Date Filed: September 03, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) Please refer to Exhibit CLP-RATES-1, at 34, lines 5-7: "For an average customer without a heat pump, average usage across the year is approximately 700 kWh per month, with some degree of seasonal variability." For customers without a heat pump, what is the average monthly usage of the median customer for each month of the year?

Response:

At this time, the Company is unable to differentiate which Rate 1 customers have or do not have heat pumps, and determine the average monthly usage of median Rate 1 customers as requested. For a Rate 1 customer with an average usage across the year of 700 kWh, the average monthly usage would be as follows:

Month	Average Usage (kWh)
January	779
February	695
March	638
April	598
May	538
June	660
July	908
August	956
September	781
October	574
November	570
December	704
Annual Average	**700**