

## General Overview

- Attached are each of the utilities' responses to staff's interrogatory BEA 1-9. We also here provide a brief description of the process that was used to aggregate the data as referenced within the affidavit and its attachments. Please note however, that the basic comparison that was requested from the utilities and referred to in the affidavit is the composite difference between an all-in customer bill including delivery, commodity and associated taxes and fees using the reported ESCO billed amounts versus the otherwise incumbent utility for the same amount of usage and commodity.
- Similar analysis methodology was conducted for all utilities. As you are aware, utility data was provided with slight variations in format; however, the content remained consistent in which we focused on the "Delta" or "Aggregate Difference" amounts provided by the utilities on a monthly basis. In order to derive the amounts found on the chart in Exhibit A - we used **SUMIFS** formula which is discussed further for each utility below. In order to derive the 30 month period aggregate amounts found on the table in Exhibit B – we utilized the **SUBTOTAL** formula which is discussed further for each utility below.

## Con Edison

- On the "Con Ed Summary Monthly" tab, we used the **SUMIFS** formula for columns K – V to sum the Aggregate Difference (Column I) based on Year, Month, and Account Type (RESIDENTIAL).
- On the "Con Ed Summary Annual" tab, we used the **SUBTOTAL** formula to sum the total Aggregate Difference (Column H) with a RESIDENTIAL filter on the Account Type (Column C).

**KEDLI and NMPC** – Data was supplied for both KEDLI and NMPC on the same spreadsheet. CD\_CO (Column C) differentiates the two utilities (12 – NMPC and 37 – KEDLI).

- On the "Comparison" tab we used the **SUBTOTAL** formula to sum the Delta (Column K) with a RESIDENTIAL filter on Account Type and a filter on CD\_CO (Column C) for both utilities.
- Tabs "NMPC" and "KEDLI" were derived by filter down by utility on the "Comparison" tab. These two tabs were used to derive the monthly aggregate Delta total in a similar methodology to Con Ed utilizing the **SUMIFS** formula.

## KEDNY

- On the "Comparison" tab with no applied filters to any column we derive the monthly aggregate total utilizing the same **SUMIFS** formula.
- To obtain the aggregate total for the 30 month period, we used the **SUBTOTAL** formula with a "Res" filter on Account Type (Column E).

**Central Hudson** – Noted on table that data includes some commercial

- On tab "CH1b" we derived the aggregate sum for the 30 month period utilizing the **SUBTOTAL** formula and apply filters for gas and electric SC1, SC6, SC 12 to Service Class (Column B).
- On tab "Monthly Aggregates" is a copied and pasted "CH1b" tab which is the data for SC1, SC6, and SC12 gas and electric service classes. We derived the monthly aggregate deltas utilizing the **SUMIFS** formula in a similar methodology as for the above utilities.

## O&R

- On the “Complete” tab with no filters applied we derived the monthly aggregate totals using the **SUMIFS** formula similar to rest of the utility spreadsheets.
- On the same tab, we derived the 30 month aggregate delta amount by apply a RESIDENTIAL filter to Account Type (Column E). This total came out to be \$49,183,170.90. O&R included in their data information for July – September 2016, which by applying the appropriate filters to the table resulted in \$895,309.43. This amount was then back out from the \$49,183,170.90.

**NYSEG and RG&E** – NYSEG and RG&E provided data on separate spreadsheets by Year and by Service Type (electric and gas). Data was not furnished for Jan – August 2014 and totals do include some Commercial.

- The six spreadsheets for NYSEG and RG&E each required the **SUBTOTAL** formula for the aggregated delta amounts and **SUMIF** formula for the monthly aggregated delta amounts as completed in a similar methodology to the other utilities. Once each was each spreadsheet completed separately, the data was copy/pasted into the Totals Electric and Gas for each utility document to derive the sum of combined delta amounts.
- NYSEG electric is filtered to SC 1, 8, and 12. NYSEG gas is filtered to SC 1.
- RG&E electric is filtered to SC 1 and 4. RG&E gas only provided SC 1.
- To be consistent- Low Income data was filtered to same services classes as above.
- In completing this review, a filtering error was found in the 2014 and 2016 data for NYSEG. The correction resulted in an updated aggregated amount from September 2014 – June 2016 to \$84,052,509 (previously \$86,250,711). Similar filtering adjustment was required for NYSEG’s Low Income data resulting is a slight adjustment in that aggregate delta amount to \$14,383,020 (previously \$14,399,273). Included is an updated Exhibit B.