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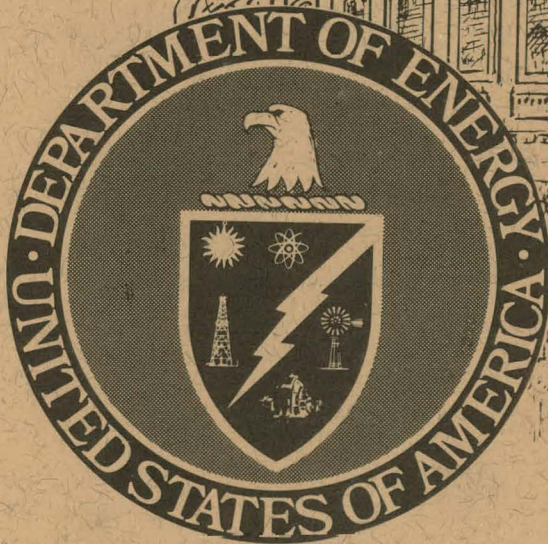
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**Public Utility  
Regulatory Policies  
Act of 1978**

**Annual Report  
to Congress**

**May 1980**

**MASTER**



Economic Regulatory Administration  
U.S. Department of Energy

**Volume 2**

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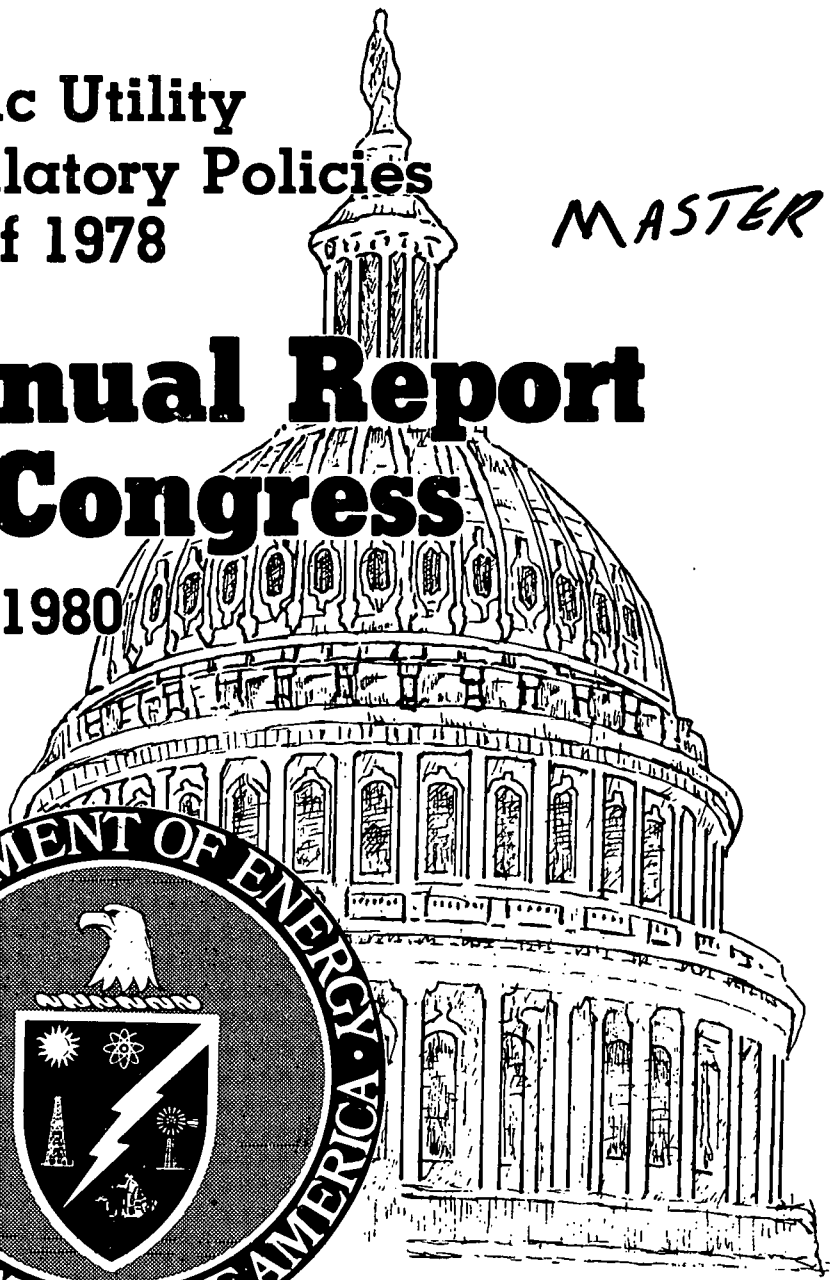
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## INTRODUCTION

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Titles I and III of the Public Utility Regulatory Policies Act of 1978 (PURPA) establish retail regulatory policies for electric and natural gas utilities, respectively, aimed at achieving three purposes:

- Conservation of energy supplied by electric and gas utilities
- Efficiency in the use of facilities and resources by these utilities
- Equitable rates to electricity and natural gas consumers

PURPA also continues the pilot utility implementation program, authorized under Title II of the Energy Conservation and Production Act (ECPA), to encourage adoption of cost-based rates and efficient energy management practices.

This report was prepared in compliance with the reporting requirements established under Sections 116 and 309 of PURPA and Section 206 of ECPA. More specifically, the purpose of this report is twofold: (1) to summarize and analyze the progress that state regulatory authorities and certain nonregulated utilities have made in their consideration of the PURPA standards; and (2) to summarize the Department of Energy (DOE) activities relating to PURPA and ECPA. The report provides a broad overview and assessment of the status of electric and gas regulation nationwide, and thus helps provide the basis for congressional and DOE actions targeted on the utility industry to address pressing national energy problems.

### 1.1 BACKGROUND AND OVERVIEW

To promote the achievement of the three purposes of PURPA, Titles I and III establish federal standards concerning ratemaking and regulatory initiatives that must be undertaken by state agencies responsible for regulating the retail operations of electric and gas utilities, and by certain nonregulated utilities. Specifically,

Title I sets forth six ratemaking and five regulatory standards. The ratemaking standards cover cost-of-service, declining-block rates, seasonal rates, time-of-day rates, interruptible rates, and load management techniques. The five regulatory standards deal with master metering, automatic adjustment clauses, information to consumers, termination of service, and advertising. Title III establishes two regulatory standards dealing with termination of service and advertising for gas utilities.

State regulatory authorities and covered nonregulated utilities are required to hold hearings and determine, by November 1981, whether or not to implement each of the six ratemaking standards; the state regulatory authorities and nonregulated utilities must also complete proceedings and determine, by November 1980, whether or not to adopt the regulatory standards.\* These determinations must be made for each electric and gas utility covered under PURPA: 321 electric utilities (256 regulated and 65 nonregulated) with annual retail sales exceeding 500 million kilowatt hours; and 217 gas utilities (202 regulated and 15 nonregulated) with annual retail sales exceeding 10 billion cubic feet.\*\* Over 90 percent of the electricity and gas consumers nationwide are served by these utilities.

As a means of overseeing nationwide progress in considering the PURPA ratemaking and regulatory standards, Congress required DOE to establish reporting requirements. State regulatory authorities and nonregulated utilities are required to complete and submit progress reports to DOE annually beginning in November 1979. Congress also required DOE to review these reports and to submit a report to Congress on overall progress by May 1980, and then annually for each of the next 10 years. This report is the first of these required reports to Congress.

To comply with this congressional mandate, DOE developed Form ERA-166 (see Appendix A). This reporting format was offered for public review and comment, revised, and then distributed to the state regulatory authorities with jurisdiction over the regulated electric and gas utilities covered by PURPA as well as to the nonregulated electric and gas utilities covered by PURPA.

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\* Determine means either to implement the ratemaking standards or adopt the regulatory standards as those terms are used in Sections 111 and 113 respectively.

\*\* For the purposes of this report only, each regulatory jurisdiction in which a multistate utility operates is considered a separate covered utility.

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## 1.2 FORMS ANALYSIS AND APPROACH

DOE collected information from the state regulatory authorities and covered nonregulated utilities, validated it, and then performed several analyses.

### 1.2.1 Data Collection

Sixty-nine of the nonregulated electric and 12 of the nonregulated gas utilities submitted their status reports to DOE by the November 9, 1979, deadline. Three nonregulated electric utilities (in California, Louisiana, and North Carolina) and 2 nonregulated gas utilities (in Nebraska) did not submit reports. DOE also received 55 status reports from all but one (Mississippi) of the state regulatory authorities required to submit reports.\* Thus, DOE received status reports on consideration of the ratemaking and regulatory standards for 98 percent of all electric and 97 percent of all gas utilities subject to the requirements of PURPA.

### 1.2.2 Data Validation

After receiving these reports, DOE initiated a comprehensive review and analysis of the data and information indicating the progress that state regulatory authorities and nonregulated utilities have made in their consideration of the standards. First, DOE manually inspected every report submitted by the state regulatory authorities and nonregulated utilities. When the reports were inconsistent or incomplete, the appropriate state regulatory authority or nonregulated utility was called, and any changes submitted were confirmed in a follow-up letter. Spot checks of the reports were then performed against other in-house sources to verify the consistency of reported status. Through this approach, DOE was able to establish a reliable data base for subsequent analysis.

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\* Of the 7 regulated utilities for which DOE did not receive status reports, 2 electric and 2 gas utilities are regulated by the Mississippi Public Service Commission (PSC). The remaining 3 utilities for which data were not submitted are electric utilities regulated by the Louisiana Public Service Commission (PSC) and the Arizona Public Utility Commission (PUC) and a gas utility regulated by the Texas Railroad Commission.

### 1.2.3 Data Analysis

DOE's analysis of information received focused primarily on determining the status of the consideration process for each standard for each covered utility. To perform this as well as other analyses, we first extracted data manually from the reports. For the status analysis, we then calculated the percentage of covered utilities for which different levels of progress had been achieved. Recognizing that it is primarily through execution of the PURPA standards by the utilities that the purposes of PURPA can be achieved, we focused on identifying the percentage of utilities that had put each standard into effect and the corresponding percentage of customers affected. We then reviewed the characteristics of the standards for which decisions to implement or adopt had been made, to assess their degree of conformance with the purposes of PURPA.

We also evaluated the extent to which the state regulatory authorities and nonregulated utilities had met the procedural requirements established by PURPA for consideration of each standard. Most importantly, we identified whether the cost/benefit determinations required for the master metering, time-of-day rates, and load management techniques standards had been performed, and attempted to ascertain whether certain basic issues had been addressed in these studies.

In addition, we requested and evaluated information on the state regulatory authorities' and covered utilities' plans for monitoring the effects of putting the standards into effect. Monitoring is necessary to determine whether a standard is in fact contributing to the purposes of PURPA; effective monitoring requires the establishment of a baseline data base against which changes can be measured.

## 1.3 REPORT ORGANIZATION

This volume of the first annual report is organized into four remaining chapters and two appendixes:

- Chapter 2 reports progress on the six ratemaking standards. Specifically, we describe the standards; provide an overview of nationwide progress in considering, making determinations on, and putting into effect these standards; discuss the interrelationships among them; and provide a detailed assessment of the state regulatory authorities' and covered nonregulated utilities' progress.
- Chapter 3 reports progress on the five regulatory standards. Again, we describe the standards; discuss how they differ from the ratemaking standards in terms of their interrelationships (and

implications for the consideration process); provide an overview of nationwide progress in considering, making determinations on, and putting into effect these standards; and conclude with a detailed discussion of the status of the consideration process for each standard.

- Chapter 4 presents the status of the PURPA consideration process being conducted by state regulatory authorities and nonregulated utilities on a state-by-state basis. It includes an overview of those states in which a determination to implement or adopt at least one standard had been made.
- Chapter 5 provides a description of the organization and program missions of DOE's Office of Utility Systems and then describes the assistance that this office is providing the state regulatory authorities and nonregulated utilities in meeting their responsibilities under Titles I and III of PURPA and Title II of ECPA.
- Appendix A describes the development of the reporting form (Form ERA-166) for PURPA standards. A copy of the form is included.
- Appendix B contains a listing of workshops, conferences, and publications sponsored by the National Regulatory Research Institute.

## 2 PROGRESS ON PURPA RATEMAKING STANDARDS

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PURPA requires state regulatory authorities and covered nonregulated utilities to consider six ratemaking standards and to make a determination whether or not it is appropriate to implement each to carry out the purposes of PURPA. The six ratemaking standards relate to: (1) cost-of-service; (2) declining-block rates; (3) time-of-day rates; (4) seasonal rates; (5) interruptible rates; and (6) load management techniques. In the following sections, we:

- 2.1 Describe the six ratemaking standards
- 2.2 Provide an overview of nationwide progress in considering and implementing the standards
- 2.3 Discuss critical interrelationships among the standards
- 2.4 Provide a detailed assessment of the consideration process for each standard (including status, characteristics of the standards implemented, compliance with PURPA procedural requirements, number of customers covered, and monitoring methods) as reported to DOE by the state regulatory authorities and nonregulated utilities in Form ERA-166 and supplementary material
- 2.5 Present conclusions and concerns regarding progress on consideration of the PURPA ratemaking standards.

### 2.1 DESCRIPTION OF STANDARDS

PURPA sets forth six ratemaking standards that state regulatory authorities and covered nonregulated utilities are required to consider and make determinations whether or not to implement. These standards are described briefly in the following sections.

#### 2.1.1 Description: Cost-of-Service Standard

The cost-of-service standard set forth in Section 111(d) of PURPA requires that electric rates for each class of consumers be designed to reflect, to the maximum extent practicable, the costs of providing electric service to that class. Section 115(a) of PURPA requires

that consideration of the cost of service standard include (through methods prescribed by the state regulatory authority or nonregulated utility) identification of any differences in cost incurrence attributable to (1) daily and seasonal time of use, and (2) customer, demand, and energy cost components for each customer class. PURPA further requires that such methods take into account the effects on the utility's costs of (1) adding capacity to meet peak demands relative to base demand; and (2) generating additional kilowatt-hours (kWh). Embedded costing methods, by definition, do not meet this latter requirement.

The cost-of-service standard is the most fundamental of the six rate-making standards. By establishing the basic precept that electric rates should accurately reflect the underlying costs of providing electric service, this standard directly promotes the purposes of PURPA. Specifically, by providing correct price signals to consumers, and thereby fostering efficient production and consumption of electricity, cost-based rates will contribute to the achievement of both the conservation and the efficiency purposes set forth in PURPA. In addition, cost-based rates are generally considered to be equitable because each customer class bears the share of costs actually incurred by the utility to serve that class.

#### 2.1.2 Description: Declining-Block Rates Standard

The declining-block rates standard set forth in PURPA prohibits the use of declining-block rates unless the utility can show, for the energy component of its rate, that its energy-related costs actually decrease as a customer's consumption increases. A declining-block rate is one under which the price per kWh declines as a consumer's consumption increases during a specified billing period. Declining-block rates may promote electricity consumption, especially if they are not cost-based (i.e., if the lower kWh prices in the high consumption blocks understate the utility's actual costs).

#### 2.1.3 Description: Time-of-Day Rates Standard

The time-of-day rates standard set forth in PURPA requires state regulatory authorities and nonregulated utilities to identify the costs and benefits of time-of-day rates for each class of customers served as a basis for determining the cost-effectiveness of such rates. Time-of-day rates are considered to be cost-effective [as defined in Section 115(b)] if the benefits to the utility and the customer group to which the rates are applicable exceed the additional cost of metering and other (unspecified) costs associated with the use of such rates.

## 2.2 OVERVIEW OF NATIONWIDE PROGRESS

Overall, progress by both regulated and nonregulated utilities in the consideration process for the ratemaking standards has been limited (see Exhibit 2.a). Each of the first four standards had been put into effect for about 10 percent of the utilities, and the final two for only about half that number. The cost-of-service, declining-block, and seasonal rates standards had each been put into effect by utilities serving about 16 percent of the total number of customers covered by PURPA; customers covered under the other standards put into effect represented only a fraction of this number.

For each of the ratemaking standards, consideration of the standard had been initiated but a determination whether or not to implement the standard had not yet been made for about 20 percent of the utilities, and the consideration process had not even started for more than 60 percent of the utilities.

State regulatory authorities and nonregulated utilities reported reasonable compliance with all but two of the PURPA procedural requirements. First, opportunity for intervenor compensation was not provided in most cases. Second, some state regulatory authorities and nonregulated utilities indicated that they had not made a determination on whether or not it is appropriate to implement a particular standard to carry out the three purposes of PURPA. Many of the determinations to implement one or more ratemaking standards, as reported by these state regulatory authorities and nonregulated utilities, represented actions taken prior to the enactment of PURPA. Nevertheless, they feel that these standards substantially conform with PURPA requirements.

DOE is concerned that many state regulatory authorities and nonregulated utilities will not be able to complete the consideration process for all the ratemaking standards by the November 1981 deadline established by PURPA. Furthermore, DOE is concerned that the quality and effectiveness of the consideration process may be inadequate in some cases. These concerns arise not only from the lack of progress to date, but also from the need to make substantive progress on the cost-of-service standard as a prerequisite to proper consideration of the other five ratemaking standards. DOE is concerned that some state regulatory authorities may not fully appreciate these interrelationships as demonstrated by the fact that they had not begun the consideration process for the cost-of-service standard for 14 utilities that had put into effect other ratemaking standards. The critical nature of the interrelationships between the cost-of-service standard and the other five ratemaking standards is described more fully below.

Exhibit 2.a

STATUS OF CONSIDERATION PROCESS FOR SIX RATEMAKING STANDARDS

Rate-making Standard	Status					
	Process Not Started	Process Started But No Determination Made	Determination Made to Implement Standard	Standard Put into Effect	Standard Rejected	Total Utilities
Cost-of-Service	206	59	21	30	0	316
Declining-Block Rates	196	58	23	38	1	316
Time-of-Day Rates	197	71	21	25	2	316
Seasonal Rates	208	52	20	29	7	316
Interruptible Rates	213	70	15	17	1	316
Load Management Techniques	221	58	27	10	0	316

### 2.3 INTERRELATIONSHIPS AMONG RATEMAKING STANDARDS

The cost-of-service standard -- in itself a fundamental concept -- lays the groundwork for consideration of the other five ratemaking standards. Essentially, the remaining five ratemaking standards are subsets of the cost-of-service standard. Four represent specific ratemaking approaches aimed at ensuring that the costs of providing service are reflected in electric rates, and the fifth -- load management techniques -- can be effective only if a utility's rates reflect both the cost savings and the extra expenditures involved in putting these techniques into effect.

#### 2.3.1 Interrelationships: Cost-of-Service Standard

The data, costing methodologies, and analytical tools that must be developed to consider the cost-of-service standard properly are all essential to the consideration of the other ratemaking standards. The costing and ratemaking approaches used by a specific state regulatory authority or nonregulated utility will directly influence its determination of the costs and benefits associated with the other standards, and hence the applicability of those standards to each utility's system and customers.

Thus, to consider and make a determination on any of the other five ratemaking standards is, at best, suboptimal (and, at worst, impractical) if a state regulatory authority or nonregulated utility is not at least in the process of considering and making a determination on the cost-of-service standard. Ideally, a determination on the cost-of-service standard should be made, recommended costing methodologies prescribed, and supporting data assembled before a state regulatory authority or nonregulated utility makes its final determination with respect to any of the other ratemaking standards.

To prescribe a cost-of-service methodology, a state regulatory authority or nonregulated utility must address a number of common issues. Specifically, a state regulatory authority or nonregulated utility faces a fundamental question regarding which basic philosophical approach to costing and ratemaking to follow: embedded (accounting) costs or marginal costs.\* The two approaches can be

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\* It should be emphasized that section 115(a) requires, to the extent practicable, the identification of "cost consequences" -- an analytical requirement that is, by definition, not met by an embedded cost method.

used separately or together to develop basic costing and ratemaking parameters. Moreover, many specific methodologies can be adopted under each of the two basic approaches; within each of these methodologies, numerous other issues (e.g., definitions of customer classes and subclasses, identification of seasonal and daily costing periods) must be resolved.

To be able to select which of these basic costing approaches and methodologies to follow, the state regulatory authorities and non-regulated utilities must have detailed demand and energy consumption data by customer class, season, and time of day. The capability to simulate a utility's current and projected costs by season and time of day is also important. Without such data and tools, the state regulatory authorities and nonregulated utilities will be forced to: (1) compromise on the quality of the data they use (e.g., by making assumptions using load data transferred from another utility); (2) make determinations on the basis of incomplete and perhaps inadequate data and analysis; or (3) undertake necessary but time-consuming and expensive programs (e.g., conducting load research, developing simulation models) to ensure the availability of the needed data and tools at some future date. In view of these factors and considering that determinations on the cost-of-service standard may significantly influence a utility's allocation of revenue burdens among customer classes or affect the predictability of customer usage and utility revenue, DOE recognizes that the decision-making process for a state regulatory authority or nonregulated utility to consider and determine the appropriate cost-of-service standard may be lengthy and complex. As described below, however, proper consideration of the other standards is substantially dependent on resolving the issues associated with the cost-of-service standard.

### 2.3.2 Interrelationships: Declining-Block Rates Standard

The second PURPA ratemaking standard -- declining-block rates -- prohibits a utility from using declining-block rates for the energy component of its charges unless the utility can demonstrate that its energy costs in fact decline as a customer's consumption increases. To make such a determination, a utility should define costs by the major functions of cost of service (i.e., generation, transmission, and distribution); identify the customer-, energy-, and demand-related components of each functional cost; and allocate these costs to customer groups served. The determination of cost of service should reflect both time-related and intragroup cost differences (i.e., differences for customers in the same group with different demands and load factors). The effects of customer electricity consumption patterns on the utility's need for expanded peaking, baseload, transmission, and distribution system capacity, as well as the associated costs, should also be identified.

In effect, a state regulatory authority or nonregulated utility must substantially complete the cost-of-service standard consideration process in order to evaluate the declining-block rates standard effectively.

### 2.3.3 Interrelationships: Time-of-Day Rates Standard

The third PURPA ratemaking standard -- time-of-day rates -- requires that, where cost-effective, the rates established for each customer class reflect the utility's costs of providing service by time of day. PURPA specifies that time-of-day rates are to be considered cost-effective when the long-run benefits to the utility and its customers exceed metering and other costs. The design of time-of-day rates that accurately reflect costs also must be based on the detailed cost estimates developed through cost-of-service analyses. Thus, while consideration of the time-of-day standard can proceed in parallel with a state regulatory authority's or nonregulated utility's cost-of-service consideration, it should not precede it.

### 2.3.4 Interrelationships: Seasonal Rates Standard

The fourth PURPA ratemaking standard -- seasonal rates -- requires that rates reflect seasonal differences in the cost of providing service. Determination of these seasonal cost differences is one of the analytical results of a rigorous cost-of-service methodology. Seasonal rates cannot be designed properly, nor can their costs and benefits be determined, without the load and cost data developed through cost-of-service analysis.

### 2.3.5 Interrelationships: Interruptible Rates Standard

The fifth PURPA standard -- interruptible rates -- requires that utilities offer their industrial and commercial customers rates that reflect the cost of providing interruptible service. A utility can determine the costs of interruptible service by estimating the short- and long-run costs that can be avoided by shedding load; these costs savings should then be reflected in the utility's interruptible rates to customers. The cost savings can be determined using the load and operating data a utility develops in performing a rigorous cost-of-service study and, ideally, simulating the utility's costs over a relevant ratemaking and planning horizon. In effect, determining the costs of interruptible service is a matter of extending the analyses required to consider the cost-of-service standard.

### 2.3.6 Interrelationships: Load Management Techniques Standard

The final PURPA ratemaking standard requires that a utility offer its customers load management techniques that are practical, cost-effective, reliable, and useful to the utility in managing energy and capacity requirements. Proper evaluation of the costs and benefits of load management techniques requires detailed cost-of-service information. For example, to determine the costs and benefits of directly controlling air-conditioning loads, a utility must: (1) estimate the effects of such load control on its load patterns by time of day; (2) identify the associated changes in its current operating costs and future capacity requirements; and (3) translate these cost effects into proper rates for those customers whose air-conditioning loads are being controlled. More generally, evaluating load management techniques extends the cost analysis associated with consideration of the cost-of-service standard.

## 2.4 STATUS OF CONSIDERATION PROCESS

In the following sections, we discuss the status of the consideration process (as of June 30, 1979) for each ratemaking standard, as reported by the state regulatory authorities and nonregulated utilities.

### 2.4.1 Status of Consideration Process: Cost-of-Service Standard

Although its consideration is key to the consideration of the other ratemaking standards, the cost-of-service standard had been put into effect by only 27 regulated and 3 nonregulated electric utilities covered by PURPA; a determination to implement the standard had been made for another 21 regulated utilities (see Exhibit 2.b). The consideration process had not yet begun for almost two-thirds of the covered utilities. Those state regulatory authorities and non-regulated utilities that had made a determination on the standard (to implement or reject) and reported they had not fulfilled the PURPA procedural requirements are identified in Exhibit 2.c.

Nationwide, this standard had been put into effect for 12 million customers (see Exhibit 2.d). Customers covered represented about one-seventh of all customers served by regulated utilities and about 22 percent of all customers served by nonregulated utilities. The percentage of customers covered was larger than the percentage of utilities which had put the standard into effect because the 8 state

Exhibit 2.b

STATUS OF CONSIDERATION PROCESS FOR THE COST-OF-SERVICE STANDARD

Type of Utility	Status					Total
	Process Not Started	Process Started But No Determination Made	Determination Made to Implementation Standard	Standard Put into Effect	Standard Rejected	
Regulated Electric	152	54	21	27	0	254
Nonregulated Electric	54	5	0	3	0	62
Total	206	59	21	30	0	316

Exhibit 2.c  
 NONCOMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: OCST-OF-SERVICE STANDARD\*

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation	4.4 Opportunity for intervenor compensation	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination	4.10	4.11 Determination made available to public
CA California PSC Anaheim Electric Division L.A. Dept. of Water & Power	6	1	1								
MI Lansing Board of Water & Light	1						1				
MN Minnesota	1										
NY New York	1										
NC No. Carolina	1				2						
OH Ohio PUC							6				
OR Oregon PU Commissioner	4										
PA Pennsylvania PUC					6	5					
SC So. Carolina PSC	1				3						
SD So. Dakota PSC	1										
VT Vermont PSC	2										
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>26</b>	<b>0</b>	<b>11</b>	<b>5</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

Exhibit 2.d

CUSTOMERS COVERED BY THE COST-OF-SERVICE STANDARD

Type of Utility	Customer Group	Customers Covered Nationwide (000)	Customers Covered as a Percentage of All Customers	Customers Covered as a Percentage of Customers Served by Utilities Which Had Put the Standard into Effect
Regulated Electric	Residential	9,541.9	15.4	98.9
	Commercial & Industrial	1,224.7	13.5	98.9
	Other	5.6	1.1	35.0
Nonregulated Electric	Residential	1,138.5	22.3	100.0
	Commercial & Industrial	168.1	26.8	100.0
	Other	5.7	8.3	100.0
Total	Residential	10,680.4	15.9	99.0
	Commercial & Industrial	1,392.8	14.3	99.1
	Other	11.3	2.0	52.1

authorities regulating these utilities and the 3 nonregulated utilities were among the nation's largest.\*

As noted, most state regulatory authorities and nonregulated utilities had not yet started the consideration process. The process had been started but no determination made for 21 percent of regulated utilities and by 8 percent of nonregulated utilities. No state regulatory authority or nonregulated utility had considered and rejected the cost-of-service standard.

The state regulatory authorities and nonregulated utilities reported that they had complied reasonably well with PURPA requirements in prescribing recommended costing methodologies and identifying specific types of costs. Specifically, an analysis of the adequacy of the cost-determination process indicates that only one PSC (Utah) failed to prescribe some costing methodology as required by Section 115(a) of PURPA (see Exhibit 2.e). Accounting methodologies were prescribed most often. In all but one case in which a marginal-cost methodology was prescribed, the marginal-cost methodology supplemented an accounting-cost methodology (the methodology traditionally used in performing cost-of-service studies). The only exception was the state regulatory authority in Oregon, which prescribed a methodology based solely on future and marginal costs.

Regarding the more specific requirements of Section 115(a):

- Each of the entities making a determination to implement the standard required the allocation of costs to major customer groups.
- A methodology to identify marginal costs was prescribed for about half the utilities that had put the standard into effect or for which a determination had been made to implement the standard.
- All utilities covered by the standard (except the regulated utilities in California and Utah) were required to identify major cost components (demand, energy, and customer).
- Time-related cost differentials were required to be identified for about one-third of the 51 utilities covered by the standard.\*\*

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\* The state regulatory authorities are those in Minnesota, New York, Oregon, Pennsylvania, South Carolina, South Dakota, Wisconsin, and Vermont. The nonregulated utilities are the Anaheim Electric Division, Los Angeles Department of Water & Power, and Lansing Board of Water and Light.

\*\* No response was provided in the California PUC's report to DOE concerning the identification of time-related cost differentials. Using follow-up telephone interviews, DOE found that time-related cost differentials had not been estimated for the utilities under its jurisdiction.

Exhibit 2.e

CHARACTERISTICS OF COST-OF-SERVICE STANDARDS\*

Report- ing Entity	State or Utility	Number of Utilities Regulated	Number of Utilities Covered by Cost-of-Service Standard	Costing Methodology Prescribed			Cost Allocated to Major Customer Groups		Customer, Demand, and Energy Cost Components Identified		Time-Related Cost Differential Identified		Load Research Data Required			
				Accounting Cost	Future Cost	Marginal Cost	Yes	No	Yes	No	Yes	No	Only System	Trans- ferred Only	Mixed	None
PSC	California	6	6	6	6	6	6	0	0	6	0	6	6	0	0	0
	Colorado	3	3	3	0	0	3	0	3	0	0	3	3	0	0	0
	Minnesota	4	2	2	0	2	2	0	2	0	0	2	0	0	2	0
	New York	7	3	3	2	3	3	0	3	0	2	1	3	0	0	0
	North Carolina	3	3	3	0	3	3	0	3	0	3	0	1	0	2	0
	Ohio	8	6	6	0	0	6	0	6	0	0	6	0	0	6	0
	Oregon	4	4	0	4	4	4	0	4	0	4	0	0	0	4	0
	Pennsylvania	8	6	6	2	0	6	0	6	0	0	6	0	0	6	0
	South Carolina	3	3	3	0	0	3	0	3	0	0	3	0	0	3	0
	South Dakota	6	1	1	0	1	1	0	1	0	0	1	0	0	1	0
	Utah	3	3	0	0	0	3	0	0	3	0	3	0	0	0	3
	Vermont	2	2	2	0	2	2	0	2	0	0	2	0	0	2	0
	Wisconsin	6	6	6	6	6	6	0	6	0	6	0	0	0	6	0
	<b>SUBTOTAL</b>	<b>63</b>	<b>48</b>	<b>41</b>	<b>20</b>	<b>27</b>	<b>48</b>	<b>0</b>	<b>39</b>	<b>9</b>	<b>15</b>	<b>33</b>	<b>13</b>	<b>0</b>	<b>32</b>	<b>3</b>
Nonregulated Utility																
	Anaheim Elec- tric Division	NA	1	1	1	0	1	0	1	0	0	1	0	1	0	0
	Los Angeles Department of Water & Power	NA	1	1	0	1	1	0	1	0	1	0	1	0	0	0
	Lansing Board of Water & Light	NA	1	1	1	0	1	0	1	0	0	1	0	0	1	0
	<b>SUBTOTAL</b>	<b>NA</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>3</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>0</b>
	<b>TOTAL</b>	<b>NA</b>	<b>51</b>	<b>44</b>	<b>22</b>	<b>28</b>	<b>51</b>	<b>0</b>	<b>42</b>	<b>9</b>	<b>16</b>	<b>35</b>	<b>14</b>	<b>1</b>	<b>33</b>	<b>3</b>

\* Includes standards that utilities put into effect and standards for which a determination to implement has been made by the state regulatory authority or nonregulated utility.

- Own-system load research data were required for all customer classes for about 27 percent of the 51 utilities, and for some or all customer classes for about 90 percent of these utilities. Load research data compiled by and transferred from other utilities or obtained at least in part from another jurisdiction served by the same utility were used at least in part for two-thirds of the utilities and used exclusively for one utility.\*

Own-system load research data developed from statistically reliable sampling procedures are usually considered to be more indicative of the loads and usage patterns of a utility's customers than data transferred or borrowed from another utility. Data transferred from another utility's load research program have to be normalized to the borrowing utility's time-of-use load profiles and to the demand contributions of each customer group. Thus, in reviewing the types of load research data required for the 51 utilities, it seems reasonable to assume that the 27 percent of these utilities using only own-system data have more reliable load research data for use in developing cost-of-service allocation factors than the 65 percent of these utilities using a mixture of own-system and transferred load research data.

However, the information provided in Form ERA-166 is insufficient to determine precisely what a state regulatory authority or nonregulated utility meant when it indicated the use of both own-system and transferred data. Specifically, mixed data can take two forms. First, a utility may have own-system load research data for only some of its customer groups. For example, a utility may have own-system data for its larger-usage customer groups (e.g., industrial customers), whose usage is measured by time-of-use metering equipment, but not for its smaller-usage customer groups (e.g., residential), whose usage is typically measured by kWh meters. Data for these smaller-usage customer groups may be transferred from another utility that has customers with similar load patterns and usage characteristics. Second, a multistate or multijurisdictional utility may have own-system data for each of its major customer groups, but the data for specific customer groups may be collected jointly from customers served in more than one regulatory jurisdiction. In such cases, the data are essentially own-system data, but may be identified as own-system plus transferred because they include data collected from customers located outside the state regulatory authority's jurisdiction.

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\* Anaheim (CA) Electric Division (nonregulated).

Although the state regulatory authorities and nonregulated utilities that have made a determination to implement the cost-of-service standard reported that they had met PURPA requirements, other data submitted with ERA Form-166 indicated that the consideration process and subsequent rulings on the standard may have been inadequate in some cases. Specifically, under PURPA Section 111(a), each state regulatory authority and nonregulated utility is required to determine whether it is appropriate to implement the cost-of-service standard to achieve the conservation, efficiency, and equity purposes of PURPA. This determination had been made for only two-thirds of the 51 utilities for which a determination to implement the standard had been made. DOE's analysis of the supplementary information filed with the PURPA reports also indicates that none of the state regulatory authorities and nonregulated utilities empirically estimated the conservation, efficiency, and equity impacts of this or any other standard. Consideration of these impacts generally took the form of theoretical discussions rather than quantitative analysis.

2.4.2 Status of Consideration Process:  
Declining-Block Rates Standard

The declining-block rates standard had been put into effect by 12 percent of the nation's utilities subject to the requirements of PURPA (Exhibit 2.f): 36 regulated and 2 nonregulated utilities. Only one nonregulated utility had considered and rejected the standard.\* State regulatory authorities and nonregulated utilities had started the consideration process but not yet made a determination for 21 percent of regulated utilities and 8 percent of nonregulated utilities. More importantly, consideration had not been started for almost 62 percent of the utilities (including 87 percent of the nonregulated utilities).

Despite the fact that a determination on the cost-of-service standard is essentially a prerequisite to a proper determination on the other ratemaking standards, a determination on the declining-block rates standard had been made for 17 utilities for which a determination had yet to be made on the cost-of-service standard. Specifically, before deciding to implement the PURPA declining-block rates standard, a state regulatory authority or nonregulated utility should identify the customer-, energy-, and demand-related components of each functional cost and allocate these costs by customer class; that is, substantially complete the process of considering and implementing the cost-of-service standard. Thus, although the standard

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\* Lansing (MI) Board of Water and Light (nonregulated).

Exhibit 2.f

STATUS OF CONSIDERATION PROCESS FOR THE DECLINING-BLOCK RATES STANDARD

Type of Utility	Status					Total
	Process Not Started	Process Started But No Determination Made	Determination Made to Implement Standard	Standard Put into Effect	Standard Rejected	
Regulated Electric	142	53	23	36	0	254
Nonregulated Electric	54	5	0	2	1	62
Total	196	58	23	38	1	316

implemented may prohibit or restrict declining-block energy rates, if the major cost components have not been adequately identified, prohibition or restriction may not result in rates that reflect actual cost of service.

The characteristics of the declining-block rates standards that state regulatory authorities have decided to implement or that utilities had put into effect (delineated in Exhibit 2.g) show considerable variation in the approaches taken to rate design and cost allocation under the standard. Most of the standards implemented require the recovery of both capacity and energy costs through the energy component of declining-block rates. For example, the standards for 55 of the 61 utilities do not require separate demand and customer charges in residential rates; the standards for 42 of the utilities do not require an energy rate (i.e., kWh rate) based solely on energy costs for residential customers.

Those state regulatory authorities and nonregulated utilities that had made a determination on the standard but reported not fulfilling all the PURPA procedural requirements are highlighted in Exhibit 2.h.

Nationwide, about 17 percent of all customers were covered by utilities that had put the standard into effect (see Exhibit 2.i). Because the standard had been put into effect by two of the largest nonregulated utilities (Anaheim Electric Division and Los Angeles Department of Water and Power), the percentage of customers covered vis-a-vis customers served is substantially higher for nonregulated utilities, despite the overall lack of progress by nonregulated utilities in beginning their consideration of this standard. Application of the standard to different customer groups is fairly uniform.

To monitor the impacts of putting this standard into effect, state regulatory authorities and nonregulated utilities chose primarily to focus on the impacts on revenue levels (see Exhibit 2.j). The choice of this monitoring method reflects their awareness that such rate design changes (from declining-block to flat rates) can significantly affect the levels of revenue collected from different customer groups as well as from different types of customers within a particular group.

#### 2.4.3 Status of Consideration Process: Time-of-Day Rates Standard

The time-of-day rates standard had been put into effect by 22 regulated and 3 nonregulated utilities (see Exhibit 2.k). However, 5 state regulatory authorities (Connecticut, Minnesota, Ohio, Pennsylvania, and Washington, D.C.) had made a determination to implement the time-of-day rates standard for 8 utilities without

Exhibit 2.g

CHARACTERISTICS OF DECLINING-BLOCK RATES STANDARDS\*

Schedule 3, Question 11: Does your declining-block rates standard require the following:

State Utility (type)	11.1 Recovery of the following costs through the energy component of the declining-block rate:									11.2 Separate demand and customer charges used for:				11.3 An energy rate which is based on charges in energy costs alone for:				
	11.11 Fuel and purchased power	11.12 Production operation expenses. (other than fuel costs and purchased power)	11.13 Production maintenance expenses	11.14 Operation and maintenance expenses (other than production)	11.15 Capacity costs (generation and transmission)	11.16 Property taxes	11.17 Return and associated income taxes	11.18 Taxes (other than income on property taxes)	11.19 Special facilities costs		11.21 Residential rates	11.22 Commercial rates	11.23 Industrial rates	11.24 Other		11.31 Residential class	11.32 Commercial class	11.33 Industrial class
CA Generic (6 REI)	N	N	N	N	N	N	N	N	N	H	Y	Y	Y		N	N	N	N
Anaheim Electric Div. (NEP)	Y	Y	Y	Y	Y	N	Y	N	N	H	Y	Y	N		N	Y	Y	N
Los Angeles DW&P (MEP)	N	N	N	N	N	N	N	N	N	H	Y	Y	N		N	N	N	N
CO Generic (2 REI, 1 REP)	N	N	N	N	N	N	N	N	N	H	Y	N	na		N	N	N	na
ME Central Maine Power (REI)	N	Y	Y	Y	Y	Y	Y	Y	N	H	Y	Y	na		N	Y	Y	na
MI Northern States Power (REI)	N	N	N	Y	Y	Y	Y	Y	Y	N	Y	Y	Y		N	N	Y	N
Otter Tail Power (REI)	N	N	N	Y	Y	Y	Y	Y	Y	N	Y	Y	N		N	N	Y	N
Minnesota P&L (REI)	N	N	N	Y	Y	Y	Y	Y	Y	H	Y	Y	Y		N	N	Y	Y
NC Carolina Power & Light (REI)	Y	Y	N	N	N	N	N	N	N	H	Y	Y	na		Y	Y	Y	na
Duke Power Co. (REI)	Y	Y	N	N	N	N	N	N	N	H	Y	Y	na		Y	Y	Y	na
Virginia Electric & Power (REI)	Y	Y	N	N	N	N	N	N	N	N	Y	Y	na		Y	Y	Y	na
OH Cincinnati Gas & Electric (REI)	Y	Y	Y	N	N	N	N	N	N	N	Y	Y	na		Y	Y	Y	na
Cleveland Elec. Illuminating (REI)	Y	Y	Y	N	N	N	N	N	N	N	Y	Y	na		Y	Y	Y	na
Columbus & So. Ohio Elec. (REI)	Y	Y	Y	N	N	N	N	N	N	N	Y	Y	na		Y	Y	Y	na
Dayton P&L (REI)	Y	Y	Y	N	N	N	N	N	N	N	Y	Y	na		Y	Y	Y	na
Monongahela Power (REI)	Y	Y	Y	N	N	N	N	N	N	N	Y	Y	na		Y	Y	Y	na
Ohio Edison (REI)	Y	Y	Y	N	N	N	N	N	N	N	Y	Y	na		Y	Y	Y	na
Ohio Power Co. (REI)	Y	Y	Y	N	N	N	N	N	N	N	Y	Y	na		Y	Y	Y	na
Toledo Edison Co. (REI)	Y	Y	Y	N	N	H	N	N	N	N	Y	Y	na		Y	Y	Y	na

(continued next page)

N: no  
Y: yes  
na: no answer

REI: Regulated electric, investor-owned  
REP: Regulated electric, publicly owned  
REC: Regulated electric, cooperative

NEI: Nonregulated electric, investor-owned  
NEP: Nonregulated electric, publicly owned  
NEC: Nonregulated electric, cooperative

\* Includes standards that utilities put into effect and standards for which a determination to implement has been made by the state regulatory authority or nonregulated utility.

CHARACTERISTICS OF DECLINING-BLOCK RATES STANDARDS\*

Schedule 3. Question 11: Does your declining-block rates standard require the following:

State Utility (type)	11.1 Recovery of the following costs through the energy component of the declining-block rate:									11.2 Separate demand and customer charges used for:				11.3 An energy rate which is based on changes in energy costs alone for:					
	11.11 Fuel and purchased power	11.12 Production operation expenses (other than fuel costs and purchased power)	11.13 Production maintenance expenses	11.14 Operation and maintenance expenses (other than production)	11.15 Capacity costs (generation and transmission)	11.16 Property taxes	11.17 Return and associated income taxes	11.18 Taxes (other than income on property taxes)	11.19 Special facilities costs		11.21 Residential rates	11.22 Commercial rates	11.23 Industrial rates	11.24 Other		11.31 Residential class	11.32 Commercial class	11.33 Industrial class	11.34 Other
OR CP National (REI)	Y	Y	Y	Y	Y	Y	Y	Y	N		N	Y	Y	na		N	Y	Y	na
Idaho Power (REI)	Y	Y	Y	Y	Y	Y	Y	Y	N		N	Y	Y	na		N	Y	Y	na
Pacific Power Light (REI)	Y	Y	Y	Y	Y	Y	Y	Y	N		N	Y	Y	na		N	Y	Y	na
Portland General Electric (REI)	Y	Y	Y	Y	Y	Y	Y	Y	N		N	Y	Y	na		N	Y	Y	na
PA Duquesne Light Co. (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y		N	Y	Y	na		Y	Y	Y	na
Metropolitan Edison (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y		N	Y	Y	na		Y	Y	Y	na
Pennsylvania Electric (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	na		Y	Y	Y	na
Pennsylvania Power (REI)	Y	N	N	N	N	Y	Y	Y	Y		Y	Y	Y	na		Y	Y	Y	na
Penn. Power & Light (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	na		Y	Y	Y	na
Philadelphia Elec. (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	na		Y	Y	Y	na
UGI-Luzerne Elec. Div. (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	na		Y	Y	Y	na
West Penn. Power (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	na		Y	Y	Y	na
SC Carolina Power & Light (REI)	Y	Y	Y	Y	Y	Y	Y	Y	N		N	Y	Y	na		N	N	N	na
Duke Power Co. (REI)	Y	Y	Y	Y	Y	Y	Y	Y	N		N	Y	Y	na		N	N	N	na
South Carolina E&G (REI)	Y	Y	Y	Y	Y	Y	Y	Y	N		N	Y	Y	na		N	N	N	na
SD Northwestern PS (REI)	Y	Y	Y	N	Y	Y	Y	Y	Y		N	Y	Y	N		N	N	Y	N

(continued next page)

N: no  
 Y: yes  
 na: no answer

REI: Regulated electric, investor-owned  
 REP: Regulated electric, publicly owned  
 REC: Regulated electric, cooperative

NEI: Nonregulated electric, investor-owned  
 NEP: Nonregulated electric, publicly owned  
 NEC: Nonregulated electric, cooperative

\* Includes standards that utilities have put into effect and standards for which a determination to implement has been made by the state regulatory authority or nonregulated utility.

CHARACTERISTICS OF DECLINING-BLOCK RATES STANDARDS\*

Schedule 3. Question 11: Does your declining-block rates standard require the following:

State Utility (type)	11.1 Recovery of the following costs through the energy component of the declining-block rate:											11.2 Separate demand and customer charges used for:				11.3 An energy rate which is based on changes in energy costs alone for:			
	11.11 Fuel and purchased power	11.12 Production operation expenses (other than fuel costs and purchased power)	11.13 Production maintenance expenses	11.14 Operation and maintenance expenses (other than production)	11.15 Capacity costs (generation and transmission)	11.16 Property taxes	11.17 Return and associated income taxes	11.18 Taxes (other than income on property taxes)	11.19 Special facilities costs	11.21 Residential rates	11.22 Commercial rates	11.23 Industrial rates	11.24 Other	11.31 Residential class	11.32 Commercial class	11.33 Industrial class	11.34 Other		
TX	Central Power & Light (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	na	N	N	N	na	
	Community Public Service (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	na	N	N	N	na	
	Dallas P&L (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	na	N	N	N	na	
	El Paso Electric Co. (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	na	N	N	N	na	
	Gulf States Utilities (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	na	N	N	N	na	
	Houston L&P (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	na	N	N	N	na	
	Southwestern Elec. Service (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	na	N	N	N	na	
	Southwestern Public Service (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	na	N	N	N	na	
	Texas Electric Service (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	na	N	N	N	na	
	Texas P&L (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	na	N	N	N	na	
	Lower Colorado River Authority (REP)	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	na	N	N	N	na	
VT	Central Vt. PS (REI)	Y	Y	Y	Y	N	N	N	N	N	N	N	Y	Y	N	Y	Y	na	
	Green Mountain Power (REI)	Y	Y	Y	Y	N	N	N	N	N	N	N	Y	na	N	Y	Y	na	
WI	Lake Superior Dist. Pwr. (REI)	Y	Y	Y	N	N	N	N	N	N	N	N	N	na	N	N	N	na	
	Madison Gas & Electric (REI)	Y	Y	Y	N	N	N	N	N	N	N	N	N	na	N	N	N	na	
	Northern States Power (REI)	Y	Y	Y	N	N	N	N	N	N	N	N	N	na	N	N	N	na	
	Wisconsin Electric Power (REI)	Y	Y	Y	N	N	N	N	N	N	N	N	N	na	N	N	N	na	
	Wisconsin Power & Light (REI)	Y	Y	Y	N	N	N	N	N	N	N	N	N	na	N	N	N	na	
	Wisconsin Public Service (REI)	Y	Y	Y	N	N	N	N	N	N	N	N	N	na	N	N	N	na	
TOTAL	61 Utilities	YES:	47	47	44	32	31	31	32	31	23	6	50	52	9	19	27	31	1
		NO:	14	14	17	29	30	30	29	30	38	55	11	9	4	42	34	30	11
		na:																	49

N: no  
Y: yes  
na: no answer

REI: Regulated electric, investor-owned  
REP: Regulated electric, publicly owned  
REC: Regulated electric, cooperative

NEI: Nonregulated electric, investor-owned  
NEP: Nonregulated electric, publicly owned  
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\* Includes standards that utilities have put into effect and standards for which a determination to implement has been made by the state regulatory authority or nonregulated utility.

NON-COMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: DECLINING-BLOCK RATES STANDARD\*

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation	4.4 Opportunity for intervenor compensation	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination	4.10	4.11 Determination made available to public
CA California PSC				6		6					
Anaheim Electric Division				1							
L.A. Dept. of Water & Power				1		1					
ME Maine				1							
MI Lansing Board of Water & Light				1		1					
MN Minnesota				2							
NC No. Carolina				3		2					
OH Ohio PUC							8				
OR Oregon PU Commissioner				4							
PA Pennsylvania PUC						7	7				
SC So. Carolina PSC				3		3					
SD So. Dakota PSC				1							
TX Texas PUC				11							
VT Vermont PSC				2							
<b>Total</b>	0	0	0	36	0	28	7	0	0	0	0

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

Exhibit 2.1

CUSTOMERS COVERED BY THE DECLINING-BLOCK RATES STANDARD

Type of Utility	Customer Group	Customers Covered Nationwide (000)	Customers Covered as a Percentage of All Customers	Customers Covered as a Percentage of Customers Served by Utilities Which Had Put the Standard into Effect
Regulated Electric	Residential	10,493.2	16.9	99.9
	Commercial & Industrial	1,392.4	15.3	100.0
	Other	5.9	1.2	30.2
Nonregulated Electric	Residential	1,073.5	21.0	100.0
	Commercial & Industrial	158.7	25.3	100.0
	Other	5.7	8.3	100.0
Total	Residential	11,566.7	17.2	99.9
	Commercial & Industrial	1,551.1	15.9	100.0
	Other	11.6	2.0	46.0

Exhibit 2.j

METHODS SELECTED TO MONITOR EFFECTS OF IMPLEMENTING THE DECLINING-BLOCK RATES STANDARD

Type of Utility	Monitoring Methods*				
	Consumer Questionnaire	Follow-up Public Hearings	Changes in System Characteristics	Revenue Levels	Other
Regulated Electric	0.0	22.0	25.4	49.2	18.6
Nonregulated Electric	50.0	50.0	100.0	100.0	0.0

\* Percentage of utilities for which a determination to implement standard had been made.

Exhibit 2.k

STATUS OF CONSIDERATION PROCESS FOR THE TIME-OF-DAY RATES STANDARD

Type of Utility	Status					Total
	Process Not Started	Process Started But No Determination Made	Determination Made to Implement Standard	Standard Put into Effect	Standard Rejected	
Regulated Electric	143	67	21	22	1	254
Nonregulated Electric	54	4	0	3	1	62
Total	197	71	21	25	2	316

making a determination regarding the cost-of-service standard for them. Similarly, the nonregulated utility in Ohio (Cleveland, Division of Light and Power) that had put the time-of-day rates standard into effect had not yet made a determination on the cost-of-service standard.

Most state regulatory authorities and nonregulated utilities had not started the consideration process for this standard. The consideration process had been started but no determination on the standard had been made for 67 regulated utilities and 4 nonregulated utilities. The standard had been considered and rejected for one regulated utility (Minnesota Power and Light) and one nonregulated utility (Anaheim Electric Division).

The characteristics of the time-of-day rate standards put into effect or to be put into effect (delineated in Exhibit 2.1) show a diversity of approaches to rate design. For example, there is no consistent pattern in the number of time periods to which time-differentiated demand and energy charges are applicable. Those state regulatory authorities and nonregulated utilities that had made a determination on the standard but whose reports to DOE indicated they had not fully complied with the PURPA procedural requirements are identified in Exhibit 2.m.

As of June 30, 1979, about 4 million customers were covered by the time-of-day rates standard (see Exhibit 2.n). Many state regulatory authorities and nonregulated utilities reported the number of customers actually covered (i.e., billed) under time-of-day rates, whether on a mandatory or voluntary basis, while others appear to have reported the number of customers eligible for voluntary time-of-day rates. For this reason, the number of customers covered by the standard cannot be accurately estimated. As shown in Exhibit 2.o, time-of-day rates are currently provided almost three times as often on a voluntary basis as on a mandatory basis, whether to the commercial and industrial customer groups or to the residential customer group. (Under a voluntary plan, the customer may choose to be billed under either the time-of-day rate or the rate that is normally applicable to the appropriate customer group). This result is somewhat surprising, because commercial and industrial customers have much lower time-of-day metering costs relative to total electricity costs than residential customers, and thus time-of-day rates are more likely to be cost-effective when applied to all customers in these classes (i.e., on a mandatory basis).

The costs and benefits of implementing time-of-day rates had been determined for fewer than 40 percent of the utilities for which a determination to implement the standard had been made (see Exhibit 2.p). These results indicate that time-of-day rates put

Exhibit 2.1

CHARACTERISTICS OF TIME-OF-DAY RATES STANDARDS\*

Schedule 4, Question 11: Does your time-of-day rates standard require the following:

State	Utility (type)	11.1 A demand charge for:			11.2 An energy charge for:			11.3	
		11.11 One period	11.12 Two periods	11.13 Three periods or more	11.21 One period	11.22 Two periods	11.23 Three periods or more	A customer charge	
CA	Generic (6 REI)	N	Y	Y	N	Y	Y	Y	
	Los Angeles DP&W	Y	N	N	N	Y	N	Y	
CO	Generic (2 REI, 1 REP)	Y	N	N	Y	N	N	Y	
CT	Generic (3 REI)	Y	N	N	N	Y	N	Y	
DC	Potomac Electric Power (REI)	N	N	Y	N	N	Y	Y	
MI	Lansing Board of W&L (NEP)	N	Y	N	N	Y	N	N	
MN	Northern States Power (REI)	N	Y	N	N	Y	N	Y	
	Otter Tail Power Co. (REI)	N	Y	N	Y	N	Y	Y	
NY	Central Hudson G&E (REI)	N	Y	N	Y	N	N	N	
	Consolidated Edison of NY (REI)	N	Y	N	N	N	Y	N	
	Long Island Lighting (REI)	N	N	Y	N	N	Y	N	
OH	Cincinnati Gas & Electric (REI)	N	N	N	N	N	N	N	
	Cleveland Elec. Illuminating (REI)	N	N	N	N	N	N	N	
	Columbus & So. Ohio Electric (REI)	Y	N	N	Y	N	N	Y	
	Dayton P&L (REI)	Y	N	N	Y	N	N	Y	
	Monongahela Power (REI)	N	N	N	N	N	N	N	
	Ohio Edison (REI)	Y	N	N	Y	N	N	Y	
	Ohio Power Co. (REI)	Y	N	N	Y	N	N	Y	
	Toledo Edison Co. (REI)	Y	N	N	Y	N	N	Y	
	Cleveland, Div. of I&P (NEP)	N	Y	N	Y	N	N	Y	
OR	Generic (2 REI)	N	N	Y	Y	N	N	Y	
	Pacific Power & Light (REI)	N	N	Y	Y	N	N	Y	
	Portland General Electric (REI)	N	N	Y	Y	N	N	Y	
PA	Duquesne Light Co. (REI)	N	Y	N	Y	N	N	Y	
	Metropolitan Edison (REI)	N	Y	N	Y	Y	N	Y	
	Pennsylvania Electric (REI)	N	Y	N	Y	Y	N	Y	
	Pennsylvania Power (REI)	N	Y	N	Y	N	N	N	
	Philadelphia Elec. (REI)	N	Y	N	Y	N	N	Y	
	UGI-Luzerne Elec. Div. (REI)	N	Y	N	Y	Y	N	Y	
	West Penn. Power (REI)	N	Y	N	Y	N	N	N	
VT	Central Vermont PS (REI)	N	Y	N	N	Y	N	Y	
	Green Mountain Power (REI)	N	Y	N	N	Y	N	Y	
WI	Lake Superior Dist. Pwr. (REI)	N	N	N	N	N	N	N	
	Madison Gas & Electric (REI)	N	N	Y	N	N	Y	Y	
	Northern States Power (REI)	Y	N	N	N	Y	N	Y	
	Wisconsin Electric Power (REI)	N	Y	N	N	N	Y	Y	
	Wisconsin Power & Light (REI)	Y	N	N	N	Y	N	Y	
	Wisconsin Public Service (REI)	N	N	Y	N	N	Y	Y	
TOTAL	46 Utilities	YES:	14	22	12	20	19	13	36
		NO:	32	24	34	26	27	33	10

N: no  
Y: yes

REI: Regulated electric, investor-owned  
REP: Regulated electric, publicly owned  
REC: Regulated electric, cooperative

NEI: Nonregulated electric, investor-owned  
NEP: Nonregulated electric, publicly owned  
NEC: Nonregulated electric, cooperative

\* Includes standards that utilities have put into effect and standards for which a determination to implement has been made by the state regulatory authority or nonregulated utility.

NONCOMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: TIME-OF-DAY RATES STANDARD\*

State Regulatory Authority or Utility		4.1	4.2	4.3	4.4	4.5	4.6	4.7	4.8	4.9	4.10	4.11
		Prior public notice of hearing(s)	Hearing(s) open to the public	Opportunity for intervenor participation	Opportunity for intervenor compensation	Testimony or other evidence taken	Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA	Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA	Decision rendered based upon findings included in such determination and evidence presented during hearing	Written determination		Determination made available to public
CA	California PSC Anahelm Electric Division L.A. Dept. of Water & Power				6	1	6					
CT	Connecticut PUC				3							
DC	District of Columbia				1							
MI	Lansing Board of Water & Light				1							
MN	Minnesota				2							
NY	New York				3							
OH	Cleveland Div. of Light & Power	1	1	1	1	1	1		1			
OR	Oregon PU Commissioner				2							
PA	Pennsylvania PUC						7					
VT	Vermont PSC				2							
TOTAL		2	1	1	23	1	15	0	1	0		0

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

Exhibit 2.n

CUSTOMERS COVERED BY THE TIME-OF-DAY RATES STANDARD

Type of Utility	Customer Group	Customers Covered Nationwide (000)	Customers Covered as a Percentage of All Customers	Customers Covered as a Percentage of Customers Served by Utilities Which Had Put the Standard into Effect
Regulated Electric	Residential	2,604.1	4.2	33.5
	Commercial & Industrial	641.8	7.1	70.8
	Other	5.3	1.1	35.8
Nonregulated Electric	Residential	1,004.3	19.6	90.6
	Commercial & Industrial	50.6	24.0	91.3
	Other	5.2	7.5	100.0
Total	Residential	3,608.4	5.4	40.6
	Commercial & Industrial	792.4	8.2	73.9
	Other	10.5	1.8	52.5

Exhibit 2.o

TYPE OF COVERAGE UNDER TIME-OF-DAY RATES

Type of Utility	Customer Group	Voluntary Coverage		Mandatory Coverage		Total	
		Number (000)	Percent	Number (000)	Percent	Number	Percent
Regulated Electric	Residential	1,559.5	59.9	1,044.6	40.1	2,604.1	100.0
	Commercial & Industrial	524.7	81.7	117.1	18.3	641.8	100.0
	Other	5.3	100.0	0.0	0.0	5.3	100.0
Nonregulated Electric	Residential	1,004.3	100.0	0.0	0.0	1,004.3	100.0
	Commercial & Industrial	20.4	13.6	130.2	86.4	150.6	100.0
	Other	5.2	100.0	0.0	-	5.2	100.0
Total	Residential	2,563.8	71.1	1,044.6	28.9	3,608.4	100.0
	Commercial & Industrial	545.1	68.8	247.3	31.2	792.4	100.0
	Other	10.5	100.0	0.0	0.0	10.5	100.0
	TOTAL	3,249.3	73.7	1,161.6	26.3	4,410.9	100.0

Exhibit 2.p  
ELECTRIC UTILITIES FOR WHICH THE COSTS  
AND BENEFITS OF IMPLEMENTING THE TIME-  
OF-DAY RATES STANDARD HAD BEEN DETERMINED

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Type of Utility	Costs and Benefits Determined	
Regulated Electric	Yes	40.9%*
	No	59.1%
Nonregulated Electric	Yes	0.0%
	No	100.0%

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\* Percentage of utilities for which a determination to implement the standard had been made.

into effect by about 60 percent of the covered utilities may not meet the cost-effectiveness test set forth in Section 115(b) of PURPA.

As discussed in more detail in Chapter 5, one of DOE's major rate-related activities in recent years has been the funding of time-of-day rate experiments conducted by 16 state regulatory authorities and nonregulated utilities.\* Of these, 7 had made determinations to implement the time-of-day rates standard. The remaining state regulatory authorities and nonregulated utilities had delayed hearings on the standard until relevant statistical tests using data from the rate experiments have been performed and the results of the tests published. DOE plans to complete these analyses and publish the experimental results by mid-1980.

#### 2.4.4 Status of Consideration Process: Seasonal Rates Standard

The seasonal rates standard had been put into effect by only 27 of the 254 regulated utilities and by only 2 of the 62 nonregulated utilities (see Exhibit 2.q). The consideration process had not yet been started for 153 regulated and 55 nonregulated utilities. The standard has been considered and rejected for Minnesota Power and Light, Pennsylvania Electric Company, Pennsylvania Power Company, Lake Superior District Power (Wisconsin), Northern States Power Company (Wisconsin), Wisconsin Power & Light, and Anaheim Electric Division. Those state regulatory authorities and nonregulated utilities that had made a determination on the standard but reported not fully complying with the PURPA procedural requirements are identified in Exhibit 2.r.

The standard had been put into effect for about 17 percent of regulated utilities' customers but fewer than 1 percent of nonregulated utilities' customers (see Exhibit 2.s). The principal method chosen to monitor the impacts of putting the standard into effect has been a review of the standard's impacts on system operating characteristics (see Exhibit 2.t).

This choice indicates widespread awareness, by state regulatory authorities and nonregulated utilities that had made a determination to implement the standard, of the standard's potential impacts on the efficient utilization of existing plant and equipment and on a

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\* One of the nonregulated utilities receiving funding for time-of-day rate experiments is not covered by PURPA. Thus, only 15 of the state regulatory authorities and nonregulated utilities funded by DOE are required to consider the time-of-day rates standard.

Exhibit 2.g

STATUS OF CONSIDERATION PROCESS FOR THE SEASONAL RATES STANDARD

Type of Utility	Status						Total
	Process Not Started	Process Started But No Determination Made	Determination Made to Implement Standard	Standard Put into Effect	Standard Rejected		
Regulated Electric	153	48	20	27	6	254	
Nonregulated Electric	55	4	0	2	1	62	
Total	208	52	20	29	7	316	

Exhibit 2.r

NONCOMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: SEASONAL RATES STANDARD\*

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation	4.4 Opportunity for intervenor compensation	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination	4.10	4.11 Determination made available to public
CA California PSC Anaheim Electric Division				6	1	6					
DC District of Columbia				1							
MI Lansing Board of Water & Light				1							
MN Minnesota DPS				3							
MO Independence Power & Light**	1	1	1	1	1	1		1	1	1	
NY New York				7							
NC No. Carolina				3		2					
PA Pennsylvania PUC						3	2				
SC So. Carolina PSC				2		2					
SD So. Dakota PUC				1							
TX Texas PUC				8							
VT Vermont PSC				1							
<b>TOTAL</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>35</b>	<b>1</b>	<b>14</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>	

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

\*\* Instituted seasonal rates policy in 1963.

Exhibit 2.s

CUSTOMERS COVERED BY THE SEASONAL RATES STANDARD

Type of Utility	Customer Group	Customers Covered Nationwide (000)	Customers Covered as a Percentage of All Customers	Customers Covered as a Percentage of Customers Served by Utilities Which Had Put the Standard into Effect
Regulated Electric	Residential	10,818.7	17.4	98.4
	Commercial & Industrial	1,108.9	12.2	78.3
	Other	5.5	1.1	23.0
Nonregulated Electric	Residential	43.2	0.8	40.9
	Commercial & Industrial	0.5	0.1	4.0
	Other	0.2	0.3	95.2
Total	Residential	10,861.9	16.2	97.8
	Commercial & Industrial	1,109.4	11.4	77.7
	Other	5.7	1.0	23.6

Exhibit 2.t

METHODS SELECTED TO MONITOR EFFECTS OF IMPLEMENTING THE SEASONAL RATES STANDARD

Type of Utility	Monitoring Methods*				
	Consumer Questionnaire	Follow-up Public Hearings	Changes in System Characteristics	Revenue Levels	Other
Regulated Electric	0.0	20.8	47.9	37.5	18.8
Nonregulated Electric	0.0	50.0	100.0	100.0	0.0

\* Percentage of utilities for which a determination to implement the standard had been made.

utility's current and future seasonal demands (which partially define the utility's need for new generating capacity). However, there had been no determination to implement the cost-of-service standard for 14 of the 49 utilities for which a determination to implement the seasonal rates standard had been made. Seasonal rates should reflect seasonal differences in a utility's cost of service. If a utility has not identified these differences by performing adequate cost-of-service studies, the seasonal rates offered to customers may not be cost-based and thus may not promote the purposes of PURPA.

#### 2.4.5 Status of Consideration Process: Interruptible Rates Standard

Consideration of the interruptible rates standard has been progressing slowly. Specifically, consideration of the standard had not even begun for 213 of the 316 electric utilities (see Exhibit 2.u). The standard had been put into effect by only 17 of the 254 regulated utilities and by none of the 62 nonregulated utilities covered by PURPA. One nonregulated utility (Anaheim Electric Division) had considered and rejected the standard. Analysis of the characteristics of the interruptible rates standards for which a determination to implement was made for 32 utilities (delineated in Exhibit 2.v) indicates that criteria for initiating interruption were not specified for 11 of the 32. Those state regulatory authorities and nonregulated utilities that had made a determination on the standard but reported not fully complying with the PURPA procedural requirements are identified in Exhibit 2.w.

No determination to implement the cost-of-service standard had been made for 4 of the 32 utilities for which a determination to implement the interruptible rates standard had been made. Since the cost-of-service standard had not been carried out for these utilities, the rates offered may not reflect the actual cost of providing interruptible service to the customer classes involved.

Just over 3 million customers were reported to be covered by the utilities that had put the interruptible rates standard into effect (see Exhibit 2.x). However, the number of customers actually covered (i.e., billed) under interruptible rates was probably much lower, because some of these were covered under voluntary schedules, i.e., the customers could choose whether to be billed under this rate or not. Therefore, 3 million should be considered an upper limit on the number of customers covered.

In addition, although interruptible rates are generally associated with commercial and industrial customers, only about 7 percent of the 3.2 million customers covered by the standard are commercial and industrial customers; the remaining 93 percent are residential.

Exhibit 2.u

STATUS OF CONSIDERATION PROCESS FOR THE INTERRUPTIBLE RATES STANDARD

Type of Utility	Status					Total
	Process Not Started	Process Started But No Determination Made	Determination Made to Implement Standard	Standard Put into Effect	Standard Rejected	
Regulated Electric	158	64	15	17	0	254
Nonregulated Electric	55	6	0	0	1	62
<b>Total</b>	<b>213</b>	<b>70</b>	<b>15</b>	<b>17</b>	<b>1</b>	<b>316</b>

Exhibit 2.v

CHARACTERISTICS OF INTERRUPTIBLE RATES STANDARDS\*

Schedule 6, Question 11: Does your interruptible rates standard require the following:

		11.1 Criteria for initiating interruption which take into account the following:			
State	Utility (type)	Status	11.11 System peak exceeding critical level	11.12 Reserve margin falling below predetermined level	11.13 Peaking energy which is constrained
CA	Generic (6 REI)		N	N	N
CO	Generic (2 REI, 1 REP)		Y	N	N
MN	Northern States Power (REI)		N	N	N
	Otter Tail Power Co. (REI)		Y	N	Y
	Minnesota P&L (REI)		Y	N	N
NC	Generic (3 REI)		Y	Y	Y
OH	Cleveland Elec. Illuminating (REI)		N	N	N
	Columbus & So. Ohio Electric (REI)		N	N	N
	Ohio Power Co. (REI)		N	N	N
PA	Duquesne Light Co. (REI)		Y	N	Y
	Metropolitan Edison (REI)		Y	Y	Y
	Pennsylvania Electric (REI)		Y	N	Y
	Pennsylvania Power (REI)		N	Y	N
	Philadelphia Elec. (REI)		N	Y	N
	UGI-Luzerne Elec. Div. (REI)		Y	N	Y
	West Penn. Power (REI)		Y	N	Y
SC	Duke Power Co. (REI)		Y	N	N
	South Carolina E&G (REI)		Y	N	N
UT	Utah Power & Light (REI)		N	N	N
WI	Madison Gas & Electric (REI)		Y	Y	N
	Northern States Power (REI)		Y	Y	N
	Wisconsin Electric Power (REI)		Y	Y	N
	Wisconsin Power & Light (REI)		Y	Y	N
<b>TOTAL 32 Utilities</b>		<b>Yes:</b>	<b>19</b>	<b>10</b>	<b>9</b>
		<b>No:</b>	<b>13</b>	<b>22</b>	<b>23</b>

REI: Regulated electric, investor-owned  
 REP: Regulated electric, publicly owned  
 REC: Regulated electric, cooperative

NEI: Nonregulated electric, investor-owned  
 NEP: Nonregulated electric, publicly owned  
 NEC: Nonregulated electric, cooperative

\* Includes standards that utilities have put into effect and standards for which a determination to implement has been made by the state regulatory authority or nonregulated utility.

Exhibit 2.w

NONCOMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: INTERRUPTIBLE RATES STANDARD\*

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation	4.4 Opportunity for intervenor compensation	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination	4.10	4.11 Determination made available to public
CA California PSC Anaheim Electric Division				6 1		6					
MN Minnesota DPS				2							
NC No. Carolina				3		3					
PA Pennsylvania PUC						7					
SC So. Carolina PSC	2	2	2	2	2	2		2			
UT Utah PSC	1	1	1	1	1			1	1	1	
TOTAL	3	3	3	15	3	18	0	3	1	1	

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

Exhibit 2.x

CUSTOMERS COVERED BY THE INTERRUPTIBLE RATES STANDARD

Type of Utility	Customer Group	Customers Covered Nationwide (000)	Customers Covered as a Percentage of All Customers	Customers Covered as a Percentage of Customers Served by Utilities Which Had Put the Standard into Effect
Regulated Electric	Residential	3,011.1	4.8	51.3
	Commercial & Industrial	219.7	2.4	31.8
	Other	5.7	1.1	57.6
Nonregulated Electric	Residential	0.0	0.0	0.0
	Commercial & Industrial	0.0	0.0	0.0
	Other	0.0	0.0	0.0
Total	Residential	3,011.0	4.5	51.3
	Commercial & Industrial	219.7	2.2	31.8
	Other	5.7	1.0	57.6

In general, the variable loads and electricity usage patterns and the geographical dispersion of residential customers make utility-controlled interruption of service quite expensive and cost-ineffective. However, the automatic interruption of some residential load can often be accomplished in a cost-effective manner. For example, most interruptible rates applicable to residential customers are rate schedules applicable to specific customer end-uses such as water heating and storage space heating systems.

2.4.6 Status of Consideration Process:  
Load Management Techniques Standard

The load management techniques standard had been put into effect by only 8 of the 254 regulated utilities and 2 of the 62 nonregulated utilities (see Exhibit 2.y). The techniques used by these utilities have generally been low-cost, low-technology approaches, such as providing information to customers, promoting the use of insulation in buildings, or introducing load control rates. Limited progress has been made on capital-intensive, more technical, data-intensive approaches, especially those involving direct utility control of customer loads, although these techniques offer significant potential for achieving the efficiency and conservation purposes of PURPA.

The consideration process had not been started for 166 of the 254 regulated utilities and 55 of the 62 nonregulated utilities. The process had been started but no determination had been made for another 53 regulated and 5 nonregulated utilities. No utilities had considered and rejected the standard. The characteristics of load management techniques standards implemented (delineated in Exhibit 2.z) show that the most widely used load management techniques are time switches and appliance load limiters. Energy storage systems are the least prevalent. All of the utilities covered by the standard had put into effect or were expected to put into effect some form of load management rates. Those state regulatory authorities and nonregulated utilities that had made a determination on the standard but reported not fully complying with the PURPA procedural requirements are identified in Exhibit 2.aa.

As of June 30, 1979, the standard had been put into effect for less than 4 percent of regulated utilities' customers (see Exhibit 2.bb).

A determination to implement the standard had been made for only 4 utilities\* for which no determination to implement the cost-of-service

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\* Otter Tail Power Company in Minnesota, Cleveland Electric Illuminating Company and Ohio Power Company, and West Pennsylvania Power (all regulated utilities).

Exhibit 2.y

STATUS OF CONSIDERATION PROCESS FOR THE LOAD MANAGEMENT TECHNIQUES STANDARD

Type of Utility	Status					Total
	Process Not Started	Process Started But No Determination Made	Determination Made to Implement Standard	Standard Put into Effect	Standard Rejected	
Regulated Electric	166	53	27	8	0	254
Nonregulated Electric	55	5	0	2	0	62
Total	221	58	27	10	0	316

Exhibit 2.z

CHARACTERISTICS OF LOAD MANAGEMENT TECHNIQUES STANDARD\*

Schedule 7, Question 11: Does your load management techniques standard require the following:

State Utility (type)	11.1 The utility to offer any of the following:					11.2 The utility to offer such load management devices as are shown to:			11.3 Load management rates:			
	11.11 Time switches	11.12 Load limiters to control the maximum electric demand of an appliance	11.13 Utility load controlled devices for customer appliances	11.14 Energy storage systems with solar	11.15 Energy storage systems without solar	11.21 Reduce maximum kilowatt-hour demand on utility	11.22 Provide long-run cost savings which will exceed the long-run costs of implementation	11.31 Load control rates for utility controlled devices	11.32 Load control rates without utility control	11.33 Rates with separate demand charge	11.34 Solar rates for customers with storage	
CA	Generic (6 REI)	Y	Y	Y	N	N	Y	Y	N	Y	N	
	Anaheim Electric Division (NEP)	Y	N	N	N	N	N	N	Y	N	N	
CO	Generic (2 REI, 1 REP)	N	N	N	N	N	N	Y	N	N	Y	
MI	Lansing Board of W&L (NEP)	Y	N	N	Y	N	Y	N	Y	N	N	
MN	Otter Tail Power Co. (REI)	Y	N	N	N	Y	Y	Y	N	N	N	
NC	Generic (3 REI)	N	N	Y	N	N	N	Y	Y	N	Y	
OH	Cincinnati Gas & Electric (REI)	N	N	N	N	N	N	N	Y	Y	N	
	Cleveland Elec. Illuminating (REI)	N	N	N	N	N	N	N	Y	Y	N	
	Columbus & So. Ohio Electric (REI)	N	N	Y	N	N	N	N	Y	Y	N	
	Dayton P&L (REI)	N	N	N	N	N	N	N	Y	Y	N	
	Monongahela Power (REI)	N	N	N	N	N	N	N	Y	Y	N	
	Ohio Edison (REI)	N	N	N	N	N	N	N	Y	Y	N	
	Ohio Power Co. (REI)	N	N	N	N	N	N	N	Y	Y	N	
	Toledo Edison Co. (REI)	N	N	N	N	N	N	N	Y	Y	N	
PA	Duquesne Light Co. (REI)	N	N	N	N	N	N	N	Y	Y	N	
	Metropolitan Edison (REI)	Y	Y	Y	N	N	Y	Y	Y	Y	N	
	Pennsylvania Electric (REI)	N	N	N	N	N	Y	Y	N	Y	N	
	Pennsylvania Power (REI)	Y	Y	Y	N	N	Y	Y	Y	Y	N	
	Philadelphia Elec. (REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
	UKF-Luzerne Elec. Div. (REI)	Y	Y	Y	N	N	Y	Y	Y	Y	N	
	West Penn. Power (REI)	N	N	N	N	N	N	N	Y	Y	N	
UT	Utah Power & Light (REI)	Y	Y	Y	N	N	Y	N	Y	N	N	
WI	Generic (5 REI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
	Wisconsin Electric Power (REI)	N	N	Y	Y	Y	Y	Y	Y	Y	Y	
TOTAL	37 Utilities	YES: 19	16	14	8	8	14	19	24	26	27	13
		NO: 18	21	23	29	29	23	18	13	11	10	24

REI: Regulated electric, investor-owned  
 REP: Regulated electric, publicly owned  
 REC: Regulated electric, cooperative

NEI: Nonregulated electric, investor-owned  
 NEP: Nonregulated electric, publicly owned  
 NEC: Nonregulated electric, cooperative

\* Includes standards that utilities have put into effect and standards for which a determination to implement has been made by the state regulatory authority or nonregulated utility.

NONCOMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: LOAD MANAGEMENT TECHNIQUES STANDARD\*

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation	4.4 Opportunity for intervenor compensation	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination	4.10	4.11 Determination made available to public
CA California PSC Anaheim Electric Division				6 1		6					
MI Lansing Board of Water & Light				1							
MN Minnesota				1							
NC No. Carolina				3		3					
PA Pennsylvania PUC						7					
TOTAL	0	0	0	12	0	16	0	0	0	0	0

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

Exhibit 2.bb

CUSTOMERS COVERED BY THE LOAD MANAGEMENT TECHNIQUES STANDARD

Type of Utility	Customer Group	Customers Covered Nationwide (000)	Customers Covered as a Percentage of All Customers	Customers Covered as a Percentage of Customers Served by Utilities Which Had Put the Standard into Effect
Regulated Electric	Residential	2,085.0	3.4	68.1
	Commercial & Industrial	348.8	3.8	100.0
	Other	0.3	0.1	9.1
Nonregulated Electric	Residential	7.3	0.1	5.4
	Commercial & Industrial	3.0	0.5	16.6
	Other	0.04	0.05	7.8
Total	Residential	2,092.3	3.1	65.5
	Commercial & Industrial	351.8	3.6	95.9
	Other	0.34	0.1	8.9

standard had been made. Only 10 of the 35 regulated utilities and 1 of the 2 nonregulated utilities for which a determination to implement the standard had been made performed the required cost/benefit analysis (see Exhibit 2.cc). Specifically, in most cases where a determination to implement load management techniques had been made, the resulting cost-displacement and implementation costs for the utility had not been systematically determined. In fact, since most of the techniques put into effect are indirect rather than direct, their likely effects may not even have been estimated. Unless cost displacement is accurately determined and reflected in rates, load management techniques will not achieve maximum market penetration (i.e., customer coverage) nor significantly contribute to the purposes of PURPA.

## 2.5 CONCLUSIONS

The fundamental importance of the cost-of-service standard to the achievement of the purposes of PURPA, and its relationship to the other five ratemaking standards, raises two central concerns. First, DOE is concerned that many, if not most, of the state regulatory authorities and nonregulated utilities may find it difficult to consider properly and to make a determination regarding the cost-of-service standard by the deadline established by PURPA (November 1981). Prescribing effective, detailed costing methodologies and developing the data required to apply these methodologies by the deadline will certainly be impractical in some cases. Furthermore, based on a review of the PURPA reports submitted by the state regulatory authorities and nonregulated utilities that have made a determination to implement the standard, DOE has concluded that the consideration process may not have been as in-depth as possible in some cases. DOE's second concern is that failure to consider adequately and to make a determination regarding the cost-of-service standard will adversely affect both the quality and timing of the state regulatory authorities and nonregulated utilities' consideration of the other five ratemaking standards.

The possibility that many state regulatory authorities and nonregulated utilities may be able to consider the cost-of-service standard adequately within the time frame established by PURPA seems even less likely when DOE considers that the consideration process for this standard had not even been started for 60 percent of the regulated and 87 percent of the nonregulated utilities. Of those few state regulatory authorities and nonregulated utilities that had made determinations to implement the standard, most had done so prior to the enactment of PURPA, November 9, 1978. Virtually all these state

**Exhibit 2.cc**  
**ELECTRIC UTILITIES FOR WHICH THE COSTS AND**  
**BENEFITS OF IMPLEMENTING THE LOAD MANAGEMENT**  
**TECHNIQUES STANDARD HAD BEEN DETERMINED**

Type of Utility	Costs and Benefits Determined	
Regulated Electric	Yes	28.6%*
	No	71.4%
Nonregulated Electric	Yes	50.0%
	No	50.0%

\* Percentage of utilities for which a determination to implement the standard had been made.

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regulatory authorities and nonregulated utilities reported they had met PURPA requirements related to prescribing recommended costing methodologies and identifying specific types of costs. However, information submitted on Form ERA-166 alone is not sufficient for DOE to fully assess the quality of their consideration process.

Without the necessary load research data and prescribed costing methodologies used in or resulting from a state regulatory authority's or nonregulated utility's consideration of or determination made to implement the cost-of-service standard, the state regulatory authorities and nonregulated utilities will be unable to evaluate the other ratemaking standards properly. Not only will this time lag hamper the state regulatory authorities' and nonregulated utilities' ability to meet the PURPA deadlines for these standards, but it may compel the state regulatory authorities and nonregulated utilities to expedite their consideration processes by reaching decisions that are not based on thorough, detailed determinations of underlying costs and benefits. DOE's review of the state regulatory authorities' and nonregulated utilities' reports justifies this concern: some state regulatory authorities and nonregulated utilities have considered the other ratemaking standards before considering the cost-of-service standard. Specifically, 21 percent of the determinations to implement another ratemaking standard besides cost-of-service have been reached without completion of the consideration process for the cost-of-service standard. Because consideration of the cost-of-service standard has not yet been completed in these cases, DOE is concerned about the adequacy of the consideration of these other ratemaking standards.

# 3

## PROGRESS ON PURPA REGULATORY STANDARDS

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Section 113(b) of PURPA establishes five regulatory standards that state regulatory authorities and nonregulated electric utilities must consider and make a determination whether or not to adopt by November 1980. These standards deal with: (1) master metering; (2) automatic adjustment clauses; (3) information to consumers; (4) termination of service; and (5) advertising. Section 303(b) establishes two of these standards -- termination of service and advertising -- for natural gas utilities as well.

In this chapter, we:

- 3.1 Describe the five regulatory standards
- 3.2 Describe how the regulatory standards differ from the ratemaking standards in terms of interrelationships and discuss implications for the consideration process
- 3.3 Provide an overview of nationwide progress in considering and determining to adopt the regulatory standards (including their status, characteristics of the standards adopted, compliance with PURPA procedural requirements, number of customers covered, and monitoring methods)
- 3.4 Discuss in detail the status of the consideration process for each standard
- 3.5 Present overall conclusions.

### 3.1 DESCRIPTION OF STANDARDS

In this section, we describe the principal features of the five regulatory standards, as delineated in Sections 113(b) and 115 of PURPA.

#### 3.1.1 Description: Master Metering

Section 113(b) of PURPA establishes a regulatory standard prohibiting or restricting the use of master metering (i.e., using a single meter to record electricity consumption in more than one dwelling unit)

in new buildings unless certain provisions of Section 115(d) are met. This prohibition is based on the concern that master metering provides occupants of multi-unit buildings incorrect price signals (or no price signals at all) regarding the variation of electricity costs with changes in electricity consumption. That is, because the monthly bills do not reflect the cost of providing the electricity used by each consumer, master metering of consumers living in master-metered dwelling units negates any real (i.e., economic) incentive to reduce consumption.

Master metering can result in inefficient uses of electricity by failing to assign costs to the customers who are actually creating them; in effect, low-usage customers subsidize high-usage customers. Thus, master metering may not promote the PURPA purposes of conservation of resources and equity in ratemaking.

There are, however, some situations where master metering may be cost-effective. For example, in an apartment building where electric lighting accounts for the main load, master metering minimizes overall billing and metering costs. Although accurate price signals are not directed to the consumer, prohibition of master metering in this case could result in total costs exceeding total benefits. Therefore, the standard has been defined to provide for exceptions or exemptions in cases where the costs of implementing the standard exceed the benefits.

### 3.1.2 Description: Automatic Adjustment Clauses Standard

Section 113(b)(2) of PURPA establishes a regulatory standard regarding automatic adjustment clauses. As defined in Section 115(e), an electric utility's automatic adjustment clause is a provision in its rate schedules that allows the utility to adjust its rates automatically (i.e., without prior hearing by the state regulatory authority) to recover increases or decreases (or both) in variable costs incurred by the utility. According to Section 115(e), an automatic adjustment clause meets the requirements of this standard if the responsible state regulatory authority or nonregulated utility determines in public, evidentiary hearings at least every 4 years that the clause provides a utility incentives to use resources efficiently. Furthermore, the state regulatory authority or nonregulated utility must review the clause at least every 2 years to ensure that the utility is making every effort to minimize the operating costs that are being recovered.

The most widely used type of automatic adjustment clause is a special rate schedule provision to account for fluctuations in a utility's major energy-related cost of service (i.e., fuel and purchased-power expenses).

This type of clause -- commonly called a fuel adjustment clause -- became widespread in 1973 when the oil embargo sent prices soaring. The increase in fuel prices was so rapid and dramatic that utilities with a large percentage of oil units in their generation mix unexpectedly encountered serious cash flow difficulties because their base rates recovered only a fraction of their total fuel costs. To alleviate these cash flow problems, many state regulatory authorities allowed utilities to put fuel adjustment clauses into effect.

### 3.1.3 Description: Information To Consumers Standard

Section 113(b)(3) of PURPA establishes a regulatory standard requiring that information on rate schedules be provided to consumers. The utilities for which the standard is adopted are to provide two types of information to each customer: (1) an explanation of existing and proposed rate schedules applicable to that customer, and (2) a summary of the rate schedules applicable to all major customer groups. The information provided must be clear and concise. The explanation of rates must be provided within 60 days after a customer begins to receive service or within 90 days after the state regulatory authority or nonregulated utility adopts this standard, and a summary statement must then be distributed annually. A consumer must also receive notice of any pending or proposed rate changes within 30 days of application by the utility (60 days if the utility uses a bimonthly billing system).

Under Section 115(f) of PURPA, utilities are also required to respond to consumer-initiated requests for information about electricity consumption in the previous year. They must provide the customer with a clear and concise statement of actual consumption or degree-day adjusted consumption, unless such consumption data are not reasonably ascertainable by the utility.

Electric rate schedules are often confusing and thus prevent a utility's customers from using electricity in ways that promote efficient use of the utility's resources. By providing customers with understandable information on services and rates, and thereby enabling them to make informed decisions on electricity consumption, this standard will promote the PURPA purposes of efficiency and conservation. By providing customers with actual consumption information, the utility will enable customers to evaluate the effectiveness of conservation measures on electricity use.

#### 3.1.4 Description: Termination of Service Standard

Sections 113(b)(4) and 303(b)(1) of PURPA establish a standard outlining procedures for terminating service to electric and gas consumers, respectively, and specifying the circumstances under which service cannot be terminated. The purpose of this standard is to safeguard consumer rights and to protect the elderly and handicapped. Thus, this standard contributes significantly to the equity objective of PURPA.

Sections 115(g) and 304(a) of PURPA also define the requirements that utilities putting this standard into effect must consider before terminating service. Basically, they must provide the consumer with reasonable notice and an opportunity to dispute the termination. During the time period when termination of service would be especially dangerous to health (as determined by the state regulatory authority or nonregulated utility), a utility may not terminate service to an individual who is unable to meet the utility's billing requirements or who is able to pay, but only in installments.

#### 3.1.5 Description: Advertising Standard

Sections 113(b)(5) and 303(b)(2) of PURPA define a regulatory standard prohibiting an electric or gas utility from recovering expenditures for political and promotional advertising from anyone other than the shareholders or other owners. Specifically, the shareholders (or owners) of the utility -- not the customers -- are to pay the costs of political or promotional advertising. Other types of public communications, such as informational/explanatory material or employment notices, are not subject to advertising restrictions.

Sections 115(h) and 304(b) of PURPA distinguish between political and promotional advertising. Political advertising is defined as advertising that attempts to influence public opinion on controversial issues of public importance. Promotional advertising is defined as advertising that involves use of the media to encourage an individual to use a service or equipment provided by the utility.

### 3.2 INTERRELATIONSHIPS AMONG STANDARDS AND IMPLICATIONS FOR THE CONSIDERATION PROCESS

Unlike the six ratemaking standards, the five regulatory standards are not connected by any strong interrelationship. Consequently, proper consideration of a particular regulatory standard can generally be accomplished without prior or concurrent consideration of any

other standard. The regulatory standards promote the three PURPA purposes, but in a less measurable (i.e., quantifiable) manner than the ratemaking standards. Furthermore, there are significant differences in the focus of certain regulatory standards on particular PURPA purposes.

Specifically, the master metering and automatic adjustment clauses standards promote efficiency by providing customers with cost-based price signals. The quantitative impacts on equity and conservation are harder to measure. In contrast, the standards on information to consumers and advertising clearly focus on promoting equity. In these cases, the quantitative impacts on conservation and efficient use of a utility's plant and equipment are harder to measure. The three PURPA purposes are explicitly excluded from the consideration process for the termination of service standard.

Two additional differences between the regulatory and ratemaking standards are important. First, although there is a great deal of controversy about whether each of the ratemaking standards should be implemented, it is generally accepted that several of the regulatory standards should be adopted. Specifically, participants in hearings to consider these standards rarely object in principle to providing adequate rate information to consumers, establishing guidelines for terminating electric or gas service, or preventing customers from paying for a utility's expenses for political or promotional advertising.

The second major difference is that fewer data and less complex analyses are required to consider three of the regulatory standards than are required to consider the ratemaking standards. For example, performing cost-of-service studies and designing cost-based rates require collection and analysis of significant quantities of load research and customer billing data. In contrast, the information to consumers, termination of service, and advertising standards can be considered properly using fewer data that may be collected relatively quickly and inexpensively. The automatic adjustment clauses and master metering standards are more closely comparable to the ratemaking standards in terms of their data and analytical requirements.

### 3.3. OVERVIEW OF NATIONWIDE PROGRESS

In view of the differences between the ratemaking and regulatory standards, it is reasonable to expect that consideration of the regulatory standards would be proceeding much more rapidly than

consideration of the ratemaking standards. However, DOE's examination of the Form ERA-166 reports filed by state regulatory authorities and nonregulated utilities indicates that consideration of the regulatory standards was not proceeding faster than consideration of the ratemaking standards. This is of particular concern in view of the 2-year time-limit on considering and making determinations on the PURPA ratemaking standards.

Determinations to adopt the termination of service and advertising standards had been made for 25-30 percent of the electric and gas utilities covered by PURPA; determinations to adopt the master metering, automatic adjustment clauses, and information to consumers standards had been made for just 11-16 percent of the electric utilities covered by PURPA (see Exhibit 3.a). More importantly, consideration of the termination of service and advertising standards had not begun for about 40 percent of covered utilities, and the consideration process for the master metering, automatic adjustment clauses, and information to consumers standards had not begun for about 60 percent.

In general, state regulatory authorities had made significantly more progress than nonregulated utilities. For each of the regulatory standards, the consideration process had been started or completed for at least 44 percent of the regulated utilities. On the other hand, for each of the regulatory standards, no more than 27 percent of the nonregulated utilities had started or completed the consideration process.

The state regulatory authorities and nonregulated utilities that had considered the regulatory standards reported reasonable compliance with the procedural requirements set forth in PURPA. The exceptions are the same as for the ratemaking standards; that is, many did not provide for intervenor funding, and many did not make a determination that adoption of the standard was appropriate to carry out the three PURPA purposes. Again, most of the state regulatory authorities and nonregulated utilities reporting determinations to adopt standards were reflecting actions taken prior to the enactment of PURPA. Nevertheless, they felt that the standards they had adopted substantially conformed with PURPA requirements.

#### 3.4 STATUS OF CONSIDERATION PROCESS

In the following sections, we describe the status of the consideration process (as of June 30, 1979) for each regulatory standard, as reported by the state regulatory authorities and nonregulated utilities.

Exhibit 3.a

STATUS OF CONSIDERATION PROCESS FOR FIVE REGULATORY STANDARDS

Regulatory Standard	Status					
	Process Not Started	Process Started But No Determination Made	Determination Made to Adopt Standard	Standard Put into Effect	Standard Rejected	Total
Master Metering	194	84	0	34	4	316
Automatic Adjustment Clauses	173	88	8	44	3	316
Information to Consumers	195	76	10	35	0	316
Termination of Service						
- Electric	141	101	12	62	-	316
- Gas	79	67	7	57	-	210
Advertising						
- Electric	135	86	15	79	1	316
- Gas	90	56	9	55	-	210

## REGULATORY STANDARDS

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### 3.4.1 Status of Consideration Process: Master Metering Standard

This standard had been put into effect by 27 regulated and 7 non-regulated utilities, or approximately 11 percent of the utilities covered by PURPA. The consideration process had been initiated for another 44 percent of the regulated and about 20 percent of the nonregulated utilities, and a determination had been made for 13 percent of the regulated and 10 percent of the nonregulated utilities (see Exhibit 3.b). The characteristics of the master metering standards for which determinations to adopt were reported (delineated in Exhibit 3.c) indicate that for almost all of the 34 utilities, the provisions of PURPA Sections 113(b) and 115(d) had been met in all but one area (i.e., the standards adopted for half the utilities did not require that the long-run benefits to electric consumers exceed the cost of purchasing and installing separate meters). Twenty-three of the 34 standards required that costs other than those of purchasing and installing separate meters be determined in deciding on the applicability of the standard. This requirement exceeds the provisions of PURPA.

Those state regulatory authorities and nonregulated utilities that reported not fully complying with PURPA procedural requirements are identified in Exhibit 3.d.

As a result of adoption of the standard by 27 regulated and 7 non-regulated utilities, almost 14 million customers nationally were covered by the master metering standard (see Exhibit 3.e). Although the prohibition established by PURPA applies to all classes of customers (residential, commercial, and industrial), coverage by the utilities was not uniform: more than 99 percent of residential customers of utilities for which the standard had been put into effect were covered, compared with less than half of the commercial and industrial customers. One explanation for this situation is the prevalent use of master metering in apartment buildings.

Only 7 of the 27 regulated utilities and none of the nonregulated utilities putting the standard into effect had performed a cost/benefit analysis, as specified in Section 115(d)(3) of PURPA; while none of the regulated utilities for which the standard had been rejected had performed the cost/benefit analysis (see Exhibit 3.f). All the state regulatory authorities and nonregulated utilities adopting the standard planned to undertake some form of monitoring, but there does not appear to be a consistent pattern or approach in their plans (see Exhibit 3.g). For example, a primary monitoring method selected by nonregulated utilities is conducting follow-up public hearings. However, state regulatory authorities selected this method for only about 15 percent of the utilities for which they had

Exhibit 3.b

STATUS OF CONSIDERATION PROCESS FOR THE MASTER METERING STANDARD

Type of Utility	Status					Total
	Process Not Started	Process Started But No Determination Made	Determination Made to Adopt Standard	Standard Put into Effect	Standard Rejected	
Regulated Electric	139	77	0	27	4	247
Nonregulated Electric	55	7	0	7	0	69
<b>Total</b>	<b>194</b>	<b>84</b>	<b>0</b>	<b>34</b>	<b>4</b>	<b>316</b>

Exhibit 3.c

CHARACTERISTICS OF MASTER METERING STANDARDS\*

Schedule 0, Question 10: Does your master metering standard require the following:

State	Utility (type)	10.1 Restriction or prohibition of master metering for a new building whenever:			10.2 That costs other than those of purchasing and installing separate meters must be considered in determining applicability of standard:	10.3 Special exclusions for:			
		10.11 There is more than one unit in the building	10.12 The occupant of each unit has control over a portion of the electric energy used in such unit	10.13 The long-run benefits to the electric consumer in the building exceed the costs of purchasing and installing separate meters		10.31 Publicly-owned buildings	10.32 Residential buildings	10.33 Commercial buildings	
CA	Anaheim Electric Division (NEP)	Y	N	N	N	N	N	N	
	Los Angeles DW&P (NEP)	Y	Y	Y	Y	N	N	Y	
IA	Generic (7 REI)	Y	Y	Y	Y	N	N	N	
	Muscataine P&W (NEI)	Y	Y	Y	N	Y	N	Y	
LA	Central Louisiana Elec. (REI)	Y	Y	N	N	N	N	N	
	Louisiana P&L (REI)	Y	Y	N	N	N	N	N	
	Southwestern Electric Power (REI)	Y	Y	N	N	N	N	N	
	Gulf State Utilities (REI)	Y	Y	N	N	N	N	N	
	Southwest Louisiana EMC (NEC)	Y	Y	Y	Y	Y	N	Y	
MI	Consumers Power Co. (REI)	Y	Y	Y	Y	N	N	N	
	Detroit Edison Co. (REI)	Y	Y	Y	Y	N	N	N	
	Lansing Board of W&L (NEP)	Y	Y	Y	Y	N	N	Y	
MS	Singing River EPA (NEC)	Y	Y	Y	Y	N	N	N	
NY	Generic (7 REI)	Y	Y	N*	Y	N	N	N	
OR	Generic (4 REI)	Y	Y	N	N	N	N	Y	
PA	Duquesne Light Co. (REI)	Y	Y	Y	Y	N	N	Y	
	Metropolitan Edison (REI)	N	Y	Y	Y	N	N	Y	
	Pennsylvania Electric (REI)	N	Y	Y	Y	N	N	Y	
WA	Seattle City Light (NEP)	Y	Y	N	N	N	N	Y	
TOTAL	34 Utilities	YES:	32	33	17	23	2	0	12
		NO:	2	1	17	11	32	34	22

N: no REI: Regulated electric, investor-owned NEI: Nonregulated electric, investor-owned  
 Y: yes REP: Regulated electric, publicly owned NEP: Nonregulated electric, publicly owned  
 REC: Regulated electric, cooperative NEC: Nonregulated electric, cooperative

\*includes standards that utilities have put into effect and standards for which a determination to it has been made by the state regulatory authority or nonregulated utility.

Exhibit J.d

NONCOMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: MASTER METER(N); STANDARD

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation	4.4 Opportunity for intervenor compensation	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination 4.10	4.11 Determination made available to public
CA Anaheim Electric Division L.A. Dept. of Water & Power				1	1				1	
IA Iowa Commerce Commission Muscatine Power & Light	1	1	1	1	1			1		
LA Louisiana PSC SW Louisiana Electric	4	4	4	4	4	4		4		
MI Michigan Lansing Board of Water & Light				2	1					
MS Singing River Electric Power				1						
OR Oregon Public Util. Comm.	4	4	4	4	4			4	4	4
PA Pennsylvania PUC						2				
WA Seattle City Light Dept.				1		1				
WY Wyoming PSC				4						
NY New York				7						
<b>TOTAL</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>35</b>	<b>9</b>	<b>7</b>	<b>0</b>	<b>9</b>	<b>5</b>	<b>4</b>

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

Exhibit 3.e

CUSTOMERS COVERED BY THE MASTER METERING STANDARD

Type of Utility	Customer Group	Customers Covered Nationwide (000)	Customers Covered as a Percentage of All Customers	Customers Covered as a Percentage of Customers Served by Utilities Which Had Put the Standard into Effect
Regulated Electric	Residential	11,757.3	19.1	100.0
	Commercial & Industrial	499.3	5.5	35.3
	Other	8.0	1.7	20.0
Nonregulated Electric	Residential	1,412.9	25.2	95.6
	Commercial & Industrial	173.8	25.5	84.3
	Other	5.7	6.1	63.3
Total	Residential	13,170.2	19.6	99.5
	Commercial & Industrial	673.1	6.9	41.5
	Other	13.7	2.4	28.1

Exhibit 3.f  
ELECTRIC UTILITIES FOR WHICH THE COSTS  
AND BENEFITS OF PUTTING INTO EFFECT THE  
MASTER METERING STANDARD HAD BEEN DETERMINED

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Type of Utility	Costs and Benefits Determined
Regulated Electric	Yes - 22.6%*
	No - 77.4%
Nonregulated Electric	Yes - 0.0%
	No - 100.0%

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\* Percentage of utilities for which a determination to adopt the standard had been made.

Exhibit 3.g

METHODS SELECTED TO MONITOR EFFECTS OF PUTTING THE MASTER METERING STANDARD INTO EFFECT

Type of Utility	Monitoring Methods*				
	Consumer Questionnaire	Follow-up Public Hearings	Changes in System Characteristics	Revenue Levels	Other
Regulated Electric	0.0	14.8	48.1	40.7	40.7
Nonregulated Electric	14.3	42.9	28.6	42.9	28.6

\* Percentage of utilities for which a determination to adopt the standard had been made.

adopted the standard; the primary monitoring methods being used for these utilities were examination of the standard's impacts on utility system characteristics and customer group revenue levels. Although monitoring methods were noted, no utility identified assessment criteria for measuring their impacts.

More state regulatory authorities and nonregulated utilities than the number reporting adoption of this standard may actually have been in partial compliance with the purposes of PURPA. PURPA prohibits or restricts the use of master metering in all new buildings -- residential, commercial, and industrial -- under certain conditions. Through legislation or regulation, several states have already applied such a prohibition or restriction to multi-unit residential dwellings. This action has preempted state regulatory authorities or nonregulated utilities from considering the standard and reporting such consideration. No information was reported regarding the states' activities resulting in the legislation or regulation; therefore, no assessment can be made regarding the procedures followed. At least some of these procedures may conform to PURPA requirements.

#### 3.4.2 Status of Consideration Process: Automatic Adjustment Clauses Standard

Despite the fact that many utilities have used automatic adjustment clauses at one time or another since 1973, formal consideration of this standard has been slow. State regulatory authorities and nonregulated utilities had not yet made a determination on the standard for more than 80 percent of the utilities, i.e., 261 of the 316 utilities covered by PURPA (see Exhibit 3.h). The standard had been put in effect by only 39 regulated and 5 nonregulated utilities; and had been rejected for 3 regulated utilities. As with most of the other standards, nonregulated utilities had not progressed as far as state regulatory authorities in the consideration process. The reported characteristics of the automatic adjustment clauses standards adopted (delineated in Exhibit 3.i), show that, for about 60 percent of the utilities, the standard conforms with the PURPA requirement that evidentiary hearings be held every 2 years to ensure maximum economies in purchasing and operations. However, evidentiary hearings are to be held every 4 years on efficiency incentives for only about 40 percent of the utilities. Those state regulatory authorities and nonregulated utilities whose reports to DOE indicated that they had not fully complied with the PURPA procedural requirements are identified in Exhibit 3.j.

The automatic adjustment clauses standard had been put into effect for about 22 percent (16.7 million) of all utility customers, including almost 15 million residential customers (see Exhibit 3.k).

Exhibit 3.h

STATUS OF CONSIDERATION PROCESS FOR THE AUTOMATIC ADJUSTMENT CLAUSES STANDARD

Type of Utility	Status					Total
	Process Not Started	Process Started But No Determination Made	Determination Made to Adopt Standard	Standard Put into Effect	Standard Rejected	
Regulated Electric	116	81	8	39	3	247
Nonregulated Electric	57	7	0	5	0	69
Total	173	88	8	44	3	316

Exhibit 3.1

CHARACTERISTICS OF AUTOMATIC ADJUSTMENT CLAUSES STANDARDS\*

Schedule 9, Question 10: Does your automatic adjustment clauses standard require or permit the following:

State	Utility (type)	10.1 Provisions which permit automatic adjustments for the following types of costs:				10.2 A review process for automatic adjustment clauses which:				
		10.11 Oil	10.12 Natural gas	10.13 Purchased power	10.14 Power purchases during emergencies (e.g., oil embargo, coal strike)	10.21 Specifies full evidentiary hearings to be held not less often than every 2 years to insure maximum economies in operations and purchases which affect automatic adjustment clause rates	10.22 Specifies full evidentiary hearings to be held not less often than every 4 years on efficiency incentives for use of scarce fuels	10.23 Addresses general utility management practices	10.24 Addresses audit of automatic adjustment clause billings	
CA	Anaheim Electric Division (NEP) Los Angeles DW&P (NEP)	N Y	N Y	Y Y	N Y	N N	N Y	N Y	Y Y	
CO	Public Service Co. (REI)	N	N	N	Y	Y	Y	Y	Y	
CT	Generic (3 REI)	N	N	N	N	N	Y	Y	Y	
FL	City of Tallahassee (NEP)	Y	Y	Y	Y	N	N	N	N	
IA	Generic (7 REI)	Y	Y	Y	Y	Y	Y	Y	Y	
KY	Generic (4 REI, 2 REC)	Y	Y	Y	N	Y	N	Y	Y	
MI	Consumers Power Co. (REI) Detroit Edison Co. (REI)	Y Y	Y Y	Y Y	Y Y	Y Y	Y Y	N N	Y Y	
	Indiana & Mich. Elec. (REI)	Y	Y	Y	Y	Y	Y	N	Y	
MN	Generic (4 REI)	Y	Y	Y	Y	N	N	Y	N	
MS	Singing River EPA (NEC)	N	N	Y	Y	N	Y	Y	Y	
OH	Generic (8 REI) Cleveland Div. of L&P (NEP)	Y Y	Y Y	Y Y	Y Y	Y N	Y N	Y Y	Y Y	
PA	Generic (8 REI)	Y	Y	Y	Y	Y	N	N	Y	
SC	Carolina Power & Light (REI) Duke Power Co. (REI)	N N	N N	N N	N N	N N	N N	N N	N N	
	South Carolina E&G (REI)	N	N	N	N	N	N	N	N	
VT	Generic (3 REI) Central Vt. Public. Svc. (REI)	N N	N N	N N	N N	N N	N Y	N Y	N Y	
TOTAL	52 Utilities	YES: NO:	39 13	39 13	35 17	35 17	33 19	20 32	33 19	41 11

N: no REI: Regulated electric, investor-owned NEI: Nonregulated electric, investor-owned  
 Y: yes REP: Regulated electric, publicly owned NEP: Nonregulated electric, publicly owned  
 REC: Regulated electric, cooperative NEC: Nonregulated electric, cooperative

\* Includes standards that utilities have put into effect and standards for which a determination to adopt has been made by the state regulatory authority or nonregulated utility.

Exhibit 3.j

NON-COMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: AUTOMATIC ADJUSTMENT CLAUSES STANDARD\*

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation	4.4 Opportunity for intervenor compensation	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination	4.10	4.11 Determination made available to public
CA Anaheim Electric Division				1							
L.A. Dept. of Water & Power				1		1					
CT Connecticut	3			3		3					
FL City of Tallahassee	1	1	1	1	1	1		1			
IA Iowa Commerce Commission				1							
ME Maine PUC				3							
MI Michigan PSC				3							
MN Minnesota				4							
OH Ohio Cleveland Div. of Light & Power				8							
PA Pennsylvania PUC				1		1					
SC So. Carolina PSC				3							
UT Utah PSC	3	3	3	3	3	3		3	3	3	
VT Vermont PSC				1							
<b>TOTALS</b>	<b>7</b>	<b>4</b>	<b>4</b>	<b>33</b>	<b>4</b>	<b>20</b>	<b>0</b>	<b>4</b>	<b>3</b>	<b>3</b>	

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

Exhibit 3.k

CUSTOMERS COVERED BY THE AUTOMATIC ADJUSTMENT CLAUSES STANDARD

Type of Utility	Customer Group	Customers Covered Nationwide (000)	Customers Covered as a Percentage of All Customers	Customers Covered as a Percentage of Customers Served by Utilities Which Had Put the Standard into Effect
Regulated Electric	Residential	13,768.4	22.4	97.7
	Commercial & Industrial	1,537.7	17.0	96.2
	Other	45.1	9.4	91.3
Nonregulated Electric	Residential	1,189.8	21.2	100.0
	Commercial & Industrial	176.0	25.8	100.0
	Other	6.3	6.7	100.0
Total	Residential	14,958.2	22.3	97.8
	Commercial & Industrial	1,713.7	17.6	96.5
	Other	51.4	8.9	92.3

The standard covered almost 100 percent of the customers served by utilities that had put the standard into effect.

Under PURPA, state regulatory authorities and nonregulated utilities are required to conduct formal audits and hold periodic public hearings to review each automatic adjustment clause put into effect by a utility to ensure that the utility efficiently purchases and uses the resources whose costs are partially recovered through the clause. Consequently, public hearings and monitoring of revenue levels are the primary methods that state regulatory authorities and nonregulated utilities reported selecting to monitor the impacts of putting the standard into effect (see Exhibit 3.1).

#### 3.4.3 Status of Consideration Process: Information to Consumers Standard

This standard had been put into effect by 13 percent of regulated utilities and was being considered for another 28 percent (see Exhibit 3.m). The consideration process had not yet begun for over half the regulated utilities. Nonregulated utilities had made even less progress: 4 percent had put the standard in effect; 12 percent were considering it; and 83 percent had not yet started the process. The reported characteristics of the information to consumers standards adopted (delineated in Exhibit 3.n) show general conformance with PURPA requirements for transmittal of information following adoption of the standard, commencement of service to new consumers, and applications for rate changes. However, only mixed conformance was reported with requirements for annual transmittal of summaries of rate schedules applicable to all classes and for identification of classes whose rate schedules would not be included in the summaries. Provision of prior-year consumption data upon customer request was mandated for three-fourths of the utilities for which a determination had been made to adopt the standard. As shown in the exhibit, each of the 41 regulated electric utilities and 4 nonregulated electric utilities were required to transmit at least some information to consumers regarding rate schedules, and over three-fourths were required to transmit information regarding prior consumption upon consumer request. Specifically:

- Thirty-five regulated and two nonregulated utilities were required to transmit applicable information on existing rate schedules and on any rate schedule applied for within 60 days after consumer service starts.
- Each regulated utility and two of the nonregulated utilities were required to transmit applicable information on existing rate schedules and any rate schedule applied for within 30 to 60 days after application for rate changes.

Exhibit 3.1  
 METHODS SELECTED TO MONITOR IMPACTS OF PUTTING THE  
 AUTOMATIC ADJUSTMENT CLAUSES STANDARD INTO EFFECT

Type of Utility	Monitoring Methods*				
	Consumer Questionnaire	Follow-up Public Hearings	Changes in System Characteristics	Revenue Levels	Other
Regulated Electric	0.0	76.6	55.3	63.8	36.2
Nonregulated Electric	20.0	40.0	40.0	80.0	0.0

\* Percentage of utilities for which a determination to adopt the standard had been made.

Exhibit 3.m

STATUS OF CONSIDERATION PROCESS FOR THE INFORMATION TO CONSUMERS STANDARD

Regulatory Standard	Status						Total
	Process Not Started	Process Started But No Determination Made	Determination Made to Adopt Standard	Standard Put into Effect	Standard Rejected		
Regulated Electric	138	68	9	32	0	247	
Nonregulated Electric	57	8	1	3	0	69	
Total	195	76	10	35	0	316	

Exhibit 3.n

CHARACTERISTICS OF INFORMATION TO CONSUMERS STANDARDS\*

Schedule 10, Question 10: Does your information to consumers standard require the following:

State	Utility (type)	10.1 Transmittal of information to consumers of existing rate schedule and any rate schedule applied for:	10.11 Not later than 60 days after commencement of service to consumers or 90 days after standard adopted, whichever occurs last	10.12 Not later than 30 days (60 days in case of utility which uses a bimonthly billing system) after utility's application for any change in rate schedule applicable to consumers	10.2 Transmittal to consumers not less frequently than once each year of:	10.21 A summary of the existing rate schedules applicable to each of the major consumer classes for which there is a separate rate	10.22 Identification of any classes whose rates are not summarized	10.3 Transmittal to consumers, upon request, of statement of actual consumption (or degree-day adjusted consumption) for each billing period during the prior year (unless such consumption data is not reasonably ascertainable by the utility:	10.31 Statement to consumers
CA	Anahelm Electric Div. (NEP) L.A. DWAP (NEP)	Y	Y	Y	Y	Y	Y	N	Y
IA	Generic (7 REI)	Y	Y	Y	Y	N	N	Y	Y
LA	S.W. Louisiana EMC (NEC)	Y	Y	Y	Y	Y	Y	Y	Y
MN	Generic (4 REI)	Y	Y	Y	N	N	N	N	N
MS	Singing River EPA (NEC)	N	N	N	Y	Y	Y	Y	Y
NM	Generic (5 REI)	Y	Y	Y	Y	Y	Y	Y	Y
PA	Generic (8 REI)	Y	Y	Y	N	N	N	Y	Y
SD	Generic (6 REI)	Y	Y	Y	N	N	N	Y	Y
UT	Utah Power & Light (REI)	Y	Y	Y	Y	Y	Y	Y	Y
WI	Generic (6 REI)	N	Y	Y	Y	Y	Y	N	N
WY	Generic (4 REI)	Y	Y	Y	Y	Y	Y	Y	Y
45 Utilities		YES:	37	43	20	20	20	34	
		NO:	8	2	25	25	25	11	

N: no REI: Regulated electric, investor-owned NEI: Nonregulated electric, investor-owned  
 Y: yes REP: Regulated electric, publicly owned NEP: Nonregulated electric, publicly owned  
 REC: Regulated electric, cooperative NEC: Nonregulated electric, cooperative

\* Includes standards that utilities have put into effect and standards for which a determination to adopt has been made by the state regulatory authority or nonregulated utility.

- Sixteen regulated and all four nonregulated utilities were required to transmit yearly: (1) a summary of existing rate schedules applicable to each of the major customer classes for which there is a separate rate; and (2) identification of any classes whose rates are not included in the summary.
- Thirty-one regulated and three nonregulated utilities were required to transmit, upon request, a statement of consumption for each billing period during the prior year.

Those state regulatory authorities and nonregulated utilities whose reports to DOE indicated that they had not fully complied with the PURPA procedural requirements are identified in Exhibit 3.o.

This standard had been put into effect by 32 regulated and 3 nonregulated utilities (see Exhibit 3.p), and covered over 9 million customers (about 12 percent of all utility customers covered by PURPA). Standards that had been put into effect by regulated utilities did not always cover commercial and industrial customers, but did cover all residential customers, whereas nonregulated utilities that had put the standard into effect had applied it to all customer groups. This nonuniformity of customer coverage may reflect a tendency of state regulatory authorities to react fairly rapidly to regulatory pressures exerted by residential customers.

From information presented in Form ERA-166, it is difficult to discern a pattern for monitoring and follow-up plans. Each of the standard monitoring methods was planned for no more than 28 percent of the regulated utilities for which state regulatory authorities had made determinations to adopt the standard (see Exhibit 3.q). The only monitoring methods selected by nonregulated utilities were consumer questionnaires and follow-up public hearings. This general lack of aggressive monitoring may be indicative of the problems state regulatory authorities and nonregulated utilities perceive in developing quantitative estimates of the impacts associated with putting this standard into effect.

#### 3.4.4 Status of Consideration Process:

##### Termination of Service Standard

Generally, the state regulatory authorities had made more progress than the nonregulated utilities in the consideration process for the termination of service standard. The standard had been put into effect by 24 percent of the regulated utilities (both electric and gas), compared with 14 percent of the nonregulated utilities (see Exhibit 3.r). The consideration process had not begun for about 35 percent of regulated utilities, compared with about 70 percent of nonregulated utilities.

Exhibit 3.o

NONCOMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: INFORMATION TO CONSUMERS STANDARD\*

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation	4.4 Opportunity for intervenor compensation	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination	4.10	4.11 Determination made available to public
CA Anaheim Electric Division				1							
L.A. Dept. of Water & Power				1		1					
IA Iowa Commerce Commission				7		7					
LA SW Louisiana Electric	1	1	1	1	1			1			
MN Minnesota				4							
MS Singing River Electric Power				1							
NM New Mexico				5							
PA Pennsylvania PUC						8					
SD South Dakota				6							
UT Utah PSC	1	1	1	1	1	1		1	1	1	
WI Wisconsin PSC						6					
WY Wyoming PSC				4							
<b>Total</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>31</b>	<b>2</b>	<b>23</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>1</b>	

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

Exhibit 3.p

CUSTOMERS COVERED BY THE INFORMATION TO CONSUMERS STANDARD

Type of Utility	Customer Group	Customers Covered Nationwide (000)	Customers Covered as a Percentage of All Customers	Customers Covered as a Percentage of Customers Served by Utilities Which Had Put the Standard into Effect
Regulated Electric	Residential	7,334.9	11.9	100.0
	Commercial & Industrial	447.4	5.0	49.8
	Other	12.8	2.7	81.0
Nonregulated Electric	Residential	1,085.2	19.3	100.0
	Commercial & Industrial	156.8	23.0	100.0
	Other	5.3	5.7	100.0
Total	Residential	8,420.1	12.5	100.0
	Commercial & Industrial	604.2	6.2	57.2
	Other	18.1	3.1	85.8

Exhibit 3.q

METHODS SELECTED TO MONITOR IMPACTS OF PUTTING  
THE INFORMATION TO CUSTOMER STANDARD INTO EFFECT

Type of Utility	Monitoring Methods*				
	Consumer Questionnaire	Follow-up Public Hearings	Changes in System Characteristics	Revenue Levels	Other
Regulated Electric	0.0	27.9	11.6	25.6	48.8
Nonregulated Electric	25.0	50.0	0.0	0.0	0.0

\* Percentage of utilities for which a determination to adopt the standard had been made.

Exhibit 3.r

STATUS OF CONSIDERATION PROCESS FOR THE TERMINATION OF SERVICE STANDARD

Regulatory Standard	Status					Total
	Process Not Started	Process Started But No Determination Made	Determination Made to Adopt Standard	Standard Put into Effect	Standard Rejected	
Regulated						
- Electric	87	94	12	54	0	247
- Gas	74	65	5	54	0	198
Nonregulated						
- Electric	54	7	0	8	0	69
- Gas	5	2	2	3	0	12
Total	220	168	19	119	0	526

The reported characteristics of the termination of service standards adopted are delineated in Exhibit 3.s. All of the 138 covered utilities were required to give some form of prior notice of termination, including notice of rights and remedies for all but 5 utilities. However, only 80 utilities were required to have special procedures for notifying elderly and handicapped consumers. There was a requirement for 126 utilities to identify procedures and individuals for handling disputes. One hundred twenty-five utilities were required to have specifically-defined procedures that must be adhered to for considering possible dangers to consumer health before terminating service. However, only 89 of the 138 were required not to terminate service when a consumer health danger exists and the consumer is unable to pay in accordance with the requirements of the utility's bill. Those state regulatory authorities and nonregulated utilities that reported not fully complying with the PURPA procedural requirements are identified in Exhibit 3.t.

As a result of 108 regulated utilities and 11 nonregulated utilities putting this standard into effect, over 27 million customers were covered (see Exhibit 3.u). About 94 percent of these were residential customers.

Follow-up public hearings and monitoring of revenue level changes were the predominant methods chosen by state regulatory authorities and nonregulated electric utilities for monitoring the impacts of putting the standard into effect (see Exhibit 3.v). However, non-regulated gas utilities reported no monitoring plans.

#### 3.4.5 Status of Consideration Process: Advertising Standard

Progress by state regulatory authorities regarding the advertising standard was significantly more advanced than progress by nonregulated utilities. For example, the standard had been put into effect by 28 percent of the regulated and only 12 percent of the nonregulated utilities. The consideration process had been initiated but no determination had been made for 30 percent of the regulated and 10 percent of the nonregulated utilities. The process had not yet started for 36 percent of the regulated and 77 percent of the nonregulated utilities (see Exhibit 3.w).

The reported characteristics of the advertising standards adopted (delineated in Exhibit 3.x) indicate excellent conformance with all PURPA requirements. Specifically, 137 of the 158 utilities (80 electric and 57 gas) were prohibited from recovering political and promotional advertising expenses from ratepayers. Only two of those 137 were not required to recover these expenses from shareholders or other owners. Those state regulatory authorities and nonregulated utilities that reported not fully complying with the PURPA procedural requirements are identified in Exhibit 3.y.

CHARACTERISTICS OF TERMINATION OF SERVICE STANDARDS\*

Schedule 11, Question 10: Does your termination of service standard require the following:

State	Utility (type)	10.1	10.11	10.12	10.13	10.14	10.2	10.3	10.4	10.5	10.6	10.61	10.62	10.63	10.64
		Prior notice of termination with:	Two or more such notices to be issued	The last such notice to be issued 7 or more days prior to termination date	Notification to individual occupants of master metered building if service is to be shut off	Special procedures for notifying elderly and handicapped consumers	A notice of rights and remedies be provided to the consumer with all termination notices	Identification to customers of procedures and individuals for handling disputes	Providing repayment information to customers	That specifically-defined procedures for considering possible dangers to customer health be adhered to before service is terminated	Service not to be terminated when:	Consumer has not received notice (including notice of rights and remedies) at least 7 days prior to termination date	Consumer has not had at least 7 days to dispute the reasons for termination	Consumer health danger exists and consumer is unable to pay in accordance with requirements of utility's billing	Consumer health danger exists and consumer can only afford to pay in installments
CA	Anaheim Electric Div. (NEP)	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y
	L.A. DW&P (NEP)	N	Y	Y	N	Y	Y	Y	N	N	Y	Y	Y	N	Y
DC	Generic (1 REI, 1 RGI)	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
FL	Jacksonville Electric Auth. (NEP)	N	Y	Y	N	Y	Y	Y	Y	N	N	Y	Y	N	Y
IA	Generic (7 REI, 9 RGI)	Y	N	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
	Muscatine P&L (NEI)	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
KY	Generic (4 REI, 2 REC, 6 RGI)	N	Y	N	N	Y	N	N	N	Y	Y	Y	Y	Y	Y
LA	SW Louisiana EMC (NEP)	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
ME	Generic (3 REI)	N	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
MA	Generic (7 REI, 5 RGI)	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
MI	Lansing Board of W&L (NEP)	Y	N	N	N	N	Y	Y	Y	N	N	N	N	Y	Y
MS	Singing River EPA (NEC)	Y	N	N	Y	Y	Y	Y	N	Y	N	N	N	N	Y
NB	Iowa Public Service (NGI)	Y	N	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
	Kansas-Nebraska NG (NGI)	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
	Minnesota Gas Co. (NGI)	N	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
	Northwestern Public Service (NGI)	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
NH	Generic (1 REI, 1 RGI)	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
NM	Generic (5 REI, 1 RGI)	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

(continued next page)

N: no \*  
Y: yes

REI: Regulated electric, investor-owned  
REP: Regulated electric, publicly owned  
REC: Regulated electric, cooperative

NEI: Nonregulated electric, investor-owned  
NEP: Nonregulated electric, publicly owned  
NEC: Nonregulated electric, cooperative

\* Includes standards that utilities have put into effect and standards for which a determination to adopt has been made by the state regulatory authority or nonregulated utility.

Exhibit 3.9 (continued)

CHARACTERISTICS OF TERMINATION OF SERVICE STANDARDS\*

Schedule 11, Question 10: Does your termination of service standard require the following:

State	Utility (type)	10.1	10.11	10.12	10.13	10.14	10.2	10.3	10.4	10.5	10.6	10.61	10.62	10.63	10.64
NY	Generic (7 REI, 9 RGI)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N**	Y
OH	Cleveland, Div. of L&P (NEP)	N	Y	N	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
PA	Generic (8 REI, 11 RGI)	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	N	Y
SD	Generic (6 REI, 4 RGI)	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	N	N
UT	Generic (3 REI, 1 RGI)	N	N†	Y	N	N	N	Y	Y	Y	Y	N†	N	Y	Y
VT	Generic (2 REI)	N	Y	N	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
VA	City of Richmond, DPU (NGP)	N	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
WI	Generic (6 REI, 7 RGI)	N	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
WY	Generic (4 REI, 4 RGI)	Y	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
TOTAL 130 Utilities		YES:	96	78	73	80	133	126	124	125	112	132	89	128	
		NO:	42	60	65	58	5	12	14	13	26	6	49	10	

N: no  
Y: yes

REI: Regulated electric, investor-owned  
REP: Regulated electric, publicly owned  
REC: Regulated electric, cooperative

NEI: Nonregulated electric, investor-owned  
NEP: Nonregulated electric, publicly owned  
NEC: Nonregulated electric, cooperative

\* Includes standards that utilities have put into effect and standards for which a determination to adopt has been made by the state regulatory authority or nonregulated utility.

\*\* Referred to social service agencies.

† Five days.

Exhibit 3.t  
 NONCOMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: TERMINATION OF SERVICE STANDARD\*

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation **	4.4 Opportunity for intervenor compensation **	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination	4.10	4.11 Determination made available to public
CA Anaheim Electric Division L.A. Dept. of Water & Power					1						
DC District of Columbia						2					
FL Jacksonville Elec. Auth.						1					
IA Iowa Commerce Commission Muscatine Power & Light	1	1	1	1	1			1			
LA SW Louisiana Electric						1					
ME Maine PUC						3					
MA Mass. Dept. of Pub. Util.						7					
MI Lansing Board of Water & Light						1	1				
MS Singing River Electric						1					

(continued next page)

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

\*\* Applies only to electric utilities.

Exhibit 3.c (continued)

NONCOMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: TERMINATION OF SERVICE STANDARD\*

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation **	4.4 Opportunity for intervenor participation **	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination 4.10	4.11 Determination made available to public
NB NW Pub. Service	1	1			1	1		1	1	1
NH New Hampshire				2						
NY New York				7						
OH Cleveland Div. of Light & Power	1	1	1	1	1	1		1	1	1
PA Pennsylvania PUC						19				
SD So. Dakota PSC				6						
VT Vermont PSC				2		2				
VA City of Richmond	1	1			1	1		1	1	1
WI Wisconsin PSC						13				
WY Wyoming PSC				4						
TOTALS	4	4	2**	48**	4	38	0	4	3	3

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

\*\* Applies only to electric utilities.

CUSTOMERS COVERED BY THE TERMINATION OF SERVICE STANDARD

Type of Utility	Customer Group	Customers Covered Nationwide (000)	Customers Covered as a Percentage of All Customers	Customers Covered as a Percentage of Customers Served by Utilities Which Had Put the Standard Into Effect
Regulated				
- Electric	Residential	15,058.6	24.4	100.0
	Commercial & Industrial	1,059.2	11.7	56.8
	Other	40.8	8.5	89.3
- Gas	Residential	8,980.3	22.9	94.7
	Commercial & Industrial	408.7	12.8	60.7
	Other	8.0	16.0	94.1
Nonregulated				
- Electrical	Residential	1,462.6	26.1	100.0
	Commercial & Industrial	194.0	28.5	79.3
	Other	6.1	6.5	67.0
- Gas	Residential	93.1	11.0	100.0
	Commercial & Industrial	12.1	13.0	100.0
	Other	0.1	59.0	100.0

Exhibit 3.v

METHODS SELECTED TO MONITOR IMPACTS OF PUTTING  
THE TERMINATION OF SERVICE STANDARD INTO EFFECT

Type of Utility	Monitoring Methods*				
	Consumer Questionnaire	Follow-up Public Hearings	Changes in System Characteristics	Revenue Levels	Other
<b>Regulated</b>					
- Electric	2.0	35.0	22.0	33.0	50.0
- Gas	2.0	39.0	19.0	31.0	56.0
<b>Nonregulated</b>					
- Electric	12.5	37.5	25.0	50.0	0.0
- Gas	0.0	0.0	0.0	0.0	0.0

\* Percentage of utilities for which a determination to adopt the standard had been made.

Exhibit 3.w

STATUS OF CONSIDERATION PROCESS FOR THE ADVERTISING STANDARD

Regulatory Standard	Status					Total
	Process Not Started	Process Started But No Determination Made	Determination Made to Adopt Standard	Standard Put Into Effect	Standard Rejected	
Regulated						
- Electric	79	79	15	74	0	247
- Gas	84	55	9	50	0	198
Nonregulated						
- Electric	56	7	0	5	1	69
- Gas	6	1	0	5	0	12
<b>Total</b>	<b>225</b>	<b>142</b>	<b>24</b>	<b>134</b>	<b>1</b>	<b>526</b>

CHARACTERISTICS OF ADVERTISING STANDARDS\*

Schedule 12, Question 10: Does your advertising standard require the following:

State	Utility (type)	10.1 Definitions of political and promotional advertising which conform with those given in PURPA sec. 115(h) or 304(b)	10.2 Prohibitions on the recovery of political and promotional advertising expenses from ratepayers	10.3 Requirements that political and promotional advertising expenses be recovered from shareholders or other owners
CA	Generic (6 REI, 5 RGI)	Y	Y	Y
	Anahelm Elec. Div. (NEP)	N	N	N
	Los Angeles DW&P (NEP)	Y	Y	N
CO	Public Service Co. of CO (REI)	Y	Y	Y
	Colorado Springs DPU (REP)	Y	Y	Y
	Greeley Gas Co. (RGI)	Y	Y	Y
	Iowa Electric L&P (RGI)	Y	Y	Y
	Northern Natural Gas (RGI)	Y	Y	Y
	Public Service Co. of CO (RGI)	Y	Y	Y
	Colorado Springs DPU	Y	Y	Y
CT	Connecticut L&P (REI)	Y	Y	Y
	Hartford Electric Light (REI)	Y	Y	Y
	United Illuminating (REI)	Y	Y	Y
	Connecticut L&P (RGI)	Y	Y	Y
	Connecticut Natural Gas (RGI)	Y	Y	Y
	Southern Conn. Gas (RGI)	Y	Y	Y
	Generic (4 REI, 3 RGI)	Y	Y	Y
IA	Generic (7 REI, 9 RGI)	Y	Y	Y
	Central Louisiana Elec. (REI)	na	na	na
LA	Louisiana Power & Light (REI)	na	na	na
	Southwestern Elec. Power (REI)	na	na	na
	Gulf State Utilities Co. (REI)	na	na	na
	Arkansas-Louisiana Gas Co. (RGI)	na	na	na
	Louisiana Gas Service Co. (RGI)	na	na	na
	Entex, Inc. (RGI)	na	na	na
	Southwest Louisiana EMC (NEC)	Y	Y	N

(continued next page)

N: no REI: Regulated electric, investor-owned NEI: Nonregulated electric, investor-owned  
 Y: yes REP: Regulated electric, publicly owned NEP: Nonregulated electric, publicly owned  
 na: no answer REC: Regulated electric, cooperative NEC: Nonregulated electric, cooperative

\* Includes standards that utilities have put into effect and standards for which a determination to adopt has been made by the state regulatory authority or nonregulated utility.

Exhibit 3.x (continued)  
 CHARACTERISTICS OF ADVERTISING STANDARDS\*

State Utility (type)		10.1 Definitions of political and promotional advertising which conform with those given in PURPA sec. 115(h) or 304(b)	10.2 Prohibitions on the recovery of political and promotional advertising expenses from ratepayers	10.3 Requirements that political and promotional advertising expenses be recovered from shareholders or other owners
ME	Generic (3 REI)	Y	Y	Y
MN	Northern States Power (REI)	Y	Y	Y
	Interstate Power Co. (REI)	Y	Y	Y
	Otter Tail Power (REI)	Y	Y	Y
	Minnesota P&L (REI)	Y	Y	Y
	Minnesota Gas Co. (RGI)	Y	Y	Y
MS	Singing River EPA (NEC)	N	N	N
MO	Independence P&L (NEP)	Y	N	N
NB	Iowa Public Service (NGI)	Y	Y	Y
	Kansas-Nebraska NG (NGI)	Y	Y	Y
	Minnesota Gas Co. (NGI)	Y	Y	Y
	Northwestern Public Svc. (NGI)	Y	Y	Y
NM	Generic (5 REI, 1 RGI)	Y	Y	Y
NY	Generic (7 REI, 9 RGI)	Y	Y	Y
OH	Generic (8 REI, 6 RGI)	Y	Y	Y
OR	Generic (4 REI, 3 RGI)	Y	Y	Y
SC	Carolina Power & Light (REI)	Y	Y	Y
	Duke Power Co. (REI)	Y	Y	Y
	South Carolina E&G (REI)	Y	Y	Y
SD	Generic (6 REI, 4 RGI)	N	N	N
TX	Generic (14 REI)	Y	Y	Y
UT	Utah Power & Light (REI)	N	N	N
VT	Generic (2 REI)	Y	Y	Y
VA	City of Richmond, DPU (NGP)	Y	Y	Y
WI	Generic (6 REI, 7 RGI)	Y	Y	Y
<b>TOTAL 158 Utilities</b>		<b>YES: 138</b>	<b>137</b>	<b>135</b>
		<b>NO: 13</b>	<b>14</b>	<b>16</b>
		<b>na: 7</b>	<b>7</b>	<b>7</b>

N: no REI: Regulated electric, investor-owned NEI: Nonregulated electric, investor-owned  
 Y: yes REP: Regulated electric, publicly owned NEP: Nonregulated electric, publicly owned  
 na: no answer REC: Regulated electric, cooperative NEC: Nonregulated electric, cooperative

\* Includes standards that utilities have put into effect and standards for which a determination to adopt has been made by the state regulatory authority or nonregulated utility.

NONCOMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: ADVERTISING STANDARD\*

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation**	4.4 Opportunity for intervenor compensation**	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination	4.10	4.11 Determination made available to public
CA California PSC Anaheim Electric Division L.A. Dept. of Water & Power				6		11					
				1							
				1		1					
CT Connecticut				3							
FL Florida Generic				4		7					
IA Iowa Commerce Commission				7							
LA Louisiana PSC SW Louisiana Electric				4							
				1							
ME Maine PUC				3			3				
MN Minnesota				4							
MS Singing River Electric				1							
MO Independence Power & Light	1	1	1	1	1	1		1	1	1	

(continued next page)

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

\*\* Applies only to electric utilities.

Exhibit 3.y (continued)  
 NONCOMPLIANCE WITH PURPA PROCEDURAL REQUIREMENTS: ADVERTISING STANDARD\*

State Regulatory Authority or Utility	4.1 Prior public notice of hearing(s)	4.2 Hearing(s) open to the public	4.3 Opportunity for intervenor participation**	4.4 Opportunity for intervenor compensation**	4.5 Testimony or other evidence taken	4.6 Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA	4.7 Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA	4.8 Decision rendered based upon findings included in such determination and evidence presented during hearing	4.9 Written determination	4.10	4.11 Determination made available to public
NB Kansas-Nebraska Natural Gas NW Pub. Service	1	1			1	1		1	1		
NM New Mexico				5							
NY New York				7							
OH Cleveland Div. of Light & Power	1	1	1	1	1		1	1	1		1
OR Oregon Public Util. Comm.							7				
SC So. Carolina PSC				3		3					
SD So. Dakota PSC				10							
TX Texas PUC				14		14					
UT Utah						1					
VT Vermont PSC				2		2					
VA City of Richmond	1	1			1	1		1	1		1
WI Wisconsin PSC						13					
<b>TOTAL</b>	<b>5</b>	<b>5</b>	<b>2**</b>	<b>74**</b>	<b>5</b>	<b>56</b>	<b>11</b>	<b>5</b>	<b>5</b>	<b>4</b>	

\* Indicates number of utilities for which elements of the consideration process were reported to be not in compliance with PURPA procedural requirements or inconsistent with the status reported. Includes only state regulatory authorities and nonregulated utilities which had made a determination on the standard.

\*\* Applies only to electric utilities.

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As a result of 74 regulated and 5 nonregulated electric utilities putting this standard into effect, over 28 million customers nationally were covered by the advertising standard (see Exhibit 3.z). Only 21 percent of customers served by nonregulated electric utilities were covered by the standard compared to 38 percent of customers served by regulated electric utilities.

Only 50 of the 198 regulated gas utilities had put this standard into effect (see Exhibit 3.w), covering over 16 million gas customers (see Exhibit 3.z). The standard had been put into effect by relatively more nonregulated gas utilities than regulated gas utilities (5 out of 12 vs 50 out of 198); however, the standard covered a greater percentage of the customers served by regulated gas utilities than of the customers served by nonregulated gas utilities (39 vs 33 percent).

Although the utilities planned some follow-up monitoring activities, a consistent pattern or plan is not apparent (see Exhibit 3.aa). Both regulated and nonregulated utilities planned to hold public hearings to monitor impacts of putting the standard into effect. Some regulated utilities also planned to monitor changes in revenue levels. The nonregulated utilities' plans focused on questionnaires and examinations of system changes, in addition to public hearings.

### 3.5 CONCLUSIONS

Although progress has been relatively slow, DOE believes that the state regulatory authorities and nonregulated utilities will be able to meet the November 1980 deadline for considering and making determinations regarding the five regulatory standards for three reasons. First, most state regulatory authorities and nonregulated utilities that had not begun their consideration of the regulatory standards by June 30, 1979 had developed an adequate schedule for meeting the 1980 deadline. Second, none of the analyses or data requirements associated with the regulatory standards require long lead times (such as required by the collection of load research data needed for consideration of the cost-of-service standard). Third, as previously noted, most of the regulatory standards are not as controversial as the ratemaking standards. Thus, DOE expects consideration of the regulatory standards to proceed more rapidly once the process has been initiated.

Exhibit 3.2

CUSTOMERS COVERED BY THE ADVERTISING STANDARD

Type of Utility	Customer Group	Customers Covered Nationwide (000)	Customers Covered as a Percentage of All Customers	Customers Covered as a Percentage of Customers Served by Utilities Which Had Put the Standard Into Effect
<b>Regulated</b>				
- Electric	Residential	23,798.0	38.6	89.3
	Commercial & Industrial	3,069.0	34.0	90.1
	Other	204.1	42.4	87.8
- Gas	Residential	15,275.6	38.9	100.0
	Commercial & Industrial	1,089.9	34.1	100.0
	Other	7.5	15.0	100.0
<b>Nonregulated</b>				
- Electric	Residential	1,194.7	21.3	99.9
	Commercial & Industrial	168.5	24.7	100.0
	Other	6.0	6.4	100.0
- Gas	Residential	256.1	31.4	100.0
	Commercial & Industrial	47.0	51.2	100.0
	Other	0.1	58.8	100.0

Exhibit 3.aa  
 METHODS SELECTED TO MONITOR IMPACTS OF PUTTING  
 THE ADVERTISING STANDARD INTO EFFECT

Type of Utility	Monitoring Methods*				
	Consumer Questionnaire	Follow-up Public Hearings	Changes in System Characteristics	Revenue Levels	Other
Regulated					
- Electric	0.0	25.7	10.8	27.0	39.2
- Gas	0.0	36.0	8.0	38.0	50.0
Nonregulated					
- Electric	40.0	40.0	20.0	0.0	0.0
- Gas	0.0	0.0	0.0	0.0	0.0

\* Percentage of utilities for which a determination to adopt the standard had been made.

# 4

## STATE-BY-STATE CONSIDERATION OF PURPA STANDARDS

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In this chapter, we present the status of the PURPA consideration process for each state as of June 30, 1979. We first present an overview of those state regulatory authorities and nonregulated utilities that had made a determination to implement or adopt at least one standard by June 30, 1979. We then summarize the status of the consideration process on a state-by-state basis, and reproduce comments received from state regulatory authorities and nonregulated utilities in response to their review of draft copies of the state-by-state summaries.

### 4.1 OVERVIEW

Exhibit 4.a identifies each utility for which, at a minimum, a determination had been made to implement or adopt at least one standard as of June 30, 1979. For each standard for which a determination had been made the exhibit also indicates whether the action was taken before or after November 9, 1978, the date PURPA was enacted.\* As indicated, a substantial proportion of the state regulatory authorities and utilities that reported they had made a determination for one or more of the standards as of June 1979 had actually done so prior to the enactment of PURPA. Specifically, for the cost-of-service, interruptible rates, and load management techniques standards, about 70 percent of the determinations reported by state regulatory authorities and nonregulated utilities represent actions taken prior to November 1978; this figure is about 85 percent for the declining-block, time-of-day, and seasonal rates standards. A large percentage of the determinations reported for the five regulatory standards also represent actions taken prior to November 1978: approximately 60 percent for the termination of service

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\* In addition, the exhibit identifies each standard that had been rejected, either as a result of consideration proceedings or subsequent to putting the standard into effect.

States and Utilities That Have Adopted Standards

State	Utility	Cost-of-Service	Declining-Block Rates	Time-of-Day Rates	Seasonal Rates	Interruptible Rates	Load Management Techniques	Master Metering	Automatic Adjustment Clauses	Information to Consumers	Termination to Consumers	Advertising	
CA	CP National Corp.	○	○	○	○	○	○					○	
	Pacific Gas & Electric	○	○	○	○	○	○					○	
	Pacific Power & Light	○	○	○	○	○	○					○	
	San Diego Gas & Electric Co.	○	○	○	○	○	○					○	
	Sierra Pacific Power Co.	○	○	○	○	○	○					○	
	Southern California Edison	○	○	○	○	○	○					○	
	CP National Corp.												○
	Pacific Gas & Electric Co.												○
	San Diego Gas & Electric												○
	Southern California Edison												○
	Southwest Gas Corp.												○
	Anaheim Public Utility	○		5	5	5	○					○	○
	Los Angeles Dept. of Water & Power												
CO	Central Telephone & Utility Co.	○											
	Public Service Co. of Colorado							○				○	
	Colorado Springs Dept. of Public Utilities											○	
	Greely Gas Co.											○	
	Iowa Electric Light & Power Co.											○	
	Peoples Natural Gas Div. of Northern Natural Gas											○	
	Public Service Co. of Colorado											○	
Colorado Springs Dept. of Public Utilities											○		
CT	Connecticut Light & Power Co.		○					○				○	
	Hartford Electric Light Co.		○					○				○	
	United Illuminating Co.		○					○				○	
	Connecticut Light & Power Co.											○	

Key



-  Adopted, implemented, or rejected standard as of June 30, 1979.
-  Adopted, implemented, or rejected standard as of November 1978.
- 8** Progressed from adoption to implementation since November 1978.
- 5** Standard rejected.
- 9** Standard implemented but subsequently rejected.

Exhibit 4.a (continued)

States and Utilities That Have Adopted Standards

State	Utility	Cost of Service	Declining Block Rates	Time-of-Day Rates	Seasonal Rates	Interruptible Rates	Load Management Techniques	Master Metering	Automatic Adjustments	Information to Consumers	Termination of Service	Advertising
CT	Connecticut Natural Gas Corp.											○
	Southern Connecticut Gas Co.											○
DC	Potomac Electric Power Co.			○								
	Washington Gas Light											
FL	Florida Power Corp.											
	Florida Power & Light											
	Gulf Power Co.											
	Tampa Electric Co.											
	City Gas Co.											
	Florida Gas Co.											
	Peoples Gas System											
	Jacksonville Electric Authority									○		
	City of Tallahassee							○				
	IA	Iowa Electric						○	○	○		
Iowa Public Service Co.							○	○	○			○
Iowa Power & Light							○	○	○			○
Interstate Power							○	○	○			○
Iowa-Illinois							○	○	○			○
Iowa Southern							○	○	○			○
Union Electric							○	○	○			○
Iowa Electric												○
Iowa Public Service												○
Iowa Power & Light												○
Interstate Power												○
Iowa-Illinois												○
Iowa Southern												○
	Peoples Natural Gas Div. of Northern Natural Gas											○

Key

- Adopted, implemented, or rejected standard as of June 30, 1979.
- Adopted, implemented, or rejected standard as of November 1978.
- 8 Progressed from adoption to implementation since November 1978.
- 5 Standard rejected.
- 9 Standard implemented but subsequently rejected.

States and Utilities That Have Adopted Standards

State	Utility	Cost-of-Service	Declining Block Rates	Time-of-Day Rates	Seasonal Rates	Interruptible Rates	Load Management Techniques	Master Metering	Automatic Adjustment	Information to Consumers	Termination of Service	Advertising
IA	North Central											○
	Minnesota Gas Co.											○
	Muscatine Power & Water						○			○		
KY	Green River RECC							○				
	Henderson Union RECC							○				
	Kentucky Power							○				
	Kentucky Utilities							○				
	Louisville Gas & Electric							○				
	Union Light, Heat & Power							○				
	Louisville Gas & Light											
	Union Light, Heat & Power											
	Columbia Gas											
	Equitable Gas											
	Inland Gas											
Western Kentucky Gas												
LA	Central Louisiana Electric						○					○
	Gulf States Utilities Co.						○					○
	Louisiana Power & Light						○					○
	Southwestern Electric Power Co.						○					○
	Arkansas Louisiana Gas											○
	Entex Inc.											○
	Louisiana Gas Service											○
ME	Southwest Louisiana Electric Membership Corp.						○		○	○		○
	Bangor Hydro Electric Co.							5				
	Central Maine Power Co.							5				
	Public Service Co. of New Hampshire							5				

Key



-  Adopted, implemented, or rejected standard as of June 30, 1979.
-  Adopted, implemented, or rejected standard as of November 1978.
- 8** Progressed from adoption to implementation since November 1978.
- 5** Standard rejected.
- 9** Standard implemented but subsequently rejected.

Exhibit 4.a (continued)

States and Utilities That Have Adopted Standards

State	Utility	Cost of Service	Declining-Block Rates	Time-of-Day Rates	Seasonal Rates	Interruptible Rates	Load Management Techniques	Master Metering	Automatic Adjustment Clauses	Information to Consumers	Termination of Service	Advertising
MA	Boston Edison Co.										⊙	
	Brockton Edison Co.										⊙	
	Cambridge Electric Light Co.										⊙	
	Fall River Electric Light Co.										⊙	
	Massachusetts Electric Co.										⊙	
	New Bedford Gas & Edison Light										⊙	
	Western Massachusetts Electric Co.										⊙	
MI	Consumers Power Co.						⊙	⊙				
	Detroit Edison Co.						⊙	⊙				
	Indiana & Michigan Electric Co.							⊙				
	Lansing Board of Water & Light	⊙	⊙	⊙	⊙		⊙				⊙	
MN	Northern States Power Co.	⊙	⊙	⊙	⊙	⊙		⊙	⊙			⊙
	Interstate Power Co.							⊙	⊙			⊙
	Otter Tail Power Co.		⊙	⊙	⊙	⊙	⊙	⊙	⊙			⊙
	Minnesota Power & Light	⊙	⊙	5	9	⊙		⊙	⊙			⊙
	Minnesota Gas Co.											⊙
MS	Singing River Electric Power Association											
MO	City of Independence Power & Light Dept.				⊙							⊙
NB	Kansas Nebraska Natural Gas Co.											⊙
	Minnesota Gas Co.											⊙
	Iowa Public Service Co.										⊙	⊙
	Northwestern Public Service Co.											⊙
NH	Public Service Co. of New Hampshire											
	Bay State Gas											
NM	New Mexico Electric Service Co.											
	Community Public Service Co.											
	El Paso Electric Co.											

Key

- ⊙ Adopted, implemented, or rejected standard as of June 30, 1979.
- ⊙ Adopted, implemented, or rejected standard as of November 1978.
- 8 Progressed from adoption to implementation since November 1978.
- 5 Standard rejected.
- 9 Standard implemented but subsequently rejected.

Exhibit 4.a (continued)

States and Utilities That Have Adopted Standards



State	Utility	Cost-of-Service	Declining-Block Rates	Time-of-Day Rates	Seasonal Rates	Interruptible Rates	Load Management Techniques	Meter Metering	Automatic Adjustment Clauses	Information to Consumers	Termination of Service	Advertising
NM	Public Service Co. of New Mexico											
	Southwestern Public Service Co.											
	Gas Co. of New Mexico											
NY	Central Hudson Gas & Electric	○	○	○			○			○	○	
	Consolidated Edison Co. of New York			○			○			○	○	
	Long Island Lighting Co.	○	○	○			○			○	○	
	New York State Electric & Gas						○			○	○	
	Niagra Mohawk Power Corp.						○			○	○	
	Orange & Rockland Utilities Inc.			○			○			○	○	
	Rochester Gas & Electric Corp.						○			○	○	
	Brooklyn Union Gas Co.									○	○	
	Columbia Gas Co. of New York									○	○	
	Consolidated Edison Co. of New York									○	○	
	Long Island Lighting Co.									○	○	
	National Fuel Gas Distribution Corp.									○	○	
	New York State Electric & Gas Corp.									○	○	
	Niagra Mohawk Power Corp.									○	○	
	Orange & Rockland Utilities Inc.									○	○	
Rochester Gas & Electric Corp.									○	○		
NC	Carolina Power & Light Co.	○	○	○								
	Duke Power Co.	○	○	○								
	Virginia Electric & Power	○	○	○								
OH	Cincinnati Gas & Electric		○	○	○		○		○		○	
	Cleveland Electric Illuminating		○	○	○	○	○		○		○	
	Columbus & Southern Ohio Electric		○	○	○	○	○		○		○	
	Dayton Power & Light		○	○	○		○		○		○	
	Monongahela Power Co.		○	○	○		○		○		○	
	Ohio Edison Co.		○	○	○		○		○		○	

Key

- Adopted, implemented, or rejected standard as of June 30, 1979.
- Adopted, implemented, or rejected standard as of November 1978.
- 8 Progressed from adoption to implementation since November 1978.
- 5 Standard rejected.
- 9 Standard implemented but subsequently rejected.



States and Utilities That Have Adopted Standards

State	Utility	Cost-of-Service	Declining-Block Rates	Time-of-Day Rates	Seasonal Rates	Interruptible Rates	Load Management Techniques	Master Metering	Automatic Adjustment Clauses	Information to Consumers	Termination of Service	Advertising
OH	Ohio Power Co.		⊙	⊙	⊙	⊙	⊙		⊙			⊙
	Toledo Edison Co.		⊙	⊙	⊙		⊙		⊙			⊙
	Cincinnati Gas & Electric											⊙
	Columbia Gas of Ohio											⊙
	Dayton Power & Light Co.											⊙
	East Ohio Gas Co.											⊙
	National Gas & Oil Co.											⊙
	West Ohio Gas Co.											⊙
	Cleveland Division of Light & Power			⊙					⊙		⊙	5
OR	CP National Corp.	⊙	⊙					⊙				⊙
	Idaho Power	⊙	⊙					⊙				⊙
	Pacific Power & Light	⊙	⊙	⊙	⊙			⊙				⊙
	Portland General Electric	⊙	⊙	⊙	⊙			⊙				⊙
	Cascade Natural Gas Corp.											⊙
	CP National Corp.											⊙
	Northwest Natural Gas											⊙
PA	Duquesne Light Co.			⊙	⊙	⊙		⊙	8	8		
	Metropolitan Edison Co.		⊙	⊙		⊙		8	⊙	8	8	
	Pennsylvania Electric Co.		⊙	⊙	5	⊙		⊙	8	8		
	Pennsylvania Power & Light		⊙					⊙	8	8		
	Pennsylvania Power Co.	⊙	⊙	⊙	5	⊙	⊙	⊙	8	8	8	
	Philadelphia Electric Co.		⊙	⊙	⊙	⊙		⊙	8	8		
	UGI-Luzerne Electric Div.	⊙	⊙	⊙		⊙	⊙	⊙	8	8		
	West Pennsylvania Power Co.		⊙	⊙		⊙	⊙	⊙	8	8		
	Carnegie Natural Gas Co.									8		

- Key**
-  Adopted, implemented, or rejected standard as of June 30, 1979.
  -  Adopted, implemented, or rejected standard as of November 1978.
  - 8** Progressed from adoption to implementation since November 1978.
  - 5** Standard rejected.
  - 9** Standard implemented but subsequently rejected.

States and Utilities That Have Adopted Standards

State	Utility	Cost-of-Service	Declining-Block Rates	Time-of-Day Rates	Seasonal Rates	Interruptible Rates	Load Management Techniques	Master Metering	Automatic Adjustment Clauses	Information to Consumers	Termination of Service	Advertising
PA	Columbia Gas of Pennsylvania									5		
	Equitable Gas Co.									8		
	National Fuel Gas Distribution Corp.									8		
	North Pennsylvania Gas & Water									8		
	Peoples Natural Gas Co.									8		
	Pennsylvania Fuel Gas Inc.									8		
	Philadelphia Electric Co.									8		
	T.W. Philips Gas & Oil Co.									8		
UGI Corp.									8			
SC	Carolina Power & Light	8	8	8								8
	Duke Power Co.	8										8
	South Carolina Electric & Gas	8	8	8	8							8
SD	Black Hills Power & Light								8	8	8	8
	Iowa Public Service Co.								8	8	8	8
	Montana-Dakota Utility Co.								8	8	8	8
	Northern States Power								8	8	8	8
	Northwestern Public Service Co.	8	8	8					8	8	8	8
	Otter Tail Power Co.								8	8	8	8
	Iowa Public Service Co.								8	8	8	8
	Minnesota Gas Co.									8	8	8
	Montana-Dakota Utilities Co.									8	8	8
Northwestern Public Service									8	8	8	
TX	Central Power & Light		8									8
	Community Public Service		8									8
	Dallas Power & Light		8	8								8

- Key**
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States and Utilities That Have Adopted Standards

State	Utility	Cost-of-Service	Declining-Block Rates	Time-of-Day Rates	Seasonal Rates	Interruptible Rates	Load Management Techniques	Master Metering	Automatic Adjustment Clauses	Information to Consumers	Termination of Service	Advertising	
TX	El Paso Electric Co.		○	○								○	
	Gulf States Utilities Co.		○	○								○	
	Houston Lighting & Power		○	○								○	
	Southwestern Electric Power											○	
	Southwestern Electric Service		○	○								○	
	Southwestern Public Service		○	○								○	
	Texas Electric Service		○	○								○	
	Texas Power & Light		○	○								○	
	West Texas Utilities Co.												○
	Pedernales Electric Coop.												○
	Lower Colorado River Authority		○										○
UT	Utah Power & Light					○		○	○	○			
	Moon Lake Electric Association							○		○			
	CP National Corp.							○		○			
	Mountain Fuel Supply									○			
VT	Green Mountain Power Corp.	○	○	○						○	○		
	Central Vermont Public Service Co.	○	○	○	○			○		○	○		
VA	City of Richmond									○	○		
WA	Seattle City Light Department						○						
WI	Lake Superior District Power Co.	○	○	5		○			○	○	○		
	Madison Gas & Electric	○	○	○	○	8	○		○	○	○		
	Northern States Power Co.	○	○	8	5	○	○		○	○	○		
	Wisconsin Electric Power Co.	○	○	○	○	8	○		○	○	○		
	Wisconsin Power & Light Co.	○	8	○	5	○	○		○	○	○		
	Wisconsin Public Service Corp.	○	8	○	○		○		○	○	○		



Key

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**States and Utilities That Have Adopted Standards**

State	Utility	Cost of Service	Declining-Block Rates	Time-of-Day Rates	Seasonal Rates	Interruptible Rates	Load Management Techniques	Master Metering	Automatic Adjustment Clauses	Information to Consumers	Termination of Service	Advertising
WI	Madison Gas & Electric									○	○	
	Northern States Power Co.									○	○	
	Wisconsin Fuel & Light Co.									○	○	
	Wisconsin Gas Co.									○	○	
	Wisconsin Natural Gas									○	○	
	Wisconsin Power & Light Co.									○	○	
	Wisconsin Public Service Corp.									○	○	
WY	Black Hills Power & Light						5					
	Montana-Dakota Utilities Co.						5					
	Pacific Power & Light						5					
	Utah Power & Light						5					
	Cheyenne Light Fuel & Power											
	Kansas Nebraska Natural Gas											
	Montana Dakota Utilities Co.											
	Mountain Fuel Supply											

**Key**

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standard; more than 70 percent for the master metering and information to consumers standards; and about 85 percent for the automatic adjustment clauses and advertising standards. Even though most determinations reported for the PURPA standards represent actions taken prior to the enactment of PURPA, state regulatory authorities and nonregulated utilities reported general compliance with almost all of the procedural requirements of PURPA, which may indicate that the requirements established by PURPA represent a widespread procedural norm for the late 1970s.

There were two notable exceptions, however. First, only a small number of state regulatory authorities and nonregulated utilities reported that they had complied with the PURPA requirement that they provide the opportunity for intervenor compensation. And second, because so many determinations on these standards had been made prior to November 1978, many state regulatory authorities and nonregulated utilities reported that they had made no determination whether it was appropriate to implement a standard to carry out the three purposes of PURPA. The conservation, efficiency and equity purposes of PURPA, however, are not new concepts.

Those state regulatory authorities and nonregulated utilities that reported making a determination to implement or adopt a standard prior to November 1978 may determine that their consideration process meets the requirements of substantial conformance as specified in Sections 124 and 310 of PURPA. However, such a determination was reported for only two utilities, both located in Missouri.

#### 4.2 STATE-BY-STATE PROGRESS

In the remainder of this section, we summarize progress in each state as of June 30, 1979 in considering the PURPA standards, making determinations on them, and putting them into effect. A utility-by-utility compilation of the status of the consideration process as of June 30, 1979, as reported by state regulatory authorities and nonregulated utilities, is shown in Exhibit 4.b.

In the state-by-state narrative summaries which follow, please note the following points:

- All data, such as the status of the consideration process for each utility or the numbers of customers covered by each standard put into effect by utilities, represent the status as of June 30, 1979 as reported on Form ERA-166 by state regulatory authorities and nonregulated utilities.

- No independent verification of data on these forms has been made by DOE. The discussion assumes that the procedure for considering the standard did, in fact, substantially conform to PURPA requirements -- this assumption has been made for reporting purposes only, and in no way reflects a judgment by DOE concerning substantial conformance.
- The term "covered by" refers to customers who were subject to a standard actually put into effect by a utility, as contrasted with a standard merely implemented (adopted) by a state regulatory authority as a matter of policy.
- References to the total numbers of electric and gas customers in each state pertain only to customers served by utilities that are covered by PURPA. The total number of electric and gas customers in the entire state will be larger if the state has additional electric or gas utilities not covered by PURPA.
- Similarly, references to the numbers of electric and gas utilities regulated by a state regulatory authority include only those utilities covered by PURPA. Several state regulatory authorities regulate other utilities that are not covered by PURPA.

DOE distributed draft copies of the state-by-state summaries to each state regulatory authority and covered nonregulated utility for review and response. Their responses and comments are presented verbatim in Section 4.3 of this report. The following state-by-state summaries reflect corrections of any transcription errors noted in these comments.

Only the information originally reported on Form ERA-166 is reflected in the exhibits and in analytical descriptions based upon these exhibits (e.g., the status of the consideration process, the numbers of customers covered by standards put into effect, or the characteristics of standards for which determinations had been made to implement or adopt). Time did not permit the submission and analysis of amended or revised reports.

#### Alabama

The Alabama PSC, which regulates one electric and two gas utilities, had not begun formal consideration of any of the PURPA standards. However, Alabama Power Company offered seasonal and interruptible rates to its customers. According to the Alabama PSC, all three utilities met the requirements of the termination of service standard. The Alabama PSC did not consider the advertising standard, citing the Alabama Supreme Court ruling that "reasonable advertising expenses are a valid part of operating expenses."

Formal hearings on the regulatory standards were scheduled for January 1980 with a draft decision targeted for spring 1980. Rate design hearings were scheduled to begin in March 1980. The PSC planned to begin evaluating the evidence presented in the course of that hearing by September 1980.

The City of Dothan, a nonregulated, publicly owned electric utility, had made no progress in considering the PURPA standards, and presented no plans in this report. However, Dothan did plan to implement a load management program by the end of FY1980.

In conclusion, none of Alabama's 980,000 electric customers or its 430,000 gas customers were covered by any of the PURPA standards.

#### Alaska

PURPA covers only one electric cooperative and one gas utility in Alaska. Both are regulated by the Alaska PUC, which had not begun consideration of any of the PURPA standards. The PUC reported that it had developed a plan to begin consideration, but did not provide details of the plan.

As a result, none of Alaska's 45,000 electric customers or its 35,000 gas customers were covered by any of the PURPA standards.

#### Arizona

The Arizona Corporation Commission regulates three electric and three gas utilities, all of which are investor-owned. The commission reported beginning consideration of all the standards except interruptible rates and information to consumers. The commission planned to hold generic hearings and make a determination on the regulatory standards by the end of 1980 and on the ratemaking standards by October 1981.

The Salt River Project Agricultural Improvement and Power District (SRP), a nonregulated, publicly owned electric utility, had not yet begun the PURPA consideration process. It planned, however, to render a decision regarding the regulatory standards by October 1980 and the ratemaking standards by September 1981.

In conclusion, PURPA standards had not been considered for Arizona's utilities which serve 840,000 electric customers and 400,000 gas customers.

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### Arkansas

The Arkansas PSC regulates five electric and three gas utilities. The PSC reported plans to hold generic hearings for each PURPA standard. It had initiated the consideration process for the cost-of-service, load management, and information to consumers standards. A hearing was scheduled to be held on the termination of service standard in December 1979.

The PSC planned to reach a determination on all the regulatory standards by September 1980 and on the ratemaking standards by September 1981.

None of Arkansas' 660,000 electric customers or its 790,000 gas customers were covered by any of the PURPA standards.

### California

All of the determinations on PURPA standards reported by the California PUC represented actions taken before November 1978. The California PUC had made determinations to implement all six ratemaking standards through generic proceedings, but none of the six electric utilities it regulates had put these standards into effect. The advertising standard had been put into effect by all five gas utilities and six electric utilities under the CPUC's jurisdiction.

In 1978, the CPUC prohibited master metering in new multi-unit residential buildings. It was reconsidering some evidence and planned to consider a similar rule for other customer classes. The other regulatory standards (with the exception of the automatic adjustment clauses standard\*) were to be considered through generic hearings to be held during 1980.

The cost-of-service, declining-block rates, and seasonal rates standards which the CPUC had made a determination to implement were planned to cover almost all electric customers in all classes when put into effect. The time-of-day and interruptible rates standards would cover less than 1 percent of commercial, industrial, and other customers and none of the residential customers, while the load management standard would cover no customers. Examination of the PUC's responses indicated that there may be some confusion between

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\* The California PUC does not have automatic adjustment clauses, but it permits energy costs to be recovered through other types of clauses. The level of revenues to be collected through these clauses is determined through semiformal proceedings.

the number of customers served by the utility and the number actually to be covered under a resulting rate. The advertising standard covered all electric and gas customers.

For the cost-of-service standard, the California PUC reported prescribing the use of accounting cost, future cost, and marginal cost methodologies; the allocation of costs to major customer groups; and the use of own-system load research data. However, it did not report requiring identification of customer, demand, and energy cost components or identification of time-related cost differentials.

Two nonregulated utilities had made considerable progress regarding the PURPA standards. The Anaheim Electric Division had put all the ratemaking and regulatory standards into effect, with the exception of the time-of-day, seasonal rates, and interruptible rates standards, which it had considered and rejected, and the information to consumers standard, which it had made a determination to adopt but had not yet put into effect. The Los Angeles Department of Water and Power had not yet considered the seasonal rates, interruptible rates, and load management standards, but it planned to make a final determination on these standards by June 1980. Otherwise, it had put all the remaining ratemaking and regulatory standards into effect.

All customers in all classes were covered by the standards put into effect by these two utilities, with the exception of the load management techniques standard of Anaheim which covered only about one-third of the commercial and industrial customers and one-tenth of the residential customers.

In making a determination to implement the cost-of-service standard, both utilities allocated costs to major customer groups, identified cost components, and specified an accounting cost methodology. In addition, Anaheim specified a future cost methodology, while Los Angeles specified a marginal cost methodology. Only Los Angeles identified time-related cost differentials and used own-system load research data.

The other 12 nonregulated utilities in the state had made minimal progress regarding the PURPA standards. Most planned to hold hearings between May 1980 and October 1981; however, specific hearing dates had not yet been set.

In summary, the advertising standard had been put into effect for 9.0 million electric customers and 6.7 million gas customers. About 13-14 percent of California's customers were covered by each of the following: the cost-of-service; declining-block rates; master metering; automatic adjustment clauses; information to consumers; and termination of service standards. The load management techniques standard had been put into effect for 10,000 customers; the seasonal rates standard for 4,000 customers; and the interruptible rates standard for none.

Colorado

In a generic hearing after November 1978, the Colorado PUC had made a determination to implement all the ratemaking standards for the three electric utilities it regulates. A determination to implement the cost-of-service standard had already been made for Central Telephone and Utility prior to November 1978. In addition, before November 1978, a determination to implement the advertising standard had been made for all the gas and electric utilities except Central Telephone and Utility and Kansas-Nebraska Natural Gas; and a determination to implement the automatic adjustment clauses standard had been made for Public Service Company of Colorado.

Hearings had been scheduled on the master metering standard and had been completed on the termination of service standard. No hearings had yet been scheduled for the information to consumers standard. Consideration of the automatic adjustment clauses standard for Central Telephone and Utility was on the agenda for open meetings.

On the cost-of-service standard, the Colorado PUC required allocation of costs to major customer groups; identification of customer, demand, and energy cost components; and the collection of own-system load research data. The only prescribed costing methodology was accounting cost. The identification of time-related cost differentials was not required. In these determinations, the Colorado PUC had reported compliance with all PURPA procedural requirements.

The Western Area Power Administration (WAPA), a federal agency, has rate-setting responsibility for power marketed and/or transmitted by 11 federal projects, each with its own rates. For those projects where PURPA standards apply, WAPA had not yet begun the PURPA consideration process, but it planned to do so at its next rate proceedings.

Although determinations had been made for several of the PURPA standards, none had been put into effect by the utilities for any of Colorado's 840,000 electric and 750,000 gas customers.

Connecticut

The three electric utilities regulated by the Connecticut Division of Public Utility Control (DPUC) had put into effect the time-of-day rates, automatic adjustment clauses, and advertising standards prior to November 1978. The three regulated gas utilities had put the advertising standard into effect prior to November 1978. The master metering standard was not considered by the DPUC because legislative action had made it part of the state building code.

The consideration process had begun for all the other ratemaking standards as well as the termination of service standard. Generic hearings were scheduled, and a final determination was expected before January 1981. Hearings had not yet been scheduled on the information to consumers standard.

Putting the time-of-day rates standard into effect without making a determination to implement the cost-of-service standard did not permit the DPUC to employ optimum methodologies to identify time-related cost differentials and to determine the costs and benefits of time-of-day rates for each class of service.

In conclusion, all of Connecticut's 1.1 million electric customers were covered by the time-of-day rates, automatic adjustment clauses, and advertising standards. All of its 350,000 gas customers were also covered by the advertising standard. No customers were covered by any of the remaining five ratemaking standards or three regulatory standards.

#### Delaware

The Delaware PSC regulates only one utility, which serves both gas and electric customers. On October 29, 1979, generic hearings were started on all the ratemaking standards; a decision was expected by March 1980. Hearings on the regulatory standards for electric customers were scheduled for January 1980; no decision date was projected. The PSC had not yet scheduled hearings for the gas customers.

As a result, none of Delaware's 170,000 electric and 70,000 gas customers were covered by any of the PURPA standards.

#### District of Columbia

Since November 1978 the PSC of the District of Columbia had made a determination to implement the termination of service standard for the one electric utility and one gas utility under its jurisdiction; each had put the standard into effect. The PSC had made a determination regarding the time-of-day rates standard, but it was still under review and had not been implemented. In action taken before November 1978, the Potomac Electric Power Company had put the seasonal rates standard into effect.

Hearings were in progress on the cost-of-service, declining-block rates, and advertising standards. The PSC had not projected a final decision date for any of these standards, nor had hearings been scheduled for the remaining standards.

Because the cost-of-service standard had not yet been implemented, questions may be raised about the methodology employed by the PSC to determine seasonal and time-of-day cost differentials and the costs and benefits of time-of-day rates for each customer class.

The seasonal rates standard covered all of the District's 190,000 electric customers in all classes, while the termination of service standard covered all 160,000 residential electric customers and 130,000 residential gas customers.

### Florida

The Florida PSC regulates four electric and three gas utilities covered by PURPA, and has limited jurisdiction -- with respect to rate structure only -- over five municipal and two cooperative electric utilities covered by PURPA. These seven municipal or cooperative electric utilities are reported to have agreed to become party to the consideration and determination process of the Florida PSC with regard to the ratemaking standards.

The PSC reported that the advertising standard had been put into effect by its covered electric and gas utilities. However, the 230,000 customers that the Florida PSC reported as covered represented only the approximate number of customers of regulated gas utilities in Florida; as a result, it is not clear whether electric customers were covered as well.\*

None of the investor-owned utilities use automatic adjustment clauses; fuel adjustments are made only after formal hearings. The PSC had opened dockets to facilitate study of the ratemaking standards for all Florida utilities. Practices related to master metering, information to consumers, and termination of service standards were to be reviewed through rulemaking proceedings; hearings were to be held after proposed rule changes had been formulated.

In brief, none of the 3.7 million customers of the 11 electric utilities were covered by any of the ratemaking standards. Moreover, none of 3.1 million customers of the four electric utilities regulated by the PSC for the purposes of the regulatory standards are covered by any of those standards, with the possible exception of the advertising standard (as noted earlier).

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\* Included with the PSC's comments on this section, received April 10, 1980, was a correction to its report indicating the 3.1 million electric customers were also covered by the advertising standard.

The five municipal and two cooperative electric utilities are autonomous with respect to the regulatory standards. Lakeland Department of Electricity planned to consider and reach a determination on all the standards by November 1980, with the exception of the automatic adjustment clauses. It had not planned to consider this standard, since no automatic adjustment clause was currently in effect. The Gainesville/Alachua Board, which had not taken any action by June 30, 1979, subsequently reported to DOE that it had put into effect all the regulatory standards, except the automatic adjustment clauses standard, in September 1979. The utility had decided to hold further public hearings on the automatic adjustment clauses by November 9, 1980. As of November 1978, the City of Tallahassee had put the automatic adjustment clauses standard into effect, but no specific hearing or determination dates had been set for the remaining regulatory standards. The city planned to hire a consultant in 1980 to help consider its response to PURPA.

Jacksonville Electric Authority had already put the termination of service standard into effect as of November 1978, but it had not established a schedule for consideration of the other regulatory standards. Clay Electric Cooperative planned to consider the standards in the second quarter of 1980 and reach determinations during the third quarter. No hearings had been scheduled for the Lee County Electric Cooperative; however, it expected to reach a decision on all the standards by November 1980.

As of June 30, 1979, 210,000 of the 580,000 customers covered by these seven electric utilities were covered by the termination of service standard put into effect by Jacksonville; 55,000 by the automatic adjustment clauses standard put into effect by Tallahassee; and none by the master metering, information to consumers, or advertising standards.

### Georgia

The Georgia PSC, which regulates two electric and four gas utilities, had not yet considered any of the standards. Hearings on four regulatory standards were planned for spring and summer 1980; a determination was expected in late summer. The Georgia legislature in 1979 abolished the use of automatic adjustment clauses. The PSC had not made plans for considering the ratemaking standards.

There are three nonregulated electric utilities in Georgia that are covered by PURPA. The Flint Electric Membership Corporation (EMC) had scheduled hearings planned for completion by June 30, 1980. Jackson EMC planned to complete the consideration process by the third quarter of 1980. Albany Water, Gas & Light Commission had not

begun consideration nor had it formulated any plan for reviewing and reaching determinations on the standards.

None of the 1.3 million electric or 800,000 gas customers in Georgia were covered by any of the PURPA standards.

#### Hawaii

Generic hearings for the ratemaking standards had been completed in Hawaii. The Hawaii PSC furnished no information regarding a decision on those standards for the one electric utility it regulates. Proceedings on the regulatory standards were scheduled for early 1980. Hawaii has no gas utilities covered by PURPA.

In summary, none of the 210,000 electric customers in Hawaii were covered by any of the PURPA standards.

#### Idaho

Hearings were under way on the termination of service and advertising standards for the four regulated electric and two regulated gas utilities in Idaho that are covered by PURPA, and on the information to consumers standard for the four electric utilities. No action had been taken on the remaining standards, but the Idaho PSC planned to begin proceedings on the regulatory standards by spring 1980 and on the ratemaking standards by September 1980.

None of the 330,000 electric customers or 110,000 gas customers in Idaho were covered by any of the PURPA standards as of June 30, 1979.

#### Illinois

The Illinois Commerce Commission had not yet begun consideration of any of the PURPA standards for the seven electric and nine gas utilities that it regulates. The commission intended to complete its investigation of the ratemaking standards within the required reporting period; it planned to base its decision largely on the findings of a generic rate case opened in 1976. It planned to hold generic hearings on the master metering and advertising standards and to reopen a docket dealing with the termination of service and information to consumers standards. The commission had also initiated a proceeding to consider the automatic adjustment clauses standard.

The one nonregulated municipal electric authority in the state, Springfield Water, Light, & Power, planned to begin consideration of all the standards in the first quarter of 1980.

In summary, none of the 4.0 million electric or 3.1 million gas customers in Illinois were covered by any of the PURPA standards.

Indiana

The Indiana PSC had held hearings on the information to consumers, termination of service, and advertising standards for the six electric and six gas utilities it regulates. The automatic adjustment clauses and ratemaking standards were to be considered in early 1980. Promulgation of rules to prohibit master metering and an order to determine hearing format, costing methodology, and sequence of consideration for the ratemaking standards were pending before the PSC.

As of June 30, 1979, none of Indiana's 1.7 million electric customers or its 1.3 million gas customers were covered by any of the PURPA standards.

Iowa

The Iowa State Commerce Commission planned to begin consideration of the ratemaking standards by November 9, 1980, and to make a determination by November 1981. Prior to November 9, 1978, the Commission had made a determination to adopt all the regulatory standards for the seven electric and nine gas utilities under its jurisdiction. These utilities had also put all but two of these standards into effect. Between November 9, 1978, and June 30, 1979, these same utilities put the termination of service standard into effect, which left only the automatic adjustment clauses standard to be acted upon. The automatic adjustment clauses standard was adopted prior to November 1978 by the Commission and all regulated utilities ordered to effect compliance by January 1, 1980. The Commission reported compliance with procedural requirements of PURPA.

The termination of service and master metering standards, which were already part of the Muscatine Power & Water Tariff as of November 1978, were the only standards that had been considered by Iowa's single covered nonregulated utility. The City of Muscatine planned to complete consideration of the PURPA standards and make determinations by the first quarter of FY1981.

Iowa has 880,000 electric and 680,000 gas customers who were covered by PURPA. As of June 30, 1979, almost all of these customers were covered by the PURPA standards on master metering, information to consumers, termination of service, and advertising, while none were covered by the automatic adjustment clauses standard or by any of the six ratemaking standards.

Kansas

The Kansas State Corporation Commission had begun the consideration process for all the standards for the six electric utilities under

its authority. During 1978 the commission initiated a "general investigation to examine pricing of electric utility services ..."; however, a detailed schedule of completion dates for each standard had not yet been developed. The commission also reported that, over the following year, they would formulate a specific plan for considering and making determinations regarding the standards affecting gas utilities.

The Kansas City Board of Public Utilities, the only covered municipal utility in Kansas, had not begun consideration of any of the PURPA standards. The board hoped to begin procedures on the standards by January 1980.

As of June 30, 1979, none of the 720,000 electric and 650,000 gas customers in Kansas were covered by any of the PURPA standards.

#### Kentucky

The Kentucky Energy Regulatory Commission (ERC) had begun consideration of the ratemaking standards for the four investor-owned and two cooperative electric utilities under its jurisdiction. The utilities had put the automatic adjustment clauses standard into effect prior to November 1978. Since then, the utilities had put the termination of service standard into effect, following an ERC determination with procedures that were reported to comply with PURPA requirements. Hearings had been completed for the advertising standard.

Consideration of the master metering and information to consumers standards was scheduled to begin by January 1980 and be completed by May 1980. A determination on the ratemaking standards was expected by November 1981. The ERC planned to hold generic hearings as part of these consideration processes.

As of June 30, 1979, Kentucky's 870,000 electric customers were covered by the automatic adjustment clauses and termination of service standards. Its 730,000 residential gas customers and a small number of its other 60,000 gas customers were also covered by the termination of service standard. No electric or gas customers were covered by any of the remaining PURPA standards.

#### Louisiana

The Louisiana PSC submitted reports for four of the five electric utilities and all three gas utilities under its jurisdiction. As of November 1978, these four electric utilities had put the master metering standard into effect, and the Louisiana PSC had made a determination to adopt the advertising standard for the electric and

gas utilities. Automatic adjustment clauses, as defined by PURPA, were not allowed by the PSC; instead, monthly hearings must be held to determine fuel cost adjustments. The PSC had begun generic hearings on the information to consumers and termination of service standards and planned to reach a decision in February 1980. Hearings on the ratemaking standards were tentatively scheduled to begin by November 9, 1980.

The City of New Orleans regulates one gas and two electric utilities that operate within the city. The city planned to reach a decision on all the regulatory standards by November 1980. It planned to begin consideration of the ratemaking standards by November 1980 and to make final determinations by November 1981.

Southwest Louisiana Electric Membership Corporation (SLEMC) is a nonregulated utility in Louisiana that is subject to the PURPA requirements.\* As of November 1978, this cooperative had put into effect all the regulatory standards except the automatic adjustment clauses standard. The cooperative has no control over fuel costs because it does not generate any of its power. After April 1980, it planned to initiate consideration of the ratemaking standards beginning with the cost-of-service standard.

As of June 30, 1979, the master metering standard covered 887,000 electric customers in Louisiana. The 50,000 electric customers of SLEMC were covered by the information to consumers and termination of service standards. None of Louisiana's 1.2 million electric customers were covered by any of the ratemaking standards or by the automatic adjustment clauses standard, and none of Louisiana's 650,000 gas customers were covered by either applicable standard.

#### Maine

The Maine PUC regulates three investor-owned electric companies and no gas companies. In generic hearings that were reported to be in compliance with PURPA procedural requirements, the PUC had made a determination to adopt but no utility had yet put into effect the termination of service and advertising standards. The PUC had decided not to adopt the automatic adjustment clauses standard. The PUC had made a determination to adopt the declining-block rates standard for residential customers of Central Maine Power Company. The PUC had also begun hearings for this utility on time-of-day rates.

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\* The City of Lafayette is also a nonregulated utility in Louisiana that is subject to PURPA requirements. Their report was received March 3, 1980, too late to be included in this report. See Lafayette's comments in Section 4.3.

Generic hearings were scheduled to begin in April 1980 on the cost-of-service standard and in the second half of 1980 on the master metering and information to consumers standards. The other ratemaking standards would be considered as applicable in upcoming rate cases.

The determination to implement the declining-block rates standard without any determination to implement the cost-of-service standard raises questions about the methodology that the PUC planned to use to determine energy and other costs for rate-setting purposes.

As of June 30, 1979, none of Maine's 470,000 electric customers were covered by any PURPA standard.

#### Maryland

The Maryland PSC planned to consider the PURPA standards on a case-by-case basis. Hearings had begun on the first five ratemaking standards for four of Maryland's five electric utilities, and the PSC planned to render a decision sometime in 1981. The PSC believed that it was already in compliance with the intent of the PURPA regulatory standards but nevertheless planned to proceed with the formal consideration process for each standard.

In summary, as of June 30, 1979, none of Maryland's 2.1 million electric customers or 1.0 million gas customers were covered by any of the PURPA standards.

#### Massachusetts

Consideration of the five ratemaking standards had begun for three of the electric utilities regulated by the Massachusetts Department of Public Utilities (DPU). Hearings for the remaining utilities were to begin in February 1980, and by May 1981 the DPU is expected to make a decision for all the utilities. A generic hearing on the load management standard was scheduled to be completed by August 1981; a decision was expected by October 1981.

All the electric and gas utilities under the DPU's jurisdiction had put the termination of service standard into effect through a 1976 regulation that the DPU reported substantially conforms to PURPA. Following completion of a study by independent consultants, it planned to hold generic hearings to consider the advertising, information to consumers, and automatic adjustment clauses standards. A schedule had not yet been established for consideration of the master metering standard.

As of June 30, 1979, all of the 1.9 million electric and 890,000 gas customers in Massachusetts were covered by the termination of service standard, but none were covered by any of the other PURPA standards.

### Michigan

The Michigan PSC regulates seven electric and six gas utilities. Prior to November 1978, two electric utilities had put the master metering standard into effect and three had put the automatic adjustment clauses standard into effect. The PSC planned to conduct generic hearings on the information to consumers, termination of service, and advertising standards and to reach final decisions in November 1980.

Hearings on the ratemaking standards and remaining regulatory standards would be incorporated in future ratemaking proceedings. These hearings were projected to be completed by fall 1981.

As of November 1978, the Lansing Board of Water and Light had put into effect four of the six ratemaking standards: cost-of-service, time-of-day rates, seasonal rates, and load management techniques. The cost-of-service standard covered all of Lansing's 75,000 electric customers, while the other three ratemaking standards covered fewer than 4,000 customers, most of whom were in the residential class. It had also put into effect the termination of service standard for all customers and had considered and rejected a declining-block rates standard. Since November 1978, it had put into effect the master metering standard, with procedures reported to be in compliance with PURPA requirements. However, the standard did not cover any of Lansing's 65,000 residential customers.

Formal hearing dates had not been set for the remaining standards, but the Board expected to reach a decision on them within the time frame established by PURPA.

The cost-of-service standard put into effect by Lansing specified accounting and future cost methodologies and provided for costs to be allocated to major customer groups and for identification of customer, demand, and energy cost components. Time-related cost differentials were not identified, however, and a mixture of own-system and transferred load research data was used.

As of June 30, 1979, 3.0 million of Michigan's 3.9 million electric customers were covered by the master metering and automatic adjustment clauses standards; 75,000 by the cost-of-service and termination of service standards; and none or relatively few by the remaining standards. None of Michigan's 2.4 million gas customers were covered by either applicable PURPA standard.

Minnesota

The Minnesota Department of Public Service (DPS) regulates four electric and nine gas utilities. Several of the electric utilities had put a number of the ratemaking standards into effect prior to November 1978. Northern States Power Company had put all the ratemaking standards into effect except load management techniques. Minnesota Power & Light had put the cost-of-service, declining-block rates, and interruptible rates standards into effect, while the DPS had rejected the time-of-day and seasonal rates standards for this utility.

All the ratemaking standards except cost-of-service had been put into effect by the Otter Tail Power Company, which raises questions about the methodologies used to determine costs both for rate design purposes as required by all five ratemaking standards put into effect and also for the cost/benefit analyses as required by the time-of-day rates and load management techniques standards.

Finally, none of the ratemaking standards had been considered for the Interstate Power Company; accordingly, the department planned to consider all the ratemaking standards in its next rate hearing.

Before November 1978, the automatic adjustment clauses and information to consumers standards had been put into effect, and a state statute that prohibited the recovery of advertising costs from consumers had been enacted for all the electric utilities and for one of the gas utilities, Minnesota Gas. After November 1978, rulemaking procedures had begun for the termination of service standard for both gas and electric utilities. In addition, the department planned to review the automatic adjustment clauses and information to consumers standards in generic hearings, which would also deal with the master metering standard.\*

In implementing the cost-of-service standard for two utilities, the DPS prescribed both accounting cost and marginal cost methodologies and required allocation of costs to major customer groups and identification of customer, demand, and energy cost components. A mixture of own-system and transferred load research data was used by the two utilities. The DPS did not require identification of time-related cost differentials, which raises questions about the methodologies used to identify costs for the time-of-day and seasonal rates standards put into effect by Northern States Power.

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\* In its comments on the draft summary (see Section 4.3), the DPS reported another statute under which the state's energy agency has put into effect rules prohibiting master metering in multiple dwelling units.

Peoples Natural Gas Division of Northern Natural Gas, which was included in the DPS report, also reported as a nonregulated gas utility because a portion of its Minnesota operations is nonregulated. Peoples reported planning to adopt the same standards for its nonregulated operations as those established for its regulated operations by the DPS.

In conclusion, the automatic adjustment clauses, information to consumers, and advertising standards covered all of Minnesota's 1.0 million electric customers; the advertising standard also covered about 52 percent of Minnesota's 710,000 gas customers. The first five PURPA ratemaking standards covered between 87 and 96 percent of the electric customers, while the load management techniques standard covered about 5 percent. No customers were covered by the termination of service standard.

#### Mississippi

The Mississippi PSC had filed suit in federal court to test the constitutionality of PURPA; consequently, it did not file a report.

The Southern Pine Electric Power Association expected to begin its review of the ratemaking standards in April 1980; it had already begun consideration of the regulatory standards. The Singing River Electric Power Association had put into effect the five regulatory standards and planned to study the ratemaking standards during FY1980; a schedule had not yet been established.

The regulatory standards put into effect by Singing River covered 49 percent of the 70,000 customers of the two nonregulated electric utilities in Mississippi.

#### Missouri

For seven of the nine electric utilities covered by PURPA, the Missouri PSC had docketed utility-specific cases to consider all the ratemaking standards except load management techniques. The PSC indicated in its annual PURPA report to DOE that it had entertained a motion from the other two electric utilities for exemption from the PURPA requirements (excluding the load management techniques standard) based on the provisions of Section 124 of PURPA. A generic hearing for all nine electric utilities was planned to consider the load management techniques standard.

The PSC had scheduled generic hearings in 1980 for the nine electric utilities to consider four of the five regulatory standards. Automatic adjustment clauses had been banned by the Missouri State

Supreme Court for all residential and small commercial customers since 1979. The PUC planned to hold generic hearings for the gas companies on the advertising and termination of service standards in 1980. It planned to complete hearings on the regulatory standards during 1980 and on the ratemaking standards by 1981.

The Independence Power & Light Department had instituted a seasonal rates policy in 1963 covering residential customers only; it had also put into effect the advertising standard prior to November 1978 covering all customers. The Department and Missouri's other nonregulated utility, Springfield City Utilities, planned to complete consideration of the five regulatory standards in late 1980. Both reported that they would begin consideration of the ratemaking standards in 1981.

In conclusion, about 3 percent of Missouri's 1.5 million electric customers were covered by the seasonal rates and advertising standards, while none were covered by the remaining nine standards as of June 30, 1979. None of Missouri's 580,000 gas customers were covered by either applicable standard.

#### Montana

The Montana PSC had not yet begun consideration of any of the PURPA standards for the five electric utilities and two gas utilities under its jurisdiction. The PSC planned to consider the ratemaking standards in the course of reviewing specific utility rate cases. The first utility-specific rate case was scheduled to begin in January 1980. Hearings for the other covered electric utilities were planned for the second and third quarters of 1980. A generic hearing on the regulatory standards was scheduled to begin in May 1980.

In short, as of June 30, 1979, none of Montana's 260,000 electric customers or its 160,000 gas customers were covered by any of the PURPA standards.

#### Nebraska

No state commission regulates the utilities operating in Nebraska. Three publicly owned electric utilities and six gas utilities filed PURPA reports.

All three electric utilities planned to reach a decision on implementation of the PURPA standards during 1980. The Nebraska Public Power District had already held hearings on all the standards, while the Lincoln Electric System and Omaha Public Power District planned to hold hearings in 1980 and to reach a decision shortly thereafter.

Four of the gas utilities operating in Nebraska had put the advertising standard into effect. The Nebraska legislature had mandated policies regarding termination of service, which it believed to be essentially in compliance with PURPA, and all the reporting gas companies in Nebraska indicated that they were complying with the statute. However, two reported that they had put this standard into effect, two others reported having made a determination to adopt the standard, and another two reported that the consideration process had been started but not yet completed. The two gas utilities that had not yet made a determination on the advertising standard planned to do so in early 1980.

In conclusion, as of June 30, 1979, the termination of service standard had been put into effect for 43,000 of Nebraska's 390,000 gas customers and the advertising standard for 235,000. None of Nebraska's 390,000 electric customers were covered by any PURPA standard.

#### Nevada

The Nevada PSC had not begun consideration of any of the PURPA standards for the four electric utilities and one gas utility under its authority. The PSC intended to consider the five regulatory standards during summer 1980 and to begin consideration of the six ratemaking standards in August 1980. Generic hearings were planned.

In short, as of June 30, 1979, none of Nevada's 280,000 electric customers or its 95,000 gas customers were covered by any of the PURPA standards.

#### New Hampshire

The New Hampshire PUC has regulatory jurisdiction over one electric and one gas utility. The termination of service standard had been put into effect by both utilities, following consideration procedures reported to meet PURPA requirements. The PUC planned to begin consideration of all the other standards in fall 1979. All discovery processes and data collections were to be completed by April 1980. The PUC planned to close hearings by August 1980 and deliver opinions on all the standards by the end of October 1980.

In conclusion, as of June 30, 1979, all of New Hampshire's 280,000 electric customers and 9,000 gas customers were covered by the termination of service standard. None were covered by any of the other PURPA standards.

New Jersey

The Board of Public Utilities of the New Jersey Department of Energy had not started consideration of any of the PURPA standards. It planned to establish a generic procedure for consideration of the standards for the four electric and four gas utilities under its jurisdiction. In successive rate cases, the Board then planned to determine whether it would be appropriate to implement or adopt each standard. No specific time frame had been established.

In short, as of June 30, 1979, none of New Jersey's 2.7 million electric customers or its 1.8 million gas customers were covered by any PURPA standard.

New Mexico

The New Mexico PSC had made a determination to adopt the termination of service, and advertising standards for the six electric and one gas utility under its jurisdiction, and to adopt the information to consumers standard for the electric utilities. None of the utilities had put these standards into effect. The consideration procedures were reported to meet PURPA requirements. The other eight standards were being considered in generic hearings. The PSC had not established a time frame for completion of the hearings nor set a decision date.

In short, as of June 30, 1979, none of New Mexico's 460,000 electric customers or its 280,000 gas customers were covered by any PURPA standards.

New York

The New York PSC regulates seven electric utilities and nine gas utilities, all investor-owned. The PSC reported that it would consider new rate designs for each company on a case-by-case basis and render decisions accordingly.

In its only PURPA determinations since November 1978, the New York PSC had made determinations to implement the cost-of-service and time-of-day rates standards for Consolidated Edison, and the utility had put the cost-of-service standard into effect. Prior to November 1978, two other utilities regulated by the PSC had put the cost-of-service and time-of-day rates standards into effect and four had put the seasonal rates standard into effect. The time-of-day rates standard put into effect, however, covered only commercial and industrial customers.

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In addition, in actions taken prior to November 1978, the PSC reported that the master metering standard had been put into effect by all the electric utilities and the termination of service and advertising standards had been put into effect by all the electric and gas utilities, in accordance with PURPA requirements. However, the master metering standard put into effect covered only residential customers. The advertising standard had been put into effect with respect to political advertising only; but promotional advertising expenditures had been prohibited since 1973 for electric companies and since 1971 for gas companies. The PSC was reviewing the automatic adjustment clauses standard and planned to initiate a rulemaking proceeding on the information to consumers standard in late 1979 or early 1980.

In implementing the cost-of-service standard for three electric utilities, the PSC prescribed accounting cost and marginal cost methodologies for all three and a future cost methodology for two of the three. It required allocation of costs to major customer groups, identification of customer, demand, and energy cost components for all three, and identification of time-related cost differentials for two of the three. All three of the utilities used own-system load research data exclusively.

Implementation of the seasonal rates standard for Orange and Rockland Utilities without implementation of the cost-of-service standard for the same utility raises questions about the quality of the methodology used to determine seasonal differentials in the costs of service.\*

The Power Authority of the State of New York, a nonregulated electric utility covered by PURPA, had not begun consideration of any of the standards, nor had it finalized a plan.

In conclusion, as of June 30, 1979, all of New York's 6.2 million electric customers and 4.0 million gas customers were covered by the termination of service and advertising standards. The master metering standard covered 89 percent of the electric customers; cost-of-service, 61 percent; seasonal rates, 60 percent; and time-of-day rates, 2 percent. None were covered by the remaining three standards.

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\* See New York PSC's comments in Section 4.3.

North Carolina

The North Carolina Utilities Commission (NCUC) had made a determination to implement all the ratemaking standards except time-of-day for the three electric utilities under its jurisdiction. These standards had not yet been put into effect. A generic hearing on the time-of-day standard was scheduled for May 1980.

The NCUC's determinations to implement the cost-of-service, declining block rates, and seasonal rates standards were made prior to November 1978, and determinations to implement the interruptible rates and load management techniques standards were made after this period and before June 30, 1979. The consideration processes for the latter two standards were reported to have been in compliance with PURPA requirements.

A state statute prohibiting the master metering of electric and gas services for any new residential customers was enacted September 1, 1979. In 1975, the North Carolina legislature also banned the use of automatic fuel cost adjustment clauses for electric utilities. Policy on information to consumers was expected to be reviewed during the May 1980 hearing. The NCUC had completed hearings on the termination of service and advertising standards and planned to issue an order in late 1979 or early 1980.

In implementing the cost-of-service standard, the NCUC prescribed accounting and marginal cost methodologies and required: allocation of costs to major customer groups; identification of customer, demand, and energy cost components; and identification of time-related cost differentials. One of the utilities used own-system load research data exclusively; the other two used a mixture of own-system and transferred data.\*

None of the nonregulated municipal utilities in North Carolina had begun the consideration process for any of the standards. Greenville Utilities Commission and Wilson Utilities Department planned to make a determination on the regulatory standards by November 1980 and on the ratemaking standards by November 1981. The Fayetteville Public Works Commission expected to complete consideration of the regulatory standards during 1980 and the ratemaking standards by late 1981.

In short, as of June 30, 1979, none of North Carolina's 1.8 million electric customers or 310,000 gas customers were covered by any of the PURPA standards.

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\* See NCUC's comments in Section 4.3 and discussion of transferred data in Section 2.4.1 (p. 20).

North Dakota

The North Dakota PSC, which regulates three electric and two gas utilities, had begun consideration of all the regulatory standards and expected to reach a decision in March 1980. Consideration of the six ratemaking standards had not yet begun. Separate hearings for each of the covered electric utilities were planned for summer 1981, and a final determination was expected by September 1981.

In short, as of June 30, 1979, none of North Dakota's 180,000 electric customers or 80,000 gas customers were covered by any of the PURPA standards.

Ohio

Since November 1978, the Ohio PUC had made a determination to implement the cost-of-service standard for six of the eight electric utilities under its authority. All other determinations on PURPA standards reported by the Ohio PUC represented actions taken before November 1978. In these actions, the PUC had made determinations to implement the declining-block rates, time-of-day rates, and load management techniques standards for all the regulated electric utilities, and to implement the interruptible rates standard for three. It had made determinations to implement the seasonal rates standard for five of the eight and to reject it for the other three. The PUC reported that it would continue to investigate each standard's specific applicability to individual rate cases.

The automatic adjustment clauses standard had been put into effect by all electric utilities and the advertising standard by all electric and gas utilities. Hearings were scheduled to begin on the remaining regulatory standards in December 1979.

In making a determination to implement the cost-of-service standard, the Ohio PUC required allocation of costs to major customer groups and identification of customer, demand, and energy cost components. It prescribed only an accounting cost methodology and did not require identification of time-related cost differentials. The six utilities used a mixture of own-system and transferred load research data.

Two nonregulated utilities operating in Ohio are subject to PURPA requirements. The South Central Power Company had not yet begun consideration of any of the standards and had not developed a timetable for consideration. In actions taken prior to November 1978, the Cleveland Division of Light & Power had put into effect the time-of-day rates standard for some commercial and industrial customers, the automatic adjustment clauses standard for all customers, and the termination of service standard for residential customers. It had

rejected the advertising standard. Consideration of the other standards had not yet begun, but hearings had been scheduled on the interruptible rates and load management techniques standards.

The Ohio PUC made determinations to implement several other rate-making standards for two utilities for which the cost-of-service standard had not been implemented, and the Cleveland Division of Light & Power put the time-of-day rates standard into effect without implementing the cost-of-service standard. Both actions raise questions about the quality of the methodologies employed to determine costs for rate-setting purposes and for cost/benefit analyses where required.

In conclusion, as of June 30, 1979, over 97 percent of Ohio's 3.8 million electric customers were covered by the automatic adjustment clauses and advertising standards, while only about 1 percent were covered by the termination of service and time-of-day standards. None were covered by the cost-of-service standard or any of the remaining six standards. All of Ohio's 2.6 million gas customers were covered by the advertising standard and none by the termination of service standard.

#### Oklahoma

The Oklahoma Corporation Commission (OCC) planned to review each of the ratemaking standards on a utility-by-utility basis as cases were filed by the four electric utilities under its authority. The Commission also regulates seven gas utilities. The Commission believed that it was in substantial compliance with the declining-block and seasonal rates standards, but it was planning to review those standards in terms of the PURPA requirements regarding cost/benefit and cost-effectiveness.

The Commission was updating rules on information to consumers and termination of service, and planned to adopt these standards after that process. The automatic adjustment clauses and advertising standards had been dictated by legislative action; nonetheless, the Commission planned to consider these statutes with respect to PURPA. Current commission rules on master metering were also scheduled for review and possible update.

Because none of the standards had been put into effect by the utilities as of June 30, 1979, none of Oklahoma's 890,000 electric customers or its 720,000 gas customers were covered by any of the PURPA standards.

### Oregon

The Oregon PUC, which regulates four electric and three gas utilities, had made no PURPA determinations since November 1978. Prior to that time, the cost-of-service, declining-block, master metering, and advertising standards had been put into effect by all covered utilities and the time-of-day and seasonal rates standards by two of Oregon's electric utilities. The time-of-day rates standard, however, covered only a small number of commercial and industrial customers. The PUC planned to hold hearings on all the remaining standards in early 1980. No specific determination date had been set.

In implementing the cost-of-service standard, the PUC prescribed future cost and marginal cost methodologies and did not prescribe an accounting cost methodology. It required allocation of costs to major customer groups and identification of customer, demand, and energy cost components and of time-related cost differentials. The four utilities used both own-system and transferred load research data.

Nonregulated utilities in Oregon include four municipal utilities, one cooperative electric utility, and the Bonneville Power Administration (a federal agency). None of these utilities had made a determination regarding any of the PURPA standards. The Eugene Water & Electric Board had held hearings on all the standards but had not yet made determinations. Central Lincoln PUD had begun consideration and planned to start hearings on the standards in late 1979.

In summary, as of June 30, 1979, all of the customers of Oregon's regulated electric utilities, or about 89 percent of the total 1.0 million electric customers, were covered by the cost-of-service, declining-block rates, master metering, and advertising standards.

Approximately the same number were covered by the seasonal rates standard, only a fraction of 1 percent by the time-of-day standard, and none by any of the five remaining standards. All of the 260,000 gas customers were covered by the advertising standard, and none by the termination of service standard.

### Pennsylvania

To ensure compliance with the requirements of PURPA, the Pennsylvania PUC had decided to review the standards in the course of rate relief cases brought by the eight electric utilities under its jurisdiction. In view of the frequency of rate reviews, the PUC foresaw no problem completing the consideration process within the PURPA time frame, especially since most standards had already been implemented for most utilities. Dates for generic hearings had not been set.

About three-fourths of all the determinations reported by the PUC represented actions taken before November 8, 1978. The cost-of-service standard had been put into effect by six of the eight electric utilities and the declining-block rates, automatic adjustment clauses, information to consumers, and termination of service standards by all eight. The latter two standards cover residential customers only. The time-of-day rates, interruptible rates, and load management techniques standards had been put into effect by seven of the eight, and seasonal rates and master metering by three, with varying levels of coverage. In addition, the termination of service standard had been put into effect by all 10 gas utilities under the PUC's jurisdiction. Only the advertising standard has not been put into effect by any utility.

In implementing the cost-of-service standard for six utilities, the PUC prescribed an accounting cost methodology for all six and a future cost methodology for two. It required allocation of costs to major customer groups and identification of customer, demand, and energy cost components, but it did not require identification of time-related cost differentials. The six utilities used both own-system and transferred load research data.

Four ratemaking standards for one utility and the declining-block rates standard for another had been put into effect without a determination made to implement the cost-of-service standard. These actions raise questions about the quality of the methodologies used to determine costs for ratemaking purposes and for cost/benefit analyses.

The Philadelphia Gas Commission regulates the Philadelphia Gas Works. It planned to complete consideration of the termination of service standard by November 30, 1979, and the advertising standard by November 1980.

In summary, as of June 30, 1979 the cost-of-service standard had been put into effect for 65 percent of Pennsylvania's 4.3 million electric customers. All were covered by the declining-block rates and automatic adjustment clauses standards, 89 percent by the information to consumers and termination of service standards, about half by seasonal rates and load management techniques, and just over one-fourth by time-of-day rates and master metering. The termination of service standard also covered 71 percent of the 2.3 million gas customers. No customers were covered by the advertising standard.

#### Puerto Rico

There is no commission regulating utilities in Puerto Rico.

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The Puerto Rico Electric Power Authority (formerly the Puerto Rico Water Resources Authority) a nonregulated utility supplying electric power to customers in Puerto Rico, had not begun consideration of any of the PURPA standards. Hearings on the ratemaking standards were tentatively scheduled to be held in 1981, with a final decision to be reached by November 1981. The Authority planned to complete all of the activities with respect to the regulatory standards by November 1980.

In brief, as of June 30, 1979, none of Puerto Rico's 950,000 electric customers were covered by any of the PURPA standards. Puerto Rico has no gas utilities covered by PURPA.

#### Rhode Island

The Rhode Island PUC regulates two covered electric utilities and one covered gas utility in the state. Consideration had not yet begun for any of the standards, but the PUC planned to complete the process by October 1981. Commission staff had not yet determined whether to consider some of the standards in generic hearings as opposed to utility-by-utility hearings.

In short, as of June 30, 1979 none of Rhode Island's 340,000 electric customers or 110,000 gas customers were covered by any of the PURPA standards.

#### South Carolina

The South Carolina PSC regulates three electric and four gas utilities. About two-thirds of the PURPA determinations reported by the PSC represented actions taken prior to November 1978. Since 1971, the PSC has required the utilities to use cost-based rates. Over the period from December 1977 through May 1979, the PSC eliminated declining-block rates for all regulated electric utilities. Prior to 1977, two of the three utilities (South Carolina Electric & Gas and Carolina Power & Light) were ordered to place seasonal rates in effect. South Carolina Electric and Gas Co. and Duke Power Co. were ordered in 1978 and 1979, respectively, to offer interruptible rates to industrial customers. In 1977, the PSC held a generic hearing to consider load management and time-of-day rates. As a result of this proceeding, the PSC required electric utilities to file annual load management reports.

In January 1979, the PSC issued an order eliminating the automatic feature of the fuel adjustment clause and providing that fuel components in the rate base can be adjusted only after a public hearing. In January 1975, it ordered that electric utilities could not recover

advertising expenses from consumers. Gas utilities were required to show that any promotional advertising expenses recovered are fully reasonable and demonstrate a relationship between the expenses and benefits that accrue to the company and its customers.

Although the PSC believed that it was in compliance with most of the PURPA standards, it planned to hold hearings to ensure its full compliance. Hearings were scheduled to begin on the regulatory standards in spring 1980, with a determination to be made by the summer. Hearings on the ratemaking standards would begin in early 1980 and continue into spring 1981. These hearings would be held in conjunction with specific company rate cases.

The PSC reported that its determinations to implement the declining-block rates standard for Duke Power Co. and to adopt the automatic adjustment clauses standard for all three electric utilities followed compliance with PURPA procedural requirements, but that its determination to implement the interruptible rates standard for Duke Power Co. omitted many required procedures (see Chapter 2, Exhibit 2.w).

In its determination to implement the cost-of-service standard, the PSC required allocation of costs to major customer groups and identification of customer, demand, and energy cost components. However, it prescribed only the accounting cost methodology and did not require identification of time-related cost differentials. The three utilities used both own-system and transferred load research data.

The South Carolina Public Service Authority is a nonregulated electric utility. It completed hearings on the regulatory standards by September 26, 1979. The authority expected to make a final determination by November 1979. Plans were being developed for holding hearings on the ratemaking standards.

In summary, as of June 30, 1979, 79 percent of South Carolina's 800,000 electric customers were covered by the cost-of-service standard; between 52 and 92 percent by the declining-block rates, seasonal rates, interruptible rates, automatic adjustment clauses, and advertising standards; and none were covered by any of the remaining five standards. None of South Carolina's 210,000 gas customers were covered by either applicable PURPA standard.

#### South Dakota

The South Dakota PUC has regulatory control over six electric and four gas utilities. All determinations reported for the PURPA standards represented actions taken prior to November 1978. The cost-of-service, declining-block rates, and seasonal rates standards

STATE-BY-STATE CONSIDERATION OF PURPA STANDARDS

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had been put into effect by one of the electric utilities, Northwestern Public Service. The information to consumers, termination of service, and advertising standards had been put into effect by all six, and the latter two by the four gas utilities as well. In addition, South Dakota state law required that the PUC accept automatic adjustment clauses for gas and electric utilities.

The first four ratemaking standards were scheduled to be considered in utility-specific hearings in 1980. The PUC planned to hold generic hearings on the load management and interruptible rates standards beginning in July 1980 and expected to complete the consideration process by November 1981.

Hearings on the master metering standard had been completed and a PUC determination was expected shortly after the time the report was filed. Although the information to consumers standard had already been put into effect, the PUC reported in its response to the draft summary that it is considering certain modifications, that hearings may be scheduled in early 1981, and a final determination made in November 1981 (see Section 4.3).

Before the cost-of-service standard was put into effect by Northwestern Public Service, the PUC prescribed both accounting and marginal cost methodologies and required allocation of costs to major customer groups and identification of customer, demand, and energy cost components. However, it did not require identification of time-related cost differentials. The utility used both own-system and transferred load research data.

In conclusion, as of June 30, 1979, all of South Dakota's 160,000 electric customers and 90,000 gas customers were covered by the termination of service and advertising standards. All of the electric customers were also covered by the information to consumers standard, and about one-third by the cost-of-service, declining-block rates, and seasonal rates standards put into effect by Northwestern Public Service. None were covered by any of the remaining three ratemaking standards or by the automatic adjustment clauses standard.

Tennessee

There are three regulatory authorities with jurisdiction in Tennessee: the Tennessee PSC, the Tennessee Valley Authority (TVA), and the City Council of the City of Memphis.

The PSC, which regulates only one electric utility, had not yet begun consideration of any of the PURPA standards. The utility had proposed a rate increase, and the PSC planned to apply PURPA standards during the rate hearing, which was scheduled to begin by March

1980. The PSC also regulates two gas utilities covered by PURPA, and planned to consider the two applicable standards as these gas companies requested rate increases. If either gas utility does not seek a rate change, the PSC reported it would order public hearings to determine conformity no later than November 1980.

TVA is a federal agency with regulatory control over 28 publicly and cooperatively owned electric utilities. Three operate in Alabama, one in Georgia, and the remaining 24 in Kentucky and Tennessee. In March 1979, generic hearings on the five regulatory standards were held in seven locations throughout TVA's jurisdiction. A proposed determination was scheduled to be published in the Federal Register on July 6, 1979, with a final determination to be made in September 1979. Consideration of the ratemaking standards had not yet begun and dates had not yet been set for hearings; TVA procedures called for these dates to be published in the Federal Register as soon as they were set.

The City Council of the City of Memphis regulates Memphis Light, Gas & Water Division with respect to its gas customers. TVA regulates the electric operations. The Council reported, in its response to the draft summary, that public hearings on the two applicable gas standards are scheduled for June 1980, and the city hopes to complete and implement the standards by July 31, 1980 (see Section 4.3).

TVA had also reported as a nonregulated electric utility. The PURPA implementation plan was the same as for the regulatory authority response.

In summary, as of June 30, 1979, none of Tennessee's 1.7 million electric customers or its 340,000 gas customers were covered by any of the PURPA standards.

### Texas

Three regulatory authorities have jurisdiction over utilities in the state of Texas: the Texas Railroad Commission regulates 6 gas utilities, the Texas PUC regulates 14 electric companies, and the City of El Paso regulates 1 electric and 1 gas utility.

The Texas Railroad Commission reported that it planned to begin hearings on a proposed rule regarding termination of service in May 1980, and to issue a final decision by July 1980.\* If approved, the rule would become effective 20 days after adoption. Public hearings on the advertising standards were held on July 17, 1979, and the Commission expected to announce its decision by December 1979.

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\* See comments in response to draft summary in Section 4.3.

STATE-BY-STATE CONSIDERATION OF PURPA STANDARDS

The Texas PUC planned to consider the PURPA ratemaking standards in utility-specific rate cases. All determinations reported for PURPA standards represent actions taken before November 1978. The PUC reported it believed that the generic rate design study completed in 1978 complied with the intent of PURPA. Declining-block rates had been eliminated for all but three electric utilities (those for which a rate hearing had not been completed), and 8 of the state's 14 electric utilities had instituted seasonal rates for their residential customers.

PUC regulations had already prohibited the recovery of political advertising costs, while allowing a utility to recover expenditures for advertising that promotes conservation. The Commission felt that by this action the advertising standard had been adopted for all 14 utilities, and put into effect by them.

State statute prohibited master metering in apartment houses. However, because the law made no mention of commercial establishments, the PUC believed that it was not in complete compliance with the standard. Automatic adjustment clauses were studied as part of the generic rate design study conducted in 1978; the PUC was continuing to study this standard. No hearing dates had been scheduled for any of the regulatory standards.

Because the PUC had not yet made a determination regarding the cost-of-service standard, the putting into effect of the declining-block rates standard by 11 utilities and the seasonal rates standard by 8 utilities raises questions about the quality of the methodologies used to determine costs for ratemaking purposes.

The City of El Paso had not begun consideration of any of the PURPA standards, and had made no final decisions on how to consider them. Their reported practice was to hold PURPA hearings during rate hearings as they are filed.

Only four of the municipalities in Texas had filed PURPA reports; none of them had begun consideration of any of the standards. The cities of Austin, Garland, and Lubbock planned to work together toward complying with the PURPA requirements. Their first step would be to develop a manual outlining procedures for satisfying the PURPA requirements and clarifying and evaluating certain issues for the utilities. None of the cities planned to begin consideration until this manual was completed, which was expected by early 1980. The cities expected to reach final decisions on all standards by 1981.

Dates for hearings on the standards had not been set. The City of San Antonio planned to begin hearings on all standards by May 1980 and to issue its decision on the ratemaking standards by November 1981 and the regulatory standards by mid-October 1980.

In conclusion, as of June 30, 1979, 85 percent of the 4.3 million electric customers in Texas were covered by the advertising standard; 78 percent by the declining-block rates standard; and 56 percent, mostly in the residential class, by the seasonal rates standard. None were covered by the cost-of-service standard or by any of the remaining four ratemaking or four regulatory standards. In addition, none of the 2.9 million gas customers in Texas were covered by either of the applicable standards.

### Utah

In Utah, the PSC had decided to consider the PURPA standards as part of the general rate cases beginning in February 1980 for Utah Power & Light, Moon Lake Electric Association, and CP National Corporation. Since November 1978, a determination had been made to implement the cost-of-service standard for all three electric utilities, but none of the three had put it into effect. The interruptible rates standard had been put into effect for some commercial and industrial customers of Utah Power & Light; and a determination had been made to adopt the advertising standard for the same utility. The consideration process for the cost-of-service standard was reported to be in compliance with PURPA requirements, but the consideration of the interruptible rates standard for Utah Power & Light omitted several required procedures (see Chapter 2, Exhibit 2.w). Hearings on the other ratemaking standards were expected to begin in late 1980.

Other determinations reported for PURPA standards represented actions taken before November 1978. The PSC had instituted a termination of service rule for the three electric utilities and the one gas utility in 1977. By PSC policy, no automatic adjustment clauses were in effect in the state. In addition, the information to consumers standard had been put into effect by Utah Power & Light and the PSC had made a determination to implement the load management techniques standard for the same utility.

In its determination to implement the cost-of-service standard, the PSC required allocation of costs to major customer groups, but it did not prescribe any costing methodology, did not require identification of customer, demand, and energy cost components, and did not require identification of time-related cost differentials. The utilities were not required to provide any own-system or transferred load research data.

Although no formal orders had been issued for the information to consumers standard for the remaining two utilities, the PSC believed that the utilities' practices were in compliance with PURPA requirements. The PSC planned to review all the regulatory standards in utility-specific rate cases beginning in February 1980.

In summary, as of June 30, 1979, all of Utah's 480,000 electric customers were covered by the automatic adjustment clauses and termination of service standards, and all 340,000 gas customers were covered by the latter standard as well. No customers were covered by the cost-of-service standard or any other ratemaking standard except interruptible rates, which covered 2 percent. The information to consumers standard covered 74 percent of the electric customers. No customers were covered by either the master metering standard or the advertising standard.

### Vermont

All implementations of PURPA standards reported by the Vermont Public Service Board (PSB) represented actions taken before November 1978. Cost-of-service, declining-block rates, and time-of-day rates standards had been put into effect by both of the electric utilities under the PSB's jurisdiction. Seasonal rates and the automatic adjustment clauses standards had been put into effect by the Central Vermont Public Service Company. Both utilities had put the termination of service standard into effect for residential customers and the advertising standard into effect for all customers -- a state statute prohibited the recovery of advertising expenses from consumers. The automatic adjustment clauses standard had also been put into effect by Central Vermont Public Service.

In its determination to implement the cost-of-service standard, the PSB prescribed both accounting and marginal cost methodologies, and required: the allocation of costs to major customer groups; identification of customer, demand, and energy cost components; and the use of both own-system and transferred load research data. However, it did not require the identification of time-related cost differentials. The PSB had not decided on a formal timetable for hearings or consideration of the remaining standards.

In short, as of June 30, 1979, all of Vermont's 156,000 customers of electric utilities covered by PURPA were covered by the cost-of-service, declining-block rates, and advertising standards; 88 percent by the termination of service standard; and 62 percent by the seasonal rates and automatic adjustment clauses standards. Less than 1 percent were covered by the time-of-day rates standard, (although a voluntary time-of-day rate was offered to all customers)\* and none by the remaining two ratemaking and two regulatory standards. Vermont had no gas utilities covered by PURPA.

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\* See the third and fifth comments in Vermont PSB's response to draft summary, Section 4.3.

Virginia

The Virginia State Corporation Commission had begun hearings on the ratemaking standards for Virginia Electric Power Co., but had not begun consideration of any of the other standards for the other five electric utilities under its authority. The Commission planned to hold separate hearings for each electric utility on each of the ratemaking standards and to reach a determination by fall 1981.

The Commission also regulates three gas utilities. Generic hearings for each regulatory standard were scheduled for 1980, and a determination scheduled to be made by the end of the year.

The City of Richmond's Department of Public Utilities, a nonregulated gas utility, had put the termination of service and advertising standards into effect prior to the enactment of PURPA and believed that its consideration process complied with the requirements of the act.

As of June 30, 1979, none of Virginia's 2.4 million electric customers were covered by any of the PURPA standards, while about 17 percent of the 390,000 gas customers were covered by the termination of service and advertising standards.

Washington

As of June 30, 1979, the Washington Utilities & Transportation Commission was holding a generic proceeding to consider all the PURPA standards for its three electric utilities. The evidentiary hearing was expected to be concluded in early 1980. Standards for the four gas utilities were to be considered in an ongoing proceeding expected to be concluded in November 1980.

Twelve nonregulated electric utilities operate in the state of Washington. Nine are public utility districts and the remaining three are municipal authorities. The Seattle City Light Department reported putting the master metering standard into effect for its residential customers in an action taken before November 1978. With that one exception, none of the nonregulated utilities had begun consideration of any of the standards. All the utilities, however, expected to be in full compliance by the PURPA deadline. Clark County, Benton County, and the City of Tacoma planned hearings for the latter part of 1979. The other utilities planned to begin hearings sometime in 1980.

In summary, as of June 30, 1979, none of Washington's 1.5 million electric customers or 540,000 gas customers were covered by any of the PURPA standards, except for the customers of the Seattle City

Light Department, which had put the master metering standard into effect for its residential customers. By this action 17 percent of the all electric customers in the state were covered.

#### West Virginia

The West Virginia PSC had held hearings on the termination of service standard for the five electric and four gas utilities under its authority. The PSC planned to consider the ratemaking standards on a utility-by-utility basis as rate cases were filed. If a particular utility had not filed a rate case by July 1, 1980, the PSC planned to initiate a proceeding for that utility.

The PSC planned to consider all the regulatory standards, except the automatic adjustment clauses standard, in rulemaking proceedings scheduled to begin in early 1980 and conclude in fall 1980. The PSC reported that all covered utilities would be subject to these rule-making procedures. The PSC's comments in response to the draft summary note that a state statute prohibits the use of an automatic adjustment clause.

In short, as of June 30, 1979, none of West Virginia's 730,000 electric customers or its 350,000 gas customers were covered by any of the PURPA standards.

#### Wisconsin

The Wisconsin PSC believed that it had substantially complied with requirements of PURPA for the six electric and seven gas utilities under its jurisdiction through actions taken before November 1978 or, in several cases, started before November 1978 and completed since then. The cost-of-service, information to consumers, termination of service, and advertising standards had been put into effect by the six electric utilities and, where applicable, the seven gas utilities. In addition, the PSC had made determinations to implement the declining-block rates and time-of-day rates standards for the six electric utilities. Four had put the declining-block rates standard into effect and four had put the time-of-day rates standard into effect, although the latter standard covered only about 8,000 customers. A determination had been made to implement the load management techniques standard; the interruptible rates standard had been put into effect by four utilities; and the seasonal rates standard had been put into effect by three utilities and rejected for the other three. A final rule with respect to master metering was expected in November 1979.

The ratemaking standards and automatic adjustment clauses standard were to be reviewed on a utility-specific basis. Dockets were pending on interruptible rates for the two utilities that had not put the standard into effect. A date for reviewing the automatic adjustment clauses standard had not been set.

In its determination to implement the cost-of-service standard, the Wisconsin PSC prescribed the use of accounting, future, and marginal cost methodologies and required: allocation of costs to major customer groups; identification of customer, demand, and energy cost components; identification of time-related cost differentials; and use of both own-system and transferred load research data.

In conclusion, as of June 30, 1979, all of Wisconsin's 1.5 million electric customers were covered by the cost-of-service, information to consumers, termination of service, and advertising standards; 93 percent by the declining-block rates standard; 71 percent by the interruptible rates standard, and 0.5 percent by the time-of-day rates standard. None were covered by the remaining four standards.

All of Wisconsin's 920,000 gas customers were covered by the termination of service and advertising standards.

#### Wyoming

The Wyoming PSC planned to hold PURPA hearings on the ratemaking standards concurrent with utility-specific filings for rate increases. All of the four covered electric utilities were expected to file in 1980. The Black Hills Power & Light Company rate case, which was filed on October 28, 1979 was to address the PURPA standards. The PSC also regulates four gas utilities.

Generic rulemaking hearings had been held and final orders and rules promulgated on the master metering, information to consumers, and termination of service standards. The PSC has made a determination to adopt the latter two standards and rejected the master metering standard. Generic public hearings on the advertising and automatic adjustment clauses standards were scheduled for January 1980.

In summary, as of June 30, 1979, none of Wyoming's 110,000 electric customers or its 100,000 gas customers were covered by any of the PURPA standards.

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA

State	Regulatory Authority	Utility Type	Utility	Standard											
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
AL	Alabama PSC	Electric	Alabama Power Co. (I)	0	0	0	0	0	0	0	0	0	0	0	
		Gas	Alabama Gas Co. (I)										0	0	
			Mobile Gas Service (I)										0	0	
	Tennessee Valley Authority	Electric	Decatur Electricity Dept. (P)	0	0	0	0	0	0	3	3	3	3	3	
			Florence Electricity Dept. (P)	0	0	0	0	0	0	3	3	3	3	3	
			Huntsville Utilities (P)	0	0	0	0	0	0	3	3	3	3	3	
		Gas	None												
		Nonregulated	Electric	City of Dothan (P)	0	0	0	0	0	0	0	0	0	0	0
			Gas	None											
	AK	Alaska PUC	Electric	Chugach Electric Assoc. (C)	0	0	0	0	0	0	0	0	0	0	
Gas			Alaska Gas & Service Co. (I)									0	0		
Nonregulated		Electric	None												
		Gas	None												

Status Codes:

0. Consideration process not begun.
1. Hearing scheduled.
2. Consideration process started but hearing not completed.
3. Hearing completed.
4. Official determination made to adopt or implement standard.
5. Official determination made to not adopt or implement standard.
6. Judicial review of determination to adopt or implement standard is pending.
7. Judicial review of determination to not adopt or implement standard is pending.
8. Standard put into effect by utility(ies).
9. Standard put into effect and subsequently discontinued.

- I = Investor-owned
- P = Publicly owned
- C = Cooperative
- F = Federally owned

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURFA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard											
				CCS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
AZ	Arizona Corporation Commission	Electric	Arizona Public Service Co. (I)	2	2	2	2	0	2	2	2	0	2	2	
			Tuscon Electric Power Co. (I)	2	2	2	2	0	2	2	2	0	2	2	
			CP National Corp. (I)	No data submitted											
		Gas	Arizona Public Service Co. (I)											2	2
			Southern Union Gas Co. (I)											2	2
			Southwest Gas Corp. (I)											2	2
	Nonregulated	Electric	Salt River Project Agricultural Improvement & Power District (P)	0	0	0	0	0	0	0	0	0	0	0	0
			Gas	None											
	AR	Arkansas PSC	Electric	Arkansas-Missouri Power Co. (I)	2	0	0	0	0	2	0	0	2	1	0
				Arkansas Power & Light (I)	2	0	0	0	0	2	0	0	2	1	0
Southwestern Power Co. (I)				2	0	0	0	0	2	0	0	2	1	0	
Oklahoma Gas & Electric Co. (I)				2	0	0	0	0	2	0	0	2	1	0	
First Electric Cooperative (C)				2	0	0	0	0	2	0	0	2	1	0	
Gas			Arkansas-Louisiana Gas Co. (I)											1	0
		Arkansas-Oklahoma Gas Co. (I)											1	0	
		Arkansas Western Gas Co. (I)											1	0	
Nonregulated		Electric	None												
			Gas	None											

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard											
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
CA	California PUC	Electric	CP National Corp. (I)	4	4	4	4	4	4	2	0	0	0	8	
			Pacific Gas & Electric Co. (I)	4	4	4	4	4	4	2	0	0	0	8	
			Pacific Power & Light Co. (I)	4	4	4	4	4	4	2	0	0	0	8	
			San Diego Gas & Electric Co. (I)	4	4	4	4	4	4	2	0	0	0	8	
			Sierra Pacific Power Co. (I)	4	4	4	4	4	4	2	0	0	0	8	
			Southern California Edison Co. (I)	4	4	4	4	4	4	2	0	0	0	8	
		Gas	CP National Corp. (I)											0	8
			Pacific Gas & Electric Co. (I)											0	8
			San Diego Gas & Electric Co. (I)											0	8
			Southern California Gas Co. (I)											0	8
			Southwest Gas Corp. (I)											0	8
		Nonregulated	Electric	Anaheim Electric Division (P)	8	8	5	5	5	8	8	8	4	8	8
				Burbank Public Service (P)	2	2	2	2	2	2	2	2	2	2	2
	Glendale Public Service (P)			0	0	0	0	0	0	0	0	0	0	0	
	Imperial Irrigation District (P)			3	3	0	0	0	0	0	0	0	0	0	
	L.A. Dept. of Water & Power (P)			8	8	8	1	1	1	8	8	8	8	8	
	Modesto Irrigation (P)			0	0	0	0	0	0	0	0	0	0	0	
	Palo Alto Electric Utility (P)			0	0	0	0	0	0	0	0	0	0	0	
	Pasadena Water & Power (P)			0	0	0	0	0	0	0	0	0	0	0	
	Riverside Public Utilities (P)			1	1	1	1	1	1	1	1	1	1	1	
Sacramento Municipal Utility (P)	0			0	0	0	0	0	0	0	0	0	0		
Santa Clara Electric Dept. (P)	0			0	0	0	0	0	0	0	0	0	0		
Turlock Irrigation District (P)	0			0	0	0	0	0	0	0	0	0	0		
Vernon Municipal Light Co. (P)	No Report Submitted														
	Gas	Long Beach Gas Department (P)										0	0		

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard											
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
CO	Colorado PUC	Electric	Central Telephone & Utilities (I)	4	4	4	4	4	4	1	0	0	2	0	
			Public Service Co. of Colorado (I)	4	4	4	4	4	4	1	4	0	2	4	
			Colorado Springs Dept. of Public Utilities (P)	4	4	4	4	4	4	1	0	0	2	4	
		Gas	Greeley Gas Co. (I)											2	4
			Iowa Electric Light & Power (I)											2	4
			Kansas-Nebraska Natural Gas (I)											2	0
			Northern Natural Gas Co. (I)											2	4
			Public Service Co. of Colorado (I)											2	4
			Colorado Springs Dept. of Public Utilities (P)											2	4
	Nonregulated	Electric	Western Area Power Administration (F)	0	0	0	0	0	0	0	0	0	0	0	
			Gas	None											
	CT	Connecticut Division of Public Utility Control	Electric	Connecticut Light & Power Co. (I)	2	2	8	2	2	2	3	8	0	2	8
				Hartford Electric Light Co. (I)	2	2	8	2	2	2	3	8	0	2	8
United Illuminated Co. (I)				0	0	8	2	2	2	3	8	0	2	8	
Gas			Connecticut Light & Power Co. (I)											2	8
			Connecticut Natural Gas Corp. (I)											2	8
			Southern Connecticut Gas Co. (I)											2	8
Nonregulated		Electric	None												
			Gas	None											

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard											
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
DE	Delaware PSC	Electric	Delmarva Power & Light Co. (I)	1	1	1	1	1	1	0	0	0	0	0	
		Gas	Delmarva Power & Light Co. (I)									0	0		
	Nonregulated	Electric	None												
		Gas	None												
DC	PSC of the District of Columbia	Electric	Potomac Electric Power Co. (I)	2	2	6	8	0	0	0	0	0	8	2	
		Gas	Washington Gas Light Co. (I)										8	2	
	Nonregulated	Electric	None												
		Gas	None												
FL	Florida PSC	Electric	Florida Power Corp. (I)	0	0	0	0	0	0	0	0	0	0	8	
			Florida Power & Light Co. (I)	0	0	0	0	0	0	0	0	0	0	8	
			Gulf Power Co. (I)	0	0	0	0	0	0	0	0	0	0	8	
			Tampa Electric Co. (I)	0	0	0	0	0	0	0	0	0	0	8	
			Gainesville/Alachua Board (P)	0	0	0	0	0	0						
			Jacksonville Electric Authority (P)	0	2	2	0	0	2						
			Lakeland Dept. of Electricity (P)	0	0	0	0	0	0						
			Orlando Utilities Commission (P)	0	0	0	0	0	0						
			City of Tallahassee (P)	0	0	0	0	0	0						
			Clay Electric Cooperative (C)	0	0	0	0	0	0						
		Lee County Electric Cooperative (C)	0	0	0	0	0	0							
		Gas	City Gas Co. of Florida (I)											0	8
			Florida Gas Co. (I)											0	8
People's Gas System (I)												0	8		

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard													
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS			
FL	Nonregulated	Electric	Gainesville/Alachua Board (P)								0	0	0	0	0		
			Jacksonville Electric Authority (P)								0	0	0	8	0		
			Lakeland Dept. of Electricity (P)									0	0	0	0	0	
			Orlando Utilities Comm. (P)									0	0	0	0	0	
			City of Tallahassee (P)									0	8	0	0	0	
			Clay Electric Cooperative (P)										0	0	0	0	0
			Lee County Electric Cooperative (P)										0	0	0	0	0
		Gas	None														
GA	Georgia PSC	Electric	Georgia Power Co. (I)	0	0	0	0	0	0	0	0	0	0	0	0		
			Savannah Electric & Power (I)	0	0	0	0	0	0	0	0	0	0	0	0	0	
			Gas	Atlanta Gas Light Co. (I)										0	0		
				Chattanooga Gas Co. (I)										0	0		
				Gas Light Co. of Columbus (I)											0	0	
				United Cities Gas Co. (I)											0	0	
		Tennessee Valley Authority	Electric	North Georgia Electric Membership Corp. (C)	0	0	0	0	0	0	3	3	3	3	3		
				Gas	None												
		Nonregulated	Electric	Flint Electric Membership Corp. (C)	1	1	1	1	1	1	1	1	1	1	1		
					Jackson Electric Membership Corp. (C)	0	0	0	0	0	0	0	0	0	0	0	
				Albany Water, Gas & Light Commission (P)	0	0	0	0	0	0	0	0	0	0	0		
				Gas	None												

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard										
				CCS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS
HI	Hawaii PSC	Electric	Hawaiian Electric Co. (I)	3	3	3	3	3	3	0	0	0	0	0
		Gas	None											
	Nonregulated	Electric	None											
		Gas	None											
ID	Idaho PSC	Electric	Idaho Power Co. (I)	0	0	0	0	0	0	0	0	2	2	2
			Pacific Power & Light Co. (I)	0	0	0	0	0	0	0	0	2	2	2
			Utah Power & Light Co. (I)	0	0	0	0	0	0	0	0	2	2	2
			Washington Water Power (I)	0	0	0	0	0	0	0	0	2	2	2
	Gas	Intermountain Gas Co. (I)										2	2	
		Washington Water Power (I)										2	2	
	Nonregulated	Electric	None											
		Gas	None											
IL	Illinois Commerce Commission	Electric	Central Illinois Light Co. (I)	0	0	0	0	0	0	0	0	0	0	0
			Central Illinois Public Service (I)	0	0	0	0	0	0	0	0	0	0	0
			Commonwealth Edison Co. (I)	0	0	0	0	0	0	0	0	0	0	0
			Illinois Power Co. (I)	0	0	0	0	0	0	0	0	0	0	0
			Interstate Power Co. (I)	0	0	0	0	0	0	0	0	0	0	0
			Iowa-Illinois Gas & Electric (I)	0	0	0	0	0	0	0	0	0	0	0
			Union Electric Co. (I)	0	0	0	0	0	0	0	0	0	0	0

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard													
				COS	DBR	TOD	SLR	INI	LMT	MM	AAC	ITC	TOS	ADS			
IL	Illinois Commerce Commission	Gas	Central Illinois Light Co. (I)											0	0		
			Central Illinois Public Service (I)												0	0	
			Illinois Power Co. (I)												0	0	
			Interstate Power Co. (I)												0	0	
			Iowa-Illinois Gas & Electric (I)												0	0	
			North Shore Gas Co. (I)												0	0	
			Northern Illinois Gas Co. (I)												0	0	
			People's Gas, Light & Coke (I)												0	0	
		United Cities Gas Co. (I)												0	0		
			Nonregulated	Electric	Springfield Water Light & Power (P)	0	0	0	0	0	0	0	0	0	0	0	0
		Gas	None														
IN	Indiana PSC	Electric	Indiana & Michigan Electric Co. (I)	0	0	0	0	0	0	1	0	3	3	3			
			Indianapolis Power & Light (I)	0	0	0	0	0	0	1	0	3	3	3			
			Northern Indiana Public Service (I)	0	0	0	0	0	0	1	0	3	3	3			
			Public Service Co. of Indiana (I)	0	0	0	0	0	0	1	0	3	3	3			
			Southern Indiana Gas & Electric (I)	0	0	0	0	0	0	1	0	3	3	3			
			Richmond Power & Light (I)	0	0	0	0	0	0	1	0	3	3	3			
				Gas	Indiana Gas Co. (I)											3	3
			Kokomo Gas & Fuel (I)													3	3
		Northern Indiana Public Service (I)													3	3	
		Southern Indiana Gas & Electric (I)													3	3	
		Terre Haute Gas Corp. (I)													3	3	
		Citizens' Gas & Coke Utility (I)												3	3		
			Nonregulated	Electric	None												
		Gas	None														

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard											
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
IA	Iowa State Commerce Commission	Electric	Iowa Electric Light & Power (I)	0	0	0	0	0	0	8	4	8	8	8	
			Iowa Public Service Co. (I)	0	0	0	0	0	0	8	4	8	8	8	
			Iowa Power & Light Co. (I)	0	0	0	0	0	0	8	4	8	8	8	
			Interstate Power Co. (I)	0	0	0	0	0	0	8	4	8	8	8	
			Iowa-Illinois Gas & Electric (I)	0	0	0	0	0	0	8	4	8	8	8	
			Iowa Southern Utilities Co. (I)	0	0	0	0	0	0	8	4	8	8	8	
			Union Electric Co. (I)	0	0	0	0	0	0	8	4	8	8	8	
		Gas	Interstate Power Co. (I)										8	8	
			Iowa Electric Light & Power (I)										8	8	
			Iowa-Illinois Gas & Electric (I)										8	8	
			Iowa Power & Light Co. (I)										8	8	
			Iowa Public Service Co. (I)										8	8	
			Iowa Southern Utilities Co. (I)										8	8	
			Minnesota Gas Co. (I)										8	8	
			North Central Public Service (I)										8	8	
		Nonregulated	Electric	Muscatine Power & Light (P)	0	0	0	0	0	0	8	0	0	8	0
				Gas	None										
KS	Kansas State Corporation Commission	Electric	Central Telephone & Utilities (I)	2	2	2	2	2	2	2	2	2	2	2	
			Empire District Electric Co. (I)	2	2	2	2	2	2	2	2	2	2	2	
			Kansas City Power & Light Co. (I)	2	2	2	2	2	2	2	2	2	2	2	
			Kansas Gas & Electric Co. (I)	2	2	2	2	2	2	2	2	2	2	2	
			Kansas Power & Light Co. (I)	2	2	2	2	2	2	2	2	2	2	2	
			Southwestern Public Service (I)	2	2	2	2	2	2	2	2	2	2	2	

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PJEPFA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard														
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS				
KS	Kansas State Corporation Commission	Gas	Anadarko Production Co. (I)											2	2			
			Arkansas-Louisiana Gas Co. (I)												2	2		
			Gas Service Co. (I)													2	2	
			Greeley Gas Co. (I)													2	2	
			Kansas-Nebraska Natural Gas (I)													2	2	
			Kansas Power & Light Co. (I)													2	2	
			Northern Natural Gas (I)													2	2	
			Panhandle Eastern Pipeline (I)														2	2
			Union Gas System (I)														2	2
		Nonregulated	Electric	Kansas City Board of Public Utilities (P)	0	0	0	0	0	0	0	0	0	0	0	0		
		Gas	None															
KY	Kentucky ERC	Electric	Kentucky Power Co. (I)	2	2	2	2	2	2	0	8	0	8	3				
			Kentucky Utilities Co. (I)	2	2	2	2	2	2	0	8	0	8	3				
			Louisville Gas & Electric (I)	2	2	2	2	2	2	0	8	0	8	3				
			Union Light, Heat & Power (I)	2	2	2	2	2	2	0	8	0	8	3				
			Green River Electric Corp. (C)	2	2	2	2	2	2	0	8	0	8	3				
			Henderson Union RECC (C)	2	2	2	2	2	2	0	8	0	8	3				
				Gas	Columbia Gas of Kentucky (I)											8	3	
			Equitable Gas Co. (I)													8	3	
			Inland Gas Co. (I)													8	3	
			Louisville Gas & Electric (I)													8	3	
			Union Light, Heat & Power (I)													8	3	
			Western Kentucky Gas Co. (I)													8	3	
				Nonregulated	Electric	None												
			Gas	None														

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard										
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS
LA	Louisiana PSC	Electric	Central Louisiana Electric (I)	0	0	0	0	0	0	8	0	2	2	4
			Louisiana Power & Light (I)	0	0	0	0	0	8	0	2	2	4	
			Southwestern Electric Power (I)	0	0	0	0	0	8	0	2	2	4	
			Gulf State Utilities Co. (I)	0	0	0	0	0	8	0	2	2	4	
			Arkansas Power & Light (I)	No Data Submitted										
		Gas	Arkansas-Louisiana Gas Co. (I)										2	4
		Louisiana Gas Service Co. (I)										2	4	
		Entex, Inc. (I)										2	4	
		City of New Orleans, Department of Public Utilities	Electric	New Orleans Public Service (I)	0	0	0	0	0	0	0	0	0	0
	Louisiana Power & Light Co. (I)			0	0	0	0	0	0	0	0	0	0	
	Gas		New Orleans Public Service (I)										0	0
		Nonregulated	Electric	Southwest Louisiana Electric Membership Corp. (C)	0	0	0	0	0	0	8	0	8	8
Lafayette Utilities System (P)	Report Submitted too Late to be Included*													
		Gas	None											
ME	Maine Public Utilities Commission	Electric	Bangor Hydro-Electric Co. (I)	0	0	0	0	0	0	5	0	4	4	
			Central Maine Power Co. (I)	0	4	2	0	0	0	5	0	4	4	
			Public Service Co. of New Hampshire (I)	0	0	0	0	0	0	5	0	4	4	
		Gas	None											
		Nonregulated	Electric	None										
Gas	None													

\* Lafayette Utilities System's report was received March 3, 1980.

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard											
				CCS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
MD	Maryland PSC	Electric	Baltimore Gas & Electric (I)	2	2	2	2	2	2	0	0	0	0	2	
			Delmarva Power & Light Co. (I)	2	2	2	2	2	2	0	0	0	0	2	
			Potomac Edison Co. (I)	2	2	2	2	2	2	0	0	0	0	2	
			Potomac Electric Power (I)	2	2	2	2	2	2	0	0	0	0	2	
			Southern Maryland Electric (C)	0	0	0	0	0	2	0	0	0	0	2	
	Gas	Baltimore Gas & Electric (I)											0	2	
		Washington Gas Light Co. (I)											0	2	
	Nonregulated	Electric	None												
			Gas	None											
	MA	Massachusetts Department of Public Utilities	Electric	Boston Edison (I)	2	2	2	2	2	0	0	0	0	8	0
Brockton Edison (I)				0	0	0	0	0	0	0	0	0	8	0	
Cambridge Electric Light (I)				0	0	0	0	0	0	0	0	0	8	0	
Fall River Electric Light Co. (I)				0	0	0	0	0	0	0	0	0	8	0	
Massachusetts Electric Co. (I)				2	2	2	2	2	0	0	0	0	8	0	
New Bedford Gas & Edison Light (I)				0	0	0	0	0	0	0	0	0	8	0	
Western Massachusetts Electric (I)				2	2	2	2	2	0	0	0	0	8	0	
Gas				Bay State Gas Co. (I)											8
			Boston Gas Co. (I)											8	0
			Lowell Gas Co. (I)											8	0
			New Bedford Gas & Edison (I)											8	0
			Commonwealth Gas Co. (I)											8	0
Nonregulated			Electric	None											
				Gas	None										

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard											
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
MI	Michigan PSC	Electric	Consumers Power Co. (I)	2	2	2	0	2	3	8	8	0	2	2	
			Detroit Edison Co. (I)	2	2	2	0	2	3	8	8	0	2	2	
			Indiana & Michigan Electric (I)	2	2	2	0	2	3	0	8	0	2	2	
			Lake Superior District Power (I)	2	2	2	0	0	3	0	0	0	2	2	
			Upper Penninsula Power (I)	2	2	2	0	0	3	0	0	0	2	2	
			Wisconsin Electric Power (I)	2	2	2	0	0	3	0	0	0	2	2	
			Wisconsin Public Service (I)	2	2	2	0	0	3	0	0	0	2	2	
		Gas	Consumers Power Co. (I)											2	2
			Michigan Consolidated GAS (I)											2	2
			Michigan Gas Utilities (I)											2	2
	Michigan Power Co. (I)												2	2	
	Southeastern Michigan Gas (I)												2	2	
				Wisconsin Public Service Corp. (I)									2	2	
	Nonregulated		Electric	Lansing Board of Water & Light (P)	8	5	8	8	2	8	8	0	2	8	0
			Gas	None											
MN	Minnesota Department of Public Service	Electric	Northern States Power (I)	8	8	8	8	8	0	0	8	8	3	8	
			Interstate Power Co. (I)	0	0	0	0	0	0	0	8	8	3	8	
			Otter Tail Power Co. (I)	0	8	8	8	8	8	0	8	8	3	8	
			Minnesota Power & Light (I)	8	8	5	9	8	0	0	8	8	3	8	
		Gas	Greeley Gas Co. (I)											3	0
			Inter City Gas Ltd. (I)											3	0
			Interstate Power (I)											3	0
			Iowa Electric Light & Power (I)											3	0
			Minnesota Gas Co. (I)											3	8
			Montana-Dakota Utilities (I)											3	0
			North Central Public Service (I)											3	0
			Northern States Power (I)											3	0

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard													
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS			
MN	Minnesota Department of Public Service	Gas (cont'd)	Peoples Natural Gas Division of Northern Natural Gas (I)											3	0		
		Nonregulated	Electric	None													
		Gas	Peoples Natural Gas Divison of Northern Natural Gas (I)												1	0	
MS	Mississippi PSC	No Report Submitted															
		Nonregulated	Electric	Southern Pine Electric Power Assoc.(C)	0	0	0	0	0	0	3	3	3	3	3	3	
			Gas	Singing River Electric Power Assoc.(C)	0	0	0	0	0	0	8	8	8	8	8	8	
MO	Missouri PSC	Electric	Arkansas-Missouri Power Co. (I)	0	2	0	2	2	0	0	2	2	2	2	0		
			Empire District Electric (I)	0	2	0	2	2	0	0	2	2	2	2	0		
			Kansas City Power & Light (I)	0	2	0	2	2	0	0	2	2	2	2	0		
			Missouri Edison Co. (I)	0	2	0	2	2	0	0	2	2	2	2	0		
			Missouri Power & Light (I)	0	2	0	2	2	0	0	2	2	2	2	0		
			Missouri Public Service (I)	0	2	0	2	2	0	0	2	2	2	2	0		
			Missouri Utilities Co. (I)	0	2	0	2	2	0	0	2	2	2	2	0		
			St. Joseph Light & Power (I)	0	2	0	2	2	0	0	2	2	2	2	0		
		Gas	Union Electric Co. (I)	3	3	3	3	3	0	0	2	2	2	2	0		
		Gas	Gas Service Co. (I)													2	0
			Laclede Gas Co. (I)													2	0
Peoples Natural Gas Division of Northern Natural Gas (I)														2	0		
Missouri Public Service Co.(I)														2	0		

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard												
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS		
MT	Nonregulated	Electric	Independence Power & Light (P)	0	0	0	8	0	0	0	0	0	0	0	8	
			Springfield City Utilities (P)	0	0	0	0	0	0	0	0	0	0	0	0	
		Gas	Springfield City Utilities (P)											0	0	
	Montana PSC	Electric	Black Hills Power & Light (I)	0	0	0	0	0	0	0	0	0	0	0	0	
			Montana-Dakota Utilities (I)	0	0	0	0	0	0	0	0	0	0	0	0	
			Montana Power Co. (I)	0	0	0	0	0	0	0	0	0	0	0	0	
			Pacific Power & Light Co. (I)	0	0	0	0	0	0	0	0	0	0	0	0	
			Washington Water Power (I)	0	0	0	0	0	0	0	0	0	0	0	0	
		Gas	Montana-Dakota Utilities (I)												0	0
			Montana Power Co. (I)												0	0
Nonregulated	Electric	None														
		Gas	None													
NB	None	Electric	None													
			Gas	None												
Nonregulated	Electric	Lincoln Electric System (P)	0	0	0	0	0	0	0	0	0	0	0	0		
		Nebraska Public Power Dist. (P)	3	3	3	3	3	3	3	3	3	3	3	3		
		Omaha Public Power (P)	0	0	0	0	0	0	0	0	0	0	0	0		
	Gas	Iowa Public Service Co. (I)												8	8	
		Kansas-Nebraska Natural Gas (I)												4	8	
		Minnesota Gas Co. (I)												4	8	
		Northwestern Public Service (I)												8	8	
		Peoples Natural Gas Division of Northern Natural Gas (I)												2	0	
		Metropolitan Utility District of Omaha (P)												2	2	
		Gas Service Co (I)												No Report Submitted		
Iowa Electric Light & Power (I)												No Report Submitted				

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard											
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
NV	Nevada PSC	Electric	CP National Corp. (I)	0	0	0	0	0	0	0	0	0	0	0	
			Idaho Power Co. (I)	0	0	0	0	0	0	0	0	0	0		
			Nevada Power Co. (I)	0	0	0	0	0	0	0	0	0	0		
			Sierra Pacific Power Co. (I)	0	0	0	0	0	0	0	0	0	0		
	Gas	Southwest Gas Corp. (I)										0	0		
	Nonregulated	Electric	None												
NH	New Hampshire PUC	Electric	Public Service Co. of New Hampshire (I)	1	1	2	2	0	1	0	1	0	8	2	
			Gas	Bay State Gas Co. (I)										8	2
	Nonregulated	Electric	None												
			Gas	None											
	NJ	New Jersey Department of Energy: Board of Public Utilities	Electric	Atlantic City Electric Co. (I)	0	0	0	0	0	0	0	0	0	0	0
				Jersey Central Power & Light (I)	0	0	0	0	0	0	0	0	0	0	0
Public Service Electric & Gas (I)				0	0	0	0	0	0	0	0	0	0	0	
Rockland Electric Co. (I)				0	0	0	0	0	0	0	0	0	0	0	
Gas		Elizabethtown Gas Co. (I)											0	0	
		New Jersey Natural Gas Co. (I)											0	0	
		Public Service Electric & Gas (I)											0	0	
		South Jersey Gas Co. (I)											0	0	
Nonregulated	Electric	None													
Gas	None														

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard												
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS		
NM	New Mexico PSC	Electric	Community Public Service (I)	2	2	2	2	2	2	2	2	4	4	4		
			El Paso Electric Co. (I)	2	2	2	2	2	2	2	4	4	4			
			New Mexico Electric Service (I)	2	2	2	2	2	2	2	4	4	4			
			Public Service Co. of New Mexico (I)	2	2	2	2	2	2	2	4	4	4			
			Southwestern Public Service (I)	2	2	2	2	2	2	2	4	4	4			
		Gas	Gas Co. of New Mexico (I)										4	4		
		Nonregulated	Electric	None												
			Gas	None												
		NY	New York PSC	Electric	Central Hudson Gas & Electric (I)	8	0	8	8	0	2	8	3	0	8	8
					Consolidated Edison Co. of New York (I)	8	0	4	8	0	2	8	3	0	8	8
Long Island Lighting Co. (I)	8				0	8	8	0	2	8	3	0	8	8		
New York State Electric & Gas (I)	2				1	2	1	0	2	8	3	0	8	8		
Niagara Mohawk Power Corp. (I)	2				1	2	1	1	2	8	3	0	8	8		
Orange & Rockland Utilities (I)	2				1	2	8	1	2	8	3	0	8	8		
Rochester Gas & Electric (I)	2				1	2	1	0	2	8	3	0	8	8		
Gas	Brooklyn Union Gas Co. (I)														8	8
	Columbia Gas of New York (I)														8	8
	Consolidated Edison Co. of New York (I)														8	8
	Long Island Lighting Co. (I)													8	8	
	National Fuel Gas Distribution Corp. (I)													8	8	
	New York State Electric & Gas (I)												8	8		
	Niagara Mohawk Power (I)												8	8		
	Orange & Rockland Utilities (I)												8	8		
	Rochester Gas & Electric (I)										8	8				

Exhibit 4.b Status of Consideration Process for Each Utility Covered by FURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard											
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
NY	Nonregulated	Electric	Power Authority of the State of New York (P)	0	0	0	0	0	0	0	0	0	0	0	0
		Gas	None												
NC	North Carolina Utilities Commission	Electric	Carolina Power & Light Co. (I)	4	4	2	4	4	4	0	0	1	3	3	
			Duke Power Co. (I)	4	4	2	4	4	4	0	0	1	3	3	
			Virginia Electric & Power (I)	4	4	2	4	4	4	0	0	1	3	3	
		Gas	North Carolina Natural Gas (I)										3	3	
			Piedmont Natural Gas Co. (I)										3	3	
			Public Service Co., Inc. (I)										3	3	
	United Cities Gas Co. (I)											3	3		
	Nonregulated	Electric	Fayetteville Public Works Commission (P)	0	0	0	0	0	0	0	0	0	0	0	
			Greenville Utilities Comm. (F)	0	0	0	0	0	0	0	0	0	0	0	
			Wilson Utilities Dept. (P)	0	0	0	0	0	0	0	0	0	0	0	
			Rocky Mount Public Utilities (P)	No Report Submitted											
		Gas	None												
			Electric	Montana-Dakota Utilities (I)	0	0	0	0	0	0	2	2	2	2	2
Northern States Power (I)				0	0	0	0	0	0	2	2	2	2	2	
Otter Tail Power Co. (I)	0	0		0	0	0	0	2	2	2	2	2			
Gas	Montana Dakota Utilities (I)										2	2			
	Northern States Power Co. (I)										2	2			
Nonregulated	Electric	None													
		Gas	None												

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard												
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS		
OH	Ohio PUC	Electric	Cincinnati Gas & Electric (I)	4	4	4	4	3	4	1	8	0	1	8		
			Cleveland Electric Illuminating (I)	0	4	4	4	4	4	1	8	0	1	8		
			Columbus & Southern Ohio Electric Co. (I)	4	4	4	4	4	4	1	8	0	1	8		
			Dayton Power & Light Co. (I)	4	4	4	4	3	4	1	8	0	1	8		
			Monongahela Power Co. (I)	4	4	4*	4	0	4	1	8	0	1	8		
			Ohio Edison (I)	4	4	4*	4	3	4	1	8	0	1	8		
			Ohio Power Co. (I)	0	4	4*	4	4	4	1	8	0	1	8		
			Toledo Edison Co. (I)	4	4	4	4	1	4	1	8	0	1	8		
			Gas	Cincinnati Gas & Electric (I)											1	8
		Columbia Gas of Ohio, Inc. (I)												1	8	
		Dayton Power & Light Co. (I)												1	8	
		East Ohio Gas Co. (I)												1	8	
		National Gas & Oil Co. (I)												1	8	
		West Ohio Gas Co. (I)												1	8	
		Nonregulated	Electric	Cleveland, Division of Light & Power (P)	0	0	8	0	2	2	0	8	0	8	5	
				South Central Power Co. (C)	0	0	0	0	0	0	0	0	0	0	0	
				Gas	None											
		OK	Oklahoma Corp. Commission	Electric	Empire District Electric (I)	0	0	0	0	0	0	3	3	0	0	3
					Oklahoma Gas & Electric (I)	0	0	0	0	0	0	3	3	0	0	3
Public Service Co. of Oklahoma (I)	0				0	0	0	0	0	3	3	0	0	3		
Southwestern Public Service (I)	0				0	0	0	0	0	3	3	0	0	3		

\* Status should be shown as a 5, but the error was discovered too late for revision of exhibits and analysis. The three changes involved would not substantially alter the analysis or conclusions reached in this report.

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard													
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS			
OK	Oklahoma Corp. Commission	Gas	Arkansas-Louisiana Gas (I)											0	3		
			Arkansas-Oklahoma Gas (I)												0	3	
			Gas Service Co. (I)													0	3
			Lone Star Gas (I)													0	3
			Oklahoma Natural Gas (I)													0	3
			Southern Union Gas Co. (I)													0	3
			Union Gas Systems (I)													0	3
	Nonregulated	Electric	None														
				Gas	None												
	OR	Public Utility Commission of Oregon	Electric			CP National Corp. (I)	8	8	0	0	0	0	8	0	0	2	8
Idaho Power Co. (I)				8	8	0	0	0	0	8	0	0	2	8			
Pacific Power Light Co. (I)				8	8	8	8	0	0	8	0	0	2	8			
Portland General Electric (I)				8	8	8	8	0	0	8	0	0	2	8			
Gas			CP National Corp. (I)												2	8	
			Cascade Natural Gas Corp. (I)												2	8	
			Northwest Natural Gas Co. (I)												2	8	
Nonregulated		Electric	Central Lincoln PUD (P)	2	2	2	2	2	2	2	2	2	2	2	2	2	
			Clatskanie PUD (P)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
			Eugene Water & Electric Board (P)	3	3	3	3	3	3	3	3	3	3	3	3	3	3
			Springfield Utilities Board (P)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
			Umatilla Electric Cooperative (C)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
			Bonneville Power Administration (F)	1	1	1	1	1	1	1	0	0	0	0	0	0	0
	Gas	None															

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard												
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS		
PA	Pennsylvania PUC	Electric	Dusquesne Light Co. Gas (I)	8	8	8	8	8	8	8	8	8	8	8	1	
			Metropolitan Edison Co. (I)	8	8	8	8	8	8	8	8	8	8	8	1	
			Pennsylvania Electric Co. (I)	8	8	8	5	8	8	8	8	8	8	8	1	
			Pennsylvania Power Co. (I)	8	8	8	5	8	8	0	8	8	8	8	1	
			Pennsylvania Power & Light (I)	0	8	0	0	0	0	3	8	8	8	8	1	
			Philadelphia Electric Co. (I)	8	8	8	8	8	8	2	8	8	8	8	1	
			UGI-Luzerne Electric Div. (I)	8	8	8	0	8	8	2	8	8	8	8	1	
			West Pennsylvania Power (I)	3	8	8	3	8	8	3	8	8	8	8	1	
			Gas	Carnegie Natural Gas Co. (I)											8	1
				Columbia Gas of Penn., Inc. (I)											8	1
				Equitable Gas Co. (I)											8	1
				National Fuel Gas Distribution (I)											8	1
				North Pennsylvania Gas Co. (I)											8	1
	Pennsylvania Fuel Gas Inc. (I)												8	1		
	Pennsylvania Gas & Water (I)												8	1		
	People's Natural Gas Co. (I)											8	1			
	Philadelphia Electric Co. (I)											8	1			
	T.W. Phillips Gas & Oil (I)											8	1			
	UGI Corp. (I)											8	1			
	Philadelphia Gas Commission	Electric	None													
Gas				Philadelphia Gas Works (P)										3	0	
Nonregulated	Electric	None														
			Gas	None												

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard											
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
PR	None	Electric	None												
		Gas	None												
	Nonregulated	Electric	Fuerto Rico Water Resources Authority (P)	0	0	0	0	0	0	0	0	0	0	0	0
		Gas	None												
RI	Rhode Island PUC	Electric	Blackstone Valley Electric (I) Narragansett Electric (I)	0	0	0	0	0	0	0	0	0	0	0	0
		Gas	Providence Gas Co. (I)											0	0
	Nonregulated	Electric	None												
		Gas	None												
SC	South Carolina PSC	Electric	Carolina Power & Light Co. (I)	8	8	0	8	0	0	0	8	0	0	8	
			Duke Power Co. (I)	8	8	0	0	8	0	0	8	0	0	8	
			South Carolina Electric & Gas (I)	8	8	0	8	8	0	0	8	0	0	8	
		Gas	Carolina Pipeline Co. (I)											0	0
			Piedmont Natural Gas Co. (I)											0	0
			South Carolina Electric & Gas (I)											0	0
		United Cities Gas Co. (I)										0	0		

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard										
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS
SC	Nonregulated	Electric	South Carolina Public Service Authority (P)	0	0	0	0	0	0	2	2	2	2	2
		Gas	None											
SD	South Dakota PUC	Electric	Black Hills Power & Light (I)	0	0	0	0	0	0	3	0	8	8	8
			Iowa Public Service Co. (I)	0	0	0	0	0	0	3	0	8	8	8
			Montana-Dakota Utilities (I)	0	2	2	0	0	0	3	0	8	8	8
			Northern States Power Co. (I)	3	3	2	3	3	3	3	0	8	8	8
			Northwestern Public Service (I)	8	8	2	8	0	0	3	0	8	8	8
			Otter Tail Power Co. (I)	0	0	0	0	0	0	3	0	8	8	8
		Gas	Iowa Public Service Co. (I)										8	8
			Minnesota Gas Co. (I)										8	8
			Montana-Dakota Utilities (I)										8	8
			Northwestern Public Service (I)										8	8
			None											
Nonregulated	Electric	None												
		Gas	None											
TN	Tennessee PSC	Electric	Kingsport Power Co. (I)	0	0	0	0	0	0	0	0	0	0	
			None											
		Gas	Chattanooga Gas Co. (I)										0	0
			Nashville Gas Co. (I)										0	0
United Cities Gas Co. (I)										0	0			

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard													
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS			
TN	Tennessee Valley Authority	Electric	Bristol Electric Co. (P)	0	0	0	0	0	0	0	3	3	3	3	3		
			Chattanooga Electric Power (P)	0	0	0	0	0	0	0	3	3	3	3	3		
			Clarksville Dept of Energy (P)	0	0	0	0	0	0	0	3	3	3	3	3		
			Cleveland Utilities (P)	0	0	0	0	0	0	0	3	3	3	3	3		
			Greenville Light & Power (P)	0	0	0	0	0	0	0	3	3	3	3	3		
			Jackson Utility Division (P)	0	0	0	0	0	0	0	3	3	3	3	3		
			Johnson City Power Board (P)	0	0	0	0	0	0	0	3	3	3	3	3		
			Knoxville Utilities Board (P)	0	0	0	0	0	0	0	3	3	3	3	3		
			Memphis Light, Gas & Water (P)	0	0	0	0	0	0	0	3	3	3	3	3		
			Nashville Electric Service (P)	0	0	0	0	0	0	0	3	3	3	3	3		
			Appalachian Electric Coop. (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Cumberland Electric Membership (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Duck River Electric Membership (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Four County Electric Power Assc. (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Gibson County Electric Membership Corp. (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Meriwether Lewis Electric (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Middle Tennessee Electric Membership Corp. (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Pennyrile Rural Electric Cooperative (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Southwest Tennessee Electric Membership Corp. (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Tri-County Electric Membership (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Upper Cumberland Electric (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Volunteer Electric Coop. (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			Warren Rural Electric Coop. (C)	0	0	0	0	0	0	0	3	3	3	3	3		
			West Kentucky Rural Electric Cooperative (C)	0	0	0	0	0	0	0	3	3	3	3	3		
				Gas		None											

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard														
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS				
	City Council of the City of Memphis	Electric	None															
		Gas	Memphis Light, Gas & Water (P)													1	1	
	Nonregulated	Electric	Tennessee Valley Authority (F)	0	0	0	0	0	0	0	3	3	3	3	3	3		
		Gas	None															
TX	Texas Railroad Commission	Electric	None															
		Gas	Arkansas Louisiana Gas Co. (I)													0	3	
			Entex, Inc. (I)													0	3	
			Lone Star Gas Co. (I)													0	3	
			People's Natural Gas Division of Northern Natural Gas (I)													0	3	
			Pioneer Natural Gas (I)													0	3	
			Southern Union Gas Co. (I)													0	3	
Anadarko Gas Co. (I)																No data submitted		

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard										
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS
Texas	PUC	Electric	Central Power & Light Co. (I)	0	8	2	0	2	0	0	2	0	0	8
			Community Public Service Co. (I)	0	8	2	0	2	0	0	2	0	0	8
			Dallas Power & Light Co. (I)	0	8	2	8	2	0	0	2	0	0	8
			El Paso Electric Co. (I)	0	8	2	8	2	0	0	2	0	0	8
			Gulf States Utilities (I)	0	8	2	8	2	0	0	2	0	0	8
			Houston Lighting & Power (I)	0	8	2	8	2	0	0	2	0	0	8
			Southwestern Electric Power (I)	0	0	2	0	2	0	0	2	0	0	8
			Southwestern Electric Service (I)	0	8	2	8	2	0	0	2	0	0	8
			Southwestern Public Service (I)	0	8	2	8	2	0	0	2	0	0	8
			Texas Electric Service Co. (I)	0	8	2	8	2	0	0	2	0	0	8
			Texas Power & Light Co. (I)	0	8	2	8	2	0	0	2	0	0	8
			West Texas Utilities Co. (I)	0	0	2	0	2	0	0	2	0	0	8
			Lower Colorado River Authority (P)	0	8	2	2	2	0	0	2	0	0	8
			Pedernales Electric Coop. (C)	0	0	2	0	2	0	0	2	0	0	8
		Gas	None											
City of El Paso		Electric	El Paso Electric Co. (in El Paso) (I)	0	0	0	0	0	0	0	0	0	0	
			Gas	Southern Union Gas Co. (I)								0	0	

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard										
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS
TX	Nonregulated	Electric	Austin Electric Drpt. (P)	0	0	0	0	0	0	0	0	0	0	0
			Lubbock Power & Light (P)	0	0	0	0	0	0	0	0	0	0	
			San Antonio Public Service Board (P)	0	0	0	0	0	0	0	0	0	0	
		Gas	Garland Electric Dept. (P)	0	0	0	0	0	0	0	0	0	0	
			Texas Power & Light (in Garland) (I)	0	0	0	0	0	0	0	0	0	0	
			Lone Star Gas (in Garland) (I)									0	0	
			San Antonio Public Service Board (P)									0	0	
UT	Utah PSC	Electric	CP National Corp. (I)	4	0	0	0	0	0	0	8	0	8	0
			Utah Power & Light Co. (I)	4	0	2	2	8	4	2	8	8	8	4
			Moon Lake Electric Assoc. (C)	4	0	0	0	0	0	0	8	0	8	0
	Nonregulated	Gas	Mountain Fuel Supply Co. (I)										8	0
		Electric	None											
VT	Vermont PSB	Electric	Central Vermont Public Service (I)	8	8	8	8	0	0	0	8	0	8	8
			Green Mountain Power Corp. (I)	8	8	8	0	0	0	0	0	0	8	8
	Nonregulated	Gas	None											
		Electric	None											
			Gas	None										

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard										
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS
VA	Virginia State Corporation Commission	Electric	Virginia Electric & Power (I)	1	1	1	1	1	1	0	0	0	0	0
			Appalachian Power Co. (I)	0	0	0	0	0	0	0	0	0	0	0
			Potomac Edison (I)	0	0	0	0	0	0	0	0	0	0	0
			Old Dominion Power Co. (I)	0	0	0	0	0	0	0	0	0	0	0
			Delmarva Power & Light (I)	0	0	0	0	0	0	0	0	0	0	0
			Potomac Electric Power (I)	0	0	0	0	0	0	0	0	0	0	0
	Gas	Columbia Gas of Virginia (I)	0	0	0	0	0	0	0	0	0	0	0	
			Virginia Electric & Power (I)	0	0	0	0	0	0	0	0	0	0	
			Washington Gas Light Co. (I)	0	0	0	0	0	0	0	0	0	0	
	Nonregulated	Electric	None											
Gas		City of Richmond, Department of Public Utilities (P)									8	8		
WA	Washington Utilities & Transportation Commission	Electric	Pacific Power & Light Co. (I)	2	2	2	2	2	2	2	2	2	2	
			Puget Sound Power & Light (I)	2	2	2	2	2	2	2	2	2	2	
			Washington Water Power Co. (I)	2	2	2	2	2	2	2	2	2	2	
	Gas	Cascade Natural Gas Corp. (I)	0	0	0	0	0	0	0	0	0	0	0	
			Northwest Natural Gas Co. (I)	0	0	0	0	0	0	0	0	0	0	
			Washington Natural Gas Co. (I)	0	0	0	0	0	0	0	0	0	0	
			Washington Water Power Co. (I)	0	0	0	0	0	0	0	0	0	0	

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard													
				COS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS			
WA	Nonregulated	Electric	Port Angeles Light & Water Department (P)	0	0	0	0	0	0	0	0	0	0	0	0		
			PUD #1 of Benton County (P)	0	0	0	0	0	0	0	0	0	0	0	0		
			PUD #1 of Chelan County (P)	0	0	0	0	0	0	0	0	0	0	0	0		
			PUD #1 of Clark County (P)	1	1	1	1	1	1	1	1	1	1	1	1		
			PUD #1 of Cowlitz County (P)	0	0	0	0	0	0	0	0	0	0	0	0		
			PUD #1 of Franklin County (P)	0	0	0	0	0	0	0	0	0	0	0	0		
			PUD #1 of Grant County (P)	0	0	0	0	0	0	0	0	0	0	0	0		
			PUD #1 of Grays Harbor County (P)	0	0	0	0	0	0	0	0	0	0	0	0		
			PUD #1 of Lewis County (P)	0	0	0	0	0	0	0	0	0	0	0	0		
			PUD #1 of Snohomish County (P)	0	0	0	0	0	0	0	0	0	0	0	0		
			Seattle City Light Dept. (P)	0	0	0	0	0	0	8	0	0	0	0	0		
			Tacoma Public Utilities (P)	0	0	0	0	0	0	0	0	0	0	0	0		
				Gas	None												
			WV	West Virginia PSC	Electric	Appalachian Power Co. (I)	2	2	2	2	2	2	0	0	0	3	0
						Mononghela Power Co. (I)	0	0	0	0	0	0	0	0	0	3	0
Potomac Edison Co. (I)	0	0				0	0	0	0	0	0	0	3	0			
Virginia Electric & Power (I)	0	0				0	0	0	0	0	0	0	3	0			
Wheeling Electric Co. (I)	0	0				0	0	0	0	0	0	0	3	0			
Gas	Cabot Corp. Utility Div. (I)													3	0		
	Columbia Gas of West Virginia (I)													3	0		
	Consolidated Gas Supply (I)													3	0		
	Equitable Gas Co. (I)													3	0		
	Nonregulated	Electric	None														
		Gas	None														

Exhibit 4.b Status of Consideration Process for Each Utility Covered by PURPA (cont'd)

State	Regulatory Authority	Utility Type	Utility	Standard											
				CCS	DBR	TOD	SLR	INT	LMT	MM	AAC	ITC	TOS	ADS	
WI	Wisconsin PSC	Electric	Lake Superior District Power (I)	8	8	4	5	2	4	2	0	8	8	8	
			Madison Gas & Electric (I)	8	4	8	8	8	4	2	0	8	8	8	
			Northern States Power Co. (I)	8	4	8	5	8	4	2	0	8	8	8	
			Wisconsin Electric Power (I)	3	8	8	8	8	4	2	0	8	8	8	
			Wisconsin Power & Light Co. (I)	3	8	8	5	8	4	2	0	8	8	8	
			Wisconsin Public Service Corp. (I)	3	8	4	8	2	4	2	0	8	8	8	
		Gas	Madison Gas & Electric (I)											8	8
			Northern States Power Co. (I)											8	8
			Wisconsin Fuel & Light Co. (I)											8	8
			Wisconsin Gas Co. (I)											8	8
	Wisconsin Natural Gas Co. (I)												8	8	
	Wisconsin Power & Light (I)												8	8	
	Wisconsin Public Service Corp. (I)												8	8	
	Nonregulated	Electric	None												
			Gas	None											
	WY	Wyoming PSC	Electric	Black Hills Power & Light (I)	0	0	0	0	0	0	5	0	4	4	0
				Montana-Dakota Utilities (I)	0	0	0	0	0	0	5	0	4	4	0
Pacific Power & Light (I)				0	0	0	0	0	0	5	0	4	4	0	
Utah Power & Light Co. (I)				0	0	0	0	0	0	5	0	4	4	0	
Gas		Cheyenne Light, Fuel & Power (I)											4	0	
		Kansas Nebraska Natural Gas (I)											4	0	
		Montana-Dakota Utilities (I)											4	0	
		Mountain Fuel Supply (I)											4	0	
Nonregulated		Electric	None												
			Gas	None											

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#### 4.3 RESPONSES TO DRAFT STATE-BY-STATE SUMMARIES

To verify the state-by-state summaries of progress made as of June 30, 1979, DOE mailed draft copies of these summaries to each of the appropriate state regulatory authorities and nonregulated utilities. As of April 23, 1980, responses had been received from 41 of 55 state regulatory authorities and 56 of 81 nonregulated utilities (see Exhibit 4.c). As indicated in this exhibit, 59 responses included comments on the state-by-state summaries. These comments are reproduced verbatim in the remainder of this section.

As noted previously, the state-by-state summaries in Section 4.2 reflect corrections of any transcription errors noted in these comments. Only the information originally reported on Form ERA-166 is reflected in the exhibits and in analytical descriptions based upon these exhibits (e.g., the status of the consideration process, the numbers of customers covered by standards put into effect, or the characteristics of standards for which determinations had been made to implement or adopt). Time did not permit the submission and analysis of amended or revised reports.

STATE REGULATORY AUTHORITIES AND NONREGULATED UTILITIES  
 PROVIDING RESPONSES TO REVIEW COPIES OF DRAFT STATE-BY-STATE  
 SUMMARIES

State		Responded	
		With Comments	Without Comments
Alabama	Alabama Public Service Commission	X	
Arkansas	Arkansas Public Service Commission		X
Arizona	Arizona Corporation Commission	X	
	Salt River Project	X	
California	California Public Utilities Commission	X	
	Burbank Public Service Dept.	X	
	Glendale Public Service Dept.		X
	Imperial Irrigation District		X
	Los Angeles Dept. of Water and Power	X	
	Modesto Irrigation District		X
	Pasadena Water & Power Dept.		X
	Riverside Public Utilities Dept.		X
	Sacramento Municipal Utility District	X	
Colorado	Western Area Power Administration	X	
Connecticut	Connecticut Division of Public Utility Control	X	
Delaware	Delaware Public Service Commission	X	
Florida	Florida Public Service Commission	X	
	Gainesville Regional Utilities	X	
	City of Lakeland		X
	Lee County Electric Cooperative		X
	Orlando Utilities Commission	X	
	City of Tallahassee	X	
Georgia	Albany Water, Gas & Light Commission		X
	Flint Electric Membership Corp.	X	
	Jackson Electric Membership Corp.		X

STATE REGULATORY AUTHORITIES AND NONREGULATED UTILITIES  
 PROVIDING RESPONSES TO REVIEW COPIES OF DRAFT STATE-BY-STATE  
 SUMMARIES

State		Responded	
		With Comments	Without Comments
Hawaii	Hawaii Public Utilities Commission	X	
Idaho	Idaho Public Utilities Commission	X	
Illinois	Illinois Commerce Commission	X	
Indiana	Public Service Commission of Indiana	X	
Kansas	Kansas City Board of Public Utilities		X
Kentucky	Kentucky Energy Regulatory Commission		X
Louisiana	Louisiana Public Service Commission City of Lafayette	X	X
	City of New Orleans	X	
	Southwest Louisiana Electric Membership Corp.		X
Maine	Maine Public Utilities Commission	X	
Massachusetts	Massachusetts Dept. of Public Utilities		X
Michigan	Lansing Board of Water and Light		X
Minnesota	Minnesota Dept. of Public Service Peoples Natural Gas Div. of Northern Natural Gas	X X	
Mississippi	Singing River Electric Power Assoc. Southern Pine Electric Power Assoc.		X X
Missouri	Missouri Public Service Commission City Utilities of Springfield	X X	
Montana	Montana Public Service Commission	X	

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STATE REGULATORY AUTHORITIES AND NONREGULATED UTILITIES  
 PROVIDING RESPONSES TO REVIEW COPIES OF DRAFT STATE-BY-STATE  
 SUMMARIES

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State		Responded	
		With Comments	Without Comments
Nebraska	Iowa Public Service Company		X
	Kansas-Nebraska Natural Gas Co.		X
	Lincoln Electric System		X
	Nebraska Public Power District	X	
	Northwestern Public Service Co.	X	
	Omaha Public Power District	X	
	Peoples Natural Gas Div. of Northern Natural Gas	X	
New Mexico	New Mexico Public Service Commission	X	
New York	New York Public Service Commission	X	
	Power Authority of the State of New York	X	
North Carolina	Fayetteville Public Works Commission		X
	Greenville Utilities Commission		X
North Dakota	North Dakota Public Service Commission	X	
Ohio	Ohio Public Utilities Commission	X	
Oklahoma	Oklahoma Corporation Commission		X
Oregon	Eugene Water & Electric Board	X	
	Springfield Utility Board	X	
	Central Lincoln Peoples Utility District		X
	Clatskanie Peoples Utility District		X
Pennsylvania	Pennsylvania Public Utility Commission	X	
Puerto Rico	Puerto Rico Electric Power Authority	X	

STATE REGULATORY AUTHORITIES AND NONREGULATED UTILITIES  
 PROVIDING RESPONSES TO REVIEW COPIES OF DRAFT STATE-BY-STATE  
 SUMMARIES

State		Responded	
		With Comments	Without Comments
Rhode Island	Rhode Island Public Utilities Commission	X	
South Carolina	South Carolina Public Service Commission		X
	South Carolina Public Service Authority	X	
South Dakota	South Dakota Public Utilities Commission	X	
Tennessee	City Council of the City of Memphis	X	
	Tennessee Valley Authority (as State Regulatory Authority)		X
	Tennessee Valley Authority (as Nonregulated Utility)		X
Texas	Public Utility Commission of Texas	X	
	Railroad Commission of Texas	X	
	City of Garland		X
	Lubbock Power & Light		X
	City Public Service Board, San Antonio	X	
Vermont	Vermont Public Service Board	X	
Virginia	Virginia State Corporation Commission	X	
	City of Richmond, Dept. of Public Utilities		X

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STATE REGULATORY AUTHORITIES AND NONREGULATED UTILITIES  
 PROVIDING RESPONSES TO REVIEW COPIES OF DRAFT STATE-BY-STATE  
 SUMMARIES

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State		Responded	
		With Comments	Without Comments
Washington	Public Utility District of Chelan County		X
	Public Utility District of Benton County		X
	Public Utility District of Clark County	X	
	Public Utility District of Franklin County		X
	Public Utility District of Grant County	X	
	City of Tacoma, Dept. of Public Utilities	X	
	West Virginia	West Virginia Public Service Commission	X
Wisconsin	Wisconsin Public Service Commission		X
Wyoming	Wyoming Public Service Commission	X	

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

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The Alabama Public Service Commission has completed consideration of the certain standards in section 113 and 303. The proposed rules have been circulated, and comments received. The final rule will likely be published and placed into effect by June, 1980.


The Commission has completed the first phase of the section 111. They are being considered in conjunction with a major rate case of Alabama Power Company. Considerable attention is being given the standards, with several intervenors, plus the Commission staff, taking an active part. A determination respecting these standards is expected in July, 1980.

Hearings for lifeline rates will commence in August or September, 1980, with a decision rendered by November, 1980.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Luther L. Hall 

Title: Executive Director

Organization: Alabama Public Service Commission

Date: April 7, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

RE: Page 4.16, paragraph 1: The Arizona Corporation Commission regulates a total of 18 electric utilities and 11 gas utilities. Of these, 4 electric utilities and 3 gas utilities are covered by PURPA. They are listed as follows: ELECTRIC--Arizona Public Service Company; Tucson Electric Power Company; Citizens Utilities Company; CP National Corporation. GAS--Arizona Public Service Company; Southwest Gas Company; Southern Union Gas Company.

RE: Page 4.16, paragraph 3: The statement is misleading. It should read: "In conclusion, PURPA standards have not yet been considered for Arizona's utilities which serve 840,000 electric customers and 400,000 gas customers." The statement could be interpreted to mean that PURPA does not apply to any of these customers, which is clearly not the case.

RE: Exhibit 4.b "Status of Consideration Process...by State": We must reiterate that the entry of "2" was intended to save any possible grandfathering options for Arizona.

The entry of "No data submitted" for CP National Corporation was due to the uncertain status of CP in terms of inclusion on the list of covered utilities. Citizens Utilities Company was added on December 21, 1979 so that they were not included on the November 9, 1979 annual report form.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: James J. Apperson

Title: PURPA Director

Organization: Arizona Corporation Commission

Date: April 4, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The Salt River Project Agricultural Improvement and Power District is a political subdivision of the State of Arizona and, although not regulated by the Arizona Corporation Commission, is governed by a publicly elected Board of Directors. People who own land, which is entitled to receive water from the Salt River Project, by virtue of that ownership are shareholders and electors of the Salt River Project. There are no shareholders as that term is generally used.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Dale L. Pohlman *Dale L Pohlman*  
Title: Manager, System Planning  
Organization: Salt River Project  
Date: April 8, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Due to the inadequacy of the reporting mechanism and failure to consider the written description included in our Annual PURPA Report to DOE, the many innovative programs of the California Public Utilities Commission (CPUC) are not reflected in this report. Our major programs are summarized below:

1. Lifeline- The CPUC jurisdictional utilities provide inverted seasonal rates for all of their residential customers.
2. Seasonal and Time-of-Day Rates- All CPUC jurisdictional customers over 1,000 kW were on seasonal time-of-day rates by the end of the reporting period. These customers represent 32% of kWh sales. In addition, by June 1980 all customers over 500 kW will be on these rates and the Commission is overseeing experiments to determine whether such rates are cost effective for smaller usage customers.
3. Interruptible Rates- All the major utilities offer interruptible rates. Nine customers with a potential for 1,250 mW of load reduction are under contract.
4. Load Management- Numerous experiments are under way to test the effectiveness and customer acceptance of various load control equipment.
5. Cost of Service- Since 1976, the CPUC has required the filing of marginal cost data in electric utility rate proceedings. Such data, which are used extensively in rate design, distinguish among customer, energy and demand components and are differentiated by time of use.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Jackalyn Pfannenstiel (Smith)  
Title: Senior Economist  
Organization: California Public Utilities Commission  
Date: April 8, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The City of Burbank Public Service Department provided DOE on November 5, 1979 its PURPA Implementation Plans as required by Question 4.0 of Schedule I of ERA Form 166. In our response we provided the scheduled hearing dates for consideration of all the PURPA standards and the estimated personnel hours and cost required for each. To date we have completed hearings and implemented the Cost of Service Standard, the Master Metering Standard, the Information to Consumers Standard, the Advertising Standard, and the Procedures for Termination of Electric Service Standard.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Xavier G. Baldwin  
Title: Senior Electrical Engineer  
Organization: Burbank Public Service Department  
Date: 4-9-80

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The information on the Los Angeles Department of Water and Power (LADWP) on pages 4.19-4.21 and on Exhibit 4.b was correct as of June 30, 1979. During February and March 1980, LADWP held public hearings on the 11 PURPA Standards and Lifeline rates. Opening Briefs from intervenors were submitted on April 7, and we expect our Board to adopt all eleven standards before June 30, 1980.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Dennis B. Whitney

Title: Rate Manager

Organization: Los Angeles Department of Water & Power

Date: April 8, 1980

cc: Judith Davison

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Public hearings were held on October 9 and 11, 1979, and on November 1, 1979. Advertising providing notification of the hearings and standards being considered was placed in local newspapers, and ratepayers received bill enclosures. Three committees were established to ensure independent consumer input: one to represent the interests of residential ratepayers; another to represent the interests of commercial, industrial, and agricultural ratepayers; and one to represent environmental and conservation concerns. The League of Women Voters, Sacramento Metropolitan Chamber of Commerce, and the Environmental Council of Sacramento, respectively, were asked to assist in the formulation and coordination of the three committees. Each committee was funded at District expense and received District staff assistance upon request.

Prior to the hearings, a District staff statement, which described how the PURPA standards would apply to the SMUD system and evaluated the standards in light of available data, was prepared and made available to the committees and the public.

Each committee prepared a written report and presented oral testimony at the hearings. In addition, several individuals made presentations. Copies of verbatim transcripts of the public hearings and written materials submitted were available for public inspection.

The Board of Directors of the Sacramento Municipal Utility District has considered for adoption each of the PURPA standards and lifeline rates. The Board has determined that its consideration of the standards is in accord with the provisions of the Municipal Utility District Act and the Public Utility Regulatory Policies Act of 1978. The standards and lifeline rates have been considered in light of the record developed during the proceedings on the standards. The Board recognizes the importance of and concurs in the purposes of PURPA.

---

We have no comments at this time.

Submitted by: Donald G. Salow

Title: Rate Economist

Organization: Sacramento Municipal Utility District

Date: April 8, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Page 4.22 First Sentence - Insert after the word "hearing" the words "commenced on July 13, 1976 and continuing" so it will read "In a generic hearing commenced on July 13, 1976 and continuing after November 1978 the Colorado -----"

Page 4.23 The first two complete sentences should be deleted and the following inserted "Accounting costs were prescribed for rate design purposes, but marginal costs were to be used to determine the implementation of time-of-use pricing for certain classes of customers. Declining block rates were eliminated and two or three part rates were prescribed where the energy component would be uniform for all customer classes."

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: *Harry A. Galligan, Jr.*  
Harry A. Galligan, Jr.

Title: Executive Secretary

Organization: Colorado Public Utilities Commission

Date: April 17, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The paragraph regarding the Western Area Power Administration on page 4.23 should be replaced by the following:


The Western Area Power Administration (Western), a Federal agency, has rate-setting responsibility for power marketed and/or transmitted by 11 Federal projects, each with its own rates. For those two or three projects for which PURPA standards apply (one is marginal), the consideration process will begin with the next rate adjustment proceedings. The customers, even as ultimate consumers, are primarily State, Federal, or incorporated public entities (municipalities and cooperatives) purchasing at wholesale rates. Also, Western's rate adjustment procedures for the projects provide for extensive customer and public participation.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Thomas L. Weaver



Title: Assistant Administrator for Power Management and O&M

Organization: Western Area Power Administration

Date: 4/7/80

CT Connecticut Division of Public Utility  
Control

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Page	Paragraph	Line	
4.24	1	2	Delete the word "effectively."

(Comment: word "effectively" is not consistent with concerns expressed in paragraph 3 page 4.24)

Page	Paragraph	Line	
4.24	3	2,3	Delete "...raises questions about the methodology employed by the DPUC to identify..." Replace this phrase with "... does not permit optimum...."

Page	Paragraph	Line	
4.24	3	4	Insert ... better ... between word "to" and the word "determine." Phrase should read ... and to <u>better</u> determine the ...

(Comment: DPUC could not respond to cost of service standard so soon after Legislation was enacted but we felt it important to implement Time of Day Standard based on pre-National Energy Act studies and considerations).

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Charles T. Caprino *Charles T. Caprino*  
Title: Director, Rate Analysis & Research  
Organization: Division of Public Utility Control  
Date: April 1, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

By prior actions of the General Assembly, Delaware Public Service Commission's 170,000 electric and 70,000 gas customers were covered by many of the PURPA Standards long before PURPA was enacted.

As of April 1, 1980, hearings on ratemaking standards are in progress and hearings on regulatory standards, both gas and electric, have been concluded.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Robert J. Kennedy, III

Title: Executive Director

Organization: Delaware Public Service Commission

Date: April 7, 1980

Mr. Howard Perry  
 Director of Regulatory Assistance  
 Office of Utility Systems  
 Department of Energy  
 2000 M Street, N.W., (Room 4014)  
 Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The PSC has implemented the advertising standard for its covered electric and gas utilities. The PSC Report, due to a reporting error on page 137 (Form 166) which failed to include the electric customers effected, did not show the total customers subject to the standard. The advertising standard effects 3.1 million electric and 230,000 gas customers (3.3 total). The summary of this report, pages 4.28 and 4.29, should be changed to note the corrected customer totals. In addition for clarity, page 4.29, paragraph 1, should conclude "with the exception of Automatic Adjustment Clauses and Advertising Standards."

On Exhibit 4.b, Jacksonville Electric Authority shows consideration has started for DBR, TOD, and LMT Standards. This is incorrect and as the PSC reported, no consideration has begun, as of June 30, 1979.

The Florida PSC has considered and adopted the DBR standard in March 1980 and the TOD standard in April 1980.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Michael E. Horne  
 Title: Rate Analyst  
 Organization: FPSC, Tallahassee, Florida 32301  
 Date: April 9, 1980

Mr. Howard Perry  
 Director of Regulatory Assistance  
 Office of Utility Systems  
 Department of Energy  
 2000 M Street, N.W., (Room 4014)  
 Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The statement which appears as paragraph 1 of the 1980 Annual Report to Congress, State of Florida, page 4.28 is inaccurate for the reason that section 366.04(2)(b), Florida Statutes, gives to the Florida PSC the power to "prescribe a rate structure" for municipal or cooperative electric utilities. It does not give the Commission the power to regulate other ratemaking policies of such utilities. Thus, the Florida Public Service Commission is the regulatory body for these utilities only to the extent that rate structure matters are involved.

END OF COMMENT SECTION

We have no comments at this time.

Submitted by: James E. Ford  
 Title: Senior Utilities Engineer  
 Organization: Gainesville Regional Utilities  
 Date: April 9, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The first paragraph on page 4.28 should be modified to explain the Florida PSC jurisdiction. A suggested new paragraph is attached as Item 1.

The first sentence of the first paragraph on page 4.29 should be changed for the same reason. A suggested new sentence is attached as Item 2.

The first sentence of the second paragraph on page 4.29 should also be changed. The suggested changes are attached as Item 3.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Gerald F. Erickson  
Title: Asst. Director, System Planning Division  
Organization: Orlando Utilities Commission  
Date: 4/2/80

### Item 1

In Florida, PURPA covers four investor owned electric utilities, three investor owned gas utilities, five municipal electric utilities, and two cooperative electric utilities. The Florida PSC has complete jurisdiction over the investor owned utilities, but has jurisdiction over the municipal and cooperative electric utilities with respect to rate structure only. The municipal and cooperative electric utilities covered by PURPA have agreed to become a party to the consideration and determination process to be carried out by the Florida PSC with regard to the ratemaking standards covered in Sections 111(d) and 11~~2~~<sup>5</sup>.

### Item 2

In brief, at the time of this report, none of the 3.7 million customers of the 11 electric utilities were covered by any of the proposed ratemaking standards.

### Item 3

Five municipal and two cooperative electric utilities in the state are autonomous with respect to the policy standards identified in Section 113(b).

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Since the submission of our ERA Form 166 to DOE following progress has been made:

1. City of Tallahassee has hired a consultant to help with compliance procedures of PURPA standards.
2. The City at present is conducting an Appliance Saturation Survey which is the prelude to consideration of Load Management Techniques.
3. Florida PSC has taken a definite step to abolish Declining Block Rates. This will affect the City's rates as well.
4. Florida Non-regulated utilities are considering a joint load research for Cost of Service data Collection — this should minimize cost for each utility.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: A. K. (BEN) SHARMA  
Title: System Planning Engineer  
Organization: City of Tallahassee  
Date: April 3, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The Flint Electric Membership Corporation has held the hearings on all standards. The revised standards have been approved by the Board of Directors and are now ready for submission to DOE.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Harold B. Smith  
Title: General Manager  
Organization: Flint Electric Membership Corporation  
Date: April 2, 1980

FOR RECORD PURPOSES ONLY

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

As indicated in our telecon with your office, Hawaii's report will be too late for submission to Congress. However, Hawaii does concur with the portion relating to Hawaii.

We should point out as a progress report that a decision and order (No. 6034) in Docket No. 2793 (Generic Rate structure) was issued on January 11, 1980. Utilities are now responding to proposed changes in their rate schedules and further hearings on each individual utility's proposal will be held in the future.

Commission also opened dockets on Lifeline (Docket No. 3874) and PURPA Standards (Docket No. 3875) with further hearings scheduled on the subjects. Commission will also open docket in near future (hopefully by end of April 1980) on Co-generation and Small Power Production Rules (Section 210).

A copy of the Commission's Decision and Order No. 6034, Docket 2793 (Generic Rate structure) was furnished to the Department of Energy inasmuch as the DOE was a party to the proceeding.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Melvin S. Ishihara  
Title: Administrative Director  
Organization: Hawaii Public Utilities Commission  
Date: April 7, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

/xxx/ We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Change 4.33 as submitted to read:

Hearings are underway on the termination of service, and advertising standards for the five regulated investor-owned electric and gas utilities in Idaho and on the information to consumers standard for the state's three regulated investor-owned electric utilities. The Idaho PUC has issued an Order scheduling proceedings on the remaining regulatory standards for the spring of 1980 and on the rate-making standards for the summer of 1980.

To date, none of the 330,000 electric customers or 110,000 gas customers in Idaho are covered by any of the PURPA standards.

END OF COMMENT SECTION

---

/ / We have no comments at this time.

Submitted by: William F. Winiger  
Title: Executive Assistant  
Organization: Idaho Public Utilities Commission  
Date: April 4, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

COMMENTS ATTACHED

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Charles E. Teclaw  
Acting Manager  
Title: Policy Analysis and Research Division  
Organization: Illinois Commerce Commission  
Date: April 8, 1980

Over the last decade the Illinois Commerce Commission, on its own initiative, has considered all of the Section 111 and Section 113 standards of PURPA although these were not specifically identified as PURPA considerations. As of June, 1979 the Illinois Commerce Commission had not only considered but implemented standards covering the elimination of declining block rates, load management techniques, termination of service, information to consumers, advertising, master metering and automatic adjustment clauses.

The implementation of PURPA as mandated by Congress was viewed by the Commission as an opportunity to continue to improve the regulatory system and to review the suitability of the many standards implemented in Illinois since 1972. Although the Commission believed that in most aspects Illinois was already meeting the objectives of PURPA, it determined that it was in the public interest to hold further hearings on the specific PURPA standards to obtain new data and to solicit public comment.

Although, as of June 30, 1979, the Illinois Commerce Commission had not formally considered the PURPA standards as PURPA Standards, each of the Section 111 and Section 113 standards had been implemented in full or in part in Illinois.

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Because the Commission's existing rules on termination of service, customer information, and advertising were subsequently found in substantial compliance with their PURPA counterparts, it can be said, retrospectively, that Indiana ratepayers were covered before June 30, 1979.

Consideration of electric utility rate-design standards will begin in June, 1980.

Indiana has approximately 1.3 million gas customers.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: William D. Boyd  
Title: Administrative Assistant  
Organization: Public Service Commission of Indiana  
Date: April 7, 1980.

IA Iowa State Commerce Commission

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

4.36 Change - See Attached Sheet

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: John E. Hensel

Title: Executive Secretary

Organization: Iowa State Commerce Commission

Date: April 8, 1980

4.36

Paragraph #1 should be corrected to:

The Iowa State Commerce Commission plans to begin consideration of the ratemaking standards by November 9, 1980, and to make a determination by November 1981. The Commission has implemented or adopted all the regulatory standards for the seven electric and nine gas utilities under its jurisdiction. As of November 1978, the Commission had effectively implemented the master metering, information to consumer, and advertising standards. The automatic adjustment clause standard was adopted on October 4, 1978 by the Commission and all utilities ordered to modify tariffs by January 1, 1980, if necessary, to effect such compliance. Since November 1978, it has implemented the remaining regulatory standard, termination of service. The Commission reports compliance with procedural requirements of PURPA.

Paragraph #2, no corrections.

Paragraph #3 should be corrected to:

Iowa has 1,226,476 electric customers, of which 882,375 are covered by PURPA, and 720,974 gas customers, of which 683,169 are covered by PURPA. All of Iowa's customers covered by PURPA will be covered by all the standards. Currently, these customers are covered by the PURPA standards on master metering, information to customers, termination of service, and advertising standards. The automatic adjustment clause standard effective date is January 1, 1980.

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Muscatine Power and Water has determined that its series of PURPA hearings cannot be completed as previously estimated. It is anticipated that Muscatine Power and Water will commence its hearing on ratemaking standards after the first of October, 1980 and have determinations made in time to comply with Section 112(b)(2) of PURPA.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Steven J. Pershing

Title: Rate Engineer

Organization: Muscatine Power and Water

Date: April 7, 1980

LA City of New Orleans

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The City of New Orleans regulates one gas and two electric utilities that operate within the city. The city plans to reach a decision on all the regulatory standards and lifeline rates by November 9, 1980. It will begin consideration and analysis of the ratemaking standards by November 9, 1980 and make a final determination by November 9, 1981.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: JOSEPH E. WOMBLE  
Title: DIRECTOR  
Organization: DEPARTMENT OF UTILITIES  
Date: 3 APRIL 80

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The City of Lafayette is preparing to hold its first public hearing to serve as an evidential hearing as called for under the provisions of 16 USCA § 2601 et. seq. during the month of April, 1980 or May, 1980.

The City of Lafayette is also a non-regulated utility in Louisiana that is subject to PURPA requirements.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: S. J. Richard  
Title: Director of Utilities  
Organization: City of Lafayette, Louisiana  
Date: April 9, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Maine has implemented the termination of service and advertising standards as of June 29, 1979 and July 16, 1979 respectively.

As indicated to D.O.E. staff, Maine does not have an "automatic" fuel adjustment clause. A new fuel adjustment clause regulation has recently been promulgated which requires a hearing process before any fuel charge can be changed.

The Maine P.U.C. has since 1972 required Cost of Service Studies to be submitted with rate requests. However in connection with PURPA it has decided to reevaluate Cost of Service methodologies in hopes to standardize them to some extent. Since CMP Co. and Bangor Hydro have submitted rate cases since the PURPA report was filed, the Cost of Service and other ratemaking standards will be considered in those dockets.

In Nov. of 1978, the Commission prohibited declining block rates for 331,000 of CMP Co. residential customers.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: John G. Peters  
Title: Director of Finance  
Organization: Maine Public Utilities Commission  
Date: 4/7/80

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

- 
- Item 1: Page 4.47 indicates that the Minnesota Department of Public Service regulates ten gas utilities which meet the minimum size requirements of PURPA. This is incorrect. The number should be nine not ten.
- Item 2: Page 4.48 implies that Minnesota has not yet adopted or implemented the master metering standard. This is incorrect. Minnesota Statute 116H.129, Subd. 8, directs the Commissioner of Administration in consultation with the Director of the Energy Agency to promulgate rules which prohibit master metering in multiple dwelling units. Such rules have been promulgated and implemented. Therefore, the Department of Public Service does not have authority concerning master metering but other Minnesota agencies do and have effectively implemented the standard. The language on page 4.49 should also be revised to reflect this fact.
- Item 3: Page 4.49 indicates that Peoples Natural Gas is a nonregulated utility in Minnesota. This is incorrect. The Minnesota Department of Public Service does have regulatory authority over Peoples' retail operations.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Phillip J. Zins

Title: Public Utility Rates Analyst

Organization: Department of Public Service

Date: April 3, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

*Page 4.49 - Minnesota*

Peoples Natural Gas Division of Northern Natural Gas Company reports that a portion of its Minnesota operations are non-regulated. Peoples plans to adopt the same standards for its nonregulated operations as the Minnesota PSC establishes for Peoples regulated operations.

Note: Include Peoples on "Exhibit 4.b - MN - Gas" in the regulated section. Delete from nonregulated section.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: G. L. Stamm

Title: Vice President Administration

Organization: Peoples Natural Gas Division of Northern Natural Gas Company

Date: April 3, 1980

MO Missouri Public Service Commission

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

In Union Electric's rate design Case No. E0-78-163, it was stipulated and agreed to by various parties that the rates established are in conformance with the first five ratemaking standards established in section 111(d) of PURPA, to the extent that such standards are at the present time considered appropriate to carry out the purposes of the Act; and the proceedings herein comply with and satisfy the requirements of sections 111 and 112 of PURPA with respect to such standards. In the subsequent Order, the Missouri Public Service Commission states its opinion that the rates prescribed in the stipulation are in conformance with the first five (5) ratemaking standards established in section 111(d) of PURPA and the proceedings in this case satisfy the requirements of sections 111 and 112 of PURPA in respect to such standards. As a result, about 682,000 more of Missouri's electric customers will be covered by the first five ratemaking standards established in sections 111(d) of PURPA.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Kenneth J. Rademan  
Title: Director of Utilities  
Organization: Missouri Public Service Commission  
Date: April 7, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Page 4.52, Line 8, delete the word "by" and insert the word "in".

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Cathleen F. Meyer

Title: Supervisor of Rates

Organization: City Utilities of Springfield, Mo.

Date: April 3, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

According to your list and our count, there are five, not seven, electric utilities under Public Service Commission jurisdiction.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Judy Curtis  
Title: Chief, Rate Design Bureau  
Organization: Montana Public Service Commission  
Date: April 1, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The Nebraska Public Power District has the following comments regarding Exhibit 4.b:

Under "cost of service" change the "2" to "3".

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Henry Rice

Title: \_\_\_\_\_

Organization: Nebraska Public Power District

Date: \_\_\_\_\_

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The summary appears to be inconsistent with regard to the advertising standard. In one sentence it states that four gas utilities in Nebraska have implemented the standard, while later in the summary it states that the standard has been implemented for none of Nebraska's 390,000 gas customers. As reported on the chart attached to the summary, Northwestern Public Service Company has implemented the advertising standard for all of its 33,500 Nebraska gas customers (8.6% of the 390,000).

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Alan D. Dietrich



Title: Corporate Attorney

Organization: Northwestern Public Service Company

Date: April 7, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

4.2 State-By-State Progress - Nebraska

Omaha Public Power District  
Omaha, Nebraska

All corporate powers of the District are vested in a seven member Board of Directors elected by the ratepayers of the District. The Board of Directors is the rate-setting authority.

The District's rates and policies are established in accordance with State law. State law requires the District's rates to be fair, reasonable, and nondiscriminatory. The District is complying with the State law regarding termination of service. The District has various studies in progress concerning the PURPA standards and the District's hearings on the standards are presently scheduled for July 24th and 25th 1980.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Allen R. Spangler *Allen R. Spangler*

Title: Manager, Cost of Service and Rate Design

Organization: Omaha Public Power District

Date: April 7, 1980

NB Peoples Natural Gas Division  
of Northern Natural Gas

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following <sup>changes</sup>~~comments~~ incorporated ~~verbatim~~ into the final report submitted to Congress.

---

Exhibit 4.b - NB Section - Gas

Delete "Northern Natural Gas (I) No report submitted"

Northern does not supply gas at retail in Nebraska.  
Retail sales are handled through Peoples Natural  
Gas Division of Northern Natural Gas Company which  
is already listed.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: G. L. Stamm

Title: Vice President, Administration

Organization: Peoples Natural Gas Division of Northern Natural Gas Company

Date: April 3, 1980

NM New Mexico Public Service Commission

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: *Robert A. ...*

Title: *Executive Director*

Organization: *NMP S.C.*

Date: *4/9/80*

New Mexico

The New Mexico PSC has adopted <sup>and</sup> but not implemented the information to consumers (electric only), termination of service, and advertising standards for the six electric and one gas utility under its jurisdiction. The consideration procedures met PURPA requirements. The other eight standards are being considered in generic hearings. The PSC has not established a time frame for completion of the hearings or set a decision date.

In short, none of New Mexico's 460,000 electric customers or its 280,000 gas customers are covered by the implementation of any PURPA standards.

see next page - words "4" means  
"official determination made to approve  
or implement standard"

NY New York Public Service Commission

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

By requiring absolute answers where qualification and subtlety are needed, DOE's procrustean bed of a questionnaire made it difficult to convey accurately New York's extensive progress in carrying out the purposes of PURPA. For example, we have already eliminated many declining block rates. But because our criteria for justifying declining block rates differ from those detailed in PURPA, our response showed little progress here even though we had gone far in implementing what we consider to be a better version of this standard. In fact, nearly 64% of New York's residential customers were on flat rates by last June.

Our strict construction of the standards also seems to be responsible for DOE's questioning our development of the O&R seasonal differential. We developed that differential using accepted embedded cost methods. But because we interpreted the cost-of-service standard as requiring marginal cost analysis as well, we had to report our consideration of the cost of service standard for O&R to be at status "2." Using this response to impugn our methodology for deriving the seasonal differential exemplifies the mischief that can result from the use of a simplistic questionnaire to deal with complex subjects. And misconceptions may be compounded by variations among the states in construing the standards.

Finally, we have, of course, made considerable progress since last June in explicitly considering the PURPA standards in their own terms.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Joel A. Linsider

Title: Executive Assistant to Chairman

Organization: Public Service Commission, New York State

Date: April 10, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The following sentence should be added to the paragraph that discusses the Power Authority on page 462:

"However, since filing its report the Authority has hired a consultant who has drafted a PURPA implementation plan which is to be finalized shortly."

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Edward J. Brown

Title: Principal Economist

Organization: POWER AUTHORITY OF THE STATE OF NEW YORK

Date: April 2, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

4.63 Line 18 should read: The Commission has completed hearings on the termination-of-service and advertising standards. On November 14, 1979, the Commission adopted the termination-of-service PURPA standard in an Order issued in Docket M-100, Subs 28 and 61, and an Order of Clarification dated November 20, 1979. An Order regarding the advertising standard will be issued later this year.

4.64 Line 6 should state that three utilities rather than one use own-system load research data. The language following the semicolon should be deleted.

In Exhibit 4.b under North Carolina Nonregulated Electric Utilities, Rocky Mountain should read Rocky Mount Public.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Robert K. Hoge  
Title: Chairman  
Organization: North Carolina Utilities Commission  
Date: April 3, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

xxx We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

It is incorrect and untrue to state that "In short, none of North Dakota's 180,000 electric customers or its 80,000 gas customers are covered by any of the PURPA standards."

The North Dakota Public Service Commission began internal consideration of the Section 113 policy standards shortly after PURPA was enacted. Formal consideration of the Section 113 PURPA standards was initiated in August, 1979, with hearings on each of the policy standards for each utility being completed February 4 - 7, 1980. The North Dakota Public Service Commission intends to adopt, based on the record of the February 4- 7, 1980 hearing record, nearly all of the elements of the Section 113 policy standards prior to November 9, 1980. Furthermore, it should be pointed out that the North Dakota Public Service Commission, before PURPA was even enacted, had in place advertising, termination of service, information to consumer and automatic adjustment clause standards that governed each of the North Dakota utilities. Many of the concepts from our earlier policies were as stringent as those contained in the Section 113 standards.

Similarly, internal consideration of the Section 111 rate reform standards began shortly after PURPA was enacted. Specifically, cost of service studies for each of the covered electric utilities are underway and will be completed prior to separate hearings which are planned for summer of 1981. Final consideration and adoption of the appropriate elements of the Section 111 rate reform standards will be completed by November 9, 1981, as directed by PURPA.

END OF COMMENT SECTION

---

   We have no comments at this time.

Submitted by: Richard A. Elkin  
Title: President  
Organization: North Dakota Public Service Commission  
Date: April 7, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The Ohio PUC has the following comments regarding the matrix:

Under "seasonal rates", for Monongahela, Ohio Edison and Ohio Power, change "4" to "5".

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Alan Pound

Title: \_\_\_\_\_

Organization: Ohio PUC

Date: \_\_\_\_\_

OR Eugene Water & Electric

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, NW (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.



We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

On April 7, 1980, a final determination was issued by the Eugene Water & Electric Board. Based on testimony entered during five days of evidentiary hearings and on recommendations offered by the presiding officer of the hearings, the following PURPA ratemaking standards were adopted in total: Cost of Service, Declining Block Rates, Interruptible Rates, Load Management Techniques, and Master Metering. Portions of the standards dealing with information to Consumers and Termination of Electric Service were adopted, with more appropriate alternative approaches adopted in some cases. Time of Day Rates, Seasonal Rates, Automatic Adjustment Clauses, Advertising, and Lifeline Rates were not adopted by EWEB.

Expenditures for PURPA ratemaking considerations through December, 1979 in terms of staff time, legal fees and court costs is in excess of \$200,000 to EWEB ratepayers.

END OF COMMENT SECTION

---



We have no comments at this time.

Submitted by: Garry R. Kunkel

Title: Manager of Rates

Organization: Eugene Water & Electric Board

OR Springfield Utility Board

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The Springfield Utility Board will conduct PURPA hearings on sections 111(d) and 113(d) beginning May 5, 1980. The hearing on lifeline rates (section 114) will begin after the November 9, 1980 date.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Gale H. Banry

Title: Assistant General Manager

Organization: Springfield Utility Board

Date: April 7, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

D.O.E.'s questioning of quality of costing methodology for ratemaking purposes is myopic regarding the standards which are of a recent nature and rates which have existed for over 30 years. Declining block rates do not decline in energy component costs, only in costs related to demand and customer components. A declining block standard of levelized energy components has been implemented since 1970 for all electric utilities in order to permit the operation of an automatic adjustment clause. Our lone utility whose most recent cost of service study was under PURPA review at the time of the annual report preparation has offered time of day rates, interruptible rates and load management rates to its consumers for over 30 years. The shortcoming of D.O.E. annual reporting and review is self-evident in relation to the historic practices of the Pennsylvania electric utilities.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: C. A. Smetak, Division Chief

Title: Pennsylvania Public Utility Commission

Organization: P. O. Box 3265, Harrisburg, Pa. 17120

Date: April 2, 1980

PR Puerto Rico Electric Power Authority

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

See attached corrected copy.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Elías Orta

*Elías Orta*

Title: Head, Planning & Research Division

Organization: Puerto Rico Electric Power Authority

Date: April 9, 1980

Puerto Rico

There is no commission regulating utilities in Puerto Rico.

The Puerto Rico Electric Power Authority (formerly the Puerto Rico Water Resources Authority) a nonregulated utility supplying electric power to customers in Puerto Rico, has not begun consideration of any of the PURPA standards. Hearings on the ratemaking standards are tentatively scheduled to be held in 1981, with a final decision to be reached by November 1981. The Authority plans to complete all of the activities with respect to the regulatory standards by November 1980.

In brief, none of Puerto Rico's 950,000 electric customers have been considered as required by ~~are covered by any of~~ the PURPA standards. Puerto Rico has no gas utilities covered by PURPA.

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The Rhode Island PUC regulates two covered electric utilities and one covered gas utility in the state. Consideration has not begun for any of the standards, but the PUC plans to complete the process by October 1981. Commission staff have not yet determined which, if any, generic hearings will be held.

Since consideration has not yet begun, it is difficult to determine to what degree state laws and PUC Rules and Regulations comport with PURPA standards. In short, it is difficult to determine how many of Rhode Island's 340,000 electric customers or 110,000 gas customers are covered by specific PURPA revisions.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Tom Chmura

Title: \_\_\_\_\_

Organization: Rhode Island PUC

Date: \_\_\_\_\_

SC South Carolina Public Service  
Commission

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The South Carolina Public Service Authority's Board of Directors made a final determination on all the regulatory standards on December 17, 1979. Preliminary Staff Opinions on the ratemaking standards are presently being reviewed by appropriate staff. Hearings on the ratemaking standards are expected to begin in the summer of 1980.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Ronald T. Nolte

Title: manager, Corporate Forecasting, Rates & Statistics

Organization: South Carolina Public Service Authority

Date: April 3, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

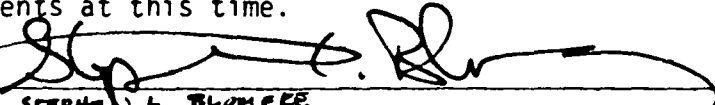
In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

- 
1. on pp. 4.50-4.51, please note the following correction:  
 "Although the information <sup>to consumers</sup> standard has already been implemented, the PUC is considering certain modifications. Hearings may be scheduled in early 1981, and a final determination <sup>made</sup> in November, 1981.
  2. please note correction of "PSC" to "PUC" throughout.

END OF COMMENT SECTION

We have no comments at this time.

Submitted by:   
 Title: Executive Secretary  
 Organization: South Dakota Public Utilities Commission  
 Date: 4/2/80

Attention of Ms. Katherine Van Sickle  
Office Room # 4306

---

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress. Added or corrected items have been encircled in red in the verbatim inserts below.

---

COMMENT 1:

The third full line on page 4.82 is in error as to the name of the Memphis Regulatory Authority. This line should be corrected to read verbatim as follows:

"Authority (TVA), and the (City Council of the) City of Memphis."

COMMENT 2:

The first full paragraph on page 4.83 is in error as to the name of the Memphis Regulatory Authority, and as to the dates of the Sec. 303 Public Hearings. This entire paragraph should be amended to read verbatim as follows:

"(The City Council of) the City of Memphis regulates Memphis Light, Gas & Water Division with respect to its gas customers. TVA regulates the electric operations. Public hearings on the two applicable gas standards (are) scheduled for June (1980), and the City Council (hopes) to complete and implement the standards by July 31, (1980)."

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Joe Evrard

Title: Joe Evrard  
Director of Rates & Statistics

Organization: Memphis Light, Gas & Water Division (Reporting for Memphis City Council)

Date: April 3, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The 111(d) standards are under consideration in the Texas Power and Light rate hearing currently before the Commission. A consultant has been hired to develop guidelines for the cost-benefit analyses required for standards 111(d) 3 and 6. The guidelines will conform to the requirements for the cost of service standard. The methodology is scheduled for completion prior to the November 1, 1980 deadline for filing of the cost of service data required under section 133. The Commission has not yet made a final determination regarding the appropriateness of any of the 111(d) standards.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Paul N. Smolen  
Title: Assistant Director, Economic Research Division  
Organization: PUBLIC UTILITY COMMISSION OF TEXAS  
Date: April 9, 1980

TX Railroad Commission of Texas

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

XX / We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

A public hearing on a proposed rule regarding termination of service was held in February, 1979. A rule regarding advertising expenses was adopted in December, 1979.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Jim B. Cloudt  
Title: Legal Examiner, Gas Utilities Division  
Organization: Railroad Commission of Texas  
Date: April 7, 1980

TX City Public Service Board,  
San Antonio

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The City of San Antonio, in its annual report filed in November 1979 stated that hearings were to be held from May 1980 to July 1980. Subsequently, scheduling changes resulted such that their hearings are to be held in July 1980. Issuance of determinations on the regulatory standards are due by mid-October 1980 and the rate-making standards by November 1981.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Donald S. Thomas 

Title: Manager

Organization: City Public Service Board

Date: P.O. Box 1771 San Antonio, Texas 78296

VT Vermont Public Service Board

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

- 
- p. 4.92 - first line - strike "PBS" and insert "PSB"
  - p. 4.92 - fourth line - insert "covered" before "electric customers"
  - p. 4.92 - fifth line - insert "time of day rates," after "declining-block rates"
  - p. 4.92 - sixth line - strike "88" and insert "100"
  - p. 4.92 - ninth line - strike "are covered" and insert "make use of"

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Eric Stern

Title: Researcher

Organization: Public Service Board

Date: 4/7/80

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

While the PURPA ratemaking and regulatory standards had not been formally considered prior to June 30, 1979, the Virginia State Corporation Commission had considered and implemented prior to that date, policies, procedures and rates, where determined to be appropriate, which address the issues of seasonal and declining block rates, load management, master metering, automatic adjustment clauses, termination of service and advertising. It is believed that under the procedural requirements established in PURPA, it will be determined that existing state policies and standards pertaining to many of these issues substantially, and in some cases completely comply with PURPA standards.

END OF COMMENT SECTION

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We have no comments at this time.

Submitted by: James R. Wittine

Title: Director, Division of Energy Regulation

Organization: Virginia State Corporation Commission

Date: April 9, 1980

h2:1 wd 0

WA City of Tacoma, Department of  
Public Utilities

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Replace the third and fourth sentences of the second paragraph, page 4.94, with the following:

"The Seattle City Light Department and the Light Division of the Tacoma Department of Public Utilities report implementation of the master metering standard for their residential customers in separate actions taken before November 1978. With those two exceptions, none of the nonregulated utilities have begun consideration of any of the standards."

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: James J. Thompson

Title: Superintendent of Light

Organization: City of Tacoma, Dept of Public Utilities, Light Division

Date: April 7, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Public Utility District No. 1 of Clark County held hearings on all eleven PURPA Standards plus lifeline on November 27 and 28, 1979. Formal action not to adopt the lifeline rate standard was taken by the Board of Commissioners on February 19, 1980. Formal action to consider all remaining eleven Standards will be taken in April of 1980.

END OF COMMENT SECTION

---

We have no comments at this time.

Submitted by: Dale R. Merrell  
Title: General Manager  
Organization: Public Utility District No. 1 of Clark County  
Date: 4 April 1980

WA Cowlitz County

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

The annual report to Congress states "In summary, none of Washington's 1.5 million electric customers.....are covered by any of the PURPA standards....."

Public Utility District No. 1 of Cowlitz County, Washington submits that the majority of these customers are served by publicly-owned utilities, and benefit from long-standing utility practice which incorporates the concepts contained in the PURPA standards where appropriate even though the standard has not yet been adopted as a part of official PURPA compliance.

The Board of Commissioners of Public Utility District No. 1 of Cowlitz County, Washington gave Legal Notice of Hearing pursuant to the Public Utility Regulatory Policies Act on March 31, 1980.

Hearings will be held pursuant to Sections 111 and 113 of the Regulatory Act on May 15, 1980.

Hearings will be held pursuant to Section 114 of the Regulatory Act on May 16, 1980.

END OF COMMENT SECTION

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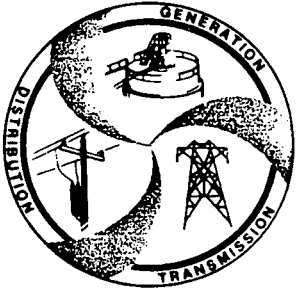
We have no comments at this time.

Submitted by: Robert L. McKinney

Title: General Manager

Organization: Public Utility District No. 1 of Cowlitz County

Date: April 1, 1980



# **PUBLIC UTILITY DISTRICT OF GRANT COUNTY**

P.O. BOX 878 • EPHRATA, WASHINGTON 98823 • 509/754-3541

April 9, 1980

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
U. S. Department of Energy  
2000 M Street Northwest, Room 4014  
Washington, D. C. 20461

Attention: Ms. Tina Van Sickle

Re: Public Utility District No. 2 of Grant County, Washington  
Comment on DOE Report to Congress

Dear Mr. Perry:

We appreciate the courtesy extended and the opportunity to comment on the Department of Energy Report to Congress on PURPA progress of utilities in Washington State.

The first two paragraphs of this report do not elicit comment. However, in my opinion the summary paragraph does not fairly state the ongoing attempts by the non-regulated utilities in the State of Washington to achieve compliance with PURPA. Perhaps a positive approach would be better, such as: "Steps have been taken and progress is being made by both regulated and non-regulated utilities to achieve compliance with PURPA. Public hearings on the rate standards, utility practices and lifeline rates have been held or are scheduled that will be applicable to 1.5 million electric customers and .5 million gas customers."

Grant County PUD has scheduled hearings on PURPA standards for May 1980 and believe that it is in substantial compliance with the spirit of Section 133, dealing with gathering information on costs of service, from which it has requested exemption due to the high costs to achieve marginal benefits therefrom.

In view of reporting deadline requirements, we would appreciate more lead time to meet our obligations.

Sincerely yours,

Douglas F. Burk  
Supervisor, Rates and Statistics

DFB:m1

Telex to 202-254-6461 1:45 p.m.

Mr. Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems  
Department of Energy  
2000 M Street, N.W., (Room 4014)  
Washington, D.C. 20461

Dear Mr. Perry:

In accordance with your letter of March 28, 1980, we have reviewed the relevant draft section of the 1980 Annual PURPA Report to Congress.

We would like the following comments incorporated verbatim into the final report submitted to Congress.

---

Re: W. Va. consideration of PURPA standards. The third paragraph is inaccurate in two respects:

1. The statement "none of West Virginia's 730,000 electric customers or its 250,000 gas customers are covered by any of the PURPA standards." is misleading and incorrect. PURPA standards do not cover anyone. Under PURPA, state commissions are to consider the applicability of those standards to customers in W.Va. At the present time, the W.Va. P.S.C. is considering the termination standard and will undertake considerations of other regulatory standards and §111 ratemaking standards.

2. By statutory mandate §24-2-15, this Commission is prohibited from permitting utilities to use an automatic adjustment clause. Therefore, at least one regulatory standard under PURPA is applicable presently to all electric customers in W. Va.

END OF COMMENT SECTION

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We have no comments at this time.

Submitted by: Robert R. Rodecker

Title: General Counsel

Organization: W. Va. Public Service Commission

Date: April 1, 1980

THE STATE



OF WYOMING

ED HERSCHI  
GOVERNOR

## Public Service Commission

CAPITOL HILL BUILDING

320 W. 25TH STREET

CHEYENNE, WYOMING 82002

C.E. "NED" JOHNSON  
CHAIRMAN  
JOHN R. SMYTH  
DEPUTY CHAIRMAN  
G. KEITH OSBORN  
COMMISSIONER  
ALEX J. ELIOPULOS  
CHIEF COUNSEL AND  
ADMINISTRATIVE SECRETARY

FRANK L. RAUCHFUSS  
DIRECTOR, UTILITIES DEPARTMENT  
DELBERT L. BOYER  
CHIEF ENGINEER  
WILLIAM M. ROONEY  
DIRECTOR, MOTOR TRANSPORTATION  
WILLIAM L. JOHNSON  
DIRECTOR, RATE AND TAXES

April 3, 1980

Department of Energy  
Washington, D.C. 20461

ATTENTION: Howard Perry  
Director of Regulatory Assistance  
Office of Utility Systems

Re: Department of Energy  
Annual Report to Congress

Dear Sir:

The Wyoming Public Service Commission respectfully represents that the summary on page 4.99 of the subject report is not accurate since the report actually comments through January, 1980. Immediately upon the September 4, 1979 effective date of the Wyoming PSC rules, all utilities subject thereto were governed thereby, and any utility rules in conflict therewith were void.

In place of the summary paragraph on page 4.99 we recommend the following:

"In summary, the Wyoming PSC issued rules effective September 4, 1979 which immediately implemented generic PURPA standards as follows:

(1) Information to customers standard governing the four covered electric utilities with 105,074 customers;

April 3, 1980

(2) Termination of service standard governing the four covered electric utilities with 105,074 customers and the four covered gas utilities with 59,052 customers; and

(3) Master metering standard only applicable to new mobile home parks (not existing at the rule date); the public hearing evidence not supporting broader application under PURPA and Wyoming law."

We thank you for permitting our Commission to comment.

Yours very truly,



ALEX J. ELIOPULOS, Secretary

AJE:lb

# 5

## DOE ACTIVITIES IN SUPPORT OF PURPA

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Under Sections 116(b)(3) and 309(b)(3) of PURPA, DOE is required to list and briefly describe the various financial, regulatory assistance, and intervention activities that it is carrying out to further the purposes of Titles I and III of PURPA.\* In this chapter, we outline the mission and organization of the DOE office that has been delegated responsibility for providing this PURPA-related assistance. We then discuss the types of assistance being provided (as of February 1980) in three areas:

- Financial
- Regulatory Support and Analysis
- Intervention.

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\* Section 206 of ECPA establishes a requirement similar to the PURPA requirement for this annual report (i.e., to report to Congress annually on DOE's activities under Title II of ECPA). The applicable provisions of PURPA and ECPA are generically similar, in that they both relate to federal involvement in state regulation of utilities. Moreover, several key provisions of PURPA take the form of amendments parallel to the provisions of ECPA. Separate PURPA and ECPA annual reports would, therefore, be largely duplicative and potentially confusing. Accordingly, this annual report incorporates the requirements of Section 206 of ECPA. Specific applicable references to ECPA, as well as to any relevant interrelationships with PURPA, are delineated in each of the sections of this chapter describing DOE's activities.

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## 5.1 ORGANIZATION AND PROGRAM MISSIONS

Primary responsibility for promoting the purposes of PURPA and implementing the programmatic initiatives mandated and authorized in the act generally rests with the Office of Utility Systems (OUS) of DOE's Economic Regulatory Administration (ERA). PURPA-related responsibilities are carried out by two of the three OUS divisions: Regulatory Assistance and Regulatory Proceedings.\*

### 5.1.1 Division of Regulatory Assistance

The long-range goal of the Division of Regulatory Assistance (DRA) is to further federal energy conservation and alternative energy supply objectives through improved public regulation of retail utility operations, which is primarily a state responsibility. State-regulated utilities account for more than 50 percent of U.S. energy consumption, and state regulation can have a major impact on how this energy is supplied and used. This broad goal encompasses the three interrelated PURPA objectives of: (1) conservation of utility-supplied energy; (2) efficient production and distribution of that energy by the utilities; and (3) nondiscriminatory and equitable utility rates. To implement these purposes, DRA promulgates rules; provides financial assistance for basic state implementation, innovative rates projects, and consumer offices; and performs analytical studies and provides technical assistance for carrying out regulatory responsibilities.

### 5.1.2 Division of Regulatory Proceedings

The long-range goal of the Division of Regulatory Proceedings (DRP) is to further the purposes of PURPA and the national energy policy objectives of reducing reliance on foreign energy supplies, conserving energy, converting to more abundant domestic energy supplies, and developing renewable energy sources through professional advocacy in selected proceedings before federal and state regulatory agencies. Intervention activities are selected by the DOE Intervention Review Committee and carried out by staff (supported by contractor assistance when necessary) in the form of presenting testimony and other evidence in support of national energy policy.

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\* The third division, Power Supply and Reliability, has as its long-range goal the assurance of continuing reliability and adequacy of the nation's electric power supply.

## 5.2 FINANCIAL ASSISTANCE

Section 141 of PURPA authorized the appropriation of funds of up to \$58 million for FY1979 and \$60 million for FY1980 to assist the state regulatory authorities and nonregulated utilities in carrying out their responsibilities under Titles I and III. In FY1979, Congress appropriated a total of \$17.5 million for this purpose, which was distributed as follows:

- Basic PURPA grants -- \$10 million to acquire the technical expertise needed for consideration of the 11 PURPA standards and other PURPA-related activities
- Consumer offices -- \$2 million to establish or continue state-level offices to represent consumer interests in electric utility regulatory proceedings
- Innovative rates -- \$3.8 million to initiate or continue innovative rate structure analysis and implementation
- ECPA activities -- \$1.7 million to continue ECPA efforts.

According to a predetermined formula, an average of \$150,000 was awarded to each of 44 state regulatory commissions to support the consideration of PURPA standards under the basic PURPA grant program; somewhat smaller amounts were allocated to 31 municipally owned or cooperative utilities (half of the total number eligible). Ten consumer office and 21 innovative rate grants were awarded on a competitive basis. Exhibit 5.a (see end of chapter) presents a profile of the level and type of funding awarded to each state commission and nonregulated utility.

In the following sections, we discuss the four basic areas of DOE financial assistance to the states and covered utilities.

### 5.2.1 Basic PURPA Grants Program

Federal guidelines were issued in July 1979 detailing application procedures and eligibility criteria in receiving basic PURPA grants. In August 1979, DRA received 72 applications from state regulatory commissions and nonregulated utilities, requesting \$15 million in financial assistance for use in the consideration of PURPA standards and related activities. A total of 70 grants amounting to \$10 million were awarded. The state regulatory authorities and utilities indicated that these funds would be used to support consideration of the PURPA standards, hold evidentiary hearings on the lifeline rate issue, provide information to intervenors, prepare annual reports on PURPA activities, collect information and data pertinent to the cost-of-service standard, and obtain technical expertise as needed for achieving the purposes of PURPA.

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DOE ACTIVITIES IN SUPPORT OF PURPA

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5.2.2 Innovative Rates Program

Established under Title II of ECPA, the innovative rates program was amended with the passage of PURPA. PURPA authorized funds not to exceed \$8 million in FY1979 and \$10 million in FY1980 to initiate innovative rate projects and continue rate reform pilot projects initiated under ECPA. Actual funding available in 1979 was \$3.8 million.

Guidelines on eligibility criteria and application procedures were published simultaneously with guidelines for the basic PURPA grant program. The guidelines specified that projects were to result in basic tools, techniques, and organizational resources essential to innovative rate reform that would be applicable to other regulatory authorities -- not theoretical studies and models or large primary data collection efforts.

Under the innovative rates program, DRA awarded financial assistance through cooperative agreements for the performance of specified tasks. Tasks eligible for funding under the innovative rates program included: cost-of-service information systems; estimating customer class load characteristics; metering for innovative electric rates; rate information for consumers; examination of methods to assist low-income electric consumers; solar rate initiatives; testing direct load management systems; rate incentives for utility efficiency and analysis of cogeneration systems. Exhibit 5.b indicates the level of funding awarded to the states for each of these tasks.

5.2.3 Consumer Offices

Section 205 of ECPA established a program to support the operation of state offices to represent consumer interests in electric utility regulatory proceedings. PURPA authorized continuation of this program at a level of \$2 million in FY1979 and \$2 million in FY1980.

Grant awards were made on a competitive basis to 10 states in September 1979.\* Of the 10 states receiving a total of \$2 million, 6 had previously received funding under ECPA.

Federal guidelines for the consumer office grant program were published in July 1979. According to the guidelines, the consumer offices were to be operated independently of the utility regulatory commission. Typical functions of these offices include: assessing the impacts of proposed rate changes and other regulatory actions on

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\* States receiving grants were Alabama, Arkansas, Colorado, Delaware, Georgia, Illinois, Michigan, New Mexico, New York, and Utah.

## Exhibit 5.b

## FUNDING UNDER INNOVATIVE RATES PROGRAM

Task	Funding	State
Cost-of-Service Information Systems	\$806,500	- Arizona - Connecticut (Groton) - Idaho - Rhode Island - Texas (San Antonio) - Virginia
Estimating Customer Class Load Characteristics	246,300	- North Carolina (Blue Ridge EMC) - Rhode Island - Texas
Metering for Innovative Electric Rates	170,000	- Florida
Rate Information for Consumers	195,750	- Massachusetts - Missouri (Springfield)
Assistance to Low-Income Electric Consumers	512,000	- Connecticut - Iowa - Massachusetts - North Carolina - Virginia
Solar Rate Incentives	152,000	- New Mexico - Utah
Testing Direct Load Management Systems	598,500	- Texas (Austin) - California - North Carolina
Rate Incentives for Utility Efficiency	892,500	- Florida - Illinois - Massachusetts - New Hampshire - Utah - Virginia
Analysis of Cogeneration Systems	278,891	- Illinois - Nebraska (Lincoln)

consumers; providing technical and financial assistance to support consumers in their presentations before regulatory commissions; and advocating before regulatory commissions those positions determined by the office to be most advantageous to consumers. Continued support of these programs during the PURPA standards consideration process ensures consumer representation in discussion of rate reform, and thereby supports the three purposes of PURPA.

#### 5.2.4 Continuation of ECPA Programs

DRA is continuing to administer the innovative rates and consumer offices programs established under Title II of ECPA. During the past 4 years, several gas and electric utilities as well as state regulatory commissions have been involved in pilot utility implementation projects and electric utility rate demonstrations. A common goal of both programs is to encourage the design and adoption of innovative rates to promote the energy efficiency, equity, and energy conservation objectives set forth in ECPA and reiterated in PURPA.

##### 5.2.4.1 Pilot Utility Implementation Program

The pilot utility implementation program was authorized under Title II of ECPA; funds were distributed on a competitive basis to states and utilities in 1977, 1978, and, to a limited extent, 1979. The pilot program focuses on regulatory reform initiatives that encourage and lead to the permanent adoption of cost-based rates and energy management practices. Rate reform efforts have dealt with the elimination of declining-block energy charges, adoption of time of use rates, elimination of master metering, and establishment of comprehensive conservation programs. The experiences and lessons learned through this program about successful institutional approaches to utility rate design reform serve as valuable models for state and local regulatory authorities in considering and implementing the PURPA standards.

##### 5.2.4.2 Electric Utility Rate Demonstration Program

The focus of the electric utility rate demonstration program, also authorized under Title II of ECPA, has been on analyzing customer response to a variety of rate designs and load management programs. Although no new funds were available in FY1979, eight projects are continuing to operate with funds provided in previous years. Earlier demonstration results have provided detailed analyses of customer response to time-of-day rates; these data are currently being made available to other regulatory commissions and utilities. DRA has

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received computerized data from 12 of the 16 demonstration projects and is currently assessing how this information can best be compiled in a usable format to support the PURPA consideration process.

### 5.3 REGULATORY SUPPORT AND ANALYSIS

Under PURPA, DOE is authorized to provide regulatory support and analysis to assist the states in carrying out their duties and responsibilities under Titles I and III. PURPA specifies that this assistance can be provided by: periodically providing technical information on innovative ratemaking experiments and practices to state commissions and nonregulated utilities; providing direct technical assistance to states by ERA staff or through support contractors; and providing financial assistance.

In the following sections, we outline the regulatory support activities and the regulatory analysis activities DRA is providing the states and covered utilities.

#### 5.3.1 Regulatory Support Activities

Since the passage of PURPA, DRA has concentrated its resources on providing states and nonregulated utilities with sufficient information to initiate and carry out the PURPA consideration process. DRA's activities have included:

- Publishing (in the Federal Register) listings of all utilities covered by the requirements of PURPA for 1979 and 1980
- Issuing voluntary guidelines (as authorized by Section 131 of PURPA) on termination of service and solar and renewable energy resources
- Compiling and disseminating technical information on previous federal research dealing with rate design and ratemaking practices
- Providing assistance through the National Regulatory Research Institute in explaining the requirements of PURPA and discussing useful analytical techniques and approaches.

Each of these regulatory support activities is discussed in the following sections.

### 5.3.1.1 Listings of Covered Utilities

In accordance with Sections 102(c) and 301(d) of PURPA, DRA has developed listings of electric and gas utilities subject to PURPA requirements. The purpose of these listings was to provide states advance notification that PURPA standards should be considered in regulatory proceedings dealing with covered utilities.

The listings (for 1979 and 1980) were published in the Federal Register, and state regulatory commissions as well as nonregulated utilities had the opportunity to comment on the utilities included. State regulatory commissions were required to notify ERA if they exercise ratemaking authority over any of the utilities included.

### 5.3.1.2 Promulgation of Voluntary Guidelines

Included in PURPA (Section 131) are provisions that allow DOE to develop voluntary guidelines, as deemed necessary, for the states in carrying out the purposes of PURPA. DRA has evaluated the need for guidelines related to each of the 11 standards and decided to develop guidelines on those issues that depart from traditional regulatory practices.

Voluntary guidelines have been published on the termination of service standard and solar energy and renewable resources as they relate to the 11 PURPA standards. Over the next year, DOE plans to publish additional guidelines addressing the following ratemaking and regulatory standards and policies:

- Automatic adjustment clauses
- Cost-of-service standard (including marginal-cost pricing)
- Cost/benefit determination for the time-of-day, load management, and master metering standards
- Ratemaking standards for time-of-day, declining-block, seasonal, and interruptible rates
- Load management techniques.

Included in these guidelines will be a description of the need for proper monitoring and suggestions on how to design and implement appropriate monitoring methods.

As with previously published guidelines, the proposed guidelines will be published in the Federal Register to obtain public comment, and then revised based on comments received and public hearings. The division intends to supplement the voluntary guidelines by developing primers or other technical manuals.

DOE has decided not to issue guidelines on information to consumers at this time. Instead, DRA is in the final stages of developing an information package on this subject, which will include recommendations on how utilities can explain energy costs, convey information on conservation practices, and otherwise educate customers on rate structures associated with PURPA and rate reform.

A similar decision has been reached with regard to lifeline rates. DRA is currently developing an information package for state regulatory commissions consisting of case studies of lifeline electric rates as well as alternative approaches to the problems of low-income ratepayers. The case studies include in-depth reviews of 10 lifeline electric rates that have been implemented as well as 10 that have been rejected. The information, which has been gathered from utility companies and state regulatory authorities, should be available by July 1980.

#### 5.3.1.2.1 Guidelines on Termination of Service Standard

The first PURPA voluntary guideline developed by DRA deal with procedures for termination of both electric and gas utility service. The guidelines, published in the Federal Register (December 28, 1979), address four major issues raised in PURPA Sections 115(g) and 304(a): reasonable prior notice, reasonable opportunity to dispute, protection during health emergencies, and special provisions for the elderly and handicapped. Advisory in nature, the guidelines suggest procedures that safeguard consumer rights, prevent serious illness or death, and direct adequate attention to the special circumstances of special groups (i.e., elderly and handicapped). DOE recognizes that implementation of the guidelines may require changes in state laws or regulations currently in operation; however, the guidelines represent DOE's opinion of the minimum efforts necessary to achieve the intent of the termination of service standard and the stated purposes of PURPA.

#### 5.3.1.2.2 Guidelines on Solar Energy and Renewable Resources

In recognition that an increasing number of consumers are installing solar and renewable resource-powered energy systems, DRA has developed voluntary guidelines for considering the 11 standards with respect to solar energy renewable resources. The guidelines, published in the Federal Register (February 1980), note the implications of each of the ratemaking and regulatory standards as they relate to the use of solar energy and renewable resources and discuss how the adoption of these standards could affect the use of alternative energy systems.

### 5.3.1.3 Compilation and Dissemination of Technical Information

Section 132 of PURPA calls for the Secretary of DOE to provide, on a periodic basis, technical information to states on current experiments and practices in electric utility ratemaking, load management techniques, and methods for determining cost of service. As a first step toward fulfilling this obligation, DRA has drawn upon the vast reservoir of data and analysis resulting from federally funded studies, demonstration projects, and analyses conducted by private and public organizations. An annotated summary, entitled Electric and Gas Utility Topics: Current Documents, has been compiled and distributed to all state regulatory authorities and nonregulated utilities. This summary covers eight major utility rate topics: electric rate demonstrations; conservation; load management; rate design and reform; consumer offices; gas rate and supply; legislation; and demand forecasting. Order forms are included in the document to facilitate state and local access to the actual reports.

DRA plans to continue disseminating current information and data to those entities responsible for considering the PURPA standards. Over 1,000 documents have been distributed; the feasibility of establishing a clearinghouse is being investigated.

During the past year, DRA has sponsored or cosponsored several workshops to discuss the results of specific electric utility rate projects and pilot or case studies, as well as to foster information exchange among state commissions, consumer offices, and the public. In June 1979, a conference was held to facilitate the sharing of information related to consumer issues. Approximately 100 consumer advocates from 13 states and territories attended. Issues such as marginal-cost pricing and construction-work-in-progress were discussed, as well as the staffing and technical needs of state consumer offices.

Additional seminars are planned to deal with time-of-day rates as well as other PURPA standards and issues. For example, a 3-day seminar to discuss time-of-day rates and analytical techniques appropriate to load research, as well as study findings from the time-of-day rate experiments, was scheduled for March 1980.

Finally, DRA will analyze the types of load and operating data that are to be submitted to FERC under Section 133 of PURPA. Based on this review and an evaluation of the adaptability of the data to computerized cost-of-service analytical tools, DRA will determine whether or not a program should be undertaken to develop these tools and disseminate them to the states and nonregulated utilities for their use in considering the PURPA ratemaking standards.

#### 5.3.1.4 Assistance Through National Regulatory Research Institute

Under Section 603 of PURPA, DOE may make grants to "an institute established by the National Association of Regulatory Utility Commissioners" (NARUC) to conduct research on electric and gas utility regulatory policy issues, develop data processing and retrieval methods for ratemaking, and perform other functions directly related to the consideration of PURPA standards and other provisions of PURPA. Through the National Regulatory Research Institute (NRRI), NARUC is helping to achieve these objectives.

In FY1979, DRA provided over \$1 million to NRRI to assist in educating state and local authorities on the provisions of PURPA and to provide support in four specific areas: rate design, cost control, computer-assisted regulatory analysis, and regulatory information. NRRI has sponsored numerous workshops and conferences and prepared publications (see Appendix B) to disseminate information and discuss available techniques and ratemaking practices relevant to the PURPA standards. NRRI has also provided state-specific, on-site technical assistance on a limited basis.

During the current fiscal year, NRRI is funded at a similar level to continue providing technical assistance. However, the funding is through a grant, rather than a contractual arrangement to allow flexibility in responding to state needs.

#### 5.3.2 Regulatory Analysis Activities

DOE has also undertaken several regulatory analysis activities to assist the states and covered utilities in carrying out their responsibilities under PURPA. These activities include:

- Conducting a state-specific assessment of regulatory authority capabilities for conducting PURPA regulatory proceedings
- Preparing an annual report to Congress on the status of the PURPA consideration process
- Conducting (in consultation with FERC) a gas rate design study as the basis for making recommendations to improve gas utility rate design and conservation.

##### 5.3.2.1 Assessment of State Regulatory Authority and Utility Technical Capabilities and Needs

As a basis for structuring and implementing technical assistance programs for the states and nonregulated utilities, DRA has conducted periodic needs assessments.

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During the last quarter of 1979, the division conducted a comprehensive telephone survey of 45 state regulatory authorities to assess their needs for assistance and information in the areas of load management; marginal cost pricing and time-of-day rates; computer modeling capabilities; cost-benefit analytical techniques; financial analysis of impacts of cost-based rates; oil consumption; solar energy; and energy conservation. Respondents to the survey indicated a need for basic, fundamental materials, such as: primers on marginal-cost pricing and time-of-day rates; a manual on cost-benefit analysis for evaluating load management and time-of-day rates; and a study of the financial implications of cost-based rates as required by PURPA. Discussions with state commission staff also revealed that 54 percent of the respondents do not currently have computer capability and are relying on basic PURPA grant funds to acquire such capability.

DRA has developed a set of five recommendations based on the survey results:

1. Establish a program to assist state public utility commissions in developing demand forecasting models for use in estimating long-term demand.
2. Conduct a series of workshops or training seminars focusing on the types of computer facilities, programs, and staff capabilities required to develop computer capability. (DRA concluded that this "how to" approach would benefit state regulatory authorities that currently do not have computer capability but are interested in acquiring such capability.)
3. Develop a set of primers and methodologies for dealing with marginal-cost pricing, power brokering and pooling, time-of-day rates, and general data gathering for cost-of-service determinations.
4. Perform a cost-benefit analysis of the PURPA rate standards.
5. Conduct a series of studies to address such issues as marginal cost pricing, cost of service, and load management as they relate to PURPA.

These recommendations (along with the analysis of data and information submitted to DOE by state regulatory authorities and nonregulated utilities in their Form ERA-166s) will serve as DRA's basis for continually refining its technical assistance efforts.

#### 5.3.2.2 Annual Report to Congress

As a means of overseeing the states' progress in considering and implementing the PURPA ratemaking and regulatory standards, Congress required DOE to establish a reporting procedure.

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State regulatory authorities and nonregulated utilities were required to submit status reports to DOE annually beginning in November 1979. Congress also required DOE to review these reports and to submit a progress report to Congress no later than May 1980, and then annually for each of the next 10 years.

DRA developed Form ERA-166 to obtain the necessary information from the state regulatory authorities and utilities. This report to Congress represents the first of the required annual reports on the status of the consideration process.

Over the coming year, DOE plans to refine Form ERA-166 to ensure that its requests for information can be readily understood by the state regulatory authorities and utilities, and the information received by DOE will thus be more complete and accurate.

#### 5.3.2.3 Natural Gas Rate Design Study

DOE, in consultation with FERC, is required under Title III, Section 306, of PURPA to conduct a gas rate design study as the basis for making recommendations to Congress on improving gas utility rate design and conservation. In this study, DOE is evaluating, both conceptually and empirically, the effect of specified alternative rate designs (e.g., marginal cost pricing) and regulatory policies (e.g., interruptible service, well-head natural gas pricing) on several factors (e.g., demand for end-use consumption).

This study is required to be submitted to Congress by May 1, 1980. Legislative recommendations must be developed and submitted to Congress by November 4, 1980. In the course of conducting the study and developing the legislative proposals, DOE has provided the opportunity for comment and consultation by the states, private industry, and the general public.

The study is being performed under the direction of the DRA, which is being supported by several contractors in carrying out various phases. Recent efforts have focused on the development of analytical tools (i.e., computer models) to simulate a gas distributor and its customer base; extensive data collection; and discussions with gas industry representatives to identify other relevant factors. The consequences of alternative rate design are being analyzed using these hypothetical gas utility models.

#### 5.3.2.4 Analysis of Pilot and Demonstration Programs

DRA is currently collecting and synthesizing information from the pilot utility implementation projects and electric rate

demonstrations. Documents will be prepared on each of the following topics: implementation of time-of-day rates, including necessary metering equipment and billing practices; load management techniques; master metering; and information to consumers. For example, these documents will provide both a quantitative and qualitative account of the actual costs, effects, and problems encountered when time-of-day rates were implemented. Incorporated into each will be a discussion of how these experiments are applicable and can be useful to the states in their consideration of the PURPA standards.

#### 5.4 INTERVENTION ACTIVITIES

Sections 121 and 305 of PURPA grant the Secretary of DOE authority to intervene and participate in state regulatory and nonregulated utility proceedings involving consideration of utility rate reform. Under this authority, DOE can intervene in proceedings to advocate regulatory policies and practices that further national energy policies as well as the specific purposes of PURPA. These interventions address: reform of electric and natural gas policies and rate structures; implementation of utility conservation, load management, power pooling, wheeling, and interconnection programs; establishment of reasonable oil, gas, coal, and other energy price and transportation policies; and recognition of new and alternative energy supplies, including solar, geothermal, wind, biomass, and other renewable energy resources.

The Division of Regulatory Proceedings is addressing reform of electric rates and regulatory standards in conjunction with the consideration of PURPA standards in proceedings in Arizona, Connecticut, Delaware, Florida, Louisiana, Maryland, Missouri, New Mexico, and Virginia, as well as before the Los Angeles Department of Water and Power (the nation's largest municipal electric utility). DOE has also presented comments in the Tennessee Valley Authority's consideration of the PURPA service practice standards. Testimony in these proceedings as well as in federal proceedings at FERC and the Interstate Commerce Commission (ICC) have addressed the basic purposes of PURPA: conservation, efficiency, and equity, and other related energy policy objectives.

DRP has intervened in proceedings before ICC to ensure adequate consideration of national energy policies. Escalating railroad coal tariffs seriously impact the coal conversion program and have similar implications for the proposed oil backout legislation. In these cases DOE has argued that national energy policy objectives must be carefully weighed in setting tariffs for coal transportation because

coal rates substantially influence economic decisions by utilities and other captive coal users to construct new or convert existing generating plants to displace oil and gas. The Department is also participating at ICC in a proceeding considering a joint line agreement and a proceeding considering a merger application involving situations where the lack of competition would have adverse effects on coal tariffs.

DRP interventions at FERC pursuant to Section 405 of the DOE Organization Act are directed toward proceedings concerning oil and natural gas pipelines; natural gas pricing and certification; electric wholesale rates, interconnections, power pooling, and coal gasification projects. For example, the Department is participating in a proceeding to consider an application to have FERC exercise its broadened powers under PURPA to order interconnection of electric utilities. DRP has also filed testimony in a proceeding in which FERC is determining fundamental issues on oil pipeline regulation. Another intervention before this forum supported the nation's first coal gasification plant using commercial scale equipment. The specific PURPA standards which DOE addresses are determined by the scope of the proceeding and the circumstances of the particular utility involved. Other potential and ongoing federal and state proceedings are continually being monitored and analyzed to identify additional intervention opportunities in which DOE's participation would contribute to achieving national energy policy objectives. The following are brief synopses of the issues being addressed in the regulatory proceedings in which DOE is participating.

#### 5.4.1 State Proceedings

- Maryland/Virginia/District of Columbia: Washington Gas Light. Shortly after the passage of PURPA, DRP petitioned to intervene in regulatory proceedings in Maryland, Virginia, and the District of Columbia to consider the standby rate application proposed by Washington Gas Light. The utility had proposed a rate for customers using solar and alternative energy systems, which DOE opposed on the grounds that it was not cost-justified and discouraged conservation by consumers. The decision by an administrative law judge of the Maryland PSC recommending denial of the application clearly reflects the position DRP advocated in the proceeding.
- Delaware: Delmarva Power and Light Company. DOE has intervened in Phase II of this rate proceeding. Testimony has been filed advocating adoption of marginal-cost pricing as the basis for the design of electric tariffs, implementation of time-of-use rates where cost-justified, and elimination of declining-block rates. The Delaware PSC had decided to consider the PURPA rate-design standards during the rate hearings. A final decision has not yet been issued.

- Connecticut: Northeast Utilities. DOE intervened in a regulatory proceeding involving a rate increase application submitted by two subsidiaries of Northeast Utilities: Connecticut Light and Power and Hartford Electric Light Company. In Phase I of the proceeding, DOE presented testimony urging approval of revenue levels adequate to accelerate the completion of a plant under construction to displace oil-fired generation. In Phase II, DOE advocated adoption of relevant marginal costs as the basis for electric rate structures and filed recommended tariffs. In a decision issued in March 1980, the Connecticut Division of Public Utility Control (DPUC) adopted the concept of marginal costs in principle as a guide in setting electric rates and determined that a specific marginal cost methodology would be selected in a generic hearing on cost of service, which is scheduled to begin in May 1980. The DPUC also adopted specific rate structure changes that reflect many concerns presented by the Department and made PURPA determinations as requested by DOE.
- Virginia: Virginia Electric Power Company (VEPCO). The Virginia State Corporation Commission will consider PURPA standards and rate design in a regulatory proceeding for VEPCO. The cost-of-service, time-of-day, seasonal, declining-block, and interruptible rates standards, as well as load management policies, will be evaluated.
- California: Los Angeles Department of Water and Power. The Los Angeles Department of Water and Power, the largest electric municipal utility in the United States, was one of the first nonregulated utilities to initiate PURPA consideration. DOE provided comments on the proposed rules of practice and procedures for the hearings and submitted testimony in February 1980. In this proceeding, DOE advocated marginal-cost based rates and a fuel adjustment clause reflecting the purposes of PURPA as applied to a municipal utility system.
- Louisiana Public Service Commission: Gulf States Utilities. DOE has petitioned to intervene in this proceeding and will present testimony advocating adoption and implementation of the PURPA standards.
- Arizona Public Service Commission: Arizona Public Service Company; New Mexico Public Service Commission: Public Service of New Mexico; Missouri Public Service Commission: Kansas City Power and Light Company. DOE has filed petitions to intervene in these proceedings, which will address consideration of the PURPA standards. A petition will also be filed to participate in the Florida PSC's generic PURPA proceeding.

#### 5.4.2 FERC Proceedings

- Central Power and Light (CP&L) et al. DOE has intervened in this proceeding involving FERC's consideration of CP&L's application to order interconnection of the Electric Reliability Council of Texas with the Southwest Power Pool. This is the first application made to FERC to exercise its broadened powers under PURPA to require interconnection of electric utilities.
- ANR Coal Gasification. FERC recently approved a major coal gasification demonstration project and its financing consistent with DOE's recommendations in the proceeding.
- Williams Pipeline Co. DOE has advocated rate-base principles of original cost less depreciation and support for a current cost-of-capital standard in this proceeding in which FERC is determining the basis on which it will regulate oil pipelines. This position is consistent with DOE's position in another FERC proceeding, Trans Alaska Pipeline (TAPS).

#### 5.4.3. Other Federal Agencies (ICC)

- San Antonio v. Burlington Northern, Inc. DOE argued that the requested rate was not cost-justified and that the attempt to improve the financial health of the railroads through increased coal rates must be balanced with the national energy goal of coal conversion. In November 1979, the Department of Justice filed an appellate brief representing DOE's views seeking reversal of ICC's approval of a \$17.23-per-ton-mile rate in San Antonio, Texas v. Burlington Northern, Inc. (ICC Docket No. 36180). DOE is awaiting ICC's decision in Ex Parte 347, Western Coal Investigation Guidelines for Railroad Rate Structure, and is participating in Chicago and Northwestern Transportation Company (ICC Docket No. 29066) to ensure competition in rail service to the Powder River Basin. Appeal of the ICC'S adverse decision issued in Increased Rates on Coal, Louisville and Nashville Railroad (ICC Docket No. 37063 - Eastern Coal rates) is under consideration.

Exhibit 5.a

LEVEL AND TYPE OF FUNDING AWARDED TO STATES (FY1979).

STATE COMMISSION	BASIC PURPA GRANTS	INNOVATIVE RATES	STATE CONSUMER OFFICES	ECPA PILOT CONTINUATION	TOTAL
Alabama Public Service Commission	200,000		228,500		428,500
Alaska Public Utility Commission	200,000				200,000
Arizona Corporation Commission	150,000	133,000			283,000
Arkansas Public Service Commission	200,000		190,000		390,000
California Public Utility Commission	100,000	250,000		502,500*	852,500
Colorado Public Utility Commission	195,880		205,000		400,880
Connecticut Public Utility Control Authority	200,000	105,000		325,000	630,000
Delaware Public Service Commission	167,600		208,000		375,600
District of Columbia Public Service Commission	190,600				190,600
Florida Public Service Commission	125,000	370,000			495,000
Georgia Public Service Commission	100,000		142,500		242,500
Hawaii Public Utility Commission	200,000				200,000
Idaho Public Utility Commission	200,000	120,000			320,000
Illinois Commerce Commission	167,430	152,891	244,000		564,321
Indiana Public Service Commission	200,000				200,000
Iowa State Commerce Commission	175,000	110,000			285,000
Kansas State Corporation Commission	171,429				171,429
Kentucky State Corporation Commission	200,000				200,000
Louisiana					

\* California Energy Commission (not PUC)

Exhibit 5.a (continued)

LEVEL AND TYPE OF FUNDING AWARDED TO STATES (FY1979)

STATE COMMISSION	BASIC PURPA GRANTS	INNOVATIVE RATES	STATE CONSUMER OFFICES	ECPA PILOT CONTINUATION	TOTAL
Maine Public Utility Commission	200,000				200,000
Maryland Public Service Commission	200,000				200,000
Massachusetts Department of Public Utilities	200,000	483,500			683,500
Michigan Public Service Commission	200,000		205,000		405,000
Minnesota Public Service Commission	193,946				193,946
Mississippi					
Missouri Public Service Commission	179,875				179,875
Montana Public Service Commission	200,000				200,000
Nebraska	(No PUC)				
Nevada Public Service Commission	200,000				200,000
New Hampshire Public Utility Commission	200,000	130,000			330,000
New Jersey Department of Energy	200,000				200,000
New Mexico Public Service Commission	200,000	72,000	225,000		497,000
New York Department of Public Service	200,000		183,000		383,000
North Carolina Utilities Commission	198,896	325,000		434,973	958,859
North Dakota Public Service Commission	200,000				200,000
Ohio Public Service Commission	200,000				200,000
Oklahoma Corporation Commission	200,000				200,000
Oregon					

Exhibit 5.a (continued)

LEVEL AND TYPE OF FUNDING AWARDED TO STATES (FY1979)

STATE COMMISSION	BASIC PURPA GRANTS	INNOVATIVE RATES	STATE CONSUMER OFFICES	ECPA PILOT CONTINUATION	TOTAL
Pennsylvania Public Service Commission	200,000				200,000
Puerto Rico					
Rhode Island Public Utility Commission	200,000	200,500			400,500
South Carolina Public Service Commission	200,000				200,000
South Dakota Public Utility Commission	200,000				200,000
Tennessee					
Texas Public Utility Commission	69,020	83,300			152,320
Utah Public Service Commission	200,000	222,000	169,000		591,000
Vermont Public Service Board	199,055				199,055
Virginia State Corporation Commission	200,000	500,000			700,000
Washington					
West Virginia Public Service Commission	200,000				200,000
Wisconsin Public Service Commission	200,000				200,000
Wyoming					
<b>TOTAL</b>	<b>8,183,721</b>	<b>3,257,191</b>	<b>2,000,000</b>		<b>14,703,385</b>

Exhibit 5.a (continued)

LEVEL AND TYPE OF FUNDING AWARDED TO STATES (FY1979)

NONREGULATED UTILITIES	BASIC PURPA GRANTS	INNOVATIVE RATES	STATE CONSUMER OFFICES	ECPA PILOT CONTINUATION	TOTAL
Alabama: Office of the Attorney General			228,500		228,500
Alaska					
Arizona: Salt River Project	50,000				50,000
Arkansas: Office of the Attorney General			190,000		190,000
California: Sacramento Munic. Util. District	17,333				
California: Santa Clara Electric Department	18,667				
California: Turlock Irrigation District	64,000				100,000
Colorado: Office of Energy Conservation			205,000		205,000
Connecticut: Groton Department of Utilities		39,000			39,000
Delaware: Office of the Public Advocate			208,000		208,000
District of Columbia					
Florida: Clay Electric Cooperative, Inc.	20,250				
Florida: Jacksonville Electric Authority	8,250				
Florida: Lakeland Department of Electricity	23,250				
Florida: Orlando Utilities Commission	23,250				75,000
Georgia: Consumer Utilities Counsel			142,000		
Georgia: Flint Elec. Membership Corporation	50,000				
Georgia: Jackson Elec. Membership Corporation	50,000				242,500
Hawaii					
Idaho					

Exhibit 5.a (continued)

LEVEL AND TYPE OF FUNDING AWARDED TO STATES (FY1979)

NONREGULATED UTILITIES	BASIC PURPA GRANTS	INNOVATIVE RATES	STATE CONSUMER OFFICES	ECPA PILOT CONTINUATION	TOTAL
Illinois: Office of Consumer Services			244,000		
Illinois: Springfield Dept. of Pub. Property	32,570				276,570
Indiana					
Iowa: Muscatine Power and Water	25,000				25,000
Kansas: Kansas City Board of Public Utilities	28,571				28,571
Kentucky					
Louisiana: City of New Orleans	127,525				127,525
Maine					
Maryland					
Massachusetts					
Michigan: Office of the Attorney General			205,000		205,000
Minnesota					
Mississippi: Singing River Elec. Power Assn.	63,953				
Mississippi: Southern Pine Elec. Power Assn.	64,640				128,593
Missouri: Springfield City Utilities	20,000	62,750		154,000	237,250
Montana					
Nebraska: Lincoln Electric System	68,000	168,000			
Nebraska: Nebraska Public Power District	36,000				
Nebraska: Omaha Public Power District	96,000				368,000
Nevada					

Exhibit 5.a (continued)

LEVEL AND TYPE OF FUNDING AWARDED TO STATES (FY1979)

NONREGULATED UTILITIES	BASIC PURPA GRANTS	INNOVATIVE RATES	STATE CONSUMER OFFICES	ECPA PILOT CONTINUATION	TOTAL
New Hampshire					
New Jersey					
New Mexico: Office of the Attorney General			225,000		225,000
New York: State Consumer Protection Board			183,000		183,000
North Carolina: Blue Ridge Elec. Memb. Corp.		87,000			87,000
North Dakota					
Ohio					
Oklahoma					
Oregon: Clatskanie People's Utility District	86,851				
Oregon: Umatilla Elec. Coop. Association	60,600				147,451
Pennsylvania					
Puerto Rico: Water Resources Authority	200,000				200,000
Rhode Island					
South Carolina					
South Dakota					
Tennessee					
Texas: Cities of Austin, Garland, Lubbock	84,700				
Texas: Austin Municipal Utility System		98,500			
Texas: San Antonio City Public Service Board		140,000			323,200
Utah: Commission of Consumer Services			169,000		169,000

Exhibit 5.a (continued)

LEVEL AND TYPE OF FUNDING AWARDED TO STATES (FY1979)

NONREGULATED UTILITIES	BASIC PURPA GRANTS	INNOVATIVE RATES	STATE CONSUMER OFFICES	ECPA PILOT CONTINUATION	TOTAL
Vermont					
Virginia					
Washington: Snohomish Co. Pub. Util. Dist. #1	64,364			378,644	
Washington: Seattle City Light	30,000				473,008
West Virginia					
Wisconsin					
Wyoming					
<b>TOTAL</b>	<b>1,413,774</b>	<b>595,250</b>	<b>2,000,000</b>	<b>533,144</b>	<b>4,542,168</b>

## Appendix

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# Appendix A

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## REPORTING FORMAT FOR PURPA STANDARDS: FORM ERA-166

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Shortly following the enactment of PURPA, DOE began to establish a system for the annual reporting required by state regulatory authorities and nonregulated utilities. In this appendix, we briefly review:

- Development of Reporting Requirements and Form ERA-166
- Form Format
- Form Receipt
- Data Processing
- Data Analysis.

### A.1 DEVELOPMENT OF REPORTING REQUIREMENTS AND FORM ERA-166

DOE's first step was to establish an internal OUS/DRA working group to determine the relevant data needed for the mandated annual congressional reporting. After preparation of a preliminary report form, additional input was requested from within DOE as well as from the Rural Electric Administration. Concurrent with these internal activities, DOE personnel attended public meetings of utilities and regulatory organizations (e.g., NARUC, EEI, APPA, NRECA) to convey that a reporting document was being developed and to request comment when the proposed rulemaking was published. The proposed rulemaking and the accompanying report form, designated ERA-166, were published in the Federal Register on April 17, 1979, and submitted for approval by the Energy Information Agency (EIA) and the Office of Management and Budget (OMB). Public hearings were held in Denver, Colorado, and Washington, D.C., and public comments were received through June 18, 1979. Based on the 50 public comments received, DOE modified and significantly shortened the reporting requirements including revisions to format and content of ERA-166. OMB approval of the revised

## REPORTING FORMAT

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form was received on July 31, 1979, and the final rule and associated report form were published in the Federal Register on August 13, 1979 (a copy of the form is attached as Exhibit A.1).

Beginning on August 16, 1979, OUS mailed copies of the reporting form to state regulatory authorities and nonregulated utilities. Prior to the distribution, OUS had begun coordinating with EIA to develop a package of computer data processing and analysis. This package included keypunching, error reviewing and data editing, and data reduction through the use of an interactive software program. OUS also contracted for assistance in the data review and preparation of supplementary exhibit material.

### A.2 FORM FORMAT

Form ERA-166 is set up as 12 schedules: the first requests general information about the respondent and its utility regulatory authority, and the remaining 11 address actions taken for each of the 11 standards. The schedules generally request a yes/no (or similar limited response) answer, and allow for additional narrative where necessary. The data requested on each standard relate to status, consideration procedure, evidence presented, findings and conclusions, specific characteristics of the adopted standard, and (to a limited extent) quality of the support for the findings and conclusions.

### A.3 FORM RECEIPT

The initial report was scheduled to be received by DOE from state regulatory authorities and nonregulated utilities on or before November 9, 1979. Although reports were received from the last week of October through March, most (95 percent) were received by November 30, 1979 (see Exhibit A.2). Nonreporting state regulatory authorities and nonregulated utilities were mailed a reminder on November 29, 1979. A copy of each report was filed in OUS, a second copy was provided to ERA's Office of Public Information for public viewing, and a third copy was used as a working document for data processing by EIA.

## REPORTING FORMAT

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### A.4 DATA PROCESSING

Prior to keypunching, each report's data responses for the 12 schedules were manually reviewed for completeness and order-of-magnitude quantity accuracy. Most of the errors discovered appeared to be caused by (1) unclear instructions, (2) individual responses not matching precisely with the predesignated questions, or, most commonly, (3) lack of careful reading of instructions. Additional spot checks were made by comparing the reporting form with other information sources (e.g., Lehman Report on Public Utilities, DOE survey of hearing procedures and regulatory orders). All errors uncovered were called to the attention of the reporting entity and any agreed-upon changes in the report were confirmed by a follow-up letter.

### A.5 DATA ANALYSIS

As a result of continual problems in the data programming functions, computer analysis was abandoned for this year, and the manual data reduction and analysis were upgraded and expanded. OUS staff drew specific data regarding the extent and quality of the states' and utilities' PURPA consideration process for review, compilation, and analysis from the reports' schedules and relevant attachments.

DOE's review and analysis focused on three major issues:

1. What is the status of the respondent, and what is the impact (measured by number of customers covered) of adoption (or rejection) of a standard?
2. Has the consideration process met the minimum procedural requirements of PURPA as well as an acceptable (in DOE's view) level of quality of evidence to arrive at a decision?
3. What are the characteristics of the standard implemented, and how do they conform with the standard as set forth by PURPA?

This review and analysis provided the basis for DOE's presentation of state and utility progress on PURPA in this annual report.

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Exp. 12-82

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U. S. DEPARTMENT OF ENERGY  
Economic Regulatory Administration  
Washington, D. C. 20461

PURPA ANNUAL REPORT ON ELECTRIC AND GAS UTILITIES

This report is mandatory under Pub.L. 95-617 (PURPA) sections 116 and 309

Information and General Instructions for Completing  
PURPA Annual Report on Electric and Gas Utilities

I. General

The PURPA Annual Report on Electric and Gas Utilities must be completed by each State regulatory authority (with respect to each covered electric and gas utility for which it has ratemaking authority) and each covered nonregulated electric and gas utility consistent with these instructions. All information shall be provided in a clear and concise manner. Information required regarding the consideration process for each standard shall, to the maximum extent practical, be summarized from the written determinations and orders issued. ERA reserves the right to request any supplementary information from the State regulatory authority or covered nonregulated utility as may be needed to fully understand the report.

II. Coverage

A. *Electric utilities.* The electric utilities and regulated electric utilities covered by this report whose total sales of electric energy for purposes

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other than resale exceeded 500 million kilowatt-hours during any calendar year beginning after December 31, 1975, and before the immediately preceding calendar year. For example, in the case of the first report (due November 9, 1979) the applicable years for determining the threshold are 1976 and 1977.

B. *Gas utilities.* The gas utilities' and nonregulated gas utilities covered by this report are those whose total sales of natural gas for purposes other than resale exceeded 10 billion cubic feet during any calendar year beginning after December 31, 1975, and before the immediately preceding calendar year. (See example in paragraph A, above.)

C. *Exclusion of wholesale sales.* The requirements of this report do not apply to the operation of an electric or gas utility, or to proceedings respecting such operations, to the extent that such operations or proceedings relate to sales of electric energy or natural gas for purposes of resale.

D. *List of covered utilities.* ERA will publish in the Federal Register a list of utilities covered under PURPA for each reporting year (i.e., for 1979, 44FR17448, March 21, 1979). The inclusion or exclusion of any utility on the list does not affect the legal obligation to report by such utility or the responsible State regulatory authority under PURPA.

### III. Schedule

A. *Due date.* The report shall be submitted not later than November 9, 1979, and annually thereafter for 10 years.

B. *Reporting period.* The reporting period for the first PURPA Annual Report on Electric and Gas Utilities shall be November 9, 1978 to June 30, 1979. For each subsequent report, the reporting period shall be July 1 of the previous year to June 30 of the year in which the report is due.

### IV. Address; Number of Copies

Each reporting entity shall send the original and two copies of the PURPA Annual Report on Electric and Gas Utilities to the following address:

PURPA Annual Report on Electric and Gas Utilities,  
Office of Utility Systems, Economic Regulatory  
Administration, Department of Energy, 2000 M Street,  
N.W., Room 4016, Washington, D.C. 20461.

V. Inclusion of Annual Report on Prohibition on Sale and Direct Industrial Use of Natural Gas for Outdoor Lighting

The State regulatory authority may submit to ERA, with the PURPA Annual Report on Electric and Gas Utilities, the Annual Report on the Prohibition on Sale and Direct Industrial Use of Natural Gas for Outdoor Lighting (Gaslight Report), if required pursuant to section 402 of the Powerplant and Industrial Fuel Use Act of 1978 (Pub.L. 95-620) and applicable regulations (10 CFR Part 516).

## VI. Definitions

Unless otherwise expressly provided, for the purposes of this reporting requirement--

(A) The term "adopt" means, with respect to the standards established by sections 113 and 303 of PURPA, to put into effect.

(B) The term "class" means, with respect to electric and gas consumers, any group of such consumers who have similar characteristics of electric or gas energy use, respectively.

(C) The term "consideration process" means, with respect to any of the standards established by sections 111, 113 or 303 of PURPA, the set of appropriate procedures carried out by a State regulatory authority or nonregulated utility culminating in a determination as to whether or not to adopt or implement such standard.

(D) The term "electric consumer" means any person, State agency, or Federal agency, to which electric energy is sold other than for purposes of resale.

(E) The term "electric utility" means any person, State agency, or Federal agency, which sells electric energy.

(F) The term "evidence" means any testimony, data, staff reports, technical analyses, briefs, or any other statements, documents or information admitted into the record of the proceedings respecting the consideration of the standards.

(G) The term "Federal agency" means an executive agency (as defined in section 105 of the United States Code).

(H) The term "gas consumer" means any person, State agency, or Federal agency, to which natural gas is sold other than for purposes of resale.

(I) The term "gas utility" means any person, State agency, or Federal agency, engaged in the local distribution of natural gas, and the sale of natural gas to any ultimate consumer of natural gas.

(J) The term "implement" means, with respect to the standards established by section 111 of PURPA, to put into effect.

(K) The term "load management technique" means any technique (other than a time-of-day or seasonal rate) to reduce the maximum kilowatt demand on the electric utility, including ripple or radio control mechanisms, and other types of interruptible electric service, energy storage devices, and load-limiting devices.

(L) The term "nonregulated electric utility" means any electric utility with respect to which neither the Tennessee Valley Authority (TVA) nor any State regulatory authority has ratemaking authority.

(M) The term "nonregulated gas utility" means any gas utility with respect to which no State regulatory authority has ratemaking authority.

(N) The term "person" means an individual, partnership, corporation, unincorporated association or any group, organization or entity.

(O) The term "rate" means:

(1) Any price, rate, charge, or classification made, demanded, observed, or received with respect to the sale of electric energy by an electric utility to an electric consumer or the sale of natural gas to a gas consumer.

(2) Any rule, regulation, or practice respecting any such rate, charge, or classification; and

(3) Any contract pertaining to the sale of electric energy to an electric consumer or the sale of natural gas to a gas consumer.

(P) The term "ratemaking authority" means authority to fix, modify, approve, or disapprove rates.

(Q) The term "sale" means a transfer to a purchaser for consideration and:

(1) when used with respect to electric energy, includes any exchange of electric energy; or

(2) when used with respect to natural gas, includes any exchange of natural gas.

(R) The term "State" means a State, the District of Columbia, and Puerto Rico.

(S) The term "State agency" means a State, political subdivision thereof, and any agency or instrumentality of either.

(T) The term "State regulatory authority" means any State agency which has ratemaking authority with respect to:

(1) The sale of electric energy by any electric utility (other than by such State agency), and in the case of an electric utility with respect to which the TVA has ratemaking authority, such term means the TVA; or

(2) The sale of natural gas by any gas utility (other than by such State agency).

VII. General Instructions for Completing Schedules

A. *Schedules.* The PURPA Annual Report on Electric and Gas Utilities consists of the following 12 schedules:

- Schedule 1 - General Information on the State Regulatory Authority or Covered Nonregulated Utility
- Schedule 2 - Cost-of-Service Standard
- Schedule 3 - Declining Block Rates Standard
- Schedule 4 - Time-of-Day Rates Standard
- Schedule 5 - Seasonal Rates Standard
- Schedule 6 - Interruptible Rates Standard
- Schedule 7 - Load Management Techniques Standard
- Schedule 8 - Master Metering Standard
- Schedule 9 - Automatic Adjustment Clauses Standard
- Schedule 10 - Information to Consumers Standard
- Schedule 11 - Procedures for Termination of Electric (Gas) Service Standard
- Schedule 12 - Advertising Standard

Schedules 1-12 are to be completed for each electric utility listed in section 3.1(a) of Schedule 1. Only Schedules 1, 11, and 12 are to be completed for each gas utility listed in section 3.1(b) of Schedule 1.

B. *Attachments.* Space in addition to that provided may be necessary for supplementing the answers to some questions. In such a case, please provide a numbered attachment to the appropriate schedule and indicate the attachment number next to the answer. The use of an attachment does not void the requirement that all questions be answered and tables completed. Attachments should be designated by using the schedule number followed by a dash followed by a sequential number starting with 1 for each schedule. (For example, attachment "3-1" would be the first attachment to schedule 3; attachment "2-5" would be the fifth attachment to schedule 2.)

C. *Utility designations.* The completion of sections 3.1(a) and (b) of Schedule 1 will provide a list of all covered electric and gas utilities, respectively. When completing these sections, please designate each by a sequential number starting with 1, as illustrated in the example below. A combination utility (i.e., one that sells both electricity and gas) must be listed and numbered twice - once for each in the spaces provided for sections 3.1(a) and (b). For each utility listed indicate the corresponding utility code from the attached list of codes. If no code is listed, please contact person specified in paragraph VIII for assignment of a code number.

	<u>Name</u>	<u>Utility No.</u>	<u>Utility Code</u>
3.1(a)	E1 Elec. Utility A	1	12345
	E2 Elec. Utility B	2	56789
	E3 Elec. Utility C	3	90123
	E4 Elec. Utility D	4	34567
	E5 . . E20		
3.1(b)	G1 Gas Utility A	5	78901
	G2 Gas Utility B	6	56789
	G3		
	G4 . . G15		

(D) *Generic option.* The tables in Schedules 2-12 are designed to allow one report for two or more utilities for which the consideration process was conducted on a generic basis for the applicable standard. Please use the space provided at the beginning of Schedules 2-12 to indicate which utilities are included in the "generic" category for that standard. Answers to questions for utilities included under the generic category should only be placed in the "Generic" column which has been provided, and not redundantly under each utility's column.

(E) *Omission of information.* Requested information and responses shall be omitted only if, and to the extent that, such information is identical to the information submitted in the previous year's PURPA Annual Report on Electric and Gas Utilities.

(F) *Additional utilities.* The tables in Schedules 2-12 are designed to accommodate a maximum of 15 utilities. If there are more than 15 utilities that need to be listed on the tables, use extra forms and renumber the columns as needed.

#### VIII. Additional Information and Assistance

If additional information or assistance is needed in completing the form, please contact:

William G. (Bill) Smith, Office of Utility Systems,  
Economic Regulatory Administration, U.S. Department  
of Energy, 2000 M Street, N.W. (Room 4016E),  
Washington, D.C. 20461, (202) 254-8209.

#### IX. Certification

Section 2.0 of Schedule 1 shall be completed by the chairman of the State regulatory authority or the chief executive officer of the nonregulated utility or other commissioner or officer authorized to file this report on behalf of the authority or utility.

Schedule 1

General Information on State Regulatory Authority  
 or Covered Nonregulated Utility

Instructions

Please complete the following questions. For questions soliciting information on both electric and gas utilities, please distinguish, as indicated. For questions which are not applicable to either the electric or gas utility or State regulatory authority, indicate by N/A.

1.0 IDENTIFICATION DATA

1.1 What is the name, address and code of your State regulatory authority (or covered nonregulated utility)? See attached list for code designations. Please insert this code at the top of each page of this report as indicated.

_____	Name		
_____	Street		
_____	_____	_____	_____
City	State	Zip Code	
_____			
Regulatory (or Utility) Code			

1.2 What is the name, title, address and phone number of the person(s) designated as a point of contact:

(a) for the electric utility portions of this report?

(1)

(2)

_____	_____	Name		Title
_____	Street			
_____	_____	_____	_____	
City	State	Zip Code		
( )	_____			
Phone Number				

_____	_____	Name		Title
_____	Street			
_____	_____	_____	_____	
City	State	Zip Code		
( )	_____			
Phone Number				

(b) for the gas utility portion of this report? (If same as 1.2(a), write "SAME" under 1.2(b)(1).)

(1)

(2)

_____	_____	Name		Title
_____	Street			
_____	_____	_____	_____	
City	State	Zip Code		
( )	_____			
Phone Number				

_____	_____	Name		Title
_____	Street			
_____	_____	_____	_____	
City	State	Zip Code		
( )	_____			
Phone Number				

Schedule 1  
 General Information

2.0 CERTIFICATION

I certify that the information and data presented in this report (Schedules 1 through 12 and attachments) are true, accurate and complete to the best of my knowledge, and I hereby authorize its release for the purpose of complying with sections 116 and 309 of the Public Utility Regulatory Policies Act, Pub. L. 95-617.

Name & Title	Signature	Date

Title 18 U.S.C. 1001, makes it a crime for any person knowingly and willfully to make to any Agency or Department of the United States any false, fictitious or fraudulent statements as to any matter within his or her jurisdiction.

3.0 LEGAL RESPONSIBILITIES

3.1(a) List the covered electric utilities for which you have ratemaking authority. (If none, write "NONE" in (E1)). Covered nonregulated electric utilities should enter name on line (E1). In the case of combination utilities, i.e., those that sell both electricity and natural gas (for regulated and nonregulated utilities), list the utility twice - once each in spaces provided for question 3.1(a) and (b). For each utility listed, please assign numbers sequentially starting with 1 and enter each number under the "Utility Number" column. Each utility will be reported on by this number in subsequent schedules. For each utility listed, also indicate the corresponding utility code from the attached list of utilities.

	Name	Utility Number	Utility Code
(E1)			
(E2)			
(E3)			
(E4)			
(E5)			
(E6)			

Schedule 1  
 General Information

3.0 LEGAL RESPONSIBILITIES (continued)

3.1(a) continued

	<u>Name</u>	<u>Utility Number</u>	<u>Utility Code</u>
(E7)	_____	_____	_____
(E8)	_____	_____	_____
(E9)	_____	_____	_____
(E10)	_____	_____	_____
(E11)	_____	_____	_____
(E12)	_____	_____	_____
(E13)	_____	_____	_____
(E14)	_____	_____	_____
(E15)	_____	_____	_____
(E16)	_____	_____	_____
(E17)	_____	_____	_____
(E18)	_____	_____	_____
(E19)	_____	_____	_____
(E20)	_____	_____	_____

3.1(b) List the covered gas utilities for which you have ratemaking authority. (If none, write "NONE" in (G1).) Covered nonregulated gas utilities should enter name on line (G1). For each utility listed, assign numbers sequentially starting with the next number in the series which ended utility numbers in 3.1(a) and enter each number under the "Utility Number" column. If no utilities are listed in 3.1(a), begin numbering sequence with 1. For each utility listed, also indicate the corresponding utility code from the attached list of utilities.

	<u>Name</u>	<u>Utility Number</u>	<u>Utility Code</u>
(G1)	_____	_____	_____
(G2)	_____	_____	_____
(G3)	_____	_____	_____
(G4)	_____	_____	_____

Schedule 1  
General Information

3.0 LEGAL RESPONSIBILITIES (continued)

3.1(b) continued

	<u>Name</u>	<u>Utility Number</u>	<u>Utility Code</u>
(G5)	_____	_____	_____
(G6)	_____	_____	_____
(G7)	_____	_____	_____
(G8)	_____	_____	_____
(G9)	_____	_____	_____
(G10)	_____	_____	_____
(G11)	_____	_____	_____
(G12)	_____	_____	_____
(G13)	_____	_____	_____
(G14)	_____	_____	_____
(G15)	_____	_____	_____
(G16)	_____	_____	_____
(G17)	_____	_____	_____
(G18)	_____	_____	_____
(G19)	_____	_____	_____
(G20)	_____	_____	_____

3.2(a) List the additional electric utilities to be covered by next year's annual report. (If none, write "NONE" in space 3.2(a)(1).)

- (1) \_\_\_\_\_
- (2) \_\_\_\_\_
- (3) \_\_\_\_\_
- (4) \_\_\_\_\_
- (5) \_\_\_\_\_

Schedule 1  
General Information

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3.0 LEGAL RESPONSIBILITIES (continued)

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7

3.2(b) List the additional gas utilities to be covered by next year's annual report. (If none, write "NONE" in space 3.2(b)(1).)

- (1) \_\_\_\_\_
- (2) \_\_\_\_\_
- (3) \_\_\_\_\_
- (4) \_\_\_\_\_
- (5) \_\_\_\_\_

---

3.3(a) List (by name and citation) applicable State laws and regulations which provide ratemaking authority with respect to the covered electric utilities listed in 3.1(a). Please include a list (by citation) of applicable administrative laws and procedures.

- (1) \_\_\_\_\_
- (2) \_\_\_\_\_
- (3) \_\_\_\_\_
- (4) \_\_\_\_\_
- (5) \_\_\_\_\_

(b) List (by name and citation) applicable State laws and regulations which provide ratemaking authority with respect to the covered gas utilities listed in 3.1(b). Please include a list (by citation) of applicable administrative laws and procedures. (If same as 3.3(a), write "SAME" in 3.3(b)(1).)

- (1) \_\_\_\_\_
  - (2) \_\_\_\_\_
  - (3) \_\_\_\_\_
  - (4) \_\_\_\_\_
  - (5) \_\_\_\_\_
-

Schedule 1  
General Information

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3.0 LEGAL RESPONSIBILITIES (continued)

---

3.4(a) List (by name and citation) any State laws and regulations which restrict or limit your authority to consider any standard established by PURPA sections 111(d) and 113(b). Also, describe such restrictions or limitations.

(1) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(2) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3.4(b) List (by name and citation) any State laws and regulations which restrict your authority to consider any standard established by PURPA section 303(b). Also, describe such restrictions or limitations.

(1) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(2) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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Schedule 1  
General Information

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3.0 LEGAL RESPONSIBILITIES (continued)

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3.5 Please describe the evidentiary standard applied in State judicial review of your regulatory decisions (e.g., substantial evidence, preponderance evidence, etc.).

•

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4.0 PURPA IMPLEMENTATION PLAN

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Please describe briefly your overall plan for considering the standards set forth in sections 111(d), 113(b) and 303(b) of PURPA. Please describe the plan in a general way, but include the following elements:

- (1) A schedule of the anticipated commencement and completion dates for the PURPA consideration process, delineated by standard and by utility.
  - (2) Resources to be allocated, including budget and personnel.
  - (3) Procedures for satisfying requirements of sections 121 and 122 of PURPA.
-



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Form Approved  
OMB No. 038-R0422  
Exp. 12-82

Regulatory (or Utility) Code \_\_\_\_\_

Schedule 2

Cost-of-Service Standard

Introduction

Section 111(d)(1) of PURPA establishes the Cost-of-Service Standard which states: "Rates charged by any electric utility for providing electric service to each class of electric consumers shall be designed, to the maximum extent practicable, to reflect the costs of providing electric service to such class, as determined under section 115(a)."

Section 115(a) states: "In undertaking the consideration and making the determination under section 111 with respect to the standard concerning cost of service established by section 111(d)(1), the costs of providing electric service to each class of electric consumers shall, to the maximum extent practicable, be determined on the basis of methods prescribed by the State regulatory authority (in the case of a State regulated electric utility) or by the electric utility (in the case of a non-regulated electric utility). Such methods shall to the maximum extent practicable--

"(1) permit identification of differences in cost-incurrence, for each such class of electric consumers, attributable to daily and seasonal time of use of service and

"(2) permit identification of differences in cost-incurrence attributable to differences in customer demand, and energy components of cost. In prescribing such methods, such State regulatory authority or nonregulated electric utility shall take into account the extent to which total costs to an electric utility are likely to change if--

"(A) additional capacity is added to meet peak demand relative to base demand; and

"(B) additional kilowatt-hours of electric energy are delivered to electric consumers."

SPECIAL INSTRUCTIONS

Please complete the following questions regarding the consideration and determination of this standard. These questions are to be answered for each covered utility listed in 3.1 of Schedule 1. A "GENERIC" option has been provided to allow for reporting on multiple utilities covered in a generic consideration process for this standard. In the following space list the utility number of each utility covered under such a generic process.

o Utilities covered in a single generic consideration process for this standard:

1 _____	6 _____
2 _____	7 _____
3 _____	8 _____
4 _____	9 _____
5 _____	10 _____



Cost-of-Service Standard

1.5

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Sales in preceding year of customers covered by this order (in thousands of dollars)	• Residential																
	• Industrial																
	• Commercial																
	Other (specify) _____																

INSTRUCTIONS FOR COMPLETING QUESTION 2.0

- A. Answer question 2.0 for each utility whose status code is:
- 4-9 for the answer to question 1.1 of this schedule; and
  - 4-9 for the answer to question 1.2 of this schedule.
- B. Answer question 2.0 by using the following code:
- Y = yes                      N = no

2.0

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
In your opinion, have your proceedings and actions substantially conformed to the requirements of Title I (or III) of PURPA for this standard																	

INSTRUCTIONS FOR COMPLETING QUESTION 3.0

- A. Answer question 3.0 for each utility whose status is:
- 4-9 for the answer to question 1.1 of this schedule; and
  - 1, 2, or 3 for the answer to question 1.2 of this schedule
- B. Answer question 3.0 by using the following code:
- Y = yes                      N = no



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Cost-of-Service Standard

	Generic	Utility															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
4.5	Testimony or other evidence taken																
4.6	Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA																
4.7	Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA																
4.8	Decision rendered based upon findings included in such determination and evidence presented during hearing																
4.9	Proposed or interim written determination																
4.10	Final written determination																
4.11	Determination made available to public																
4.12	Total No. of intervenors compensated *																
4.13	Total dollar amount paid to intervenors *																
4.14	Conservation of energy supplied by electric or gas utility **																
4.15	Optimization of the efficiency of use of facilities and resources by electric or gas utility **																
4.16	Equitable rates to electric or gas consumers **																

\* See instruction "C" to this question  
\*\* See instruction "D" to this question





















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Exp. 12-82

Regulatory (or Utility) Code \_\_\_\_\_

Schedule 3

Declining Block Rates Standard

Introduction

Section 111(d)(2) of PURPA establishes the Declining Block Rates Standard which states: "The energy component of a rate, or the amount attributable to the energy component in a rate, charged by any electric utility for providing electric service during any period to any class of electric consumers may not decrease as kilowatt-hour consumption by such class increases during such period except to the extent that such utility demonstrates that the costs to such utility of providing electric service to such class, which costs are attributable to such energy component, decrease as such consumption increases during such period."

SPECIAL INSTRUCTIONS

Please complete the following questions regarding the consideration and determination of this standard. These questions are to be answered for each covered utility listed in 3.1 of Schedule 1. A "GENERIC" option has been provided to allow for reporting on multiple utilities covered in a generic consideration process for this standard. In the following space list the utility number of each utility covered under such a generic process.

o Utilities covered in a single generic consideration process for this standard:

1 _____	6 _____
2 _____	7 _____
3 _____	8 _____
4 _____	9 _____
5 _____	10 _____



Schedule J

Declining Block Rates Standard

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1.5	Sales in preceding year of customers covered by this order (in thousands of dollars)																
	° Residential																
	° Industrial																
	° Commercial																
	Other (specify) _____																

**INSTRUCTIONS FOR COMPLETING QUESTION 2.0**

- A. Answer question 2.0 for each utility whose status code is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 4-9 for the answer to question 1.2 of this schedule.
- B. Answer question 2.0 by using the following code:
- Y = yes            N = no

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
2.0	In your opinion, have your proceedings and actions substantially conformed to the requirements of Title I (or III) of PURPA for this standard																

**INSTRUCTIONS FOR COMPLETING QUESTION 3.0**

- A. Answer question 3.0 for each utility whose status is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 1, 2, or 3 for the answer to question 1.2 of this schedule
- B. Answer question 3.0 by using the following code:
- Y = yes            N = no



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Schedule J  
Declining Block Rates Standard

	Generic	Utility															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
4.5	Testimony or other evidence taken																
4.6	Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA																
4.7	Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA																
4.8	Decision rendered based upon findings included in such determination and evidence presented during hearing																
4.9	Proposed or interim written determination																
4.10	Final written determination																
4.11	Determination made available to public																
4.12	Total No. of intervenors compensated *																
4.13	Total dollar amount paid to intervenors *																
4.14	Conservation of energy supplied by electric or gas utility **																
4.15	Optimization of the efficiency of use of facilities and resources by electric or gas utility **																
4.16	Equitable rates to electric or gas consumers **																

\* See instruction "C" to this question  
\*\* See instruction "D" to this question

















Schedule 4

Time-of-Day Rates Standard

Introduction

Section 111(d)(3) of PURPA establishes the Time-of-Day Rates Standard which states: "The rates charged by any electric utility for providing electric service to each class of electric consumers shall be on a time-of-day basis which reflects the costs of providing electric service to such class of electric consumers at different times of the day unless such rates are not cost-effective with respect to such class, as determined under section 115(b)."

Section 115(b) states: "In undertaking the consideration and making the determination required under section 111 with respect to the standard for time-of-day rates established by section 111(d)(3), a time-of-day rate charged by an electric utility for providing electric service to each class of electric consumers shall be determined to be cost-effective with respect to each such class if the long-run benefits of such rate to the electric utility and its electric consumers in the class concerned are likely to exceed the metering costs and other costs associated with the use of such rates."

SPECIAL INSTRUCTIONS

Please complete the following questions regarding the consideration and determination of this standard. These questions are to be answered for each covered utility listed in 3.1 of Schedule 1. A "GENERIC" option has been provided to allow for reporting on multiple utilities covered in a generic consideration process for this standard. In the following space list the utility number of each utility covered under such a generic process.

o Utilities covered in a single generic consideration process for this standard:

- |         |          |
|---------|----------|
| 1 _____ | 6 _____  |
| 2 _____ | 7 _____  |
| 3 _____ | 8 _____  |
| 4 _____ | 9 _____  |
| 5 _____ | 10 _____ |



Time-of-Day Rates Standard

1.5

	Utility															
	Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Sales in preceding year of customers covered by this order (in thousands of dollars)																
• Residential																
• Industrial																
• Commercial																
Other (specify) _____																

INSTRUCTIONS FOR COMPLETING QUESTION 2.0

- A. Answer question 2.0 for each utility whose status code is:
- 4-9 for the answer to question 1.1 of this schedule; and
  - 4-9 for the answer to question 1.2 of this schedule.
- B. Answer question 2.0 by using the following code:
- Y = yes            N = no

2.0

	Utility															
	Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
In your opinion, have your proceedings and actions substantially conformed to the requirements of Title I (or III) of PURPA for this standard																

INSTRUCTIONS FOR COMPLETING QUESTION 3.0

- A. Answer question 3.0 for each utility whose status is:
- 4-9 for the answer to question 1.1 of this schedule; and
  - 1, 2, or 3 for the answer to question 1.2 of this schedule
- B. Answer question 3.0 by using the following code:
- Y = yes            N = no



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## Time-of-Day Rates Standard

	Utility															
	Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
4.5	Testimony or other evidence taken															
4.6	Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA															
4.7	Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA															
4.8	Decision rendered based upon findings included in such determination and evidence presented during hearing															
4.9	Proposed or interim written determination															
4.10	Final written determination															
4.11	Determination made available to public															
4.12	Total No. of intervenors compensated *															
4.13	Total dollar amount paid to intervenors *															
4.14	Conservation of energy supplied by electric or gas utility **															
4.15	Optimization of the efficiency of use of facilities and resources by electric or gas utility **															
4.16	Equitable rates to electric or gas consumers **															

\* See instruction "C" to this question

\*\* See instruction "D" to this question









Schedule 4 (con't)

Time-of-Day Rates

**INSTRUCTIONS FOR COMPLETING QUESTION 10.0**

A. Answer question 10.0 for each utility whose status is 4-9 for question 1.1 of this schedule. Question 10.0 solicits information regarding the quality of the evidence considered when the determination was made either to implement or not to implement this standard.

B. Answer question 10.0 using the following code:

- C = conclusive evidence
- I = inconclusive evidence
- N = minimal or no evidence

10.0 What was the quality of the evidence regarding this standard with respect to the following:

Type of Evidence	Utility															
	Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
10.1 Time-related variation in cost-of-service assessment utilizing:																
10.11 System lambda																
10.12 Class demand elasticity*																
10.13 Long-term incremental operating cost																
10.2 Identification of periods where system lambda was higher than its daily average																
10.3 Adequacy of procedure to identify hours of the day and days of the week where system lambda was higher than its daily (weekly) average																
10.4 Assessment of both capacity and energy costs of providing service for:																
10.41 An increase in peak demand																
10.42 An increase in kilowatt-hours of service																

\*Elasticity of demand is the ratio of the percentage change in the quantity demanded to the percentage change in price.





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Regulatory (or Utility) Code \_\_\_\_\_

Schedule 5

Seasonal Rates Standard

Introduction

Section 111(d)(4) of PURPA establishes the Seasonal Rates Standard which states: "The rates charged by an electric utility for providing electric service to each class of electric consumers shall be on a seasonal basis which reflects the costs of providing service to such class of consumers at different seasons of the year to the extent that such costs vary seasonally for such utility."

SPECIAL INSTRUCTIONS

Please complete the following questions regarding the consideration and determination of this standard. These questions are to be answered for each covered utility listed in 3.1 of Schedule 1. A "GENERIC" option has been provided to allow for reporting on multiple utilities covered in a generic consideration process for this standard. In the following space list the utility number of each utility covered under such a generic process.

o Utilities covered in a single generic consideration process for this standard:

1 _____	6 _____
2 _____	7 _____
3 _____	8 _____
4 _____	9 _____
5 _____	10 _____



Schedule 5

Seasonal Rates Standard

1.5

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Sales in preceding year of customers covered by this order (in thousands of dollars)	° Residential																
	° Industrial																
	° Commercial																
	Other (specify) _____																

INSTRUCTIONS FOR COMPLETING QUESTION 2.0

A. Answer question 2.0 for each utility whose status code is:

1. 4-9 for the answer to question 1.1 of this schedule; and
2. 4-9 for the answer to question 1.2 of this schedule.

B. Answer question 2.0 by using the following code:

Y = yes                      N = no

2.0

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
In your opinion, have your proceedings and actions substantially conformed to the requirements of Title I (or III) of PURPA for this standard																	

INSTRUCTIONS FOR COMPLETING QUESTION 3.0

A. Answer question 3.0 for each utility whose status is:

1. 4-9 for the answer to question 1.1 of this schedule; and
2. 1, 2, or 3 for the answer to question 1.2 of this schedule

B. Answer question 3.0 by using the following code:

Y = yes                      N = no



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## Schedule 5

## Seasonal Rates Standard

	Generic	Utility														
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
4.5	Testimony or other evidence taken															
4.6	Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA															
4.7	Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA															
4.8	Decision rendered based upon findings included in such determination and evidence presented during hearing															
4.9	Proposed or interim written determination															
4.10	Final written determination															
4.11	Determination made available to public															
4.12	Total No. of intervenors compensated *															
4.13	Total dollar amount paid to intervenors *															
4.14	Conservation of energy supplied by electric or gas utility **															
4.15	Optimization of the efficiency of use of facilities and resources by electric or gas utility **															
4.16	Equitable rates to electric or gas consumers **															

\* See instruction "C" to this question

\*\* See instruction "D" to this question











Schedule 5 (con't)

Seasonal Rates Standard

	Type of Evidence	Utility																
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
10.17	The months of the year for which average system operating cost was above annual average operating cost																	
10.2	Effects:	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
10.21	Benefits in generator fuel savings																	
10.22	Benefits in total operating cost savings																	
10.23	Benefits in capacity																	
10.24	Cost of billing																	
10.3	Class demand elasticity*																	
10.4	Causes of capacity expansion:	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
10.41	Need to maintain system reliability																	
10.42	Opportunity to reduce total costs of electricity service																	
10.43	Need to replace existing service																	

\*Elasticity of demand is the ratio of the percentage change in the quantity demanded to the percentage change in price.

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Regulatory (or Utility) Code \_\_\_\_\_

Schedule 6

Interruptible Rates Standard

Introduction

Section 111(d)(5) of PURPA establishes the Interruptible Rates Standard which states: "Each electric utility shall offer each industrial and commercial electric consumer an interruptible rate which reflects the cost of providing interruptible service to the class of which such consumer is a member."

SPECIAL INSTRUCTIONS

Please complete the following questions regarding the consideration and determination of this standard. These questions are to be answered for each covered utility listed in 3.1 of Schedule 1. A "GENERIC" option has been provided to allow for reporting on multiple utilities covered in a generic consideration process for this standard. In the following space list the utility number of each utility covered under such a generic process.

o Utilities covered in a single generic consideration process for this standard:

1 _____	6 _____
2 _____	7 _____
3 _____	8 _____
4 _____	9 _____
5 _____	10 _____



Interruptible Rates Standard

1.5

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Sales in preceding year of customers covered by this order (in thousands of dollars)	• Residential																
	• Industrial																
	• Commercial																
	Other (specify) _____																

**INSTRUCTIONS FOR COMPLETING QUESTION 2.0**

- A. Answer question 2.0 for each utility whose status code is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 4-9 for the answer to question 1.2 of this schedule.
- B. Answer question 2.0 by using the following code:
- Y = yes            N = no

2.0

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
In your opinion, have your proceedings and actions substantially conformed to the requirements of Title I (or III) of PURPA for this standard																	

**INSTRUCTIONS FOR COMPLETING QUESTION 3.0**

- A. Answer question 3.0 for each utility whose status is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 1, 2, or 3 for the answer to question 1.2 of this schedule
- B. Answer question 3.0 by using the following code:
- Y = yes            N = no



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Interruptible Rates Standard

	Generic	Utility															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
4.5	Testimony or other evidence taken																
4.6	determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA																
4.7	Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA																
4.8	Decision rendered based upon findings included in such determination and evidence presented during hearing																
4.9	Proposed or interim written determination																
4.10	Final written determination																
4.11	Determination made available to public																
4.12	Total No. of intervenors compensated *																
4.13	Total dollar amount paid to intervenors *																
4.14	Conservation of energy supplied by electric or gas utility **																
4.15	Optimization of the efficiency of use of facilities and resources by electric or gas utility **																
4.16	Equitable rates to electric or gas consumers **																

\* See instruction "C" to this question  
\*\* See instruction "D" to this question















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Regulatory (or Utility) Code \_\_\_\_\_

Schedule 7

Load Management Techniques Standard

Introduction

Section 111(d)(6) of PURPA establishes the Load Management Techniques Standard which states: "Each electric utility shall offer to its electric consumers such load management techniques as the State regulatory authority (or the nonregulated electric utility) has determined will--

- "(A) be practicable and cost-effective, as determined under section 115(c),
- "(B) be reliable, and
- "(C) provide useful energy or capacity management advantages to the electric utility."

Section 115(c) states: "In undertaking the consideration and making the determination required under section 111 with respect to the standard for load management techniques established by section 111(d)(6), a load management technique shall be determined, by the State regulatory authority or nonregulated electric utility, to be cost-effective if--

- "(1) such technique is likely to reduce maximum kilowatt demand on the electric utility, and
- "(2) the long-run cost-savings to the utility of such reduction are likely to exceed the long-run costs to the utility associated with implementation of such technique."

SPECIAL INSTRUCTIONS

Please complete the following questions regarding the consideration and determination of this standard. These questions are to be answered for each covered utility listed in 3.1 of Schedule 1. A "GENERIC" option has been provided to allow for reporting on multiple utilities covered in a generic consideration process for this standard. In the following space list the utility number of each utility covered under such a generic process.

- o Utilities covered in a single generic consideration process for this standard:

1 _____	6 _____
2 _____	7 _____
3 _____	8 _____
4 _____	9 _____
5 _____	10 _____



Load Management Techniques Standard

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1.5	Sales in preceding year of customers covered by this order (in thousands of dollars)																
	• Residential																
	• Industrial																
	• Commercial																
	Other (specify) _____																

**INSTRUCTIONS FOR COMPLETING QUESTION 2.0**

- A. Answer question 2.0 for each utility whose status code is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 4-9 for the answer to question 1.2 of this schedule.
- D. Answer question 2.0 by using the following code:
- Y = yes            N = no

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
2.0	In your opinion, have your proceedings and actions substantially conformed to the requirements of Title I (or III) of PURPA for this standard																

**INSTRUCTIONS FOR COMPLETING QUESTION 3.0**

- A. Answer question 3.0 for each utility whose status is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 1, 2, or 3 for the answer to question 1.2 of this schedule
- B. Answer question 3.0 by using the following code:
- Y = yes            N = no

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Schedule 7

Load Management Techniques Standard

	Utility														
	Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14
3.0	In your opinion, have your proceedings and actions satisfied the requirements of PURPA Title I (or II) to the maximum extent practicable for the portion of the consideration process conducted after Nov. 9, 1978?														

INSTRUCTIONS FOR COMPLETING QUESTION 4.0

A. Answer questions 4.1 through 4.11 by using the following code:

Y = yes                      N = no

D. Answer questions 4.12 and 4.13 for each utility that offered opportunity for intervenor compensation (i.e., answer to question 4.4 is "Y") by filling in the appropriate number.

C. Answer questions 4.14, 4.15 and 4.16 for each utility for which a determination of appropriate impact was made (i.e., answer to question 4.6 is "Y").

D. In questions 4.14, 4.15 and 4.16 please indicate the type of effect this standard is expected to have on the items listed by using the following code:

P = Positive effect      N = Negative effect      Z = No effect

4.0 In your consideration process, which of the following steps have you taken?

	Utility														
	Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14
4.1	Prior public notice of hearing(s)														
4.2	Hearing(s) open to the public														
4.3	Opportunity for Intervenor Participation														
4.4	Opportunity for intervenor compensation														

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## Schedule 7

## Load Management Techniques Standard

	Generic	Utility															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
4.5	Testimony or other evidence taken																
4.6	Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA																
4.7	Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA																
4.8	Decision rendered based upon findings included in such determination and evidence presented during hearing																
4.9	Proposed or interim written determination																
4.10	Final written determination																
4.11	Determination made available to public																
4.12	Total No. of intervenors compensated *																
4.13	Total dollar amount paid to intervenors *																
4.14	Conservation of energy supplied by electric or gas utility **																
4.15	Optimization of the efficiency of use of facilities and resources by electric or gas utility **																
4.16	Equitable rates to electric or gas consumers **																

\* See instruction "C" to this question

\*\* See instruction "D" to this question















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Schedule B  
Master Metering Standard

Introduction

Section 113(b)(1) of PURPA establishes the Master Metering Standard which states: "To the extent determined appropriate under section 115(d), master metering of electric service in the case of new buildings shall be prohibited or restricted to the extent necessary to carry out the purposes of this title."

Section 115(d) states: "Separate metering shall be determined appropriate for any new building for purposes of section 113(b)(1) if--

- "(1) there is more than one unit in such building,
- "(2) the occupant of each such unit has control over a portion of the electric energy used in such unit, and
- "(3) with respect to such portion of electric energy used in such unit, the long-run benefits to the electric consumers in such building exceed the costs of purchasing and installing separate meters in such building."

SPECIAL INSTRUCTIONS

Please complete the following questions regarding the consideration and determination of this standard. These questions are to be answered for each covered utility listed in 3.1 of Schedule 1. A "GENERIC" option has been provided to allow for reporting on multiple utilities covered in a generic consideration process for this standard. In the following space list the utility number of each utility covered under such a generic process.

o Utilities covered in a single generic consideration process for this standard:

1 _____	6 _____
2 _____	7 _____
3 _____	8 _____
4 _____	9 _____
5 _____	10 _____



		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1.5	Sales in preceding year of customers covered by this order (in thousands of dollars)																
	• Residential																
	• Industrial																
	• Commercial																
	Other (specify) _____																

**INSTRUCTIONS FOR COMPLETING QUESTION 2.0**

A. Answer question 2.0 for each utility whose status code is:

1. 4-9 for the answer to question 1.1 of this schedule; and
2. 4-9 for the answer to question 1.2 of this schedule.

B. Answer question 2.0 by using the following code:

Y = yes            N = no

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
2.0	In your opinion, have your proceedings and actions substantially conformed to the requirements of Title I (or III) of PURPA for this standard																

**INSTRUCTIONS FOR COMPLETING QUESTION 3.0**

A. Answer question 3.0 for each utility whose status is:

1. 4-9 for the answer to question 1.1 of this schedule; and
2. 1, 2, or 3 for the answer to question 1.2 of this schedule

B. Answer question 3.0 by using the following code:

Y = yes            N = no



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Master Metering Standard

	Generic	Utility															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
4.5	Testimony or other evidence taken																
4.6	Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA																
4.7	Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA																
4.8	Decision rendered based upon findings included in such determination and evidence presented during hearing																
4.9	Proposed or interim written determination																
4.10	Final written determination																
4.11	Determination made available to public																
4.12	Total No. of intervenors compensated *																
4.13	Total dollar amount paid to intervenors *																
4.14	Conservation of energy supplied by electric or gas utility **																
4.15	Optimization of the efficiency of use of facilities and resources by electric or gas utility **																
4.16	Equitable rates to electric or gas consumers **																

\* See instruction "C" to this question  
\*\* See instruction "D" to this question











Schedule 9

Automatic Adjustment Clauses Standard

Introduction

Section 113(b)(2) of PURPA establishes the Automatic Adjustment Clauses Standard which states: "No electric utility may increase any rate pursuant to an automatic adjustment clause unless such clause meets the requirements of section 115(e)."

Section 115(e) states:

- "(1) An automatic adjustment clause of an electric utility meets the requirements of this subsection if--
  - "(A) such clause is determined, not less often than every four years, by the State regulatory authority (with respect to an electric utility for which it has ratemaking authority) or by the electric utility (in the case of a nonregulated electric utility), after an evidentiary hearing, to provide incentives for efficient use of resources (including incentives for economical purchase and use of fuel and electric energy) by such electric utility, and
  - "(B) such clause is reviewed not less often than every two years, in the manner described in paragraph (2), by the State regulatory authority having ratemaking authority with respect to such utility (or by the electric utility in the case of a nonregulated electric utility), to insure the maximum economies in those operations and purchases which affect the rates to which such clause applies.
- "(2) In making a review under subparagraph (B) of paragraph (1) with respect to an electric utility, the reviewing authority shall examine and, if appropriate, cause to be audited the practices of such electric utility relating to costs subject to an automatic adjustment clause, and shall require such reports as may be necessary to carry out such review (including a disclosure of any ownership or corporate relationship between such electric utility and the seller to such utility of fuel, electric energy, or other items).
- "(3) As used in this subsection and section 113(b), the term 'automatic adjustment clause' means a provision of a rate schedule which provides for increases or decreases (or both), without prior hearing, in rates reflecting increases or decreases (or both) in costs incurred by an electric utility. Such term does not include an interim rate which takes effect subject to a later determination of the appropriate amount of the rate."

SPECIAL INSTRUCTIONS

Please complete the following questions regarding the consideration and determination of this standard. These questions are to be answered for each covered utility listed in 1.1 of Schedule 1. A "GENERIC" option has been provided to allow for reporting on multiple utilities covered in a generic consideration process for this standard. In the following space list the utility number of each utility covered under such a generic process.

o Utilities covered in a single generic consideration process for this standard:

1 _____	6 _____
2 _____	7 _____
3 _____	8 _____
4 _____	9 _____
5 _____	10 _____



Automatic Adjustment Clauses Standard

1.5

	Generic	Utility														
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Sales in preceding year of customers covered by this order (in thousands of dollars)																
• Residential																
• Industrial																
• Commercial																
Other (specify) _____																

**INSTRUCTIONS FOR COMPLETING QUESTION 2.0.**

- A. Answer question 2.0 for each utility whose status code is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 4-9 for the answer to question 1.2 of this schedule.
- B. Answer question 2.0 by using the following code:
- Y = yes            N = no

2.0

	Generic	Utility														
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
In your opinion, have your proceedings and actions substantially conformed to the requirements of Title I (or III) of PURPA for this standard																

**INSTRUCTIONS FOR COMPLETING QUESTION 3.0**

- A. Answer question 3.0 for each utility whose status is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 1, 2, or 3 for the answer to question 1.2 of this schedule
- B. Answer question 3.0 by using the following code:
- Y = yes            N = no



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Automatic Adjustment Clauses Standard

	Generic	Utility															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
4.5	Testimony or other evidence taken																
4.6	Determination made that it is appropriate to implement this standard to carry out the purposes of PURPA																
4.7	Determination made that it is appropriate not to implement this standard to carry out the purposes of PURPA																
4.8	Decision rendered based upon findings included in such determination and evidence presented during hearing																
4.9	Proposed or interim written determination																
4.10	Final written determination																
4.11	Determination made available to public																
4.12	Total No. of intervenors compensated *																
4.13	Total dollar amount paid to intervenors *																
4.14	Conservation of energy supplied by electric or gas utility **																
4.15	Optimization of the efficiency of use of facilities and resources by electric or gas utility **																
4.16	Equitable rates to electric or gas consumers **																

\* See instruction "C" to this question  
\*\* See instruction "D" to this question













## Schedule 10

## Information to Consumers Standard

Introduction

Section 113(b)(3) of PURPA establishes the Information to Consumers Standard which states: "Each electric utility shall transmit to each of its electric consumers information regarding rate schedules in accordance with the requirements of section 115(f)."

Section 115(f) states:

- "(1) For purposes of the standard for information to consumers established by section 113(b)(3), each electric utility shall transmit to each of its electric consumers a clear and concise explanation of the existing rate schedule and any rate schedule applied for (or proposed by a nonregulated electric utility) applicable to such consumer. Such statement shall be transmitted to each such consumer--
  - "(A) not later than sixty days after the date of commencement of service to such consumer or ninety days after the standard established by section 113(b)(3) is adopted with respect to such electric utility, whichever last occurs, and
  - "(B) not later than thirty days (sixty days in the case of an electric utility which uses a bimonthly billing system) after such utility's application for any change in a rate schedule applicable to such consumer (or proposal of such a change in the case of a nonregulated utility).
- "(2) For purposes of the standard for information to consumers established by section 113(b)(3), each electric utility shall transmit to each of its electric consumers not less frequently than once each year--
  - "(A) a clear and concise summary of the existing rate schedules applicable to each of the major classes of its electric consumers for which there is a separate rate, and
  - "(B) an identification of any classes whose rates are not summarized.

"Such summary may be transmitted together with such consumer's billing or in such other manner as the State regulatory authority or nonregulated electric utility deems appropriate.
- "(3) For purposes of the standard for information to consumers established by section 113(b)(3), each electric utility, on request of an electric consumer of such utility, shall transmit to such consumer a clear and concise statement of the actual consumption (or degree-day adjusted consumption) of electric energy by such consumer for each billing period during the prior year (unless such consumption data is not reasonably ascertainable by the utility)."

SPECIAL INSTRUCTIONS

Please complete the following questions regarding the consideration and determination of this standard. These questions are to be answered for each covered utility listed in 3.1 of Schedule 1. A "GENERIC" option has been provided to allow for reporting on multiple utilities covered in a generic consideration process for this standard. In the following space list the utility number of each utility covered under such a generic process.

o Utilities covered in a single generic consideration process for this standard:

1 _____	6 _____
2 _____	7 _____
3 _____	8 _____
4 _____	9 _____
5 _____	10 _____

Information to Consumers Standard

INSTRUCTIONS FOR COMPLETING QUESTION 1.0

A. Insert in the appropriate space for questions 1.1 and 1.2, the number from among the status codes provided below which most correctly reflects the status of each utility for this standard.

Status Codes:

0. Consideration process not begun.
1. Hearing scheduled.
2. Consideration process started but hearing not completed
3. Hearing completed
4. Official determination made to adopt or implement standard.
5. Official determination made to not adopt or implement standard.
6. Judicial review of determination to adopt or implement standard is pending.
7. Judicial review of determination to not adopt or implement standard is pending.
8. Standard put into effect by utility(ies).
9. Standard implemented and subsequently discontinued..

B. If the status code for any utility is designated as 0, 1 or 2 in question 1.1, complete only 1.1 and 1.2 of this schedule for such utility.

C. If the status code for any utility is designated as 3 in question 1.1, answer only questions 1.1, 1.2, 4.1, 4.2, 4.3, 4.4 and 4.5 of this schedule for such utility.

D. Complete question 1.3 by attaching a copy of each determination made and/or order issued and by designating the number of the attachment provided.

1.0 What is the status of your consideration process for each utility listed in questions 3.1 (a) and (b) of schedule 1:  
 (a) as of the end of the reporting period, and (b) as of November 9, 1978?

	Utility															
	Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1.1	Status as of end of reporting period															
1.2	Status as of Nov. 9, 1978															
1.3	Attachment Number															
1.4	Number of customers covered by order (in thousands):															
	• Residential															
	• Industrial															
	• Commercial															
	• Other (Specify) _____															

Information to Consumers Standard

	Utility															
	Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1.5 Sales in preceding year of customers covered by this order (in thousands of dollars)																
• Residential																
• Industrial																
• Commercial																
Other (specify) _____																

INSTRUCTIONS FOR COMPLETING QUESTION 2.0

- A. Answer question 2.0 for each utility whose status code is:
- 4-9 for the answer to question 1.1 of this schedule; and
  - 4-9 for the answer to question 1.2 of this schedule.
- B. Answer question 2.0 by using the following code:
- Y = yes            N = no

	Utility															
	Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
2.0 In your opinion, have your proceedings and actions substantially conformed to the requirements of Title I (or III) of PURPA for this standard																

INSTRUCTIONS FOR COMPLETING QUESTION 3.0

- A. Answer question 3.0 for each utility whose status is:
- 4-9 for the answer to question 1.1 of this schedule; and
  - 1, 2, or 3 for the answer to question 1.2 of this schedule
- B. Answer question 3.0 by using the following code:
- Y = yes            N = no



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Schedule 10  
Information to Consumers Standard

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
4.5	Testimony or other evidence taken																
4.6	Determination made that it is appropriate to implement this standard to carry out the purposes of PURPA																
4.7	Determination made that it is appropriate not to implement this standard to carry out the purposes of PURPA																
4.8	Decision rendered based upon findings included in such determination and evidence presented during hearing																
4.9	Proposed or interim written determination																
4.10	Final written determination																
4.11	Determination made available to public																
4.12	Total No. of intervenors compensated *																
4.13	Total dollar amount paid to intervenors *																
4.14	Conservation of energy supplied by electric or gas utility **																
4.15	Optimization of the efficiency of use of facilities and resources by electric or gas utility **																
4.16	Equitable rates to electric or gas consumers **																

\* See instruction "C" to this question  
\*\* See instruction "D" to this question











## Schedule 11

## Procedures for Termination of Electric (Gas) Service Standard

Introduction

Section 113(b)(4) (for electric) and section 303(b)(1) (for natural gas) of PURPA establish the Termination of Service Standard which states: "No electric (gas) utility may terminate electric (natural gas) service to any electric (gas) consumer except pursuant to procedures described in section 115(g)/304(a)."

Sections 115(g)/304(a) state: "The procedures for termination of service referred to in section 113(b)(4)/303(b)(1) are procedures prescribed by the State regulatory authority (with respect to electric (gas) utilities for which it has rate-making authority) or by the nonregulated utility which provide that--

- "(1) no electric (gas) service to an electric (gas) consumer may be terminated unless reasonable prior notice (including notice of rights and remedies) is given to such consumer and such consumer has a reasonable opportunity to dispute the reasons for such termination, and
  - "(2) during any period when termination of service to an electric (gas) consumer would be especially dangerous to health, as determined by the State regulatory authority (with respect to an electric (gas) utility for which it has ratemaking authority) or nonregulated electric (gas) utility, and such consumer establishes that--
    - "(A) he is unable to pay for such service in accordance with the requirements of the utility's billing, or
    - "(B) he is able to pay for such service but only in installments,
- "such service may not be terminated.

"Such procedures shall take into account the need to include reasonable provisions for elderly and handicapped consumers."

SPECIAL INSTRUCTIONS

Please complete the following questions regarding the consideration and determination of this standard. These questions are to be answered for each covered utility listed in 3.1 of Schedule 1. A "GENERIC" option has been provided to allow for reporting on multiple utilities covered in a generic consideration process for this standard. In the following space list the utility number of each utility covered under such a generic process.

o Utilities covered in a single generic consideration process for this standard:

1 _____	6 _____
2 _____	7 _____
3 _____	8 _____
4 _____	9 _____
5 _____	10 _____



Schedule 11

Procedures for Termination of Electric (Gas) Service Standard

	Generic	Utility														
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1.5	Sales in preceding year of customers covered by this order (in thousands of dollars)															
	• Residential															
	• Industrial															
	• Commercial															
	Other (specify) _____															

INSTRUCTIONS FOR COMPLETING QUESTION 2.0

- A. Answer question 2.0 for each utility whose status code is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 4-9 for the answer to question 1.2 of this schedule.
- B. Answer question 2.0 by using the following code:
- Y = yes            N = no

	Generic	Utility														
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
2.0	In your opinion, have your proceedings and actions substantially conformed to the requirements of Title I (or III) of PURPA for this standard															

INSTRUCTIONS FOR COMPLETING QUESTION 3.0

- A. Answer question 3.0 for each utility whose status is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 1, 2, or 3 for the answer to question 1.2 of this schedule
- B. Answer question 3.0 by using the following code:
- Y = yes            N = no



Schedule 11

Procedures for Termination of Electric (Gas) Service Standard

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		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
4.5	Testimony or other evidence taken																
4.6	Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA																
4.7	Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA																
4.8	Decision rendered based upon findings included in such determination and evidence presented during hearing																
4.9	Proposed or interim written determination																
4.10	Final written determination																
4.11	Determination made available to public																
4.12	Total No. of intervenors compensated *																
4.13	Total dollar amount paid to intervenors *																
4.14	Conservation of energy supplied by electric or gas utility **																
4.15	Optimization of the efficiency of use of facilities and resources by electric or gas utility **																
4.16	Equitable rates to electric or gas consumers **																

\* See instruction "C" to this question  
\*\* See instruction "D" to this question













Schedule 12

Advertising Standard

Introduction

Section 113(b)(5) (for electric) and section 303(b)(2) (for natural gas) of PURPA establish the Advertising Standard which states: " No electric (gas) utility may recover from any person other than the shareholders (or other owners) of such utility any direct or indirect expenditure by such utility for promotional or political advertising as defined in section 115(h)/304(b)."

Sections 115(h)/304(b) state:

"(1) For purposes of this section and section 113(b)(5)/303--

- "(A) The term 'advertising' means the commercial use, by an electric (gas) utility, of any media, including newspaper, printed matter, radio, and television, in order to transmit a message to a substantial number of members of the public or to such utility's electric (gas) consumers.
- "(B) The term 'political advertising' means any advertising for the purpose of influencing public opinion with respect to legislative, administrative, or electoral matters, or with respect to any controversial issue of public importance.
- "(C) The term 'promotional advertising' means any advertising for the purpose of encouraging any person to select or use the service or additional service of an electric (gas) utility or the selection or installation of any appliance or equipment designed to use such utility's service.

"(2) For purposes of this subsection and section 113(b)(5)/303, the terms 'political advertising' and 'promotional advertising' do not include--

- "(A) advertising which informs electric (natural gas) consumers how they can conserve energy (natural gas) or can reduce peak demand for electric energy (natural gas),
- "(B) advertising required by law or regulation, including advertising required under part 1 of title II of the National Energy Conservation Policy Act,
- "(C) advertising regarding service interruptions, safety measures, or emergency conditions,
- "(D) advertising concerning employment opportunities with such utility,
- "(E) advertising which promotes the use of energy efficient appliances, equipment or services, or
- "(F) any explanation or justification of existing or proposed rate schedules, or notifications of hearings thereon."

SPECIAL INSTRUCTIONS

Please complete the following questions regarding the consideration and determination of this standard. These questions are to be answered for each covered utility listed in 3.1 of Schedule 1. A "GENERIC" option has been provided to allow for reporting on multiple utilities covered in a generic consideration process for this standard. In the following space list the utility number of each utility covered under such a generic process.

o Utilities covered in a single generic consideration process for this standard:

1 _____	6 _____
2 _____	7 _____
3 _____	8 _____
4 _____	9 _____
5 _____	10 _____



Advertising Standard

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1.5	Sales in preceding year of customers covered by this order (in thousands of dollars)																
	• Residential																
	• Industrial																
	• Commercial																
	Other (specify) _____																

**INSTRUCTIONS FOR COMPLETING QUESTION 2.0**

- A. Answer question 2.0 for each utility whose status code is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 4-9 for the answer to question 1.2 of this schedule.
- B. Answer question 2.0 by using the following code:
- Y = yes            N = no

		Utility															
		Generic	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
2.0	In your opinion, have your proceedings and actions substantially conformed to the requirements of Title I (or III) of PURPA for this standard																

**INSTRUCTIONS FOR COMPLETING QUESTION 3.0**

- A. Answer question 3.0 for each utility whose status is:
1. 4-9 for the answer to question 1.1 of this schedule; and
  2. 1, 2, or 3 for the answer to question 1.2 of this schedule
- B. Answer question 3.0 by using the following code:
- Y = yes            N = no



ERA Form 166  
Form Approved  
OMB No. 018-RO422  
Exp. 12-82

Advertising Standard

	Generic	Utility															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
4.5	Testimony or other evidence taken																
4.6	Determination made that it is appropriate to implement this standard to carry out the 3 purposes of PURPA																
4.7	Determination made that it is appropriate not to implement this standard to carry out the 3 purposes of PURPA																
4.8	Decision rendered based upon findings included in such determination and evidence presented during hearing																
4.9	Proposed or interim written determination																
4.10	Final written determination																
4.11	Determination made available to public																
4.12	Total No. of intervenors compensated *																
4.13	Total dollar amount paid to intervenors *																
4.14	Conservation of energy supplied by electric or gas utility **																
4.15	Optimization of the efficiency of use of facilities and resources by electric or gas utility **																
4.16	Equitable rates to electric or gas consumers **																

\* See instruction "C" to this question  
\*\* See instruction "D" to this question











## List of Utility Codes

## ELECTRIC UTILITIES - INVESTOR-OWNED

<u>Name of Company</u>	<u>Code</u>
Alabama Power Company	000195
Appalachian Power Company (VA)	000733
Appalachian Power Company (WV)	000722
Arizona Public Service Company	000803
Arkansas-Missouri Power Company (AR)	000821
Arkansas-Missouri Power Company (MO)	000815
Arkansas Power & Light Company	000814
Atlantic City Electric Company	000963
Baltimore Gas & Electric Company	001167
Bangor Hydro-Electric Company	001179
Black Hills Power & Light Company (SD)	019545
Black Hills Power & Light Company (WY)	001415
Blackstone Valley Electric Company	001796
Boston Edison Company	001998
Brockton Edison Company	002267
Cambridge Electric Light Company	002886
Carolina Power & Light Company (NC)	003046
Carolina Power & Light Company (SC)	003059
Central Hudson Gas & Electric Corporation	003249
Central Illinois Light Company	003252
Central Illinois Public Service Company	003253
Central Louisiana Electric Company	003265
Central Maine Power Company	003266
Central Power & Light Company	003278
Central Telephone & Utilities Corporation (CO)	003286
Central Telephone & Utilities Corporation (KS)	003285
Central Vermont Public Service Corporation	003292
Cincinnati Gas & Electric Company	003542
Cleveland Electric Illuminating Company	003755
Columbus and Southern Ohio Electric Company	004062
Commonwealth Edison Company (IL)	004110
Community Public Service Company	004116
Connecticut Light & Power Company	004176
Consolidated Edison Company of New York	004226
Consumers Power Company	004254
CP National Corporation (CA)	002837
CP National Corporation (NV)	002845
CP National Corporation (OR)	002846
CP National Corporation (UT)	002847
Dallas Power & Light Company	004737
Dayton Power & Light Company	004922
Delmarva Power & Light Company (DE)	005027
Delmarva Power & Light Company of Maryland	005029
Delmarva Power & Light Company of Virginia	005032
Detroit Edison Company	005109

## List of Utility Codes (cont.)

## ELECTRIC UTILITIES -INVESTOR-OWNED (cont.)

<u>Name of Company</u>	<u>Code</u>
Duke Power Company (NC)	005416
Duke Power Company (SC)	005447
Duquesne Light Company	005475
El Paso Electric Company (NM)	005657
El Paso Electric Company (TX)	005701
Empire District Electric Company (KS)	005907
Empire District Electric Company (MS)	005860
Empire District Electric Company (OK)	005917
Fall River Electric Light Company	006166
Florida Power Corporation	006455
Florida Power & Light Company	006452
Georgia Power Company	007140
Green Mountain Power Corporation	007601
Gulf Power Company	007801
Gulf States Utilities Company (LA)	007807
Gulf States Utilities Company (TX)	007806
Hartford Electric Light Company	008211
Hawaiian Electric Company, Inc.	008287
Houston Lighting & Power Company	008901
Idaho Power Company (ID)	009191
Idaho Power Company (OR)	009205
Illinois Power Company	009208
Indiana & Michigan Electric Company (IN)	009249
Indiana & Michigan Electric Company (MI)	009271
Indianapolis Power & Light Company	009273
Interstate Power Company (IA)	009392
Interstate Power Company (IL)	009332
Iowa Electric Light & Power Company	009423
Iowa-Illinois Gas & Electric Company (IA)	009438
Iowa-Illinois Gas & Electric Company (IL)	009437
Iowa Power & Light Company	009429
Iowa Public Service Company	009435
Iowa Southern Utilities Company	009432
Jersey Central Power & Light Company	009726
Kansas City Power & Light Company (KS)	010011
Kansas City Power & Light Company (MO)	010000
Kansas Gas & Electric Company	010005
Kansas Power & Light Company	010015
Kentucky Power Company	022053
Kentucky Utilities Company	010171
Kingsport Power Company	010334
Lake Superior District Power Company (MI)	010591
Lake Superior District Power Company (WI)	010615
Long Island Lighting Company	011172
Louisiana Power & Light Company	011241

## List of Utility Codes (cont.)

## ELECTRIC UTILITIES - INVESTOR-OWNED (cont.)

<u>Name of Company</u>	<u>Code</u>
Louisville Gas & Electric Company	011249
Madison Gas & Electric Company	011479
Massachusetts Electric Company	011804
Metropolitan Edison Company	012390
Minnesota Power & Light Company	012647
Mississippi Power Company	012686
Mississippi Power & Light Company	012685
Missouri Edison Company	012693
Missouri Power & Light Company	012696
Missouri Public Service Company	012698
Missouri Utilities Company	012701
Monongahela Power Company (OH)	012791
Monongahela Power Company (WV)	012796
Montana-Dakota Utilities Company (MT)	012820
Montana-Dakota Utilities Company (ND)	012819
Montana-Dakota Utilities Company (SD)	012823
Montana-Dakota Utilities Company (WY)	012824
Montana Power Company	012825
Narrangansett Electric Company	013212
Nevada Power Company	013407
New Bedford Gas & Edison Light Company	013415
New Mexico Electric Service Company	013474
New Orleans Public Service, Inc.	013478
New York State Electric & Gas Corporation	013511
Niagara Mohawk Power Corporation	013573
Northern Indiana Public Service Company	013756
Northern States Power Company (MN)	013781
Northern States Power Company (ND)	013778
Northern States Power Company (SD)	013779
Northern States Power Company (WI)	013780
Northwestern Public Service Company	013809
Ohio Edison Company	013998
Ohio Power Company	014006
Oklahoma Gas & Electric Company	014063
Old Dominion Power Company	014084
Orange & Rockland Utilities	014154
Otter Tail Power Company	014232
Pacific Gas & Electric Company	014328
Pacific Power & Light Company (CA)	014326
Pacific Power & Light Company (ID)	014327
Pacific Power & Light Company (MT)	014329
Pacific Power & Light Company (OR)	014356
Pacific Power & Light Company (WA)	014331
Pacific Power & Light Company (WY)	014332

## List of Utility Codes (cont.)

## ELECTRIC UTILITIES - INVESTOR-OWNED (cont.)

<u>Name of Company</u>	<u>Code</u>
Pennsylvania Electric Company	014711
Pennsylvania Power & Light Company	014715
Pennsylvania Power Company	014716
Philadelphia Electric Company	014940
Portland General Electric Company	015248
Potomac Edison Company (MD)	015263
Potomac Edison Company (VA)	015266
Potomac Edison Company (WV)	015265
Potomac Electric Power Company (DC)	015270
Potomac Electric Power Company (MD)	015268
Public Service Company of Colorado	015466
Public Service Company of Indiana	015470
Public Service Company of New Hampshire	015475
Public Service Company of New Mexico	015473
Public Service Company of Oklahoma	015474
Public Service Electric and Gas Company	015478
Puget Sound Power & Light Company	015500
Rochester Gas & Electric Corporation	016183
Rockland Electric Company	016213
St. Joseph Light & Power Company	017881
San Diego Gas & Electric Company	016609
Savannah Electric & Power Company	016687
Sierra Pacific Power Company (CA)	017161
Sierra Pacific Power Company (NV)	017166
South Carolina Electric & Gas Company	017539
Southern California Edison Company	017609
Southern Indiana Gas & Electric Company	017633
Southwestern Electric Power Company (AR)	017676
Southwestern Electric Power Company (LA)	017698
Southwestern Electric Power Company (TX)	017735
Southwestern Electric Service Company	017699
Southwestern Public Service Company (NM)	017528
Southwestern Public Service Company (OK)	017536
Southwestern Public Service Company (TX)	017718
Tampa Electric Company	018454
Texas Electric Service Company	018729
Texas Power & Light Company	018763
Toledo Edison Company	018997
Tucson Gas & Electric Company	019259
UGI-Luzerne Electric Division	019452
Union Electric Company (IA)	019656
Union Electric Company (IL)	019655
Union Electric Company (MO)	019436

## List of Utility Codes (cont.)

## ELECTRIC UTILITIES - INVESTOR-OWNED (cont.)

<u>Name of Company</u>	<u>Code</u>
Union Light, Heat & Power Company	019946
United Illuminating Company	019497
Upper Peninsula Power Company	019578
Utah Power & Light Company (ID)	019666
Utah Power & Light Company (UT)	019659
Utah Power & Light Company (WY)	019661
Virginia Electric & Power Company (NC)	019868
Virginia Electric & Power Company (VA)	019876
Virginia Electric & Power Company (WV)	019875
Washington Water Power Company (ID)	020145
Washington Water Power Company (WA)	020169
West Penn Power Company	020387
West Texas Utilities Company	020404
Western Massachusetts Electric Company	020455
Wheeling Electric Company	020521
Wisconsin Electric Power Company (MI)	020161
Wisconsin Electric Power Company (WI)	020847
Wisconsin Power & Light Company	020856
Wisconsin Public Service Corporation (MI)	020166
Wisconsin Public Service Corporation (WI)	020860

## List of Utility Codes (cont.)

## ELECTRIC UTILITIES - PUBLICLY-OWNED

<u>Name of Company</u>	<u>Code</u>
Albany Water, Gas & Light Commission	000230
Anaheim-Electrical Division	000590
Austin Electric Department	001015
Bristol Electric System (TN)	002247
Burbank Public Service Department	002507
Central Lincoln People's Utility District (OR)	003264
Chattanooga Electric Power Board	003408
Clarksville Department of Electricity (TN)	003704
Clatskanie People's Utility District (OR)	028541
Cleveland Division of Light & Power (OH)	003762
Cleveland Utilities (TN)	003758
Colorado Springs Department of Public Utilities	003989
Decatur Electric Department (AL)	004958
Detroit Public Lighting Department	005107
Eugene Water & Electric Board (OR)	006022
Fayetteville Public Works Commission (NC)	006235
Florence Electricity Department (AL)	006422
Gainesville-Alachua County Regional Electric, Water, and Sewer Utilities Board (FL)	006909
Garland Electric Department	006958
Glendale Public Service Department (CA)	007294
Greenville Light & Power System (TN)	007625
Greenville Utilities Commission (NC)	007639
Huntsville Utilities (AL)	009094
Imperial Irrigation District (CA)	009216
Independence Power & Light Department (MO)	009231
Jackson Utility Division-Electric Department (TN)	009612
Jacksonville Electric Authority (FL)	009617
Johnson City Power Board (TN)	009777
Kansas City Board of Public Utilities (KS)	009996
Knoxville Utility Board (TN)	010421
Lafayette Utility System (LA)	009006
Lakeland Department of Electricity and Water (FL)	010623
Lansing Board of Water & Light (MI)	010704
Lincoln Electric System (NB)	011018
Los Angeles Department of Water and Power	011208
Lower Colorado River Authority	011269
Lubbock Power & Light (TX)	011292
Memphis Light, Gas & Water Division (TN)	012293
Modesto Irrigation District (CA)	012745
Muscatine Power & Water (IA)	013143
Nashville Electric Service (TN)	013216
Nebraska Public Power District	013337
Omaha Public Power District	014123

## List of Utility Codes (cont.)

## ELECTRIC UTILITIES - PUBLICLY-OWNED (cont.)

<u>Name of Company</u>	<u>Code</u>
Orlando Utilities Commission (FL)	014186
Palo Alto Electric Utility (CA)	014401
Pasadena Water & Power Department (CA)	014524
Power Authority of New York	015296
Port Angeles Light & Water Department (WA)	015231
Public Utility District No. 1 of Benton County (WA)	001579
Public Utility District No. 1 of Chelan County (WA)	003413
Public Utility District No. 1 of Clark County (WA)	003660
Public Utility District No. 1 of Cowlitz County (WA)	004442
Public Utility District of Franklin County (WA)	006716
Public Utility District of Grant County (WA)	007504
Public Utility District No. 1 of Grays Harbor County (WA)	007548
Public Utility District No. 1 of Lewis County (WA)	010944
Public Utility District No. 1 of Snohomish County (WA)	017470
Puerto Rico Water Resources Authority	015497
Richmond Power & Light (IN)	015989
Riverside Public Utilities (CA)	016088
Rocky Mount Public Utilities (NC)	016226
Sacramento Municipal Utility District (CA)	016534
Salt River Project Agricultural Improvement and Power District (AZ)	016572
San Antonio Public Service Board (TX)	016604
San Francisco Public Utilities Commission	016614
Santa Clara Electric Department (CA)	016655
Seattle City Light Department (WA)	016868
South Carolina Public Service Authority	017541
Springfield City Utilities (MO)	017833
Springfield Utilities Board (OR)	017839
Springfield Water, Light & Power Department (IL)	017828
Tacoma Public Utilities-Light Division (WA)	018429
Taunton Municipal Lighting Plant (MA)	018488
Tallahassee, City of (FL)	018445
Turlock Irrigation District (CA)	019281
Vernon Municipal Light Department (CA)	019798
Wilson Utilities Department (NC)	020785

## List of Utility Codes (cont.)

## GAS UTILITIES - INVESTOR-OWNED

<u>Name of Company</u>	<u>Code</u>
Alabama Gas Corporation	000190
Alaska Gas & Service Company	028542
Anadarko Production Company	000587
Arizona Public Service Company	000803
Arkansas-Louisiana Gas Company	000810
Arkansas-Oklahoma Gas Company	000813
Arkansas Western Gas Company	000819
Atlanta Gas Light Company	000959
Baltimore Gas & Electric Company	001167
Bay State Gas Company	028543
Boston Gas Company	001999
Brooklyn Union Gas Company	002288
Cabot Corporation Utility Division	002733
Carnegie Natural Gas Company	008042
Carolina Pipeline Company	028544
Cascade Natural Gas Corporation	003139
Central Illinois Light Company	003252
Central Illinois Public Service Company	003253
Chattanooga Gas Company	003409
Cheyenne Light, Fuel and Power Company	003461
Cincinnati Gas and Electric Company	003542
Cities Service Gas Company (covered by NECPA only)	003575
City Gas Company of Florida	003628
Columbia Gas of Kentucky, Inc.	004017
Columbia Gas of New York, Inc.	004019
Columbia Gas of Ohio, Inc.	004020
Columbia Gas of Pennsylvania, Inc.	004022
Columbia Gas of Virginia, Inc.	004023
Columbia Gas of West Virginia, Inc.	004025
Connecticut Light & Power Company	004176
Connecticut Natural Gas Corporation	004181
Consolidated Edison Company of New York, Inc.	004226
Consolidated Gas Supply Corporation	004226
Consumers Power Company	004254
CP National Corporation (NV)	002845
CP National Corporation (OR)	002846
Dayton Power & Light Company	004922
Delmarva Power & Light Company (DE)	005027
East Ohio Gas Company	005579
Elizabethtown Gas Company	005765
Entex, Inc.	005922
Equitable Gas Company	005939
Florida Gas Company	006435
Gas Company of New Mexico	017655
Gas Light Company of Columbus	007003
Gas Service Company	028545
Greeley Gas Company	028546

## List of Utility Codes (cont.)

## GAS UTILITIES - INVESTOR-OWNED (cont.)

<u>Name of Company</u>	<u>Code</u>
Illinois Power Company	009208
Indiana Gas Company	009256
Inland Gas Company	009301
Inter City Gas Limited	009321
Intermountain Gas Company	028547
Interstate Power Company	009392
Iowa Electric Light & Power Company	009423
Iowa-Illinois Gas & Electric Company (IA)	009438
Iowa-Illinois Gas & Electric Company (IL)	009437
Iowa Power & Light Company	009429
Iowa Public Service Company	009435
Iowa Southern Utilities Company	009432
Kansas-Nebraska Natural Gas Company	010022
Kansas Power & Light Company	010011
Kokomo Gas & Fuel Company	010439
Laclede Gas Company Consolidated	010554
Lone Star Gas Company	001157
Long Island Lighting Company	011172
Louisiana Gas Service Company	011233
Louisville Gas & Electric Company	011249
Lowell Gas Company	011267
Madison Gas & Electric Company	011479
Michigan Consolidated Gas Company	021531
Michigan Gas Utilities Company	012430
Michigan Power Company	012433
Minnesota Gas Company	012643
Mississippi Valley Gas Company	012691
Missouri Public Service Company	012698
Mobile Gas Service Corporation	012739
Montana-Dakota Utilities Company	012820
Montana Power Company	012825
Mountain Fuel Supply Company	013043
Nashville Gas Company	013217
National Fuel Gas Distribution Corporation	013247
National Gas and Oil Company	013262
New Jersey Natural Gas Company	013459
New Orleans Public Service, Inc.	013478
New York State Electric & Gas Corporation	013511
Niagara Mohawk Power Corporation	013573
North Carolina Natural Gas Corporation	028548
North Central Public Service Company	013698
North Shore Gas Company	013729
Northern Illinois Gas Company	013755
Northern Indiana Public Service Company	013756
Northern Natural Gas Company	013767
Northern States Power Company (MN)	013781
Northern States Power Company (ND)	013778
Northern States Power Company (WI)	013780

## List of Utility Codes (cont.)

## GAS UTILITIES - INVESTOR-OWNED (cont.)

<u>Name of Company</u>	<u>Code</u>
North Penn Gas Company	013723
Northwest Natural Gas Company	013796
Northwestern Public Service Company	013809
Oklahoma Natural Gas Company	014070
Orange & Rockland Utilities	014157
Pacific Gas & Electric Company	014328
Panhandle Eastern Pipeline Company	014423
Pennsylvania Gas & Water Company	014713
Peoples Gas, Light and Coke Company	014767
Peoples Gas System	014770
Peoples Natural Gas Company	014772
Peoples Natural Gas Division of Northern Natural Gas Company	014774
Penn Fuel Gas, Inc.	014684
Philadelphia Electric Company	014940
Piedmont Natural Gas Company	015024
Pioneer Natural Gas Company	015080
Providence Gas Company	015442
Public Service Company of Colorado	015466
Public Service Company, Inc. of North Carolina	028549
Public Service Electric and Gas Company	015478
Rochester Gas & Electric Corporation	016183
San Diego Gas & Electric Company	016609
South Carolina Electric & Gas Company	017539
South Jersey Gas Company	028550
Southeastern Michigan Gas Company	017601
Southern California Gas Company	028551
Southern Connecticut Gas Company	028552
Southern Indiana Gas & Electric Company	017633
Southern Union Gas Company	031874
Southwest Gas Corporation	017677
Terre Haute Gas Corporation	028553
Tucson Gas & Electric Company	019259
T.W. Phillips Gas and Oil Company	028554
UGI Corporation	019390
Union Gas System	019442
Union Light, Heat & Power Company	019446
United Cities Gas Company	028555
Virginia Electric & Power Company	019876
Washington Gas Light Company	020149
Washington Natural Gas Company	020156
Washington Water Power Company (ID)	020145
Washington Water Power Company (WA)	020169
West Ohio Gas Company	020384
Western Kentucky Gas Company	020454
Wisconsin Fuel & Light Company	028556
Wisconsin Gas Company	020850
Wisconsin Natural Gas Company	020853
Wisconsin Power & Light Company	020856
Wisconsin Public Service Corporation (MI)	020166
Wisconsin Public Service Corporation (WI)	020860

## List of Utility Codes (cont.)

## GAS UTILITIES - PUBLICLY-OWNED

<u>Name of Company</u>	<u>Code</u>
Citizens Gas & Coke Utility (IN)	003602
City of Richmond, Virginia, Department of Public Utilities	015984
City Public Service Board (San Antonio)	016604
Colorado Springs Department of Public Utilities	003989
Long Beach Gas Department	028557
Memphis Light, Gas & Water Division	012293
Metropolitan Utilities District of Omaha	014127
Philadelphia Gas Works	014943
Springfield City Utilities (MO)	017833

## List of Utility Codes (cont.)

## RURAL ELECTRIC COOPERATIVES

<u>Name of Company</u>	<u>Code</u>
Appalachian Electric Cooperative	000727
Chugach Electric Association	003522
Clay Electric Cooperative	003757
Cumberland Electric Membership Corporation	004624
Duck River Electric Membership Corporation	005399
First Electric Cooperative Corporation	006342
Flint Electrical Membership Corporation	006411
Four County Electric Power Association	006641
Gibson County Electric Membership Corporation	007174
Green River Electric Corporation	007572
Henderson-Union Rural Electric Cooperative Corporation	008400
Jackson Electric Membership Corporation	009601
Lee County Electric Cooperative	010817
Meriwether Lewis Electric Cooperative	012330
Middle Tennessee Electric Membership Corporation	012470
Moon Lake Electric Association	012866
North Georgia Electric Membership Corporation	013716
Pendernales Electric Cooperative	014626
Pennyrile Rural Electric Cooperative Corporation	014724
Singing River Electric Power Association	017252
South Central Power Company	017548
Southern Maryland Electric Cooperative, Inc.	017637
Southern Pine Electric Power Association	017647
Southwest Louisiana Electric Membership Corporation	017684
Southwest Tennessee Electric Membership Corporation	017694
Tri-County Electric Membership Corporation	019162
Umatilla Electric Cooperative Association	019325
Upper Cumberland Electric Membership Corporation	019574
Volunteer Electric Cooperative	019898
Warren Rural Electric Cooperative	020130
West Kentucky Rural Electric Cooperative Cooperation	020377

## List of Utility Codes (cont.)

## FEDERAL AGENCIES

<u>Name of Company</u>	<u>Code</u>
Bonneville Power Administration	001738
Tennessee Valley Authority	018642
Western Area Power Administration	028501

CODES FOR  
PUBLIC UTILITY COMMISSIONS

Code

1. Alabama Public Service Commission
2. Alaska Public Utilities Commission
3. Arizona Corporation Commission
4. Arkansas Public Service Commission
5. California Public Utilities Commission
6. Colorado Public Utilities Commission
7. Connecticut Public Utilities Control Authority
8. Delaware Public Service Commission
9. Public Service Commission of the District of Columbia
10. Florida Public Service Commission
11. Georgia Public Service Commission
12. Hawaii Public Utilities Commission
13. Idaho Public Utilities Commission
14. Illinois Commerce Commission
15. Indiana Public Service Commission
16. Iowa Commerce Commission
17. Kansas State Corporation Commission
18. Kentucky Public Service Commission
19. Louisiana Public Service Commission
20. Maine Public Utilities Commission
21. Maryland Public Service Commission
22. Massachusetts Department of Public Utilities
23. Michigan Public Service Commission
24. Minnesota Department of Public Service
25. Mississippi Public Service Commission
26. Missouri Public Service Commission
27. Montana Public Service Commission
28. Nevada Public Service Commission
29. New Hampshire Public Utilities Commission
30. New Jersey Department of Energy, Board of Public Utilities
31. New Mexico Public Service Commission
32. New York Public Service Commission
33. North Carolina Utilities Commission
34. North Dakota Public Service Commission
35. Ohio Public Utilities Commission
36. Oklahoma Corporation Commission
37. Public Utility Commissioner of Oregon
38. Pennsylvania Public Utility Commission
39. Puerto Rico Public Service Commission
40. Rhode Island Public Utilities Commission
41. South Carolina Public Service Commission
42. South Dakota Public Utilities Commission
43. Tennessee Public Service Commission
44. Tennessee Valley Authority
45. Railroad Commission of Texas
46. Texas Public Utility Commission
47. Utah Public Service Commission
48. Virginia State Corporation Commission
49. Washington Utilities and Transportation Corporation
50. West Virginia Public Service Commission
51. Wisconsin Public Service Commission
52. Wyoming Public Service Commission

State	Authority	Date Received
<u>State Regulatory Authorities</u>		
Alabama	Alabama Public Service Commission	Oct. 31, 1979
Alaska	Alaska Public Utilities Commission	Nov. 14, 1979
Arkansas	Arkansas Public Service Commission	Nov. 21, 1979
Arizona	Arizona Corporation Commission	Nov. 14, 1979
California	California Public Utilities Commission	Nov. 9, 1979
Colorado	Colorado Public Utilities Commission	Nov. 6, 1979
Connecticut	Division of Public Utility Control	Nov. 6, 1979
Delaware	Delaware Public Service Commission	Nov. 14, 1979
District of Columbia	District of Columbia Public Service Commission	Nov. 23, 1979
Florida	Florida Public Service Commission	Nov. 14, 1979
Georgia	Georgia Public Service Commission	Nov. 8, 1979
Hawaii	Hawaii Public Utilities Commission	Nov. 8, 1979
Idaho	Idaho Public Utilities Commission	Oct. 30, 1979
Illinois	Illinois Commerce Commission	Nov. 6, 1979
Indiana	Indiana Public Service Commission	Nov. 6, 1979
Iowa	Iowa State Commerce Commission	Oct. 30, 1979
Kansas	Kansas State Corporation Commission	Nov. 13, 1979
Kentucky	Kentucky Energy Regulatory Commission	Oct. 26, 1979
Louisiana	Louisiana Public Service Commission	Oct. 23, 1979
Maine	Maine Public Utilities Commission	Nov. 14, 1979
Maryland	Maryland Public Service Commission	Nov. 14, 1979
Massachusetts	Massachusetts Department of Public Utilities	Nov. 20, 1979
Michigan	Michigan Public Service Commission	Nov. 16, 1979
Minnesota	Minnesota Department of Public Service	Nov. 16, 1979
Missouri	Missouri Public Service Commission	Nov. 8, 1979
Montana	Montana Public Service Commission	Nov. 8, 1979
Nevada	Nevada Public Service Commission	Nov. 8, 1979
New Hampshire	New Hampshire Public Utilities Commission	Nov. 19, 1979
New Jersey	New Jersey Board of Public Utilities	Nov. 19, 1979
New Mexico	New Mexico Public Service Commission	Nov. 27, 1979
New York	New York Public Service Commission	Nov. 14, 1979
North Carolina	North Carolina Public Utility Commission	Nov. 16, 1979
North Dakota	North Dakota Public Service Commission	Nov. 6, 1979
Ohio	Ohio Public Utilities Commission	Dec. 13, 1979
Oklahoma	Oklahoma Corporation Commission	Nov. 21, 1979
Oregon	Oregon Public Utilities Commission	Nov. 27, 1979
Pennsylvania	Pennsylvania Public Utility Commission	Nov. 9, 1979
Rhode Island	Rhode Island Public Utilities Commission	Nov. 9, 1979
South Carolina	South Carolina Public Service Commission	Nov. 14, 1979
South Dakota	South Dakota Public Utilities Commission	Nov. 14, 1979
Tennessee	Tennessee Public Service Commission	Nov. 7, 1979
	Tennessee Valley Authority	Nov. 14, 1979
Texas	Texas Public Utility Commission	Nov. 9, 1979
	Texas Railroad Commission	Nov. 14, 1979
Utah	Utah Public Service Commission	Nov. 9, 1979
Vermont	Vermont Public Service Board	Nov. 15, 1979
Virginia	Virginia State Corporation Commission	Jan. 29, 1980
Washington	Washington Utilities and Transportation Commission	Nov. 14, 1979
West Virginia	West Virginia Public Service Commission	Nov. 19, 1979
Wisconsin	Wisconsin Public Service Commission	Nov. 13, 1979
Wyoming	Wyoming Public Service Commission	Nov. 6, 1979

State	Authority	Date Received
<u>Electric Utilities (Nonregulated)</u>		
Alabama	City of Dothan	Nov. 14, 1979
California	Anaheim Public Utilities Department	Nov. 16, 1979
	Burbank Public Service Department	Nov. 13, 1979
	Glendale Public Service Department	Nov. 14, 1979
	Power Department, Imperial Irrigation District	Nov. 13, 1979
	Los Angeles Department of Water & Power	Oct. 25, 1979
	Modesto Irrigation District	Dec. 26, 1979
	Palo Alto Electric Utility	Nov. 20, 1979
	Pasadena Water & Power Department	Nov. 14, 1979
	Riverside Public Utility Department	Dec. 17, 1979
	Colorado	Colorado Springs Department of Public Utilities
Florida	Gainesville/Alachua County Regional Electric, Water & Sewer Utilities Board	Oct. 31, 1979
	Jacksonville Electric Authority	Nov. 2, 1979
	Lakeland Department of Electric and Water	Nov. 8, 1979
Georgia	Orlando Utilities Commission	Oct. 25, 1979
	Albany Water, Gas & Light Commission	Oct. 24, 1979
Iowa	Muscatina Power and Water	Nov. 13, 1979
Kansas	Kansas City Board of Public Utilities	Nov. 6, 1979
Louisiana	City of Lafayette	Mar. 3, 1980
	Department of Utilities, City of New Orleans	Nov. 13, 1979
Michigan	Lansing Board of Water and Light	Oct. 23, 1979
Missouri	City of Independence Power and Light Department	Nov. 9, 1979
Nebraska	Lincoln Electric System	Nov. 27, 1979
	Nebraska Public Power District	Nov. 16, 1979
	Omaha	Nov. 8, 1979
New York	New York Power Authority	Nov. 9, 1979
North Carolina	Fayetteville Public Works Commission	Nov. 6, 1979
	Greenville Utilities Commission	Nov. 13, 1979
Ohio	Cleveland Division of Light and Power	Nov. 14, 1979
Oregon	Central Lincoln People's Utility District	Nov. 21, 1979
	Clatskanie Peoples' Utility District	Oct. 15, 1979
	Eugene Water & Electric Board	Nov. 6, 1979
Pennsylvania	Philadelphia Gas Commission	Nov. 8, 1979
Puerto Rico	Puerto Rico Water Resources Authority	Nov. 3, 1979
Tennessee	Council of the City of Memphis	Nov. 14, 1979
Texas	Austin Electric Department	Nov. 14, 1979
	City of El Paso	Nov. 26, 1979
	Garland Electric Department	Nov. 27, 1979
	Lubbock Power & Light	Nov. 14, 1979
	Port Angeles Light Department	Nov. 14, 1979
Washington	Public Utility District No. 1 of Benton County	Nov. 14, 1979
	Public Utility District No. 1 of Chelan County	Nov. 6, 1979
	Public Utility District of Clark County	Nov. 14, 1979
	Public Utility District of Cowlitz County	Nov. 6, 1979
	Public Utility District No. 1 of Franklin County	Sept. 26, 1979
	Public Utility District of Grant County	Oct. 29, 1979
	Public Utility District No. 1 of Grays Harbor County	Nov. 8, 1979
	Public Utility District No. 1 of Lewis County	Nov. 14, 1979
	Public Utility District No. 1 of Snohomish County	Oct. 23, 1979

## Exhibit A.2 (continued)

FORM ERA-166s RECEIVED

State	Authority	Date Received
<u>Municipal Utilities</u>		
Arizona	Salt River Project Agricultural Improvement and Power District	Nov. 15, 1979
California	Sacramento Municipal Utility District	Dec. 11, 1979
	Santa Clara Electric Department	Nov. 14, 1979
	Turlock Irrigation District	Nov. 14, 1979
Florida	City of Tallahassee Electric Department	Oct. 10, 1979
Illinois	Springfield Water, Light & Power Department	Nov. 8, 1979
Missouri	Springfield City Utilities	Nov. 13, 1979
North Carolina	City of Wilson Utilities Department	Nov. 13, 1979
Oregon	Springfield Utility Board	Nov. 7, 1979
South Carolina	South Carolina Public Service Authority	Nov. 0, 1979
Texas	San Antonio City Public Service Board	Nov. 14, 1979
Washington	Seattle City Light Department	Nov. 8, 1979
	Tacoma Department of Public Utilities, Light Division	Nov. 7, 1979
<u>Gas Utilities (Nonregulated)</u>		
Iowa	Iowa Public Service Commission	Jan. 23, 1980
	Peoples Natural Gas Division of Northern Natural Gas Company	Nov. 8, 1979
Nebraska	Kansas-Nebraska Natural Gas Co., Inc.	Nov. 27, 1979
	Minnesota Gas Company - Cengas Division	Nov. 27, 1979
	Omaha Metropolitan Utilities District	Nov. 6, 1979
South Dakota	Northwestern Public Service Commission	Nov. 6, 1979
Virginia	Richmond, Virginia Department of Public Utilities	Oct. 29, 1979
<u>Cooperatives</u>		
Florida	Clay Electric Cooperative	Nov. 14, 1979
	Lee County Electric Cooperative	Nov. 14, 1979
Georgia	Flint Electric Membership Corporation	Nov. 6, 1979
	Jackson Electric Membership Corporation	Oct. 23, 1979
Louisiana	Southwest Louisiana Electric Membership Corporation	Nov. 8, 1979
Mississippi	Singing River Electric Power Association	Nov. 20, 1979
	Southern Pine Electric Power Association	Nov. 16, 1979
Ohio	South Central Power Company	Nov. 14, 1979
Oregon	Umatilla Electric Cooperative Association	Oct. 26, 1979
<u>Federal Systems</u>		
Colorado	Western Area Power Administration	Nov. 14, 1979
Oregon	Bonneville Power Administration	Nov. 13, 1979
Tennessee	Tennessee Valley Authority	Nov. 14, 1979

# Appendix B

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## NRRI NATIONAL CONFERENCES, WORKSHOPS, AND PUBLICATIONS

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### NRRI NATIONAL CONFERENCES

#### "The National Energy Act and its Impact on State Utility Regulation"

Purpose - To assist state regulatory commissions, state energy offices, and governors' offices in dealing with the National Energy Act and its implications.

- Columbus (OH) Conference - January 8-9, 1979
- Denver (CO) Conference - January 15-16, 1979
- Atlanta (GA) Conference - January 18-19, 1979
- Providence (RI) Conference - January 22-23, 1979
- San Francisco (CA) Conference - January 25-26, 1979

### NRRI NATIONAL WORKSHOPS

#### 1. "RAM Workshop"

Purpose -- To train state regulatory commission personnel in electric utility financial analysis and in the use of the Regulatory Analysis model (RAM), a financial analysis computer model.

- Columbus (OH) Workshop - February 5-8, 1979.
- Columbus (OH) Workshop - September 10-12 1979

#### 2. "Marginal Cost Pricing Workshop"

Purpose -- To train state regulatory commission personnel in the determination and application of marginal cost pricing in electric utility ratemaking.

- Columbus (OH) Workshop - August 28-29, 1979

NRRI NATIONAL CONFERENCES, WORKSHOPS, AND PUBLICATIONS

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3. "Time-of-Use Rates Workshop"

Purpose -- To train state regulatory commission personnel in the design of time-of-use electric rates using both the marginal cost and traditional costing methods.

Columbus (OH) Workshop - September 5-6, 1979

4. "Cost-of-Service Workshop"

Purpose -- To train state regulatory commission personnel in the calculation and allocation of the costs of providing electric service, and translation of those costs into rates.

Columbus (OH) Workshop - September 18-19, 1979

OTHER DOE NATIONAL WORKSHOP

"Regulatory Impact on Electric Utility Energy Efficiency"

Purpose -- To provide state regulatory commissioners and senior staff personnel with an overall understanding of the concepts and regulatory issues related to conservation voltage regulation, power factor improvement, distribution transformer life-cycle costing, and street lighting efficiency improvement.

Chicago (IL) Workshop - November 8-9, 1979

**PUBLICATIONS LIST**  
  
of the  
**NATIONAL REGULATORY RESEARCH INSTITUTE**

January 1980

**National Regulatory Research Institute**  
2130 Neil Avenue  
Columbus, Ohio 43210  
(614) 422-9404

The National Regulatory Research Institute's (NRRI) Publications List presents all reports published to date under NRRI's auspices. The bylaws of the National Regulatory Research Institute state that among the purposes of the Institute is:

. . . to carry out research and related activities directed to the needs of state regulatory commissioners, to assist the state commissions with developing innovative solutions to state regulatory problems, and to address regulatory issues of national concern.

Publication of this list is one method of ensuring a wide dissemination of this research.

All of the reports may be ordered directly from NRRI by using the order form found on the last page of this report.

The NRRI Publications List is updated periodically.

## CASE STUDIES

The case studies were prepared under a contract with the U.S. Department of Energy and describe innovative energy management and conservation activities undertaken by state regulatory commissions.

NRRI-78-1 ENERGY MANAGEMENT AND CONSERVATION IN ARKANSAS, December 1978

By Raymond Lawton, Julie Perone and, David Hall, NRRI; and Douglas E. Warns, Information Systems Center, Inc.

Analyzes and describes innovative approaches to energy management and conservation by a state regulatory commission and an investor-owned utility.

99 pages \$5.00

NRRI-78-2 CONTROLLING PIPELINE LOSS IN ARIZONA, December 1978

By Audeen Walters, NRRI; and Edward Rafferty, Jr., Information Systems Center, Inc.

Details methods used by a state regulatory commission to reduce the amount of gas loss by distribution companies.

30 pages \$4.00

NRRI-78-3 THE MISSOURI RATE REFORM INITIATIVE, December 1978

By Daniel Z. Czamanski, NRRI; and Abram E. Hoffman, Urban Systems Research and Engineering, Inc.

Describes the organizational changes undertaken by a state commission as it began electric rate reform.

72 pages \$4.75

NRRI-79-1 ENERGY MANAGEMENT AND CONSERVATION THROUGH PRICING INNOVATION IN WISCONSIN, January 1979

By Kenneth Pearlman and Patricia Stach, NRRI; and Alvin Kaufman and Russell Profozich, economic consultants

Traces the development of marginal-cost pricing and time-of-use pricing through a series of rate cases.

122 pages \$5.25

NRRI-79-2      UTILITY REGULATION AND THE LEGISLATIVE PROCESS IN  
OREGON, January 1979

By Richard J. Darwin, NRRI

Describes an innovative approach to energy conserva-  
tion by the state regulatory Commissioner and the  
involvement of the state legislature in this process.

103 pages      \$5.00

STUDY SPONSORED BY THE COLORADO PUBLIC UTILITIES COMMISSION

NRRI-79-4      COMPUTER ASSISTED REGULATORY ANALYSIS AND ITS POTENTIAL  
APPLICATION TO THE COLORADO PUBLIC UTILITIES COMMISSION,  
January 1979

By Mark Gerber and Karl McDermott, NRRI

Describes applications of computers and computer  
programs in regulation.

43 pages      \$4.50

STUDY SPONSORED BY THE VIRGINIA STATE CORPORATION COMMISSION

NRRI-79-39      DOCUMENTATION FOR THE VIRGINIA STATE CORPORATION  
COMMISSION'S PRODUCTION COST SIMULATION MODEL,  
October 1979

By Mark S. Gerber and Alan G. Thielke, NRRI

Describes a computer model designed to simulate  
system dispatch and calculate electricity production  
costs; developed by NRRI for the Virginia State  
Corporation Commission.

Vol. I, 159 pages      \$7.00  
Vol. II (appendices), 201 pages      \$7.75

OCCASIONAL PAPERS

Occasional papers represent regulatory research published by NRRI.

NRRI-79-8 ACCELERATED DEPRECIATION AND THE INVESTMENT TAX CREDIT  
IN THE PUBLIC UTILITY INDUSTRY, March 1979

By Donald W. Kiefer, consultant

Analyzes investment tax, and accelerated  
depreciation issues in the public utility industry.

103 pages \$11.00

NRRI-79-9 ELECTRIC SYSTEM LOAD PATTERNS AND DEMAND CHARGES, May 1979

By J. Stephen Henderson, The Ohio State University

Assesses economic efficiency of using time varying  
demand charges for electricity.

11 pages \$6.00

STUDIES SPONSORED BY THE PUBLIC UTILITIES COMMISSION OF OHIO

NRRI-75-1 ALTERNATIVE POLICIES FOR PRICING NONHISTORIC GAS, October  
1975

By Seymour Goldstone and Kevin Kelly, The Ohio State  
University

Considers roll-in versus incremental pricing of high  
cost gas for curtailed customers, as well as transfer  
of gas entitlements.

115 pages \$5.00

NRRI-75-2 OHIO'S FUEL ADJUSTMENT CLAUSE: AN ANALYSIS AND RECOM-  
MENDATIONS FOR CHANGE, November 1975

By Seymour Goldstone and Kevin Kelly, The Ohio State  
University

Analyzes the advantages and disadvantages of Ohio's  
clauses and recommends a uniform clause for all  
electric utilities.

134 pages \$5.50

- NRRI-76-1      LIFELINE RATES FOR ELECTRICITY AND NATURAL GAS, September  
1976
- By Kevin Kelly, James Devanney and Seymour Goldstone, The  
Ohio State University
- Considers the compatibility of lifeline proposals  
with the principles of sound utility rate design.
- 110 pages                      \$5.00
- NRRI-77-1      ELECTRICITY PRICING POLICIES FOR OHIO, July 1977
- By Daniel Czamanski, J. Stephen Henderson and Kevin Kelly,  
The Ohio State University
- Discusses the implementation of marginal cost based  
time of use rates, including the rational, the  
costing methods, tariff design and a phased imple-  
mentation plan.
- 2 vols., 268 pages      \$7.50
- NRRI-77-2      OHIO'S EMERGENCY PURCHASE, TRANSFER, AND SELF-HELP PROGRAMS,  
July 1977
- By Audeen Walters, Kevin Kelly and James Bydolek, The Ohio  
State University
- Evaluates three programs to provide natural gas to  
curtailed customers.
- 111 pages                      \$5.00
- NRRI-77-3      BENEFITS AND COSTS OF GAS STORAGE DEVELOPMENT IN OHIO,  
August 1977
- By Daniel Czamanski, J. Stephen Henderson and Kevin Kelly,  
The Ohio State University
- Develops a method for a cost-benefit analysis of  
gas storage and applies the method in an Ohio example.
- 116 pages                      \$5.25

NRRI-77-4

ELECTRIC UTILITY ANALYSIS PACKAGE: A SET OF COMPUTER PROGRAMS DESIGNED TO ASSIST IN THE ANALYSIS OF ELECTRIC OPERATIONS, October 1977

By S. Nakamura, Mark Gerber, D.W. Miller and Kevin Kelly,  
The Ohio State University

Includes programs developed at NRRI and programs modified by NRRI for state regulatory commission use.

332 pages \$8.75

NRRI-78-10

EVALUATING THE QUALITY OF TELEPHONE SERVICE, October 1978

By Clark Mount-Campbell, NRRI

Recommends a process design for testing compliance with quality standards and includes a summary report, computer programs specifications, and two testing procedures manuals.

113 pages \$5.00

NRRI-78-11

POLCA: A COMPUTER PROGRAM TO STUDY THE EFFECTS OF ENVIRONMENTAL CONTROL ON THE COST OF ELECTRICITY IN OHIO, October 1978

By S. Nakamura, NRRI

Reports on a versatile program designed for studies relating costs of alternate fuels, including alternate sulfur levels in coal, scrubber costs, and reliability levels to air and water emissions standards.

291 pages \$8.00

NRRI-78-15

ALLOCATION OF INCREASING GAS SUPPLIES IN OHIO, November 1978

By Daniel Czamanski and J.M. Guldman, NRRI

Develops a Regulatory Simulation Model to forecast the probable outcomes of alternate policies for a gas utility for allocating gas available to relieve curtailments and includes policy discussion, model description and data sources.

3 vols., 908 pages \$16.50

NRRI-79-32

ALTERNATE COAL CONVERSION TECHNOLOGIES, November 1979

By Robert H. Essenhigh, The Ohio State University

Discusses guidelines for state utility regulatory agencies faced with proposals from electric and gas utilities for investing in the conversion of coal to fuel oils and gasses; considers technological limitations, chemical aspects, time and physical scales, and reliability of estimates.

96 pages \$5.50

NRRI-79-38

THE IMPACT OF MEASURED TELEPHONE RATES ON TELEPHONE USAGE BY GOVERNMENT AND NON-PROFIT ORGANIZATIONS  
October 1979

By Allen G. Buckalew, NRRI and  
Clark Mount-Campbell, The Ohio State University

Examines the effect of measured rate versus flat rate telephone billing for governmental agencies and non-profit organizations.

150 pages \$6.75

NRRI-79-40

A USERS MANUAL FOR MARGINAL COST, A COMPUTER PROGRAM DEVELOPED BY CHARLES J. CICCHETTI

By Stephen N. Storch, The Ohio State University

Assists in the adaptation of the Cicchetti computer program to compute long run marginal cost of electricity with some modifications for specific applications.

90 pages \$5.50

STUDIES PREPARED FOR THE OHIO ENERGY CREDITS ADVISORY COMMITTEE

NRRI-79-10

ALTERNATIVES TO THE OHIO ENERGY CREDITS PROGRAM

By Kevin Kelly, David Duran, and Myra Adelman, NRRI

Discusses advantages and disadvantages of programs to assist low-income persons with their energy bills, including direct aid, utility pricing policies and weatherization.

50 pages \$4.50

TECHNICAL ASSISTANCE REPORTS

The technical assistance reports were prepared under a contract with the U.S. Department of Energy. Each report was developed for a specific state and analyzes an issue proposed by the state regulatory commission. Although each report is state-specific, it is believed that the issues examined make the reports worthy of wide dissemination.

NRRI-78-5      COLORADO POWER POOLING AND GENERATION DISPATCH STRATEGIES,  
August 1978

By Whitfield A. Russell and Associates, Inc.

Analyzes existing and planned operating procedures and power pooling arrangements of electric utilities in Colorado.

65 pages                      \$4.50

NRRI-78-6      DETERMINATION OF THE MARGINAL COSTS OF PROVIDING SERVICE  
ON THE DELMARVA POWER & LIGHT COMPANY SYSTEM AND THE  
CONVERSION OF MARGINAL COSTS INTO RATES, August 1978

By J.W. Wilson and Associates, Inc.

Analyzes and develops marginal cost rates in Delaware.

147 pages                      \$5.50

NRRI-78-7      APPROACH TO SETTING COST-BASED ELECTRIC RATES IN NEVADA,  
September 1978

By Resource Planning Associates, Inc.

Provides background for the evaluation and selection of appropriate cost of service methodologies for use in Nevada.

36 pages                      \$4.50

NRRI-78-8      EVALUATION OF ALTERNATE RATE STRUCTURES FOR PHILADELPHIA  
GAS WORKS, September 1978

By Jerome Hass, Robert Smiley and Richard Curtis, Cornell University

Examines the impact of alternate rate structures.

57 pages                      \$4.50

- NRRI-78-9            COSTING AND RATE DESIGN METHODOLOGIES FOR ELECTRIC UTILITIES, September 1978
- By J.W. Wilson and Associates, Inc.
- Develops an embedded cost of service method, a marginal cost of service method, a lifeline analysis and an analysis of streetlighting costs for the Rhode Island Public Utilities Commission.
- 315 pages            \$8.00
- NRRI-78-13            A DEMONSTRATION OF THE MARGINAL COST APPROACH TO TIME OF USE PRICING OF ELECTRIC SERVICE, October 1978
- By CH2M Hill
- Explains a method for implementing the NERA approach to calculating marginal costs for the Idaho Public Utilities Commission.
- 63 pages            \$4.50
- NRRI-78-14            APPROACH TO DEVELOPING ELECTRICITY PRICING AND LOAD MANAGEMENT PROGRAMS IN MARYLAND, October 1978
- By Resource Planning Associates, Inc.
- Analysis of various pricing and load management options.
- 90 pages            \$4.75
- NRRI-78-17            TECHNICAL ASSISTANCE IN THE DEVELOPMENT OF A JOINT NORTH AND SOUTH CAROLINA ELECTRICITY DEMAND FORECASTING MODEL, December 1978
- By Charles River Associates, Inc.
- Reports on the development of a model for long-range electric peak load forecasting.
- 18 pages            \$4.50
- NRRI-79-6            THE DEVELOPMENT OF A COMPUTERIZED REGULATORY INFORMATION AND ANALYSIS SYSTEM FOR THE ARIZONA CORPORATION COMMISSION, March 1979
- By Dewey Ray, consultant
- Outlines the procedures for the development and implementation of a computerized regulatory information system.
- 30 pages            \$4.50

NRRI-79-12

REVIEW OF RATE STRUCTURES FOR WASHINGTON INVESTOR-OWNED  
ELECTRIC UTILITIES, September 1979

By Economic and Engineering Services, Inc.

Reviews for the Washington Utilities and Transportation Commission the existing rate structures of three investor-owned electric utilities in terms of cost-of-service, energy conservation, and allocational efficiency criteria.

85 pages \$5.50

NRRI-79-13

REVIEW AND EVALUATION OF A PROPOSED POWER COST ADJUSTMENT  
FOR THE LINCOLN ELECTRIC SYSTEM, September 1979

By J.W. Wilson and Associates, Inc.

Reviews a proposed power cost adjustment clause for a Nebraska municipal system and sets forth considerations which may serve to improve its implementation and operation.

41 pages \$4.50

NRRI-79-14

INNOVATIVE RATES FOR GENERAL SERVICE CUSTOMERS OF THE  
CENTRAL MAINE POWER COMPANY, September 1979

By Resource Planning Associates, Inc.

Evaluates the rates filed by Central Maine Power Company and recommends specific improvements.

27 pages \$4.50

NRRI-79-15

AN EVALUATION OF THE FUEL ADJUSTMENT CLAUSE OF THE  
ALABAMA POWER COMPANY, September 1979

By J.W. Wilson and Associates, Inc.

Assesses a fuel adjustment clause submitted by the Alabama Power Company to the Alabama Public Service Commission.

64 pages \$5.50

NRRI-79-16

THE NEW MEXICO COST OF SERVICE INDEX, AN EFFORT IN  
REGULATORY INNOVATION, August 1979

by Alvin Kaufman and Russell Profozich,  
consulting economists

Reviews the New Mexico cost of service index and  
assesses its financial impact, regulatory effect  
and relationship to a utility's rate of return.

86 pages

\$4.75

NRRI-79-17

A METHOD TO ASSESS THE ECONOMIC FEASIBILITY OF TIME-OF-DAY  
PRICING FOR RESIDENTIAL CUSTOMERS, September 1979

By CH2M Hill

Develops for the New York Department of Public  
Service a method to determine the economic  
feasibility of adopting time-of-day pricing in  
the sale of electricity to residential customers.

82 pages

\$4.75

NRRI-79-20

A COMPUTERIZED ANALYSIS OF TIME-OF-USE RATES FOR  
MASSACHUSETTS, July 1979

By Abram E. Hoffman, Acumenics and  
Daniel F. Czamanski, NRRI

Develops a method to assess the costs and benefits  
of time-of-use rates for Massachusetts and presents  
computer programs used in the analysis.

36 pages

\$4.35

NRRI-79-21

UNIFORM ELECTRIC AND GAS ADJUSTMENT CLAUSES FOR THE  
ILLINOIS COMMERCE COMMISSION, September 1979

By Touche Ross and Company

Reports on the design of uniform electric and gas  
adjustment clauses and the development of a process  
to administer the uniform clauses.

130 pages

\$6.50

NRRI-79-22

MODIFICATIONS TO THE WIEN AUTOMATIC SYSTEM PLANNING PACKAGE (WASP) FOR IMPROVING POWER POOLING ANALYSIS, September 1979

By Dr. Shoichiro Nakamura and Spyridon Tzemos,  
The Ohio State University

Reports on modifications of the WASP electric utility expansion model which were undertaken for the Florida Public Service Commission to analyze options for statewide electric utility planning.

280 pages \$15.50

NRRI-79-25

APPROACH FOR CONSIDERING SELECTED RATEMAKING STANDARDS OF PURPA, September 1979

By Resource Planning Associates, Inc.

Provides guidelines and recommends steps to be taken by the Oklahoma Corporation Commission to meet the requirements of PURPA ratemaking standards.

59 pages \$5.50

NRRI-79-26

A MODEL FOR THE EVALUATION OF ENERGY ASSISTANCE AND LIFELINE PROGRAMS, October 1979

By David C. Sweet and Sara F. Larson,  
Cleveland State University

Provides recommendations to the New Jersey Board of Public Utilities concerning the Board's requirements to comply with state legislative action calling for consideration of a lifeline credits program.

140 pages \$6.75

NRRI-79-30

NEW MEXICO'S LIMITED ADJUSTMENT CLAUSES - AN ANALYSIS OF EFFICIENCY INCENTIVES, September 1979

By Russell J. Profozich and Alvin Kaufman,  
consulting economists

Assesses the workings of existing fuel adjustment clause and purchase gas adjustment clause for the New Mexico Public Service Commission with suggestions for improvement.

80 pages \$5.50

GENERIC RESEARCH REPORTS

Generic research reports were prepared under a contract with the U.S. Department of Energy. Each report analyzes a regulatory issue of interest to several state regulatory commissions.

NRRI-79-11      COMMISSION-ORDERED MANAGEMENT AUDITS OF GAS AND ELECTRIC UTILITIES, November 1979

By Raymond W. Lawton and Richard Seiden, NRRI

Inventories current practices and experiences of commissions with management audits they have ordered of regulated electric and gas utilities.

99 pages                      \$5.50

NRRI-79-18      ANALYSIS OF SELECTED FINANCIAL ASPECTS OF THE ELECTRIC UTILITY INDUSTRY, September 1979

By D.N. Jones, R.J. Krasniewski, R.J. Murdock, W.D. Duran, and C. Odle, NRRI and The Ohio State University; and Warren E. Farb, consulting economist

Presents reports on three aspects of electric utility financing: capital needs; regulation in a period of sustained inflation; and comparative returns and risks in the regulated and non-regulated sectors.

218 pages                      \$7.75

NRRI-79-19      CONTINGENCY PLANNING FOR ELECTRIC UTILITIES: THE SUMMARY OF A CONFERENCE AND A DATA COLLECTION EFFORT, August 1979

By George L. Smith, Jr. and Lynette Krysty, The Ohio State University

Identifies and classifies existing programs in all states for responding to electric energy emergencies and conducts a simulated test of Ohio's contingency plan.

178 pages                      \$7.25

- NRRI-79-23**      **RECOMMENDATIONS FOR REGULATORY ACTIONS TO PROMOTE POWER PLANT PRODUCTIVITY IMPROVEMENTS, October 1979**
- By The NRRI Working Group on Power Plant Productivity, Chris Poseidon, editor
- Describes a model program of regulatory actions to promote power plant productivity improvements; summarizes studies and activities by the federal government, industry and state regulatory commissions to improve power plant productivity; and presents recommendations for the consideration of state regulators for the promotion of power plant productivity improvements.
- 174 pages                      \$7.25
- NRRI-79-24**      **EXPENSE AND INVESTMENT TREATMENT OF RESIDENTIAL CONSERVATION MEASURES, September 1979**
- By Richard Darwin, NRRI; and Raymond J. Krasniewski and Richard J. Murdock, The Ohio State University
- Presents the accounting methods and procedures presently used by state utility regulatory commissions for the expense and investment treatment of residential energy conservation measures.
- 35 pages                      \$4.50
- NRRI-79-27**      **TRENDS IN STATE REGULATORY COMMISSION DEVELOPMENT AND FUNCTIONING, October 1979**
- By Raymond W. Lawton, editor, NRRI
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