchell Asset Transfer Case.

Additional information-gathering is also necessary in order to reconcile Kentucky Power's representations in Case No. 2012-00578 (the "Mitchell Transfer Case") with the actual impacts of the Mitchell asset transfer on fuel charges collected from customers during the review period. In the Mitchell Transfer Case, the Company represented that transferring half of the Mitchell generating assets to Kentucky Power would result in approximately \$16.75 million in fuel savings to native load customers. Specifically, the Stipulation in that case provided:

⁵Initial Decision, *Golden Spread Electric Cooperative, Inc. et al v. Southwestern Public Service Company*, 115 FERC ¶63,043 (May 24, 2006) at ¶132 ("Initial Decision"); Opinion No. 501, 123 FERC ¶61,047 (April 21, 2008) at ¶42-47.

⁶Opinion No. 501, 123 FERC ¶61,047 (April 21, 2008) at ¶42-47.

Because of the anticipated lower fuel costs of Mitchell Units 1 and 2 vis-a-vis the anticipated fuel costs of the Big Sandy units, the transfer of the Mitchell units to Kentucky Power is expected to provide Kentucky Power customers with the benefit of reduced fuel costs of approximately \$2.50/MWh. Based on 2012 jurisdictional kWh sales of 6.7 GWh, the benefits are estimated to total \$16.75 million annually.⁷

The Commission cited the anticipated \$16.75 million in fuel savings in its Order approving the Stipulation.⁸ Since the Mitchell asset transfer was effectuated, however, Kentucky Power's fuel charges have risen. At the June 26, 2014 Informal Conference, Kentucky Power attributed the recent rise in fuel costs to both the termination of the AEP Interconnection Agreement and the inclusion of Mitchell in its generation portfolio. While KIUC supports the Mitchell Transfer Case Stipulation, it also seeks an explanation of why the Mitchell transfer did not actually result in the fuel savings claimed by Kentucky Power.

It is also troubling that Kentucky Power may have allocated lower fuel costs to off-system sales at the expense of its native load customers during the period from January 1, 2014 through April 30, 2014. During that time, Kentucky Power was able to keep 100% of its profits from off-system sales, pursuant to the Mitchell Transfer Case Stipulation.⁹ By allocating lower fuel costs to off-system sales, Kentucky Power could have unreasonably increased its profit margins on those sales. KIUC seeks to develop this issue further to determine whether native load has been subsidizing off-system sales.

III. Amending the Procedural Schedule Will Allow Further Exploration of the Rationale for Allocating Any of the Lower Fuel Costs Associated with the Rockport Units to Off-System Sales.

Based upon the data currently available to KIUC, it appears as though the Rockport generating units have the lowest fuel costs on Kentucky Power's system, averaging \$24.66/MWh from November 2013 through March 2014.¹⁰ The 390 MW provided by the Rockport units can meet approximately 40% of Kentucky Power's native load energy requirements. Yet Kentucky Power appears to have allocated a significant amount of those low Rockport fuel costs to off-system sales, assigning as much as 46.28% of Rockport to off-system sales in February

⁷ Stipulation and Settlement Agreement, Case No. 2012-00578 (July 2, 2013) ("Mitchell Stipulation") at 5.

⁸ Order, Case No. 2012-00578 (October 7, 2013) at 33.

⁹ Mitchell Stipulation at 7.

¹⁰ Attachment A, Kentucky Power Company Sources and Disposition of Energy for FERC Type Fuel Cost Adjustment Clause, November 2013 through March 2014 Actual Data.

2014.¹¹ Hence, it is necessary to obtain discovery regarding why Kentucky Power appears to have allocated *any* of the Rockport fuel costs to off-system sales. Under traditional economic dispatch principles, Rockport should always be at the bottom of the generation stack and always used to serve native load whenever it is available.

IV. Amending the Procedural Schedule Will Allow Further Exploration of the Rationale for Allocating Any of the Higher Fuel Costs Associated with the Big Sandy Units to Native Load Customers.

In contrast to the Rockport units, the two Big Sandy generating units generally have the highest fuel costs on Kentucky Power's system. With Rockport and Mitchell both operating, neither Big Sandy unit is generally needed to meet the Company's native load energy needs.¹² Yet Kentucky Power appears to have assigned a significant portion of Big Sandy fuel costs to native load customers during the review period.¹³ For example, in March 2014, Big Sandy generated 295,855 MWh at an average fuel cost of \$31.379/MWh. Yet only 143,704 MWh (49%) of Big Sandy energy was assigned to off-system sales. And that assignment was made at a below average fuel cost of \$26.219/MWh. Mathematically, this would mean that the remaining Big Sandy energy was assigned to native load at an above average cost. Hence, it is necessary to obtain discovery regarding why Kentucky Power appears to have allocated *any* of the Big Sandy fuel costs to native load customers during the review period.

¹¹ Attachment A, February 2014 Actual Data (allocating 87,928 MWh of the 189,986 MWh generating by Rockport to off-system sales.

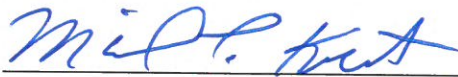
¹² See Attachment B, SNL Electric Sales Detail.

¹³ Attachment A, January 2014 through March 2014 Actual Data.

V. CONCLUSION

Because additional information surrounding Kentucky Power's fuel cost allocation approach during the review period is necessary to determine whether the requirements of 807 K.A.R. 5:056 and KRS §278.030(1) were met, KIUC respectfully requests that the Commission allow intervenors an opportunity to submit two rounds of discovery and submit written testimony. In the interests of efficiency, KIUC requests that the first set of intervenor discovery requests should be due one week after Kentucky Power's responses to the Commission's August 13, 2014 data requests are filed. Allowing intervenors an opportunity to more fully participate in this proceeding will help to develop a more comprehensive record, which will assist the Commission in its decision-making.

Respectfully submitted,



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August 20, 2014

ATTACHMENT A

KENTUCKY POWER COMPANY

SOURCES AND DISPOSITION OF ENERGY FOR
FERC TYPE FUEL COST ADJUSTMENT CLAUSE

FUEL IDENTIFIED PORTION (A/C 151 FUEL BASIS)

November 2013 ACTUAL

	<u>SOURCES OF ENERGY</u>	<u>MWH</u>	<u>AMOUNT</u> (<u>\$</u>)	<u>MILLS/kWh</u>
1. NET GENERATION:				
OWN FOSSIL GENERATION		35,869	2,075,967	57.876
ROCKPORT		240,252	6,112,024	25.440
TOTAL		276,121	8,187,991	29.654
OTHER PURCHASES (CASH SETTLED):				
2. SYSTEM POOL - PRIMARY & ECONOMY		352,669	8,310,983	23.566
AEP SYSTEM CASH PURCHASES		24,114	793,594	32.910
INTERRUPTIBLE BUY-THROUGH		0	0	0.000
TOTAL		376,783	9,104,576	24.164
TOTAL SOURCES (1+2)		652,904	17,292,567	26.486
3.				
	<u>DISPOSITION OF ENERGY</u>			
	<u>OFF SYSTEM ALLOCATION OF SOURCES:</u>			
4. SYSTEM POOL - PRIMARY & ECONOMY		0	0	0.000
ROCKPORT		35,753	832,337	23.328
AEP SYSTEM CASH PURCHASES		15,850	567,108	35.779
OWN GENERATION		5,467	174,956	32.001
INTERRUPTIBLE BUY-THROUGH		21	670	32.481
TOTAL		57,092	1,575,071	27.588
FUEL IDENTIFIED FOR NER (3-4)		595,812	15,717,497	26.380
5. TOTAL (4+5)		652,904	17,292,567	26.486
6.				
FUEL IDENTIFIED FOR NER (LINE 5 ABOVE)		595,812	15,717,497	26.380
NON-MONETARY INTER-COMPANY (RECEIPTS{+} DELIVERIES{-})		1	0	0.000
A. FUEL IDENTIFIED FOR NER (LINES A+B)		595,813	15,717,497	26.380
B. OUT-OF-PERIOD ADJUSTMENT - OSS Adj for PJM Load Recon		518	13,307	25.681
C. OUT-OF-PERIOD ADJUSTMENT - Pool Purch for PJM Load Recon		(518)	(13,307)	25.681
D. CONVENTIONAL HYDRO		0	0	0.000
E. TOTAL SUPPLY FOR NET ENERGY REQUIREMENT (NER)		595,813	15,717,497	26.37992
F.				
G.				

KENTUCKY POWER COMPANY

SOURCES AND DISPOSITION OF ENERGY FOR
FERC TYPE FUEL COST ADJUSTMENT CLAUSE

FUEL IDENTIFIED PORTION (A/C 151 FUEL BASIS)

December 2013 ACTUAL

	<u>SOURCES OF ENERGY</u>	<u>MWH</u>	<u>AMOUNT</u> [\$]	<u>MILLS/kWh</u>
1.	NET GENERATION:			
	OWN FOSSIL GENERATION	379,794	13,224,760	34.821
	ROCKPORT	272,982	6,894,592	25.257
	TOTAL	652,776	20,119,352	30.821
	OTHER PURCHASES (CASH SETTLED):			
2.	SYSTEM POOL - PRIMARY & ECONOMY	272,738	5,986,722	21.950
	AEP SYSTEM CASH PURCHASES	31,447	1,116,410	35.501
	INTERRUPTIBLE BUY-THROUGH	0	0	0.000
	TOTAL	304,185	7,103,131	23.351
	TOTAL SOURCES (1+2)	956,961	27,222,483	28.447
3.				
	<u>DISPOSITION OF ENERGY</u>			
	OFF SYSTEM ALLOCATION OF SOURCES:			
4.	SYSTEM POOL - PRIMARY & ECONOMY	54	1,655	30.821
	ROCKPORT	94,414	2,183,932	23.131
	AEP SYSTEM CASH PURCHASES	30,202	1,090,814	36.117
	OWN GENERATION	172,471	9,402,209	54.515
	INTERRUPTIBLE BUY-THROUGH	114	2,927	25.714
	TOTAL	297,254	12,681,537	42.652
	FUEL IDENTIFIED FOR NER (3-4)	659,707	14,540,946	22.042
5.	TOTAL (4+5)	956,961	27,222,483	28.447
6.				
	FUEL IDENTIFIED FOR NER (LINE 5 ABOVE)	659,707	14,540,946	22.042
	NON-MONETARY INTER-COMPANY (RECEIPTS(+)/DELIVERIES(-))	(0)	0	0.000
A.	FUEL IDENTIFIED FOR NER (LINES A+B)	659,707	14,540,946	22.042
B.	OUT-OF-PERIOD ADJUSTMENT - OSS Adj for PJM Load Recon	1,888	48,445	25.653
C.	OUT-OF-PERIOD ADJUSTMENT - Pool Purch for PJM Load Recon	(1,888)	(48,445)	25.653
D.	CONVENTIONAL HYDRO	0	0	0.000
E.	TOTAL SUPPLY FOR NET ENERGY REQUIREMENT (NER)	659,707	14,540,946	22.04152
F.				
G.				

KENTUCKY POWER COMPANY

06/25/14

SOURCES AND DISPOSITION OF ENERGY FOR
FERC TYPE FUEL COST ADJUSTMENT CLAUSE

FUEL IDENTIFIED PORTION (A/C 151 FUEL BASIS)

January 2014 ACTUAL

<u>SOURCES OF ENERGY</u>	<u>MWH</u>	<u>AMOUNT</u> (\$)	<u>\$ / MWH</u>
1. NET GENERATION:			
Big Sandy	611,150	19,054,146	31.178
Mitchell	359,030	10,854,140	30.232
Rockport	263,914	6,354,956	24.080
TOTAL	1,234,094	36,263,242	29,385
2. OTHER PURCHASES (CASH SETTLED):			
Third Party Power Purchase	75,824	7,100,285	93.642
TOTAL	75,824	7,100,285	93.642
3. TOTAL SOURCES (1+2)	1,309,918	43,363,527	33.104
<u>DISPOSITION OF ENERGY</u>			
4. OFF SYSTEM ALLOCATION OF SOURCES:			
Big Sandy	259,165	6,631,482	25.588
Mitchell	75,072	1,786,431	23.796
Rockport	106,810	2,352,919	22.029
Third Party Power Purchase	72,982	6,971,597	95.525
TOTAL	514,029	17,742,429	34.516
5. FUEL IDENTIFIED FOR NER (3-4)	795,889	25,621,098	32.192
6. TOTAL (4+5)	1,309,918	43,363,527	33.104
A. FUEL IDENTIFIED FOR NER (LINE 5 ABOVE)	795,889	25,621,098	32.192
B. NON-MONETARY COMPANY RECEIPTS AND DELIVERIES	0	0	0.000
C. FUEL IDENTIFIED FOR NER (LINES A+B)	795,889	25,621,098	32.192
D. OUT-OF-PERIOD ADJUSTMENT - OSS Adj for PJM Load Recon	709	6,890	9.715
E. OUT-OF-PERIOD ADJUSTMENT - Pool Purch for PJM Load Recon	(709)	(6,890)	9.715
F. CONVENTIONAL HYDRO	0	0	0.000
G. TOTAL SUPPLY FOR NET ENERGY REQUIREMENT (NER)	795,889	25,621,098	32.192

KENTUCKY POWER COMPANY

SOURCES AND DISPOSITION OF ENERGY FOR FERC TYPE FUEL COST ADJUSTMENT CLAUSE

FUEL IDENTIFIED PORTION (A/C: 151 FUEL BASIS)

February 2014 ACTUAL

<u>SOURCES OF ENERGY</u>	<u>MWH</u>	<u>AMOUNT</u> (\$)	<u>\$ / MWH</u>
1. NET GENERATION:			
Big Sandy	580,585	17,147,648	29.535
Mitchell	301,325	9,304,481	30.879
Rockport	189,986	4,998,482	26.310
TOTAL	1,071,896	31,450,611	29.341
2. OTHER PURCHASES (CASH SETTLED):			
Third Party Power Purchase	57,851	3,210,163	55.490
TOTAL	57,851	3,210,163	55.490
3. TOTAL SOURCES (1+2)	1,129,747	34,660,774	30.680
<u>DISPOSITION OF ENERGY</u>			
4. OFF SYSTEM ALLOCATION OF SOURCES:			
Big Sandy	303,477	8,131,636	26.795
Mitchell	37,886	943,929	24.915
Rockport	87,928	2,063,022	23.463
Third Party Power Purchase	57,174	3,162,603	55.315
TOTAL	486,465	14,301,190	29.398
5. FUEL IDENTIFIED FOR NER (3-4)	643,282	20,359,584	31.650
6. TOTAL (4+5)	1,129,747	34,660,774	30.680
A. FUEL IDENTIFIED FOR NER (LINE 5 ABOVE)	643,282	20,359,584	31.650
B. NON-MONETARY COMPANY RECEIPTS AND DELIVERIES	0	0	0.000
C. FUEL IDENTIFIED FOR NER (LINES A+B)	643,282	20,359,584	31.650
D. OUT-OF-PERIOD ADJUSTMENT - OSS Adj for PJM Load Recon	(4,004)	(96,416)	24.079
E. OUT-OF-PERIOD ADJUSTMENT - Pool Purch for PJM Load Recon	4,004	96,416	24.079
F. CONVENTIONAL HYDRO	0	0	0.000
G. TOTAL SUPPLY FOR NET ENERGY REQUIREMENT (NER)	643,282	20,359,584	31.650

KENTUCKY POWER COMPANY

SOURCES AND DISPOSITION OF ENERGY FOR
FERC TYPE FUEL COST ADJUSTMENT CLAUSE

FUEL IDENTIFIED PORTION (A/C 151 FUEL BASIS)

March 2014 ACTUAL

<u>SOURCES OF ENERGY</u>	<u>MWH</u>	<u>AMOUNT</u> (\$)	<u>\$ / MWH</u>
1. NET GENERATION:			
Big Sandy	295,855	9,283,759	31.379
Mitchell	430,697	11,870,584	27.561
Rockport	282,429	6,273,177	22.212
TOTAL	1,008,981	27,427,520	27.183
2. OTHER PURCHASES (CASH SETTLED):			
Third Party Power Purchase	42,406	2,740,092	64.616
TOTAL	42,406	2,740,092	64.616
3. TOTAL SOURCES (1+2)	1,051,387	30,167,612	28.693
<u>DISPOSITION OF ENERGY</u>			
4. OFF SYSTEM ALLOCATION OF SOURCES:			
Big Sandy	143,704	3,767,733	26.219
Mitchell	153,627	3,699,578	24.082
Rockport	99,282	2,205,001	22.209
Third Party Power Purchase	39,260	2,524,811	64.310
TOTAL	435,873	12,197,123	27.983
5. FUEL IDENTIFIED FOR NER (3-4)	615,514	17,970,489	29.196
6. TOTAL (4+5)	1,051,387	30,167,612	28.693
A. FUEL IDENTIFIED FOR NER (LINE 5 ABOVE)	615,514	17,970,489	29.196
B. NON-MONETARY COMPANY RECEIPTS AND DELIVERIES	0	0	0.000
C. FUEL IDENTIFIED FOR NER (LINES A+B)	615,514	17,970,489	29.196
D. OUT-OF-PERIOD ADJUSTMENT - Spot Market Energy for PJM Load Recon	(4,918)	(486,123)	98.854
E. OUT-OF-PERIOD ADJUSTMENT	0	0	0.000
F. CONVENTIONAL HYDRO	0	0	0.000
G. TOTAL SUPPLY FOR NET ENERGY REQUIREMENT (NER)	610,596	17,484,367	28.635

ATTACHMENT B

Electric Sales Detail

Kentucky Power Company

Periods Last Five Years

	2009 Y	2010 Y	2011 Y	2012 Y	2013 Y
Date Ended	12/31/2009	12/31/2010	12/31/2011	12/31/2012	12/31/2013
Revenues (\$000)					
Residential Electric Revenue, Total	192,263	225,938	226,169	205,799	215,885
Commercial Electric Revenue, Total	115,966	129,946	135,517	125,717	128,311
Industrial Electric Revenue, Total	178,453	183,743	195,864	167,975	166,445
Public St & Hghwy, Oth Auth, Rails Rev	1,316	1,452	1,619	1,546	1,560
Total Retail Electric Revenue	487,998	541,079	559,169	501,037	512,201
Electric Sales for Resale	149,552	151,262	155,806	100,941	122,419
Total Sales of Electricity Revenue	637,549	692,341	714,976	601,978	634,620
Less Prov for Rate Refund Revenue	0	0	0	1,635	(478)
Net Sales of Electricity Revenue	637,549	692,341	714,976	600,343	635,098
Total Other Operating Revenue	15,751	16,871	26,026	31,113	31,493
Total Electric Operating Revenue	653,300	709,212	741,001	631,455	666,591
Electricity (MWh)					
Residential Electric Volume, Total	2,425,612	2,613,510	2,342,021	2,240,727	2,311,805
Commercial Electric Volume, Total	1,426,264	1,468,960	1,380,707	1,349,653	1,345,467
Industrial Electric Volume, Total	3,206,312	3,255,731	3,249,891	3,059,752	2,869,662
Public St & Hghwy, Oth Auth, Rails Vol, Total	10,268	10,328	10,544	10,524	10,587
InterDept Sales Vol, Total	0	0	0	0	0
Total Retail Electric Volume, Total	7,068,456	7,348,529	6,983,163	6,660,656	6,537,521
Sales for Resale Volume	3,939,203	3,854,136	4,152,046	2,936,231	3,396,006
Total Sales of Electricity Volume (MWh)	11,007,659	11,202,665	11,135,209	9,596,887	9,933,527
Customers					
Residential Electric Customers, Total	143,628	142,971	141,860	140,929	140,164
Commercial Electric Customers, Total	29,555	29,791	29,964	30,059	30,265
Industrial Electric Customers, Total	1,438	1,426	1,406	1,368	1,324
Public St & Hghwy, Oth Auth, Rails Customers, Total	373	391	411	401	385
Interdepartmental Sales Customers	0	0	0	0	0
Total Retail Electric Customers, Total	174,994	174,579	173,641	172,757	172,138
Sales for Resale Customers	104	103	115	102	82
Total Sales of Electricity Customers	175,098	174,682	173,756	172,859	172,220
Prices (cents/kWh)					
Residential Electric Price	7.93	8.64	9.66	9.18	9.34
Commercial Electric Price	8.13	8.85	9.82	9.31	9.54
Industrial Electric Price	5.57	5.64	6.03	5.49	5.80
Avg Price Charged to Ultimate Customers	6.90	7.36	8.01	7.52	7.83
Avg Price for Resale Customers	3.80	3.92	3.75	3.44	3.60
Avg Price Total Sales of Elec	5.79	6.18	6.42	6.27	6.39