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June 29, 2022

VIA E-FILE

Mr. Andrew S. Johnston
Executive Secretary
Public Service Commission of Maryland
William Donald Schaefer Tower
6 St. Paul Street, 16th Floor
Baltimore, MD 21202

**RE: The Potomac Edison Company
Retail Tariff Filing for Cogeneration PURPA Surcharge
Case No. 8797**

Dear Secretary Johnston:

Due to continued over-collections from the Cogeneration PURPA Project Surcharge (“Surcharge”), the Potomac Edison Company (“PE” or “Company”) is filing herewith three options for the Commission’s consideration to reduce the Surcharge effective August 1, 2022 through December 31, 2022.¹

Surcharge Background

Pursuant to Paragraph 10 of the September 23, 1999 Settlement Agreement approved by the Commission in Order No. 75851 in Case No. 8797, and affirmed in Supplemental Order No. 76009 in that case, part of PE’s overall electric restructuring is that there is a Surcharge set equal to the AES Warrior Run contract payments, less revenues received from the sale of the Warrior Run generation output including, but not limited to, all energy, capacity and any ancillary services, into the wholesale market through a competitive bidding process. On November 28, 2007 in Order No. 81725, the Commission approved amended language to revise the Settlement Agreement language. As authorized in Order No. 81725, beginning January 2008 the energy output of the Warrior Run generating facility is to be offered directly into the day-ahead PJM wholesale market, and capacity of the facility is to be offered into the PJM forward capacity market.

Recognizing the variability of PJM energy market prices as opposed to wholesale fixed price sales contracts, Commission Order No. 81725 also amended the Settlement Agreement by adding the following sentence.

¹ In 2012 and 2016, the Commission approved mid-year changes to the Surcharge due to under-collections. See Commission letter orders dated June 20, 2012 (Maillog #139761) and July 20, 2016 (Maillog #194192).

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“In order to true-up the results of the sale of the Warrior Run output, the Warrior Run surcharge may be revised twice annually.”

The Surcharge options filed herewith are based on projected costs and revenues for August through December 2022 under the aforementioned new market sales paradigm. The methodology used to derive the Surcharge is identical to the methodology previously approved by the Commission and is detailed below.

The Warrior Run cost is projected for the period of August through December 2022 based upon the scheduled megawatt-hour generation output for the same period. This cost is reduced by the amount of revenue forecasted from the sale of the Warrior Run generation output directly into the PJM wholesale market, which includes the reactive power revenue requirement. Expenses incurred for dispatch are paid from the proceeds of the sale of the Warrior Run generation output.

The cost remaining, net of prior period over or under-collections, is grossed up for Maryland State Gross Receipts Tax and the Maryland PSC Assessment Factor to produce a total revenue requirement.

Over-Collection

In its Surcharge filing dated November 23, 2021, the Company forecasted a \$19 million over-collection by year-end 2021 and designed Surcharge rates to return the over-collection to customers during 2022.² However, during the period of January through May 2022, the wholesale energy market was higher than the forecast used to set the current Surcharge rates. Consequently, the Surcharge over-recovery has increased to approximately \$28 million as of the end of May 2022.

PE has subsequently updated its forecast and, through this filing, proposes three options to decrease the Surcharge rates effective August 1, 2022 through December 31, 2022.

Options

Option 1: Forecast the Surcharge over-recovery balance through July 2022 (i.e., immediately prior to new Surcharge rates becoming effective) and design new Surcharge rates to return the entire *forecasted* over-recovery balance during August-December 2022. This results in a Surcharge credit of approximately \$32 million, with no amounts left over by year end to mitigate a likely Surcharge increase in 2023.

Option 2: Eliminate the uncertainty of forecasted over-collections during June-July 2022 and, instead, design Surcharge rates during August-December 2022 to return the known and *actual* over-recovery balance as of May 2022. This results in a Surcharge credit of approximately \$21 million, with \$11 million forecasted to remain by year end to help mitigate a likely Surcharge increase in 2023.

² The November 23, 2021 filing was approved by Commission letter order dated December 22, 2021 (Maillog #237946)

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Option 3: Set the Surcharge to zero during August-December 2022. This results in approximately \$32 million left over by year end to mitigate a likely surcharge increase in 2023.

Listed below is a summary of the revenue requirements of Options 1 through 3.

Aug-Dec 2022 Updated Forecast							
	Warrior Run PURPA Payments	PJM Market Proceeds	Net (Payments less PJM Market)	Over- Collection to return Aug- Dec 2022	Surcharge (Net plus Over- Collection)	Surcharge after GRT & Assess. Fee	Carryover to mitigate 2023 Surcharge
Option 1	\$ 62,944,270	\$ 55,110,406	\$ 7,833,864	\$ (39,199,817)	\$ (31,365,953)	\$ (32,096,895)	\$ -
Option 2	\$ 62,944,270	\$ 55,110,406	\$ 7,833,864	\$ (28,175,286)	\$ (20,341,422)	\$ (20,815,452)	\$ (11,281,443)
Option 3	\$ 62,944,270	\$ 55,110,406	\$ 7,833,864	\$ -	\$ -	\$ -	\$ (32,096,895)

Listed below is a summary of the Surcharge rates for Options 1 through 3.

Rate Schedule	Option 1	Option 2	Option 3	
R (residential)	\$ (0.01275)	\$ (0.00831)	\$ -	/kWh
C, G, Hag & Fred	\$ (0.01302)	\$ (0.00851)	\$ -	/kWh
C-A, CSH	\$ (0.01764)	\$ (0.01156)	\$ -	/kWh
PH, AGS				
demand	\$ (2.29)	\$ (1.48)	\$ -	/kW
energy	\$ (0.00500)	\$ (0.00324)	\$ -	/kWh
PP				
demand	\$ (1.017)	\$ (0.596)	\$ -	/kW
energy	\$ (0.00220)	\$ (0.00129)	\$ -	/kWh
Street Lighting	\$ (0.02810)	\$ (0.01900)	\$ -	/kWh

For an average residential customer that consumes 1,000 kWh per month, Option 1 would equate to a monthly credit of -\$12.75, Option 2 would equate to a monthly credit of -\$8.31, and Option 3 would result in no credit or charge associated with the Surcharge. For purposes of comparison, an average residential customer that consumes 1,000 kWh per month is currently paying a monthly charge of \$7.23 under the Surcharge.

Recommendation

To develop a recommended option, the Company also updated its 2023 forecast of Warrior Run contract payments and PJM wholesale market proceeds. The updated projection for 2023 is approximately \$136 million for Warrior Run contract payments and \$89 million for PJM wholesale market proceeds. The net result is \$47 million, which means that assuming there is no prior period over or under-collection, the Surcharge would need to collect approximately \$47 million during 2023.³

³ This amount excludes the relatively small gross-up factor for Maryland State Gross Receipts Tax and the Maryland PSC

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The Company is concerned that Option 1 has the potential to cause rate shock to its customers, since the \$32 million credit during the remainder of 2022 could change to a \$47 million charge during 2023.

Therefore, from a rate gradualism standpoint, the Company recommends Option 3 since it: (1) sets the Surcharge to zero during August-December 2022, providing customers immediate relief from the Surcharge; and (2) provides a large, forecasted carryover balance of \$32 million to significantly mitigate the impact of the 2023 Surcharge. However, since the Company's recommendation is due solely from a rate gradualism standpoint, it does not object to either Options 1 or 2 if the Commission considers either as a preferable option.⁴ Regardless of the Option exercised by the Commission, the over-collection has, and will continue to, accrue interest to the customer's benefit at the current prime rate in accordance with the aforementioned Settlement Agreement.⁵

Upon issuance of a Commission order establishing the selected Option, the Company will submit a tariff compliance filing that contains the Commission-approved rates for the Cogeneration PURPA Project Surcharge effective August 1, 2022 through December 31, 2022. Further, consistent with past practice, the Company will submit its annual update to the Cogeneration PURPA Project Surcharge in November 2022 for new rates effective January 1, 2023.

Calculations supporting the development of the Surcharge options are shown in the accompanying schedules. The rate design was developed in accordance with Paragraph 28 of the Settlement Agreement. The allocation factors are the same as those used to develop the current Surcharge rates effective January 2022.

Should there be questions concerning the filing, please contact me.

Very truly yours,



Jeffrey P. Trout
Senior Corporate Counsel

JPT/dml
Enclosures
cc: Lloyd Spivak, MD PSC Staff
William Fields, OPC

Assessment Factor.

⁴ Should the Commission prefer Options 1 or 2, the Company has a slight preference to Option 2 since it is forecasted to provide some over-collections in 2022 to help mitigate the impact of the 2023 Surcharge.

⁵ The current prime rate is 4.75%.

**Summary Calculation of
Total Revenue Requirement
For the Period August 2022 - December 2022**

(a) Total Projected Warrior Run Cost	\$ 62,944,269.99
(b) Projected Revenue from Market Sales	\$ 54,853,490.83
(c) Projected Reactive Revenue	\$ 298,581.67
(d) Projected Warrior Run Consultant Fee and Dispatch Charges	\$ 41,666.67
<hr/>	
(e) Projected Cost to be Collected from MD Retail Customers = (a) - (b) - (c) + (d)	\$ 7,833,864.16
(f) Estimated (Over)/Under Recovery as of July 31, 2022	\$ (38,156,349.31)
(g) Interest Accrued on Average Remaining Balance at Prime through July 31, 2022	\$ (597,256.26)
(h) Interest Accrued on Average Remaining Balance at Prime through December 31, 2022	\$ (383,499.22)
(i) Federal Income Tax Effect on 2022 Interest	\$ (62,711.91)
(j) Maryland Gross Receipts Tax & MD PSC Assessment Fee	\$ (730,942.59)
<hr/>	
(k) Revenue Requirement = (e) + (f) + (g) + (h) + (i) + (j)	\$ (32,096,895.13)

Maryland Warrior Run PURPA Project
Calculation of Projected Cost of
Warrior Run Output net of Revenue Received
from Sale of Output on Wholesale Market
For the Period August 2022 - December 2022

	<u>Aug. 2022</u>	<u>Sept 2022</u>	<u>Oct 2022</u>	<u>Nov 2022</u>	<u>Dec 2022</u>	<u>Totals</u>
Period Hours	744	720	744	720	744	
Scheduled Output MWH	133,920	129,600	133,920	129,600	133,920	660,960
Total Warrior Run Cost	\$ 12,939,494.08	\$ 12,735,008.78	\$ 13,742,286.86	\$ 11,817,439.71	\$ 11,710,040.56	\$ 62,944,269.99
Projected Revenue from Market Sales	\$ 12,066,487.20	\$ 10,092,184.19	\$ 10,709,844.01	\$ 10,720,215.21	\$ 11,264,760.22	\$ 54,853,490.83
Projected Reactive Revenue	\$ 59,716.33	\$ 59,716.33	\$ 59,716.33	\$ 59,716.33	\$ 59,716.35	\$ 298,581.67
Projected Dispatch & Consultant Charges	\$ 8,333.33	\$ 8,333.33	\$ 8,333.33	\$ 8,333.33	\$ 8,333.35	\$ 41,666.67
Projected Cost Remaining for MD Retail Customers	\$ 821,623.88	\$ 2,591,441.59	\$ 2,981,059.85	\$ 1,045,841.50	\$ 393,897.34	\$ 7,833,864.16
				Projected Net Cost for twelve months ended December 31, 2022	\$	7,833,864.16
				Estimated (Over)/Under Recovery as of July 31, 2022	\$	(38,156,349.31)
				Interest Accrued on Average Remaining Balance at Prime through July 31, 2022	\$	(597,256.26)
				Interest Accrued on Average Remaining Balance at Prime through December 31, 2022	\$	(383,499.22)
				Federal Income Tax Effect on 2022 Interest	\$	(62,711.91)
				Maryland Gross Receipts Tax & MD PSC Assessment Fee	\$	(730,942.59)
				Revenue Requirement	\$	(32,096,895.13)

Maryland Warrior Run PURPA Project
2022 Interest Accrual on (Over)/Under Recovery

	<u>Warrior Run Surcharge</u> <u>Balance at Month End</u>	<u>Monthly</u> <u>Collected Amount</u>	<u>Interest Calculated</u> <u>at Current Prime Rate</u> ¹	<u>Cumulative Interest</u> <u>Balance</u>
July 2022	\$ (38,753,605.57)			
Aug 2022	\$ (31,002,884.46)	\$ 7,750,721.11	\$ (138,059.72)	\$ (138,059.72)
Sept 2022	\$ (23,252,163.34)	\$ 7,750,721.11	\$ (107,379.78)	\$ (245,439.50)
Oct 2022	\$ (15,501,442.23)	\$ 7,750,721.11	\$ (76,699.84)	\$ (322,139.34)
Nov 2022	\$ (7,750,721.11)	\$ 7,750,721.11	\$ (46,019.91)	\$ (368,159.25)
Dec 2022	\$ 0.00	\$ 7,750,721.11	\$ (15,339.97)	\$ (383,499.22)

¹ Current Prime Rate as stated in the Wall Street Journal is 4.75%

Maryland Warrior Run PURPA Payment Reconciliation

2022	506934 AES Warrior Run Cost Energy & Demand	447609 Revenue from sale of Warrior Run	456008 Revenue from Reactive	447001 PJM RPM Auction/ RPM Auction Cr	557115 PJM	Retail Revenue Tariff Surcharge without GRT & PSC Assessment	557501 Entry Amount	254200 / 182455 (Over)/Under Balance	Prime Rate	Monthly Rate	431000 Monthly Interest	Cumulative Interest
January	\$ 11,771,296.84	\$ 6,698,189.44	\$ 59,716.33	\$ 749,983.71	\$ 4,252.38	\$ 4,821,257.53	\$ 553,597.79	\$ (20,326,264.98)	3.25%	0.2708%	\$ (55,799.96)	\$ (55,799.96)
February	\$ 8,163,672.67	\$ 5,594,871.76	\$ 59,716.33	\$ 677,404.52	\$ 5,399.06	\$ 4,195,736.05	\$ 2,358,656.93	\$ (23,294,319.66)	3.25%	0.2708%	\$ (59,894.77)	\$ (115,694.73)
March	\$ 9,460,711.42	\$ 4,505,215.76	\$ 59,716.33	\$ 749,983.62	\$ 6,638.14	\$ 3,810,923.20	\$ (341,510.65)	\$ (23,012,703.78)	3.50%	0.2917%	\$ (67,618.42)	\$ (183,313.15)
April	\$ 11,467,306.99	\$ 7,642,121.58	\$ 59,716.33	\$ 725,795.42	\$ 8,665.95	\$ 3,415,530.13	\$ 367,190.52	\$ (23,447,512.72)	3.50%	0.2917%	\$ (67,853.09)	\$ (251,166.24)
May	\$ 1,810,217.44	\$ 1,706,122.95	\$ 59,716.33	\$ 750,014.58	\$ 5,209.44	\$ 3,428,016.93	\$ 4,128,443.91	\$ (27,643,809.72)	4.00%	0.3333%	\$ (85,265.29)	\$ (336,431.53)
June (Est)	\$ 5,465,454.06	\$ 4,814,825.81	\$ 59,716.33	\$ 750,014.58	\$ 5,209.44	\$ 4,779,142.93	\$ 4,933,036.15	\$ (32,662,111.16)	4.75%	0.3958%	\$ (119,524.22)	\$ (455,955.75)
July (Est)	\$ 12,078,516.64	\$ 12,760,889.02	\$ 59,716.33	\$ 750,014.58	\$ 5,209.44	\$ 4,343,775.84	\$ 5,830,669.68	\$ (38,612,305.06)	4.75%	0.3958%	\$ (141,300.51)	\$ (597,256.26)
								\$ (38,753,605.57)				
								\$ (27,729,075.01)				

Total Estimated Balance at July 31, 2022

Total Actual Balance at May 31, 2022

Project Name AES WARRIOR RUN

NSOC Capability: 180
 EFOR As calculated in PCI dispatch
 Dispatch: 100%

Period	Hours	Planned Outage Days	Scheduled Output MWh	Energy Output MWh	Capacity Rate \$/MWh	Energy Rate \$/MWh	Capacity Payment \$	Energy Payment \$	Demand Dispatch Payment \$	Total Payment \$	Projected Revenue from Market Sales \$
Aug 2022	744	0.0	133,920	125,349	45.05	54.76	6,033,096.00	6,864,070.11	42,327.97	12,939,494.08	12,066,487.20
Sept 2022	720	0.0	129,600	121,306	45.05	56.43	5,838,480.00	6,845,573.01	50,955.77	12,735,008.78	10,092,184.19
Oct 2022	744	0.0	133,920	125,349	45.05	60.90	6,033,096.00	7,633,571.98	75,618.88	13,742,286.86	10,709,844.01
Nov 2022	720	0.0	129,600	121,306	45.05	48.95	5,838,480.00	5,937,418.52	41,541.19	11,817,439.71	10,720,215.21
Dec 2022	744	0.0	133,920	125,349	45.05	45.08	6,033,096.00	5,650,565.27	26,379.30	11,710,040.57	11,264,760.22
Total			660,960				\$ 29,776,248.00	\$ 32,931,198.89	\$ 236,823.10	\$ 62,944,269.99	\$ 54,853,490.83

2022 Dispatch & Consultant Fee \$ 41,666.67
 Average/month \$ 8,333.33

2022 Reactive Power \$ 298,581.67
 Average/month \$ 59,716.33

THE POTOMAC EDISON COMPANY - MARYLAND
 OPTION 1
 Calculation of August through December 2022 Warrior Run PURPA Surcharge

Rate Schedule (a)	August through December 2022 Warrior Run Contract Payments			Over Recovery Allocation (g)	Aug-Dec 2022 Market Proceeds Allocation (h)	Net Warrior Run PURPA Allocation (pre-tax) (i) = (f)+(g)+(h)	Net Warrior Run PURPA Allocation (post-tax) (j) = (i) / 0.977227	Aug through Dec 2022 Forecast kWh (k)	Aug through Dec 2022 Forecast kW (l)	Aug through Dec 2022 Warrior Run PURPA Surcharge \$/kWh (m)	Resultant Warrior Run PURPA Collection (o)
	Capacity Allocation Ratio (b)	Capacity Allocation (c)	Energy Allocation Ratio (d)								
R	0.534846	\$ 16,052,375	0.494581	\$ 16,287,160	\$ 32,339,535	\$ (20,965,870)	\$ (28,314,649)	1,359,344,956	--	\$ (0.01275)	\$ (17,335,771)
C	0.016888		0.013180					30,370,494	--	\$ (0.01302)	\$ (395,435)
G	0.130291		0.117018					337,691,738	--	\$ (0.01302)	\$ (4,396,873)
Hag & Fred	0.000118		0.000182					491,050	--	\$ (0.01302)	\$ (6,394)
	0.147296	\$ 4,420,813	0.130379	\$ 4,293,549	\$ 8,714,362	\$ (5,773,986)	\$ (7,629,797)	368,553,282	--		\$ (4,798,702)
C-A	0.002424		0.002034					4,348,580	--	\$ (0.01764)	\$ (76,696)
CSH	0.001691		0.001470					3,285,405	--	\$ (0.01764)	\$ (57,945)
	0.004115	\$ 123,505	0.003505	\$ 115,412	\$ 238,917	\$ (161,309)	\$ (209,182)	7,633,985	--		\$ (134,640)
PH, AGS	0.251778	\$ 7,586,622	0.257378	\$ 8,475,763	\$ 16,032,385	\$ (9,869,640)	\$ (14,037,040)	751,460,706	1,879,044	\$ (0.00500)	\$ (8,057,795)
PP	0.051441	\$ 1,543,912	0.110504	\$ 3,639,040	\$ 5,182,952	\$ (2,016,490)	\$ (4,537,897)	324,436,291	678,304	\$ (0.00220)	\$ (1,403,395)
Lighting	0.010524	\$ 315,844	0.003652	\$ 120,275	\$ 436,119	\$ (412,522)	\$ (381,841)	13,046,618	--	\$ (0.02810)	\$ (366,592)
TOTALS	1.000000	\$ 30,013,071	1.000000	\$ 32,931,199	\$ 62,944,270	\$ (39,199,817)	\$ (55,110,406)	2,824,475,838	2,557,348		\$ (32,096,895)

- Notes:
- 1) Allocation ratios in columns (b) and (d) from 2020 billing determinants
 - 2) Column (c) calculated as the total Capacity Allocation of \$30,013,071 multiplied by the Capacity Allocation Ratio in column (b)
 - 3) Column (e) calculated as the total Energy Allocation of \$32,931,199 multiplied by the Energy Allocation Ratio in column (d)
 - 4) Column (g) calculated as the total Over Recovery of \$-39,199,817 multiplied by the Capacity Allocation Ratio in column (b)
 - 5) Column (h) calculated as the total Market Proceeds Allocation of \$-55,110,406 multiplied by the %-to-total allocation in column (f)
 - 6) Lighting includes Schedules OL, AL, MSL, EMU, MU and LED

THE POTOMAC EDISON COMPANY - MARYLAND
 OPTION 2
 Calculation of August through December 2022 Warrior Run PURPA Surcharge

Rate Schedule (a)	August through December 2022 Warrior Run Contract Payments			Over Recovery Allocation (g)	Aug-Dec 2022 Market Proceeds Allocation (h)	Net Warrior Run PURPA Allocation (pre-tax) (i) = (f)+(g)+(h)	Net Warrior Run PURPA Allocation (post-tax) (j)=(i) / 0.977227	Aug through Dec 2022 Forecast kWh (k)	Aug through Dec 2022 Forecast kW (l)	Aug through Dec 2022 Warrior Run PURPA Surcharge \$/kWh (m)	Resultant Warrior Run PURPA Collection (o)	
	Capacity Allocation Ratio (b)	Capacity Allocation (c)	Energy Allocation Ratio (d)									Energy Allocation (e)
R	0.534846	\$ 16,052,375	0.494581	\$ 16,287,160	\$ 32,339,535	\$ (15,069,443)	\$ (28,314,649)	\$ (11,044,557)	\$ (11,301,936)	\$ (0.00851)	\$ (11,301,936)	
C	0.016888		0.013180							\$ (0.00851)	\$ (258,502)	
G	0.130291		0.117018							\$ (0.00851)	\$ (2,874,306)	
Hag & Fred	0.000118		0.000182							\$ (0.00851)	\$ (4,180)	
	0.147296	\$ 4,420,813	0.130379	\$ 4,293,549	\$ 8,714,362	\$ (4,150,114)	\$ (7,629,797)	\$ (3,065,549)	\$ (3,136,988)	\$ (0.00851)	\$ (3,136,988)	
C-A	0.002424		0.002034							\$ (0.01156)	\$ (50,251)	
CSH	0.001691		0.001470							\$ (0.01156)	\$ (37,965)	
	0.004115	\$ 123,505	0.003505	\$ 115,412	\$ 238,917	\$ (115,942)	\$ (209,182)	\$ (86,207)	\$ (88,216)	\$ (0.00324)	\$ (88,216)	
PH, AGS	0.251778	\$ 7,586,622	0.257378	\$ 8,475,763	\$ 16,032,385	\$ (7,083,909)	\$ (14,037,040)	\$ (5,098,564)	\$ (5,217,379)	\$ (0.00324)	\$ (5,217,379)	
PP	0.051441	\$ 1,543,912	0.110504	\$ 3,639,040	\$ 5,182,952	\$ (1,449,374)	\$ (4,537,897)	\$ (804,319)	\$ (823,063)	\$ (0.00129)	\$ (823,063)	
Lighting	0.010524	\$ 315,844	0.003652	\$ 120,275	\$ 436,119	\$ (296,504)	\$ (381,841)	\$ (242,226)	\$ (247,871)	\$ (0.01900)	\$ (247,871)	
TOTALS	1.000000	\$ 30,013,071	1.000000	\$ 32,931,199	\$ 62,944,270	\$ (28,175,286)	\$ (55,110,406)	\$ (20,341,422)	\$ (20,815,452)	2,824,475,838	2,557,348	\$ (20,815,452)

- Notes:
- 1) Allocation ratios in columns (b) and (d) from 2020 billing determinants
 - 2) Column (c) calculated as the total Capacity Allocation of \$30,013,071 multiplied by the Capacity Allocation Ratio in column (b)
 - 3) Column (e) calculated as the total Energy Allocation of \$32,931,199 multiplied by the Energy Allocation Ratio in column (d)
 - 4) Column (g) calculated as the total Over Recovery of \$-28,175,286 multiplied by the Capacity Allocation Ratio in column (b)
 - 5) Column (h) calculated as the total Market Proceeds Allocation of \$-55,110,406 multiplied by the %-to-total allocation in column (f)
 - 6) Lighting includes Schedules OL, AL, MSL, EMU, MU and LED