



James A. Lahtinen
Vice President – Rates and Regulatory Economics

April 14, 2005

VIA HAND DELIVERY

Hon. Jaclyn A. Brillling
Secretary
State of New York Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case 00-M-0504 – Proceeding on Motion of the Commission Regarding Provider of Last Resort Responsibilities, the Role of Utilities in Competitive Energy Markets and Fostering Development of Retail Competitive Opportunities

Dear Secretary Brillling:

On August 25, 2004, the New York State Public Service Commission (“PSC” or the “Commission”) issued a Statement of Policy on Further Steps Toward Competition in Retail Energy Markets (“Policy Statement”), which ordered regulated utilities in New York to file retail access plans with the Commission. Pursuant to that Policy Statement, we are filing an original and five copies of the retail access plans for New York State Electric & Gas Corporation (“NYSEG”) and Rochester Gas and Electric Corporation (“RG&E”) detailing the Companies’ retail access plans for electric and natural gas customers.

The electric retail access plans are the *Voice Your Choice* programs for electricity customers. NYSEG’s *Voice Your Choice* program was approved by the PSC on February 27, 2002 and implemented on January 1, 2003. The Company is requesting approval, by September 30, 2005, to continue the NYSEG *Voice Your Choice* program with new two-year commodity-offering programs beginning January 1, 2007. The Company will implement the same program except for the addition of a purchase of receivables program for energy services companies (ESCOs). RG&E’s *Voice Your Choice* program was approved by the PSC on May 20, 2004, implemented on January 1, 2005 and will continue, in accordance with the Commission Order, through December 31, 2008.

Our *Voice Your Choice* programs are the most comprehensive retail access programs in the State with over 425,000 customers actively making a choice. The programs also facilitate an appropriate environment and opportunity for customer migration to alternative suppliers. During the most recent *Voice Your Choice* programs, 30% of NYSEG’s customers made an active choice - a 70% increase from the 2002 enrollment period - and over 50% of RG&E’s customers made an active choice. The number of customers served by ESCOs increased 171% at NYSEG and 61% at RG&E.¹

¹ For NYSEG this figure is based on *Voice Your Choice* data collected between September 2002 and March 31, 2005.

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Office of Retail Market Development
Director

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Chairman William Flynn recently noted this success in increased migration, stating:

“In fact, more than 20% of RG&E’s electric customers, or about 72,000 are now purchasing their electricity from an ESCO, which is the second highest penetration rate of any utility service territory in the State.”²

It is important to note that the migration successes in the *Voice Your Choice* programs have been achieved by encouraging customers to make fully informed choices.

The *Voice Your Choice* programs clearly operate to achieve the PSC’s goals of furthering customer choice and encouraging competition by:

- Providing a full menu of electricity supply choices from NYSEG, RG&E and nearly 20 unregulated ESCOs.
- Providing a visible and transparent competitive benchmark – NYSEG’s Bundled Rate Option and RG&E’s Fixed Price Option – against which ESCOs can compete. (NYSEG’s and RG&E’s fixed prices are developed using competitive market prices and were posted on the respective Company’s web sites on the first day of the *Voice Your Choice* programs in order to provide customers a clear price signal and ESCOs a benchmark price.)
- Facilitating the opportunity for participation and switching through an outreach and education program developed in conjunction with the PSC’s Office of Retail Market Development. This program includes more than 260 community presentations, sustained paid advertising across the full spectrum of media, mailings to all customers of enrollment kits and reminders, and an outbound calling program during the enrollment period to encourage customers who had not yet acted to make a choice from the full menu of electricity supply options.

It is important to point out that over 75%, or nearly eight out of ten, customers at both NYSEG and RG&E chose the fixed price option from their utility. Our customers expect and deserve the opportunity to choose price certainty from their utility.

This fact was also supported by an independent study conducted by the Edison Electric Institute (EEI) in March 2005. The EEI survey of NYSEG and RG&E customers concluded that nine out of ten customers want their utility to remain an option in a customer choice program, and that almost 70% of customers prefer a fixed price option. A press release summarizing the survey is included as Attachment A to the respective plans.

² Speech by Chairman William Flynn, New York State Public Service Commission, before the Rochester Electrical Association, March 30, 2005.

Hon. Jaclyn A. Brillling
April 14, 2005

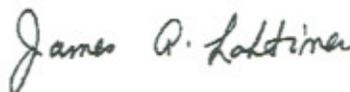
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We acknowledge Mr. Ronald Cerniglia, Director, Office of Retail Market Development, and his staff for their efforts working hand-in-hand with the Companies to make the *Voice Your Choice* programs a resounding success. He and his staff were actively involved, conducting a series of regional public forums in the Rochester area during the *Voice Your Choice* enrollment period. The Companies also appreciate Chairman Flynn's endorsement of the program by recently describing it as a "tremendously successful initiative".³

The successful *Voice Your Choice* programs, implemented in conjunction with the Office of Retail Market Development, meet the Commission's goals set forth in the Policy Statement by helping to establish an effective market framework, eliminating barriers to competition, attracting new market entrants, increasing customer awareness of choice and facilitating migration, and they demonstrate our Companies' commitment to the continuing development of retail markets.

We look forward to working with the Office of Retail Market Development in continuing these successful retail access plans, which serve our customers very well.

Respectfully submitted,



James A. Lahtinen

³ Speech by Chairman William Flynn, New York State Public Service Commission, before the Rochester Electrical Association, March 30, 2005.

ROCHESTER GAS AND ELECTRIC CORPORATION

Case 00-M-0504 – Proceeding on Motion of the Commission Regarding Provider of Last Resort Responsibilities, the Role of Utilities in Competitive Energy Markets and Fostering the Development of Retail Competitive Opportunities

RETAIL ACCESS PLAN

Introduction

Rochester Gas and Electric Corporation ("RG&E" or the "Company") is submitting details of its Retail Access Plan, including its *Voice Your Choice* ("VYC") program, pursuant to the New York State Public Service Commission's Statement of Policy on Further Steps Toward Competition in Retail Energy Markets ("Statement of Policy") that requires utilities to submit Retail Access Plans.¹

The Company's VYC program is a comprehensive retail access program, which promotes the PSC's goals set forth in the Statement of Policy. This program, implemented as a result of the Electric² and Gas³ Rate Joint Proposals (collectively known as the "Rate Joint Proposals") approved by the Commission, meets the goals set forth in the Statement of Policy. RG&E's VYC program was approved by the PSC on May 20, 2004; implemented on January 1, 2005; and will continue per the approved Rate Joint Proposals through December 31, 2008.

RG&E has implemented the most comprehensive electric customer choice program in New York State: VYC. The success of this program is demonstrated by the fact that more than 50% of RG&E's electric customers expressed their preference for a commodity supplier and commodity price option. Of those, 77% chose the price certainty of a fixed price option. In addition, an independent study was conducted by the Edison Electric Institute ("EEI") in March 2005. The EEI survey of New York State Electric &

¹ Case 00-M-0504, Proceeding on Motion of the Commission Regarding Provider of Last Resort Responsibilities, the Role of Utilities in Competitive Energy Markets and Fostering Development of Retail Competitive Opportunities, Statement Of Policy On Further Steps Toward Competition in Retail Energy Markets (issued August 25, 2004).

² Cases 03-E-0765 et al., Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Rochester Gas and Electric Corporation for Electric Service, "Electric Rate Joint Proposal" (dated March 9, 2004) ("Electric Rate Joint Proposal"), as approved by the Commission in its Order Adopting Provisions of Joint Proposals with Conditions (issued May 20, 2004) ("RG&E Rate Order").

³ Cases 03-G-0766 et al., Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Rochester Gas and Electric Corporation for Gas Service, "Gas Rate Joint Proposal" (dated March 9, 2004) ("Gas Rate Joint Proposal"), as approved by the Commission in its RG&E Rate Order.

Gas Corporation ("NYSEG") and RG&E customers concluded that 9 out of 10 customers want their utility to remain an option in a customer choice program and almost 70% of customers prefer a fixed price option. Attachment A contains a press release summarizing the EEI survey.

More than 27,000 customers chose to receive their electricity supply from an energy services companies ("ESCOs"); this 61% increase in customer migration continues to rise. RG&E has a total electric migration of 20%, which has been achieved by promoting fully informed customer choice.

Given the resounding success of the VYC retail access program, the Company will continue to implement this program in accordance with the RG&E Rate Order. This filing details the elements of the VYC program design, implementation, and schedule, as well as other important retail access initiatives.

Retail Access Initiatives

A summary of the Company's retail access initiatives is as follows:

Electric

- Initiated a comprehensive customer choice (VYC) program on October 1, 2004. Under this program, customers chose among a variety of electric commodity pricing options offered by both the Company and ESCOs effective January 1, 2005.
- Implemented an interval meter option for ESCOs' electric customers effective January 1, 2005.
- Employed an electric Market Based Backout Credit in November 2003 using multiple load shape profiles for individual service classifications, as requested by ESCOs.

Gas

- Modified the tier structure and associated cash-out charges in November 2004 for gas retail access, which enabled ESCOs to see their bills and billing details online and manage their costs more effectively.
- Implemented daily automatic imbalance trading for gas retail access in November 2004, which has dramatically reduced the trading requirements for ESCOs.
- Implemented SmarTRAC for gas service in November 2004, which provides an interactive, secure web site for ESCO use. This feature has been so successful that other utilities may also implement it.
- Modified the Gas Capacity Assignment Program in September 2004, allowing partial voluntary participation. Full voluntary participation is awaiting a state-wide solution of a mechanism for RG&E to access an ESCO's capacity in the event an ESCO defaults or exits the local market.

- Implemented a Merchant Function Charge ("MFC") in May 2004, which reflects RG&E's administrative costs of obtaining natural gas. Customers who are with an ESCO are not charged the MFC.

Both Electric & Gas

- Implemented a Purchase of Receivables ("POR") program for gas and electric service without recourse effective January 1, 2005.
- Transitioned from a Single- to the Multi-Retailer Retail Access Model in March 2003 for both gas and electric service.⁴
- Implemented Electronic Data Interchange ("EDI") transactions⁵ in March 2003 to transfer billing and consumption data between ESCOs and the regulated utilities in a structured electronic format that adheres to industry standards. EDI testing is scheduled quarterly, with ESCO participation at every session. Many sessions are fully subscribed; at least one entity (Energy Co-Op of New York [ECNY]) is testing as a renewable ESCO. Further supporting EDI, every direct customer is EDI compliant.
- Provided a utility-consolidated billing option to ESCOs who serve gas and/or electric customers as of March 2003. Under this option, customers receive a bill processing credit of \$0.62 per month. Nine ESCOs are currently taking advantage of this service.
- Hosted ESCO orientations relating to the first commodity enrollment period.
- Sponsored Market Match and Market Expo programs, which increased customer exposure to competitive commodity suppliers.
- Provided an ESCO web site, <http://www.rge.com/rgeweb/webcontent.nsf/esco/ESCO>, containing information ranging from eligibility criteria, forms and agreements, load profiles, ISO maps, daily MBBC prices, and degree day information to comprehensive Supplier Manuals for both gas and electric ESCOs.
- Conducted meetings with ESCOs as a group at least quarterly and with each individual ESCO at least once a year.
- Performed annual surveys, which measured ESCO satisfaction and customer awareness of retail choice.
- Established an ESCO liaison at RG&E to ensure seamless communication and strengthen working relationships with ESCOs.
- Established a formal dispute resolution process to address ESCO concerns.

⁴ Cases 02-E-0198 and 02-G-0199, Proceedings on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Rochester Gas and Electric Corporation for Electric and Gas Service, Order Adopting Recommended Decision with Modifications (issued March 7, 2003)

⁵ Case 98-M-0667, In the Matter of Electronic Data Interchange, Order Approving Electronic Data Interchange Transactions for Utility Bill Ready and Rate Ready Billing (issued June 21, 2002) and Notice of Correction (issued March 13, 2003), as the same may be amended, supplemented, clarified, revised or superseded from time to time.

RG&E's VYC Program

RG&E's VYC program allows customers to choose among a variety of electric commodity options offered by both the ESCOs and the Company. Introduced on October 1, 2004, thirteen ESCOs⁶ participated in this program during the first enrollment period.

The Statement of Policy states, "We also conclude that utility outreach programs on competition issues should involve coordination with interested ESCOs including collaborative meetings of interested parties to design outreach campaigns. Those campaigns should recognize the need for repeated consumer exposure to allow the advertising message to be internalized...NYSEG's and RG&E's Voice Your Choice... [is an] example of a targeted outreach campaign aimed at getting a coordinated message from the utilities and ESCOs regarding customers' ability to choose during a focused time period" (Statement of Policy at pp. 46-47, including footnote 69).

This campaign, the most comprehensive one in New York State, was based on an aggressive Customer Outreach and Education ("O&E") Plan developed and implemented by RG&E in collaboration with Staff and interested parties prior to the first VYC Open Enrollment Period. Designed to explain retail choice and the components of the competitive market initiatives, the Plan was an intensive, integrated mail, web, print, television, radio, public meetings, and an outbound dialing campaign. The outreach materials produced were fair, unbiased, accurate, and thorough. The Plan stressed the importance of educating customers on the menu of choices available to ensure a fully informed choice for their electricity supply.

Examples of these O&E activities include:

- More than 341,000 enrollment kits mailed to residential, commercial, and industrial customers.
- Three reminder notices, for a total of more than 728,120 notices, mailed to residential, commercial, and industrial customers not yet enrolled, in late November, early December, and mid-December.
- Receipt of over 68,680 calls using the special VYC information and enrollment telephone line (1-800-RGE VYCNOW).
- Receipt of over 252,000 hits on the VYC section of RG&E's web site, which provided links to ESCO web sites, answered Frequently Asked Questions (FAQs), and detailed RG&E rate information (including variable rate details which could not be provided in the enrollment kits).
- Specially trained personnel making approximately 260 presentations to churches, senior centers, neighborhood associations, health fairs, community groups, labor unions, town meetings, energy fairs, business, and government organizations reaching over 12,000 key constituents and customer representatives.

⁶ Participating ESCOs include: Advantage Energy, Agway Energy, Amerada Hess, Con Ed Solutions, Constellation, ECONergy, Energetix, Energy Co-Op of New York, Liberty Power, NYSEG Solutions, Select Energy New York, Sempra and US Energy Partners.

- Energy forums and fairs conducted in conjunction with PSC Office of Retail Market Development ("ORMD") staff with over 1,000 attendees, including extensive Question and Answer sessions. Most commonly asked questions included:
 - *Why aren't the ESCOs here?*
 - *Where can I see a comparison of ESCO prices?*
 - *What will happen to my NYPA Power Allocation?*
 - *How frequently can I switch?*
 - *Can you explain the transition charge?*
 - *How will this impact my budget/balanced bill?*
 - *Will I get one bill or two?*

The Market Match and Market Expo programs were enhanced under VYC, to increase customer exposure to and participation with competitive commodity suppliers. As of January 2005, the Company's Market Match program included 397 participating customer accounts, representing 102 companies. Further, as a result of our Market Expo, 67% of those attending chose to participate in retail access.

Enrollment Statistics

Of 171,787 enrollments received through December 31, 2004:

- 77% chose the RG&E Fixed Price Option
- 19% chose the RG&E Variable Price Option
- 1% chose the ESCO Price Option
- 3% chose the ESCO Option with Supply Adjustment

These figures understate the number and percent of customers choosing an ESCO. As described below, this understatement results from the ESCOs enrolling new customers after December 31, 2004. As of March 31, 2005, the number of customers being served by ESCOs has increased to over 72,000.

A comprehensive final report on VYC results entitled the RG&E Voice Your Choice Program Report First Enrollment Period is being transmitted under separate cover to the ORMD, and is also attached.

Customer Choices

As shown in Attachments B and C, the Company's recent customer choice initiatives – the electric VYC program supported by the POR program – have been extremely successful.

More than 50% of the customers responded to the VYC call to action and made an active choice of electric commodity -- a tremendous participation rate in RG&E's service territory for the first year of the VYC program. It is important to note that the O&E campaign discussed above, and specifically cited in the Statement of Policy, focuses on making an informed choice – it encourages customer choice. This O&E program was

developed and implemented in conjunction with the PSC's ORMD in 2004. Clearly, our customers feel strongly about their right to choose, and will exercise that right when given an informed opportunity.

Table 1 of Attachment B makes it clear that, of those customers who made a choice, 77% chose the Fixed Price Option from RG&E. This statistic argues strongly that the Rochester area mass market continues to prefer the option that provides price certainty. This certainty is particularly important for our low income customers, who represent 28% of the mass market and a growing number of fixed income customers.

The VYC program was successful among all customer classes, with slightly over half of all residential and small non-residential customers making a choice. Additionally, all eligible large non-residential customers made an electric energy supply choice.

Although most customers made their choice by returning a postcard attached to their enrollment kit or by calling the Customer Response Center, a significant number of customers enrolled through RG&E's web site or via the automated voice response system. These newer technologies have proven to be cost-effective and efficient methods for reaching a large number of customers.

Customer Migration

As a result of the VYC and POR programs, four new electric ESCOs entered the RG&E market, resulting in a total of 21 approved electric ESCOs/direct customers. Of the ESCOs, 13 are currently serving electric customers. ESCOs are now serving 46% of RG&E's total electric system load, which represents 20% of the eligible electric customer base.

RG&E has experienced a 61% increase in retail access participation, as of March 31, 2005, which is higher than the estimates provided to Staff on January 19, 2005. This higher level is due in large part to the various business strategies adopted by some ESCOs that elected to hold enrollments until their customers' first meter read of 2005 demonstrated in Attachment C-Table 1. Continued growth is expected as four new electric ESCOs are currently in various stages of the qualification process, further exemplifying the success of the voluntary migration programs.

Although VYC is an electric program, from September 2004 to date, RG&E experienced an 8% increase in gas retail access participation, (Attachment C- Table 2). Of the 17 approved gas ESCOs/direct customers, all but two are currently serving customers.

POR Program

The POR program allows RG&E to purchase ESCO accounts receivable (including all their arrears as of the date of commencement of the program) without recourse. RG&E collaborated with Staff and interested parties to reach agreement on the

substance of this program. Details were formalized in a Joint Proposal dated August 20, 2004,⁷ which the Commission subsequently approved on December 27, 2004.

Again, the Commission "strongly encourage[d] utilities to consider implementing purchase of ESCOs' accounts receivable without recourse under utility consolidated billing programs, discounted as appropriate" in the Statement of Policy (p. 29).

RG&E's POR program became effective on January 1, 2005. At that time, the Company also purchased existing arrearages of all participating ESCOs⁸.

Real Time Pricing

On January 1, 2005, RG&E implemented an interval meter option for ESCOs' customers, which parallels the options offered customers taking service under RG&E's Service Classification 8 (Real Time Pricing Option). This program allows the use of interval meter data for energy scheduling and balancing, as well as for reporting an ESCO's capacity obligations. Eligibility for using interval meter data for scheduling and balancing purposes is the same whether: (i) the customer takes full-service or standby delivery service from RG&E or (ii) the customer purchases commodity service from a competitive supplier.

This interval metering alternative is consistent with the Commission's encouragement (at pages 30-31 of the Statement of Policy) of advanced metering and time-of-use pricing arrangements.

Enhancements to the 2004 VYC O&E Program

Building on the success of the recent VYC campaign, RG&E plans to enhance its VYC campaign in future years. Specifically in 2005, the Company will implement four particular program improvements.

First, RG&E will modify enrollment kits and O&E materials by:

- Simplifying the messages in the kits to highlight the two choices the customer may make between suppliers (ESCO or RG&E) and between rate options (fixed vs. variable).
- Further explaining the transition charge and post-enrollment switching options in enrollment kits and confirmation letters.

⁷ Cases 03-E-0765 *et al.*, *supra*, "Joint Proposal on Purchase of Accounts Receivable" (dated August 20, 2004) ("POR Joint Proposal"), as approved by the Commission in its Order Adopting the Terms and Conditions of the Joint Proposal for the Purchase of Accounts Receivable and Approving Related Tariff Amendments (issued December 27, 2004). See also, Electric Rate Joint Proposal, Section IX, paragraph 4, and Gas Rate Joint Proposal, Section IX, paragraph 2.

⁸ As of March 28, 2005, nine ESCOs are participating in the POR program: Energetix, Mirabito Fuel, Agway Energy Services, North American Energy, Energy Cooperative of NY, NYSEG Solutions, Econergy Energy, Con Ed Solutions, Pro Energy Marketing. RG&E has paid approximately \$39.5 million for those purchased gas and electric receivables to date.

- Incorporating information about budget/balanced billing to minimize customer concerns that its selected option choice could impact its existing budget arrangements.
- Enhancing materials for all levels of literacy.
- Conducting internal and external focus groups to obtain feedback on the revised kits.

Second, the Company will strengthen the web site and integrated voice response system to facilitate the enrollment process and to support higher volumes of traffic during the peak enrollment period.

Third, RG&E will encourage ESCOs to work with the PSC to support the PSC web site comparing ESCO options. Pricing needs to be clearly visible and transparent for customers to make an educated choice. Page 46 of the Statement of Policy also encourages support for this effort.

Finally, RG&E recommends that certain Staff-sponsored activities (i.e., town meetings, energy fairs) commence earlier in the enrollment cycle to increase customer awareness through these efforts.

In conclusion, the initiatives described above represent the kind of comprehensive plan envisioned in the Statement of Policy. The Company will continue to build on the successes achieved with its VYC program, and regularly assess its plan to ensure customer choice and competition.



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POLL: MOST NYSEG, RG&E CUSTOMERS WANT CURRENT UTILITY IN MENU OF OPTIONS FOR CHOICE

WASHINGTON (April 13, 2005) — As New York State regulators weigh new competitive models for the state's deregulated electricity markets, nine out of ten

NYSEG and RG&E customers say they want the option of continuing to receive electricity supply from their current utilities, according to a new poll.

The new survey released by Edison Electric Institute, a trade association representing the nation's investor-owned electric utilities, measured public opinion regarding electricity deregulation issues of customers served by New York State Electric and Gas Co. (NYSEG) and Rochester Gas & Electric Co. (RG&E).

The poll comes at a time when the state's Public Service Commission is exploring alternative competition models that could compel current NYSEG and RG&E customers to receive their electricity supply from energy services companies (ESCOs)—even though they may prefer to remain with their current providers. Both NYSEG and RG&E are active participants in the electricity supply business.

Significantly, the EEI poll revealed that the NYSEG and RG&E customers surveyed overwhelmingly said their current utilities should be allowed to supply electric power to them: 91 percent of NYSEG customers and 89 percent of RG&E customers voiced this opinion. The survey also disclosed that nearly two-thirds, or 65 percent, of customers said they favor deregulation of the state's electric utility markets.

"Our survey results clearly confirm that NYSEG and RG&E customers favor retail electric choice, or being allowed to choose their electricity supplier—one of the primary aims of state regulators now examining alternative retail models," said Bill Brier, EEI's vice president, policy and public affairs. "However, our poll convincingly reveals that these same customers clearly want their utilities to be on the menu of choices, and that they don't want any companies excluded."

Brier also observed that both NYSEG and RG&E have already implemented a vigorous customer choice program, "Voice Your Choice," which has enabled more than one million customers to choose from a menu of electricity supply options offered by

their current utility or by ESCOs. In 2004, more than 255,000 NYSEG customers chose an electricity supplier, while more than half of RG&E's customers made a conscious choice of electricity suppliers.

"Again, these results are proof positive that customers in upstate New York are well educated about competition and more than willing to proactively choose a supplier," Brier concluded. "The bottom line is that the current utility should be one of the options."

Market Strategies, Inc., a well-respected national market research firm, conducted the telephone poll March 28-30. Four hundred interviews were conducted among residential customers of NYSEG and RG&E; the margin of error for the survey is +/- 4.9 percentage points at the 95 percent confidence level.

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Edison Electric Institute (EEI) is the association of United States investor-owned electric utilities and industry affiliates and associates worldwide. Its domestic members generate approximately three-quarters of all the electricity generated by electric utilities in the country and serve about 70 percent of all ultimate customers in the nation

Attachment B. RG&E Voice Your Choice Customer Choice Results

Table 1

VYC Enrollments by Supply Option	2004 Enrollment Period		
	Total Customers Enrolled	Percent of Total Customers	Percent by Choice
Options			
Fixed price choice (FPO)	132,140	38.8%	76.9%
Variable price choice (VPO)	32,990	9.7%	19.2%
ESCO price choice (EPO) ²	2,445	0.7%	1.4%
ESCO option with supply adjustment (EOSA) ²	4,212	1.2%	2.5%
Total Customer Enrollments	171,787	50.4%	100%

VYC Enrollments by Customer Class	Count Number of Kits in Class	2004 Enrollment Period	
		Total Customers Enrolled	Enrollments as percent of Total Cust in Class
Service Classes			
RGE residential (SC01, 04)	312,527	160,172	51.3%
RGE small non-residential (SC02, 03, 07, 09, SL)	27,673	11,065	40.0%
RGE large non-residential (SC08, 10, 11, 12, 14) ¹	546	550	100.7%
Total	340,746	171,787	50.4%

VYC Enrollments by Source - Method	2004 Enrollment Period	
	Total Customers Enrolled	Percent of Total Customers Enrolled
Source		
Card or Customer Representative	138,447	80.9%
Web	16,251	9.5%
IVR	10,432	6.1%
ESCO ²	6,657	3.9%
Total	171,787	100%

¹ Number of kits is less than number of enrollments due to consolidation of kits to largest customers with multiple accounts.

² These numbers only reflect ESCO enrollments as of December 31, 2004.

Attachment C. RG&E *Voice Your Choice* Customer Migration as of March 31, 2005

Table 1

Electric Migration	Commercial, Industrial & Municipal Customers		Residential Customers		Total			
	# of Customers	Annual Use (kwh)	# of Customers	Annual Use (kwh)	# of Customers	% Increase	Annual Use (kwh)	Percent of Total Eligible System Load
30-Sep-04	10,090	2,247,978,258	34,625	322,397,972	44,715	n/a	2,570,376,230	28%
31-Mar-05	15,716	2,856,748,268	56,475	547,077,862	72,191	n/a	3,403,426,129	46%
Increase	5,626	608,770,010	21,850	224,679,890	27,476	61%	833,049,899	18%

Table 2

Gas Migration	Large Customers		Small Customers		Total			
	# of Customers	Annual Use (Dt)	# of Customers	Annual Use (Dt)	# of Customers	% Increase	Annual Use (Dt)	Percent of Total System Load
30-Sep-04	659	15,693,766	43,733	7,871,388	44,392	n/a	23,565,154	44%
31-Mar-05	649	14,692,948	47,444	8,208,234	48,093	n/a	22,901,182	43%
Increase	(10)	(1,000,818)	3,711	336,846	3,701	8%	(663,972)	(1%)