

UAE Exhibit 2.1R
Docket No. 19-057-02

DPU Response to Data Request UAE 1.01

UAE Data Request to DPU

1.01 Please refer to the Phase II Direct Testimony of Howard E. Lubow, page 7, lines 180-181, which states, "Utilities often propose a 50% / 50% assignment where such a factor is employed."

- a. Please cite to each utility that Mr. Lubow is aware of that has proposed a 50% / 50% design day / throughput weighting allocation method. Please provide the applicable jurisdiction and docket number corresponding to each citation.
- b. Please cite to each utility that Mr. Lubow is aware of that currently utilizes a 50% / 50% design day / throughput weighting allocation method. For each citation, please provide the jurisdiction and docket number in which the 50% / 50% design day / throughput weighting was approved.

1.02 With respect to the above requests, please provide your workpapers and source data for the responses. Please provide source data in electronic format with all formulae and input sources intact.

Response to UAE Data Request to DPU 1.01

Mr. Lubow does not maintain a log of the practices employed by utilities in rate filings. His testimony is based upon his participation approximately 200 rate electric and gas rate proceedings over the period of his career. As Mr. Lubow points out in his testimony at page 7, "this type of factor is ultimately somewhat subjective as to how to weight peak and annual usage...the goal here is to recognize the diversity in the use of the system among various customer groups." As addressed, the use of a design day peak factor instead of actual peak usage further supports a 50% / 50% allocation.