

FILED
January 27, 2021
INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF THE CITY OF CRAWFORDSVILLE,)
INDIANA, BY AND THROUGH ITS MUNICIPAL)
ELECTRIC UTILITY, CRAWFORDSVILLE)
ELECTRIC LIGHT AND POWER, FOR)
APPROVAL OF A NEW SCHEDULE OF RATES) CAUSE NO. 45420
AND CHARGES FOR ELECTRIC SERVICE AND)
FOR APPROVAL TO MODIFY ITS ENERGY COST)
ADJUSTMENT PROCEDURES)

PRE-FILED VERIFIED SETTLEMENT TESTIMONY OF
JOSEPH A. MANCINELLI
AND ATTACHMENTS JAM-7 THROUGH JAM-11
ON BEHALF OF PETITIONER
CRAWFORDSVILLE ELECTRIC LIGHT & POWER

PETITIONER'S EXHIBIT 11

JANUARY 27, 2021

Respectfully Submitted,



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**SETTLEMENT TESTIMONY OF
JOSEPH A. MANCINELLI**

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1 **I. INTRODUCTION**

2 **Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Joseph A. Mancinelli. I am a Director and President Emeritus of NewGen
4 Strategies and Solutions, LLC ("NewGen"). My business address is 225 Union Blvd,
5 Suite 305, Lakewood, Colorado 80228.

6 **Q2. ARE YOU THE SAME JOSEPH A. MANCINELLI THAT SUBMITTED**
7 **DIRECT TESTIMONY IN THIS PROCEEDING ON BEHALF OF**
8 **CRAWSFORDSVILLE ELECTRIC LIGHT & POWER ("CEL&P" OR THE**
9 **"UTILITY")?**

10 A. Yes.

11 **Q3. WHAT IS THE PURPOSE OF YOUR SETTLEMENT TESTIMONY?**

12 A. The purpose of my testimony is to discuss certain elements of the Stipulation and
13 Settlement Agreement ("Settlement") between CEL&P and the Indiana Office of the
14 Utility Consumer Counselor ("OUCC") (together, the "Settling Parties"). It is my opinion
15 that the Settlement terms represent an equitable compromise between the Parties in this
16 proceeding. I will discuss the settlement process and key Settlement terms pertaining to
17 the revenue requirement by class, derived from the settlement cost of service study
18 ("SCOSS") and rate design. The SCOSS can be found in Attachment JAM-7.

19 **II. SETTLEMENT PROCESS**

20 **Q4. PLEASE DESCRIBE THE SETTLEMENT PROCESS.**

21 A. The settlement process included extensive negotiations between CEL&P and the OUCC.
22 The Settling Parties exchanged several settlement proposals and responses, participated in

1 conference calls, and shared analyses. The Settling Parties recognized the uncertainty
2 associated with litigation and understood that a well-reasoned compromise between their
3 various positions would result in an acceptable outcome that avoided the uncertainty and
4 expense of a fully litigated case. As a result, the Settling Parties successfully addressed
5 and navigated difficult issues and varying opinions as presented in their respective direct
6 testimonies. Multiple term sheets were developed and reviewed, with a great deal of
7 information exchanged. The Settling Parties agreed on a lower total system revenue
8 requirement than originally proposed by CEL&P, an associated lower revenue
9 requirement by class, a two step phase-in of rate increase tailored to specific rate classes
10 and associated rate design.

11 **III. REVENUE REQUIREMENT BY CUSTOMER CLASS**

12 **Q5. PLEASE DESCRIBE THE IMPACT OF THE SETTLEMENT AGREEMENT**
13 **ON THE REVENUE REQUIREMENT BY CUSTOMER CLASS.**

14 A. Using the Settlement Revenue Requirement discussed by Ms. Jennifer Wilson, the
15 October 23, 2020 Corrected Cost of Service study ("October COSS") was updated. The
16 update included changing the appropriate system revenue requirement line items that
17 reflect settlement adjustments and dividing the originally proposed single General Power
18 ("Original GP") rate class into a small and large group of customers. I will describe the
19 reasoning behind this split later in my testimony. Given these changes, the October COSS
20 was re-run. Updated SCOSS results compared to the October COSS are summarized in
21 Table JAM-S1 below.

Table JAM-S1
SCOSS Compared to October COSS ⁽¹⁾

Line No.	Customer Class	10/2020 COSS Corrected (\$)	Settlement COSS (\$)	Difference (\$)	Difference (%)
1	Residential Service	\$11,858,907	\$11,235,580	(\$623,327)	(5.26%)
2	General Power <= 10 kW	N/A	\$1,264,725	N/A	N/A
3	General Power > 10 kW and < 50 kW	N/A	\$3,999,522	N/A	N/A
4	Subtotal General Power Service	\$5,178,467	\$5,264,247	\$85,780	1.66%
5	Municipal General Power <= 10 k	N/A	\$32,368	N/A	N/A
6	Municipal General Power > 10 kW and < 50 kW	N/A	\$230,311	N/A	N/A
7	Subtotal Municipal General Power Service	\$264,914	\$262,679	(\$2,235)	(0.84%)
8	General Power Consolidated Classes				
9	General Power <= 10 kW	N/A	\$1,297,094	N/A	N/A
10	General Power > 10 kW and < 50 kW	N/A	\$4,229,832	N/A	N/A
11	General Power <= 50 kW	\$5,443,382	\$5,526,926	\$83,544	1.53%
12	Primary Power Service	\$22,904,763	\$21,978,672	(\$926,091)	(4.04%)
13	Traffic Signal Service	\$15,445	\$14,590	(\$856)	(5.54%)
14	Outdoor Lighting Service	\$80,943	\$76,911	(\$4,032)	(4.98%)
15	Municipal Street Lighting Service	\$277,187	\$257,941	(\$19,247)	(6.94%)
15= Sum 1-15	Total	\$40,580,627	\$39,090,619	(\$1,406,464)	(3.67%)

(1) Attachment JAM-8 – Rate Design Model Settlement. J. Mancinelli. Rate Design – WP 28 Other Tables & Figures. Columns C-H. Lines 313-336. Page 236 of 236.

1

2 Although the October COSS separately identified current General Power and Municipal
3 General Power customer classes, CEL&P has proposed to consolidate these two groups
4 into a single GP customer class, as I described in my previously filed direct testimony.
5 The Settling Parties agree that CEL&P's original proposal to consolidate the current
6 General Power and Municipal General Power customer classes is appropriate. However,
7 the Settling Parties have agreed to divide the Original GP class into two groups. The first
8 group, a GP class, will be applicable to customers with maximum monthly demand less

1 than or equal to 10 KW. A second group, a GP-Large (“GPL”) class, will be applicable
2 to customers with maximum monthly demand greater than 10KW but less than 50 KW.
3 As shown in Table JAM-S1, except for the sum of the newly divided GP and GPL classes
4 compared to the Original GP class, in all cases class revenue requirements are lower under
5 the Settlement. The sum of the newly divided GP and GPL classes is higher because when
6 dividing the Original GP class into a small and a large component, customer load diversity
7 of the separated classes changed compared to the single aggregated class. AMI load data
8 indicated that there is less load diversity within each separate class compared to the
9 combined class, resulting in an increased allocation of demand and a higher cost of service.

10 **Q6. IS THE SETTLEMENT COSS REASONABLE?**

11 A. Yes, the Settling Parties agree that SCOSS results are reasonable and support the
12 settlement rate proposal. The Settlement terms reflect that the OUCC does not have an
13 objection to CEL&P’s SCOSS, the principles of which were the same as applied in the
14 October COSS. The SCOSS study only differs from the October COSS in that the Original
15 GP class was divided into GP and GPL classes, and the system revenue requirement was
16 lowered to the Settlement amount as described in Ms. Wilson’s settlement testimony. A
17 summary of the indicated percentage class revenue requirement adjustments determined
18 in the October COSS compared to the SCOSS is shown in Table JAM-S2 below. Note
19 that these percentages compare current CEL&P base rates excluding the Temporary Rate
20 Rider (“TRR”) which will be eliminated upon implementation of Phase 1 rates.

21

Table JAM-S2
Revised Percent Change from Current Rates Excluding the TRR to Cost of Service⁽¹⁾

Line No. (a)	Customer Class (b)	Current Rates Excluding TRR to COS(1) (%) (c)	Current Rates Excluding TRR to COS(2) (%) (d)	Difference (%) (e) = (d) - (c)
1	Residential Service	30.2%	23.4%	(6.8%)
2	General Power Service (Combined)	12.7%	14.5%	1.7%
3	Primary Power Service	14.1%	9.5%	(4.6%)
4	Municipal Street Lighting Service	33.3%	24.0%	(9.3%)
5	Outdoor Lighting Service	(38.5%)	(41.5%)	(3.1%)
6	Traffic Signal Service	(19.3%)	(23.8%)	(4.5%)
7 = Sum 1-6	Total	17.4%	13.7%	(3.7%)
8	(1) Attachment JAM-8 – Rate Design Model Settlement. J. Mancinelli. Rate Design – WP 28 Other Tables & Figures. Columns B-F. Lines 70-77. Page 227 of 236.			

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2 Overall, CEL&P system rate revenues will be 3.7% lower than CEL&P requested in
3 direct testimony. As previously mentioned, the division of the Original GP class into a
4 small and a large component increased the combined cost of service, or the sum of the GP
5 and GPL class revenue requirements, compared to the single class revenue requirement.

6 **Q7. WHY DID THE SETTLING PARTIES AGREE TO THE DIVISION OF THE**
7 **ORIGINAL GP CLASS INTO TWO CLASSES, GP AND GPL?**

8 A. The division of the GP class into a group of small commercial customers that have a
9 maximum monthly demand less than or equal to 10 KW (GP), and a group of large
10 commercial customers that have maximum monthly demand greater than 10 KW but less
11 than 50 KW (GPL), was based on the Settling Parties' agreement to not introduce a
12 demand charge to the smallest commercial customers. For small commercial customers
13 in the GP class, Settlement rates include only a customer charge and an energy charge.
14 However, for larger commercial customers in the GPL class, Settlement rates include a
15 customer charge, demand charge, and energy charge. Given the limitations of CEL&P's

1 current billing system, the easiest solution to accomplish this result was to limit the size
2 criteria of the current GP class and create a new GPL class.

3 **Q8. PLEASE DESCRIBE THE GP AND GPL CLASSES AS AGREED TO BY THE**
4 **SETTLING PARTIES.**

5 A. The following Table JAM-S3 summarizes the proposed division of the Original GP class.

Table JAM-S3
Proposed GP and GP-Large Customer Classes⁽¹⁾

Line No.	Item	GP 0-10KW	GP-Large >10KW to <50KW	Original GP <50KW
1	Customer- Months	14,445	3,830	18,275
2	Estimated KW Billed	44,387	136,354	180,741
3	Energy - KWH	9,714,364	35,462,496	45,176,860
4	Revenue under Current Rates and TRR	\$1,417,199	\$3,622,992	\$5,040,191
5	Billed Demand per Customer - KW	3	36	10
6	Energy per Customer - KWH	673	9,258	2,472
7	Current Revenue per Customer	\$98	\$946	\$276

8 (1) Attachment JAM-8 – Rate Design Model Settlement. J. Mancinelli. Rate Design – WP 28 Other Tables
& Figures. Columns B-F. Lines 52-64. Page 226 of 236.

6
7 As shown above, a GP class with a lower 10 KW limit captures approximately
8 79% (14,445 customer-months/18,275customer-months) of customers in the current
9 GP class. These customers represent a variety of small retail establishments such as gift
10 shops, beauty parlors and small offices and restaurants. As shown in the above table,
11 GPL customers are about 10 time larger than GP customers.

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IV. RESIDENTIAL RATE MITIGATION

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**Q9. WHAT IS THE SETTLING PARTIES' AGREEMENT WITH RESPECT TO
THE RECOVERY OF SCOSS RESULTS FROM THE VARIOUS RATE
CLASSES?**

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A. In CEL&P's original proposal, class specific rate increases were phased in over two-years. Residential rate increases were capped at 7% annually, a level well below rate increases indicated by the October COSS. In my direct testimony, the revenue shortfall due to residential rates below the October COSS were made up by commercial customers. Given a lower settlement system revenue requirement, the Settlement Parties agreed to lower the Residential rate cap to 6% annually, which is still well below rate increases indicated by the SCOSS. Again, commercial customers will make up the revenue shortfall; but in all cases, under the Settlement, the class revenue responsibility associated Phase 2 rates will be lower than originally proposed. This result is shown in Table JAM-S4 below.

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Table JAM-S4
Rate Phase-In Plan Comparison⁽¹⁾

(A)	(B)	(C)	(D)	(E)
Line No.	Class	Phase 1	Phase 2	Total
1	Residential Electric Service			
2	Settlement Agreement	6.00%	6.00%	12.36%
3	CEL&P Direct Testimony	7.00%	7.00%	14.49%
4	Difference (%)	(1.00%)	(1.00%)	(2.13%)
5	General Power Service (Combined)			
6	Settlement Agreement	4.76%	3.22%	8.13%
7	CEL&P Direct Testimony	4.21%	4.48%	8.88%
8	Difference (%)	0.55%	(1.26%)	(0.75%)
9	Primary Power			
10	Settlement Agreement	7.18%	7.86%	15.61%
11	CEL&P Direct Testimony	10.32%	10.26%	21.63%
12	Difference (%)	(3.14%)	(2.40%)	(6.02%)
13	Municipal Street Lighting Service			
14	Settlement Agreement	31.09%	0.00%	31.09%
15	CEL&P Direct Testimony	16.34%	16.22%	35.21%
16	Difference (%)	14.75%	(16.22%)	(4.12%)
17	Outdoor Lighting Service			
18	Settlement Agreement	0.00%	0.00%	0.00%
19	CEL&P Direct Testimony	0.90%	0.87%	1.79%
20	Difference (%)	(0.90%)	(0.87%)	(1.79%)
21	Traffic Signal Service			
22	Settlement Agreement	0.00%	0.00%	0.00%
23	CEL&P Direct Testimony	0.92%	0.84%	1.77%
24	Difference (%)	(0.92%)	(0.84%)	(1.77%)

25 (1) Attachment JAM-8 – Rate Design Model Settlement. J. Mancinelli. Rate Design – WP 28 Other
Tables & Figures. Columns C-G. Lines 243-273. Page 234 of 236.

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2 Additional changes impacting the settlement phase-in proposal are related to lighting
3 classes and the GPL class. Because the dollars associated with lighting class rate increases
4 are small, the Settlement adjusts lighting rates in one step rather than two. Also, two-step
5 increases associated with GPL customers are higher in Phase 1 compared to Phase 2, due
6 to the impact of the Temporary Rate Rider approved by the Commission in Cause No.

1 45429, which would have caused the GPL rates to decrease in Phase 1 if the percentage
2 increases by phase were applied in the same way as other classes. The Settling Parties
3 agreed that it did not send the correct price signals to decrease GPL rates in Phase 1, just
4 to increase rates in Phase 2, particularly when no other class was seeing a rate decrease in
5 the first phase. The GPL rate phase-in proposal results in a smooth transition from current
6 rates with the TRR to settlement rates.

7 **Q10. WHAT IS THE NET IMPACT OF THE PHASE 1 RATE PROPOSAL**
8 **COMPARED TO CURRENT RATES WITH THE TRR?**

9 A. The IURC approved a TRR for CEL&P with the understanding that upon completion of
10 the current rate case, revenues generated by the TRR would be absorbed into base rates
11 and the TRR would be eliminated. Therefore, as Phase 1 rates take effect, CEL&P
12 customers will experience a much lower initial rate increase compared to the total Phase
13 1 rate increases shown in Table JAM-S4. Because of the TRR, Phase 1 rates are
14 implemented in two parts. Customer have already experienced the first part of the rate
15 increase through the TRR and the second part represents the incremental adjustment
16 required to meet the total Phase 1 rate increase objective. These two parts are shown in
17 Table JAM-S5 below.

Table JAM-S5
Impact of TRR on Phase 1 Rate Increases⁽¹⁾

(A)	(B)	(C)	(D)	(E)
Line No.	Component	TRR	Phase 1 Incremental Increase	Total Phase 1 Increase
1	Residential Electric Service			
2	Residential	3.17%	2.74%	6.00%
3	Commercial <50KW			
4	General Power	2.67%	1.29%	4.00%
5	General Power Large	5.06%	0.00%	5.06%
6	Combined	4.37%	0.37%	4.76%
7	Commercial >=50KW			
8	Primary Power	2.06%	5.02%	7.18%
9	Lighting			
10	Municipal	0.00%	31.09%	31.09%
11	Outdoor	0.00%	0.00%	0.00%
12	Traffic	0.00%	0.00%	0.00%
13	Total	2.66%	3.88%	6.64%
14	(1) Attachment JAM-8 – Rate Design Model Settlement. J. Mancinelli. Rate Design – WP 28 Other Tables & Figures. Columns C-G. Lines 292-308. Page 235 of 236.			

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2 In the table above, Column D – Phase 1 Incremental Increase, represents the rate change
3 that the various customer classes will experience upon implementation of Phase 1 rates.
4 For residential customers, this change from what they are currently paying in bills that
5 include the TRR, on average will be only 2.74%. Given this phase-in plan, class revenues
6 and percentage increases agreed to by the Settling Parties are summarized in Table JAM-
7 S6.

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**Table JAM-S6
Proposed Rates on Current Revenues by Class Settlement⁽¹⁾**

Line No. (a)	Customer Class (b)	Current Total (\$) (c)	TRR Total (\$) (d)	Current to TRR Change (%) (e) = (d)/(c)-1	Phase 1 Total (\$) (f)	Phase 1 Cumulative Change (%) (g) = (f)/(c)-1	TRR to Phase 1 Change (%) (h) = (f)/(d)-1	Phase 2 Total (\$) (i)	Phase 2 Cumulative Change (%) (j) = (i)/(c)-1	Phase 1 to Phase 2 (%) (k) = (i)/(d)-1
1	Residential Service	\$9,107,375	\$9,396,271	3.2%	\$9,653,846	6.0%	2.7%	\$10,233,076	12.4%	6.0%
2	General Power (Combined)	4,828,965	5,040,191	4.4%	5,058,615	4.8%	0.4%	5,221,423	8.1%	3.2%
3	Primary Power Service	20,077,273	20,490,081	2.1%	21,519,687	7.2%	5.0%	23,210,559	15.6%	7.9%
4	Municipal Street Lighting Service	207,972	207,972	0.0%	272,630	31.1%	31.1%	272,630	31.1%	0.0%
5	Outdoor Lighting Service	131,509	131,509	0.0%	131,509	0.0%	0.0%	131,509	0.0%	0.0%
6	Traffic Signal Service	19,135	19,135	0.0%	19,135	0.0%	0.0%	19,135	0.0%	0.0%
7 = SUM 1-6	Total	\$34,372,230	\$35,285,160	2.7%	\$36,655,423	6.6%	3.9%	\$39,088,333	13.7%	6.6%

8 (1) Attachment JAM-8 – Rate Design Model Settlement. J. Mancinelli. Rate Design – WP 28 Other Tables & Figures. Columns B-M. Lines 82-90. Page 227 of 236.

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1 **V. RATE DESIGN**

2 **Q11. DOES THE SETTLEMENT AGREEMENT INCLUDE ANY MATERIAL**
3 **CHANGES TO RATE DESIGN?**

4 A. Yes, with respect to the GP and GPL classes previously described in my testimony.

5 **Q12. PLEASE DESCRIBE RATE DESIGN CHANGES TO THE NEWLY DEFINED**
6 **GP CLASS?**

7 A. Under the settlement proposal, GP customers will have a customer charge and an energy
8 charge, but not the demand charge or demand ratchet that were originally proposed. The
9 customer charge will vary depending upon single or three phase service. A customer
10 charge of \$30 per month for single phase service and \$60 per month for three phase service
11 will remain at current levels. The minimum bill for these customers will be the customer
12 charge. This rate structure is identical to the current GP and MGP rate structures.

13 **Q13. IS CEL&P PROPOSING ANY CHANGES TO THE NEW GP-LARGE RATE**
14 **STRUCTURE?**

15 A. Yes, CEL&P originally proposed a demand charge and a 50% demand ratchet provision
16 applicable to all customer classes with a demand charge. The Settling Parties agreed to
17 retain a demand charge for the new GP-Large class, but at a lower level than what CEL&P
18 had originally proposed. The proposed Phase 2 demand charge for GPL customers is \$6.50
19 per kW-month compared to \$14.72 per kW-month in the original proposal. Additionally,
20 CEL&P agreed the 50% demand ratchet would not apply to GPL customers. Customers
21 in this class will be subject to customer, demand, and energy charges. Customer charges
22 for this class will be \$45 per month for single phase service and \$90 per month for three
23 phase service. The minimum bill for these customers will be the customer charge.

1 **Q14. ARE YOU SPONSORING THE TARIFF AND REVENUE PROOF FOR**
2 **WHICH COMMISSION APPROVAL IS SOUGHT?**

3 A. Yes, included with my Settlement Testimony is Attachment JAM-9 providing the revised
4 tariff reflecting the Settlement Agreement and Attachment JAM-8 providing the
5 settlement rate design model and revenue proof.

6 **VI. RATE COMPARISONS**

7 **Q15. HOW DO CEL&P'S SETTLEMENT RATES COMPARE WITH**
8 **SURROUNDING UTILITIES?**

9 A. Monthly bills under CEL&P settlement rates compared to other neighboring utilities are
10 shown in Table JAM-S7 below.

Table JAM-S7
Comparison of Monthly Electric Bills⁽¹⁾

Consumption	CEL&P Current	CEL&P Phase 2 (Est. 2023)	Tipmont REMC Current (2020)	Parke County REMC (2020)	Duke Energy IURC Cause 45253⁽²⁾	CEL&P Phase 2 Compared to Tipmont	CEL&P Phase 2 Compared to Parke County	CEL&P Phase 2 Compared to Duke
Residential Bills								
500 kWh	\$60.16	\$66.59	\$88.61	\$88.77	\$74.62	(25%)	(25%)	(11%)
1,000 kWh	\$105.32	\$118.17	\$142.72	\$145.53	\$126.55	(17%)	(19%)	(7%)
1,500 kWh	\$150.48	\$169.76	\$196.83	\$202.30	\$173.41	(14%)	(16%)	(2%)
2,000 kWh	\$195.64	\$221.35	\$250.94	\$259.06	\$220.26	(12%)	(15%)	0%
Small Commercial/General Service								
3,000 kWh	\$340.92	\$367.79	\$404.66	\$436.19	\$365.10	(9%)	(16%)	1%
7,500 kWh	\$762.31	\$800.03	\$891.64	\$917.83	\$792.10	(10%)	(13%)	1%
15,000 kWh	\$2,025.88	\$2,350.28	\$1,785.64	\$1,760.67	\$1,503.76	32%	33%	56%
30,000 kWh	\$3,751.75	\$4,400.55	\$3,461.28	\$3,446.34	\$3,565.76	27%	28%	23%
Large Commercial/Industrial								
150 kW 60,000 kWh	\$5,737.37	\$6,672.19	\$5,988.14	\$6,660.07	\$5,989.19	11%	0%	11%
300 kW 120,000 kWh	\$11,174.75	\$13,044.39	\$11,866.28	\$13,235.15	\$11,953.85	10%	(1%)	9%
1,000 kW 400,000 kWh	\$36,549.16	\$42,781.28	\$40,728.85	\$43,918.82	\$34,453.91	5%	(3%)	24%
5,000 kW 2,500,000 kWh	\$195,670.78	\$226,715.92	\$230,416.55	\$250,296.38	\$207,759.07	(2%)	(9%)	9%

(1) Attachment JAM-11 – Rate Comparison Settlement. J. Mancinelli. Rate Comparisons – Summary. Columns L-U. Lines 1-18. Page 1 of 29.

(2) July 27, 2020 Petitioner's Compliance Filing of Final Version of Retail Electric Tariff, Cause No. 45253.

1 CEL&P Phase 2 Residential and small commercial rates (GP and GPL) are very
2 competitive compared to neighboring utilities. The competitiveness of large commercial
3 loads vary depending upon the size of the load and the customers usage characteristics.

4 **VII. CONCLUSION**

5 **Q16. WHAT ARE YOUR RECOMMENDATIONS?**

6 A. I recommend that the Settlement be accepted and approved by the Commission. The
7 parties involved in the settlement process worked very hard to agree on an outcome that
8 represented the best possible result for each customer class and CEL&P.

9 **Q17. DOES THIS CONCLUDE YOUR TESTIMONY?**

10 A. Yes.

VERIFICATION

I affirm under the penalties of perjury that the foregoing Pre-filed Settlement Testimony is true to the best of my knowledge, information, and belief as of the date here filed.



Joseph A. Mancinelli

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