

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)
Edison Company, The Cleveland Electric)
Illuminating Company, and The Toledo) Case No. 25-0092-EL-SSO
Edison Company for Authority to)
Provide for a Standard Service Offer)
Pursuant to R.C. 4928.143 in the Form of)
an Electric Security Plan)

DIRECT TESTIMONY OF

BRANDON S. MCMILLEN

ON BEHALF OF

**OHIO EDISON COMPANY
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
THE TOLEDO EDISON COMPANY**

January 31, 2025

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Brandon McMillen. My business address is 76 South Main Street, Akron,
4 Ohio 44308.

5 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

6 A. I am employed by FirstEnergy Service Company (“FESC”) as the Manager of Rates and
7 Regulatory Affairs in the Ohio Rates and Regulatory Affairs department.

8 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL**
9 **BACKGROUND.**

10 A. I received a Bachelor of Science degree in Mathematics from the University of Mount
11 Union (formerly, Mount Union College) and a Master of Science degree in Mathematics
12 from Youngstown State University. I joined FESC in July 2012 as an analyst in the Ohio
13 Rates and Regulatory Affairs department and have since taken on roles of increasing
14 responsibility within the department. In 2022, I was named to my current position.

15 **Q. WHAT ARE YOUR RESPONSIBILITIES IN YOUR CURRENT POSITION?**

16 A. My current responsibilities include managing the preparation of various riders for Ohio
17 Edison Company (“OE”), The Cleveland Electric Illuminating Company (“CEI”), and The
18 Toledo Edison Company (“TE”) (collectively, the “Companies”). I also conduct various
19 analyses for the Ohio Rates and Regulatory Affairs department, including, but not limited
20 to, revenue requirements, return on investments and typical bill analyses.

1 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC UTILITIES**
2 **COMMISSION OF OHIO?**

3 A. Yes. I have testified or submitted written testimony before the Public Utilities Commission
4 of Ohio (“Commission”) on behalf of the Companies in proceedings including the
5 Companies’ most recent ESP cases (Case Nos. 14-1297-EL-SSO and 23-301-EL-SSO),
6 phase two of the Companies’ distribution grid modernization plan (Case No. 22-0704-EL-
7 UNC, *et al.*), the Companies’ distribution platform modernization plan (Case No. 17-2436-
8 EL-UNC), numerous rider audit proceedings (*e.g.*, Case Nos. 13-2173-EL-RDR, 14-1947-
9 EL-RDR, 15-1843-EL-RDR, 16-2167-EL-RDR, 17-2277-EL-RDR), and the Companies’
10 pending distribution rate case (Case Nos. 24-468-EL-AIR, *et al.* (“2024 Base Rate Case”).

11 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

12 A. The purpose of my testimony is to address the following aspects of the Companies’
13 proposed sixth electric security plan (“ESP VI”):

- 14 • Delivery Capital Recovery Rider (“Rider DCR”);
- 15 • Advanced Metering Infrastructure / Modern Grid Rider (“Rider AMI”);
- 16 • Economic Load Response Program Rider (“Rider ELR”) / Economic Development
17 Rider (“Rider EDR”);
- 18 • Energy Efficiency Cost Recovery Rider (“Rider EEC”); and
- 19 • Non-Market-Based Services Rider (“Rider NMB”) and Rider NMB Pilot Program.

20 **Q. ARE YOU SPONSORING ANY ATTACHMENTS?**

- 21 A. Yes. I am sponsoring the following items:
- 22 • Attachment BSM-1 – Rider DCR Redline Tariff Sheets;
 - 23 • Attachment BSM-2 – Rider AMI Redline Tariff Sheets;

- 1 • Attachment BSM-3 – Rider ELR Redline Tariff Sheets;
- 2 • Attachment BSM-4 – Rider DSE Redline Tariff Sheets;
- 3 • Attachment BSM-5 – Rider EDR Redline Tariff Sheets;
- 4 • Attachment BSM-6 – Rider EEC Calculations and supporting work papers; and
- 5 • Attachment BSM-7 – Rider EEC Tariff Sheets.

6

7 **II. DELIVERY CAPITAL RECOVERY RIDER**

8 **Q. WHAT IS RIDER DCR?**

9 A. Rider DCR provides the Companies the opportunity to recover a return of and on plant-in-
10 service that was not included in the rate base in the Companies’ last distribution rate case,
11 as well as property taxes, Commercial Activity Tax (“CAT”), and income taxes associated
12 with these capital additions. The return earned on such plant is based on the current
13 approved cost of debt, return on equity, and capital structure. The net capital additions
14 included in Rider DCR reflect gross plant in service not approved in the Companies’ last
15 distribution rate case, less growth in accumulated depreciation reserve, accumulated
16 deferred income taxes and excess deferred income taxes resulting from the Tax Cuts and
17 Jobs Act associated with the plant in service. Any capital additions that are recovered
18 elsewhere in the Companies’ rates are excluded from Rider DCR. Rider DCR revenue is
19 subject to annual revenue caps and audits.

20 **Q. IN ESP VI, DO THE COMPANIES SEEK TO IMPLEMENT RIDER DCR ON THE**
21 **SAME TERMS AS THOSE APPROVED BY THE COMMISSION IN ESP V?**

22 A. Yes. Except for proposed modifications to the annual aggregate rider DCR revenue caps
23 as described below, the Companies propose to implement Rider DCR in ESP VI under the

1 same terms approved in the Commission’s Opinion and Order in ESP V (“ESP V Order”),
2 as follows:

- 3 1. Limit the FERC Accounts included for recovery in Rider DCR to 360 – 374;
- 4 2. Use actual plant-in-service instead of projected plant-in-service when
5 calculating the revenue requirements for Rider DCR;
- 6 3. Use “hard caps” on the annual Rider DCR revenue that can be collected, that
7 are not susceptible to fluctuation based on prior years’ outcomes;
- 8 4. Update and reconcile Rider DCR quarterly, with proposed rates filed at least
9 sixty days before their effective date; provided, however, that if an error is
10 found by Staff or the Companies, any final corrections will be made at least
11 seven days prior to the effective date of the filing;
- 12 5. Submit quarterly filings no later than May 1, August 1, November 1, and
13 February 1, with rates effective on July 1, October 1, January 1, and April 1,
14 respectively, unless otherwise ordered by the Commission;
- 15 6. Include in the quarterly filings actual plant balances as of March 31, June 30,
16 September 30, and December 31, respectively;
- 17 7. Calculate the Rider DCR rates as a percentage of base distribution revenues,
18 including both fixed and volumetric charges, with each rate schedule paying the
19 same Rider DCR rate for each Company;
- 20 8. Use individual Company revenue caps based on the following percentages of
21 the total aggregate cap: CEI at 60%; OE at 65% and TE at 15%;

- 1 9. If the Companies’ aggregate Rider DCR revenue requirement exceeds the
2 revenue cap, reduce each Company’s revenue requirement proportionately to
3 their individual revenue requirements to get to the overall revenue cap;
- 4 10. Use the Companies’ System Average Interruption Frequency Index (“SAIFI”)
5 and Customer Average Interruption Duration Index (“CAIDI”) results from the
6 prior year to determine the aggregate revenue caps (as explained more below);
- 7 11. Update the Rider DCR calculation to incorporate all applicable inputs approved
8 in the Companies’ pending 2024 Base Rate Case, including return on equity,
9 cost of debt, capital structure, and depreciation rates; and
- 10 12. Add a schedule to Rider DCR filings tracking Rider DCR revenue compared to
11 the revenue requirements, with any differences reconciled through Rider DCR.

12 Also consistent with the ESP V Order, Rider DCR will continue to be subject to
13 independent annual audits and will remain subject to reconciliation in ESP VI, including,
14 but not limited to, increases or refunds based upon the results of the annual audits.

15 **Q. WHAT ARE THE COMPANIES’ PROPOSED ANNUAL AGGREGATE RIDER**
16 **DCR REVENUE CAP INCREASES IN ESP VI?**

17 A. The Companies propose aggregate annual Rider DCR cap increases of \$37 million to \$43
18 million. To account for growth in rate base immediately following the date certain in the
19 Companies’ 2024 Base Rate Case (May 31, 2024), the determination of the Rider DCR
20 caps in ESP VI will start June 1, 2024. The specific annual aggregate Rider DCR revenue
21 cap increase would be based on the Companies’ SAIFI and CAIDI reliability performance
22 results from the prior year. If all six of the CAIDI and SAIFI reliability standards are met
23 in a given year, then the aggregate revenue cap increase in the next year will be \$43 million;

1 if five of six are met in a given year, the aggregate revenue cap increase in the next year
 2 will be \$41 million; if four of six are met, the aggregate revenue cap increase in the next
 3 year would be \$39 million. If the Companies fail to meet three or more of their six CAIDI
 4 or SAIFI standards, the aggregate revenue cap increase would be \$37 million. The initial
 5 Rider DCR revenue cap in ESP VI will also take into consideration the lag in recovery.
 6 For example, if ESP VI and new base distribution rates go into effect January 1, 2026, and
 7 the Companies met four of their reliability standards in 2023, six of their reliability
 8 standards in 2024, and six of their reliability standards in 2025, the aggregate Rider DCR
 9 revenue cap for the period January 1, 2026 through December 31, 2026 will be
 10 approximately \$69.5 million, as shown below in millions:

Period	Reliability Standards	Annual Cap – No Lag		Annual Cap With Lag	
		Increase	Total	Increase	Total
June 2024 – May 2025	4 in 2023	\$39.0	\$39.0	\$7.3	\$7.3
June 2025 – May 2026	6 in 2024	\$43.0	\$82.0	\$44.7	\$44.7
June 2026 – May 2027	6 in 2025	\$43.0	\$125.0	\$87.4	\$87.4
Jan 2026 – Dec 2026 ¹					\$69.5

11

12 **Q. ARE THE COMPANIES’ PROPOSED CAP INCREASES REASONABLE?**

13 A. Yes. The proposed Rider DCR aggregate revenue cap increases represent approximately
 14 2.3%-2.6% of their proposed base distribution revenue in the 2024 Base Rate Case. While
 15 the proposed annual aggregate cap increases are higher than in ESP V, they are still lower
 16 than the annual cap increases of similar riders at other Ohio electric utilities. In addition,

¹ The illustrative Rider DCR cap for calendar year 2026 assumes equal monthly revenue cap growth, and recovery lag of 4-6 months. For example, the October 1, 2024 through December 31, 2024 Rider DCR rates would be based on an annual revenue cap of \$3.25 million as of June 2024, and the January 1, 2025 through March 31, 2025 Rider DCR rates would be based on an annual revenue cap of \$13.0 million as of September 2024, etc.

1 the Companies' proposed cap increases resume the reliability performance band of up to
2 \$6 million annually which the Commission approved in ESP V.

3 **Q. DO THESE PROPOSED CAPS ACCOUNT FOR THE POTENTIAL INCREASE**
4 **IN TANGIBLE PERSONAL PROPERTY TAX EXPENSE DISCUSSED BY**
5 **ASSISTANT CONTROLLER, TAX, GREG GAWLIK?**

6 A. No. Should the property tax expense increase discussed by Mr. Gawlik occur, the
7 Companies seek a one-time increase of \$25 million to their aggregate annual Rider DCR
8 cap, which will remain in place for the remainder of ESP VI. The Companies will include
9 documentation in their next quarterly Rider DCR filing supporting the increase in property
10 tax expense. Otherwise, this one-time increase will not impact the proposed annual cap
11 increases discussed above.

12 **Q. WHAT BENEFITS WILL RIDER DCR PROVIDE IN ESP VI?**

13 A. While the costs included in Rider DCR would be recoverable even without the rider,
14 continuation of Rider DCR and the associated audit process provide benefits to customers.
15 For example, Rider DCR helps support distribution investments to maintain safe and
16 reliable service to customers and provides other administrative and regulatory benefits.
17 Updating Rider DCR on a quarterly basis better aligns the costs customers pay with the
18 investments made by the Companies, and helps promote gradualism in setting customer
19 rates. The proposed Rider DCR revenue caps also limit annual revenue increases and
20 promote rate certainty, stability, and predictability. By using the proposed revenue caps
21 discussed above, the Companies share in the risk of reliability performance, since there is
22 an opportunity for a higher annual cap increase only in years when CAIDI and/or SAIFI
23 reliability standards are met by the Companies. In addition, the quarterly updates and

1 annual independent audits facilitate a timelier review of the Companies' distribution
2 investments than would otherwise occur between distribution base rate cases. With
3 quarterly updates and annual, independent audits, parties are continually afforded the
4 opportunity to review and verify the reasonableness of the Companies' Rider DCR rates.
5 Rider DCR also provides the opportunity for an audit focused specifically on the costs
6 included in Rider DCR, as opposed to having those costs included as part of a broader
7 review of all costs in a distribution base rate case.

8
9 **III. ADVANCED METERING INFRASTRUCTURE / MODERN GRID RIDER**

10 **Q. WHAT IS RIDER AMI?**

11 A. Rider AMI is a non-bypassable rider that was previously approved by the Commission to
12 enable the Companies to recover costs associated with the Ohio Site Deployment of the
13 Smart Grid Modernization Initiative in Case Nos. 09-1820-EL-ATA, *et al.* ("SGMI"), and
14 additional grid modernization programs approved in separate cases, such as the first phase
15 of the Companies' grid modernization business plan approved in Case Nos. 16-481-EL-
16 UNC, *et al.* ("Grid Mod I"), and the second phase of the Companies' grid modernization
17 business plan approved in Case Nos. 22-704-EL-UNC, *et al.* ("Grid Mod II"). Rider AMI
18 is subject to quarterly updates and reconciliation, as well as annual audits by Staff.

19 **Q. IN ESP VI, DO THE COMPANIES SEEK TO IMPLEMENT RIDER AMI ON THE**
20 **SAME TERMS AS THOSE APPROVED BY THE COMMISSION IN ESP V?**

21 A. Yes. As described below, the Companies propose to implement Rider AMI in ESP VI
22 under the same terms approved in the ESP V Order, as follows:

- 1 1. Use actual plant-in-service instead of projected plant-in-service when
2 calculating the revenue requirements for Rider AMI.
- 3 2. Exclude from Rider AMI costs incurred after June 1, 2019 associated with
4 SGMI.
- 5 3. Exclude costs associated with SGMI and Grid Mod I from Rider AMI after the
6 costs are included in the Companies' new base rates in the 2024 Base Rate Case.
- 7 4. Submit each quarterly Rider AMI filing at least 60 days in advance of the
8 effective date of the tariff.
- 9 5. Incorporate in Rider AMI all applicable inputs that are approved in the 2024
10 Base Rate Case (*e.g.*, return on equity, cost of debt, capital structure).

11 Also consistent with the ESP V Order, Rider AMI will be subject to independent
12 annual audits that may be completed by a third-party auditor, with the costs of such audits
13 paid by the Companies but eligible for recovery under Rider AMI. Rider AMI will remain
14 subject to reconciliation in ESP VI, including, but not limited to, increases or refunds based
15 upon the results of the annual audits. Further, in ESP VI the Companies will continue to
16 implement the terms and conditions associated with Rider AMI approved in Grid Mod II
17 and any additional grid modernization programs.

18 **Q. WHAT BENEFITS WILL RIDER AMI PROVIDE DURING ESP VI?**

19 A. While the costs included in Rider AMI would be recoverable even without the rider,
20 continuation of Rider AMI and the associated audit process provide benefits to customers.
21 Rider AMI supports the Companies' investments in grid modernization programs, which
22 have been designed to support enhanced reliability and make more granular usage data
23 available to customers and market participants. Furthermore, updating Rider AMI on a

1 quarterly basis better aligns the costs customers pay with the investments made by the
2 Companies and helps promote more gradual rate impacts for customers than may otherwise
3 occur. Continuation of the annual audit process allows for a timelier review of Rider AMI
4 investments than may otherwise occur between distribution base rate cases. Rider AMI
5 also provides the opportunity for an audit focused specifically on the costs included in
6 Rider AMI, as opposed to having those costs included as part of a broader review of all
7 costs in a base rate case.

8
9 **IV. ECONOMIC LOAD RESPONSE PROGRAM RIDER / ECONOMIC**
10 **DEVELOPMENT RIDER**

11 **Q. WHAT IS RIDER ELR?**

12 A. Rider ELR is a tariff-based interruptible program to support demand response and
13 economic development. Customers participating in Rider ELR are subject to emergency
14 curtailment events called by the Companies or by PJM Interconnection, L.L.C. (“PJM”),
15 and have the opportunity to earn credits on their monthly electric bills.

16 **Q. WHICH CUSTOMERS ARE ELIGIBLE TO PARTICIPATE IN RIDER ELR**
17 **DURING ESP VI?**

18 A. Consistent with the ESP V Order, all customers participating under Rider ELR in ESP IV
19 will be eligible to participate in ESP VI. Other customers will continue to have the
20 opportunity to file a reasonable arrangement application for Commission approval in order
21 to become eligible for Rider ELR.

1 **Q. IN ESP VI, CAN THE COMPANIES INTERRUPT PARTICIPATING RIDER ELR**
2 **CUSTOMERS FOR TRANSMISSION AND DISTRIBUTION EMERGENCIES?**

3 A. Yes. Consistent with ESP IV and the ESP V Order, the proposed Rider ELR tariff in ESP
4 VI would continue to allow the Companies to interrupt participating customers for
5 transmission and distribution emergencies.

6 **Q. IN ESP VI, DO THE COMPANIES SEEK TO IMPLEMENT RIDER ELR ON THE**
7 **SAME TERMS AS THOSE APPROVED BY THE COMMISSION IN ESP V?**

8 A. Yes. The Companies propose to implement Rider ELR in ESP VI under the same terms
9 and conditions approved in the ESP V Order, including:

- 10 1. Rider ELR customers can opt to obtain their own curtailment service provider
11 (“CSP”) to participate in PJM demand response programs and retain any PJM
12 revenues received, starting with the first full PJM delivery year in ESP VI.
- 13 2. For Rider ELR customers choosing their own CSP, the value of the credit will
14 be reduced by \$2 per kW of curtailable load per month.
- 15 3. For Rider ELR customers who do not select their own CSP, revenues resulting
16 from the Companies bidding Rider ELR resources into PJM capacity auctions
17 will continue to be split 80% to customers and 20% retained by the Companies.
- 18 4. Rider ELR participants may reset their firm service levels annually.
- 19 5. Rider ELR participants will be subject to annual performance testing by the
20 Companies, except for those Rider ELR customers who are required to undergo
21 annual performance testing by PJM.
- 22 6. The credits for ELR participants will be gradually reduced (as discussed below).
- 23 7. Recovery of Rider ELR credits will be in Rider EDR (as discussed below).

1 8. The penalty for non-compliance will be modified to eliminate the ECE charge.
2 The proposed Rider ELR tariffs for ESP VI are provided in Attachment BSM-3.

3 **Q. PLEASE EXPLAIN HOW RIDER ELR PARTICIPANTS WOULD BE SUBJECT**
4 **TO ANNUAL PERFORMANCE TESTING BY THE COMPANIES.**

5 A. Consistent with the ESP V Order, the Companies propose to require Rider ELR participants
6 to undergo annual performance testing by the Companies and/or PJM to ensure compliance
7 with Rider ELR program obligations. Rider ELR participants who select their own CSP
8 and participate in PJM demand response programs may satisfy their annual testing
9 requirement through PJM. However, if PJM does not perform such a test, these participants
10 must satisfy the Companies' annual performance testing requirements. All other ELR
11 participants who use the Companies as their CSP would be required to complete annual
12 performance testing with the Companies.

13 **Q. WHAT ARE THE PROPOSED RIDER ELR CREDITS IN ESP VI?**

14 A. The Companies are proposing gradual reductions to credits over the term of ESP VI,
15 consistent with the ESP V Order. For the first year of ESP VI, the total credits to Rider
16 ELR customers will be \$8/kW of curtailable load per month. For year 2 and beyond the
17 total credits will be reduced to \$7/kW of curtailable load per month. These credits will be
18 reduced by another \$2/kW of curtailable load per month for Rider ELR participants who
19 select their own CSP, as noted above. These proposed credits attempt to balance the
20 reliability and economic development benefits provided by Rider ELR with the potential
21 costs to both participating and non-participating customers.

1 **Q. HOW WILL RIDER ELR CREDITS BE RECOVERED IN ESP VI?**

2 A. In ESP IV, the Commission authorized Rider ELR credits to be recovered through two
3 separate credit provisions: (1) a \$5 per kW of curtailable load per month credit under Rider
4 ELR was recovered under the Companies' Demand Side Management and Energy
5 Efficiency Rider ("Rider DSE1"); and (2) a \$5 per kW of curtailable load per month credit
6 under the Economic Development Rider ("Rider EDR") provision (b) was recovered under
7 Rider EDR provision (e). The ESP V Order directed the Companies to recover all Rider
8 ELR program costs through Rider EDR by shifting what was previously recovered through
9 Rider DSE1 to a new component of Rider EDR, with the same allocation used under Rider
10 DSE1. In ESP VI, the Companies propose to recover all Rider ELR program costs through
11 Rider EDR in the same manner approved in the ESP V Order.

12
13 **V. ENERGY EFFICIENCY COST RECOVERY RIDER**

14 **Q. WHAT IS RIDER EEC?**

15 A. Rider EEC was authorized in the ESP V Order to recover costs of the Companies' proposed
16 energy efficiency programs.

17 **Q. IN ESP VI, DO THE COMPANIES SEEK TO IMPLEMENT RIDER EEC ON THE**
18 **SAME TERMS AS THOSE APPROVED BY THE COMMISSION IN ESP V?**

19 A. Yes. Except for the proposed modification to apply carrying charges as described below,
20 the Companies propose to implement Rider EEC in ESP VI under the same terms as
21 approved in the ESP V Order, as follows:

- 22 1. Rider EEC will be calculated to only recover actual expenses incurred during
23 ESP VI.

- 1 2. Following the initial Rider EEC tariffs implemented in ESP VI, Rider EEC will
2 be updated and reconciled annually on or about April 1st with rates to be
3 effective June 1st, unless otherwise ordered.
- 4 3. The revenue requirement will include actual costs incurred net of actual
5 revenues received, grossed up for CAT.
- 6 4. The revenue requirement will be allocated to the Companies' residential
7 customers since Companies' Witness Miller is proposing to implement
8 residential-only programs, and the charge will be a per kWh charge for these
9 customers.

10 An example of the proposed revenue requirement and rate design calculations for
11 Rider EEC are included in Attachment BSM-6. Also, the proposed Rider EEC tariff sheet
12 is included in Attachment BSM-7.

13 **Q. HOW WILL CARRYING CHARGES BE APPLIED TO RIDER EEC?**

14 A. Since Rider EEC will recover actual costs only and is updated annually, there will be a lag
15 on cost recovery of up to two years. For example, actual costs incurred in April of a given
16 year will not be fully recovered until May two years later. To account for this lag, the
17 Companies propose to apply carrying charges monthly to any over- or under-recovered
18 Rider EEC balances at their current approved cost of debt.

19 **Q. WILL RIDER EEC BE SUBJECT TO AUDIT IN ESP VI?**

20 A. Yes. In August of each year, the Companies will file an application with the Commission
21 to initiate an audit of Rider EEC covering the prior year's rate. Rider EEC is subject to
22 reconciliation, including, but not limited to, increases or refunds, based upon the results of
23 these audits.

1 **Q. WHAT BENEFITS WILL RIDER EEC PROVIDE IN ESP VI?**

2 A. Rider EEC will support the Companies' energy efficiency programs described by
3 Companies' Witness Miller. In addition, as described above, once Rider EEC goes into
4 effect, it would be subject to an annual review that covers a 12-month period. This process
5 allows for a timelier review than may otherwise occur between base rate cases. It also
6 provides the opportunity for an audit focused specifically on the Companies' energy
7 efficiency program expenses, which should provide administrative benefits. Rider EEC
8 will ensure that customers are paying the Companies' actual costs of the programs, with
9 timely reconciliations, subject to annual regulatory review and audit.

10

11 **VI. NON-MARKET-BASED SERVICES RIDER AND PILOT PROGRAM**

12 **Q. WHAT IS RIDER NMB?**

13 A. Rider NMB recovers non-market-based transmission related charges that are imposed on
14 the Companies by the Federal Energy Regulatory Commission or any regional
15 transmission organization, such as PJM. Costs recovered through Rider NMB are allocated
16 to the Companies' rate schedules based on the four coincident system peaks from the prior
17 year. Residential and lighting customers are charged on a per kWh basis, while commercial
18 and industrial rate schedules are charged based on monthly billing demand. Rider NMB is
19 non-bypassable unless the customer participates in the Rider NMB Pilot Program.

1 **Q. IN ESP VI, DO THE COMPANIES SEEK TO IMPLEMENT RIDER NMB ON THE**
2 **SAME TERMS AS THOSE APPROVED BY THE COMMISSION IN ESP V?**

3 A. Yes. The Companies propose to continue Rider NMB on the same terms and conditions
4 as authorized in ESP V. Rider NMB will continue to be subject to reconciliation, including,
5 but not limited to, increases or refunds, based upon the results of annual audits.

6 **Q. WHAT IS THE RIDER NMB PILOT PROGRAM?**

7 A. The Rider NMB Pilot Program, which was approved in the Companies' ESP IV, sought to
8 explore whether certain customers could benefit from opting out of Rider NMB and obtain,
9 directly or indirectly through a competitive retail electric service provider, all non-market-
10 based transmission services. The program provides an opportunity for certain customers
11 to shop for transmission services similar to shopping for generation services.

12 **Q. ARE THE COMPANIES PROPOSING TO CONTINUE THE RIDER NMB PILOT**
13 **PROGRAM IN ESP VI?**

14 A. Yes. The Companies propose to continue the Rider NMB Pilot Program in ESP VI under
15 the same terms authorized by the Commission in ESP IV and ESP V. In addition to the
16 customers identified in ESP IV as eligible, the ESP V Order opened the Rider NMB Pilot
17 Program to new commercial and industrial customers with an aggregate load not to exceed
18 100 MW on a first-come, first-served basis, with each individual new participant capped
19 at 20 MW. As of January 31, 2025, that expanded eligibility capacity has not been fully
20 subscribed. In ESP VI, all customers eligible in ESP IV will remain eligible, and the
21 Companies will re-open the expanded eligibility authorized in ESP V for the remaining
22 capacity. Additional customers may continue to seek eligibility for the Rider NMB Pilot
23 Program by filing an application for a reasonable arrangement.

1 VII. CONCLUSION

2 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

3 A. Yes.

RIDER DCR
Delivery Capital Recovery Rider

APPLICABILITY:

Applicable to any customer who receives electric service under the Company's rate schedules set forth below. The Delivery Capital Recovery Rider (DCR) charges will apply, by rate schedule, effective for bills rendered beginning ~~February 1, 2025~~ [DATE]. This Rider is not avoidable for customers who take electric generation service from a certified supplier.

RATE:

Rider DCR is charged as a percentage of the customer's distribution charges under the Company's rate schedules, excluding charges under any applicable riders.

RS (all kWhs, per kWh%)	1.1448 <u>XX.XXXX%</u>
GS (per kW of Billing Demand%)	\$5.0860 <u>XX.XXXX%</u>
GP (per kW of Billing Demand%)	\$1.2720 <u>XX.XXXX%</u>
GSU (per kW of Billing Demand%)	\$1.2046 <u>XX.XXXX%</u>

PROVISIONS:

The charges set forth in this Rider recover costs associated with delivery plant investments made since the date certain in Case No. 07-551-EL-AIR, exclusive of any delivery plant investments being recovered elsewhere.

RIDER UPDATES:

The charges contained in this Rider shall be updated on a quarterly basis. ~~Effective with the filing made on or about April 20, 2014, the Company will file a request for approval of the Rider charges on or about no later than March 31st, May 1st, August 1st, June 30th, November 1st, September 30th and February 1st, December 31st~~ of each year. Charges, unless otherwise ordered by the PUCO, shall become effective on a bills rendered basis on ~~June-July 1st, September-October 1st, December-January 1st and March-April 1st~~ of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission, ~~in accordance with the August 25, 2010 Opinion and Order in Case No. 10-388-EL-SSO, the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO and upon the Commission's orders in Case No. 18-47-AU-COI.~~

RIDER DCR
Delivery Capital Recovery Rider

APPLICABILITY:

Applicable to any customer who receives electric service under the Company's rate schedules set forth below. The Delivery Capital Recovery Rider (DCR) charges will apply, by rate schedule, effective for bills rendered beginning February 1, 2025[DATE]. -This Rider is not avoidable for customers who take electric generation service from a certified supplier.

RATE:

Rider DCR is charged as a percentage of the customer's distribution charges under the Company's rate schedules, excluding charges under any applicable riders.

RS (<u>all kWhs, per kWh%</u>)	0.9711 ¢ <u>XX.XXXX%</u>
GS (<u>per kW of Billing Demand%</u>)	\$3.2608 ¢ <u>XX.XXXX%</u>
GP (<u>per kW of Billing Demand%</u>)	\$1.9862 ¢ <u>XX.XXXX%</u>
GSU (<u>per kVa of Billing Demand%</u>)	\$0.9194 ¢ <u>XX.XXXX%</u>

PROVISIONS:

The charges set forth in this Rider recover costs associated with delivery plant investments made since the date certain in Case No. 07-551-EL-AIR, exclusive of any delivery plant investments being recovered elsewhere.

RIDER UPDATES:

The charges contained in this Rider shall be updated on a quarterly basis. ~~Effective with the filing made on or about April 20, 2014, the Company will file a request for approval of the Rider charges on or about no later than May 1st March 31st, August 1st June 30th, November 1st September 30th and February 1st December 31st of each year.~~ Charges, unless otherwise ordered by the PUCO, shall become effective on a bills rendered basis on ~~June~~July 1st, ~~September~~October 1st, ~~December~~January 1st and ~~March~~April 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission. ~~in accordance with the August 25, 2010 Opinion and Order in Case No. 10-388-EL-SSO, the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO and upon the Commission's orders in Case No. 18-47-AU-COI.~~

RIDER DCR
Delivery Capital Recovery Rider

APPLICABILITY:

Applicable to any customer who receives electric service under the Company's rate schedules set forth below. The Delivery Capital Recovery Rider (DCR) charges will apply, by rate schedule, effective for bills rendered beginning ~~February 1, 2025~~ [DATE]. This Rider is not avoidable for customers who take electric generation service from a certified supplier.

RATE:

Rider DCR is charged as a percentage of the customer's distribution charges under the Company's rate schedules, excluding charges under any applicable riders.

RS (all kWhs, per kWh)	0.7251 ¢ <u>XX.XXXX%</u>
GS (per kW of Billing Demand)	\$2.5686 <u>XX.XXXX%</u>
GP (per kW of Billing Demand)	\$0.9313 <u>XX.XXXX%</u>
GSU (per kVa of Billing Demand)	\$0.2330 <u>XX.XXXX%</u>

PROVISIONS:

The charges set forth in this Rider recover costs associated with delivery plant investments made since the date certain in Case No. 07-551-EL-AIR, exclusive of any delivery plant investments being recovered elsewhere.

RIDER UPDATES:

The charges contained in this Rider shall be updated on a quarterly basis. ~~Effective with the filing made on or about April 20, 2014, the Company will file a request for approval of the Rider charges on or about no later than March 31st, May 1st, June 30th, August 1st, September 30th, November 1st and December 31st, February 1st of each year. Charges, unless otherwise ordered by the PUCO, shall become effective on a bills rendered basis on June/July 1st, September/October 1st, December/January 1st and March/April 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission, in accordance with the August 25, 2010 Opinion and Order in Case No. 10-388-EL-SSO, the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO and upon the Commission's orders in Case No. 18-47-AU-COI.~~

RIDER AMI
Advanced Metering Infrastructure / Modern Grid Rider

APPLICABILITY:

Applicable to any customer who receives electric service under the Company's rate schedules, with the exception of General Service - Transmission (Rate "GT"). This Advanced Metering Infrastructure / Modern Grid Rider charge is a fixed monthly charge and will be effective for service rendered beginning ~~February 1, 2025~~[DATE]. This Rider is not avoidable for customers during the period the customer takes electric generation service from a certified supplier.

CHARGE *:

RS	\$1.856
GS	\$16.894
GP	\$153.135
GSU	\$223.366
STL (per lighting unit)	\$1.185
TRF	\$1.538
POL	\$6.703

* The charges listed above, except those for rate schedule STL, will be applied per customer, per month. Any customer who receives electric service under rate schedule STL will have the above charge applied per lighting unit, per month.

PROVISIONS:

The charges set forth in this Rider recover costs associated with ~~the Ohio Site Deployment of the Smart Grid Modernization Initiative in Case No. 09-1820-EL-ATA. Any additional costs associated with expansion of the Ohio Site Deployment or the implementation of any additional approved~~ advanced metering or grid modernization infrastructure programs in Ohio including, but not limited to, Commission directed, legislatively mandated or Company initiated and Commission approved infrastructure expansion ~~will be collected through this Rider programs.~~

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on a quarterly basis. No later than ~~December~~November 1st, ~~March~~February 1st, ~~June~~May 1st and ~~September~~August 1st of each year, the Company shall file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st, April 1st, July 1st and October 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission, ~~in accordance with the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO and upon the Commission's orders in Case No. 18-47-AU-COL.~~

RIDER AMI
Advanced Metering Infrastructure / Modern Grid Rider

APPLICABILITY:

Applicable to any customer who receives electric service under the Company's rate schedules, with the exception of General Service - Transmission (Rate "GT"). This Advanced Metering Infrastructure / Modern Grid Rider charge is a fixed monthly charge and will be effective for service rendered beginning ~~February 1, 2025~~[DATE]. This Rider is not avoidable for customers during the period the customer takes electric generation service from a certified supplier.

CHARGE *:

RS	\$2.185
GS	\$9.346
GP	\$176.342
GSU	\$321.015
STL (per lighting unit)	\$0.434
TRF	\$1.706
POL	\$2.969

* The charges listed above, except those for rate schedule STL, will be applied per customer, per month. Any customer who receives electric service under rate schedule STL will have the above charge applied per lighting unit, per month.

PROVISIONS:

The charges set forth in this Rider recover costs associated with ~~the Ohio Site Deployment of the Smart Grid Modernization Initiative in Case No. 09-1820-EL-ATA. Any additional costs associated with expansion of the Ohio Site Deployment or the implementation of any additional approved~~ advanced metering or grid modernization infrastructure programs in Ohio including, but not limited to, Commission directed, legislatively mandated or Company initiated and Commission approved infrastructure expansion ~~will be collected through this Rider~~programs.

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on a quarterly basis. No later than ~~December~~November 1st, ~~March~~February 1st, ~~June~~May 1st and ~~September~~August 1st of each year, the Company shall file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st, April 1st, July 1st and October 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission, ~~in accordance with the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO and upon the Commission's orders in Case No. 18-47-AU-COL.~~

RIDER AMI
Advanced Metering Infrastructure / Modern Grid Rider

APPLICABILITY:

Applicable to any customer who receives electric service under the Company's rate schedules, with the exception of General Service - Transmission (Rate "GT"). This Advanced Metering Infrastructure / Modern Grid Rider charge is a fixed monthly charge and will be effective for service rendered beginning ~~February 1, 2025~~[DATE]. This Rider is not avoidable for customers during the period the customer takes electric generation service from a certified supplier.

CHARGE *:

RS	\$1.874
GS	\$10.055
GP	\$98.000
GSU	\$119.576
STL (per lighting unit)	\$0.694
TRF	\$1.409
POL	\$1.834

* The charges listed above, except those for rate schedule STL, will be applied per customer, per month. Any customer who receives electric service under rate schedule STL will have the above charge applied per lighting unit, per month.

PROVISIONS:

The charges set forth in this Rider recover costs associated with ~~the Ohio Site Deployment of the Smart Grid Modernization Initiative in Case No. 09-1820-EL-ATA. Any additional costs associated with expansion of the Ohio Site Deployment or the implementation of any additional approved~~ advanced metering or grid modernization infrastructure programs in Ohio including, but not limited to, Commission directed, legislatively mandated or Company initiated and Commission approved infrastructure expansion ~~will be collected through this Rider~~programs.

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on a quarterly basis. No later than ~~December~~November 1st, ~~March~~February 1st, ~~June~~May 1st and ~~September~~August 1st of each year, the Company shall file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st, April 1st, July 1st and October 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission, ~~in accordance with the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO and upon the Commission's orders in Case No. 18-47-AU-COL.~~

RIDER ELR
Economic Load Response Program Rider

APPLICABILITY:

This Economic Load Response Program Rider ("Program") is available to customers taking service from the Company at primary voltages or higher voltages provided that all of the following ~~six-four~~ conditions are met at the time of initiation of service to the customer under this Rider and on a continuing basis thereafter: (i) the customer took service under the Program as of ~~[DATE] May 31, 2016 or the customer was historically eligible for Rider ELR and provided written notice of intent to participate in the Program on or before May 31, 2015 for up to an additional 136,250 kW of Curtailable Load effective on or after June 1, 2016;~~ (ii) the customer can ~~satisfy all requirements of this tariff successfully demonstrate to the Company that it can reduce its measured load to a pre-established contract Firm Load (as defined under Other Provisions, paragraph A., below) within two hours of notification provided by the Company without the need of a generator (A customer may intend to use a generator to reduce its usage to or below its Firm Load, but if the generator does not operate, the customer must still reduce its usage to or below its Firm Load. Failure of a customer to reduce its usage to or below its Firm Load shall result in the consequences listed in the Emergency Curtailment Event Section herein.);~~ (iii) the customer executes the Company's standard Program contract; ~~and~~ (iv) the customer is taking generation service from the Company or a Competitive Retail Electric Service ("CRES") provider using consolidated billing; ~~-(v) the customer commits its demand response capability to Company for integration into Company's R.C. § 4928.66 compliance programs; and (vi) the Commission finds that the demand response capabilities of customers electing service under this rider shall count towards the Company's compliance with the peak demand reduction benchmarks set forth in R.C. § 4928.66 as applied by the Commission's applicable rules and regulations and shall be considered incremental to interruptible load on the Company's system that existed in 2008. Nothing herein shall preclude a customer from requesting and receiving an exemption from any mechanism designed to recover the cost of energy efficiency and peak demand reduction programs to the extent the exemption is requested to reasonably encourage the commitment of customer-sited capabilities to the Company.~~

A customer may elect to participate in a demand response program offered by PJM Interconnection, L.L.C. ("PJM"); with a Competitive Service Provider ("CSP"), after the ~~2024/2025~~[DATE] planning year. Such customers must notify the Company that they have entered into a contract with a CSP prior to the effective date of this tariff, and the Company will no longer serve as the customer's CSP. All terms and conditions of this rider will continue to apply.

RATES:

In addition to any other charges under any other rate schedules applicable to customer's service, customers participating in the Program shall also pay the charges and receive the credit set forth below:

Charges:

Program Administrative Charge: \$150.00 per month

ECE Charge:

~~During an Emergency Curtailment Event (as defined under Other Provisions, paragraph D., below), the portion of the customer's actual measured load that exceeds its pre-established contract Firm Load for any and all hours during such event shall be assessed an ECE Charge~~

RIDER ELR
Economic Load Response Program Rider

~~which is calculated for each hour of the event as follows. Revenue collected by the Company as a result of any ECE Charge less amounts associated with the Commercial Activity Tax ("CAT") (as defined below) shall be credited towards costs to be collected through the DSE1 charge of Rider DSE:~~

~~$$\text{ECE Charge} = (\text{AL} \times \text{PJM LMP} \times 300\%) \times (1 + \text{LAF}) \times \left(\frac{1}{1 - \text{CAT}}\right)$$~~

~~Where:~~

~~**AL** = the customer's actual hourly load during an Emergency Curtailment Event that exceeds the customer's pre-established contract Firm Load.~~

~~**PJM LMP** = the final Real-Time Locational Marginal Price as defined and specified by PJM at the appropriate pricing node during the applicable hour(s).~~

~~**CAT** = the Commercial Activity Tax rate as established in Section 5751.03 of the Ohio Revised Code.~~

~~**LAF** = Loss Adjustment Factor
— 3.0% for primary voltages
— 0.1% for subtransmission voltages
— 0.0% for transmission voltages~~

Program Credit ("PC"):

Customers taking service under this Rider shall receive a monthly Program Credit which shall be calculated as follows:

$$\text{PC} = \text{CL} \times (\$54.00) / \text{kW/month}$$

Where:

CL is the Curtailable Load, which shall be calculated by the Company for each customer by subtracting the customer's contract Firm Load from its monthly highest thirty (30) minute integrated kW load occurring during the non-holiday weekday hours of 11 a.m. to 5 p.m. Eastern Standard Time (equivalent to noon to 6 p.m. EDT). In no circumstance can the CL be negative nor can the CL be in excess of a contract amount determined based upon the customer's 12 month history as of February 1, 2008. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day. If a Customer chooses to participate with a CSP other than the Company, the Program Credit will be reduced by \$1.00 per kW-month.

RIDER ELR
Economic Load Response Program Rider

Minimum Bill:

The application of the Program Credit shall not produce a total monthly bill for any customer, after including the effects of all rate schedules, riders, and if applicable, the CRES consolidated billing, that results in an average price per kWh less than two (2) cents per kWh.

OTHER PROVISIONS:

A. Firm Load

For purposes of this Rider, "Firm Load" shall be that portion of a customer's electric load that is not subject to curtailment, and for customers electing a CSP, shall be equal to the level registered for participation in PJM demand response programs. ~~Customers will have an opportunity to annually reset their firm service levels. A customer may request a reduction to its contract Firm Load no more than once in any twelve month period. The Firm Load may be reduced to the extent that such reduction is consistent with other terms and conditions set forth in this Rider. Any such change in Firm Load shall be applied beginning with the customer's January bill immediately following the year in which the change has been approved by the Company, provided that advance written request is provided to the Company no less than thirty (30) days prior to the effective billing month of the change. The Company may increase the Firm Load at any time if the Company, at its sole discretion, determines the Firm Load is at a level that the customer fails to demonstrate that they can reach. The Company shall promptly notify the customer of any such change.~~

B. Load Response Program Contract

Customers taking service under this optional Rider shall execute the Company's standard Program contract which, among other things, will confirm the Customer's participation in a demand response program offered by PJM as applicable, establish the Customer's Firm Load as described above, and commit the Customer's demand response capability to the Company ~~for purposes of Company's compliance with the peak demand reduction benchmarks set forth in R.C. §4928.66 as applied by the Commission's applicable rules and regulations~~, unless the Customer is participating through a CSP.

C. Metering

The customer must arrange for interval metering consistent with the Company's Miscellaneous Charges, Tariff Sheet 75.

RIDER ELR
Economic Load Response Program Rider

D. Emergency Curtailment Event

Upon advance notification provided by the Company, a customer taking service under this Rider must curtail all load above its Firm Load during an Emergency Curtailment Event consistent with the Company's instructions. For purposes of this Rider, an Emergency Curtailment Event shall be one in which the Company, a regional transmission organization and/or a transmission operator determines, in its respective sole discretion, that an emergency situation exists that may jeopardize the integrity of either the distribution or transmission system in the area. PJM, which is the regional transmission organization of which the Company is a member, may also initiate an Emergency Curtailment Event upon their sole determination that a pre-emergency situation exists.

If an Emergency Curtailment Event is requested solely by the Company or a transmission operator, a customer will be given no less two hours advance notification to curtail all load above its Firm Load during the Emergency Curtailment Event. An Emergency Curtailment Event requested solely by the Company may occur anytime during the year with no restrictions on the number of events or the duration of an event.

If the Emergency Curtailment Event is requested by PJM, a customer will be notified by the Company of the start time of the Emergency Curtailment Event as determined by PJM. The start time of the Emergency Curtailment Event will be approximately thirty (30) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. However, PJM at its sole discretion may grant a customer an exception to the thirty (30) minute advance notification time of either sixty (60) minutes or one hundred and twenty (120) minutes based on the customer's physical capability to provide load reduction. A customer wishing to seek such exception must submit to the Company a completed request form that the Company will then submit to PJM. If PJM approves the customer request for an exception for sixty (60) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately sixty (60) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. If PJM approves the customer request for an exception for one hundred and twenty (120) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately one hundred and twenty (120) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. The maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM during the months of May through October will be twelve (12) hours and will only occur between 10:00 AM to 10:00 PM (Eastern Prevailing Time). For the months of November through April, the maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM will be fifteen (15) hours and will only occur between 6:00 AM to 9:00 PM (Eastern Prevailing Time). An Emergency Curtailment Event requested solely by PJM may occur any day during the year with no restrictions on the number of events that could occur.

RIDER ELR
Economic Load Response Program Rider

During the entire period of an Emergency Curtailment Event, the customer's actual measured load must remain at or below its Firm Load with such load being measured every clock half hour. A customer's actual measured load shall be determined using the greater of the customer's highest lagging kVA or highest kW during the Emergency Curtailment Event.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds its contract Firm Load, the Company may disconnect the customer ~~from the transmission system~~ for the duration of the Emergency Curtailment Event, at the customer's expense. The Company shall not be liable for any direct or indirect costs, losses, expenses, or other damages, special or otherwise, including, without limitation, lost profits that arise from such disconnection.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds ~~110% of~~ its Firm Load, the customer shall be required to subject to all four (4) of the following: (i) forfeit all its Program Credits for the month in which the Emergency Curtailment Event occurred; (ii) pay the ECE Charge set forth in the Rates section of this Rider; (iii) pay the sum of all Program Credits received by the customer under the Program during the immediately preceding twelve billing months which shall include credits from under this Rider and the Economic Development Rider Interruptible Credit Provision during the current month in which the Emergency Curtailment Event occurred and the preceding twelve months associated with the uninterrupted demand. The uninterrupted demand will be calculated as the difference between the maximum 30-minute actual measured load during the Emergency Curtailment Event and the Firm Load. ; and (iv) The Company's also has the right, at its sole discretion, to remove the customer from the Program for a minimum of 12 months.

~~If at any time during the Emergency Curtailment Event a customer's actual measured load is greater than 100% and less than or equal to 110% of its Firm Load during the Emergency Curtailment Event, the customer shall forfeit its Program Credit for the month in which the Emergency Curtailment Event occurred and shall pay the ECE Charge set forth in the Rates section of this Rider.~~

~~In no event shall the penalties for non-performance listed above be less than PJM's non-performance penalties plus ECE charge for a non-performing customer during the Emergency Curtailment Event.~~

~~In a PJM delivery year (June 1st — May 31st) when an Emergency Curtailment Event has not been requested of customers by PJM on the Rider between June 1 and May 7, T~~he Company shall conduct at least one test event per year -simultaneously to simultaneously interrupt all customers on this Rider by May 31 in order to meet the Company's PJM test obligations for Load Management Resources. The Company will schedule the test and Customers shall receive advance notification of the test. All provisions of this Rider shall apply to this test. Customers who select their own CSP and participate in PJM demand response programs may satisfy their annual testing requirement through PJM and would not be subject to the Company's annual testing.

In the event of any conflict between the terms and conditions set forth in this Rider and other service reliability requirements and/or obligations of the Company, the latter shall prevail.

RIDER ELR
Economic Load Response Program Rider

E. Notification

Emergency Curtailment Event notifications called by PJM will be stated such that customers must curtail their actual measured load to Firm Load prior to the start time of the Emergency Curtailment Event set forth in the PJM notification to the Company. Emergency Curtailment Event notifications called for either by the Company or a transmission operator will be stated such that customers must curtail actual measured load to Firm Load within two hours of the time the Company sends such notification to the customer. The Company will provide customers a notification of when Emergency Curtailment Events have ended. Receipt of notifications set out in this paragraph shall be the sole responsibility of the customer.

Notification of an Emergency Curtailment Event consists of an electronic message issued by the Company to a device or devices such as telephone, text, facsimile, pager or email, selected and provided by the customer and approved by the Company. Two-way information capability shall be incorporated by the Company and the customer in order to provide confirmation of receipt of notification messages. Operation, maintenance and functionality of such communication devices selected by the customer shall be the sole responsibility of the customer.

F. Term

This Rider shall become effective for service rendered beginning on the effective date of this tariff and shall expire with service rendered through the term of the Company's Electric Security Plan in Case No. ~~1425-00921297~~-EL-SSO.

~~A customer may terminate its participation in the Program consistent with other terms and conditions to be effective June 1st, so long as the customer who has not selected a CSP provides written notice to the Company no less than 38 months prior to the requested June 1st date upon which the requested termination would become effective. Except as otherwise provided in this Rider, a qualifying customer may return to the Program after a hiatus from the Program of at least one (1) year on the first day of the customer's billing cycle upon at least thirty days prior written notice of the customer's intent to return.~~

G. Conditions

Payment by the customer of all charges herein is a condition of service under this Economic Load Response Program Rider.

RIDER ELR
Economic Load Response Program Rider

APPLICABILITY:

This Economic Load Response Program Rider ("Program") is available to customers taking service from the Company at primary voltages or higher voltages provided that all of the following ~~sixfour~~ conditions are met at the time of initiation of service to the customer under this Rider and on a continuing basis thereafter: (i) the customer took service under the Program as of ~~[DATE]2016 or the customer was historically eligible for Rider ELR and provided written notice of intent to participate in the Program on or before May 31, 2015 for up to an additional 136,250 kW of Curtailable Load effective on or after June 1, 2016;~~ (ii) the customer can ~~satisfy all requirements of this tariff successfully demonstrate to the Company that it can reduce its measured load to a pre-established contract Firm Load (as defined under Other Provisions, paragraph A., below) within two hours of notification provided by the Company without the need of a generator (A customer may intend to use a generator to reduce its usage to or below its Firm Load, but if the generator does not operate, the customer must still reduce its usage to or below its Firm Load. Failure of a customer to reduce its usage to or below its Firm Load shall result in the consequences listed in the Emergency Curtailment Event Section herein.);~~ (iii) the customer executes the Company's standard Program contract; ~~and~~ (iv) the customer is taking generation service from the Company or a Competitive Retail Electric Service ("CRES") provider using consolidated billing; ~~(v) the customer commits its demand response capability to Company for integration into Company's R.C. § 4928.66 compliance programs; and (vi) the Commission finds that the demand response capabilities of customers electing service under this rider shall count towards the Company's compliance with the peak demand reduction benchmarks set forth in R.C. § 4928.66 as applied by the Commission's applicable rules and regulations and shall be considered incremental to interruptible load on the Company's system that existed in 2008. Nothing herein shall preclude a customer from requesting and receiving an exemption from any mechanism designed to recover the cost of energy efficiency and peak demand reduction programs to the extent the exemption is requested to reasonably encourage the commitment of customer-sited capabilities to the Company.~~

A customer may elect to participate in a demand response program offered by PJM Interconnection, L.L.C. ("PJM"); with a Competitive Service Provider ("CSP"), after the ~~2024/2025~~~~[DATE]~~ planning year. Such customers must notify the Company that they have entered into a contract with a CSP prior to the effective date of this tariff, and the Company will no longer serve as the customer's CSP. All terms and conditions of this rider will continue to apply.

RATES:

In addition to any other charges under any other rate schedules applicable to customer's service, customers participating in the Program shall also pay the charges and receive the credit set forth below:

Charges:

Program Administrative Charge: \$150.00 per month

~~**ECE Charge:**~~

~~During an Emergency Curtailment Event (as defined under Other Provisions, paragraph D., below), the portion of the customer's actual measured load that exceeds its pre-established contract Firm Load for any and all hours during such event shall be assessed an ECE Charge~~

RIDER ELR
Economic Load Response Program Rider

~~which is calculated for each hour of the event as follows. Revenue collected by the Company as a result of any ECE Charge less amounts associated with the Commercial Activity Tax ("CAT") (as defined below) shall be credited towards costs to be collected through the DSE1 charge of Rider DSE:~~

~~$$\text{ECE Charge} = (\text{AL} \times \text{PJM LMP} \times 300\%) \times (1 + \text{LAF}) \times \left[\frac{1}{(1 - \text{CAT})} \right]$$~~

~~Where:~~

~~AL = the customer's actual hourly load during an Emergency Curtailment Event that exceeds the customer's pre-established contract Firm Load.~~

~~PJM LMP = the final Real-Time Locational Marginal Price as defined and specified by PJM at the appropriate pricing node during the applicable hour(s).~~

~~CAT = the Commercial Activity Tax rate as established in Section 5751.03 of the Ohio Revised Code.~~

~~LAF = Loss Adjustment Factor
3.0% for primary voltages
0.1% for subtransmission voltages
0.0% for transmission voltages~~

Program Credit ("PC"):

Customers taking service under this Rider shall receive a monthly Program Credit which shall be calculated as follows:

$$\text{PC} = \text{CL} \times (\$45.00) / \text{kW/month}$$

Where:

CL is the Curtailable Load, which shall be calculated by the Company for each customer by subtracting the customer's contract Firm Load from its monthly highest thirty (30) minute integrated kW load occurring during the non-holiday weekday hours of 11 a.m. to 5 p.m. Eastern Standard Time (equivalent to noon to 6 p.m. EDT). In no circumstance can the CL be negative nor can the CL be in excess of a contract amount determined based upon the customer's 12 month history as of February 1, 2008. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day. If a Customer chooses to participate with a CSP other than the Company, the Program Credit will be reduced by \$1.00 per kW-month.

RIDER ELR
Economic Load Response Program Rider

Minimum Bill:

The application of the Program Credit shall not produce a total monthly bill for any customer, after including the effects of all rate schedules, riders, and if applicable, the CRES consolidated billing, that results in an average price per kWh less than two (2) cents per kWh.

OTHER PROVISIONS:

A. Firm Load

For purposes of this Rider, "Firm Load" shall be that portion of a customer's electric load that is not subject to curtailment, and for customers electing a CSP, shall be equal to the level registered for participation in PJM demand response programs. ~~Customers will have an opportunity to annually reset their firm service levels. A customer may request a reduction to its contract Firm Load no more than once in any twelve month period. The Firm Load may be reduced to the extent that such reduction is consistent with other terms and conditions set forth in this Rider. Any such change in Firm Load shall be applied beginning with the customer's January bill immediately following the year in which the change has been approved by the Company, provided that advance written request is provided to the Company no less than thirty (30) days prior to the effective billing month of the change. The Company may increase the Firm Load at any time if the Company, at its sole discretion, determines the Firm Load is at a level that the customer fails to demonstrate that they can reach. The Company shall promptly notify the customer of any such change.~~

B. Load Response Program Contract

Customers taking service under this optional Rider shall execute the Company's standard Program contract which, among other things, will confirm the Customer's participation in a demand response program offered by PJM as applicable, establish the Customer's Firm Load as described above, and commit the Customer's demand response capability to the Company ~~for purposes of Company's compliance with the peak demand reduction benchmarks set forth in R.C. §4928.66 as applied by the Commission's applicable rules and regulations~~, unless the Customer is participating through a CSP.

C. Metering

The customer must arrange for interval metering consistent with the Company's Miscellaneous Charges, Tariff Sheet 75.

RIDER ELR
Economic Load Response Program Rider

D. Emergency Curtailment Event

Upon advance notification provided by the Company, a customer taking service under this Rider must curtail all load above its Firm Load during an Emergency Curtailment Event consistent with the Company's instructions. For purposes of this Rider, an Emergency Curtailment Event shall be one in which the Company, a regional transmission organization and/or a transmission operator determines, in its respective sole discretion, that an emergency situation exists that may jeopardize the integrity of either the distribution or transmission system in the area. PJM, which is the regional transmission organization of which the Company is a member, may also initiate an Emergency Curtailment Event upon their sole determination that a pre-emergency situation exists.

If an Emergency Curtailment Event is requested solely by the Company or a transmission operator, a customer will be given no less two hours advance notification to curtail all load above its Firm Load during the Emergency Curtailment Event. An Emergency Curtailment Event requested solely by the Company may occur anytime during the year with no restrictions on the number of events or the duration of an event.

If the Emergency Curtailment Event is requested by PJM, a customer will be notified by the Company of the start time of the Emergency Curtailment Event as determined by PJM. The start time of the Emergency Curtailment Event will be approximately thirty (30) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. However, PJM at its sole discretion may grant a customer an exception to the thirty (30) minute advance notification time of either sixty (60) minutes or one hundred and twenty (120) minutes based on the customer's physical capability to provide load reduction. A customer wishing to seek such exception must submit to the Company a completed request form that the Company will then submit to PJM. If PJM approves the customer request for an exception for sixty (60) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately sixty (60) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. If PJM approves the customer request for an exception for one hundred and twenty (120) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately one hundred and twenty (120) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. The maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM during the months of May through October will be twelve (12) hours and will only occur between 10:00 AM to 10:00 PM (Eastern Prevailing Time). For the months of November through April, the maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM will be fifteen (15) hours and will only occur between 6:00 AM to 9:00 PM (Eastern Prevailing Time). An Emergency Curtailment Event requested solely by PJM may occur any day during the year with no restrictions on the number of events that could occur.

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During the entire period of an Emergency Curtailment Event, the customer's actual measured load must remain at or below its Firm Load with such load being measured every clock half hour. A customer's actual measured load shall be determined using the greater of the customer's highest lagging kVA or highest kW during the Emergency Curtailment Event.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds its contract Firm Load, the Company may disconnect the customer ~~from the transmission system~~ for the duration of the Emergency Curtailment Event, at the customer's expense. The Company shall not be liable for any direct or indirect costs, losses, expenses, or other damages, special or otherwise, including, without limitation, lost profits that arise from such disconnection.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds ~~110% of~~ its Firm Load, the customer shall be ~~required to~~ subject to all four of the following: (i) forfeit all its Program Credit for the month in which the Emergency Curtailment Event occurred; (ii) pay the ECE Charge set forth in the Rates section of this Rider; (iii) pay the sum of all Program Credits received by the customer under the Program during the immediately preceding twelve billing months which shall include credits from under this Rider and the Economic Development Rider Interruptible Credit Provision during the current month in which the Emergency Curtailment Event occurred and the preceding twelve months associated with the uninterrupted demand. The uninterrupted demand will be calculated as the difference between the maximum 30-minute actual measured load during the Emergency Curtailment Event and the Firm Load.; and (iv)† The Company's also has the right, at its sole discretion, to remove the customer from the Program for a minimum of 12 months.

~~If at any time during the Emergency Curtailment Event a customer's actual measured load is greater than 100% and less than or equal to 110% of its Firm Load during the Emergency Curtailment Event, the customer shall forfeit its Program Credit for the month in which the Emergency Curtailment Event occurred and shall pay the ECE Charge set forth in the Rates section of this Rider.~~

~~In no event shall the penalties for non-performance listed above be less than PJM's non-performance penalties plus ECE charge for a non-performing customer during the Emergency Curtailment Event.~~

~~In a PJM delivery year (June 1st — May 31st) when an Emergency Curtailment Event has not been requested of customers by PJM on the Rider between June 1 and May 7, †The Company shall conduct at least one test event per year simultaneously to simultaneously interrupt all customers on this Rider, by May 31 in order to meet the Company's PJM test obligations for Load Management Resources.— The Company will schedule the test and Customers shall receive advance notification of the test. All provisions of this Rider shall apply to this test. Customers who select their own CSP and participate in PJM demand response programs may satisfy their annual testing requirement through PJM and would not be subject to the Company's annual testing.~~

In the event of any conflict between the terms and conditions set forth in this Rider and other service reliability requirements and/or obligations of the Company, the latter shall prevail.

RIDER ELR
Economic Load Response Program Rider

E. Notification

Emergency Curtailment Event notifications called by PJM will be stated such that customers must curtail their actual measured load to Firm Load prior to the start time of the Emergency Curtailment Event set forth in the PJM notification to the Company. Emergency Curtailment Event notifications called for either by the Company or a transmission operator will be stated such that customers must curtail actual measured load to Firm Load within two hours of the time the Company sends such notification to the customer. The Company will provide customers a notification of when Emergency Curtailment Events have ended. Receipt of notifications set out in this paragraph shall be the sole responsibility of the customer.

Notification of an Emergency Curtailment Event consists of an electronic message issued by the Company to a device or devices such as telephone, text, facsimile, pager or email, selected and provided by the customer and approved by the Company. Two-way information capability shall be incorporated by the Company and the customer in order to provide confirmation of receipt of notification messages. Operation, maintenance and functionality of such communication devices selected by the customer shall be the sole responsibility of the customer.

F. Term

This Rider shall become effective for service rendered beginning on the effective date of this tariff and shall expire with service rendered through the term of the Company's Electric Security Plan in Case No. ~~14-129725-0092~~-EL-SSO.

~~A customer may terminate its participation in the Program consistent with other terms and conditions to be effective June 1st, so long as the customer who has not selected a CSP provides written notice to the Company no less than 38 months prior to the requested June 1st date upon which the requested termination would become effective. Except as otherwise provided in this Rider, a qualifying customer may return to the Program after a hiatus from the Program of at least one (1) year on the first day of the customer's billing cycle upon at least thirty days prior written notice of the customer's intent to return.~~

G. Conditions

Payment by the customer of all charges herein is a condition of service under this Economic Load Response Program Rider.

RIDER ELR
Economic Load Response Program Rider

APPLICABILITY:

This Economic Load Response Program Rider ("Program") is available to customers taking service from the Company at primary voltages or higher voltages provided that all of the following ~~sixfour~~ conditions are met at the time of initiation of service to the customer under this Rider and on a continuing basis thereafter: (i) the customer took service under the Program as of ~~[DATE] May 31, 2016 or the customer was historically eligible for Rider ELR and provided written notice of intent to participate in the Program on or before May 31, 2015 for up to an additional 136,250 kW of Curtailable Load effective on or after June 1, 2016;~~ (ii) the customer can ~~satisfy all requirements of this tariff~~ ~~successfully demonstrate to the Company that it can reduce its measured load to a pre-established contract Firm Load (as defined under Other Provisions, paragraph A., below) within two hours of notification provided by the Company without the need of a generator (A customer may intend to use a generator to reduce its usage to or below its Firm Load, but if the generator does not operate, the customer must still reduce its usage to or below its Firm Load. Failure of a customer to reduce its usage to or below its Firm Load shall result in the consequences listed in the Emergency Curtailment Event Section herein.);~~ (iii) the customer executes the Company's standard Program contract; ~~and~~ (iv) the customer is taking generation service from the Company or a Competitive Retail Electric Service ("CRES") provider using consolidated billing; ~~(v) the customer commits its demand response capability to Company for integration into Company's R.C. § 4928.66 compliance programs; and (vi) the Commission finds that the demand response capabilities of customers electing service under this rider shall count towards the Company's compliance with the peak demand reduction benchmarks set forth in R.C. § 4928.66 as applied by the Commission's applicable rules and regulations and shall be considered incremental to interruptible load on the Company's system that existed in 2008. Nothing herein shall preclude a customer from requesting and receiving an exemption from any mechanism designed to recover the cost of energy efficiency and peak demand reduction programs to the extent the exemption is requested to reasonably encourage the commitment of customer sited capabilities to the Company.~~

A customer may elect to participate in a demand response program offered by PJM Interconnection, L.L.C. ("PJM"); with a Competitive Service Provider ("CSP"), after the ~~2024/2025~~ ~~[DATE]~~ planning year. Such customers must notify the Company that they have entered into a contract with a CSP prior to the effective date of this tariff, and the Company will no longer serve as the customer's CSP. All terms and conditions of this rider will continue to apply.

RATES:

In addition to any other charges under any other rate schedules applicable to customer's service, customers participating in the Program shall also pay the charges and receive the credit set forth below:

Charges:

Program Administrative Charge: \$150.00 per month

ECE Charge:

~~During an Emergency Curtailment Event (as defined under Other Provisions, paragraph D., below), the portion of the customer's actual measured load that exceeds its pre-established contract Firm Load for any and all hours during such event shall be assessed an ECE Charge~~

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~~which is calculated for each hour of the event as follows. Revenue collected by the Company as a result of any ECE Charge less amounts associated with the Commercial Activity Tax ("CAT") (as defined below) shall be credited towards costs to be collected through the DSE1 charge of Rider DSE.~~

$$\text{ECE Charge} = (\text{AL} \times \text{PJM LMP} \times 300\%) \times (1 + \text{LAF}) \times \{1/(1 - \text{CAT})\}$$

Where:

~~AL~~ = the customer's actual hourly load during an Emergency Curtailment Event that exceeds the customer's pre-established contract Firm Load.

~~PJM LMP~~ = the final Real-Time Locational Marginal Price as defined and specified by PJM at the appropriate pricing node during the applicable hour(s).

~~CAT~~ = the Commercial Activity Tax rate as established in Section 5751.03 of the Ohio Revised Code.

~~LAF~~ = Loss Adjustment Factor
3.0% for primary voltages
0.1% for subtransmission voltages
0.0% for transmission voltages

Program Credit ("PC"):

Customers taking service under this Rider shall receive a monthly Program Credit which shall be calculated as follows:

$$\text{PC} = \text{CL} \times (\$45.00) / \text{kW/month}$$

Where:

CL is the Curtailable Load, which shall be calculated by the Company for each customer by subtracting the customer's contract Firm Load from its monthly highest thirty (30) minute integrated kW load occurring during the non-holiday weekday hours of 11 a.m. to 5 p.m. Eastern Standard Time (equivalent to noon to 6 p.m. EDT). In no circumstance can the CL be negative nor can the CL be in excess of a contract amount determined based upon the customer's 12 month history as of February 1, 2008. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day. If a Customer chooses to participate with a CSP other than the Company, the Program Credit will be reduced by \$1.00 per kW-month.

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Minimum Bill:

The application of the Program Credit shall not produce a total monthly bill for any customer, after including the effects of all rate schedules, riders, and if applicable, the CRES consolidated billing, that results in an average price per kWh less than two (2) cents per kWh.

OTHER PROVISIONS:

A. Firm Load

For purposes of this Rider, "Firm Load" shall be that portion of a customer's electric load that is not subject to curtailment, and for customers electing a CSP, shall be equal to the level registered for participation in PJM demand response programs. ~~Customers will have an opportunity to annually reset their firm service levels. A customer may request a reduction to its contract Firm Load no more than once in any twelve month period. The Firm Load may be reduced to the extent that such reduction is consistent with other terms and conditions set forth in this Rider. Any such change in Firm Load shall be applied beginning with the customer's January bill immediately following the year in which the change has been approved by the Company, provided that advance written request is provided to the Company no less than thirty (30) days prior to the effective billing month of the change. The Company may increase the Firm Load at any time if the Company, at its sole discretion, determines the Firm Load is at a level that the customer fails to demonstrate that they can reach. The Company shall promptly notify the customer of any such change.~~

B. Load Response Program Contract

Customers taking service under this optional Rider shall execute the Company's standard Program contract which, among other things, will confirm the Customer's participation in a demand response program offered by PJM as applicable, establish the Customer's Firm Load as described above, and commit the Customer's demand response capability to the Company ~~for purposes of Company's compliance with the peak demand reduction benchmarks set forth in R.C. §4928.66 as applied by the Commission's applicable rules and regulations~~, unless the Customer is participating through a CSP.

C. Metering

The customer must arrange for interval metering consistent with the Company's Miscellaneous Charges, Tariff Sheet 75.

RIDER ELR
Economic Load Response Program Rider

D. Emergency Curtailment Event

Upon advance notification provided by the Company, a customer taking service under this Rider must curtail all load above its Firm Load during an Emergency Curtailment Event consistent with the Company's instructions. For purposes of this Rider, an Emergency Curtailment Event shall be one in which the Company a regional transmission organization and/or a transmission operator determines, in its respective sole discretion, that an emergency situation exists that may jeopardize the integrity of either the distribution or transmission system in the area. PJM, which is the regional transmission organization of which the Company is a member, may also initiate an Emergency Curtailment Event upon their sole determination that a pre-emergency situation exists.

If an Emergency Curtailment Event is requested solely by the Company or a transmission operator, a customer will be given no less two hours advance notification to curtail all load above its Firm Load during the Emergency Curtailment Event. An Emergency Curtailment Event requested solely by the Company may occur anytime during the year with no restrictions on the number of events or the duration of an event.

If the Emergency Curtailment Event is requested by PJM, a customer will be notified by the Company of the start time of the Emergency Curtailment Event as determined by PJM. The start time of the Emergency Curtailment Event will be approximately thirty (30) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. However, PJM at its sole discretion may grant a customer an exception to the thirty (30) minute advance notification time of either sixty (60) minutes or one hundred and twenty (120) minutes based on the customer's physical capability to provide load reduction. A customer wishing to seek such exception must submit to the Company a completed request form that the Company will then submit to PJM. If PJM approves the customer request for an exception for sixty (60) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately sixty (60) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. If PJM approves the customer request for an exception for one hundred and twenty (120) minutes, then the start time of any PJM-called Emergency Curtailment Events for that customer will be approximately one hundred and twenty (120) minutes from the time the Company receives notification from PJM of the Emergency Curtailment Event. The maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM during the months of May through October will be twelve (12) hours and will only occur between 10:00 AM to 10:00 PM (Eastern Prevailing Time). For the months of November through April, the maximum duration that load must be curtailed when an Emergency Curtailment Event is called by PJM will be fifteen (15) hours and will only occur between 6:00 AM to 9:00 PM (Eastern Prevailing Time). An Emergency Curtailment Event requested solely by PJM may occur any day during the year with no restrictions on the number of events that could occur.

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During the entire period of an Emergency Curtailment Event, the customer's actual measured load must remain at or below its Firm Load with such load being measured every clock half hour. A customer's actual measured load shall be determined using the greater of the customer's highest lagging kVA or highest kW during the Emergency Curtailment Event.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds its contract Firm Load, the Company may disconnect the customer ~~from the transmission system~~ for the duration of the Emergency Curtailment Event, at the customer's expense. The Company shall not be liable for any direct or indirect costs, losses, expenses, or other damages, special or otherwise, including, without limitation, lost profits that arise from such disconnection.

If at any time during the Emergency Curtailment Event a customer's actual measured load exceeds ~~110%~~ of its Firm Load, the customer shall be ~~required to~~ subject to all four of the following: (i) forfeit all its Program Credit for the month in which the Emergency Curtailment Event occurred; (ii) pay the ECE Charge set forth in the Rates section of this Rider; (iii) pay the sum of all Program Credits received by the customer under the Program during the immediately preceding twelve billing months which shall include credits from under this Rider and the Economic Development Rider Interruptible Credit Provision during the current month in which the uninterrupted demand. The uninterrupted demand will be calculated as the difference between the maximum 30 minute actual measured load during the Emergency Curtailment Event and the Firm Load.; ~~and (iv) t~~he Company's also has the right, at its sole discretion, to remove the customer from the Program for a minimum of 12 months.

~~If at any time during the Emergency Curtailment Event a customer's actual measured load is greater than 100% and less than or equal to 110% of its Firm Load during the Emergency Curtailment Event, the customer shall forfeit its Program Credit for the month in which the Emergency Curtailment Event occurred and shall pay the ECE Charge set forth in the Rates section of this Rider.~~

~~In no event shall the penalties for non-performance listed above be less than PJM's non-performance penalties plus ECE charge for a non-performing customer during the Emergency Curtailment Event.~~

~~In a PJM delivery year (June 1st – May 31st) when an Emergency Curtailment Event has not been requested of customers by PJM on the Rider between June 1 and May 7, t~~he Company shall conduct at least one test event per year simultaneously to simultaneously interrupt all customers on this Rider, by May 31 in order to meet the Company's PJM test obligations for Load Management Resources. The Company will schedule the test and Customers shall receive advance notification of the test. All provisions of this Rider shall apply to this test. Customers who select their own CSP and participate in PJM demand response programs may satisfy their annual testing requirement through PJM and would not be subject to the Company's annual testing.

In the event of any conflict between the terms and conditions set forth in this Rider and other service reliability requirements and/or obligations of the Company, the latter shall prevail.

RIDER ELR
Economic Load Response Program Rider

E. Notification

Emergency Curtailment Event notifications called by PJM will be stated such that customers must curtail their actual measured load to Firm Load prior to the start time of the Emergency Curtailment Event set forth in the PJM notification to the Company. Emergency Curtailment Event notifications called for either by the Company or a transmission operator will be stated such that customers must curtail actual measured load to Firm Load within two hours of the time the Company sends such notification to the customer. The Company will provide customers a notification of when Emergency Curtailment Events have ended. Receipt of notifications set out in this paragraph shall be the sole responsibility of the customer.

Notification of an Emergency Curtailment Event consists of an electronic message issued by the Company to a device or devices such as telephone, text, facsimile, pager or email, selected and provided by the customer and approved by the Company. Two-way information capability shall be incorporated by the Company and the customer in order to provide confirmation of receipt of notification messages. Operation, maintenance and functionality of such communication devices selected by the customer shall be the sole responsibility of the customer.

F. Term

This Rider shall become effective for service rendered beginning on the effective date of this tariff and shall expire with service rendered through the term of the Company's Electric Security Plan in Case No. ~~14-129725-0092~~-EL-SSO.

~~A customer may terminate its participation in the Program consistent with other terms and conditions to be effective June 1st, so long as the customer who has not selected a CSP provides written notice to the Company no less than 38 months prior to the requested June 1st date upon which the requested termination would become effective. Except as otherwise provided in this Rider, a qualifying customer may return to the Program after a hiatus from the Program of at least one (1) year on the first day of the customer's billing cycle upon at least thirty days prior written notice of the customer's intent to return.~~

G. Conditions

Payment by the customer of all charges herein is a condition of service under this Economic Load Response Program Rider.

RIDER DSE
Demand Side Management and Energy Efficiency Rider

The Company reserves the right to revise such schedule consistent with the Commission's final rules, which may include modification or deletion of all or portions of this schedule.

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. The following charges will apply, by rate schedule, effective for service rendered beginning ~~February 1, 2025~~[DATE], for all kWhs per kWh:

<u>RATE:</u>	<u>DSE1</u>	<u>DSE2</u>
RS	0. 0000 1151 ¢	0.0000¢
GS	0. 0000 1151 ¢	0.0000¢
GP	0. 0000 1151 ¢	0.0000¢
GSU	0. 0000 1151 ¢	0.0000¢
GT	0. 0000 1151 ¢	0.0000¢
STL	0. 0000 1151 ¢	0.0000¢
TRF	0. 0000 1151 ¢	0.0000¢
POL	0. 0000 1151 ¢	0.0000¢

PROVISIONS:

1. The DSE1 charges set forth in this Rider recover costs incurred by the Company associated with customers taking service under the Economic Load Response Rider (ELR) ~~through~~ [DATE].
2. The DSE2 charges set forth in this Rider recover costs incurred by the Company associated with the programs that may be implemented by the Company to secure compliance with the energy efficiency and peak demand reduction requirements in Section 4928.66, Revised Code through demand-response programs, energy efficiency programs, peak demand reduction programs, and self-directed demand-response, energy efficiency or other customer-sited programs. The costs initially deferred by the Company and subsequently fully recovered through this Rider will be all program costs, including but not limited to any customer incentives or rebates paid, applicable carrying costs, all reasonable administrative costs to conduct such programs, lost distribution revenues resulting from the implementation of such programs, and any performance incentives such as shared savings.

RIDER UPDATES:

1. The DSE1 charges set forth in this Rider shall be updated semi-annually. No later than December 1st and June 1st of each year, the Company shall file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st and July 1st of each year.

RIDER DSE
Demand Side Management and Energy Efficiency Rider

2. The DSE2 charges set forth in this Rider shall be updated and reconciled semi-annually. No later than December 1st and June 1st of each year, the Company shall file with the PUCO a request for approval of these charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st and July 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission in accordance with the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO and upon the Commission's orders in Case No. 18-47-AU-COI. This rider shall be in effect until all costs are fully recovered.

AVOIDABILITY:

1. The DSE1 charges set forth in this Rider are avoidable for (1) those customers taking service under Rider ELR and (2) a customer, as that term is defined in Section 4928.6610, Revised Code, which elects to opt out of the Company's portfolio plan as that term is defined in Section 4928.6610, Revised Code.
2. The DSE2 charges set forth in this Rider are avoidable for (1) a customer, as that term is defined in Section 4928.6610, Revised Code, which elects to opt out of the Company's portfolio plan as that term is defined in Section 4928.6610, Revised Code and (2) Non-Residential customers who are not taking service under a unique arrangement (special contract) and meet the criteria of all of paragraphs a) through f) below.

Each customer applying to the Company to avoid the DSE2 charges must at a minimum meet all of the criteria set forth below and must submit to the Company verifiable information detailing how the criteria are met, and must provide an affidavit from a company official attesting to the accuracy and truthfulness of the information provided. Qualification and verification on an annual basis is required, subject to the Failure to Comply section of this rider.

- a) The customer is a mercantile customer, as that term is defined in Section 4928.01, Revised Code.
- b) The customer identifies its capital investments and expenses related to customer-sited demand-response programs, energy efficiency programs or peak demand reduction programs.
- c) For consideration of avoidance of this Rider, the customer shall provide sufficient data to illustrate that it has undertaken or will undertake energy efficiency and/or demand reduction programs that have produced or will produce energy savings and/or peak demand reductions equal to or greater than the statutory benchmarks to which the Company is subject. The energy savings and demand reductions resulting from the customer's programs shall be calculated using the same methodology used to calculate the Company's energy savings and demand reductions for purposes of determining compliance with statutory benchmarks, including normalization adjustments to the baseline, where appropriate.
- d) The customer commits, in writing, its customer-sited capabilities for integration into the Company's portfolio of programs such that the customer-sited capabilities shall assist the Company in satisfying the requirements in Section 4928.66, Revised Code.
- e) The customer demonstrates to the satisfaction of the Company that the avoidance of the DSE2 charges shall reasonably encourage the customer to commit its customer-sited capabilities for integration into the Company's portfolio of programs described above.
- f) The customer commits to use its best efforts to cooperate with and assist the Company in conjunction with any reviews conducted by a regulatory authority of the Company's efforts to utilize the customer's customer-sited capabilities to satisfy the requirements in Section 4928.66, Revised Code.

RIDER DSE
Demand Side Management and Energy Efficiency Rider

The customer must complete a standard application form in order to be considered for qualification to avoid charges under this Rider. The Company shall provide a standard application form upon request by the customer. Customers applying to avoid the DSE2 charges must successfully demonstrate that they have completed an energy efficiency project within the past three calendar years without financial support from the Company. The burden of proof to successfully demonstrate compliance with the standard application form lies with the customer.

Upon the Commission's approval of the customer's completed standard application form, the DSE2 charges shall be avoidable by the customer as long as, on an annual basis, the customer makes a filing with the Commission demonstrating that it remains eligible for the exemption under the criteria set forth herein.

REPORTING REQUIREMENTS:

Customers served under this Rider must submit an annual report to the Company (Director, Ohio Rates and Regulatory Affairs), no later than April 30th of each year. The format of that report shall be identical to the Standard Application Form such that a determination of the compliance with the eligibility criteria can be determined.

The burden of proof to demonstrate on-going compliance with this Rider lies with the customer.

CONFIDENTIALITY:

Customer information provided to demonstrate eligibility under this Rider, which has been identified as confidential, shall be treated as confidential by the Company. The name and address of customers eligible for the schedules, including eligible to avoid the DSE2 charges, shall be public information. The Public Utilities Commission of Ohio and its Staff shall have access to all customer and Company information related to service provided pursuant to this Rider for periodic and random audits.

FAILURE TO COMPLY:

If the customer being provided with service pursuant to this Rider fails to comply with any of the criteria for eligibility to avoid charges under this Rider, the Company will provide reasonable notice to the customer that the customer will pay all charges under this Rider. Furthermore, the Company shall charge the customer for the sum of all of the customer's avoided charges realized under this Rider, which the customer shall thus be obligated to pay.

RIDER DSE
Demand Side Management and Energy Efficiency Rider

The Company reserves the right to revise such schedule consistent with the Commission's final rules, which may include modification or deletion of all or portions of this schedule.

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. The following charges will apply, by rate schedule, effective for service rendered beginning ~~February 1, 2025~~[DATE], for all kWhs per kWh:

<u>RATE:</u>	<u>DSE1</u>	<u>DSE2</u>
RS	0. 0000 1151 ¢	0.0000¢
GS	0. 0000 1151 ¢	0.0000¢
GP	0. 0000 1151 ¢	0.0000¢
GSU	0. 0000 1151 ¢	0.0000¢
GT	0. 0000 1151 ¢	0.0000¢
STL	0. 0000 1151 ¢	0.0000¢
TRF	0. 0000 1151 ¢	0.0000¢
POL	0. 0000 1151 ¢	0.0000¢

PROVISIONS:

1. The DSE1 charges set forth in this Rider recover costs incurred by the Company associated with customers taking service under the Economic Load Response Rider (ELR) ~~through~~ [DATE].
2. The DSE2 charges set forth in this Rider recover costs incurred by the Company associated with the programs that may be implemented by the Company to secure compliance with the, energy efficiency and peak demand reduction requirements in Section 4928.66, Revised Code through demand-response programs, energy efficiency programs, peak demand reduction programs, and self-directed demand-response, energy efficiency or other customer-sited programs. The costs initially deferred by the Company and subsequently fully recovered through this Rider will be all program costs, including but not limited to any customer incentives or rebates paid, applicable carrying costs, all reasonable administrative costs to conduct such programs, lost distribution revenues resulting from the implementation of such programs, and any performance incentives such as shared savings.

RIDER UPDATES:

1. The DSE1 charges set forth in this Rider shall be updated semi-annually. No later than December 1st and June 1st of each year, the Company shall file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st and July 1st of each year.

RIDER DSE
Demand Side Management and Energy Efficiency Rider

2. The DSE2 charges set forth in this Rider shall be updated and reconciled semi-annually. No later than December 1st and June 1st of each year, the Company shall file with the PUCO a request for approval of these charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st and July 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission in accordance with the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO and upon the Commission's orders in Case No. 18-47-AU-COI. This rider shall be in effect until all costs are fully recovered.

AVOIDABILITY:

1. The DSE1 charges set forth in this Rider are avoidable for (1) those customers taking service under Rider ELR and (2) a customer, as that term is defined in Section 4928.6610, Revised Code, which elects to opt out of the Company's portfolio plan as that term is defined in Section 4928.6610, Revised Code.
2. The DSE2 charges set forth in this Rider are avoidable for (1) a customer, as that term is defined in Section 4928.6610, Revised Code, which elects to opt out of the Company's portfolio plan as that term is defined in Section 4928.6610, Revised Code and (2) Non-Residential customers who are not taking service under a unique arrangement (special contract) and meet the criteria of all of paragraphs a) through f) below.

Each customer applying to the Company to avoid the DSE2 charges must at a minimum meet all of the criteria set forth below and must submit to the Company verifiable information detailing how the criteria are met, and must provide an affidavit from a company official attesting to the accuracy and truthfulness of the information provided. Qualification and verification on an annual basis is required, subject to the Failure to Comply section of this rider.

- a) The customer is a mercantile customer, as that term is defined in Section 4928.01, Revised Code.
- b) The customer identifies its capital investments and expenses related to customer-sited demand-response programs, energy efficiency programs or peak demand reduction programs.
- c) For consideration of avoidance of this Rider, the customer shall provide sufficient data to illustrate that it has undertaken or will undertake energy efficiency and/or demand reduction programs that have produced or will produce energy savings and/or peak demand reductions equal to or greater than the statutory benchmarks to which the Company is subject. The energy savings and demand reductions resulting from the customer's programs shall be calculated using the same methodology used to calculate the Company's energy savings and demand reductions for purposes of determining compliance with statutory benchmarks, including normalization adjustments to the baseline, where appropriate.
- d) The customer commits, in writing, its customer-sited capabilities for integration into the Company's portfolio of programs such that the customer-sited capabilities shall assist the Company in satisfying the requirements in Section 4928.66, Revised Code.
- e) The customer demonstrates to the satisfaction of the Company that the avoidance of the DSE2 charges shall reasonably encourage the customer to commit its customer-sited capabilities for integration into the Company's portfolio of programs described above.
- f) The customer commits to use its best efforts to cooperate with and assist the Company in conjunction with any reviews conducted by a regulatory authority of the Company's efforts to utilize the customer's customer-sited capabilities to satisfy the requirements in Section 4928.66, Revised Code.

RIDER DSE
Demand Side Management and Energy Efficiency Rider

The customer must complete a standard application form in order to be considered for qualification to avoid charges under this Rider. The Company shall provide a standard application form upon request by the customer. Customers applying to avoid the DSE2 charges must successfully demonstrate that they have completed an energy efficiency project within the past three calendar years without financial support from the Company. The burden of proof to successfully demonstrate compliance with the standard application form lies with the customer.

Upon the Commission's approval of the customer's completed standard application form, the DSE2 charges shall be avoidable by the customer as long as, on an annual basis, the customer makes a filing with the Commission demonstrating that it remains eligible for the exemption under the criteria set forth herein.

REPORTING REQUIREMENTS:

Customers served under this Rider must submit an annual report to the Company (Director, Ohio Rates and Regulatory Affairs), no later than April 30th of each year. The format of that report shall be identical to the Standard Application Form such that a determination of the compliance with the eligibility criteria can be determined.

The burden of proof to demonstrate on-going compliance with this Rider lies with the customer.

CONFIDENTIALITY:

Customer information provided to demonstrate eligibility under this Rider, which has been identified as confidential, shall be treated as confidential by the Company. The name and address of customers eligible for the schedules, including eligible to avoid the DSE2 charges, shall be public information. The Public Utilities Commission of Ohio and its Staff shall have access to all customer and Company information related to service provided pursuant to this Rider for periodic and random audits.

FAILURE TO COMPLY:

If the customer being provided with service pursuant to this Rider fails to comply with any of the criteria for eligibility to avoid charges under this Rider, the Company will provide reasonable notice to the customer that the customer will pay all charges under this Rider. Furthermore, the Company shall charge the customer for the sum of all of the customer's avoided charges realized under this Rider, which the customer shall thus be obligated to pay.

RIDER DSE
Demand Side Management and Energy Efficiency Rider

The Company reserves the right to revise such schedule consistent with the Commission’s final rules, which may include modification or deletion of all or portions of this schedule.

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. The following charges will apply, by rate schedule, effective for service rendered beginning ~~February 1, 2025~~[DATE], for all kWhs per kWh:

<u>RATE:</u>	<u>DSE1</u>	<u>DSE2</u>
RS	0. 0000 1151 ¢	0.0000¢
GS	0. 0000 1151 ¢	0.0000¢
GP	0. 0000 1151 ¢	0.0000¢
GSU	0. 0000 1151 ¢	0.0000¢
GT	0. 0000 1151 ¢	0.0000¢
STL	0. 0000 1151 ¢	0.0000¢
TRF	0. 0000 1151 ¢	0.0000¢
POL	0. 0000 1151 ¢	0.0000¢

PROVISIONS:

1. The DSE1 charges set forth in this Rider recover costs incurred by the Company associated with customers taking service under the Economic Load Response Rider (ELR) ~~through~~ [DATE].
2. The DSE2 charges set forth in this Rider recover costs incurred by the Company associated with the programs that may be implemented by the Company to secure compliance with the, energy efficiency and peak demand reduction requirements in Section 4928.66, Revised Code through demand-response programs, energy efficiency programs, peak demand reduction programs, and self-directed demand-response, energy efficiency or other customer-sited programs. The costs initially deferred by the Company and subsequently fully recovered through this Rider will be all program costs, including but not limited to any customer incentives or rebates paid, applicable carrying costs, all reasonable administrative costs to conduct such programs, lost distribution revenues resulting from the implementation of such programs, and any performance incentives such as shared savings.

RIDER UPDATES:

1. The DSE1 charges set forth in this Rider shall be updated semi-annually. No later than December 1st and June 1st of each year, the Company shall file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st and July 1st of each year.

RIDER DSE
Demand Side Management and Energy Efficiency Rider

2. The DSE2 charges set forth in this Rider shall be updated and reconciled semi-annually. No later than December 1st and June 1st of each year, the Company shall file with the PUCO a request for approval of these charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st and July 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission in accordance with the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO and upon the Commission's orders in Case No. 18-47-AU-COI. This rider shall be in effect until all costs are fully recovered.

AVOIDABILITY:

1. The DSE1 charges set forth in this Rider are avoidable for (1) those customers taking service under Rider ELR and (2) a customer, as that term is defined in Section 4928.6610, Revised Code, which elects to opt out of the Company's portfolio plan as that term is defined in Section 4928.6610, Revised Code.
2. The DSE2 charges set forth in this Rider are avoidable for (1) a customer, as that term is defined in Section 4928.6610, Revised Code, which elects to opt out of the Company's portfolio plan as that term is defined in Section 4928.6610, Revised Code and (2) Non-Residential customers who are not taking service under a unique arrangement (special contract) and meet the criteria of all of paragraphs a) through f) below.

Each customer applying to the Company to avoid the DSE2 charges must at a minimum meet all of the criteria set forth below and must submit to the Company verifiable information detailing how the criteria are met, and must provide an affidavit from a company official attesting to the accuracy and truthfulness of the information provided. Qualification and verification on an annual basis is required, subject to the Failure to Comply section of this rider.

- a) The customer is a mercantile customer, as that term is defined in Section 4928.01, Revised Code.
- b) The customer identifies its capital investments and expenses related to customer-sited demand-response programs, energy efficiency programs or peak demand reduction programs.
- c) For consideration of avoidance of this Rider, the customer shall provide sufficient data to illustrate that it has undertaken or will undertake energy efficiency and/or demand reduction programs that have produced or will produce energy savings and/or peak demand reductions equal to or greater than the statutory benchmarks to which the Company is subject. The energy savings and demand reductions resulting from the customer's programs shall be calculated using the same methodology used to calculate the Company's energy savings and demand reductions for purposes of determining compliance with statutory benchmarks, including normalization adjustments to the baseline, where appropriate.
- d) The customer commits, in writing, its customer-sited capabilities for integration into the Company's portfolio of programs such that the customer-sited capabilities shall assist the Company in satisfying the requirements in Section 4928.66, Revised Code.
- e) The customer demonstrates to the satisfaction of the Company that the avoidance of the DSE2 charges shall reasonably encourage the customer to commit its customer-sited capabilities for integration into the Company's portfolio of programs described above.
- f) The customer commits to use its best efforts to cooperate with and assist the Company in conjunction with any reviews conducted by a regulatory authority of the Company's efforts to utilize the customer's customer-sited capabilities to satisfy the requirements in Section 4928.66, Revised Code.

RIDER DSE
Demand Side Management and Energy Efficiency Rider

The customer must complete a standard application form in order to be considered for qualification to avoid charges under this Rider. The Company shall provide a standard application form upon request by the customer. Customers applying to avoid the DSE2 charges must successfully demonstrate that they have completed an energy efficiency project within the past three calendar years without financial support from the Company. The burden of proof to successfully demonstrate compliance with the standard application form lies with the customer.

Upon the Commission's approval of the customer's completed standard application form, the DSE2 charges shall be avoidable by the customer as long as, on an annual basis, the customer makes a filing with the Commission demonstrating that it remains eligible for the exemption under the criteria set forth herein.

REPORTING REQUIREMENTS:

Customers served under this Rider must submit an annual report to the Company (Director, Ohio Rates and Regulatory Affairs), no later than April 30th of each year. The format of that report shall be identical to the Standard Application Form such that a determination of the compliance with the eligibility criteria can be determined.

The burden of proof to demonstrate on-going compliance with this Rider lies with the customer.

CONFIDENTIALITY:

Customer information provided to demonstrate eligibility under this Rider, which has been identified as confidential, shall be treated as confidential by the Company. The name and address of customers eligible for the schedules, including eligible to avoid the DSE2 charges, shall be public information. The Public Utilities Commission of Ohio and its Staff shall have access to all customer and Company information related to service provided pursuant to this Rider for periodic and random audits.

FAILURE TO COMPLY:

If the customer being provided with service pursuant to this Rider fails to comply with any of the criteria for eligibility to avoid charges under this Rider, the Company will provide reasonable notice to the customer that the customer will pay all charges under this Rider. Furthermore, the Company shall charge the customer for the sum of all of the customer's avoided charges realized under this Rider, which the customer shall thus be obligated to pay.

RIDER EDR
Economic Development Rider

a. Residential Non-Standard Credit Provision

APPLICABILITY:

Applicable to residential customers taking service under the Company's rate schedule RS to which the Company's Residential Distribution Credit Rider (RDC) applies. This Residential Non-Standard Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

RATE:

The following Residential Non-Standard credits are effective for service rendered beginning September 1, 2009, for all kWhs per kWh in excess of 500 kWhs per month which are consumed by the customer during the winter billing periods as defined in the Electric Service Regulations:

Customer rate schedule as of December 31, 2008

"Optional Load Management" section of Residential Standard (Original Sheet No. 10)	(1.9000)¢
Residential Add-On Heat Pump (Original Sheet No. 11)	(1.9000)¢
Residential Water Heating (Original Sheet No. 12)	(0.5000)¢
Residential Space Heating (Original Sheet No. 13)	(1.9000)¢
Residential Water Heating and Space Heating (Original Sheet No. 14)	(1.9000)¢
Optional Electrically Heated Residential Apartment Schedule (Original Sheet No. 15)	(1.9000)¢

b. Interruptible Credit Provision

APPLICABILITY:

Applicable to all customers taking service under the Company's Economic Load Response Program Rider (ELR).

RATE:

The following interruptible credits will apply, by rate schedule, effective for service rendered beginning ~~February 1, 2025~~[DATE] by unit of Curtailable Load, as defined in Rider ELR. If a customer chooses to participate with a CSP other than the Company, the program credit will be reduced by \$1.00 per kW-month.

GP (per kW)	\$ (45 .000)
GSU (per kW)	\$ (45 .000)
GT (per kW)	\$ (54 .000)

RIDER EDR
Economic Development Rider

c. Non-Residential Credit Provision

APPLICABILITY:

Applicable to any customer taking General Service - Transmission (GT), Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL) service under the Company's rate schedules. This Non-Residential Credit Provision is not applied during the period a customer takes electric generation service from a certified supplier.

RATE:

The following credits will apply, by rate schedule, effective for service rendered beginning ~~February 1, 2025~~[DATE], for all kWhs, per kWh:

GT	(0.0000)¢
STL	(0.0000)¢
TRF	(0.0000)¢
POL	(0.0000)¢

d. General Service — Transmission (Rate GT) Provision

APPLICABILITY:

~~Applicable to any customer taking service under the Company's General Service — Transmission (Rate GT). This provision is not avoidable for customers who take electric generation service from a certified supplier.~~

RATE:

~~The following charge will apply, effective for service rendered beginning February 1, 2025:~~

~~— GT (per kVA of billing demand) ————— \$0.0000~~

~~The following credit will apply, effective for service rendered beginning February 1, 2025:~~

~~— GT (all kWhs, per kWh) ————— (0.0000)¢~~

ADDITIONAL PROVISION:

~~The charges provided for by Section (d) of this Rider shall be applied to the greater of (i) the measured monthly on-peak demand, or (ii) 25% of the measure monthly off peak demand. Monthly on-peak demand is defined as the highest thirty (30) minute integrated kVA between the hours of 6:00 a.m. to 10:00 p.m. EST (equivalent to 7:00 a.m. to 11:00 p.m. EDT), Monday through Friday, excluding holidays. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. Monthly off peak demand is defined as the highest thirty (30) minute integrated kVA for all other hours. This provision of Rider EDR is reconciled within this subpart (d) quarterly and is revenue neutral to the Companies.~~

RIDER EDR
Economic Development Rider

e. Standard Charge Provision

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. This Standard Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:

The charges provided for by Section (e) of this Rider recover the difference in revenues resulting from the application of rates in the otherwise applicable rate schedule, and the application of credits in sections (a), (b), and (c) of this Rider.

RATE:

The following total charges will apply, by rate schedule for all kWhs per kWh:

	<u>Provision 1</u>	<u>Provision 2</u>	<u>Provision 3</u>	<u>Total</u>
RS	X.XXXX0.0000¢	X.XXXX0.0252¢	X.XXXX¢	X.XXXX0.0252¢
GS	X.XXXX0.2348¢	X.XXXX0.0197¢	X.XXXX¢	X.XXXX0.2545¢
GP	X.XXXX0.4158¢	X.XXXX0.0064¢	X.XXXX¢	X.XXXX0.4219¢
GSU	X.XXXX0.0000¢	X.XXXX0.0029¢	X.XXXX¢	X.XXXX0.0029¢
GT	X.XXXX0.0000¢	X.XXXX0.0007¢	X.XXXX¢	X.XXXX0.0007¢
STL	X.XXXX0.0000¢	X.XXXX0.0768¢	X.XXXX¢	X.XXXX0.0768¢
TRF	X.XXXX0.0000¢	X.XXXX0.0123¢	X.XXXX¢	X.XXXX0.0123¢
POL	X.XXXX0.0000¢	X.XXXX0.0978¢	X.XXXX¢	X.XXXX0.0978¢

~~f. Provision Expired~~

RIDER EDR
Economic Development Rider

g. Provision expired

h. Automaker Credit Provision

APPLICABILITY:

Applicable to domestic automaker facilities with more than 45 million kilowatt-hours of consumption for the 12 monthly billing periods ended December 31, 2009 at a single site. This Automaker Credit Provision is available for customers who take electric generation service from a certified supplier.

RATE:

All credits included in Section (h) of this Rider are applied only to usage that exceeds the average of the customer's twelve (12) billing periods ended December 31, 2009 ("Baseline Usage").

All kWhs over Baseline Usage, per kWh (1.0000)¢

i. Automaker Charge Provision

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules with the exception of General Service - Transmission (GT), Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL). This Automaker Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:

The charges provided for by Section (i) of this Rider recover costs associated with implementation of the Automaker Credit Provision.

RATE:

The following charge will apply effective for service rendered beginning ~~February 1, 2025~~[DATE], for all kWhs per kWh:

Automaker Charge 0.0022¢

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on a quarterly basis. No later than December 1st, March 1st, June 1st and September 1st of each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st, April 1st, July 1st and October 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission ~~in accordance with the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO.~~

RIDER EDR
Economic Development Rider

a. Residential Non-Standard Credit Provision

APPLICABILITY:

Applicable to residential customers taking service under the Company's rate schedule RS to which the Company's Residential Distribution Credit Rider (RDC) applies. This Residential Non-Standard Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

RATE:

The following Residential Non-Standard credits are effective for service rendered beginning September 1, 2009, for all kWhs per kWh in excess of 500 kWhs per month which are consumed by the customer during the winter billing periods as defined in the Electric Service Regulations:

Customer rate schedule as of December 31, 2008

"Special Provisions" of Residential Standard Rate Schedule (Original Sheet No. 10)	(0.0000)¢
Residential Space Heating Rate (Original Sheet No. 11)	(1.9000)¢
Residential Optional Time-of-Day (Original Sheet No. 12)	(1.9000)¢
Residential Optional Controlled Service Rider (Original Sheet No. 14)	(1.9000)¢
Residential Load Management Rate (Original Sheet No. 17)	(1.9000)¢
Residential Water Heating Service (Original Sheet No. 18)	(0.0000)¢
Residential Optional Electrically Heated Apartment Rate (Original Sheet No. 19)	(1.9000)¢

b. Interruptible Credit Provision

APPLICABILITY:

Applicable to all customers taking service under the Company's Economic Load Response Program Rider (ELR).

RATE:

The following interruptible credits will apply, by rate schedule, effective for service rendered beginning ~~February 1, 2025~~[DATE] by unit of Curtailable Load, as defined in Rider ELR. If a customer chooses to participate with a CSP other than the Company, the program credit will be reduced by \$1.00 per kW-month.

GP (per kW)	\$ (45.000)
GSU (per kW)	\$ (45.000)
GT (per kW)	\$ (45.000)

RIDER EDR
Economic Development Rider

c. Non Residential Credit Provision

APPLICABILITY:

Applicable to any customer taking General Service - Transmission (GT), Street Lighting (STL) and Traffic Lighting (TRF) service under the Company's rate schedules. This Non-Residential Credit Provision is not applied during the period a customer takes electric generation service from a certified supplier.

RATE:

The following credits will apply, by rate schedule, effective for service rendered beginning ~~February 1, 2025~~^[DATE], for all kWhs, per kWh:

GT	(0.0000)¢
STL	(0.0000)¢
TRF	(0.0000)¢
POL	(0.0000)¢

d. General Service—Transmission (Rate GT) Provision

APPLICABILITY:

~~Applicable to any customer taking service under the Company's General Service—Transmission (Rate GT). This provision is not avoidable for customers who take electric generation service from a certified supplier.~~

RATE:

~~The following charge will apply, effective for service rendered beginning February 1, 2025:~~

~~— GT (per kVA of billing demand) ————— \$0.0000~~

~~The following credit will apply, effective for service rendered beginning February 1, 2025:~~

~~GT (all kWhs, per kWh) ————— (0.0000)¢~~

ADDITIONAL PROVISION:

~~The charges provided for by Section (d) of this Rider shall be applied to the greater of (i) the measured monthly on-peak demand, or (ii) 25% of the measure monthly off-peak demand. Monthly on-peak demand is defined as the highest thirty (30) minute integrated kVA between the hours of 6:00 a.m. to 10:00 p.m. EST (equivalent to 7:00 a.m. to 11:00 p.m. EDT), Monday through Friday, excluding holidays. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. Monthly off-peak demand is defined as the highest thirty (30) minute integrated kVA for all other hours. This provision of Rider EDR is reconciled within this subpart (d) quarterly and is revenue neutral to the Companies.~~

RIDER EDR
Economic Development Rider

e. Standard Charge Provision

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. This Standard Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:

The charges provided for by Section (e) of this Rider recover the difference in revenues resulting from the application of rates in the otherwise applicable rate schedule, and the application of credits in sections (a), (b), and (c) of this Rider.

RATE:

The following total charges will apply, by rate schedule for all kWhs per kWh:

	<u>Provision 1</u>	<u>Provision 2</u>	<u>Provision 3</u>	<u>Total</u>
RS	<u>X.XXXX0.0000¢</u>	<u>X.XXXX0.0252¢</u>	<u>X.XXXX¢</u>	<u>X.XXXX0.0252¢</u>
GS	<u>X.XXXX0.2465¢</u>	<u>X.XXXX0.0197¢</u>	<u>X.XXXX¢</u>	<u>X.XXXX0.2662¢</u>
GP	<u>X.XXXX0.2413¢</u>	<u>X.XXXX0.0064¢</u>	<u>X.XXXX¢</u>	<u>X.XXXX0.2474¢</u>
GSU	<u>X.XXXX0.0000¢</u>	<u>X.XXXX0.0029¢</u>	<u>X.XXXX¢</u>	<u>X.XXXX0.0029¢</u>
GT	<u>X.XXXX0.0000¢</u>	<u>X.XXXX0.0007¢</u>	<u>X.XXXX¢</u>	<u>X.XXXX0.0007¢</u>
STL	<u>X.XXXX0.0000¢</u>	<u>X.XXXX0.0768¢</u>	<u>X.XXXX¢</u>	<u>X.XXXX0.0768¢</u>
TRF	<u>X.XXXX0.0000¢</u>	<u>X.XXXX0.0123¢</u>	<u>X.XXXX¢</u>	<u>X.XXXX0.0123¢</u>
POL	<u>X.XXXX0.0000¢</u>	<u>X.XXXX0.0978¢</u>	<u>X.XXXX¢</u>	<u>X.XXXX0.0978¢</u>

f. Provision Expired

RIDER EDR
Economic Development Rider

g. Provision Expired

h. Automaker Credit Provision

APPLICABILITY:

Applicable to domestic automaker facilities with more than 45 million kilowatt-hours of consumption for the 12 monthly billing periods ended December 31, 2009 at a single site. This Automaker Credit Provision is available for customers who take electric generation service from a certified supplier.

RATE:

All credits included in Section (h) of this Rider are applied only to usage that exceeds the average of the customer's twelve (12) billing periods ended December 31, 2009 ("Baseline Usage").

All kWhs over Baseline Usage, per kWh	(1.0000) ¢
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i. Automaker Charge Provision

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules with the exception of General Service - Transmission (GT), Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL). This Automaker Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:

The charges provided for by Section (i) of this Rider recover costs associated with implementation of the Automaker Credit Provision.

RATE:

The following charge will apply effective for service rendered beginning February 1, 2025[DATE], for all kWhs per kWh:

Automaker Charge	0.0022¢
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RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on a quarterly basis. No later than December 1st, March 1st, June 1st and September 1st of each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st, April 1st, July 1st and October 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission ~~in accordance with the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO.~~

RIDER EDR
Economic Development Rider

a. Residential Non-Standard Credit Provision

APPLICABILITY:

Applicable to residential customers taking service under the Company's rate schedule RS to which the Company's Residential Distribution Credit Rider (RDC) applies. This Residential Non-Standard Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

RATE:

The following Residential Non-Standard credits are effective for service rendered beginning September 1, 2009, for all kWhs per kWh in excess of 500 kWhs per month which are consumed by the customer during the winter billing periods as defined in the Electric Service Regulations:

Customer rate schedule as of December 31, 2008

Residential Rate "R-02" (Add-On Heat Pump)-Original Sheet No. 11	(1.9000)¢
Residential Rate "R-06" (Space Heating and Water Heating)-Original Sheet No. 13	(1.9000)¢
Residential Rate "R-06a" (Space Heating and Water Heating)-Original Sheet No. 14	(1.9000)¢
Residential Rate "R-04" (Water Heating)-Original Sheet No. 15	(0.5000)¢
Residential Rate "R-04a" (Water Heating)-Original Sheet No. 16	(0.5000)¢
Residential Rate "R-07" (Space Heating)-Original Sheet No. 17	(1.9000)¢
Residential Rate "R-07a" (Space Heating)-Original Sheet No. 18	(1.9000)¢
Residential Rate "R-09" (Apartment Rate)-Original Sheet No. 19	(1.9000)¢
Residential Rate "R-09a" (Apartment Rate)-Original Sheet No. 20	(1.9000)¢

b. Interruptible Credit Provision

APPLICABILITY:

Applicable to all customers taking service under the Company's Economic Load Response Program Rider (ELR).

RATE:

The following interruptible credits will apply, by rate schedule, effective for service rendered beginning ~~February 1, 2025~~[DATE] by unit of Curtailable Load, as defined in Rider ELR. If a customer chooses to participate with a CSP other than the Company, the program credit will be reduced by \$1.00 per kW-month.

GP (per kW)	\$ (45.000)
GSU (per kW)	\$ (45.000)
GT (per kW)	\$ (45.000)

RIDER EDR
Economic Development Rider

c. Non Residential Credit Provision

APPLICABILITY:

Applicable to any customer taking General Service - Transmission (GT), Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL) service under the Company's rate schedules. This Non-Residential Credit Provision is not applied during the period a customer takes electric generation service from a certified supplier.

RATE:

The following credits will apply, by rate schedule, effective for service rendered beginning ~~February 1, 2025~~^{February 1, 2025}~~[DATE]~~, for all kWhs, per kWh:

GT	(0.0000)¢
STL	(0.0000)¢
TRF	(0.0000)¢
POL	(0.0000)¢

d. General Service – Transmission (Rate GT) Provision

APPLICABILITY:

~~Applicable to any customer taking service under the Company's General Service – Transmission (Rate GT). This provision is not avoidable for customers who take electric generation service from a certified supplier.~~

RATE:

~~The following charge will apply, effective for service rendered beginning February 1, 2025:~~

~~— GT (per kVA of billing demand) ————— \$0.0000~~

~~The following credit will apply, effective for service rendered beginning February 1, 2025:~~

~~— GT (all kWhs, per kWh) ————— (0.0000)¢~~

ADDITIONAL PROVISION:

~~The charges provided for by Section (d) of this Rider shall be applied to the greater of (i) the measured monthly on-peak demand, or (ii) 25% of the measure monthly off peak demand. Monthly on-peak demand is defined as the highest thirty (30) minute integrated kVA between the hours of 6:00 a.m. to 10:00 p.m. EST (equivalent to 7:00 a.m. to 11:00 p.m. EDT), Monday through Friday, excluding holidays. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. Monthly off-peak demand is defined as the highest thirty (30) minute integrated kVA for all other hours. This provision of Rider EDR is reconciled within this subpart (d) quarterly and is revenue neutral to the Companies.~~

RIDER EDR
Economic Development Rider

e. Standard Charge Provision

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. This Standard Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:

The charges provided for by Section (e) of this Rider recover the difference in revenues resulting from the application of rates in the otherwise applicable rate schedule, and the application of credits in sections (a), (b), and (c) of this Rider.

RATE:

The following total charges will apply, by rate schedule for all kWhs per kWh:

	<u>Provision 1</u>	<u>Provision 2</u>	<u>Provision 3</u>	<u>Total</u>
RS	X.XXXX0.0000¢	X.XXXX0.0252¢	X.XXXX¢	0.0252X.XXXX¢
GS	X.XXXX0.1214¢	X.XXXX0.0197¢	X.XXXX¢	0.1408X.XXXX¢
GP	X.XXXX0.5272¢	X.XXXX0.0064¢	X.XXXX¢	0.5333X.XXXX¢
GSU	X.XXXX0.0000¢	X.XXXX0.0029¢	X.XXXX¢	0.0029X.XXXX¢
GT	X.XXXX0.0000¢	X.XXXX0.0007¢	X.XXXX¢	0.0007X.XXXX¢
STL	X.XXXX0.0000¢	X.XXXX0.0768¢	X.XXXX¢	0.0768X.XXXX¢
TRF	X.XXXX0.0000¢	X.XXXX0.0123¢	X.XXXX¢	0.0123X.XXXX¢
POL	X.XXXX0.0000¢	X.XXXX0.0978¢	X.XXXX¢	0.0978X.XXXX¢

f. Provision Expired

RIDER EDR
Economic Development Rider

g. Provision Expired

h. Automaker Credit Provision

APPLICABILITY:

Applicable to domestic automaker facilities with more than 45 million kilowatt-hours of consumption for the 12 monthly billing periods ended December 31, 2009 at a single site. This Automaker Credit Provision is available for customers who take electric generation service from a certified supplier.

RATE:

All credits included in Section (h) of this Rider are applied only to usage that exceeds the average of the customer's twelve (12) billing periods ended December 31, 2009 ("Baseline Usage").

All kWhs over Baseline Usage, per kWh	(1.0000)¢
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i. Automaker Charge Provision

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules with the exception of General Service - Transmission (GT), Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL). This Automaker Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:

The charges provided for by Section (i) of this Rider recover costs associated with implementation of the Automaker Credit Provision.

RATE:

The following charge will apply effective for service rendered beginning ~~February 1, 2025~~^[DATE], for all kWhs per kWh:

Automaker Charge	0.0022¢
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RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on a quarterly basis. No later than December 1st, March 1st, June 1st and September 1st of each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st, April 1st, July 1st and October 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission ~~in accordance with the July 18, 2012 Opinion and Order in Case No. 12-1230-EL-SSO, and the March 31, 2016 Opinion and Order in Case No. 14-1297-EL-SSO.~~

Energy Efficiency Cost Recovery Rider
Rate Design
Estimated Year 2

	OE	CEI	TE	Total	Notes
(1) Residential					
(2) Residential EE Cost	\$ 8,702,842	\$ 4,984,893	\$ 2,344,787	\$ 16,032,521	Source: Current Company forecast
(3) Prior Period Reconciliation				\$ -	Source: Company records
(4) Revenue Requirement	\$ 8,702,842	\$ 4,984,893	\$ 2,344,787	\$ 16,032,521	Line 2 + Line 3
(5)					
(6) Revenue Requirement w/ CAT	\$ 8,725,528	\$ 4,997,887	\$ 2,350,899	\$ 16,074,315	Line 4 / (1 - CAT)
(7)					
(8) Non-Residential					
(9) Non-Residential EE Cost	\$ -	\$ -	\$ -	\$ -	Source: Current Company forecast
(10) Prior Period Reconciliation				\$ -	Source: Company records
(11) Revenue Requirement	\$ -	\$ -	\$ -	\$ -	Line 9 + Line 10
(12)					
(13) Revenue Requirement w/ CAT	\$ -	\$ -	\$ -	\$ -	Line 11 / (1 - CAT)
(14)					
(15) Annual MWh Sales	OE	CEI	TE		
(16) Residential	9,713,587	5,682,148	2,662,352		Source: Current Company forecast
(17) Non-Residential	15,457,565	12,063,176	8,673,569		Source: Current Company forecast
(18)					
(19) Rate (\$/kWh)	OE	CEI	TE		
(20) Residential	\$ 0.000898	\$ 0.000880	\$ 0.000883		Line 6 / (Line 16 x 1000)
(21) Non-Residential	\$ -	\$ -	\$ -		Line 13 / (Line 17 x 1000)

**Energy Efficiency Cost Recovery Rider
Estimated Revenue Requirement and Rates - RS Only**

Spend	OE	CEI	TE	Total
Year 1	\$ 8,125,903	\$ 4,753,402	\$ 2,227,191	\$ 15,106,496
Year 2	\$ 8,125,903	\$ 4,753,402	\$ 2,227,191	\$ 15,106,496
Year 3	\$ 8,125,903	\$ 4,753,402	\$ 2,227,191	\$ 15,106,496
Total	\$ 24,377,708	\$ 14,260,206	\$ 6,681,574	\$ 45,319,488

Interest Rate	OE	CEI	TE
Year 1	7.1%	4.9%	5.3%
Year 2	7.1%	4.9%	5.3%
Year 3	7.1%	4.9%	5.3%

Revenue Req	OE	CEI	TE	Total
Year 1	\$ -	\$ -	\$ -	\$ -
Year 2	\$ 8,702,842	\$ 4,984,893	\$ 2,344,787	\$ 16,032,521
Year 3	\$ 8,702,842	\$ 4,984,893	\$ 2,344,787	\$ 16,032,521

Revenue Req w CAT	OE	CEI	TE	Total
Year 1	\$ -	\$ -	\$ -	\$ -
Year 2	\$ 8,725,528	\$ 4,997,887	\$ 2,350,899	\$ 16,074,315
Year 3	\$ 8,725,528	\$ 4,997,887	\$ 2,350,899	\$ 16,074,315

MWh	OE	CEI	TE	Total
Year 1	9,713,587	5,682,148	2,662,352	\$ 18,058,087
Year 2	9,713,587	5,682,148	2,662,352	\$ 18,058,087
Year 3	9,713,587	5,682,148	2,662,352	\$ 18,058,087

\$/kWh	OE	CEI	TE	Total
Year 1	\$ -	\$ -	\$ -	\$ -
Year 2	\$ 0.000898	\$ 0.000880	\$ 0.000883	\$ 0.000890
Year 3	\$ 0.000898	\$ 0.000880	\$ 0.000883	\$ 0.000890

RIDER EEC
Energy Efficiency Cost Recovery Rider

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. The Energy Efficiency Cost Recovery Rider ("EEC") charges will apply effective for service rendered beginning [DATE]. This Rider is not avoidable for customers who take electric generation service from a certified supplier.

RATE:

Rider EEC charges will be a single cents per kWh rate for all kWh per month per customer billing account.

RS	X.XXXX¢
GS	X.XXXX¢
GP	X.XXXX¢
GSU	X.XXXX¢
GT	X.XXXX¢
STL	X.XXXX¢
TRF	X.XXXX¢
POL	X.XXXX¢

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on an annual basis. On or about April 1st each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on June 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission.

RIDER EEC
Energy Efficiency Cost Recovery Rider

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. The Energy Efficiency Cost Recovery Rider ("EEC") charges will apply effective for service rendered beginning [DATE]. This Rider is not avoidable for customers who take electric generation service from a certified supplier.

RATE:

Rider EEC charges will be a single cents per kWh rate for all kWh per month per customer billing account.

RS	X.XXXX¢
GS	X.XXXX¢
GP	X.XXXX¢
GSU	X.XXXX¢
GT	X.XXXX¢
STL	X.XXXX¢
TRF	X.XXXX¢
POL	X.XXXX¢

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on an annual basis. On or about April 1st each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on June 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission.

RIDER EEC
Energy Efficiency Cost Recovery Rider

APPLICABILITY:

Applicable to any customer that takes electric service under the Company's rate schedules. The Energy Efficiency Cost Recovery Rider ("EEC") charges will apply effective for service rendered beginning [DATE]. This Rider is not avoidable for customers who take electric generation service from a certified supplier.

RATE:

Rider EEC charges will be a single cents per kWh rate for all kWh per month per customer billing account.

RS	X.XXXX¢
GS	X.XXXX¢
GP	X.XXXX¢
GSU	X.XXXX¢
GT	X.XXXX¢
STL	X.XXXX¢
TRF	X.XXXX¢
POL	X.XXXX¢

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on an annual basis. On or about April 1st each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on June 1st of each year. To the extent permitted by law, this Rider is subject to reconciliation, including, but not limited to increases or refunds. Such reconciliation shall be based solely upon the results of audits ordered by the Commission.