

**In The Matter of the Provision of Basic Generation Service for  
The Period Beginning June 1, 2010  
Docket No. ER09050351**

ROCKLAND ELECTRIC COMPANY

RESPONSE TO RATE COUNSEL'S DISCOVERY REQUESTS

DATA REQUEST RCR-4:

Please provide utility-specific customer switching data for BGS-CIEP and BGS-FP customers, showing the number of customers taking service under BGS-CIEP and BGS-FP and third-party suppliers, by month, for the twelve month period ending June 2009.

ANSWER:

Below is the requested information.

	<u>BGS-CIEP</u>	<u>BGS-FP</u>	<u>TPS</u>
Jul-08	9	72205	35
Aug-08	9	72205	35
Sep-08	9	72246	37
Oct-08	9	72262	44
Nov-08	9	72272	44
Dec-08	9	72336	53
Jan-09	10	72337	56
Feb-09	9	72299	62
Mar-09	9	72322	71
Apr-09	9	72302	86
May-09	9	72233	104
Jun-09	9	72163	133

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DATA REQUEST RCR-5:

Please provide, for each EDC:

- a. The total number of BGS-CIEP and BGS-FP customers/accounts, the amount of load being served by each EDC, and the amount of each EDC's load served by a Third Party Supplier ("TPS").
- b. The number of customers/accounts with a peak load share at or above 1250 kW that have switched to a TPS and the MW of load switched to a TPS for the twelve month period ending June 2009.
- c. The number of customers/accounts with a peak load share between 1250 kW and 1000 kW that have switched to a TPS and the MW of load switched to a TPS for the twelve month period ending June 2009.

ANSWER:

- a. For RECO, the total number of BGS-CIEP and BGS-FP customers/accounts is 11 and 72,164, respectively, as of June 30, 2009. For comparison, the total number of customers/accounts eligible for BGS-CIEP and BGS-FP service is 22 and 72,268, respectively. RECO's BGS-CIEP and BGS-FP loads are 12.3 MW and 426.5 MW, respectively. RECO's customer loads served by a TPS for BGS-CIEP and BGS-FP are 26.1 MW and 18.1 MW, respectively.
- b. For the 12-month period ending June 2009, one customer at or above 1,250 kW demand has switched to a TPS with an approximate load of 3.8 MW.
- c. For the 12-month period ending June 2009, one customer between the 1,000 and 1,250 kW demand switched to a TPS with an approximate load of 1.0 MW.

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DATA REQUEST RCR-6:

For each EDC, please provide the number of BGS-FP customers that have switched to a TPS and the number returning to BGS-FP service for the twelve month period ending June 2009.

ANSWER:

Below is the requested information.

	<u>Enrollments to TPS Service</u>	<u>Returns to BGS-FP Service</u>
Jul-08	5	0
Aug-08	0	0
Sep-08	2	0
Oct-08	7	0
Nov-08	0	0
Dec-08	9	0
Jan-09	5	0
Feb-09	5	0
Mar-09	10	0
Apr-09	16	1
May-09	18	0
Jun-09	29	0