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January 26, 2010

Darcy L. Endo-Omoto
Vice President
Government & Community Affairs

PUBLIC UTILITIES
COMMISSION

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FILED

The Honorable Chairman and Members of
the Hawaii Public Utilities Commission
465 South King Street
Kekuanaoa Building, 1st Floor
Honolulu, Hawaii 96813

Dear Commissioners:

Subject: Hawaiian Electric Company, Inc.,
Hawaii Electric Light Company, Inc.
Maui Electric Company, Limited
2009 Net Energy Metering Status Report

Hawaiian Electric Company, Inc., Hawaii Electric Light Company, Inc. and Maui Electric Company, Limited respectfully submit their 2009 Net Energy Metering Status Report, which provides the total number of installations and the total rated generating capacity of net metered customer facilities in each of their service territories.

If you have any questions on this matter, please call Dean Matsuura at 543-4622.

Sincerely,

Attachment

cc: Division of Consumer Advocacy

Net Energy Metering Status Report

**Hawaiian Electric Company, Inc.
Hawaii Electric Light Company, Inc.
Maui Electric Company, Limited**

December 31, 2009

Background

Sections 269-101 to 269-111, Hawaii Revised Statutes, as amended, require net energy metering ("NEM") to be available to eligible customer-generators with a capacity of not more than 50 kilowatts until the total rated generating capacity of eligible customers equals 0.5 percent of the electric utility's system peak demand. Systems must meet all applicable safety and performance standards and systems 10 kilowatts or less are exempt from additional requirements to install additional controls, perform or pay for additional tests or purchase additional liability insurance. Hawaiian Electric Company, Inc. ("HECO"), Hawaii Electric Light Company, Inc. ("HELCO") and Maui Electric Company, Limited ("MECO") (collectively, "the Utilities") were among the supporters of this legislation.

The NEM law states that eligible customers who own and operate a solar, wind turbine, biomass, or hydroelectric energy generating facility, or a hybrid system consisting of two or more of these facilities, with a capacity of not more than 50 kilowatts, shall be credited at the retail rate (of the rate class the customer is normally assigned to) for electrical energy generated by the eligible customer-generator and fed back to the electric grid. Over a monthly billing period, the difference (i.e., net) between the customer-generated electrical energy and the electrical energy supplied through the electric grid is determined. In essence, customers are able to "bank" the excess renewable energy they generate and feed into the Utilities' grid for later use.

The Utilities are required to do a twelve-month reconciliation of the net electricity provided by the utility with the electricity generated by the customer-generator and any unused monetary credits from the customer-generator carried over from prior months since the last twelve-month reconciliation period, and provide in each regular bill information on net electricity production and consumption, monetary balances, and credits. Excess electricity generated by the customer-generator in each billing period is carried over to the next month as a monetary credit within each twelve-month period.

On April 10, 2006, the Public Utilities Commission of the State of Hawaii ("Commission") issued Order No. 22380 in Docket No. 2006-0084, opening an investigative proceeding to address whether the Commission should increase: (1) the maximum capacity of eligible customer-generators to more than 50 kilowatts; and (2) the total rated generating capacity produced by eligible customer-generators to an amount above 0.5 percent of an electric utility's system peak demand.

On September 21, 2006, the Commission issued Order No. 22884 in Docket No. 2006-0084 to amend the Stipulated Procedural Order (filed on August 14, 2006) to include whether the Commission should adopt, modify, or decline to adopt, in whole or in part, the NEM standard articulated in PURPA as amended by the Energy Policy Act of 2005.

On March 13, 2008, the Commission issued Decision and Order ("D&O") No. 24089 approving the stipulated agreement reached by the parties of the docket submitted by the Utilities on September 17, 2007. The Commission approved the stipulated agreement reached by the parties that:

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- Increases the maximum size of the eligible customer-generator that can qualify for a NEM agreement from 50 kW to 100 kW;
- Increases the total rated generating capacity produced by eligible customer-generators from 0.5% to 1.0% of the utility's system peak demand;
- Reserves 40%, 50%, and 50% of the total rated generating capacity produced by eligible customer-generators for HECO, HELCO, and MECO, respectively, for residential and smaller commercial NEM customers (system sizes of 10 kW or less);
- Utilizes the Integrated Resource Planning ("IRP") process to evaluate impacts to the Utilities' systems and determine further adjustments to the NEM system size and cap limits (limits re-examined on an annual basis); and
- Recommends that the Commission not adopt or modify the standard for NEM as articulated in the Public Utility Regulatory Policies Act of 1978 ("PURPA") as amended by the Energy Policy Act of 2005.

In addition to the agreed-upon terms of the stipulation, the Commission ordered that the Utilities design and propose a NEM Pilot Program for the Commission's review and approval, which will allow on a trial basis a limited number of larger generating units for NEM.

On April 28, 2008, the Utilities filed with the Commission a proposed NEM Pilot Program to investigate the impacts of large NEM systems on the electric grid. Multiple discussions were held with the Hawaii Renewable Energy Alliance ("HREA") and the Hawaii Solar Energy Association ("HSEA") to gain feedback on the proposed program so that industry considerations are adequately addressed.

Based on a review in mid 2008 of approved, pending, and planned systems expected to apply for NEM status, it was forecasted that these systems would exceed the recently-approved NEM system caps for HELCO and MECO by the end of 2008. Consistent with the NEM review process within IRP established by D&O 24089, adjustments to the NEM system cap were proposed to the HELCO and MECO Integrated Resource Planning ("IRP") Advisory Groups in July 2008. There were no objections to HELCO and MECO proposals. As a result, on September 30, 2008, HECO and the Division of Consumer Advocacy of the State of Hawaii Department of Commerce and Consumer Affairs ("Consumer Advocate") filed stipulations for Commission approval under the HELCO IRP-3 docket (Docket No. 04-0046) and MECO IRP-3 docket (Docket No. 04-0077) on proposed changes to the NEM system caps for HELCO and MECO, respectively.

On December 3, 2008, in response to a request by the Commission (in a letter dated October 10, 2008) to file the stipulations in the NEM docket (Docket No. 2006-0084), HELCO, MECO and the Consumer Advocate filed their stipulations on the proposed changes to the NEM system caps for HELCO and MECO.

On December 26, 2008, the Commission issued an Order Approving, in Part, and Denying, in Part, Stipulations filed on December 3, 2008 that:

- The increased NEM limits for HELCO and MECO, as proposed in the Stipulations, are approved.
 - NEM system cap from 1% to 3% of system peak demand; and

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- HELCO and MECO will reserve 40% of the NEM system cap for NEM systems of 10 kW or less and 60% of the NEM system cap for systems larger than 10 kW.
- The review of future increases in NEM system caps in IRP processes is denied due to the closing of IRP dockets by the Commission.

The parties to Docket No. 2006-0084 shall submit a stipulated proposed plan to address the Utilities' and Consumer Advocate's NEM agreement as set forth by the Energy Agreement and inform the Commission of any new review process for considering future increases to the NEM limits.

New Developments

NEM Pilot Program

Since the filing of the NEM Pilot Program in April 2008, multiple discussions were held with the Hawaii Renewable Energy Alliance ("HREA") and the Hawaii Solar Energy Association ("HSEA") to obtain feedback on the proposed program so that industry considerations are adequately addressed. On September 25, 2009, the Commission issued its Feed-in Tariff ("FIT") D&O in Docket No. 2008-0273. After the issuance of the FIT D & O, HREA, HSEA, and the Utilities (collectively known as "Parties") met to discuss the implications of the FIT D & O on the NEM Pilot Program. After significant consideration and discussion, the Parties concluded a number of significant developments have occurred since the NEM Pilot Program was envisioned. There are now a number of planned and on-going studies which are likely to provide a more accurate gauge of distributed generation growth and achieve the same benefits and lessons that were contemplated by conducting a NEM Pilot Program using federal funds and industry involvement. A stipulated¹ letter to the Commission was submitted on December 18, 2009 on the status of the proposed NEM Pilot Program informing the Commission that the Utilities' NEM Pilot Program, as proposed on April 28, 2008, is no longer necessary. A Commission decision on the NEM Pilot Program is pending.

Energy Agreement

On October 20, 2008, the Governor of the State of Hawaii, the State of Hawaii Department of Business, Economic Development and Tourism, the Division of Consumer Advocacy of the Department of Commerce and Consumer Affairs, and the Utilities entered into an Energy Agreement. Among the numerous commitments contained in the Energy Agreement was the agreement that there should be no system-wide caps on NEM, and instead, distributed generation, including NEM, feeding into a circuit shall be limited on a per-circuit basis to no more than 15% of peak circuit demand for all distribution-level circuits of 12 kV or lower. For circuits approaching the 15% limit, the Utilities will perform a circuit-specific analysis to determine if the limit can be increased. In addition, the Energy agreement states that NEM will be replaced with an appropriate feed-in tariff and new NEM installations shall be required to utilize time-of-use metering equipment and rates. (See Energy Agreement Section 19, Net Energy Metering.) On August 14, 2009, the Utilities and the Consumer Advocate submitted their Proposed Plan to Address NEM, as set forth in the Energy Agreement. The Utilities

¹ See letter from the Consumer Advocate, Hawaiian Electric Companies, HREA, and HSEA (collectively referred to as the "NEM Parties") to the Commission in Docket No. 2006-0084, filed December 18, 2009.

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propose to move forward on the planned removal of the system-wide cap for NEM. A stipulation² between the Utilities and the Consumer Advocate was filed with the Commission on January 7, 2010. A Commission decision on the Stipulation is pending.

Another commitment contained in the Energy Agreement, was the agreement to replace the current Integrated Resource Planning process with a new Clean Energy Scenario Planning ("CESP") Process. (See Energy Agreement Section 32, CESP.) On February 11, 2009, the Utilities and the Consumer Advocate filed a stipulated letter requesting that any potential increases to the Utilities NEM limits be reviewed in each of the Utilities' CESP process in the same manner as the Parties agreed in their stipulation filed on September 17, 2007 and approved by D&O No. 24089. On October 27, 2009, pursuant to the Commission's March 25, 2009 letter, the Utilities provided additional briefing³ on a proposed process to consider any future increases to the existing Utilities' NEM limits.

Status

The following table provides the status of NEM in the HECO, HELCO, and MECO service territories as of December 31, 2009. In addition, a report on the estimates of the rate and revenue impact of NEM participation is shown in Appendix A.

NEM Status as of 12/31/09

	Information packets sent	No. of Installations ⁴	Installed kW ⁵	NEM System Cap ⁶ , kW
HECO				
2001	151	1	3.60	5,955
2002	12	1	2.10	6,020
2003	49	8	11.74	6,210
2004	15	3	7.90	6,405
2005	5	0	0	6,150
2006	23	10	74.28	6,330
2007	67	73	387.29	6,080
2008	132	221	2,362	11,860
2009	111	511	2,430	12,130
Total (HECO)	565	828	5,279	

² A stipulation between the Utilities and the Consumer Advocate was filed with the Commission on January 7, 2010 recommending the removal of the Net Energy Metering System Cap with the adoption of the Rule 14H modifications and the establishment of Reliability Standards. The maximum size of eligible customer-generator that qualifies for a NEM arrangements remains unchanged at 100 kW.

³ See letter from the Utilities to the Commission dated October 27, 2009, Docket No. 2006-0084 - Net Energy Metering (NEM).

⁴ Completed systems (i.e., NEM Agreements completed).

⁵ Installed kW reflects rated generating capacity installed in the year noted. Includes system expansions.

⁶ Based on 0.5% of system peak in 2001-2007, 1.0% of system peak in 2008-2009 for HECO, and 3% of system peak in 2008-2009 for HELCO and MECO. Based on Net System Peak for HECO, HELCO, and MECO-Maui and Gross System Peak for MECO-Molokai and MECO-Lanai.

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Hawaiian Electric Company, Inc.
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NEM Status as of 12/31/09 (cont.)

	Information packets sent	No. of Installations ⁴	Installed kW ⁵	NEM System Cap ⁶ , kW
HELCO				
2001	122	2	10.20	871
2002	25	3	4.73	890
2003	13	6	28.00	934
2004	12	4	8.84	972
2005	17	10	58.27	985
2006	12	35	299.57	1,007
2007	24	35	263.15	1,017
2008	23	115	782.1	5,946
2009	30	265	1,994.61	5,838
Total (HELCO)	278	475	3,449.47	
MECO				
2001	49	2	8.20	993
2002	19	5	8.80	1,006
2003	24	3	13.00	1,047
2004	29	8	21.60	1,091
2005	22	16	92.15	1,068
2006	49	50	233.47	1,091
2007	13	64	359.81	1,081
2008	15	135	953.82	6,171
2009	0	298	2,337.47	6,316.5
Total (MECO)	220	581	4,028	
TOTAL	1,063	1884	12,756	

⁴ Completed systems (i.e., NEM Agreements completed).

⁵ Installed kW reflects rated generating capacity installed in the year noted. Includes system expansions.

⁶ Based on 0.5% of system peak in 2001-2007, 1.0% of system peak in 2008-2009 for HELCO, and 3% of system peak in 2008-2009 for HELCO and MECO. Based on Net System Peak for HELCO, HELCO, and MECO-Maui and Gross System Peak for MECO-Molokai and MECO-Lanai.

Appendix A

The attached pages provide illustrative estimates of lost contributions to fixed cost in 2010 and associated estimated rate impact, based on NEM installations as-of year-end 2009. There is no bill impact on non-NEM customers until HECO, HELCO, or MECO propose and receive Commission approval to adjust rates upward to cover the NEM lost contribution to fixed cost. At that point, any rate adjustment impacts both NEM customers (to the extent that they pay for kWh) and non-NEM customers.

HECO

Estimated Lost Contribution to Fixed Cost in 2010, based on NEM installations as-of year-end 2009

Rate	kW	Total Hours in Year ¹	Estimated Capacity Factor ²	Total Lost kWh/yr	Base Energy Rate ³ , cents/kWh	Effective 2007 Interim Increase ⁴ , %	Effective 2009 Interim Increase ⁴ , %	Eff. Base Energy Rate, cents/kWh <i>H = E + (E * F) + (E * G)</i>	Production Energy Rate ⁵ , cents/kWh	Lost Contribution to Fixed Cost, cents/kWh	Total Lost Contribution to Fixed Cost, \$/Yr
	<i>A</i>	<i>B</i>	<i>C</i>	<i>D = A * B * C</i>	<i>E</i>	<i>F</i>	<i>G</i>		<i>I</i>	<i>J = H - I</i>	<i>K = D * J / 100</i>
R	1,929.0	8,760	16.0%	2,703,686	17.1896	7.09%	5.83%	19.4105	9.6880	9.7225	\$262,866
G	450.9	8,760	16.0%	631,981	16.4205	7.01%	3.59%	18.1611	9.7300	8.4311	\$53,283
H	14.0	8,760	16.0%	19,622	13.4312	7.21%	6.37%	15.2552	9.7150	5.5402	\$1,087
J	2,885.5	8,760	16.0%	4,044,317	13.0460	5.93%	6.33%	14.6454	9.7240	4.9214	\$199,037
Total	5,279.4			7,399,606							\$516,273

Estimated Impact on Rates in 2010, based on NEM installations as-of year-end 2009

Rate	Total Lost Contribution to Fixed Cost, \$/Yr	Forecast 2010 Sales ⁶ kWh/Yr	Estimated Impact on Rates, ¢/kWh
	<i>L = K</i>	<i>M</i>	<i>N = (L / M) * 100</i>
R	\$262,866	2,010,100,000	0.01
G	\$53,283	379,800,000	0.01
H	\$1,087	28,700,000	0.00
J	\$199,037	2,056,400,000	0.01
Total	\$516,273	4,475,000,000	

Notes:

- 1 There are 8760 hour in a non-leap year, and 8768 hours in a leap year.
- 2 Source: Estimated value
- 3 Source: Base Energy Rates, from Docket 04-01113 (HECO 2005 Test Year)
- 4 Source: Effective Rate Summaries filed 01/05/2010
- 5 Source: Most-recently approved cost-of-service calculation, from Docket 04-0113 (HECO 2005 Test Year)
- 6 Source: HECO Forecast and Research Division

HELCO

Estimated Lost Contribution to Fixed Cost in 2010, based on NEM installations as-of year-end 2009

Rate	kW	Total Hours in Year ¹	Estimated Capacity Factor ²	Total Lost kWh/yr	Base Energy Rate ³ , cents/kWh	Effective Interim Increase ⁴ , %	Eff. Base Energy Rate, cents/kWh	Production Energy Rate ⁵ , cents/kWh	Lost Contribution to Fixed Cost, cents/kWh	Total Lost Contribution to Fixed Cost, \$/Yr
	A	B	C	D = A * B * C	E	F	G = E * (E * F)	H	I = G - H	J = D * I / 100
R/E	1,432	8,760	16.0%	2,006,531	19.1370	10.80%	21.2038	7.9480	13.2558	\$265,982
G	656	8,760	16.0%	919,450	21.3604	10.80%	23.6673	7.9590	15.7083	\$144,430
J	1,144	8,760	16.0%	1,603,430	15.6078	10.80%	17.2934	7.9440	9.3494	\$149,911
H	7	8,760	16.0%	9,811	15.9189	10.80%	17.6381	7.9540	9.6841	\$950
P	210	8,760	16.0%	294,897	13.7731	10.80%	15.2606	7.7740	7.4866	\$22,078
Total	3,449			4,834,119						\$583,351

Estimated Impact on Rates in 2010, based on NEM installations as-of year-end 2009

Rate	Total Lost Contribution to FC, \$/Yr	Forecast 2010 Sales ⁶ kWh/Yr	Estimated Impact on Rates, ¢/kWh
	K = J	L	M = K / L * 100
R/E	\$265,982	427,100,000	0.06
G	\$144,430	98,900,000	0.15
J	\$149,911	329,400,000	0.05
H	\$950	11,600,000	0.01
P	\$22,078	250,800,000	0.01
Total	\$583,351	1,117,800,000	

Notes:

- 1 There are 8760 hour in a non-leap year, and 8768 hours in a leap year.
- 2 Source: Estimated value
- 3 Source: Base Energy Rates, from Docket 99-0207 (HELCO 2000 Test Year)
- 4 Source: Effective Rate Summaries filed 01/05/2010
- 5 Source: Most-recently approved cost-of-service calculation, from Docket 99-0207 (HELCO 2000 Test Year)
- 6 Source: HELCO Rate Case Docket No. 2009-0164 (HELCO 2010 Test Year)

MECO - Maui Division

Estimated Lost Contribution to Fixed Cost in 2010, based on NEM installations as-of year-end 2009

Rate	kW	Total Hours in Year ¹	Estimated Capacity Factor ²	Total Lost kWh/yr	Base Energy Rate ³ , cents/kWh	Effective Interim Increase ⁴ , %	Eff. Base Energy Rate, cents/kWh	Production Energy Rate ⁵ , cents/kWh	Lost Contribution to Fixed Cost, cents/kWh	Total Lost Contribution to Fixed Cost, \$/Yr
	<i>A</i>	<i>B</i>	<i>C</i>	<i>D = A * B * C</i>	<i>E</i>	<i>F</i>	<i>G = E + (E * F)</i>	<i>H</i>	<i>I = G - H</i>	<i>J = D * I / 100</i>
R/E	1,792.90	8,760	16.0%	2,512,929	13.4231	7.31%	14.4043	4.6370	9.7673	\$245,445
G	459.20	8,760	16.0%	643,615	14.5656	7.31%	15.6303	4.6620	10.9683	\$70,594
J	1,350.54	8,760	16.0%	1,892,917	11.8802	7.31%	12.7486	4.6650	8.0836	\$153,016
H	22.46	8,760	16.0%	31,480	11.9675	7.31%	12.8423	4.6560	8.1863	\$2,577
P	86.41	8,760	16.0%	121,112	9.8266	7.31%	10.5449	4.6080	5.9369	\$7,190
Total	3,711.51			5,202,053						\$478,822

Estimated Impact on Rates in 2010, based on NEM installations as-of year-end 2009

Rate	Total Lost Contribution to FC, \$/Yr	Forecast 2010 Sales ⁶ kWh/Yr	Estimated Impact on Rates, ¢/kWh
	<i>K = J</i>	<i>L</i>	<i>M = K / L * 100</i>
R/E	\$245,445	383,898,000	0.06
G	\$70,594	82,167,000	0.09
J	\$153,016	232,180,000	0.07
H	\$2,577	15,641,000	0.02
P	\$7,190	355,422,000	0.00
Total	\$478,822	1,069,308,000	

Notes:

- 1 There are 8760 hour in a non-leap year, and 8768 hours in a leap year.
- 2 Source: Estimated value
- 3 Source: Base Energy Rates, from Docket 97-0346 (MECO 1999 Test Year)
- 4 Source: Effective Rate Summaries filed 01/05/2010
- 5 Source: Most-recently approved cost-of-service calculation, from Docket 97-0346 (MECO 1999 Test Year)
- 6 Source: MECO Rate Case, Docket No. 2009-0163 (MECO 2010 Test Year)

MECO - Lanai Division

Estimated Lost Contribution to Fixed Cost in 2010, based on NEM installations as-of year-end 2009

Rate	kW	Total Hours in Year ¹	Estimated Capacity Factor ²	Total Lost kWh/yr	Base Energy Rate ³ , cents/kWh	Effective Interim Increase ⁴ , %	Eff. Base Energy Rate, cents/kWh	Production Energy Rate ⁵ , cents/kWh	Lost Contribution to Fixed Cost, cents/kWh	Total Lost Contribution to Fixed Cost, \$/Yr
	<i>A</i>	<i>B</i>	<i>C</i>	<i>D = A * B * C</i>	<i>E</i>	<i>F</i>	<i>G = E + (E * F)</i>	<i>H</i>	<i>I = G - H</i>	<i>J = D * I / 100</i>
R/E	22.73	8,760	16.0%	31,858	18.0648	6.23%	19.1902	9.0670	10.1232	\$3,225

Estimated Impact on Rates in 2010, based on NEM installations as-of year-end 2009

Rate	Total Lost Contribution to FC, \$/Yr	Forecast 2010 Sales ⁶ kWh/Yr	Estimated Impact on Rates, ¢/kWh
	<i>K = J</i>	<i>L</i>	<i>M = K / L * 100</i>
R/E	\$3,225	7,166,000	0.05

Notes:

- 1 There are 8760 hour in a non-leap year, and 8768 hours in a leap year.
- 2 Source: Estimated value
- 3 Source: Base Energy Rates, from Docket 97-0346 (MECO 1999 Test Year)
- 4 Source: Effective Rate Summaries filed 01/05/2010
- 5 Source: Most-recently approved cost-of-service calculation, from Docket 97-0346 (MECO 1999 Test Year)
- 6 Source: MECO Rate Case, Docket No. 2009-0163 (MECO 2010 Test Year)

MECO - Molokai Division

Estimated Lost Contribution to Fixed Cost in 2010, based on NEM installations as-of year-end 2009

Rate	kW	Total Hours in Year ¹	Estimated Capacity Factor ²	Total Lost kWh/yr	Base Energy Rate ³ , cents/kWh	Effective Interim Increase ⁴ , %	Eff. Base Energy Rate, cents/kWh	Production Energy Rate ⁵ , cents/kWh	Lost Contribution to Fixed Cost, cents/kWh	Total Lost Contribution to Fixed Cost, \$/Yr
	A	B	C	D = A * B * C	E	F	G = E + (E * F)	H	I = G - H	J = D * I / 100
R/E	104,500	8,760	16.0%	146,467	17.4383	6.82%	18.6276	5.4080	13.2196	\$19,362
G	42,320	8,760	16.0%	59,316	23.7929	6.82%	25.4156	5.4380	19.9776	\$11,850
J	96,960	8,760	16.0%	135,899	16.9081	6.82%	18.0612	5.4330	12.6282	\$17,162
H	50,295	8,760	16.0%	70,493	14.0975	6.82%	15.0589	5.4150	9.6439	\$6,798
Total	294,075			412,175						\$55,172

Estimated Impact on Rates in 2010, based on NEM installations as-of year-end 2009

Rate	Total Lost Contribution to FC, \$/Yr	Forecast 2010 Sales ⁶ kWh/Yr	Estimated Impact on Rates, ¢/kWh
	K = J	L	M = K / L * 100
R/E	\$19,362	11,668,000	0.17
G	\$11,850	3,522,000	0.34
J	\$17,162	7,093,000	0.24
H	\$6,798	1,379,000	0.49
Total	\$55,172	23,662,000	

Notes:

- 1 There are 8760 hour in a non-leap year, and 8768 hours in a leap year.
- 2 Source: Estimated value
- 3 Source: Base Energy Rates, from Docket 97-0346 (MECO 1999 Test Year)
- 4 Source: Effective Rate Summaries filed 01/05/2010
- 5 Source: Most-recently approved cost-of-service calculation, from Docket 97-0346 (MECO 1999 Test Year)
- 6 Source: MECO Rate Case, Docket No. 2009-0163 (MECO 2010 Test Year)