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June 12, 2025

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 W. Saginaw Highway
P.O. Box 30221
Lansing, MI 48909

Re: **MPSC Case No. U-21859**

Dear Ms. Felice:

Attached for electronic filing in the above-referenced matter, please find the Direct Testimony and Exhibits of John D. Albers on behalf of the Michigan Energy Innovation Business Council, the Institute for Energy Innovation, and Advanced Energy United, together with the Proof of Service. Thank you for your assistance in this matter.

Very truly yours,

Justin K. Ooms Digitally signed by Justin K. Ooms
Date: 2025.06.12 16:32:21 -04'00'

Justin K. Ooms

JKO/srd
Enclosure
c. All parties of record.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

****

In the Matter of the Application of **Consumers Energy Company** for Ex Parte Approval of Certain Amendments to Rate GPD.	))))	**Case No. U-21859**

DIRECT TESTIMONY OF JOHN D. ALBERS

ON BEHALF OF

THE MICHIGAN ENERGY INNOVATION BUSINESS COUNCIL,

INSTITUTE FOR ENERGY INNOVATION,

AND

ADVANCED ENERGY UNITED

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I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is John D. Albers. My business address is 1801 Pennsylvania Avenue NW, Suite 410, Washington, DC 20006.

Q. By whom are you employed and in what capacity?

A. Since October of 2023, I have been employed by Advanced Energy United, Inc. ("United") as the Director overseeing regulatory policy for the central states where United is active. This includes Illinois, Michigan, Indiana, and Wisconsin.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of the Michigan Energy Innovation Business Council ("Michigan EIBC"), the Institute for Energy Innovation ("IEI") and United, collectively referred to as "MEIU."

Q. Did you prepare or direct the preparation of this testimony?

A. Yes.

Q. Please describe your background.

A. I earned a Bachelor of Arts in Political Science from Illinois State University in 1994 and Juris Doctorate from the University of Illinois College of Law in 1997. I have been admitted to practice law in the State of Illinois since 1997.

In February of 1998 I joined the Illinois Commerce Commission ("ICC") as an Administrative Law Judge and presided over nearly every type of public utility matter that came before the ICC until I left in 2015. Issues I gained experience with include, but are not limited to, rate design, cost recovery, interconnection, metering, energy procurement, renewable energy credit ("REC") procurement, and distributed generation ("DG"). Over the years, I took on increasing responsibility, including overseeing informal agency workshops, testifying on behalf of the agency in legislative hearings, and recommending agency positions on proposed legislation.

After leaving the ICC, I practiced law until early 2022, representing and advising individuals, small and large businesses, small utilities, and state and national not-for-profit organizations on various matters pertaining to renewable energy, infrastructure siting, utilities, distributed generation, tariffs, and other issues. I frequently represented clients in matters before the ICC. During this period, I also worked part-time as a contract real estate developer for IPS Solar securing leases and permits for community solar projects in Illinois.

From March of 2022 until August of 2023, I oversaw SunPower Corporation's policy and strategy efforts in the Midwest. SunPower was a national seller of residential rooftop solar energy systems. In this role I educated state utility regulatory commissioners and legislators and advocated for policies that would improve and expand the market for residential solar installations.

In my role at United, I advocate for policies at state utility regulatory commissions that enable greater deployment of advanced energy technologies with the ultimate goal of powering our economy with clean energy. This requires understanding member interests and priorities. Recent areas of interest include siting larger distributed energy resources ("DERs"), interconnection of both large and small DERs, as well as electric vehicle charging stations, aggregation of DERs as part of virtual power plants ("VPP"), large load tariffs, decarbonization of the natural gas distribution system, and better planning and coordination by and between electric and gas utilities. My work experience and education are set forth in detail in my resume, attached as Exhibit MEIU-1.

Q. Are you representing MEIU as legal counsel as well?

A. No. I am not representing MEIU as legal counsel and am not testifying as an attorney. MEIU will present its legal arguments in its briefs.

Q. Have you previously testified before the Michigan Public Service Commission ("Commission")?

A. Yes, on two occasions. I previously offered testimony in Case No. U-21585, concerning Consumers Energy Company's ("Consumers") application to increase its electric rates. My testimony addressed Consumers' proposed DER management system ("DERMS") and the need to maintain a proper inventory of equipment with long-acquisition lead times. I also offered testimony in Case No. U-21375, concerning DTE Electric Company's ("DTE") voluntary green pricing ("VGP") program, and specifically whether the Commission should require DTE to purchase RECs from customers with DG systems.

Q. Have you previously testified before other state public utility commissions?

A. Yes. I offered testimony in 2022 on behalf of the Joint Solar Parties in ICC Docket No. 22-0036 regarding net metering. I also testified in 2024 on behalf of United in ICC Docket No. 22-0486 pertaining to data access, a proposed spare transformer program, and DERMS. At the Indiana Utility Regulatory Commission, I offered testimony in 2024 on behalf of United in an investigation (Cause No. 46043) concerning whether DER aggregators are public utilities under Indiana law.

Q. Are you offering any exhibits with your testimony?

A. Yes, I am offering the following exhibits:

- Exhibit MEIU-1: Résumé of John Albers
- Exhibit MEIU-2: Discovery response U21859-AG-CE-0015 Supplemental
- Exhibit MEIU-3: Discovery response U21859-DCC-CE-0046
- Exhibit MEIU-4: Discovery response U21859-MNSC-CE-0070
- Exhibit MEIU-5: Discovery response U21859-MNSC-CE-0027

Q. What is the purpose of your testimony?

A. The purpose of my direct testimony is to respond to Consumers' proposal to revise its existing Large General Service Primary Demand Rate GPD ("Rate GPD") with provisions to specifically reference data centers.

Q. Do you support Consumers' proposed revisions to Rate GPD?

A. The proposed revisions focus on insulating Consumers and existing ratepayers from the risks associated with providing service to new large customers. In so far as they go, I generally support the proposed revisions to Rate GPD. Protecting existing ratepayers from what are generally large capital expenditures to serve specific customers with a high load factor is very important, particularly in this period of increasing utility costs. Consumers' proposed revisions, however, do not encompass the full suite of issues that need to be considered when serving new or expanded large-load customers.

Notably, Michigan's energy laws (i.e., Public Act 295 of 2008 as modified by Public Act 342 of 2016 and Public Act 235 of 2023, and Public Act 3 of 1939 as modified by Public Act 341 of 2016) and, if applicable, tax incentive qualifications (as in Public Acts 181 and 207 of 2024), impose requirements that affect the provisioning of electrical service that are not accounted for in the proposed revisions to Rate GPD. Additionally, it is not uncommon for large-load customers to have voluntary renewable energy goals as part of organizational environmental, social, and governance ("ESG") goals. The proposed revisions to Rate GPD do not reflect such ESG goals either. I recommend that Consumers fully accounts for how it intends to satisfy both its obligations under Michigan law and the preferences of new customers for low-carbon or carbon-free resources.

The necessity to "get it right" in this instance is all the more important because the Commission has, to my knowledge, not previously opined on the question of serving customers with electrical demand at the scale seen in the inquiries Consumers reports.

Even if it had, the Commission has not done so previously under the framework of the new clean energy and data center tax incentive statutes. In light of this backdrop, I recommend that the Commission carefully consider the broader context within which Consumers is seeking relief.

II. RELEVANT STATE ENERGY STATUTES

Q. Can you elaborate on the energy planning laws you reference above?

A. Yes, there are several key provisions in the state's energy laws that are relevant. The first is the requirement under MCL 460.6t that each utility whose rates are regulated by the Commission file an integrated resource plan ("IRP"). Briefly, an IRP contains a utility's long-term forecast of electric sales and peak demand under different scenarios and a plan for meeting that demand in accordance various statutory parameters. The second is the requirement under MCL 460.1028 that each utility acquire an increasing number of RECs in compliance with the statute's renewable portfolio standards ("RPS"). The third is the requirement under MCL 460.1022 that each utility file a renewable energy plan setting forth how it intends to satisfy its REC procurement obligation. The fourth is the requirement under MCL 460.1051 that each utility file a clean energy plan describing how it plans to meet the statute's increasing clean energy obligations. For clarity, I note that Michigan defines "clean energy" and "renewable energy" differently under MCL 460.1003 and MCL 460.1011, respectively. To the extent that large loads from new customers affect the apportionment of a utility's minimum energy storage obligation under MCL 460.1011, that law represents a fifth statute impacted by the addition of significant new load.

In addition to these general energy planning laws, Michigan also recently enacted legislation specific to data centers that is likely relevant to any revisions to Rate GPD. Michigan, like some other states, has made it a policy to attract data centers and the investment their construction and operation bring. To encourage data center operators to locate their facilities within Michigan, in 2024, the legislature revised the state tax code to create favorable tax treatment for data centers. To be eligible for tax exemptions under MCL 205.54ee and MCL 205.94cc, both sections require a data center facility to procure clean energy equivalent to 90% of the facility's forecasted electricity usage on an annual basis. A facility can satisfy this requirement through (1) self-supply through on-site generation of renewable energy, (2) a long-term contract with the electric utility, or (3) participation in a voluntary green pricing program.[1] I recognize that data centers are only required to meet these requirements if they seek to take advantage of the tax exemptions, but it seems logical that at least some will be interested in seeking the favorable tax treatment.

Q. What is the significance of these statutes in relation to Consumers' proposed revisions to Rate GPD?

A. While I am not offering a legal opinion, it seems clear to me that the size of the electrical loads Consumers is attempting to plan for will impact its IRP, renewable energy plan, and clean energy plan, particularly if the new load comes from a data center seeking to take advantage of the aforementioned tax exemptions.

[1] See MCL 205.54ee(10)(e)(ix) and MCL 205.94cc(10)(e)(ix).

Q. How much new "large load" is Consumers expecting?

A. As shown in Exhibit MEIU-2, Consumers reports that it has received inquiries about supplying at least an additional 15,000 megawatts ("MW") of capacity. Admittedly, as shown in Exhibit MEIU-3, Consumers acknowledges that it cannot be certain that all of the inquiries pertain to unique facilities as opposed to multiple inquiries for the same facility at multiple alternative potential locations within its service area (*i.e.*, some double-counting may be present).

Q. How does this potential additional capacity compare to Consumers' current capacity resources?

A. According to its Form 10-K for the fiscal year ended December 31, 2024, Consumers owned 7,016 MW of generation capacity and purchased power from facilities with an additional 2,837 MW of capacity, for a total supply capacity of 9,853 MW.[2] While it is unlikely that all of the projects for which Consumers has received inquiries will get built, it is also clear that even if a small portion of the projects are built, they will have a significant impact on the amount of capacity Consumers will need to provide in the future compared to its historical load. Thus, it is evident that the potential load growth due to new large-load customers will impact the statutory energy planning requirements to which Consumers is subject. Therefore, any tariff language the Commission approves to address the issues associated with serving new large-load customers should not only cover ratepayer protection provisions, as is the case with the proposed revisions to Rate GPD,

[2] See Consumers' Form 10-K for 2024, p. 22, available at: https://www.sec.gov/ix?doc=/Archives/edgar/data/0000811156/000081115625000036/cms-20241231.htm#ic43cff4efdfd4f2fb7296396b8a97b31_58.

but it should also address how the power will be sourced, particularly since some large-load customers, *i.e.*, data center facilities, will have a choice (from among three options identified in MCL 205.54ee(10)(e)(ix) and MCL 205.94cc(10)(e)(ix)) in how a significant portion of their load will be met if they plan to avail themselves of the tax exemptions under MCL 205.54ee and MCL 205.94cc.

III. LARGE LOAD TARIFF CONSIDERATIONS

Q. What revisions to do you recommend to Consumers' proposed tariff language?

A. At the outset, I note that I do not have an opinion as to whether any tariff language addressing large loads should be contained in Rate GPD, another existing Consumers tariff, or an entirely new tariff. While I will defer to the Commission to make that decision, a separate clean transition tariff for large load customers may be the simplest method of reflecting in a tariff the large load principles that I recommend.

The first principle that I offer relates to the types of customers to which a large load tariff would apply. While I recognize that data centers frequently come to mind when thinking of new large load customers, I recommend against singling them out for unique treatment. Any new large load tariff should allow participation from a diversity of large load customers with different load shapes and geographic footprints. As businesses and technologies evolve, it would be prudent to have tariff language in place that provides all new customers meeting certain characteristics with a path for service that may include loads that are larger than customary. I recommend a threshold of 25 MW of new load to qualify for any new large load tariff. As shown in Exhibit MEIU-4, the vast majority of

customers currently on Rate GPD have a billing demand far below 25 MW, which indicates to me that 25 MW and above is beyond the customary load that Consumers sees and is a reasonable threshold.

Second, a large load tariff should generally provide for the customer's ability to choose the type of resources desired, such as generation, transmission, or distribution resources that are sourced or supported via utility procurements, bilateral or trilateral contracting, behind-the-meter and/or front-of-meter collocation arrangements. Given the size of the loads in question and operating under the premise that existing customers would be insulated from the cost of serving such new load, allowing the new large-load customers more say in how their load is served is appropriate and reasonable.

Q. Can you elaborate on what you mean by allowing the new customer to have more say in how it is served?

A. Yes. As I described above, of the aforementioned inquiries Consumers reports receiving from potential new large load customers reflected in Exhibit MIEU-2, 32 identified their anticipated load size. After removing an outlier seeking only 4 MW of capacity, the remaining 31 are seeking between 50 and 1,200 MW, with the average request being 492 MW.[3] Each of these potential customers is considering a substantial amount of capacity. In some cases, just one customer's potential need would likely exceed the nameplate capacity of a typical natural gas combined cycle power plant. And as I stated earlier, it is

[3] The aggregate load among the 32 entities in Exhibit MEIU-2 that identified their load is 15,249 MW. After subtracting the referenced 4 MW outlier, the remaining load among the 31 remaining entities is 15,245. The average load among the entities is 491.77 MW (15,245/31).

not uncommon for customers of this size to have ESG goals that include consideration of the environmental attributes of the energy they use, as well as environmental justice issues. If Consumers must plan for obtaining renewable and clean energy under existing law, and the customer will be held responsible for the investments to serve the new load it is bringing to Consumers, it is reasonable to take into account, to the extent feasible, the new customer's preferences. Data center customers seeking to utilize the tax exemptions described above already have an option under state law to determine how their load will be served to meet a 90% clean energy standard.

To help ensure that Consumers can meet its energy planning obligations, a large load tariff should provide options for the large load customer to deploy resources or fund solutions for meeting the desired service, recognizing that the IRP, renewable energy plan, clean energy plan, and any other energy waste reduction ("EWR") or demand response ("DR") statutory obligations exist as a floor. On one end of the spectrum are behind-the-meter ("BTM") resources located at the site of the new customer or at a contiguous site under the rubric of self-service power. See MCL 460.10a(4). To the extent that a new large load customer can provide firm on-site resources (or firm resources located on a contiguous site), Consumers' tariff should reflect that minimum demand calculations will consider the netting capabilities of a customer's firm commitments to reduce load with BTM or self-service power resources. On-site (or contiguous-site) supply could also be encouraged as a means to reduce load by allowing a customer to decide to construct such resources during a ramp up period without a penalty or exit fee. In other words, if a customer decides to install on-site (or contiguous-site) generation or energy storage after committing to a

project but before the utility incurs irreversible costs to serve the full originally anticipated load, the customer should be able to reduce its load through the use of on-site (or contiguous-site) resources without penalty.

Still within the realm of BTM and self-service power resources but not on or contiguous with the customer's site would be an option for a new customer to make incremental monetary contributions to existing EWR, DR, VPP, and demand flexibility programs that deliver broader grid benefits and create headroom that can lower the cost and increase the speed of connecting the new large loads. By giving the new large load customer the option to help other customers reduce their impact on the grid through increased utilization of programs that reduce or shift energy usage, it should be easier for Consumers to serve the new large load customer. A new large load customer could also earmark its contributions toward programs aiding low-to-moderate income customers and/or establish new programs that enable DG as a resource, such as financially supporting the installation of BTM rooftop solar and battery energy storage systems. Such programs should not be required to achieve cost-effectiveness equivalent to existing, approved, or historical utility programs, as long as any incremental costs are voluntarily borne by the large load customer. To be clear, I would not expect such incremental contributions to existing programs or contributions establishing new programs to completely alleviate the need for new generation to serve a new large load customer, but such contributions could mitigate the need and should be an option available for a large-load customer to choose.

Q. Are there options in front of the meter as well?

A. Yes. Improvements to substations, whether they serve the new large load customer or other customers, can result in more efficient grid operations overall and enable Consumers to more quickly and efficiently provide the level of service the new customer is seeking. An example of an improvement at the distribution level and at substations is the implementation of dynamic transformer rating ("DTR"). DTR involves assessing a transformer's thermal rating based on real-time conditions. Such monitoring has the potential to temporarily increase transformer capacity.

If, in the interest of its customers, Consumers is willing to work with Michigan Electric Transmission Company, deployment of grid enhancing technologies ("GETs") represents another option in front of the meter that can hasten service to new large load customers at a lower overall cost. While there is no official definition of GETs, the United States Department of Energy ("DOE") has generally described GETs as a family of technologies that include sensors, power flow control devices, and analytical tools used to maximize the transmission of electricity across the existing electric system.[4] A common example of GETs is dynamic line rating, which involves calculating thermal limits of existing transmission lines based on real-time and forecasted weather conditions. With this information, more energy can be safely transmitted across existing infrastructure.

[4] DOE, Grid-Enhancing Technologies: A Case Study on Ratepayer Impact, February 2022, at ii, available at https://www.energy.gov/sites/default/files/2022-04/Grid%20Enhancing%20Technologies%20-%20A%20Case%20Study%20on%20Ratepayer%20Impact%20-%20February%202022%20CLEAN%20as%20of%20032322.pdf#:~:text=Grid-enhancing%20technologies%20(GETs)%20maximize%20the%20transmission%20of,power%20flow%20control%20devices%2C%20and%20analytical%20tools.&text=The%20term%20GETs%20encompasses%20new%20technology%20used,customer-side%20management%2C%20and%20coordinated%20electric%20vehicle%20charging.

Whether such improvements at both the distribution/substation level and transmission level would mitigate the need for other resources would clearly depend on Consumers evaluating the feasibility of each. Such actions may not be viable in some situations, but they are worth exploring if the new customer is interested because they may provide an overall less expensive and/or faster means of delivering service. Assuming Consumers has its customers' best interest in mind, such options should be available and listed in its tariff.

Q. Are you suggesting that letting a new large load customer facilitate load reductions or load shifting BTM and improvements to substations or transmission facilities can provide enough headroom to enable Consumers to serve the new large load customer without substantial capacity additions?

A. No. In light of the size of most of the projects that have approached Consumers, it is unlikely that the options I have suggested could, without additional resources, enable Consumers to meet the expected demand of most of the projects if they are built. What I am recommending is that Consumers' tariff offer new large load customers the opportunity to choose from among a suite of advanced energy technologies and solutions that can reduce the amount of new generation, and possibly new transmission and distribution facilities, that Consumers would otherwise have to construct and/or the amount of power that Consumers would otherwise have to purchase to serve the new large load customer. Such options may enable the new customer to obtain the service it desires at a lower overall cost, which benefits not only the new customer but also all other existing customers by reducing the risk of stranded assets to the extent such risk is not fully ameliorated by the tariff.

Q. How should remaining capacity needs be satisfied?

A. In the first instance, Section C10.6(H) among Consumers' existing tariff sheets[5] already allows eligible participating customers to utilize renewable energy from either their own renewable facilities or from facilities owned by third parties, with no requirement that any such facilities be co-located or BTM. Section C10.6(H) refers to this arrangement as using an "External Power Purchase Agreement." Consumers' tariff should reference Section C10.6(H) to confirm this option for renewable resources is available to large load customers. However, a customer availing itself of Section C10.6 must participate in Consumers' VGP program. Because a large load customer may not find the VGP program appropriate for its needs, the use of third-party power purchase agreements should not be limited to participation in the VGP program as currently in place. Revisions to the VGP program may be warranted to fully accommodate new large load customers.

Regardless of whether or not the new large load customer chooses from a tariff any of the options I describe above, it is likely that Consumers will still need to acquire additional capacity through either facility construction or power purchases. A tariff geared toward large load customers should provide that to satisfy the capacity not addressed through any of the other options, Consumers will issue a competitive all-source request for proposals ("RFP") open to both utility-owned projects and third-party owned projects.

[5] Consumers Energy Company, M.P.S.C. No 14 – Electric, Original Sheet Nos. C-56.60 and C-57.00.

Consistent with the Commission's guidelines for competitive procurement[6] and MEIU's position in numerous earlier cases,[7] I recommend that responses to any RFP be evaluated by an Independent Administrator ("IA"). The Commission's guidelines for competitive procurement define an IA as:

> [A] non-affiliated, unbiased entity without a business interest in the outcome of the solicitation or similar solicitations hired by the utility to work with the utility and administer the Competitive Procurement process. This entity will have final evaluation and scoring responsibility for proposals resulting from an RFP and will communicate these results to the utility by redacting any of the respondent's identifying information until such time as the utility enters negotiations with the respondents. The utility will maintain final selection of all proposals.[8]

In the absence of an IA in a competitive procurement process open to utility participation, there is an opportunity for utility bias when projects are selected. An IA would protect against this risk and ensure a competitive procurement process consistent with the interests of customers.

If a resource preferred by the new large load customer is not selected as part of the lowest cost portfolio, the large load customer should have the option to pay a price premium to include its preferred resource type in the planning process. The price premium would be the difference between the optimized, lowest cost utility portfolio price without the requested resource and the new (higher) cost once the resource is incorporated.

[6] September 9, 2021 Order in Case No. U-20852, Exhibit A, p. 1.
[7] See, *e.g.*, Direct Testimony of Laura Sherman on behalf of MEIU, Case No. U-21172, at 26 (included in the record in that case at 2 Tr 398); Direct Testimony of Laura S. Sherman on behalf of MEIU, Case No. U-21375, at 14 (included in the record in that case at 2 Tr 218); and Direct Testimony of Matthew McDonnell on behalf of MEIU, Case No. U-21816, at 24 (included in the record in that case at 4 Tr 653).
[8] September 9, 2021 Order in Case No. U-20852, Exhibit A, at 1.

Q. You are essentially proposing a tariff with a menu of options for a large load customer to choose from. Do you have any concerns about the practicality of this method?

A. I admit that this method will require some upfront work by Consumers to help the new large load customer determine which set of options is best in a particular situation. But bear in mind that the options are aligned with Michigan's statutory renewable and clean energy standards, so in that regard my recommendation is consistent with both the state interest and the new large load customer's self-interest in choosing for itself how its contribution to utility load will comply with those standards. I would not expect Consumers to develop this customer-specific information for every inquiry it receives. Instead, projects should be required to reach a reasonable milestone to receive this information. For example, Consumers could develop this information only for projects that have paid an additional cost-based nonrefundable fee to cover modeling costs above what is covered by the initial $100,000 application fee.

In contrast to what I propose, the greater burden would arise if Consumers simply chose to "go it alone" and unilaterally decide how to best supply each new large load customer. Since most, if not nearly all, of the new large load customers could basically require their own power plant, Consumers could find itself regularly seeking to reopen its IRP, renewable energy plan, and clean energy plan whenever a new large load customer commits. This may be Consumers' plan. As shown in Exhibit MEIU-5, when asked what planning it has done to fulfill the 90% clean energy requirement for data centers, Consumers responded that it will consider future load growth and clean energy requirements "within the integrated resource plan process." Because we are essentially

talking about a new power plant with each new large load customer and I assume that Consumers takes seriously the State's interest in a meaningful planning process, I understand Consumers to suggest that it will seek to update its IRP as needed to ensure a useful plan and legitimate path to meeting its renewable and clean energy obligations. The regulatory burden on stakeholders, not to mention the delay for the affected customers, would be very costly and impractical. While some may argue that such updates to the IRP, renewable energy plan, and clean energy plan would not be necessary, it is difficult to see how that could be true since just one or two large load projects could disrupt the plans between their regular filing and review to the point of rendering them meaningless as a planning tool.

Moreover, in the context of data centers, Consumers must already allow such customers to choose from among (1) self-supply through on-site generation of renewable energy, (2) a long-term contract with the electric utility, or (3) participation in a voluntary green pricing program to meet at least 90% of their expected load if they wish to take advantage of available tax exemptions. Incorporating the additional options I describe to allow data centers to meet their remaining load, and all other large load customers (and any data centers not utilizing the tax exemption) to meet their load is in the customer interest and avoids the need to update the statutorily required energy plans. In other words, the more the utility can ensure that the incremental supply aligns with what the customer wants and is willing to pay for, the more relevant all the other plans will remain until their next cycle. This is especially the case if those customers are seeking 90% or greater clean resources

because that will ensure that the incremental resources to meet their needs remains consistent with state laws around clean energy.

Q. Do you have any other recommendations related to Consumers' large load tariff?

A. Yes. I have two additional recommendations.

First, the tariff options should be structured in a way that permits the large load customer to quantify and document its voluntary contributions to programs for ESG reporting. Consideration of this beforehand should make it easier for customers to fully document their contributions for reporting purposes.

Second, to the extent that meeting new load leads to new wind, solar, or battery storage facilities following an all-source RFP, the ownership of such facilities should be split 50/50 between Consumers and third-party developers. Although state law no longer requires a 50/50 split between utility-owned and non-utility-owned renewable energy projects, it is still in the public interest to follow this practice, which has been repeatedly approved by the Commission in settlement agreements. Consumers most recent IRP cases, Case Nos. U-20165 and U-21090, for example, both include a 50/50 renewable project ownership split. The latter case settlement included the following provision related to ownership:

> The parties agree that the new capacity that the Company intends to procure through the PCA, in each Annual Solicitation, shall be: (i) acquired through a competitive bidding process; and (ii) approximately 50% will be from PPAs and other third-party agreements that do not result in Company ownership and approximately 50% will be owned by the Company, as acquired through a competitive bidding process. The new capacity acquired from PPAs or other third-party agreements that do not result in Company ownership will not compete against the new capacity which will be owned

> by the Company. The Company will use commercially reasonable efforts to maintain the 50%/50% proportion for new IRP resources from 2022 through the Company's next IRP proceeding, and in no event shall any given annual solicitation result in the Company owning more than 60% of the new capacity acquired in such solicitation. The Company, in its sole discretion, may also choose to acquire more than 50% of its new capacity from third parties. The parties further agree that the Company's affiliates will be prohibited from bidding on the portion of the Company's new capacity acquired from third parties.[9]

I recommend that substantively similar parameters be utilized in relation to any RFP issued to serve new large load customers.

Q. Why is an ownership split necessary?

A. Under MCL 460.6s, the Commission must ensure that utility proposals are reasonable and prudent. This responsibility entails protecting customers from paying more for service than is necessary and applies whether talking about all utility customers or even just a single large load customer. The Commission's own experience demonstrates that the competitive market can deliver lower cost projects. In Case No. U-18232, for example, the Commission noted that,

> . . . since 2009, 'for each year in which there were both company-owned projects and purchased power agreements, the weighted average cost of the purchased power agreements was lower than the company-owned projects in that respective year.' MPSC, *Report on the Implementation and Cost Effectiveness of the PA 295 Renewable Energy Standard*, February 15, 2017, p. 19.[10]

Staff similarly noted in direct testimony in Case No. U-20984 that:

> PPAs could provide [Voluntary Green Pricing] VGP subscribers with a lower cost option for solar assets. For example, earlier this year, the Commission approved applications requesting approval of solar contracts resulting from the 2019 [IRP] competitive solicitation. The average PPA and financial compensation mechanism (FCM) cost for the 25-year 140

[9] June 23, 2022 Order in Case No. U-21090, Exhibit A, at 9.
[10] July 26, 2023 Order in Case No. U-21193, at 23.

> MW Calhoun Solar Energy project is $57.73/MWh. The company-owned BTA for the 150 MW Mustang Mile Solar project has a 25-year average cost of $66.51/MWh. In this instance, the PPA with FCM is 13% less costly than the company-owned BTA. The Calhoun Solar Energy and Mustang Mile projects have expected commercial operation dates of 2022 and 2023, respectively. If the Company were to utilize PPAs, it could result in lower costs to VGP customers when compared to the Company's proposal to utilize only company-owned BTAs.[11]

Although the Commission may ultimately approve tariff language insulating, or limiting risk for, non-large load customers, the large load customer is also entitled to protection from unreasonable costs, even if the large load customer is willing to pay more for preferred resources (so long as Michigan's renewable and clean energy requirements are met). A 50/50 ownership split with non-utility developers will bring the benefits of the competitive market to bear on the RFP process.

Moreover, beyond the near-term cost differences experienced in a particular RFP, the Commission also has an obligation to ensure that prices remain competitive for customers over the long-term. Ensuring a strong third-party market exists in Michigan will benefit not only large load customers but also all other customers whenever a Michigan utility seeks proposals to provide new capacity. As the Commission itself has noted, third-party developers can provide capacity at prices lower than the utility.

Furthermore, without an obligation to procure at least half of any new capacity from third-parties, a utility will know that it need only undercut the competition long enough to discourage competitors until they move on to more competitive markets. After which,

[11] Direct Testimony of Meredith A. Hadala on behalf of the Michigan Public Service Commission Staff, Case No. U-20984, at 6 (citing Application of Consumers Energy Company in MPSC Case No. U-20165, Filing No. U-20165-0005, Exhibits A-2 & A-3).

when the utility is "safe" from competitors, it is free to provide capacity at a higher price and recover its costs from captive ratepayers. Given the inherent capital bias in the traditional utility ratemaking model, it is incumbent upon the Commission to consider this dynamic and protect customers both now and in the future by directing at least half of new renewable capacity be sourced from third parties. Failure to consider this market reality, or, more importantly, a failure to take steps to address it, will harm Michigan ratepayers.

Q. You have shown that Michigan has benefitted from an ownership split when procuring new renewable capacity. Have other jurisdictions had similar experiences?

A. Yes. I note that in Case No. U-21816, Matthew McDonnell offered testimony on behalf of MEIU that described other jurisdictions where third-party resources proved equivalent to or more economical than utility resources.[12] One example from Virginia concerns Dominion Energy's 2024 IRP. In that proceeding, Dominion assumed a cost of $67/MWh for third-party-owned solar resources, while utility-owned solar resources are estimated to result in a cost of $80/MWh. Energy storage resources reflect similar cost differences.[13] More compelling are examples from Washington and Idaho, where Avista's 2025 IRP models all of its projected solar, wind, and other renewable resource options as third-party-owned rather than utility-owned resources.[14] Like Consumers, these utilities are vertically integrated, investor-owned electric utilities.

[12] Direct Testimony of Matthew McDonnell on behalf of MEIU, Case No. U-21816, at 19–20 (included in the record in that case at 4 Tr 648–49).

[13] Dominion Energy Virginia, Appendix 3K-1 – Comparison of per MWh Costs of Selected Resources, 2024 Integrated Resource Plan, Case No. PUR-2024-00184, October 15, 2024, Available at: https://www.dominionenergy.com/-/media/pdfs/global/company/IRP/2024-IRP-w_o-Appendices.pdf.

[14] Avista Utilities, 2025 Electric Integrated Resource Plan, December 31, 2024, Available at: https://www.myavista.com/-/media/myavista/content-documents/about-us/our-company/irp-documents/2025/2025-avista-electric-irp.pdf, pp. 185, 191.

IV. CONCLUSIONS AND RECOMMENDATIONS

Q. Please summarize your conclusions and recommendations to the Commission.

A. I recommend that the Commission:

1. Recognize that Consumers' proposal must be considered in the context of Michigan's IRP, renewable energy plan, clean energy plan, data center tax exemption legislation, and other applicable legislation and rules;
2. Find that Consumers' proposal should not be limited to data centers but rather be applicable to large load customers broadly bringing at least 25 MW of new load;
3. Require Consumers' tariff to provide to large load customers the options I describe for addressing the new load, including, but not limited to, (a) on-site generation, (b) supporting incremental additions to existing EWR, DR, and VPP programs, (c) supporting new programs aimed at reducing system load such as establishing DG as a resource, (d) improving substations and transmission lines, (e) supporting GETs deployment, and (f) the use of competitive all-source requests for proposals;
4. Find that Consumers' minimum demand calculations should consider the netting capabilities of a customer's firm commitments to reduce load with BTM resources;
5. Encourage on-site supply as a means to reduce load by allowing a customer to decide to construct such resources during a ramp up period without a penalty or exit fee;
6. Require Consumers to use an Independent Administrator for any competitive procurement RFP processes initiated to serve new large load; and

7. Require the Company to procure roughly equivalent MWs of renewable energy resources from PPAs and build-transfer agreements/self builds.

Q. Does this conclude your testimony?

A. Yes.

4904-6749-7291, v. 6

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

*****

In the Matter of the Application of **Consumers Energy Company** for Ex Parte Approval of Certain Amendments to Rate GPD.	))))	**Case No. U-21859**

EXHIBITS OF JOHN D. ALBERS

ON BEHALF OF

THE MICHIGAN ENERGY INNOVATION BUSINESS COUNCIL,

INSTITUTE FOR ENERGY INNOVATION,

AND

ADVANCED ENERGY UNITED

JOHN D. ALBERS

Williamsville, Illinois
LinkedIn: johnalbersil
jalbers532@gmail.com / 217-415-6917

PROFESSIONAL EXPERIENCE

Director, Advanced Energy United, *2023-present*
Monitor and oversee regulatory efforts related to advanced energy technologies in Illinois, Michigan, Indiana, and Wisconsin on behalf of United and assist with legislative and education efforts as needed.

- Develop policy positions in furtherance of goal of a 100% clean energy economy.
- Ensure that member interests are represented in public utility commission proceedings affecting markets for renewable energy, battery storage, electric vehicles, energy efficiency, demand response, virtual power plants, and related advanced energy technologies.
- Draft legislation, testimony, and public comments and oversee preparation of same supporting goal of a 100% clean energy economy.
- Educate regulators, legislators, state agency officials, candidates, and media on the benefits of advanced energy technologies.
- Coordinate efforts among aligned organizations to support opportunities for clean energy to power our economy.
- Oversee engagement and work by outside counsel and consultants.

Policy Advocate, SunPower, Policy & Strategy, *2022-2023*
Monitor and influence legislation, rules, and regulatory proceedings impacting the residential solar and storage markets in the Midwest.

- Represent SunPower in state and national trade associations.
- Educate legislators and regulators on the benefits of solar and storage on the electric grid.
- Draft legislation, testimony, and public comments supporting solar and storage markets.
- Advise sales and products teams on opportunities and challenges from a policy perspective.

Attorney, Shay Law, Ltd. and Westervelt, Johnson, Nicoll & Keller, LLC, *2016-2022*
Advise and represent national and local renewable energy businesses and associations in their pursuit of strategies to achieve regulatory and legislative goals driving sustainable energy alternatives.

- Educate, advise, and represent clients on various matters related to energy and public utilities, including easement, contract, permitting, municipal ordinance, and utility infrastructure issues.
- Prepare witnesses and testimony in Illinois Commerce Commission tariff, rate, and certificate proceedings.
- Educate legislators and regulators through Illinois General Assembly committee testimony and one-on-one meetings.
- Draft legislation and rules to further client objectives and prepare written advocacy fact sheets, briefing papers, memoranda, media releases, and persuasive presentations.
- Consistently monitor utility filings, state legislative action, trade press, and other sources for issues of interest to or potentially impacting clients.
- Convene and collaborate with diverse groups and individuals to support clients in achieving shared goals.

Contract Real Estate Developer, IPS Solar*, 2018-2019 (part-time)*
Work independently to secure sites for and support growth of community solar in Illinois.

- Research suitable sites for solar farms taking into consideration utility service area, proximity of electrical grid and available capacity, topography, and flood plain.

JOHN D. ALBERS Williamsville, Illinois
LinkedIn: johnalbersil jalbers532@gmail.com / 217-415-6917

- Negotiate lease terms and compensation with landowners.
- Educate local authorities and area residents about solar energy and community solar projects.
- Work with local government authorities to obtain necessary permits for projects.

Assistant State's Attorney, Sangamon County State's Attorney, *2018-2019 (part-time)*
Work as the only attorney in a fast-paced short-notice setting to represent the State of Illinois in mental health cases filed in Sangamon County to aid those afflicted with mental illness. Upon being informed of which cases are going to trial, review files, interview physicians, caregivers, family, and law enforcement, prepare witnesses, and prepare arguments for trial scheduled the next day.

Administrative Law Judge III, IV, and V, Illinois Commerce Commission, *1998-2015*
Manage entire trial processes and prepare written decisions related to the electric, natural gas, water, sewer, and telecommunications industries. Based on reputation for being thorough, reliable, impartial, and adept at learning and analyzing new material, advanced quickly to highest ALJ rank. Because of my deep understanding of ICC operations, was recognized within agency as a leader and entrusted with tasks outside typical ALJ duties including leading stakeholder workshops to develop alternative dispute resolution rules and training and mentoring new ALJs on policies, practices, and precedent.

- Rule on and develop policy related to cost recovery, rate design, and service terms and conditions in utility rate cases, tariff proceedings, rulemakings, and other dockets.
- Prepare written decisions summarizing, analyzing, and resolving complex contested issues involving the electric, natural gas, water, sewer, and telecommunications industries, such as the "least cost" location for utility facilities and the use of eminent domain for such.
- Review pending legislation impacting the agency, recommend revisions and agency position, and provide testimony before Illinois General Assembly committees as needed.
- Manage multiple simultaneous complex cases and projects, many with expedited schedules, such as Ameren's petition seeking approval and location of a $1.1 billion 375-mile electric transmission line impacting over 8,400 landowners with a 7½-month deadline.
- Lead multiple hearings in Illinois communities explaining the agency process and facilitating public involvement in matters pending before the agency.

EDUCATION

University of Illinois College of Law, Champaign, IL
Juris Doctor, cum laude

Illinois State University, Normal, IL
Bachelor of Arts in Political Science, summa cum laude, Spanish Minor

Question:

4. Please provide a list of all requests to serve new data center load the Company has received over the last 12 months, including for each data center:

a. Location of the proposed data center;

b. Requested contract demand;

c. Any contract language for each data center addressing the items described in sub-question 1-3.a-h above (including the entirety of contracts addressing these terms, to the extent they exist);

d. Any determinations the Company has made for financial security measures and any "ramp up period[s]" for such data centers, along with the analyses, studies, and calculations used in making those determinations (including such analyses, studies, and calculations for a data center even if a final determination has not yet been made); and

e. Analyses, studies, and calculations the Company has conducted concerning an assessment of potential stranded asset costs and cost shifting for the data center. To the extent the Company might typically seek a Protective Order concerning material sought by this question and the other questions in this request, it is welcome to propose a draft of such a Protective Order for consideration.

Response:

a. The following chart sets forth the inquiries for potential service Consumers Energy has received in the last twelve months from potential data center customers. Note that these are inquiries, and do not represent commitments to take service from the Company. Please see attached.

Witness: Laura M. Connolly
Date: May 15, 2025

Id	Location	Load (MW)
1	East Central region	300
2	East Central region	400
3	South Central region	1,000
4	East Central region	300
5	Unknown	300
6	East Central region	300
7	Unknown	200
8	Unknown	Unknown
9	Unknown	200
10	Unknown	250
11	Southeasterly region	Unknown
12	East Central region	200
13	East Central region	1,000
14	East Central region	2,100
15	Southwest region	500
16	West region	300
17	Unknown	300
18	Unknown	500
19	Unknown	420
20	East region	100
21	Unknown	300
22	East region	700
23	Unknown	1,000

Witness: Laura M. Connolly
Date: May 15, 2025

Id	Location	Load (MW)
24	East Central region	300
25	Unknown	Unknown
26	Unknown	500
27	Unknown	Unknown
28	Unknown	60
29	South Central region	100
30	Unknown	70
31	Southwest region	Unknown
32	East region	500
33	Unknown	Unknown
34	South Central region	75
35	Southwest region	50
36	Southwest region	219
37	Unknown	Unknown
38	Unknown	1,200
39	Unknown	300
40	Southwest region	4
41	Unknown	300
42	Unknown	Unknown
43	Unknown	Unknown
44	Southeasterly region	100
45	Unknown	500
46	Southeasterly region	10

Witness: Laura M. Connolly
Date: May 15, 2025

Id	Location	Load (MW)
47	East Central region	300
48	East Central region	1,000
49	Unknown	1,000
50	Unknown	500
51	Unknown	Unknown
52	Unknown	500
53	Unknown	500
54	Unknown	600
55	Southeasterly region	Unknown
56	Unknown	Unknown
57	Unknown	145
58	Unknown	1,000
59	East region	100
60	East Central region	250
61	Unknown	500
62	Southeasterly region	500
63	Unknown	200
64	Unknown	900
65	East Central region	Unknown
66	Northeast region	100
67	Unknown	300

b. See response to a.

c. See response to U21859-AG-CE-0014

d. Financial security has not been evaluated for all inquiries. The Company has evaluated the financial security of some customers based on their publicly available credit rating. No financial calculations or analysis was performed.

e. The Company does not perform such a study for each inquiry.

Witness: Laura M. Connolly
Date: May 15, 2025

Id	Location	Load (MW)	Requested in-service year	50% of peak year	Peak demand reached year	Date of Inquiry	Description
A	East Central Region	400	As soon as possible	Unknown	Unknown	10/7/2024	Data Center
B	South Central Region	1,000	Q1 2026	Q2 2033	Q1 2040	10/4/2024	Data Center
C	Unknown	300	Unknown	Unknown	Unknown	11/6/2024	Data Center
D	East Central Region	300	As soon as possible	Unknown	Unknown	7/15/2024	Data Center
E	Unknown	200	As soon as possible	Unknown	Within 36 months	5/7/2024	Data Center
F	Southwest Region	Unknown	Unknown	Unknown	Unknown	12/3/2024	Data Center
G	Unknown	200	Unknown	Unknown	Unknown	11/19/2024	Data Center
H	Unknown	250	As soon as possible	Unknown	Unknown	3/10/2025	Data Center
I	East Central Region	1,000	As soon as possible	Unknown	Within 36 months	2/26/2025	Data Center
J	West Region	300	Q1 2029	Q4 2030	Q4 2033	3/1/2024	Data Center
K	Unknown	300	Q4 2029	Q2 2030	Q4 2033	6/6/2024	Data Center
L	East Region	100	Unknown	Unknown	Unknown	1/9/2025	Data Center
M	Unknown	300	Unknown	Unknown	Q1 2030	12/4/2024	Data Center
N	East Region	700	Unknown	Unknown	Unknown	2/4/2025	Data Center
O	Unknown	1,000	Within 2-3 years	Unknown	Within 5-10 years	2/28/2025	Data Center
P	East Central Region	300	Unknown	Unknown	Unknown	3/10/2025	Data Center
Q	Unknown	Unknown	Unknown	Unknown	Unknown	7/29/2024	Data Center
R	Unknown	500	Unknown	Unknown	Unknown	8/7/2024	Data Center
S	South Central Region	100	Unknown	Unknown	Unknown	10/4/2024	Data Center
T	Unknown	Unknown	Q1 2027	Unknown	Q1 2031	10/31/2024	Data Center
U	Southwest Region	50	Unknown	Unknown	Unknown	12/19/2024	Data Center
V	Unknown	1,200	Q1 2028	Q2 2029	Q4 2030	10/16/2024	Data Center
W	Unknown	300	Unknown	Unknown	Unknown	8/19/2024	Data Center

Id	Location	Load (MW)	Requested in-service year	50% of peak year	Peak demand reached year	Date of Inquiry	Description
X	Southwest Region	4	2024	2024	2024	7/25/2024	Data Center
Y	Unknown	300	Unknown	Unknown	Unknown	1/15/2025	Data Center
Z	Unknown	Unknown	Unknown	Unknown	Unknown	10/31/2024	Data Center
AA	Unknown	500	Unknown	Unknown	Unknown	9/10/2024	Data Center
AB	Unknown	1,000	Q1 2029	Unknown	Unknown	10/31/2024	Data Center
AC	Unknown	500	Q1 2026	Unknown	Q1 2029	7/12/2024	Data Center
AD	Unknown	Unknown	Unknown	Unknown	Unknown	10/29/2024	Data Center
AE	Unknown	500	Q3 2026	Q3 2027	Q3 2029	7/25/2024	Data Center
AF	Unknown	500	Unknown	Unknown	Unknown	10/10/2024	Data Center
AG	Unknown	600	Q4 2027	Unknown	2030	12/11/2024	Data Center
AH	Unknown	145	Unknown	Unknown	Unknown	7/31/2024	Data Center
AI	Unknown	1,000	2027	Unknown	Unknown	2/4/2025	Data Center
AJ	Southeasterly Region	500	Unknown	Unknown	Q1 2029	1/6/2025	Data Center
AK	Unknown	900	Q4 2027	Q4 2028	Q4 2029	9/11/2024	Data Center
AL	East Central	Unknown	Unknown	Unknown	Unknown	11/21/2024	Data Center

Question:

21859-DCC-CE-0014. Please refer to Connolly Direct at 4:7-8. “The Company has data center inquiries that total over 15 gigawatts of electric load in the economic development pipeline.” Please confirm it is possible that the 15 GW includes one or more customers submitting requests for multiple locations.

Response:

Confirmed.

Witness: Laura M. Connolly
Date: May 13, 2025

Question:

5. Please refer to the Direct Testimony of Laura M. Connolly, p. 9 lines 15-16. Provide the sizes in MW – or summary statistics of the sizes – of the Company's current Rate GPD customers.

Response:

See attached.

Witness: Laura M. Connolly
Date: May 30, 2025

Sales & Billing - Large Comm & Ind

					APR 2025 - APR 2025
					Billing Demand
Division		Rate Category		Contract Account	KW
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		1,129
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		3,957
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		3,133
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		12,918
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		2,765
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		6,858
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		3,744
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		1,400
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		163
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		6,670
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		3,277
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		7,107
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		15,114
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		1,014
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		2,569
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		3,978
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		3,247
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		1,835
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		5,779
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		7,862
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		22,915
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		9,408
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		1,273
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		15,658
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		6,048
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		6,636
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		1,066
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		7,344
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		87
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		1,768
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		1,536
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		1,365
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		3,416
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		1,394
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		545
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2		204
01	Electricity	Gen Ser Prim Rate GPD V2 IND	GPD_1230V2	Result	175,182
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		608

01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		383
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		46
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		160
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		53
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		235
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		0
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		219
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,955
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		655
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,073
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		912
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		585
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		177
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,202
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		84
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		156
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,726
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		50
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		553
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,540
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		124
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,440
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		280
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		423
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,371
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,500
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		442
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,722
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,736
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		998
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,210
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		215
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		674
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		916
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		804
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		386
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		449
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		61
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,250
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		616
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		497
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		482

01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		309
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		710
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		422
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01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,013
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		107
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		368
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,820
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		599
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,555
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		276
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		4,255
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		69
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		446
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		281
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,333
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		536
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,339
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		593
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		374
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,321
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		30
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		256
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,225
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,008
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		234
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,508
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		79
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		4,047
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		311
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		177
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		285
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,860
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		403
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		5,975
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		412
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,609
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		74
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,039
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		90
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,292
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		590
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,148

01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,636
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		211
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,690
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		454
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		455
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		347
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		228
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		638
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,472
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		530
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		301
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		308
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		3,410
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		916
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		320
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		120
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		516
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,190
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,074
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		352
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		92
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,823
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		309
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,665
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		323
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,640
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		38
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		927
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		335
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,267
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		860
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		153
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		50
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		406
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,256
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		674
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		395
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		130
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,139
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		134
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		737
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		201
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		564

01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		481
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		752
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,397
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		636
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,707
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,031
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,081
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,471
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		205
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		147
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,105
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		301
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		139
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		221
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		972
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		166
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		634
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		963
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		304
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		472
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,334
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		257
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		27
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,696
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		163
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,208
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		32
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		88
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		274
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		536
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		843
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		428
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		778
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		174
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,571
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		228
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		384
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,408
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		314
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		5,973
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,036
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		101
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		572

01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,667
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		202
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,690
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		795
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		425
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		887
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		755
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		821
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		277
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		634
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		881
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,094
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,759
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		518
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,633
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		3,560
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		377
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		4,080
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		441
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,344
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		842
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		190
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		323
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		3,525
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		494
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		2,150
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		47
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		714
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		808
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		948
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		21
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		245
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		81
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		37
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		161
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		58
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		379
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,267
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,642
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		44
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		47
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		49
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		112

01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		156
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		249
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		255
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		764
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		38
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		532
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		412
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		37
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		189
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		196
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		438
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		540
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,740
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		56
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		216
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		436
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		325
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		622
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,881
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		38
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		1,089
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		592
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		381
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		632
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		3,364
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3		12
01	Electricity	Gen Ser Prim Rate GPD V3 IND	GPD_1230V3	Result	202,972
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		21,289
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		4,712
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		3,859
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		10,161
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		3,293
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		27,331
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		5,184
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		9,173
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		941
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		3,825
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		21,437
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		4,173
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		3,986
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		5,622
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		9,861
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		28,358

01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		190
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1		16,289
01	Electricity	Gen Ser Primary Ind Rate GPD V1	GPD_1230V1	Result	179,684
01	Electricity	Gen Ser Primary Rate GPD V1	GPD_1220V1		7,419
01	Electricity	Gen Ser Primary Rate GPD V1	GPD_1220V1		5,184
01	Electricity	Gen Ser Primary Rate GPD V1	GPD_1220V1		4,685
01	Electricity	Gen Ser Primary Rate GPD V1	GPD_1220V1		5,276
01	Electricity	Gen Ser Primary Rate GPD V1	GPD_1220V1		5,490
01	Electricity	Gen Ser Primary Rate GPD V1	GPD_1220V1		2,369
01	Electricity	Gen Ser Primary Rate GPD V1	GPD_1220V1		2,753
01	Electricity	Gen Ser Primary Rate GPD V1	GPD_1220V1		5,230
01	Electricity	Gen Ser Primary Rate GPD V1	GPD_1220V1	Result	38,406
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		1,501
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		975
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		5,430
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		1,751
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		426
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		450
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		2,166
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		2,719
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		8,294
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		6,451
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		5,515
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		2,239
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		818
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		769
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		952
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		760
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		3,241
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		3,848
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		1,284
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		1,743
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		2,807
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		2,028
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		4,032
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		3,456
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		4,504
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		3,076
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		4,454
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		15,322
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		2,596
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2		346
01	Electricity	Gen Ser Primary Rate GPD V2	GPD_1220V2	Result	93,953

01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		235
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		156
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		344
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		255
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		838
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		211
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		847
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		332
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		153
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		97
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		256
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		47
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		743
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		639
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		791
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		639
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		90
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		231
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		398
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		25
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		132
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		286
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		336
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		127
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		310
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		411
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		177
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		216
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		839
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		927
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		269
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		311
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		181
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		92
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		518
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		245
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		213
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		41
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		180
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,797
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		141
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		320
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,018

01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		567
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		186
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		107
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		714
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		135
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		668
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		773
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,587
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		781
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		384
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		58
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		587
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		400
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		852
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		93
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		708
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,394
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		102
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		230
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		206
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		337
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		316
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		786
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		153
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		638
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		377
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		482
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		948
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		636
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		191
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		181
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		83
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		172
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		285
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,771
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		920
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		106
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		517

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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		320
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		589
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		3,483
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		979
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		255
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		233
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		60
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		680
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		197
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		257
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		223
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		260
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		196
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		282
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		241
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		756
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		687
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		156
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,068
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		105
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		198
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		77
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		189
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		453
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		119
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		291
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		138
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		453

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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		145
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		568
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		288
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		153
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		801
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		787
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		645
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		567
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		8
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		776
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		194
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		881
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		175
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		3,779
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		372
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		215
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		634
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		326
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		144
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		665
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		174
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		709
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		957

01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		634
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		379
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		268
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		389
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		258
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,002
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		808
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		2,638
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		31
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		171
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		49
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		2,060
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		632
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		311
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		657
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		130
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		2,088
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		116
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		134
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		473
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		3,537
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		345
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		284
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		130
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		481
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		210
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		84
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,549
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		4,026
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		867
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		719
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		111
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		588
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		84
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		270

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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		664
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		637
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		162
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		547
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,142
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		441
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		355
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		53
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		141
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		222
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		152
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		107
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		204
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		787
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,138
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		158
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,196
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		366
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		95
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		51
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		35
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		912
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,068
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		125
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		743
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		591
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		564
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		200
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		26
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		135
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		184
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		110
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		505
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		237
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		237
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		225
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		213
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,385
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		334
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		147
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		833
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		158
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		734
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		78
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		99
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		308
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		3,406
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		113

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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		445
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		94
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		664
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		2,511
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		105
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		236
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		125
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,586
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,043
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		123
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		228
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		97
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		746
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		282
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		114
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,187
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		916
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		570
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		98
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		243
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		766
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		111
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		152
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		118
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		170
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		160
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		46
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,551
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		860
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		188
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		52
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		553
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		231
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		484

01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		530
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		4,954
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		194
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		860
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		114
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		305
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		643
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		351
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		221
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		682
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		285
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		572
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		716
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		167
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		141
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		348
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		303
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		3,986
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		165
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		341

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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		258
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		270
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		937
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		534
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		161
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		4,654
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		589
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		257
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		2,769
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		644
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		580
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		432
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		193
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		465
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		143
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		390
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		795
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		324
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		611
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		132
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		867
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		2,020
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		828
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		429
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		696
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		577
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		22
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		642
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		73
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		755

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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		484
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		590
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		883
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		2,058
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		445
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		125
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		187
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		227
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		750
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		982
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		80
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		764
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		490
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		482
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		881
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		726
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		102
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		196
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		32
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		420
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		3,093
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		156
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,505

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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		524
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		598
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		234
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		196
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		118
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		46
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		485
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		312
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		535
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		151
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		323
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,071
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		174
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		251
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		397
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		2,160
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		88
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		80
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		133
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,120
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		528
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		92
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		33
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		158
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		103
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		3,675
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		622
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		114
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		132
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		628
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		29
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		89
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		353
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		230
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		354
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		162

01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		62
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		513
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		370
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		365
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		267
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		250
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		2,281
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		547
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		252
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		205
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		808
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		220
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		286
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		67
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		191
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		302
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		3,571
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		449
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		697
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		369
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		180
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		277
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,217
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,375
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		35
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		208
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		86
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		144
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		99
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		49
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		178
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		291
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		35
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		979
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		174
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		99
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		56
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		217
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		783
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		595
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		356
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		887
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		72

01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		426
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		269
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		26
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		147
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		226
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		262
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		378
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		503
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		82
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		17
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		124
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		1,164
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		475
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		61
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		628
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		478
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		101
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		261
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		3,203
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		32
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		201
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		38
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		66
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		331
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		26
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		62
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		255
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		30
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		914
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		175
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		621
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		154

01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		48
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		79
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		0
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		4
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01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		108
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		34
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		240
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		103
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3		36
01	Electricity	Gen Ser Primary Rate GPD V3	GPD_1220V3	Result	340,191
01	Electricity	Result			1,030,388
Overall Result					1,030,388

Question:

11. Please describe in detail any planning that Consumers has undertaken to fulfill its obligation pursuant MCL 205.54ee and 205.94cc to "identify and, if necessary, develop tariffs, contract, and other mechanisms that support the enterprise data center in making [its 90% clean energy] demonstration."

Response:

Objection of Counsel: Consumers Energy Company objects to this discovery request on the grounds that said request is not relevant to a determination of reasonable modifications of the Company's Rate GPD tariff to allow for certain customer protections. Subject to this objection, and without waiving it, Consumers Energy responds as follows:

The Company will consider future load growth and clean energy requirements within the integrated resource plan process.

Witness: Laura M. Connolly
Date: April 30, 2025

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

*****

In the Matter of the Application of **Consumers Energy Company** for Ex Parte Approval of Certain Amendments to Rate GPD.	)))))	**Case No. U-21859**

PROOF OF SERVICE

STATE OF SOUTH CAROLINA)
) ss.
COUNTY OF BERKELEY)

Summer R. Dukes, the undersigned, being first duly sworn, deposes and says that she is a Paralegal at Potomac Law Group PLLC and that on the 12th day of June, 2025 she served a copy of the Direct Testimony and Exhibits of John D. Albers on behalf of the Michigan Energy Innovation Business Council, the Institute for Energy Innovation, and Advanced Energy United, upon those individuals listed on the attached Service List via email.

Summer Dukes
Digitally signed by Summer Dukes
Date: 2025.06.12 16:32:54 -04'00'

Summer R. Dukes

Administrative Law Judge
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