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**VIA E-Filing Only**

October 21, 2022

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, Pennsylvania 17120

**SUBJECT:** PECO Energy Company's 2021-2022 Default Service Program Time-of-Use  
Annual Report, Docket Number P-2020-3019290

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PECO Energy Company ("PECO") is a copy of PECO's Default Service Program Time-Of-Use Annual Report for the period from August 20, 2021 through May 31, 2022.

Due to the continuing COVID-19 pandemic, PECO's employees are working in the office on a part-time basis. Accordingly, PECO employees will have limited access to photocopying and U.S. mail, among other services. PECO requests that all communications with PECO employees continue to be transmitted by email.

Thank you for your assistance in this matter and if you have any questions please contact Megan McDevitt, Senior Manager, Retail Rates at 215-841-6361 or via email at [megan.mcdevitt@exeloncorp.com](mailto:megan.mcdevitt@exeloncorp.com).

Sincerely,

A handwritten signature in black ink, appearing to read "R.G.W." followed by a long horizontal flourish.

Enclosures

cc: Per the Certificate of Service (w/encls.)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY** :  
**COMPANY FOR APPROVAL OF ITS** : **Docket No. P-2020-3019290**  
**DEFAULT SERVICE PLAN FOR THE** :  
**PERIOD FROM JUNE 1, 2021** :  
**THROUGH MAY 31, 2025** :

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of **PECO Energy Company's 2021-2022 Default Service Program Time-Of-Use Annual Report** on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

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Dated: October 21, 2022

*Assistant General Counsel for PECO Energy  
Company*

## Default Service Program Time-of-Use (“DSP-TOU”) Annual Report, August 2021 – May 2022

In September 2021, PECO Energy Company (“PECO” or “Company”) launched voluntary electric Default Service Program Time-Of-Use (“DSP-TOU”) generation pricing for eligible default service customers with smart meters. The Pennsylvania Public Utility Commission (the “Commission”) approved these rates in December of 2020 as part of PECO’s fifth Default Service Program (“DSP V”, Docket Number P-2020-3019290).

This Annual Report, required pursuant to 66 Pa. C.S. § 2807(f) (5), assesses the impact of PECO’s DSP-TOU rates on energy prices and consumption for the period of August 20, 2021 through May 31, 2022. A typical program year will begin on June 1<sup>st</sup> and end on May 31<sup>st</sup>, coinciding with the PJM delivery year as well as with a one-year period within PECO’s DSP. For this initial Annual Report, the start date of the program year is based on PECO’s August 2021 implementation of its DSP-TOU rates.

### **Overview**

PECO introduced its DSP-TOU rates to comply with its related obligations under Pennsylvania Act 129 of 2008 (“Act 129”). Objectives of these rates include incentivizing customers to modify their behaviors by shifting their electricity usage to lower-cost, off-peak hours, including charging of Electric Vehicles (“EVs”) into the overnight energy hours when prices are lowest.

PECO procures default service supply for three different customer classes (“Procurement Classes”):

- (1) Residential Class or “GSA 1” (Rate Schedules R and RH)
- (2) Small Commercial Class or “GSA 2”, which includes customers with annual peak demand less than or equal to 100 kW of annual peak demand (Rate Schedules GS, PD, and HT) and lighting customers (Rate Schedules AL, POL, SLE, SLS, SLC, and TLCL)
- (3) Consolidated Large C&I Class or “GSA 3/4”, which includes customers with annual peak demand greater than 100 kW (Rate Schedules GS, PD, HT and EP)

PECO’s DSP-TOU rates are available to customers with smart meters who choose PECO for their default supply and are not receiving hourly-priced default service (i.e., the Residential Class or “GSA 1”, and the Small Commercial Classes or “GSA 2”). This includes customer-generators who employ net metering. Residential customers enrolled in PECO’s Customer Assistance Program (“CAP”), as well as customer-generators who employ virtual net metering, are not eligible to participate in these rates.

Customers are not charged any enrollment or termination fees and will remain on the DSP-TOU rate until they affirmatively elect to return to PECO’s standard default service rate, switch to a competitive retail Electric Generation Supplier, or otherwise become ineligible. Customers

leaving the DSP-TOU rates are precluded from re-enrolling for twelve (12) billing months afterwards.

PECO differentiates DSP-TOU pricing across three periods (Peak, Off-Peak, and Super Off-Peak) that remain constant year-round based on price multipliers designed to motivate load shifting outside of Peak hours. Participating customers pay discounted rates for Off-Peak and Super Off-Peak usage, as well as a higher rate for Peak usage, relative to PECO’s applicable standard non-time-varying default service rates. (Participation does not guarantee savings.)

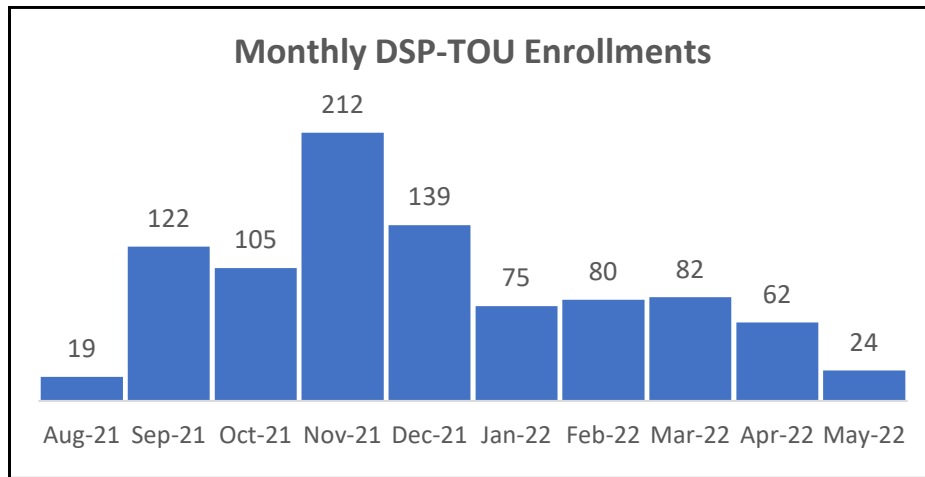
TOU Pricing Period	Year-Round Days/Hours Included
Peak	2 p.m. – 6 p.m. Monday through Friday, excluding PJM holidays
Super Off-Peak	12 a.m. – 6 a.m. Every day
Off-Peak	All other hours

PECO adjusts the DSP-TOU rates on a quarterly basis. These adjustments are synchronized with adjustments to PECO’s standard non-time-varying default service rates and included as part of PECO’s quarterly Generation Supply Adjustment (“GSA”) filings with the Commission. PECO sources both the standard and TOU default service for Residential and Small Commercial customers from the same supply portfolio for each Procurement Class and uses the quarterly standard non-time-varying default service GSA prices as the reference prices for its DSP-TOU rate calculations.

Pursuant to the terms of the approved PECO DSP V Settlement, PECO reviews and updates the DSP-TOU multipliers annually, using a rolling five years of historical PJM energy and capacity pricing data for the PECO zone. PECO’s initial updates to the original Commission-approved multipliers became effective with DSP-TOU pricing as of June 1, 2022.

**Customer Participation**

PECO began accepting customer enrollments for the DSP-TOU rates on August 20, 2021. As of May 31, 2022, the end of PECO’s DSP year, 920 PECO customers actively enrolled on the DSP-TOU rate, 906 of which were residential.

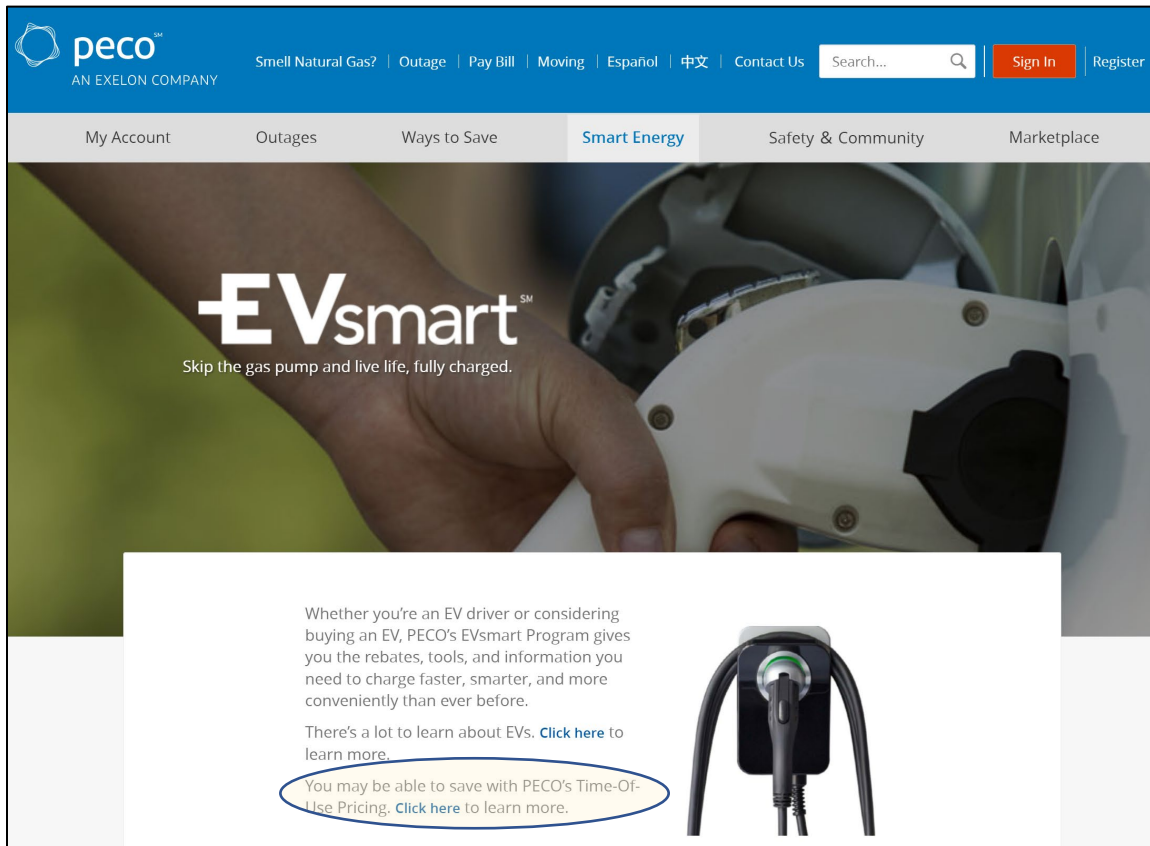


### **Company Outreach Summary**

PECO’s initial communications and marketing plan at the time of the 2021 launch partially focused on proactively educating and informing two specific customer groups about the DSP-TOU rates, customers owning EVs and net-metered solar customers.

Customers owning EVs are among those best-positioned to take advantage of the lower pricing offered during the overnight Super Off-Peak hours by charging their EVs during those periods. In October 2021, PECO sent a targeted e-mail promoting the EV-related potential benefits of DSP-TOU to 2,820 customers who had previously applied for an EV-related rebate through PECO’s website. 37 of these customers enrolled on the DSP-TOU rate following receipt of that communication. As of May 31, 2022, PECO has confirmed that 123 customers who had previously applied for an EV-related rebate through PECO’s website have enrolled on DSP-TOU.

To further educate and inform EV owners about DSP-TOU, PECO also added verbiage to its Electric Vehicles web page, located at [www.peco.com/EV](http://www.peco.com/EV) and highlighted below.



PECO distributed a similar targeted e-mail communication to a subset of customers formerly enrolled in PECO's "Smart A/C Saver" program. This program, which ended on May 31, 2021, was a demand response initiative in which participants received a bill credit in exchange for allowing PECO to remotely cycle or shut down their central air conditioning unit on short notice during events in the summer months. PECO chose to proactively communicate DSP-TOU to these customers based on their prior willingness to shift load off-peak in exchange for bill savings. The Company had valid e-mail addresses on file for 24,334 former Smart A/C Saver program customers and distributed this targeted e-mail to those customers in November of 2021. As of May 31, 2022, PECO has confirmed that 205 customers who were formerly enrolled in the Smart A/C Saver program have enrolled in DSP-TOU.

Net metered customers may also benefit from energy generated during weekday peak periods. In July 2021, PECO presented a webinar fully dedicated to training solar developers on the DSP-TOU rates and their implications for net metering customers. The intent was to provide solar developers with enough information to inform and potentially advise their respective customers about PECO's DSP-TOU rates. As of May 31, 2022, 173 of the 920 customers who have enrolled in DSP-TOU also participate in net metering.

In addition, PECO distributed a one-time DSP-TOU bill insert to all electric customers in late 2021 informing customers that the new rates were available and directing customers to its website at [www.peco.com/TOU](http://www.peco.com/TOU) for more information.



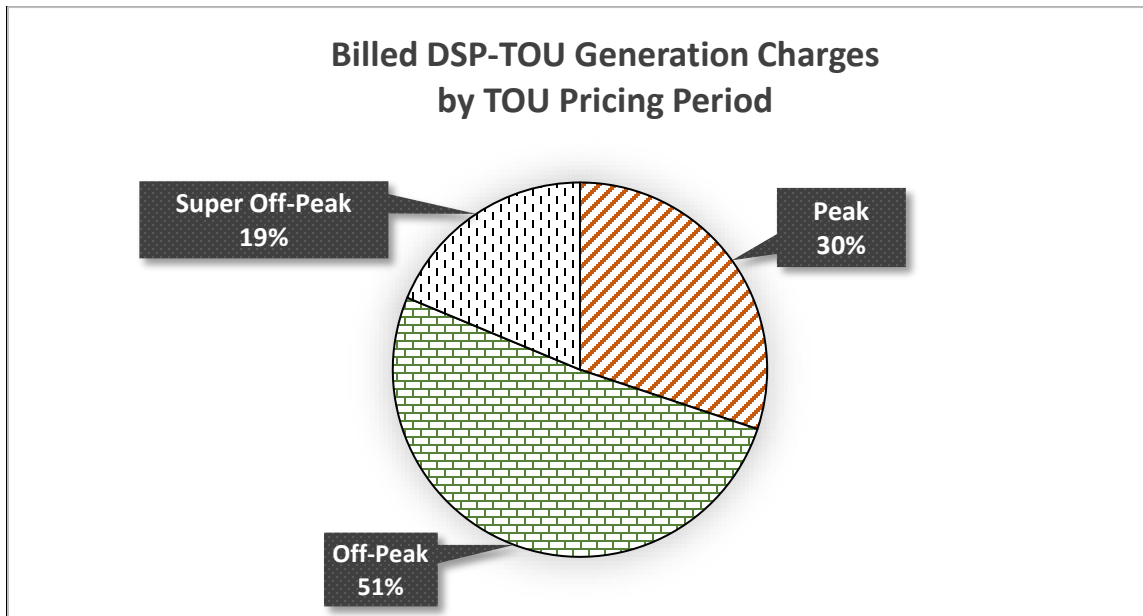
Pursuant to the terms of the approved PECO DSP V Settlement, all of PECO’s TOU outreach and education materials continue to include the following statements, with the title “Important Information About Time-Of-Use Rates”:

- a) “Time of Use rates may not be appropriate for customers that cannot change the time of day that they rely on electricity, such as those with medical devices that require electricity or customers who are home during peak hours.”
- b) “If you are a low-income customer, other programs and rate assistance may be available to help you to afford your bill. Contact PECO at 1-800-774-7040 for more information and to apply.”

**Participant Savings**

PECO assesses customer savings while participating in DSP-TOU by comparing their billed TOU generation charges with the charges that would have been billed if those customers had remained on PECO’s standard non-time-varying generation rates.

As shown by the following chart, 70% of billed DSP-TOU charges correspond to usage consumed outside of peak hours.



The average monthly savings per customer for the 920 customers enrolled on DSP-TOU as of May 31, 2022 is \$8.46 per month over PECO’s standard non-time-varying default service generation rate.

## Impact on Confirmed Low-Income Customers

PECO's DSP V Settlement requires the Company to evaluate the impacts of the DSP-TOU rates on confirmed low-income customers as part of this Annual Report. PECO defines a confirmed low-income customer as having met one of the following criteria:

- Customer currently participates in PECO's CAP.
- PECO has verified financial information submitted by the customer which demonstrates income level at or below 150% of the federal poverty income guidelines.
- Customer has received a Low Income Home Energy Assistance Program ("LIHEAP") grant within the past two years.
- Customer has received a Matching Energy Assistance Fund ("MEAF") grant within the past two years.

PECO has identified **five** confirmed low-income customers who enrolled on and billed at least once on DSP-TOU rates. Please see the chart below for related financial impacts of DSP-TOU on these customers.

Customer	Billing Year-Month	Distribution Rate Class	Peak Charges - \$	Off Peak Charges - \$	Super Off Peak Charges - \$	Total DSP-TOU Charges - \$	Simulated Non-TOU Charges - \$	DSP-TOU Variance	
								Per Month	Average
1	Jan-2022	RH	\$10.38	\$19.80	\$5.30	\$35.48	\$40.19	\$4.71	\$2.49
	Feb-2022	RH	\$7.48	\$12.51	\$4.28	\$24.27	\$27.54	\$3.27	
	Mar-2022	RH	\$7.53	\$10.76	\$2.99	\$21.28	\$22.64	\$1.36	
	Apr-2022	RH	\$5.65	\$9.51	\$1.67	\$16.83	\$17.76	\$0.93	
	May-2022	RH	\$3.35	\$8.69	\$1.61	\$13.65	\$15.83	\$2.18	
2	Feb-2022	RH	\$44.65	\$73.86	\$21.76	\$140.27	\$155.72	\$15.45	\$10.97
	Mar-2022	RH	\$27.60	\$47.20	\$13.35	\$88.15	\$98.10	\$9.95	
	Apr-2022	RH	\$22.17	\$43.19	\$11.26	\$76.62	\$86.91	\$10.29	
	May-2022	RH	\$11.50	\$28.28	\$6.76	\$46.54	\$54.74	\$8.20	
3	Jan-2022	R	\$25.13	\$104.77	\$35.66	\$165.56	\$218.73	\$53.17	\$124.03
	Feb-2022	R	\$57.32	\$354.78	\$116.36	\$528.46	\$723.34	\$194.88	
4	Dec-2021	R	\$14.95	\$17.97	\$2.87	\$35.79	\$34.30	(\$1.49)	(\$0.53)
	Jan-2022	R	\$15.16	\$21.19	\$3.80	\$40.15	\$40.51	\$0.36	
	Feb-2022	R	\$13.91	\$17.40	\$3.07	\$34.38	\$33.61	(\$0.77)	
	Mar-2022	R	\$11.92	\$15.44	\$2.83	\$30.19	\$29.91	(\$0.28)	
	Apr-2022	R	\$13.17	\$15.35	\$2.57	\$31.09	\$29.66	(\$1.43)	
5	May-2022	R	\$0.00	\$3.96	\$8.08	\$12.04	\$3.86	(8.18)	(8.18)

PECO's DSP V Settlement also requires PECO to track DSP-TOU residential customers' income and demographic information (e.g., age, race, ethnicity and disability status), adding that eligible customers who refuse to disclose this information will not be precluded from enrolling in PECO's DSP-TOU rates. To attempt to capture this information, PECO invites residential customers enrolling in DSP-TOU to complete an optional survey during enrollment. Customers may answer some or all of the questions, or they have the option to skip the survey entirely.

Of the 920 customers who enrolled on DSP-TOU through May 31, 2022, 616 answered at least one question in the optional survey. The responses yielded the following data points:

- **Number of Household Members** – 526 of 602 responses indicated that more than one individual resides in the household.
- **Ethnic / Racial Background**
  - 448 of 563 responses (~80%) reported Caucasian/white members in the household. (46 of these responses reported mixed race households.)
  - 95 of the remaining responses, and 120 of the 563 responses overall (21.3%) reported Asian members in the household.
- **Age** – 211 of 616 responses (~34%) reported that at least one member of the household is over 60 years of age.
- **Household Income Level**
  - 315 of 438 responses (~72%) reported income of over \$90,000 per year.
  - 50 responses (~11.5%) reported income under \$45,000 per year.
- **Disability Status** – 26 of 541 responses (~5%) indicated that at least one member of the customer's household is eligible for accommodations under the Americans With Disabilities Act.

PECO does not independently verify that the responses disclosed by customers are correct.

### **Impact on Wholesale Energy Market Prices**

Wholesale market prices for energy vary by hour. PJM calculates hourly Locational Marginal Prices ("LMPs") for each zone, including PECO's, as a function of overall demand (which is highly dependent upon weather), generation availability, and fuel prices.

In theory, and given PJM's economic dispatch model for generation, lower demand during peak hours would result in lower LMPs for those hours, as PJM would not need to dispatch higher-priced generation to meet additional demand during those hours. However, quantifying the net impact of DSP-TOU participation on an hourly basis is difficult for several reasons:

- DSP-TOU participation, in terms of both customer volume and related load, remains low.
- PECO does not have the information necessary to estimate the degree to which TOU customers are likely to conserve load vs. shift load.

- Any load shift from Peak hours to Off-Peak hours could contribute to higher LMPs in those Off-Peak hours. The net impact of a TOU rate on energy prices must therefore consider the net of both the lower costs during Peak hours and any resulting higher costs during the Off-Peak hours. PECO does not have the information necessary to estimate what the PJM LMPs would have been absent customer load shifting and conservation.

### **Impact of TOU Savings on Non-TOU Default Service Customers**

In light of the above discussion on TOU customer savings, PECO recognizes that the amount of revenue received from customers participating in DSP-TOU rates is likely to be lower than the amount of revenue that would be received under its otherwise applicable standard non-time-varying generation rates. This potentially creates a shortfall in revenue that would need to be recovered from all other default service customers who have not elected DSP-TOU rates.

Given that DSP-TOU participation, in terms of both customer volume and related load, remains low at this time, PECO submits that the existing revenue shortfall as of May 31, 2022 will not materially impact other default service customers as illustrated by the data shown in the two tables that follow below. (This analysis does not consider the impact that offering DSP-TOU rates has on standard GSA rates.)

**PECO Default Service Program Time of Use (DSP-TOU) Rates  
GSA 1, Rates R and RH**

	GSA 1 Standard Rate (cents / kwh) (1)	DSP-TOU Rates R and RH Sales (kwh) (2)	Theoretical GSA 1 Standard Residential Revenues (3) = ((1) x (2))/100, in \$	Total DSP-TOU GSA 1 Residential Revenues (6) = (4) + (5)	DSP-TOU Excess / (Shortfall) (7) = (6) - (3)	Total GSA 1 Revenues (8)	DSP-TOU Excess/(Shortfall) as Percent of Total GSA 1 Revenues (9) = (7) / (8)	DSP-TOU GSA 1 Revenues as Percent of Total GSA 1 Revenues (10) = (6) / (8)
Sep-21	6.012	-	\$ -	\$ -	\$ -	\$ 63,868,552	0.0000%	0.0000%
Oct-21	6.012	44,938	\$ 2,702	\$ 2,184	\$ (518)	\$ 43,860,222	(0.0012%)	0.0050%
Nov-21	6.012	140,529	\$ 8,449	\$ 6,915	\$ (1,534)	\$ 38,819,352	(0.0040%)	0.0178%
Dec-21	6.388	395,566	\$ 25,269	\$ 20,458	\$ (4,811)	\$ 56,246,547	(0.0086%)	0.0364%
Jan-22	6.390	771,516	\$ 49,300	\$ 42,025	\$ (7,275)	\$ 68,097,150	(0.0107%)	0.0617%
Feb-22	6.390	852,475	\$ 54,473	\$ 45,588	\$ (8,885)	\$ 66,474,843	(0.0134%)	0.0686%
Mar-22	6.433	812,550	\$ 52,271	\$ 41,508	\$ (10,763)	\$ 52,624,184	(0.0205%)	0.0789%
Apr-22	6.433	797,546	\$ 51,306	\$ 39,926	\$ (11,380)	\$ 45,407,411	(0.0251%)	0.0879%
May-22	6.433	744,724	\$ 47,908	\$ 23,776	\$ (24,132)	\$ 41,053,078	(0.0588%)	0.0579%
Jun-22	6.909	963,288	\$ 66,554	\$ 55,564	\$ (10,990)	\$ 58,031,636	(0.0189%)	0.0957%

**PECO Default Service Program Time of Use (DSP-TOU) Rates  
GSA 2, Rate GS - See Note (1) below**

	GSA 2 Standard GS Rate (cents / kwh) (1)	DSP-TOU Rate GS Sales (kwh) (2)	Theoretical Standard GSA 2 Rate GS Revenues (3) = ((1) x (2))/100 in \$	DSP-TOU GSA 2 Rate GS Revenues (4)	DSP-TOU Excess/ (Shortfall) (5) = (4) - (3)	Total GSA 2 Revenues (6)	DSP-TOU Excess/(Shortfall) as Percent of Total GSA 2 Revenues (7) = (5) / (6)	DSP-TOU GSA 2 Revenues as Percent of Total GSA 2 Revenues (8) = (4) / (6)
Sep-21	5.306	-	\$ -	\$ -	\$ -	\$ 9,581,954	0.0000%	0.0000%
Oct-21	5.306	-	\$ -	\$ -	\$ -	\$ 7,927,957	0.0000%	0.0000%
Nov-21	5.306	779	\$ 41	\$ 29	\$ (12)	\$ 7,357,795	(0.0002%)	0.0004%
Dec-21	5.747	11,484	\$ 660	\$ 632	\$ (28)	\$ 9,663,600	(0.0003%)	0.0065%
Jan-22	5.749	10,248	\$ 589	\$ 577	\$ (12)	\$ 11,144,962	(0.0001%)	0.0052%
Feb-22	5.749	13,001	\$ 747	\$ 719	\$ (28)	\$ 11,455,648	(0.0002%)	0.0063%
Mar-22	6.346	10,631	\$ 675	\$ 635	\$ (40)	\$ 10,767,734	(0.0004%)	0.0059%
Apr-22	6.346	10,500	\$ 666	\$ 632	\$ (35)	\$ 9,841,870	(0.0004%)	0.0064%
May-22	6.346	8,156	\$ 518	\$ 496	\$ (22)	\$ 9,455,280	(0.0002%)	0.0052%
Jun-22	7.026	24,876	\$ 1,748	\$ 1,873	\$ 126	\$ 12,379,360	0.0010%	0.0151%

*Note (1): GSA 2 customers under Rates GS, PD and HT are eligible to enroll in DSP-TOU. As of May 31, 2022, only customers under Rate GS have enrolled.*