

1 that in more detail.

2 Q. (Quinlan) Okay. That's all my
3 questions.

4 A. (Davis) Could I offer something
5 else as a follow-up from last Thursday.

6 Q. (Quinlan) Sure.

7 A. (Davis) Mr. Quinlan, you had asked
8 the company -- we were looking at Exhibit
9 EAD-16, I believe, the bill frequencies.

10 Q. (Quinlan) Yes.

11 A. (Davis) And the company went back
12 and took a look at its residential Rates 1, 5
13 and 7, to just get a better sense of within
14 those rate classes what's the average usage
15 of customers who are quoted as hardship in
16 our billing system. So I think it's
17 important to note that the average monthly
18 kilowatt hours for those customers is very
19 close to the average for the class.

20 Rate 1, we identified about 83,000
21 customers that are coded as hardship, and
22 they had an average monthly kilowatt hour of
23 679 kilowatt hours which, you know, we use a
24 typical bill average near 700 kilowatt hours,
25 so that Rate 1 class is very near the

1 average.

2 Rate 5, the average monthly
3 kilowatt hour usage is about a little under
4 1100 kilowatt hours per month.

5 Q. (Quinlan) Right.

6 A. (Davis) That's for about 22,000
7 customers.

8 And Rate 7, it's a small class, 27,
9 so about 5 percent of that rate class, 27
10 customers had an average usage of about 930
11 kilowatt hours per month.

12 Q. (Quinlan) Right.

13 A. (Davis) So I think it was
14 important to note that those are all hardship
15 customers who have, on average, a relatively
16 high cents per -- monthly kilowatt hour
17 usage.

18 Q. (Quinlan) I don't think I asked
19 you any questions about that.

20 A. (Davis) No, I'm offering that
21 because --

22 Q. (Quinlan) I asked you questions
23 about the bill frequency.

24 A. (Davis) Yes.

25 Q. (Quinlan) And percentage of total

1 customers that were within certain levels.

2 A. (Davis) Oh, my recollection is we
3 were drilling our way through the bill
4 frequency for Rate 1, and we were working at
5 100 kilowatt hour, 200 kilowatt hour, 300
6 kilowatt hour.

7 Q. (Quinlan) Right, right.

8 A. (Davis) And there was discussion
9 of -- of --

10 Q. (Quinlan) Just the percentage of
11 customers.

12 A. (Davis) Understood. Understood.
13 And these numbers could give us percentages
14 as well.

15 Q. (Quinlan) All right. Thank you.

16 COMM. CARON: Mr. Wright?

17 MR. WRIGHT: Thank you. I
18 just have a few follow-up questions to some
19 of the territory Mr. Quinlan has just
20 addressed.

21 EXAMINATION

22 BY MR. WRIGHT:

23 Q. (Wright) Mr. Goodwin, I just
24 wanted to follow up on a couple of the issues
25 you touched upon with the revenue decoupling