## Public Counsel Data Request No. 77:

What is the rationale for allocating nearly all elements of customer assistance expense on the basis of system coincident peak, as shown on DLT-4, Tab 5, Page 18?

## **Response to Public Counsel Data Request No. 77:**

The company determined that using a single customer factor to allocate all components of Account 908 was insufficient. A customer factor is now used to allocate only the small portion of this account (DLT-4, Tab 5, Page 18, Line 1) identified as strictly customer related. The majority component of Account 908 (DLT-4, Tab5, Page 18, lines 3-45) represents expenses associated with demand-side programs. As such, the use of a factor comprised of 50% demand, 50% energy is a more suitable allocation basis.

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