COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC EXAMINATION BY THE	)	
PUBLIC SERVICE COMMISSION OF THE	)	
ENVIRONMENTAL SURCHARGE MECHANISM	)	
OF LOUISVILLE GAS AND ELECTRIC	)	**CASE NO. 2026-00178**
COMPANY FOR THE SIX-MONTH BILLING	)	
PERIOD ENDING APRIL 30, 2026	)	

DIRECT TESTIMONY OF

ANDREA M. FACKLER
MANAGER, REVENUE REQUIREMENT/COST OF SERVICE
LG&E AND KU SERVICES COMPANY

FILED: AUGUST 24, 2026

Q. Please state your name, title, and business address.

A. My name is Andrea M. Fackler. I am the Manager, Revenue Requirement/Cost of Service for Louisville Gas and Electric Company ("LG&E" or "Company") and an employee of LG&E and KU Services Company, which provides services to LG&E. My business address is 2701 Eastpoint Parkway, Louisville, Kentucky, 40223. A complete statement of my education and work experience is attached to this testimony as Appendix A.

Q. Have you previously testified before this Commission?

A. Yes. I have previously submitted testimony and sponsored data responses to the Kentucky Public Service Commission ("Commission") in the Companies' past six-month and two-year Environmental Cost Recovery ("ECR") Surcharge reviews[1]. I have also previously submitted testimony in the Company's 2020 ECR Compliance Plan proceeding[2].

Q. What is the purpose of this proceeding?

A. The purpose of this proceeding is to review the past operation of LG&E's ECR Surcharge during the six-month billing period ending April 30, 2026 ("Review Period") and determine whether the surcharge amounts collected during the period are just and reasonable.

Q. What is the purpose of your testimony?

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[1] *See, e.g., Electronic Examination by the Public Service Commission of the Environmental Surcharge Mechanism of Louisville Gas and Electric Company for the Six-Month Billing Period Ending October 31, 2025*, Case No. 2026-00004, Direct Testimony of Andrea M. Fackler (March 6, 2026).

[2] *See, e.g., Electronic Application of Louisville Gas and Electric Company for Approval of an Amended Environmental Compliance Plan and a Revised Environmental Surcharge*, Case No. 2020-00061, Direct Testimony of Andrea M. Fackler (Mar. 31, 2020).

A. The purpose of my testimony is to summarize the operation of LG&E's ECR Surcharge during the Review Period, explain how the Environmental Surcharge Billing Factors were calculated during the Review Period, correct any operating expense or rate base data from previously filed ES Reports, reflect actual changes in the overall rate of return on capital, demonstrate that the amount collected during the period was just and reasonable, and present and discuss LG&E's proposed adjustment to the ECR Surcharge Revenue Requirement to reconcile past surcharges with actual costs recoverable and its impact on a residential customer. I also present LG&E's proposed revisions to its monthly Environmental Surcharge reporting forms ("ES Forms") and ECR tariff. Finally, my testimony will recommend an updated overall rate of return on capital to be used going forward for all ECR Compliance Plans in the ES Reports upon the Commission's Order in this proceeding.

Q. Are you sponsoring any exhibits?

A. Yes. I am sponsoring three exhibits attached to my testimony:

- **Exhibit AMF-1**: LG&E Proposed ECR Tariff Sheet - Redline
- **Exhibit AMF-2**: LG&E Current Monthly ES Form 1.10
- **Exhibit AMF-3**: LG&E Proposed Monthly ES Form 1.10

Q. Please summarize the operation of the ECR Surcharge for the billing period included in this review.

A. LG&E billed an ECR Surcharge to its customers from November 1, 2025 through April 30, 2026 to collect (or refund) any difference between its ECR Surcharge Revenue Requirement and the ECR Surcharge revenues collected through base rates during the applicable expense period. For purposes of the Commission's examination in this case, the monthly LG&E ECR Surcharge amounts are for the billing period from November 2025 to April 2026. In each month of the billing period under review in this proceeding, LG&E calculated the Environmental Surcharge Billing Factors in accordance with its ECR Surcharge Tariff and the requirements of the Commission's previous orders concerning LG&E's ECR Surcharge. The calculations were made in accordance with the Commission-approved monthly forms (hereinafter referred to as "ES Forms" for the approved templates or as "ES Report" for the monthly data filed with the Commission) and filed with the Commission ten days before the new monthly factors were billed by the Company.

Q. Please explain the distinction between billing period and expense period.

A. The expense period is the calendar month in which the Company incurs approved ECR Surcharge costs. The Company prepares monthly ES Reports on an expense month basis to file with the Commission. As previously discussed, the ECR Surcharge is determined in the monthly ES Report and billed (or refunded) to customers in the second month following the expense month. This is the billing period.

Q. **What costs were included in the calculation of the Environmental Surcharge Billing Factors for the billing period under review?**

A. The capital and operating costs included in the calculation of the Environmental Surcharge Billing Factors for the Review Period were the September 2025 through February 2026 expense period costs LG&E incurred in conjunction with its approved ECR Compliance Plans, as detailed in the attachment to the response to Question No. 2 of the Commission Staff's First Request for Information, incorporating all required revisions.

The monthly Environmental Surcharge Billing Factors applied during the billing period under review were calculated consistent with the Commission's Orders in LG&E's previous applications to assess or amend its ECR Surcharge mechanism and Compliance Plans, as well as, Orders issued in previous review cases. The monthly ES Reports filed with the Commission during this time reflect the various changes to the ES Forms ordered by the Commission from time to time.

Q. Please describe the most recently approved changes to LG&E's ECR Compliance Plans.

A. In Case No. 2020-00061, the Commission approved LG&E's 2020 ECR Compliance Plan that included two new projects and associated operation and maintenance costs. Pursuant to the Commission's September 29, 2020 Order approving LG&E's 2020 ECR Compliance Plan, LG&E began including the approved projects in the monthly ES Report for the September 2020 expense month with separate authorized rates of return utilized for the Pre-2020 and 2020 ECR Compliance Plans.

Additionally, in LG&E's most recent base rate proceeding, Case No. 2020-00350, the Commission approved the Company's proposed elimination of all Eligible Pollution Control capital costs and related O&M associated with Projects 22, 23, and 26-28 (from LG&E's 2009, 2011, and 2016 ECR Compliance Plans) from the ECR Surcharge mechanism effective July 1, 2021.

Q. Please describe the most recently approved changes to the operation of the ECR Surcharge mechanism that impacts this Review Period.

A. In Case No. 2023-00375, the Commission approved the continuation of a return on equity to be used in the monthly environmental surcharge filings of 9.35% for all ECR

Plans. The Commission also approved changes to the Company's cash working capital calculation on ES Form 2.40 removing net beneficial reuse revenues and expenses. Finally, the Commission approved the immediate inclusion of all beneficially reused coal combustion residual revenues and expenses on ES Form 2.60, streamlining the collection/return of beneficial reuse revenues/expenses for customers during the expense month in which they occur.

In Case No. 2025-00173, the Commission approved the continuation of a 9.35% return on equity to be used in the monthly ES Reports for all ECR Compliance Plans beginning with the November 2025 expense month.

Finally, the most recently approved changes impacting this Review Period occurred in the Company's most recent base rate proceeding, Case No 2025-00114. The Commission ordered a 9.675% return on equity for all ECR Compliance Plans which was implemented in the monthly ES Report for the January 2026 expense month.

Q. Is LG&E proposing any changes to its Environmental Cost Recovery Surcharge tariff?

A. Yes. In Case No. 2025-00045, the Commission approved changes to LG&E's sister utility KU's Environmental Cost Recovery tariff in paragraph 2 on Sheet 87.1 that reads "by the addition of Commission-approved Administrative Expenses[3]." For consistency between KU and LG&E tariffs, the Company is proposing to add this same language to LG&E tariffs. However, LG&E is not proposing that any costs be recovered through this line at this time. Exhibit AMF-1 provides the proposed redline changes.

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[3] *Electronic application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates* – Case No. 2025-00045; In its May 14, 2025 Order, the Commission incorporated Case No. 2025-00105 into Case No. 2025-00045.

Q. Is LG&E proposing any changes to the currently approved ES forms?

A. Yes. Similar to the proposed change to tariff sheet 87.1 mentioned above, the Commission approved changes to KU's ES Forms in Case No. 2025-00045[4]. As such, LG&E is proposing to add the Administrative Expenses line to LG&E's ES Form 1.10. This proposed change is strictly being made to align the layout of LG&E's ES Form 1.10 to KU's ES Form 1.10. As previously noted, no expenses will appear on this line without approval from the Commission. Exhibit AMF-1 and Exhibit AMF-2 reflect the current and proposed changes to ES Form 1.10.

Q. Are there any changes or adjustments in Operating Expenses from the previously filed expense months that LG&E is correcting in this review case?

A. No, the Company has not identified any adjustments in Operating Expenses for the period under review that have not already been corrected through the filing of the monthly ES Reports.

Q. Are there any changes or adjustments in Rate Base from the originally filed expense months the LG&E is correcting in this review case?

A. No, the Company has not identified any adjustments in rate base for the period under review that have not already been corrected through the filing of the monthly ES Reports.

Q. Are there any other changes necessary to the jurisdictional revenue requirement (E(m))?

[4] Id.

A. Yes, Adjustments to E(m) are necessary for compliance with the Commission's Order in Case No. 2000-00386 to reflect the actual changes in the overall rate of return on capital that is used in the determination of the return on environmental rate base.

Pursuant to the terms of the Settlement Agreement approving the 2011 ECR Plan, LG&E calculated the short- and long-term debt rates using average daily balances and daily interest rates in the calculation of the overall rate of return true-up adjustment for the Review Period. For the September 2025 through December 2025 expense months, the weighted average cost of capital was based on the average daily balances for short- and long-term debt as of December 31, 2025 and the 9.35% authorized return on equity for all approved ECR Compliance Plans. For the January 2026 and February 2026 expense months, the weighted average cost of capital was based on the average daily balances for short- and long-term debt as of February 28, 2026 and the 9.675% authorized return on equity for all approved ECR Compliance Plans[5]. The details of and support for the overall rate of return calculations used to true-up the return on environmental rate base are shown in the attachment to LG&E's response to Question No. 1 of the Commission Staff's First Request for Information.

Q. Are there any other corrections to information provided in the monthly ES Reports during the Review Period that LG&E is correcting in this review case?

A. No.

Q. Are the amounts collected through the ECR Surcharge just and reasonable?

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[5] *Electronic application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates and Approval of Certain Regulatory and Accounting Treatments* – Case No. 2025-00114; In its February 16, 2026 Order, the Commission ordered a 9.675% ROE for recovery on all capital riders.

A. Yes. The Company only includes costs in the ECR Surcharge that were incurred in conjunction with Commission-approved ECR Compliance Plans. Any information identified and corrected in a review case proceeding, such as the instant proceeding, or through the filing of revised ES Reports with the Commission are due to various checks and balances the Company has in place to ensure proper cost recovery through the ECR Surcharge.

Q. As a result of the operation of the ECR Surcharge during the billing period under review, is an adjustment to the ECR Surcharge Revenue Requirement necessary?

A. Yes. LG&E experienced an over-recovery of $79,561 for the Review Period. LG&E's attachment to the response to Question No. 2 of the Commission Staff's First Request for Information shows the calculation of the over-recovery. An adjustment to the ECR Surcharge Revenue Requirement is necessary to reconcile the over-recovery of past ECR Surcharge revenues for the Review Period with actual costs.

Q. Has LG&E identified the causes of the over-recovery during the billing period under review?

A. Yes. LG&E has identified the primary component that made up the over-recovery during the Review Period. The primary component is the use of 12-month average revenues to determine the billing factor. While the actual overall rates of return were mostly higher for the Review Period compared to the overall rates of return used in the monthly ES Reports, differences between actual revenues that the Environmental Surcharge Billing Factors are applied to and 12-month average revenues used to calculate the monthly billing factors also impact cost recovery. The details of the over-recovery during the Review Period are shown in the attachment to LG&E's response to Question No. 2 of the Commission Staff's First Request for Information.

Q. Please explain how the function of the ECR mechanism contributes to the recovery position in the billing period under review.

A. The use of 12-month average revenues to calculate the monthly billing factors and then applying those same billing factors to the actual monthly revenues will result in an over- or under-collection of ECR Surcharge revenues. The over- or under-collection will also depend on whether the billing factors were charges or credits. For illustrative purposes, the table below shows a comparison of the 12-month average revenues used in the monthly ES Reports to determine the Environmental Surcharge Billing Factors and the actual revenues to which the Environmental Surcharge Billing Factors were applied in the billing month during the Review Period.

Expense Month	12-Month Average Revenues	Billing Month	Actual Revenues Subject to ECR Billing Factors
September 2025	$88,328,643	November 2025	$69,120,218
October 2025	$88,367,572	December 2025	$88,127,692
November 2025	$88,593,990	January 2026	$92,303,642
December 2025	$88,923,391	February 2026	$101,732,641
January 2026	$88,641,805	March 2026	$84,636,571
February 2026	$89,944,800	April 2026	$80,742,039
*The 12-Month Average Revenues and the Actual Revenues Subject to ECR Billing Factors reflect revenues for Groups 1 and 2.			

Generally, if the billing factor is a charge: (1) an under-recovery will occur when actual revenues for the billing month are less than the 12-month average revenues used for the expense month and (2) an over-recovery will occur when actual revenues for the billing month are greater than the 12-month average revenues used for the expense month.

On the other hand, if the billing factor is a credit, the recovery position will generally follow the opposite result.

Q. What kind of adjustment is LG&E proposing in this case as a result of the operation of the ECR Surcharge during the billing period?

A. LG&E is proposing that the over-recovery be distributed over one month following the Commission's Order in this proceeding. Specifically, LG&E recommends that the Commission approve a decrease to the ECR Surcharge Revenue Requirement of $79,561 for one month beginning in the second full billing month following the Commission's Order in this proceeding. This method is consistent with the method of implementing previous over- or under-recovery positions in prior ECR Surcharge review cases.

Q. What is the bill impact on a residential customer for the proposed distribution of the over-recovery?

A. The inclusion of the distribution of the over-recovery position in the determination of the ECR Surcharge Billing Factor will decrease the billing factor by approximately 0.08% for one month. For a residential customer using an average of 934 kWh per month (based on 12-month ended February 2026 data), the impact of the adjusted ECR Surcharge Billing Factor would be a decrease of approximately $0.09 for the month (using rates and adjustment clause factors in effect for the August 2026 billing month). See the response and attachment to Commission Staff's First Request for Information Question No. 6.

Q. What rate of return is LG&E proposing to use for all ECR Compliance Plans upon the Commission's Order in this proceeding?

A. LG&E is recommending an overall rate of return on capital of 9.06 percent, including the currently approved 9.675 percent return on equity and adjusted capitalization, to be used to calculate the return on environmental rate base going forward in the monthly ES Reports. This rate of return is based on capitalization as of February 28, 2026, the Commission's February 16, 2026 Order in Case No. 2025-00114 authorizing a 9.675 percent return on equity for all capital riders, and the continued use of the federal corporate income tax rate implemented in accordance with the Tax Cuts and Jobs Act and the Kentucky state corporate income tax rate implemented in accordance with House Bill 487.

See the response and attachment to Commission Staff's First Request for Information Question No. 5.

Q. What is your recommendation to the Commission in this case?

A. LG&E makes the following recommendations to the Commission in this case:

a) The Commission should determine the ECR Surcharge amounts for the six-month billing period ending April 30, 2026 to be just and reasonable;

b) The Commission should approve the proposed decrease to the ECR Surcharge Revenue Requirement of $79,561 for one month beginning in the second full billing month following the Commission's Order in this proceeding;

c) The Commission should approve the proposed changes to the ECR tariff and ES Forms;

d) The Commission should approve the use of an overall rate of return on capital of 9.06 percent for all ECR Compliance Plans in the monthly ES Reports, using a return on equity of 9.675 percent, beginning in the second full billing month following the Commission's Order in this proceeding.

Q. Does this conclude your testimony?

A. Yes.

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Andrea M. Fackler**, being duly sworn, deposes and says that she is Manager - Revenue Requirement/Cost of Service for Louisville Gas and Electric Company, an employee of LG&E and KU Services Company, that she has personal knowledge of the matters set forth in the foregoing testimony, and that the answers contained therein are true and correct to the best of her information, knowledge, and belief.

Andrea M. Fackler

Andrea M. Fackler

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 24th day of August 2026.

Tammy J. Elzy
Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026

TAMMY J. ELZY
COMM EXPIRES 11/09/2026
NOTARY PUBLIC
ID # KYNP61560
STATE AT LARGE, KENTUCKY

APPENDIX A

Andrea M. Fackler, CPA, CGMA
Manager, Revenue Requirement/Cost of Service
LG&E and KU Services Company
2701 Eastpoint Parkway
Louisville, Kentucky 40223

Professional Experience

LG&E and KU Services Company

Manager, Revenue Requirement/Cost of Service	Nov 2019 – Present
Rate & Regulatory Analyst III & Senior	Jan 2016 – Nov 2019
Accounting Analyst III & Senior	Aug 2012 – Jan 2016
Accounting Analyst II & III	Jul 2010 – Aug 2012

Dean Dorton Ford, PSC

Supervisor in Accounting and Compliance Services	Jan 2007 – May 2010

Professional/Trade Memberships

American Institute of Certified Professional Accountants
Kentucky Society of Certified Public Accountants
Institute of Management Accountants

Education/Certifications/Training

Bachelor of Science in Accounting, University of Kentucky, Dec 2006
Bachelor of Business Administration, University of Kentucky, Dec 2006
Certified Public Accountant License, Feb 2009
Chartered Global Management Accountant Designation, Jul 2014
LG&E and KU Strategic Business Integration, 2017-2018 Cohort

Civic Activities

Parent Volunteer, Budget Committee, St. John Community Church, January 2021 – Present
Committee Member, Harmony Elementary PTA, August 2020 – Present
Committee Member, Members in Business and Industry, KSCPA, July 2017 – Present
President, PPL CARE Business Resource Group, January 2021 – January 2026
Troop Leader, Girl Scouts of Kentuckiana, September 2021 – September 2024
President-Elect, President, and Immediate Past President, LG&E and KU Young Energy Professionals Business Resource Group, 2015-2017

Louisville Gas and Electric Company

P.S.C. Electric No. 14, First Revision of Original Sheet No. 87.1
Canceling P.S.C. Electric No. 14, Original Sheet No. 87.1

Adjustment Clause **ECR**
Environmental Cost Recovery Surcharge

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DEFINITIONS (continued)

2. E(m) is multiplied by the Jurisdictional Allocation Factor. Jurisdictional E(m) is adjusted for any (Over)/Under collection or prior period adjustment, by the addition of Commission-approved Administrative Expenses, and by the subtraction of the Revenue Collected through Base Rates for the Current Expense month to arrive at Adjusted Net Jurisdictional E(m). Adjusted Net Jurisdictional E(m) is allocated to Group 1 and Group 2 on the basis of Revenue as a Percentage of Total Revenue for the twelve (12) months ending with the Current Month to arrive at Group 1 E(m) and Group 2 E(m). T T

3. The Group 1 R(m) is the average of total Group 1 monthly base revenue for the twelve (12) months ending with the current expense month. Base revenue includes customer, energy, and lighting charges for each rate schedule included in Group 1 to which this mechanism is applicable and automatic adjustment clause revenues for the Fuel Adjustment Clause, Off-System Sales Adjustment Clause, and the Demand-Side Management Cost Recovery Mechanism as applicable for each rate schedule in Group 1.

4. The Group 2 R(m) is the average of total Group 2 monthly base non-fuel revenue for the twelve (12) months ending with the current expense month. Base non-fuel revenue includes customer, non-fuel energy, and demand charges for each rate schedule included in Group 2 to which this mechanism is applicable and automatic adjustment clause revenues for the Demand-Side Management Cost Recovery Mechanism as applicable for each rate schedule in Group 2. Non-fuel energy is equal to the tariff energy rate for each rate schedule included in Group 2 less the base fuel factor as defined on Sheet No. 85.1, Paragraph 6.

5. Current expense month (m) shall be the second month preceding the month in which the Environmental Surcharge is billed.

Deleted: March 6
Deleted: February 16
Deleted: 5-00114
Deleted: February 16, 2026

DATE OF ISSUE: August 24, 2026

DATE EFFECTIVE: With Service Rendered
On and After XXXX, 2026

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Louisville, Kentucky

Issued by Authority of an Order of the
Public Service Commission in Case No.
2026-00178 dated XXXX

ES FORM 1.10

LOUISVILLE GAS AND ELECTRIC COMPANY
ENVIRONMENTAL SURCHARGE REPORT
Calculation of Total E(m) and Group Surcharge Billing Factors

For the Expense Month of

Calculation of E(m)

E(m) = [(RB / 12) (ROR+(ROR -DR)(TR/(1-TR)))] + OE - AS + BR, where

RB	=	Environmental Compliance Rate Base
ROR	=	Rate of Return on the Environmental Compliance Rate Base
DR	=	Debt Rate (both short-term and long-term debt)
TR	=	Composite Federal & State Income Tax Rate
OE	=	Pollution Control Operating Expenses
AS	=	Total Proceeds from Allowance Sales
BR	=	Net Monthly Beneficial Reuse Operations Expenses/(Revenues)

				All Environmental Compliance Plans
(1)	RB		=	
(2)	RB / 12		=	
(3)	(ROR + (ROR - DR) (TR / (1 - TR)))		=	
(4)	OE		=	
(5)	AS		=	
(6)	BR		=	
(7)	E(m)	(2) x (3) + (4) - (5) + (6)	=	

Calculation of Adjusted Net Jurisdictional E(m)

(8)	Jurisdictional Allocation Ratio for Expense Month -- ES Form 3.10	=	
(9)	Jurisdictional E(m) = Total E(m) x Jurisdictional Allocation Ratio [(7) x (8)]	=	
(10)	Adjustment for (Over)/Under-collection pursuant to Case No.	=	
(11)	Prior Period Adjustment (if necessary)	=	
(12)	Revenue Collected through Base Rates	=	
(13)	Adjusted Net Jurisdictional E(m) [(9) + (10) + (11) - (12)]	=	

Calculation of Group Environmental Surcharge Billing Factors

			GROUP 1 (Total Revenue)	**GROUP 2 (Net Revenue)**
(14)	Revenue as a Percentage of 12-month Total Revenue ending with the Current Month -- ES Form 3.00	=		
(15)	Group E(m) [(13) x (14)]	=		
(16)	Group R(m) = Average Monthly Group Revenue for the 12 Months Ending with the Current Expense Month -- ES Form 3.00	=		
(17)	Group Environmental Surcharge Billing Factors [(15) ÷ (16)]	=		

ES FORM 1.10

LOUISVILLE GAS AND ELECTRIC COMPANY
ENVIRONMENTAL SURCHARGE REPORT

Calculation of Total E(m) and
Group Surcharge Billing Factors

For the Expense Month of

Calculation of E(m)

E(m) = [(RB / 12) (ROR+(ROR -DR)(TR/(1-TR)))] + OE - AS + BR, where

RB	=	Environmental Compliance Rate Base
ROR	=	Rate of Return on the Environmental Compliance Rate Base
DR	=	Debt Rate (both short-term and long-term debt)
TR	=	Composite Federal & State Income Tax Rate
OE	=	Pollution Control Operating Expenses
AS	=	Total Proceeds from Allowance Sales
BR	=	Net Monthly Beneficial Reuse Operations Expenses/(Revenues)

				All Environmental Compliance Plans
(1)	RB		=	
(2)	RB / 12		=	
(3)	(ROR + (ROR - DR) (TR / (1 - TR)))		=	
(4)	OE		=	
(5)	AS		=	
(6)	BR		=	
(7)	E(m)	(2) x (3) + (4) - (5) + (6)	=	

Calculation of Adjusted Net Jurisdictional E(m)

(8)	Jurisdictional Allocation Ratio for Expense Month -- ES Form 3.10	=	
(9)	Jurisdictional E(m) = Total E(m) x Jurisdictional Allocation Ratio [(7) x (8)]	=	
(10)	Adjustment for (Over)/Under-collection pursuant to Case No.	=	
(11)	Prior Period Adjustment (if necessary)	=	
(12)	Administrative Expenses	=	
(13)	Revenue Collected through Base Rates	=	
(14)	Adjusted Net Jurisdictional E(m) [(9) + (10) + (11) + (12) - (13)]	=	

Calculation of Group Environmental Surcharge Billing Factors

			GROUP 1 (Total Revenue)	**GROUP 2 (Net Revenue)**
(15)	Revenue as a Percentage of 12-month Total Revenue ending with the Current Month -- ES Form 3.00	=		
(16)	Group E(m) [(14) x (15)]	=		
(17)	Group R(m) = Average Monthly Group Revenue for the 12 Months Ending with the Current Expense Month -- ES Form 3.00	=		
(18)	Group Environmental Surcharge Billing Factors [(16) ÷ (17)]	=		