

**STATE OF INDIANA**

**INDIANA UTILITY REGULATORY COMMISSION**

**PETITION OF THE CITY OF RICHMOND, )**  
**INDIANA, BY AND THROUGH ITS )**  
**MUNICIPAL ELECTRIC UTILITY, )**  
**RICHMOND POWER AND LIGHT, FOR ) CAUSE NO. 45361**  
**APPROVAL OF A NEW SCHEDULE OF )**  
**RATES AND CHARGES FOR ELECTRIC )**  
**SERVICE AND FOR APPROVAL TO MODIFY )**  
**ITS ENERGY COST ADJUSTMENT )**  
**PROCEDURES )**

**PRE-FILED VERIFIED DIRECT TESTIMONY OF**

**LAURIE A. TOMCZYK**

**AND ATTACHMENT LAT-1 THRU LAT-4**

**ON BEHALF OF PETITIONER**

**RICHMOND POWER & LIGHT**

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**PETITIONER’S EXHIBIT NO. 2**

**March 25, 2020**

# Table of Contents

|   |     |
|---|-----|
| Direct Testimony of L. Tomczyk .....                            | 3   |
| Att. LAT-1 Tomczyk Resume .....                                 | 48  |
| Att. LAT-2 Redacted Revenue Requirement Model .....             | 53  |
| LAT WP-1 TY RR Adjustments Summary .....                        | 54  |
| LAT WP-2 Plant Adjustments Summary .....                        | 58  |
| LAT WP-3 Revenue Requirement Calculation .....                  | 61  |
| LAT WP-4 TY Actual and Adjusted Net Income .....                | 62  |
| LAT WP-5 Summary of TY RR Adjustments .....                     | 63  |
| LAT WP-6 FY20 IMPA Power Supply Costs .....                     | 66  |
| LAT WP-7 IMPA TY Power Supply Cost Normalization .....          | 67  |
| LAT WP-8 Labor and Benefits Adjustment .....                    | 68  |
| LAT WP-9 Plant in Service .....                                 | 70  |
| LAT WP-10 Depreciation Reserve .....                            | 72  |
| LAT WP-11 TY Plant Additions, Retirements and Adjustments ..... | 74  |
| LAT WP-12 Plant Net Retirements .....                           | 79  |
| LAT WP-13 Test Year Depreciation Expense .....                  | 81  |
| LAT WP-14 Depreciation Normalization .....                      | 82  |
| LAT WP-15 Projected Depreciation Expense .....                  | 84  |
| LAT WP-16 Capital Plan .....                                    | 85  |
| LAT WP-17 Rate Base Calculations .....                          | 86  |
| LAT WP-18 Working Capital .....                                 | 87  |
| LAT WP-19 Cash Reserves for Test Year .....                     | 88  |
| LAT WP-20 Large Customer Load Normalization .....               | 89  |
| LAT WP-21 Large Customer Load Migration .....                   | 90  |
| LAT WP-22 Test Year Trial Balance .....                         | 91  |
| LAT WP-23 Sources and Uses of Cash .....                        | 95  |
| LAT WP-24 WWVS Estimated Decommissioning Costs .....            | 97  |
| LAT WP-25 Non-Cash Portion of Pension Expense .....             | 98  |
| Att. LAT-3 ECA Final Order 1989 CN 36835-S3 .....               | 99  |
| Att. LAT-4 Proposed New ECA Model .....                         | 102 |

**Table of Contents**

I. INTRODUCTION AND QUALIFICATIONS ..... 3

II. OVERVIEW OF TESTIMONY ..... 6

III. GAO 2013-5 AND NOTICE OF INTENT..... 13

IV. REVENUE REQUIREMENT ANALYSIS ..... 14

V. RP&L’S PROPOSED SOURCES AND USES OF CASH..... 24

VI. RATE BASE ANALYSIS ..... 36

VII. ENERGY COST ADJUSTMENT CALCULATION ..... 39

VIII. SUMMARY AND CONCLUSIONS ..... 45

**I. INTRODUCTION AND QUALIFICATIONS**

**Q1. PLEASE STATE YOUR NAME AND ON WHOSE BEHALF YOU ARE TESTIFYING.**

A. My name is Laurie Tomczyk. I am employed as an Executive Consultant by NewGen Strategies and Solutions, LLC ("NewGen"). My business address is 4528 Trails End, Lapeer, Michigan. NewGen is a consulting firm that specializes in utility rates, engineering economics, financial accounting, asset valuation, appraisals, and business strategy for electric, natural gas, solid waste, water, and wastewater utilities. I am testifying on behalf of the Petitioner, Richmond Power & Light ("RP&L" or the "Utility"), which is the electric utility owned and operated by the City of Richmond, Indiana ("Richmond").

**Q2. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.**

A. I have been employed by NewGen since January 2014. Prior to joining NewGen, I was employed by R. W. Beck, Inc. or one of its successors since 1988. R.W. Beck, Inc. was eventually acquired by Science Applications International Corporation ("SAIC"), which is now Leidos Engineering LLC. Prior to joining R. W. Beck, I was employed by HDR, Inc. in Omaha, Nebraska from 1986 through mid-1988. I have over 30 years of experience in providing management consulting services to clients involved in the electric power, water, and solid waste management industries. I specialize in electric utility revenue requirement analyses, cost of service and rate design studies, financial projections, expert witness services, and other engineering and economic analyses. I have been an instructor on behalf of Electric Utility Consultants, Inc. for courses on cost of service concepts and techniques and rate design for electric utilities. I am a registered professional engineer in the State of Colorado.

**Q3. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE INDIANA UTILITY  
REGULATORY COMMISSION ("IURC" OR "COMMISSION")?**

A. Yes, my testimony before the IURC, as well as other state commissions on utility rate making matters is summarized in my resume included as Attachment LAT-1.

**Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. The first purpose of my testimony is to explain my analysis of RP&L's electric revenue requirements for the twelve months ended September 30, 2019 and to sponsor related financial exhibits of the Utility. The second purpose is to recommend changes to RP&L's calculation of its Energy Cost Adjustment ("ECA") tracker.

**Q5. WHICH OF THE MINIMUM STANDARD FILING REQUIREMENTS CONTAINED  
IN EXHIBIT 5 ARE YOU SPONSORING IN THIS CAUSE?**

A. I am sponsoring the following, which correspond to the respective Commission Minimum Standard Filing Requirement ("MSFR") found in 170 IAC 1-5 as indicated below:

- Exhibit 5 (170 IAC 1-5-6(2)) – Revenue Requirement Calculation
- Exhibit 5 (170 IAC 1-5-6(3)) – Net Operating Income – Actual Test Year and Adjusted Test Year
- Exhibit 5 (170 IAC 1-5-8(a)(1)) – Income Statement – Actual Test Year and Adjusted Test Year
- Exhibit 5 (170 IAC 1-5-8(a)(2)) – Test Year Pro Forma Adjustments
- Exhibit 5 (170 IAC 1-5-8(a)(24)) – Estimated Rate Case Expenses
- Exhibit 5 (170 IAC 1-5-8(a)(29)) – Taxes Other Than Income Taxes

- Exhibit 5 (170 IAC 1-5-9(a)(1)) – Proposed Rate Base
- Exhibit 5 (170 IAC 1-5-10(2)) - End of Test Year Balances for Plant in Service and Accumulated Depreciation
- Exhibit 5 (170 IAC 1-5-10(3)) – Utility Construction Budgets
- Exhibit 5 (170 IAC 1-5-10(4)) – Summary of Plant Additions By Subaccount
- Exhibit 5 (170 IAC 1-5-10(5)) – Schedule of Pro Forma Utility Additions Subsequent to Test Year
- Exhibit 5 (170 IAC 1-5-10(6)) – Criteria Used to Select Projects for Utility Additions
- Exhibit 5 (170 IAC 1-5-12(1)) – Cash Working Capital Studies

**Q6. WHAT ATTACHMENTS ARE YOU SPONSORING IN THIS CAUSE?**

A. I am sponsoring the following attachments to my direct testimony:

- Attachment LAT-1 – Resume of Laurie A. Tomczyk
- Attachment LAT-2 – Revenue Requirement and Sources and Uses of Cash Model
- Attachment LAT-3 – The Commission's Final Order in Cause No. 36835-S3, December 13, 1989 (establishing process for RP&L's ECA Tracker)
- Attachment LAT-4 – New ECA Model

**Q7. WERE THESE EXHIBITS AND ATTACHMENTS PREPARED BY YOU OR UNDER YOUR SUPERVISION?**

A. Yes.

**II. OVERVIEW OF TESTIMONY**

**Q8. PLEASE PROVIDE AN OVERVIEW OF YOUR TESTIMONY AND  
RECOMMENDATIONS.**

A. My testimony provides an overall recommended increase to RP&L's revenues from base rates and recommended changes to their current approach for recovery of future incremental changes to power costs through their ECA filings made on a quarterly basis with the IURC. RP&L requests recovery of the Utility's cost to serve customers using the historical test year ending September 30, 2019, including fixed, known and measurable adjustments through September 30, 2020. ("Test Year"). RP&L's overall requested rate relief for the Test Year is approximately \$7.7 million over current rate revenues of approximately \$80.7 million, resulting in a 9.6% average increase in rates. In his Direct Testimony, RP&L witness Joseph A. Mancinelli discusses in detail the Utility's proposal to implement the requested rate increase in three phases over a three-year period. In Phase I, revenue would increase by approximately \$2.4 million over current rate revenues or 2.9% of current rate revenues. In Phase II, revenue would increase to approximately \$5.1 million over current rate revenues or 6.3% of current rate revenues. The overall increase of 9.6% identified above would be implemented in Phase III, which would commence sometime in 2023 (three years after the Commission's Final Order in this Cause). Attachment LAT-2 shows the calculation of the revenue increase. The following table provides a summary. The Utility has presented substantial support for its revenue increase and related relief, in accordance with the GAO-2013-5 and the Commission's MSFRs.

1  
2  
3

**Table LAT-1**  
**Revenue Requirement Summary**

|                 |  | <b>A</b>                            | <b>B</b>           | <b>C</b>                      |
|-----------------|--|-------------------------------------|--------------------|-------------------------------|
| <b>Line No.</b> |  | <b>Test Year Actual<br/>Results</b> | <b>Adjustments</b> | <b>Adjusted Test<br/>Year</b> |
| 1               | Operation and Maintenance Expense                                    | \$75,183,843                        | \$834,897          | \$76,018,740                  |
| 2               | Depreciation & Amortization Expense                                  | 4,584,845                           | 2,151,151          | 6,735,996                     |
| 3               | Taxes (excluding Payments to City In-Lieu of Taxes)                  | 1,556,832                           | 163,620            | 1,720,452                     |
| 4               | Payments to City In-Lieu of Taxes                                    | 777,792                             | -                  | 777,792                       |
| 5               | Subtotal Revenue Requirement (Lines 1 +2 + 3 +4)                     | \$82,103,312                        | \$3,149,668        | \$85,252,980                  |
| 6               | Other Income and Expenses  | (\$549,242)                         | (\$581,121)        | (\$1,130,363)                 |
| 7               | Return on Rate Base  | (\$974,486)                         | \$5,305,073        | \$4,330,587                   |
| 8               | Total Revenue Requirement from Rates (Lines 5 + 6 + 7)               | \$80,579,584                        | \$7,873,620        | \$88,453,204                  |
| 9               | Rate Base  | \$66,054,623                        | (\$340,098)        | \$65,714,525                  |
| 10              | % Return on Rate Base (Line 7 / Line 9)                              | -1.48%                              |                    | 6.59%                         |
| 11              | Rate Revenue from Existing Rates                                     | \$80,579,584                        | \$137,772          | \$80,717,356                  |
| 12              | Required Change in Revenue Requirement from Rates (Line 8 – Line 11) |                                     |                    | \$7,735,848                   |
| 13              | % Increase to Rate Revenues from Current Rates (Line 12 / Line 11)   |                                     |                    | 9.6%                          |



1   **Q10.   ON WHAT BASIS WAS THE REVENUE REQUIREMENT DEVELOPED?**

2   A. The revenue requirement was developed on a utility basis, the components of which are shown  
3       in the above table and discussed below. This is the same basis used in the development of the  
4       revenue requirement in RP&L's last rate case. Under the utility basis approach, the return on  
5       rate base and depreciation expenses are used to recover capital-related costs on an accrual  
6       accounting basis. Private investor-owned utilities ("IOUs"), and some municipally owned  
7       utilities, use the utility basis approach for establishing revenue requirements for ratemaking  
8       purposes. Another common approach used by municipally-owned utilities is the cash basis  
9       approach. Under the cash basis approach, the actual cash needs of the utility are included in  
10      the determination of the revenue requirements. This includes debt service, O&M expenses, and  
11      other cash funding requirements of the utility including capital improvements.

12   **Q11.   WHY DID RP&L SELECT THE UTILITY APPROACH?**

13   A. The utility basis fairly spreads out the cost of an asset over its useful life. Also, over time, the  
14      utility basis usually leads to more stable rates. Under the cash approach, significant  
15      fluctuations in capital expenses may result in significant fluctuations in rates over time.

16   **Q12.   ARE THERE ANY OTHER IMPORTANT ITEMS TO NOTE REGARDING THE**  
17      **BASIS FOR THE PROPOSED REVENUE REQUIRMENT?**

18   A. Yes. The revenue requirement was developed for RP&L's electric utility, which excludes the  
19      telecommunication department of RP&L.<sup>1</sup> On April 18, 2001, RP&L's telecommunication  
20      department acquired the assets and customer accounts of a local area internet service provider

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<sup>1</sup> Prior to telecommunications deregulation in Indiana, RP&L received certificates of territorial authority from the Commission to provide local exchange and internet services in Cause Nos. 41721 and 42595.

1 and started providing internet service under the name Parallax Systems. Parallax Systems'  
2 departmental financials are not included in the financials used in the development of the  
3 proposed revenue requirement or rate base for municipal electric service.

4 **Q13. WHAT IS THE LEGAL FRAMEWORK YOU USED FOR DETERMINING THE**  
5 **REVENUE REQUIREMENT?**

6 A. The provisions in IC 8-1.5-3-8 were also taken into account when developing the revenue  
7 requirement. This statute includes the following requirements for determining the rates and  
8 charges for utilities owned by municipalities:

9 Sec. 8(a) A municipality owning a utility under this chapter shall furnish reasonably  
10 adequate services and facilities.

11  
12 (b) The rates and charges made by a municipality for a service rendered or to be  
13 rendered, either directly or in connection therewith, must be nondiscriminatory,  
14 reasonable, and just.

15  
16 (c) "Reasonable and just rates and charges for services" means rates and charges  
17 that produce sufficient revenue to:

18 (1) pay all the legal and other necessary expenses incident to the operation  
19 of the utility, including:

20 (A) maintenance costs;

21 (B) operating charges;

22 (C) upkeep;

23 (D) repairs;

24 (E) depreciation;

25 (F) interest charges on bonds or other obligations, including leases;  
26 and

27 (G) costs associated with the acquisition of utility property under IC  
28 8-1.5-2;

29 (2) provide a sinking fund for the liquidation of bonds or other obligations,  
30 including leases;

31 (3) provide a debt service reserve for bonds or other obligations, including  
32 leases, in an amount established by the municipality, not to exceed the  
33 maximum annual debt service on the bonds or obligations or the maximum  
34 annual lease rentals;

35 (4) provide adequate money for working capital;

36 (5) provide adequate money for making extensions and replacements to the  
37 extent not provided for through depreciation in subdivision (1); and

(6) provide money for the payment of any taxes that may be assessed against the utility.

(d) It is the intent of this section that the rates and charges produce an income sufficient to maintain the utility property in a sound physical and financial condition to render adequate and efficient service. Rates and charges too low to meet these requirements are unlawful.

(e) The board may recommend to the municipal legislative body rates and charges sufficient to include a reasonable return on the utility plant of the municipality.

**Q14. HOW ARE MUNICIPAL UTILITIES ALLOWED TO RECOVER A RETURN ON THEIR INVESTMENT THROUGH RATES?**

A. As shown above, under Indiana law, a utility service board may recommend to the municipal legislative body that the rates and charges for the utility include a reasonable return on the utility plant of the municipality. IC 8-1.5-3-8(e). Richmond's Utility Service Board recommended by Resolution, and the Richmond Common Council subsequently approved by Ordinance, rates for RP&L which include a reasonable return on rate base.

**Q15. HOW DOES THE USE OF THE UTILITY BASIS FOR DETERMINING REVENUE REQUIREMENTS COMPARE BETWEEN MUNICIPALLY-OWNED UTILITIES AND INVESTOR-OWNED UTILITIES ("IOUS")?**

A. Key components of a revenue requirement using the utility basis for both IOUs and municipally-owned utilities include the following:

- O&M Expenses – IOUs and municipally-owned utilities have similar types of O&M expenses;
- Depreciation and Amortization Expenses - IOU and municipally-owned utilities have similar types of depreciation and amortization expenses;

- 1           • Taxes – IOUs include state and federal income taxes under this category along  
2           with property and other types of taxes; municipally-owned utilities do not pay  
3           federal or state income taxes, but they do include in this category contributions to  
4           their city's general fund in lieu of local franchise fees and property taxes; both  
5           types of utilities pay other types of taxes such as the Indiana Utility Receipt Tax,  
6           with those costs being included in this category;
- 7           • Other Income and Expense Adjustments - Other sources of income not related to  
8           rate revenues are netted against the total system revenue requirement by both  
9           IOUs and municipally-owned utilities; common types include interest income and  
10          revenues from fees and charges related to connection fees, equipment rentals,  
11          service charges, maintenance agreements, etc.; other types of miscellaneous  
12          expenses are also included in this category such as interest expense on customer  
13          deposits;
- 14          • Return on Rate Base – Under the utility basis, both types of utilities include return  
15          on rate base as a component of their revenue requirements, but the use of the  
16          funds from the return on rate base differs in some important aspects.

17   **Q16. PLEASE EXPLAIN HOW THEY DIFFER.**

18   A. Non-profit municipally-owned utilities are known as “public power,” because they are  
19   “owned” by the public that they serve, like RP&L. Public power utilities’ rates are set to ensure  
20   that earnings are sufficient to cover the utility's costs and to maintain the financial health of the  
21   organization over time. The return on rate base is typically used to pay costs for debt service  
22   and capital improvements, as well as fund reserve accounts, and possibly provide additional  
23   funds to the City. Public power utilities are usually funded with tax-exempt debt, such as

1 municipal bond issuances, so revenues must also be sufficient to meet debt service coverage  
2 ratios specified in their bond covenants. The rate-setting process for IOUs, which are private,  
3 profit-making entities, is different than for public power utilities. Revenue requirements and  
4 rates for private IOUs must include an adequate return on equity or profit level for shareholders  
5 that is commensurate with the return level earned by other utilities and enterprises facing  
6 similar risks. Financing of IOU capital investment comes from debt investors that receive  
7 interest on their investment, and the equity investors that aim to receive dividends from profits  
8 achieved by the IOU.

9 **Q17. HOW IS THE APPROPRIATE LEVEL OF RETURN DETERMINED FOR A**  
10 **MUNICIPALLY-OWNED UTILITY?**

11 A. Municipal utilities are different from IOUs in that they cannot sell equity to raise capital, and  
12 thus the determination of a municipal utility's return is not based on the same type of analysis  
13 of an investor-owned utility's value in the capital marketplace. As discussed previously,  
14 municipal utilities' rates are set to ensure that earnings are sufficient to cover the utility's costs  
15 and to maintain the financial health of the organization over time. Thus, the review of a  
16 municipal utility's return is really a test for reasonableness, in which the Commission has broad  
17 discretion. Later in my testimony, I explain how RP&L's return was calculated, why it is  
18 reasonable, and how it enhances the Utility's cash flow requirements and overall financial  
19 integrity.

20 **Q18. PLEASE PROVIDE AN OVERVIEW OF THE ADJUSTMENTS AND**  
21 **ACCOUNTING AUTHORITY SUPPORTED BY YOUR TESTIMONY.**

A. RP&L's filing includes various fixed, known and measurable adjustments, normalizations and annualizations through September 30, 2020, each of which is identified in Attachment LAT-2 at pages 1-6 and summarized in the above table. The adjustments address:

- Operation and Maintenance ("O&M") Expenses;
- Depreciation and Amortization Expenses;
- Utilities Receipt Taxes;
- Return on Rate Base;
- Other Income and Expenses; and
- Rate Revenues.

In accordance with 170 IAC 1-5-5 accounting methodology and guidelines for cutoffs, adjustments were made that are fixed, known, measurable, and will occur within twelve months of the end of the test year, which is September 30, 2020.

### **III. GAO 2013-5 AND NOTICE OF INTENT**

#### **Q19. HAVE YOU REVIEWED GENERAL ADMINISTRATIVE ORDER ("GAO") 2013- IN PREPARATION OF THIS FILING?**

A. Yes. The GAO sets forth recommendations for what is to be included in a utility's case-in-chief during a rate case proceeding and the use of the MSFRs. These guidelines help facilitate the Commission's, the Indiana Office of the Utility Consumer Counselor's ("OUCC's") and other interested parties' review of the evidence in a rate case to meet the 300 day statutory deadline for a Final Order from the Commission.

#### **Q20. DID RP&L INCORPORATE THE GUIDANCE PROVIDED IN GAO 2013-5 IN THIS FILING?**

1 A. Yes, however, the MSFR requirements are geared primarily to rate cases from investor-owned  
2 utilities and do not always easily apply to municipally-owned utilities. Where there are such  
3 differences, it is noted in the MSFR Exhibit 5. For example, municipally-owned electric  
4 utilities are not rate regulated by the Federal Energy Regulatory Commission ("FERC") or the  
5 Securities and Exchange Commission ("SEC"), are not corporate entities, do not have  
6 shareholders, and public power rates are not set under the "fair value" concept.

7 **IV. REVENUE REQUIREMENT ANALYSIS**

8 **Q21. DID YOU PERFORM AN ANALYSIS COMPUTING RP&L'S REVENUE**  
9 **REQUIREMENTS?**

10 A. Yes.

11 **Q22. HAVE YOU PREPARED ATTACHMENTS SHOWING THE DETERMINATION**  
12 **OF REVENUE REQUIREMENTS AND RATE BASE FOR RP&L USING THE**  
13 **UTILITY APPROACH?**

14 A. Yes. Attachment LAT-2 shows the determination of the Test Year revenue requirements and  
15 rate base for RP&L including necessary adjustments (the "Adjusted Test Year"). Pages 1  
16 through 4 of Attachment LAT-2 show actual operating results for the Test Year and then  
17 Adjusted Test Year revenue requirements and the amounts of each adjustment. Pages 5  
18 through 7 show actual Test Year gross plant in service and accumulated depreciation and then  
19 Adjusted Test Year amounts including a list of adjustments. Pages 8 and 9 provide summaries  
20 of the revenue requirement and calculation of net income for the actual Test Year and Adjusted  
21 Test Year. A summary of the rate base is shown on page 33. Pages 10 through 12 provide a  
22 brief description of the adjustments and the adjustment amounts, while the balance of pages  
23 through page 41 provide additional support for the related adjustments. Pages 42 through 45

1 present an analysis of sources and uses of cash that is discussed later in my testimony. The  
2 following table summarizes the Test Year Actual Results, requested adjustments to actual  
3 results, and the proposed Adjusted Test Year revenue requirements.



1  
2

**Table LAT-2**  
**Test Year Actual Results and Proposed Adjusted Test Year Revenue Requirements**

| Line No. |  | A<br>Test Year<br>Actual<br>Results | B<br>Adjustments   | C<br>Adj No     | D<br>Adjusted<br>Test Year |
|----------|--|-------------------------------------|--------------------|-----------------|----------------------------|
| 1        | <b>Operation and Maintenance Expense</b>                                     |                                     |                    |                 |                            |
| 2        | Purchased Power  | \$63,003,797                        | \$405,349          | (1)             | \$63,409,146               |
| 3        | Distribution Operations and Maintenance                                      | 4,041,025                           | 260,390            | (2)             | 4,301,415                  |
| 5        | Customer Accounts & Service  | 1,335,814                           | 46,088             | (2)(3)(4)       | 1,381,108                  |
| 6        | Administrative and General   | 6,803,207                           | 123,070            | (2)(5)(6)       | 6,926,277                  |
| 7        | Subtotal Operation and Maintenance Expense<br>(Sum of Lines 2 through 7)     | \$75,183,843                        | \$834,897          |                 | \$76,018,740               |
| 8        | <b>Depreciation &amp; Amortization Expense</b>                               |                                     |                    |                 |                            |
| 9        | Utility Plant Depreciation   | \$4,584,845                         | (\$528,849)        | (7)             | \$4,055,996                |
| 10       | Environmental Remediation Liability<br>Amortization                          | -                                   | 2,680,000          | (8)             | 2,680,000                  |
| 11       | <b>Subtotal Depreciation &amp; Amortization<br/>Expense (Lines 9 +10)</b>    | \$4,584,845                         | \$2,151,151        |                 | \$6,735,996                |
| 12       | <b>Taxes (excluding Payments to City In-Lieu of<br/>Taxes)</b>               | \$1,556,832                         | \$163,620          | (9)(10)         | \$1,720,452                |
| 13       | <b>Payments to City In-Lieu of Taxes</b>                                     | \$777,792                           | -                  |                 | \$777,792                  |
| 14       | Subtotal Revenue Requirement (Lines 7 +11 +<br>12 +13)                       | \$82,103,312                        | \$3,149,668        |                 | \$85,252,980               |
| 15       | <b>Less Other Income and Expenses</b>  |                                     |                    |                 |                            |
| 16       | Other Operating Revenues   | (\$1,031,274)                       | \$-                |                 | (\$1,031,274)              |
| 17       | Non-Operating Revenues   | (156,713)                           | 50,756             | (11)(12)        | (105,957)                  |
| 18       | Other Deductions   | 638,745                             | (631,877)          | (13)            | 6,868                      |
| 19       | Subtotal Less Other Income (Lines 16 + 17 +<br>18)                           | (\$549,242)                         | (\$581,121)        |                 | (\$1,130,363)              |
| 20       | <b>Return on Rate Base</b>   | (\$974,486)                         | \$5,305,073        | (14)            | \$4,330,587                |
| 21       | <b>Total Revenue Requirement from Rates<br/>(Lines 14 + 19 + 20)</b>         | <b>\$80,579,584</b>                 | <b>\$7,873,620</b> |                 | <b>\$88,453,204</b>        |
| 22       | <b>Rate Base</b>   | <b>\$66,054,623</b>                 | <b>(\$340,098)</b> |                 | <b>\$65,714,525</b>        |
| 23       | <b>% Return on Rate Base (Line 20 / Line 22)</b>                             | <b>-1.48%</b>                       |                    |                 | <b>6.59%</b>               |
| 24       | <b>Rate Revenue from Existing Rates</b>                                      | <b>\$80,579,584</b>                 | <b>\$137,772</b>   | <b>(15)(16)</b> | <b>\$80,717,356</b>        |
| 25       | <b>Required Change in Revenue Requirement<br/>from Rates (Lines 21 - 24)</b> |                                     |                    |                 | <b>\$7,735,848</b>         |
| 26       | <b>% Increase to Rate Revenues from Current<br/>Rates (Line 25/ Line 24)</b> |                                     |                    |                 | <b>9.6%</b>                |

**Q23. WHAT ARE THE ACTUAL OPERATING RESULTS AND THE EFFECT OF THE  
PRO FORMA ADJUSTMENTS SHOWN IN TABLE LAT-2 AND ATTACHMENT  
LAT-2?**

A. The actual return on rate base for the 12 months ended September 30, 2019, or Test Year as shown in Attachment LAT-2 (page 33) and Table LAT-2, is a negative \$974,486, or -1.48% as a percent of rate base. On a pro forma basis, RP&L would still experience a significant negative return on rate base for the Adjusted Test Year without an increase in rates. A revenue increase of \$7,735,848 is required to reach RP&L's pro forma revenue requirement of \$88,453,204 for the Adjusted Test Year, which achieves the targeted return on rate base equal to 6.59%, or \$4,330,587. *Id.* This equates to an increase in base rate revenues of 9.6%.

**Q24. PLEASE IDENTIFY WHAT IS INCLUDED IN THE ADJUSTMENTS NOS. 1  
THROUGH 6 MADE TO O&M EXPENSES.**

A. The O&M adjustments that total \$834,897 as shown in Attachment LAT-2 (pages 1 through 4 and pages 10 through 12) and Table LAT-2 include:

- Adjustment No. 1 was made to purchased power expenses. Purchased power expenses were adjusted by \$405,349 to account for the following:
  - Projected changes in IMPA demand and energy rates for the last quarter of 2019 and the first three quarters of 2020; and
  - Anticipated increases in sales to a large customer for the last quarter of 2019 and the first three quarters of 2020.
- Adjustment No. 2 was made to labor expenses. Labor expenses were adjusted by \$254,123 to represent projected labor expense for the last quarter of 2019 and the first three quarters of 2020.

- 1       • Adjustment Nos. 3 and 4 were made to customer service and sales expenses.  
2       Customer service and sales expenses were reduced by \$17,117 to exclude advertising  
3       expenses and increased by \$29,774 to account for increased uncollectibles associated  
4       with the proposed rate increase.
- 5       • Adjustment Nos. 5 and 6 were made to administrative and general expenses.  
6       Administrative and general expenses were adjusted for the following:  
7       ○ Amortized rate case expenses associated with this rate case equal to \$50,000 per  
8       year; and  
9       ○ Changes in costs of employee benefits associated with the labor expense  
10      adjustment equal to \$112,768.

11   **Q25. PLEASE DESCRIBE HOW ADJUSTMENT NO. 7 WAS MADE TO UTILITY**  
12   **PLANT DEPRECIATION EXPENSES.**

13   A. Adjusted Test Year utility plant depreciation is projected to be \$528,849 less than actuals for  
14   the Test Year. The steps used to make this adjustment were as follows:

- 15       • As part of the rate base calculation, the 13-month average plant in service for the  
16       period ending September 30, 2020, was calculated as described later in my  
17       testimony. This was done by FERC account.
- 18       • RP&L's depreciation rates were applied to the adjusted test year plant balances by  
19       FERC account.
- 20       • For certain FERC plant accounts, primarily associated with RP&L's Whitewater  
21       Valley Station ("WWVS"), plant was not fully depreciated at the end of the test  
22       year but will become fully depreciated during the period ending September 30,  
23       2020. Therefore, adjustments were made to reduce or eliminate the depreciation

1 expenses associated with these accounts for the adjusted test year depending on the  
2 amounts not yet depreciated at the end of the test year. This is the primary reason  
3 that the adjusted test year depreciation expenses are less than the actual test year  
4 depreciation expenses.

5 **Q26. PLEASE EXPLAIN ADJUSTMENT NO. 8 RELATED TO ENVIRONMENTAL**  
6 **REMEDiation LIABILITY AMORTIZATION.**

7 A. As also discussed in the testimony of Randall Baker, RP&L seeks closure of an inactive surface  
8 impoundment that was used to store bottom and fly ash from WWVS. In compliance with the  
9 Federal Coal Combustion Residual ("CCR") Rule, Title 40 CFR Part 257, inactive surface  
10 impoundments are required to close either by removing CCR from the impoundment or by  
11 capping the CCR in place. RP&L contracted with an engineering firm to determine the  
12 probable cost of the closure. The Environmental Remediation Liability on RP&L's balance  
13 sheet, equal to \$12,374,806 at the end of the Test Year, is equal to the engineer's opinion of  
14 probable cost for capping in place in 2019 dollars equal to \$13,665,877, less associated  
15 expenditures already made by RP&L. In comparison, the engineer's opinion of probable costs  
16 for removing the CCR under various scenarios ranged from \$30 million to \$42 million in 2019  
17 dollars. RP&L believes it is prudent to include in its revenue requirement an amount equal to  
18 \$2,474,169 in 2019 dollars, which is equal to the Environmental Remediation Liability of  
19 \$12,374,806 in 2019 dollars amortized over a five-year period. This annual amortized amount  
20 in 2019 dollars was then increased using an inflation factor of 2 percent per year through 2025.  
21 The inflated average for years 2021 through 2025 is equal to \$2,680,000 and, thus, this amount  
22 was included in the revenue requirement for environmental remediation. These calculations  
23 may be found on page 11 of Attachment LAT-2.

**Q27. WHY IS THE ENVIRONMENTAL REMEDIATION LIABILITY AMORTIZED  
OVER A 5-YEAR PERIOD?**

A. On May 30, 2014, RP&L entered into an agreement with the Indiana Municipal Power Agency (“IMPA”) to turn over operation of WWVS to the IMPA organization. Under the agreement, IMPA is responsible for all operational costs of the generating station, has agreed to operate and make certain investments in the generation station, and is required to pay a monthly lease payment of \$500, which is deducted from the monthly Purchased Power invoice sent to the RP&L. All of the output of the station goes to IMPA for the benefit of all of its members. The assets of the station remain the property of the RP&L, and RP&L is responsible for the closure costs of the ash surface impoundment. In IMPA’s 2017 Integrated Resource Plan, IMPA’s preferred resource expansion plan assumes retirement of WWVS at the end of 2025 based on an optimization run under base conditions. If the rates resulting from this rate case take effect in early 2021, this would provide a five-year period over which to collect the funds needed for the entire environmental remediation.

**Q28. ARE YOU AWARE OF ANY OTHER RECENT CASES IN INDIANA RELATED  
TO UTILITIES RECOVERING COAL ASH REMEDIATION COSTS THROUGH  
RATES?**

A. Yes. The OUCC and Southern Indiana Gas and Electric Company (known as “Vectren”) recently entered into a settlement agreement in pending Cause No. 45280 regarding remediation costs for the ash pond at the A.B. Brown generating station. The agreement includes recovery of \$156 million of federally mandated costs for removal of the coal ash, the sale of the ash to an out of state cement manufacturer, and use of the proceeds of at least \$25 million to offset excavation costs that could otherwise be recovered through rates. Under the

1 settlement agreement, Vectren is authorized to timely recover 80% of the approved federally  
2 mandated costs through Vectren's Environmental Cost Adjustment mechanism, as well as  
3 costs for after placement in- service and operation of the Brown Pond Compliance Project  
4 including post in-service carrying costs, both debt and equity, and defended depreciation  
5 expense for the compliance project. Also under the settlement agreement, Vectren is  
6 authorized to recover the remaining 20% of federally mandated costs in rates established in  
7 their next rate case. The IURC settlement hearing is scheduled for late February.

8 **Q29. WHY DID YOU NOT ASSUME THAT RP&L WOULD ISSUE DEBT TO COVER**  
9 **THESE ENVIRONMENTAL REMEDIATION COSTS?**

10 A. Issuance of debt would result in future rate payers paying for these costs over many more years  
11 beyond the retirement date for WWVS without any corresponding benefits to those rate payers  
12 during those additional years. This goes against the standard ratemaking principle that the  
13 customer that caused the utility to incur the cost should in turn pay the cost ("cost-causer, cost  
14 payer").

15 **Q30. WHY IS THE ESTABLISHMENT OF A RESERVE FOR ENVIRONMENTAL**  
16 **REMEDATION COSTS NECESSARY AND PRUDENT FOR RP&L'S FINANCIAL**  
17 **INTEGRITY?**

18 A. The environmental remediation costs for WWVS will be significant. In order to assure  
19 RP&L's financial integrity, it is important to begin setting aside funds for this remediation.  
20 Future ratepayers should not be responsible for these costs, to the extent possible, since they  
21 will not receive any associated benefits.

22 **Q31. WHAT ADJUSTMENTS WERE MADE TO TAXES?**

1 A. For Adjustment No. 9, FICA-related taxes were adjusted by \$53,389 to account for additional  
2 taxes related to the labor expense normalization. Also, utility receipts taxes were adjusted by  
3 \$110,231 to account for increases related to the proposed increase in rate revenues under  
4 Adjustment No. 10.

5 **Q32. WHY WERE ADJUSTMENTS TALLING \$50,576 MADE TO NON-**  
6 **OPERATING REVENUES?**

7 A. RP&L's 2008 bond financing, which was approved in Cause No. 43375, was repaid by the end  
8 of 2017. Adjustment No. 11 was made to remove interest income equal to \$445 during the Test  
9 Year on a bond reserve fund that RP&L no longer maintains. Adjustment No. 12 was made to  
10 remove \$50,311 of interest income from RP&L's subsidiary named Parallax Systems, which  
11 is not electric-related.

12 **Q33. WHAT DOES ADJUSTMENT NO. 13 TO OTHER DEDUCTIONS EQUAL TO**  
13 **\$631,877 REPRESENT?**

14 A. This is the amount that RP&L spent on environmental remediation during the Test Year. These  
15 environmental remediation costs included expenses such as on-going CCR compliance and  
16 reporting, removing trees that could threaten the integrity of the ash pond, and testing nearby  
17 wells. Because the amortized costs of the environmental remediation were added to the  
18 revenue requirement, these associated expenses were removed.

19 **Q34. HOW IS A RETURN ON RATE BASE TYPICALLY DETERMINED?**

20 A. Rate base is determined by adding the net investment in the utility's plant and an allowance  
21 for working capital. The percentage return component is determined using a weighted average  
22 cost of capital ("WACC") approach, which takes a weighted average of a utility's cost of debt,

1 preferred stock, and equity, as applicable. Indiana law provides that a municipality's  
2 legislative body may elect to include in the revenue requirement a reasonable return on the  
3 utility's plant (known as "rate base").<sup>2</sup>

4 **Q35. FOR ADJUSTMENT NO. 14, PLEASE EXPLAIN HOW THE PROPOSED**  
5 **RETURN ON RATE BASE FOR THE ADJUSTED TEST YEAR WAS CALCULATED.**

6 A. The rate base amount for the Adjusted Test Year equal to \$65,714,361, as shown in Table  
7 LAT-2, was multiplied by an assumed WACC equal to 6.59%.

8 **Q36. HOW WAS THE PROPOSED WACC EQUAL TO 6.59% DERIVED?**

9 A. As of the end of 2017, RP&L no longer had any long-term debt. Therefore, a proxy cost of  
10 debt equal to 4.59% was used, which was derived from available industry data for long-term  
11 municipal tax-exempt investment grade bonds. Then, 200 basis points were added to arrive at  
12 the WACC of 6.59%. Based on my experience with other municipal utilities and electric  
13 cooperatives, as well as a review of recent spreads between WACCs and cost of debt requested  
14 and/or approved for investor-owned utilities in Indiana, this is a reasonable request for RP&L.

15 **Q37. PLEASE EXPLAIN WHY IN YOUR OPINION, A WACC EQUAL TO 6.59%**  
16 **REPRESENTS A FAIR, JUST, AND REASONABLE RETURN FOR RP&L.**

17 A. In contrast to an investor-owned utility, RP&L is "owned" by a non-profit, municipal  
18 government. To continue to operate successfully and provide safe and reliable service to its  
19 customers, RP&L must be able to earn a fair, just, and reasonable return on its property, just  
20 like an investor-owned utility. With a reasonable return, municipal utilities receive revenue  
21 only sufficient to meet minimum cash flow requirements. In RP&L's last rate case, the

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<sup>2</sup> See IC 8-1.5-3-8(e) and *City of Logansport v. Pub. Serv. Comm'n*, 177 N.E. 249 (Ind. 1931).



Commission approved an as-settled 5.10% return on the Utility's net plant in service. Later in my testimony, I show how the return based on a 6.59% WACC is necessary to meet RP&L's minimum cash flow requirements.

**Q38. WHY WERE ADJUSTMENT NOS. 15 AND 16 MADE TO RATE REVENUES FROM EXISTING RATES?**

A. One of RP&L's largest customers served under the Large Power Service Optional Coincident Peak Service ("LP-COIN") rate schedule has experienced significant increases in load over the last several months. Therefore, Adjustment No. 15 to rate revenues from existing rates, equal to \$356,111, was made to adjust revenues such that they represent revenues expected to be received from this customer for the 12-month period ending September 30, 2020. Adjustment No. 16 was made to represent an anticipated decrease in rate revenues equal to \$218,339 associated with moving a customer from the Large Power Service Optional Coincident Peak Service rate schedule to the Industrial Primary Rate Schedule. This is further addressed by RP&L witness Joseph A. Mancinelli in his pre-filed direct testimony.

**V. RP&L'S PROPOSED SOURCES AND USES OF CASH**

**Q39. DID YOU PERFORM AN ANALYSIS OF RP&L'S PROPOSED SOURCES AND USES OF CASH?**

A. Yes. A summary of this analysis is shown in Table LAT-3 below, and details are included in Attachment LAT-2, pages 42 and 43).

1  
2  
3

**Table LAT-3**  
**Summary of RP&L's Proposed**  
**Sources and Uses of Cash**

| Line No.                            | Component  | A<br>Adjusted<br>Test Year | B<br>Phase 1<br>Year 2021 | C<br>Phase 2<br>Year 2022 | D<br>Phase 3<br>Year 2023 |
|-------------------------------------|--|----------------------------|---------------------------|---------------------------|---------------------------|
| <b>Determination of Net Income:</b> |  |                            |                           |                           |                           |
| 1                                   | <b>Operating Revenues</b>                                |                            |                           |                           |                           |
|                                     |  |                            | \$83,087,56               |                           |                           |
| 2                                   | Revenues from Proposed Rates                             | \$88,453,204               | 9                         | \$85,801,175              | \$88,459,774              |
| 3                                   | Other Operating Revenues                                 | 1,031,274                  | 1,031,274                 | 1,031,274                 | 1,031,274                 |
|                                     |  |                            | \$84,118,84               |                           |                           |
| 4                                   | Total Operating Revenues (Lines 2 + 3)                   | \$89,484,478               | 3                         | \$86,832,449              | \$89,491,048              |
| 5                                   | <b>Operating Expenses</b>                                |                            |                           |                           |                           |
|                                     |  |                            | \$63,409,14               |                           |                           |
| 6                                   | Power Cost   | \$63,409,146               | 6                         | \$63,409,146              | \$63,409,146              |
| 7                                   | Other O&M Expenses Excl Uncollectibles                   | 12,275,112                 | 12,275,112                | 12,275,112                | 12,275,112                |
| 8                                   | Uncollectibles   | 334,482                    | 314,192                   | 324,453                   | 334,506                   |
| 9                                   | Depreciation   | 4,055,996                  | 4,055,996                 | 4,055,996                 | 4,055,996                 |
| 10                                  | Utilities Receipt Taxes                                  | 1,218,373                  | 1,145,317                 | 1,182,264                 | 1,218,463                 |
| 11                                  | Other Taxes  | 502,078                    | 502,078                   | 502,078                   | 502,078                   |
|                                     |  |                            | \$81,703,31               |                           |                           |
| 12                                  | Subtotal Operating Expenses (Sum of Lines 6 thru 11)     | \$81,795,188               | 5                         | \$81,748,571              | \$81,795,188              |
| 13                                  | <b>Non-Operating Revenues and Expenses</b>               |                            |                           |                           |                           |
| 14                                  | Interest and Investment Revenue                          | \$98,015                   | \$98,015                  | \$98,015                  | \$98,015                  |
| 15                                  | Other Income and Deductions                              | 1,074                      | 1,074                     | 1,074                     | 1,074                     |
| 16                                  | Payment to City In-Lieu of Taxes                         | (777,792)                  | (777,792)                 | (777,792)                 | (777,792)                 |
| 17                                  | Environmental Remediation                                | (2,680,000)                | (2,680,000)               | (2,680,000)               | (2,680,000)               |
| 18                                  | Subtotal Non-Ops Revs and Exps (Sum of Lines 14-17)      | -\$3,358,703               | \$3,358,703               | -\$3,358,703              | -\$3,358,703              |
| 19                                  | <b>Net Income or Return (Line 4 - Line 12 + Line 18)</b> | \$4,330,587                | (\$941,702)               | \$1,724,695               | \$4,337,043               |
|                                     |  |                            | \$65,714,52               |                           |                           |
| 20                                  | <b>Rate Base</b>   | \$65,714,525               | 5                         | \$65,714,525              | \$65,714,525              |
| 21                                  | <b>Return on Rate Base (Line 19 / Line 20)</b>           | 6.59%                      | -1.43%                    | 2.62%                     | 6.60%                     |

**Sources and Uses of Cash:**

|    |  |              |               |               |              |
|----|--|--------------|---------------|---------------|--------------|
| 22 | <b>Sources</b>                                       |              |               |               |              |
| 23 | Net Income or Return (Line 19)                       | \$4,330,587  | (\$941,702)   | \$1,724,695   | \$4,337,043  |
| 24 | Depreciation Expense (Line 9)                        | 4,055,996    | 4,055,996     | 4,055,996     | 4,055,996    |
| 25 | Environmental Remediation Amortization (Line 17)     | 2,680,000    | 2,680,000     | 2,680,000     | 2,680,000    |
| 26 | Rate Case Amortization                               | 50,000       | 50,000        | 50,000        | 50,000       |
| 27 | Non-Cash Portion of Pension Expense                  | 1,620,304    | 1,620,304     | 1,620,304     | 1,620,304    |
| 28 | Total Sources (Sum of Lines 23 thru 27)              | \$12,736,887 | \$7,464,598   | \$10,130,996  | \$12,743,343 |
| 29 | <b>Uses</b>  |              |               |               |              |
| 30 | Capital Projects                                     | \$3,564,545  | \$3,564,545   | \$3,564,545   | \$3,564,545  |
| 32 | Remediation Reserve Fund Deposits (equal to Line 25) | 2,680,000    | 2,680,000     | 2,680,000     | 2,680,000    |
| 32 | Decommissioning Reserve Fund Deposits                | 1,843,964    | 1,843,964     | 1,843,964     | 1,843,964    |
| 33 | Cash Reserve Fund Deposits                           | 730,658      | 730,658       | 730,658       | 730,658      |
| 34 | Appropriation of Retained Earnings to City           | 1,361,917    | 1,361,917     | 1,361,917     | 1,361,917    |
| 35 | Total Uses (Sum of Lines 30-34)                      | \$10,181,083 | \$10,181,083  | \$10,181,083  | \$10,181,083 |
| 36 | Annual Net Cash Gain (Loss) (Line 28 - Line 35)      | \$2,554,804  | (\$2,716,486) | (\$50,088)    | \$2,562,260  |
| 37 | Cumulative Net Cash Gain (Loss) (based on Line 36)   |              | (\$2,716,486) | (\$2,766,574) | (\$204,314)  |

**Q40. PLEASE PROVIDE A BRIEF OVERVIEW OF THE INFORMATION IN THIS TABLE.**

A. This table is split into two main sections. The first section in Lines 1 through 21 shows a calculation of net income for the Adjusted Test Year and then for Phases I through III during which time rate increases will be phased in over time as discussed previously. The second section in Lines 22 through 37 shows an analysis of sources and uses of cash for the Adjusted Test Year and the three rate phase-in periods.

**Q41. WHAT IS IMPORTANT TO NOTE REGARDING THE CALCULATION OF NET INCOME IN THIS TABLE?**

A. First, the revenues from proposed rates in Line 2 for the Adjusted Test Year are equal to the full revenue requirements being proposed by RP&L. The revenues shown in Line 2 for Phases I through III are consistent with the rate phase-in plan discussed by RP&L witness Joseph A. Mancinelli in his pre-filed direct testimony. The revenues for the Adjusted Test Year and all three rate phase-in periods were calculated assuming the same levels of sales in kilowatt-hours (“kWh”). In other words, no increases or decreases in sales during the phase-in periods from those used in the Adjusted Test Year were assumed in this analysis.

Second, for simplification purposes, the following were all assumed to be the same during the Adjusted Test Year and all three phase-in periods:

- Other Operating Revenues (Line 3);
- Power Costs and Other O&M Expenses Excluding Uncollectibles (Lines 6 and 7);
- Depreciation Expense (Line 9);
- Other Taxes (Line 11); and
- Other Non-Operating Revenues and Expenses (Lines 14 through 17).

1 Third, uncollectibles expense on Line 8 and utilities receipt taxes on Line 10 were  
2 adjusted proportionately to differences in revenues from proposed rates on Line 2.

3 Fourth, the rate base on Line 20 is assumed to remain at Adjusted Test Year levels in  
4 all three phase-in periods for simplification purposes.

5 Fifth, for the Adjusted Test Year and each phase-in period, the net income or return on  
6 Line 19 is equal to the operating revenues on Line 4 less the operating expenses on Line 12  
7 plus the net non-operating income and expenses on Line 19.

8 Finally, the return on rate base for the Adjusted Test Year and each phase-in period is  
9 calculated on Line 21 and is equal to the net income or return on Line 19 divided by the rate  
10 base on Line 20.

11 **Q42. WHAT DO THE RESULTS OF THE NET INCOME ANALYSIS SHOW?**

12 A. While the proposed return on rate base in the Adjusted Test Year is equal to 6.59%, this rate  
13 of return will not be achieved during Phases I and II. In fact, the rate of return calculated for  
14 Phase I is a negative 1.43%, and the rate of return calculated for Phase II is 2.62%. This is  
15 significant because the annual amount of cash available to RP&L from the net income in  
16 Phases I and II is significantly less than the amount available in the Adjusted Test Year. In  
17 fact, the net income for Phase I is less than that for the Adjusted Test Year by \$5,272,289 and  
18 the net income for Phase II is less than that for the Adjusted Test Year by \$2,605,892.  
19 Furthermore, as discussed in the direct testimony of RP&L witness Joseph A. Mancinelli, the  
20 effective cumulative average return on rate base over the next 10 years will never achieve the  
21 target of 6.59% return on revenue.

**Q43. PLEASE PROVIDE A BRIEF OVERVIEW OF THE SOURCES OF CASH SHOWN IN TABLE LAT-3.**

A. The sources of cash include net income as well as non-cash items included in the revenue requirement and net income analysis. The net incomes or returns on Line 23 are equal to those on Line 19 of the net income analysis. The net incomes or returns have been reduced in the net income analysis by the amount of the following expenses that are non-cash items, and because these are non-cash expenses that will be recovered through rates as cash, the associated amounts should be included as sources of cash:

- Depreciation Expense
- Environmental Remediation Amortization Expense
- Rate Case Amortization Expense
- Non-Cash Portion of Pension Expense

For simplification purposes, all of these non-cash expenses have been assumed to be equal for the Adjusted Test Year and all phase-in periods.

**Q44. PLEASE PROVIDE A BRIEF OVERVIEW OF THE USES OF CASH IN TABLE LAT-3.**

A. The uses of cash shown in Table LAT-3 include the following:

- Capital Projects: For simplification purposes, the amount included for capital projects is the same for the Adjusted Test Year and each phase-in period. This is the amount used for developing adjustments to the Test Year rate base as described later in my testimony.

- 1       • Remediation Reserve Fund Deposits: These amounts are equal to the environmental  
2       remediation amortization expense included in the Adjusted Test Year revenue  
3       requirements and net income analysis in Table LAT-3. This assumes that RP&L will  
4       make deposits equal to this amount in a reserve fund each year from which remediation  
5       costs will be paid as incurred over time.
- 6       • Decommissioning Reserve Fund Deposits: This amount, which is assumed to be the  
7       same for the Adjusted Test Year and all phase-in periods, is equal to cash that should  
8       annually be deposited into a reserve fund for dismantlement of WWVS at the end of its  
9       useful life. The approach and assumptions used to develop this amount are discussed  
10      later in my testimony. Under the agreements between RP&L and IMPA, RP&L has  
11      the responsibility for dismantlement costs associated with WWVS.
- 12      • Cash Reserve Fund Deposits: This amount, which is assumed to be the same for the  
13      Adjusted Test Year and all phase-in periods, is equal to cash that should annually be  
14      deposited into a reserve fund for the purposes of building up RP&L's cash reserves as  
15      discussed later in my testimony.
- 16      • Appropriation of Retained Earnings to the City: The Test Year includes a cash payment  
17      to the City from RP&L in the amount of \$1,361,917 as an appropriation of retained  
18      earnings.<sup>3</sup> This differs from the annual payment that RP&L makes to the City in-lieu  
19      of taxes<sup>4</sup> equal to \$777,792 as shown in Line 16 of Table LAT-3. The assumption in  
20      this analysis is that the payment for appropriation of retained earnings will come out of

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<sup>3</sup> The City Council, with the approval of RP&L's board, may transfer surplus earnings of the Utility to the City. See IC 8-1.5-3-11 and Attachment RWB5 to the Direct Testimony of Randall W. Baker (Council Ordinance and USB Resolution).

<sup>4</sup> See IC 8-1.5-3-8(g).

1 the return earned by RP&L on its rate base, or from other sources of cash shown in  
2 Table LAT-3 if necessary.

3 **Q45. PLEASE EXPLAIN HOW THE AMOUNT OF \$1,843,964 FOR DEPOSITS TO THE**  
4 **DECOMMISSIONING RESERVE FUND WAS DETERMINED.**

5 A. I relied on other industry data related to coal plant decommissioning costs for purposes of  
6 developing this estimate. Information was gathered from utility rate case filings and public  
7 utility commission ("PUC") orders, as well as other sources, regarding coal plant  
8 decommissioning costs used by other utilities. This analysis of decommissioning cost data  
9 included a review of utility filings and commission orders, as well as other data, from Arizona,  
10 Arkansas, Colorado, Florida, Georgia, Indiana, Louisiana, Nevada, New Mexico, and Texas.  
11 The information gathered showed coal plant dismantlement costs ranging from \$47 per  
12 kilowatt ("kW") to \$141 per kW, as adjusted to 2019 dollars. The average was \$76.47 per kW  
13 in 2019 dollars. Most of these estimates were for much larger coal plants than WWVS, so  
14 economies of scale would dictate that RP&L's costs for dismantlement of WWVS would likely  
15 be higher on a per kW basis. However, I did not take into account economies of scale in my  
16 analysis. Rather, I applied the average \$76.47 per kW in 2019 dollars to the nameplate capacity  
17 of the WWVS equal to 93,928 kW to arrive at a dismantlement cost estimate of \$7.2 million  
18 in 2019 dollars. As discussed previously, IMPA's 2017 Integrated Resource Plan assumes  
19 retirement of WWVS at the end of 2025. If the rates resulting from this rate case take effect  
20 in early 2021, this would provide a five-year period over which to collect the funds needed for  
21 dismantlement of WWVS. Therefore, I inflated this estimate to assumed 2025 dollars,  
22 resulting in a total cost of \$9.2 million in 2025 dollars, and then divided by 5 years to arrive at  
23 a proposed annual deposit of \$1,843,964 to a decommissioning reserve fund.



1 **Q46. WHY DID YOU NOT ASSUME THAT RP&L WOULD ISSUE DEBT TO COVER**  
2 **THESE DISMANTLEMENT COSTS?**

3 A. Issuance of debt would result in future rate payers paying for these costs over many more years  
4 beyond the retirement date for WWVS without any corresponding benefits to those rate payers  
5 during those additional years. This goes against the standard ratemaking principle of "cost-  
6 causer, cost payer".

7 **Q47. WHY IS THE ESTABLISHMENT OF A DECOMMISSIONING RESERVE**  
8 **NECESSARY AND PRUDENT FOR RP&L'S FINANCIAL INTEGRITY?**

9 A. The costs to decommission WWVS will be significant. In order to assure RP&L's financial  
10 integrity, it is important to begin setting aside funds for this decommissioning. Future rate  
11 payers should not be responsible for these costs, to the extent possible, since they will not  
12 receive any associated benefits.

13 **Q48. HOW DO OTHER UTILITIES ACCRUE FUNDS TO PAY FOR**  
14 **DECOMMISSIONING COSTS?**

15 A. Best practices are that utilities accrue funds to pay for decommissioning costs through their  
16 depreciation rates or through their rates charged to customers. Ideally, depreciation rates  
17 should include a component, often referred to as net salvage value, that covers such costs.

18 **Q49. HAVE RP&L'S DEPRECIATION RATES BEEN SET TO RECOVER FUNDS FOR**  
19 **DECOMMISSIONING OF WWVS OR HAVE RP&L'S CURRENT RATES BEEN**  
20 **ESTABLISHED TO RECOVER FUNDS FOR DECOMMISSIONING?**

21 A. No, RP&L has not conducted a formal depreciation study that addressed decommissioning  
22 costs or otherwise included decommissioning costs in its rates.

1 **Q50. PLEASE EXPLAIN HOW THE CASH RESERVE FUND DEPOSIT AMOUNT OF**  
2 **\$730,658 WAS DETERMINED.**

3 A. This amount was established for the purpose of building up RP&L's level of cash reserves. A  
4 common metric to measure reserves is days of cash on hand, which calculates the number of  
5 days a utility can cover its operating expenses with unrestricted cash reserves. This measure  
6 is often used as a rating criteria by bond rating agencies. Based on discussions with RP&L  
7 management, a targeted minimum level of cash reserves was set at 90 days of cash on hand.  
8 At the end of the Test Year, RP&L had \$15.1 million in unrestricted cash. O&M expenses  
9 plus taxes for the Test Year totaled \$75.2 million, or approximately \$206,000 per day.  
10 Therefore, the cash on hand was equivalent to 73 days. O&M expenses plus taxes for the  
11 Adjusted Test Year total \$76.0 million, or approximately \$208,000 per day. In order to meet  
12 the targeted 90 days cash on hand, unrestricted cash reserves would need to be increases to  
13 \$18.7 million for the Adjusted Test Year. This would require an increase of \$3.7 million over  
14 current levels of unrestricted cash. It was assumed that this increase would be accomplished  
15 over a five-year period. Thus, this level of annual deposits to cash reserve funds would be  
16 needed to achieve 90 days of cash on hand over the five-year period from 2021 through 2025.

17 **Q51. WHAT IS THE IMPORTANCE TO RP&L OF INCREASING THEIR CASH**  
18 **RESERVE LEVELS?**

19 A. Cash reserves are important financial tools to municipal utilities such as RP&L. Reserves  
20 address fluctuations in operating costs and revenues that may strain a municipal utility's cash  
21 resources. Fluctuations occur because of reasons such as seasonal variations in electricity  
22 sales, unexpected spikes in operating costs, loss of revenue due to a weather event, self-  
23 insurance, necessary changes to planned capital expenditures, etc. Reserves can be drawn

1 down at times to mitigate the need for sudden rate increases. Reserve levels are also monitored  
2 by rating agencies and levels that are too low could result in lower credit ratings for municipal  
3 utilities. Because municipal utilities do not have accesses to equity markets like investor  
4 owned utilities, reserves are an important source of capital and play an important risk  
5 management role.

6 **Q52. WHAT IS THE BASIS FOR THE MINIMUM LEVEL OF 90 DAYS OF CASH ON**  
7 **HAND?**

8 A. Based on my work with other municipal utilities, this is a reasonable minimum target level.  
9 Also, I considered credit rating criteria established by credit rating agencies for days of cash  
10 on hand such as those established by Fitch and Moody's. Current rating criteria used by these  
11 credit rating agencies are as follows:

- 12 • Strong Credit Rating: At least 120 to 150 days of cash on hand
- 13 • Mid-Range Credit Rating: At least 60 to 90 days of cash on hand
- 14 • Weaker Credit Ratings: Less than 60 to 90 days of cash on hand

15 **Q53. PLEASE EXPLAIN THE RESULTS OF THE CASH SOURCES AND USES**  
16 **ANAYSIS.**

17 A: RP&L would experience a deficit in cash of \$2,716,486 dollars during Phase I and a deficit  
18 in cash of \$50,088 in Phase II, as shown in Line 36 of Table LAT-3. It would not be until Phase  
19 III when cash generated from rates is sufficient enough to cover RP&L's cash requirements, as  
20 shown in Line 36 of Table LAT-3. Line 37 of Table LAT-3 shows the net cumulative gains  
21 (losses) in cash over the three-year phase-in period. At the end of Phase III, a cumulative net loss  
22 of cash over the three phase-in periods equal to \$204,314 is projected for RP&L. By proposing to  
23 phase-in its rate increase over three years to avoid rate shock, the Utility has elected to forego a

significant amount of revenues in the first two phases (totaling \$8.0 million), to which it would otherwise be entitled.

**Q54. DO YOU CONSIDER THE RESULTS OF THIS ANALYSIS AS BEST-CASE OR WORST CASE?**

A. Overall, I consider them to be best-case results because of the conservative assumptions that were made. For example, even though the proposed rates will be implemented over a three-year period from 2021 through 2023, the analysis assumes no increase in O&M expenses over that time period. Also, the analysis assumes no changes in kWh sales over time, even though RP&L has recently been experiencing losses in sales. RP&L's sales in 2018 were equal to 909.5 million kWh. The sales kWh for the 2019 Adjusted Test Year total 901.7 million kWh as included in the cost-of-service and rate design analysis sponsored by RP&L witness Joseph A. Mancinelli in his pre-filed direct testimony. This represents a 1% annual loss in sales kWh. For these reasons, I believe this is a conservative estimate of the possible cash deficit. The actual cash deficits that the Utility will experience during the three phase-in periods could be substantially more.

**Q55. WHAT ARE THE RESULTS OF THE CASH SOURCES AND USES ANALYSIS IF YOU INFLATE O&M EXPENSES AND ADJUST SALES KWH FOR REASONABLE LOSSES OVER THE PHASE-IN PERIODS?**

A. I performed a high-level sensitivity analysis of the sources and uses of cash assuming an increase of O&M expenses over the phase-in periods equal to 2% per year and an annual decrease in sales kWh of 1% per year. The results of this sensitivity analysis are as follows:

- Phase I: \$3.1 million net loss of cash, as compared to a \$2.7 million net loss of cash in Line 36 of Table LAT-3.

- 1 • Phase II: \$1.0 million net loss of cash, as compared to approximately zero dollars of
- 2 net loss of cash in Line 36 of Table LAT-3.
- 3 • Phase III: \$1.1 million net gain of cash as compared to \$2.6 million net gain of cash in
- 4 Line 36 of Table LAT-3.
- 5 • Phase I through III Cumulative Net Loss of Cash: Cumulative \$3.0 million net loss of
- 6 cash as compared to approximately a cumulative zero dollars net loss of cash in Line
- 7 37 of Table LAT-3.

## 8 **VI. RATE BASE ANALYSIS**

### 9 **Q56. PLEASE IDENTIFY THE COMPONENTS OF RP&L'S RATE BASE.**

10 A. RP&L's net cost rate base includes the following components:

- 11 • Net Plant In Service;
- 12 • Working Capital;
- 13 • Materials and Supplies;
- 14 • Prepayments; and
- 15 • Contributions in Aid of Construction ("CIAC").

### 16 **Q57. HAVE YOU PREPARED EXHIBITS SHOWING THE DETERMINATION OF**

17 **THE RATE BASE AS SHOWN TABLE LAT-4?**

18 A. Yes. Page 32 of Attachment LAT-2 shows the determination of the rate base for RP&L. The

19 components of the rate base are those listed above. This calculation shows the rate base using

20 actual results for the Test Year and then pro forma results for the Adjusted Test Year. A

21 summary of the information provided in Attachment LAT-2 is shown in Table LAT-4.

**Table LAT-4**  
**Rate Base Summary**

| Line No. |   | Test Year Actual Results | Adjustments | Adj. No. | Adjusted Test Year |
|----------|---|--------------------------|-------------|----------|--------------------|
| 1        | Net Plant In Service                        |                          |             |          |                    |
| 2        | Gross Plant in Service                      | \$191,504,954            | \$2,272,617 | (1)      | \$193,777,571      |
| 3        | Accumulated Depreciation                    | -135,403,172             | -2,717,077  | (2)      | -138,120,249       |
| 4        | Subtotal Net Plant In Service (Lines 2 + 3) | \$56,101,782             | -\$444,460  |          | \$55,657,321       |
| 5        | Working Capital                             | \$9,397,980              | \$104,362   | (3)      | \$9,502,343        |
| 6        | Materials and Supplies                      | 2,206,209                | -           |          | 2,206,209          |
| 7        | Prepayments                                 | 319,362                  | -           |          | 319,362            |
| 8        | Subtotal Rate Base (Lines 4 + 5 + 6 + 7)    | \$68,025,333             | -\$340,098  |          | \$67,685,235       |
| 9        | Contributions in Aid of Construction        | -\$1,970,710             | -           |          | -\$1,970,710       |
| 10       | Rate Base (Line 8 + Line 9)                 | \$66,054,623             | -\$340,098  |          | \$65,714,525       |

**Q58. PLEASE IDENTIFY WHAT IS INCLUDED IN ADJUSTMENT NO. 1 MADE TO GROSS PLANT IN SERVICE EQUAL TO \$2,272,617.**

A. The gross plant in service shown in Table LAT-4 for the unadjusted Test Year is equal to \$191,504,954, which is the 13-month average of RP&L plant in service for the time period ending September 30, 2019. The adjustment of \$2,272,617 is equal to the difference in the projected 13-month average plant for the time period ending September 30, 2020, and the actual 13-month average of \$191,504,954 for the time period ending September 30, 2019. During the period ending September 30, 2020, plant additions were assumed to be equal to \$3,564,545 and plant retirements were assumed to be equal to \$463,028. The plant additions are equal to 25% of budgeted plant additions for fiscal year 2019 and 75% of budgeted plant additions for fiscal year 2020. The plant retirements were estimated based on historical averages.

**Q59. PLEASE IDENTIFY WHAT IS INCLUDED IN ADJUSTMENT NO. 2 MADE TO  
ACCUMULATED DEPRECIATION EQUAL TO \$2,717,077.**

A. The average accumulated depreciation shown in Table LAT-4 for the unadjusted Test Year is equal to \$135,403,172, which is the 13-month average of RP&L accumulated depreciation for the time period ending September 30, 2019. The adjustment of \$2,717,077 is equal to the difference in the projected 13-month average accumulated depreciation for the time period ending September 30, 2020, and the actual 13-month average of \$135,403,172 for the time period ending September 30, 2019. During the period ending September 30, 2020, normalized depreciation expense was assumed to be equal to \$4,055,996 and plant retirement were assumed to be equal to \$463,028. The approach used to calculate the normalized depreciation expense is addressed in more detail below. As mentioned above, the plant retirements were estimated based on historic averages.

**Q60. PLEASE EXPLAIN HOW THE WORKING CAPITAL ADJUSTMENT WAS  
DETERMINED FOR ADJUSTMENT NO. 3.**

A. Working capital was determined using the standard 1/8<sup>th</sup> rule.<sup>5</sup> For the actual Test Year, O&M expenses and taxes total \$75,183,843. One-eighth of this amount is \$9,397,980. For the Adjusted Test year, O&M expenses total \$76,018,740. One-eighth of this amounts is \$9,502,343. The difference is \$104,362.

**Q61. WHAT ARE THE OTHER COMPONENTS OF THE RATE BASE?**

A. The other components include materials and supplies, prepayments, and CIAC. Since it is not an appropriate component of determining the Utility's return, CIAC was deducted from the

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<sup>5</sup> Working capital is estimated using one-eighth of a year's worth of annual operating and maintenance expenses, or 45 days.

1 Subtotal Rate Base on Line 9 of Table LAT-4. No normalizing adjustments were made to  
2 these components.

3 **VII. ENERGY COST ADJUSTMENT CALCULATION**

4 **Q62. PLEASE EXPLAIN RP&L'S ECA TRACKER.**

5 A. Because RP&L purchases its power exclusively from IMPA, the ECA was originally  
6 established by the Commission in Cause No. 36835-S1 in 1983 as a mechanism by which  
7 RP&L and other IMPA members could obtain Commission approval of periodic energy cost  
8 adjustment and power tracking procedures that would allow RP&L to track to its retail  
9 customers' increases or decreases in the cost of power and energy RP&L purchases from IMPA  
10 outside of a base rate case. RP&L makes quarterly ECA filings with the IURC.

11 **Q63. WHEN WAS THIS PROCESS ESTABLISHED?**

12 A. The use of a tracking mechanism to recover wholesale energy costs for Commission regulated  
13 members of IMPA was first approved on January 11, 1983 in Cause No. 36835-S1, and  
14 subsequently revised in orders in subdockets S2 (Final Order issued May 2, 1984) and S3  
15 (Final Order issued December 13, 1989)<sup>6</sup> ("1989 ECA Order"). These procedures allow  
16 Richmond to appropriately reconcile any over or under collection of wholesale energy costs  
17 on a quarterly basis. As approved in the 1989 ECA Order, RP&L submits to the Commission

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<sup>6</sup> *In the Matter of the Indiana Municipal Power Agency and the Indiana Cities and Towns, Members Thereof, to Modify, Simplify and Make More Equitable Certain Tracking Procedures Heretofore Authorized By This Commission to Track Increases or Decreases in the Cost of Purchased Power and Energy by Such Members From the Indiana Municipal Power Agency*, IURC Cause No. 36835-S3, December 13, 1989. Please note that the Final Order in this Cause appears to be omitted from Westlaw's repository of Commission orders and hence no Westlaw citation is available. For ease of reference, it is included as Attachment LAT-3.



1 ECA forms that calculate the per unit changes between RP&L's current wholesale power costs  
2 and the wholesale power costs reflected in RP&L's current rates, and then RP&L multiplies  
3 those changes by the next quarter's estimated billing determinants.<sup>7</sup> Further, to eliminate the  
4 possibility of overcollection or undercollection, the form includes a base rate change  
5 reconciliation procedure under which each quarter's estimation of the billing determinants used  
6 by RP&L to bill its ratepayers is reconciled with the actual billing determinants used by IMPA  
7 to bill RP&L. The form requires RP&L to take into consideration IMPA's base rates, together  
8 with IMPA's energy cost adjustment factor, in determining a quarterly variance between what  
9 RP&L billed its ratepayers and what IMPA billed RP&L, resulting in a dollar for dollar flow  
10 through of IMPA's base rates and energy cost adjustment charges. The form also requires  
11 RP&L to report current estimates of RP&L's generating costs and payments from IMPA on a  
12 quarterly basis.<sup>8</sup>

13 **Q64. IN TERMS OF CALCULATING THE ECA RATES BASED ON DEMAND**  
14 **CHARGES VERSUS ENERGY CHARGES, HOW ARE RP&L'S ECA RATES**  
15 **PRESENTLY CALCULATED AND ASSESSED AMONG THE CUSTOMER**  
16 **CLASSES?**

17 A. For all categories of classes except the category including Rate Schedules LPS, LPS-COIN,  
18 IS, and IS-COIN, ECA rates are assessed on a dollar per kWh (or energy) basis. For Rate  
19 Schedules LPS, LPS-COIN, IS, and IS-COIN, all are assessed the same per kWh ECA energy  
20 rate. Rate Schedules LPS and IS are also both assessed the same dollar per kVA (or demand)  
21 rates and Rate Schedules LPS-COIN and IS-COIN are also both assessed the same dollar per

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<sup>7</sup> *Id.* at \*6-\*7.

<sup>8</sup> *Id.* at \*8.

1 coincident kW rates. This is consistent with how demand charges in their base rates are  
2 assessed. In summary, the basis on which ECA rates are currently assessed by category of rate  
3 schedule is summarized below:

- 4 • Residential Service (Rate Schedule R) – \$/kWh;
- 5 • Commercial Lighting Service (Rate Schedule CL) - \$/kWh;
- 6 • General Power (Rate Schedule GPS), General Electric Heating (Rate Schedule GEH),  
7 and Electric Heating Schools Services (Rate Schedule EHS) - \$/kWh
- 8 • Large Power (Rate Schedule LPS), Large Power Optional Coincident Peak (Rate  
9 Schedule LPS-COIN), Industrial (Rate Schedule IP), and Industrial Optional  
10 Coincident Peak Services (Rate Schedule IS-COIN) - \$/kWh, \$/kVA, and \$/kW  
11 Coincident
- 12 • Outdoor Lighting (Rate Schedule OL), Municipal Street Lighting (Rate Schedule M),  
13 and Streetlight Services (Rate Schedule N) - \$/kWh

14 **Q65. AT A HIGH LEVEL, PLEASE DESCRIBE THE STEPS FOLLOWED TO**  
15 **CALCULATE THE ECA RATES.**

16 A. The ECA calculations first determine incremental changes in IMPA power costs to RP&L  
17 between the quarter when the ECA rates will be in effect and those from RP&L's last rate case.  
18 These incremental costs are then allocated to the above categories of customer classes based  
19 on the cost-of-service allocators from the last rate study, as adjusted for changes in load since  
20 the last rate study. Next, the amount of historic under-recovery or over-recovery for each of  
21 the categories of customer classes are then added or subtracted, respectively, to the incremental  
22 power costs. The results for each of the categories of customer classes are then divided by the  
23 appropriate billing determinants to arrive at the ECA rates identified in the quarterly filings.

**Q66. HOW ARE THE HISTORIC UNDER OR OVER RECOVERY AMOUNTS DETERMINED?**

A. For the historic period, the incremental IMPA power costs to RP&L as compared to those in RP&L's last rate case are first determined. These incremental costs are then allocated to the above categories of customer classes based on the cost-of-service allocators from the last rate study, as adjusted for changes in load since the last rate study. These amounts are then compared to actual revenues from ECA rates during the historic period for each of the customer class categories. The net of these amounts equals the historic over or under recovery.

**Q67. ARE YOU PROPOSING ANY UPDATES TO RP&L'S CURRENT ECA MODEL?**

A. Yes. My first recommendation is that the ECA rates for Rate Schedules GP and GEH include demand rates. Current base rates for Rate Schedules GP and GEH include customer and energy charges. RP&L witness Joseph A. Mancinelli recommends that base rates for Rate Schedules GP and GEH rates established as part of this proceeding also include demand rates on a per kW basis to more fully insure recovery of fixed costs through base rates despite fluctuations in sales among other reasons. RP&L witness Joseph A. Mancinelli also recommends that the current LPS, IS, LPS-COIN, and IP-COIN classes be further divided based on service voltage levels. Therefore, my second recommendation is that ECA rates be developed separately for the further divided LPS, IS, LPS-COIN, and IP-COIN rate schedules. The difference in load characteristics of the LPS and IS non-coincident versus coincident rate schedules dictate the development of different ECA rates to better reflect "cost causer, cost payer". Finally, I recommend that ECA rates be identified for the proposed customer classes that RP&L witness Joseph A. Mancinelli identifies as not currently having any current customers.

**Q68. PLEASE IDENTIFY HOW RP&L WITNESS JOSEPH A. MANCINELLI PROPOSES TO FURTHER DIVIDE THE LPS, IS, LPS-COIN, AND IS-COIN CLASSES FOR RATE-MAKING PURPOSES.**

A. Mr. Mancinelli recommends that the LPS class be split into the LPS Secondary ("LPSS") and LPS Primary ("LPSP") rate schedules. He further recommends that the IS class be split into the IS Secondary ("ISS") and IS Primary ("ISP") classes and the LPS-COIN class be split into the LPS-COIN Secondary ("LPSS-COIN") and the LPS-COIN Primary ("LPSP-COIN") rate schedules. In addition, he recommends that the IS-COIN class be split into the IS-COIN Secondary ("ISS-COIN") and the IS-COIN Primary ("ISP-COIN") rate schedules. Finally, Mr. Mancinelli proposes separate rates for the Transmission Service ("TS") and Transmission Service Coincident ("TS COIN") rate schedules.

**Q69. WHICH OF THOSE SCHEDULES CURRENTLY HAVE NO CUSTOMERS?**

A. The proposed classes currently without any customers include the LPSP, ISS, ISS-COIN, TS, and TS-COIN classes.

**Q70. GIVEN THESE RECOMMENDED CHANGES, PLEASE IDENTIFY BY CATEGORY OF RATE SCHEDULES THE TYPES OF ECA RATES THAT WOULD APPLY.**

A. I propose that the ECA calculations in future filings determine ECA rates for the following groups of rate schedules on the basis indicated:

- Residential Service (Rate Schedule R) – \$/kWh;
- Commercial Lighting Service (Rate Schedule CL) - \$/kWh;
- Electric Heating Schools Services (Rate Schedule EHS) - \$/kWh

- 1       • General Power Service and General Electric Heating (Rate Schedules GPS and GEH)  
2       - same \$/kW and \$/kWh
- 3       • Large Power, Industrial, and Transmission Service – same \$/kVA and \$/kWh rates for  
4       following rate schedules
  - 5       ○ LPSS
  - 6       ○ LPSP
  - 7       ○ ISS
  - 8       ○ ISP
  - 9       ○ TS
- 10      • Large Power, Industrial, and Transmission Service Coincident – same \$/kW and \$/kWh  
11      rates for the following rate schedules
  - 12      ○ LPSS-COIN
  - 13      ○ LPSP-COIN
  - 14      ○ ISS-COIN
  - 15      ○ ISP-COIN
  - 16      ○ TS-COIN
- 17      • Outdoor Lighting, Municipal Street Lighting, and Streetlight Services (Rate Schedule  
18      LS) - \$/kWh

19   **Q71. HAVE YOU DEVELOPED A RECOMMENDED ECA MODEL THAT**  
20   **INCORPORATES THESE CHANGES?**

21   A. Yes, the updated model is provided in Attachment LAT-4.

22   **Q72. GIVEN THAT YOU ARE PROPOSING TO EXPAND THE NUMBER OF RATE**  
23   **CATEGORIES FOR WHICH ECA RATES ARE DEVELOPED, DOES THIS RESULT**

**IN SOME UNIQUE CIRCUMSTANCES THAT MUST BE TAKEN INTO ACCOUNT  
DURING THE TRANSITION?**

A. Yes. As discussed previously, the historic amount of over-recovery or under-recovery of incremental power costs by category of rate classes is an important component of the calculation of ECA rates. Essentially, the current ECA model calculates that amount for each of the categories of customer classes. Going forward, it will be necessary to split out those amounts of over-recovery and under-recovery between the additional categories of customer classes. I recommend this be done based on the cost-of-service allocators from the last rate study, as adjusted for changes in load since the last rate study.

**VIII. SUMMARY AND CONCLUSIONS**

**Q73. PLEASE PROVIDE A SUMMARY OF YOUR RECOMMENDATIONS.**

A. My first recommendation is that the IURC approve an average increase of \$7.7 million to RP&L's current rates, which is equivalent to a 9.6% increase, as implemented over time per the recommendations made by RP&L witness Joseph A. Mancinelli in his pre-filed direct testimony. My second recommendation is that the IURC approve the changes identified above to the calculation of future ECA rates for RP&L.

**Q74. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

A. Yes.

**VERIFICATION**

I affirm under the penalties of perjury that the foregoing prefled verified direct testimony is true to the best of my knowledge, information and belief as of the date here filed.

  
Laurie A. Tomczyk



**Laurie A. Tomczyk, PE**  
Executive Consultant, Energy Practice  
[ltomczyk@newgenstrategies.net](mailto:ltomczyk@newgenstrategies.net)

Ms. Tomczyk has over 30 years of experience in providing management consulting services to clients involved in the electric power, water, and solid waste management industries. She specializes in electric utility revenue requirement analyses, cost of service and rate design studies, financial projections, expert witness services, and other engineering and economic analyses. Her rate-related projects have included studies to develop retail electric, retail water, transmission, ancillary service, standby, and special contract rates. She also has experience in net energy metering, decoupling, and opt-out programs.

Ms. Tomczyk has provided expert witness testimony on revenue requirement cost of service issues before public utility commissions, and she has provided other types of cost of service and rate-related litigation support. She has been an instructor on behalf of Electric Utility Consultants, Inc. for courses on cost of service concepts and techniques and rate design for electric utilities.

Ms. Tomczyk joined NewGen Strategies & Solutions as an Executive Consultant in 2014. Prior to joining the firm, she provided utility consulting services while employed at R. W. Beck, Inc. and its successor firm, SAIC, for 25 years.

## EDUCATION

- Bachelor of Science in Mechanical Engineering, University of Nebraska

## PROFESSIONAL REGISTRATIONS/CERTIFICATIONS

- Registered Professional Engineer (PE), Mechanical, Colorado

## KEY EXPERTISE

- Revenue Requirements
- Cost of Service and Rate Design
- Expert Witness and Litigation Support
- Financial Projections
- Engineering/Economic Analyses
- Depreciation Studies

## RELEVANT EXPERIENCE

### Revenue Requirement, Cost of Service, and Rate Design

Ms. Tomczyk leads and participates in retail revenue requirement, cost of service, and rate design studies for electric utilities. The services she provides include development of historical and projected revenue requirements and the development of detailed cost of service and rate design models. Ms. Tomczyk has utilized numerous cost allocation methods and compared the revenue requirements under the various cost of service methods in order to evaluate the most appropriate cost of service methodologies for specific clients.

Additionally, Ms. Tomczyk has worked on diverse ratemaking issues such as standby service rates, net energy metering rates, wheeling rates, feed-in tariffs, and cost of service levels. She has used projected test year analyses to assess revenue requirements; assessed the cost of service changes for multiple customer classes; developed new rates for customer classes based on pre-defined overall percentage rate increases; and determined whether a return on rate base or Times Interest Earned Ratio should be used for ratemaking purposes. A sample listing of Ms. Tomczyk's cost of service and rate design clients by service offering is shown below.



## Laurie A. Tomczyk, PE

Executive Consultant, Energy Practice

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### Electric Revenue Requirement, Unbundled Cost of Service Analysis, and Rate Design Studies

- United Power Electric Cooperative, Colorado
- Golden Valley Electric Cooperative, Alaska
- Homer Electric Association, Alaska
- Bryan Texas Utilities, Texas
- Brownsville Public Utilities Board, Texas
- Kaua'i Island Utility Cooperative, Hawai'i
- BC Hydro, British Colombia, Canada
- Lafayette Utilities System, Louisiana
- Cleveland Public Power, Ohio
- CPS Energy, Texas
- Tri-State Generation & Transmission Association, Inc., Colorado
- Austin Energy, Texas
- Farmington Electric Utility System, New Mexico
- Water and Electric Board, Oregon
- Garland Power & Light, Texas
- United Power Electric Cooperative, Colorado
- Guam Power Authority, Guam
- U.S. Army, California, Georgia, New York, and Virginia
- Fayetteville Public Works Commission, North Carolina

### Competitive Retail Rate Assessments

- Garland Power and Light, Texas
- Brownsville Public Utilities Board, Texas

### Electric Transmission and Ancillary Service Rates

- Golden Valley Electric Cooperative, Alaska
- Homer Electric Association, Alaska
- Lubbock Power & Light, Texas
- Brownsville Public Utilities Board, Texas
- Greenville Electric Utility System, Texas

### Net Energy Metering and Standby Rates

- Kaua'i Island Utility Cooperative, Hawai'i
- Homer Electric Association, Alaska
- Golden Valley Electric Cooperative, Alaska
- Madisonville Municipal Utilities, Kentucky

### Electric Special Contract Rates

- Homer Electric Association, Alaska
- Alaska Golden Valley Electric Cooperative, Alaska

### Electric Decoupling Programs

- Kaua'i Island Utility Cooperative, Hawai'i
- Guam Power Authority, Guam

### Opt-Out Program Associated with Advanced Electric Metering Infrastructure Project

- Kaua'i Island Utility Cooperative, Hawai'i

### Expert Witness and Litigation Support

Ms. Tomczyk offers expert testimony regarding cost of service, rate design and ratemaking issues before local and state regulatory bodies and courts. She has developed revenue requirements, rate base, cost of service analysis, and rate design and associated testimony to be filed with state commissions; including design of retail, transmission, and ancillary services rates. She has developed a standby rate report filed with the state commission as part of the standby rate service tariff filing. She has provided written testimony and other litigation support on behalf of clients pertaining to their revenue requirements, cost of service studies, and equity management plans.

**Laurie A. Tomczyk, PE**  
**Director, Energy Practice**

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Additionally, Ms. Tomczyk has developed comments provided on behalf of a customer associations related to a state commission's investigation to analyze the strengths and weaknesses of marginal cost of service studies, embedded cost of service studies, the reconciliation process, and how this impacts rate classes. She has also reviewed wholesale energy provider's unbundled financial statements, calculation of equipment, projected wholesale customer patronage capital accruals, and estimated rate impacts associated with the wholesale utility's proposed construction of a new generation plant. Ms. Tomczyk has provided testimony and other types of litigation support for the following clients:

- Golden Valley Electric Cooperative, Alaska
- Homer Electric Association, Alaska
- Guam Power Authority, Guam
- B.C. Hydro, British Columbia
- SABIC Innovative Plastics, Indiana
- Kaua'i Island Utility Cooperative, Hawai'i
- Nevada Resorts Association, Nevada
- Tri-State Generation & Transmission Association, Inc., Colorado
- U.S. Army, Texas and New York

## **Financial Projections**

Ms. Tomczyk is responsible for the development of financial and economic analyses for utility clients. Many of these analyses have been presented before regulatory commissions in support of general rate case applications, and in particular in support of the revenue requirements in the applications. She has also developed equity management plans for electric cooperatives, pro forma and other financial analyses. Her financial project clients include:

- Golden Valley Electric Cooperative, Alaska
- Guam Power Authority, Guam
- Brownsville Public Utilities Board, Texas
- Kaua'i Island Utility Cooperative, Hawai'i
- City of Indianapolis, Indiana
- Lafayette Utilities System, Louisiana
- Georgetown Municipal Water and Server Service, Kentucky
- St. Joseph Power & Light, Missouri
- Homer Electric Association, Alaska
- CPS Energy, Texas

## **Depreciation**

Ms. Tomczyk performs analyses on depreciation studies for municipal and cooperative utility clients. She developed a replacement planning model using survivor curve methodology to estimate the level of future replacement costs for electric utility systems at nine military bases that are operated and maintained under contract by City Light & Power, Inc. She has also been involved in the development of depreciation studies for the Kauai Island Utility Cooperative, Navajo Tribal Utility Authority, and Los Angeles Department of Water and Power. Ms. Tomczyk is a member of the Society of Depreciation Professionals (SDP) and has completed training courses offered by SDP. These training classes included topics such as data requirements and collection, unit versus group accounting, depreciation models, actuarial and simulation life analyses, salvage and cost of removal analyses, and technology forecasting. She is working towards becoming a Certified Depreciation Professional through SDP.

## **WORKSHOPS AND PRESENTATIONS**

Ms. Tomczyk has served as an instructor on behalf of Electric Utility Consultants, Inc. (EUCI) for the following courses:

- Introduction to Cost of Service Concepts and Techniques for Electric Utilities
- Introduction to Rate Design for Electric Utilities

She has also made the following presentations at the Michigan Municipal Electric Association Annual Conference:

**Laurie A. Tomczyk, PE**  
Executive Consultant, Energy Practice

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- Standby Rates for Distributed Generation
- Using AMI Data for Cost-of-Service and Rate Design Analyses, Resource Planning, and Financial Planning
- Balancing Aging Infrastructure, Rates, and Residential Demand

**Record of Testimony Submitted by**  
**Laurie A. Tomczyk**

| Utility                            | Proceeding                 | Subject of Testimony  | Before                                | Client  | Date                                     |
|------------------------------------|----------------------------|---|---------------------------------------|---|--|
| Vectren Energy of Indiana          | Docket No. 43354 – MCRA 21 | MISO Cost and Revenue Adjustment Tracker  | Indiana Utility Regulatory Commission | SABIC Innovative Plastics Mount Vernon, LLC                         | 12/2017                                  |
| El Paso Electric Company           | Docket No. 46831           | Cost of Service and Rate Design Studies   | Public Utility Commission of Texas    | U.S. Department of Defense and all other Federal Executive Agencies | 06/2017<br>07/2017                       |
| Golden Valley Electric Association | Docket No. U-17-007        | Revenue Requirement and Cost of Service Study and Transmission and Ancillary Service Rates Development                    | Regulatory Commission of Alaska       | Golden Valley Electric Association                                  | 12/2016<br>08/2017                       |
| Homer Electric Association         | Docket No. U-15-141        | Revenue Requirement and Cost of Service Study and Transmission and Ancillary Service Rates Development                    | Regulatory Commission of Alaska       | Homer Electric Association  | 10/2015<br>09/2016                       |
| Homer Electric Association         | Docket No. U-13-203        | Revenue Requirement and Cost of Service Study and Transmission and Ancillary Service Rates Development                    | Regulatory Commission of Alaska       | Homer Electric Association  | 05/2014<br>06/2014<br>09/2014<br>02/2015 |
| Homer Electric Association         | Docket No. U-10-97         | Revenue Requirement and Cost of Service Study   | Regulatory Commission of Alaska       | Homer Electric Association  | 10/2010                                  |
| Chugach Electric Association       | Docket No. U-09-80         | Revenue Requirement and Cost of Service Study   | Regulatory Commission of Alaska       | Homer Electric Association  | 2/2010                                   |
| Kaua'i Island Utility Cooperative  | Docket No. 2009-0050       | Cost of Service Study and Standby Rate Development  | Hawai'i Public Utilities Commission   | Kaua'i Island Utility Cooperative                                   | 6/2009                                   |
| Golden Valley Electric Association | Docket No. U-08-139        | Cost of Service Study and Transmission and Ancillary Service Rates Development  | Regulatory Commission of Alaska       | Golden Valley Electric Association                                  | 9/2008                                   |
| Chugach Electric Association       | Docket No. U-06-134        | Unbundled Financial Statements, Calculation of Equity, Patronage Capital Accruals, and Rate Impacts Due to New Generation | Regulatory Commission of Alaska       | Homer Electric Association  | 3/2007                                   |

**RP&L Revenue Requirement Calculation  
Attachment LAT-2  
Direct Testimony of Laurie A. Tomczyk**

**Attachment LAT-2**  
**Page 1 of 45**

[illegible]PDF Page 54 of 128

Direct Testimony of L. Tomczyk  
Petitioner's Exhibit 2

Test Year Revenue Requirement Adjustments Summary LAT WP-1

| A                 |       | B   | C | D                  |                | E            | G                  | H  | I   | J  | K   | L  | M  | N  | O   | P   | Q   | R   | S  | T  | U   | V  | W  | X    |
|-------------------|-------|---|---|--------------------|----------------|--------------|--------------------|--|---|--|---|--|--|--|---|---|---|---|--|--|---|--|--|------|
| Line No. Acct No. |       | Description                                       |   | Source             | Test Year      | Adjustments  | Adjusted Test Year | Adjustment<br>No. 1<br>Change In<br>Purchased<br>Power Costs | Adjustment<br>No. 2<br>Change In<br>Labor Costs | Adjustment<br>No. 3<br>Removal of<br>Advertising<br>Expenses | Adjustment<br>No. 4<br>Uncollectibles<br>Adjustment | Adjustment<br>No. 5<br>Amortized<br>Rate Case<br>Expense | Adjustment<br>No. 6<br>Change In<br>Employee<br>Benefits | Adjustment<br>No. 7<br>Change In<br>Depreciation<br>Expenses | Adjustment<br>No. 8<br>Amortization of<br>Environmental<br>Remediation<br>Liability | Adjustment<br>No. 9<br>Change In<br>FICA-<br>Related<br>Taxes | Adjustment<br>No. 10<br>Utility<br>Receipts Tax<br>Adjustment | Adjustment<br>No. 11<br>Removal of<br>Interest<br>Income on<br>Bond Reserve | Adjustment<br>No. 12<br>Removal of<br>Parallax<br>Interest<br>Income | Adjustment<br>No. 13<br>Removal of<br>Environmental<br>Remediation<br>Expenses | Adjustment<br>No. 14<br>Change In<br>Return on<br>Rate Base | Adjustment<br>No. 15<br>Change In<br>Revenues<br>from Large<br>Cust Load<br>Increase | Adjustment<br>No. 16<br>Change In<br>Revenues from<br>Moving Large<br>Cust to<br>Different Class |      |
| 83                | 92530 | Damage-Damage Se                                  |   | WP 8, WP 22        | 1,847          | -            | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 84                | 92600 | Empl Benefits-General                             |   | WP 8, WP 22        | 26,785         | 3,087        | 29,872             | -  | -   | -  | -   | -  | 3,087  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 85                | 92610 | Empl Benefits-Pension                             |   | WP 8, WP 22        | 2,192,884      | (18,373)     | 2,174,511          | -  | -   | -  | -   | -  | (18,373)   | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 86                | 92615 | Employee Benefit - Defined Contribution Plan      |   | WP 8, WP 22        | 79,585         | 23,244       | 102,828            | -  | -   | -  | -   | -  | 23,244   | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 87                | 92620 | Empl Benefits-Health Ins                          |   | WP 8, WP 22        | 1,403,026      | 121,592      | 1,524,618          | -  | -   | -  | -   | -  | 121,592  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 88                | 92621 | Empl Benefits-Life Ins                            |   | WP 8, WP 22        | 11,468         | 596          | 12,064             | -  | -   | -  | -   | -  | 596  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 89                | 92622 | Empl Benefits-Disability Ins                      |   | WP 8, WP 22        | 14,161         | 1,924        | 16,085             | -  | -   | -  | -   | -  | 1,924  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 90                | 92630 | Empl Benefits-Recreation                          |   | WP 8, WP 22        | -              | -            | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 91                | 92640 | Empl Benefits-Educate Assist                      |   | WP 8, WP 22        | 1,908          | 6,134        | 8,042              | -  | -   | -  | -   | -  | 6,134  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 92                | 92695 | Vacation Earned                                   |   | WP 8, WP 22        | 34,628         | (25,436)     | 9,191              | -  | -   | -  | -   | -  | (25,436)   | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 93                | 92800 | Rag Commission Exp-General                        |   | WP 8, WP 22        | -              | -            | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 94                | 92820 | State Board Of Acts Exp                           |   | WP 8, WP 22        | 15,229         | -            | 15,229             | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 95                | 93020 | Misc General Exp                                  |   | WP 8, WP 22        | 1,078          | -            | 1,078              | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 96                | 93021 | Memberships And Dues                              |   | WP 8, WP 22        | 11,011         | -            | 11,011             | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 97                | 93100 | Rent  |   | WP 8, WP 22        | -              | -            | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 98                | 93200 | Maint Of Gen Pl-Structures                        |   | WP 8, WP 22        | 298,491        | (768)        | 297,724            | -  | -   | (768)  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 99                | 93210 | Maint Of Gen Pl-Office Furn                       |   | WP 8, WP 22        | 23,348         | -            | 23,348             | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 100               | 93220 | Maint Of Gen Pl-Misc                              |   | WP 8, WP 22        | 2,918          | -            | 2,918              | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 101               | 93230 | Maint Of Gen Pl-Communicat                        |   | WP 8, WP 22        | 14,601         | -            | 14,601             | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 102               | 93235 | Maint Of Gen Pl-Electrical                        |   | WP 8, WP 22        | -              | -            | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 103               | 93240 | Maint Of Gen Pl-Corn Soft                         |   | WP 8, WP 22        | 88,019         | -            | 88,019             | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 104               | 93245 | Maint Of Gen Pl-Corn Hard                         |   | WP 8, WP 22        | 2,157          | -            | 2,157              | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 105               | 93300 | Transportation Expenses                           |   | WP 8, WP 22        | 75,484         | 5,920        | 81,404             | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 106               |       | Total Administrative and General                  |   |                    | \$ 6,803,207   | \$ 123,070   | \$ 6,926,277       | \$ -   | \$ (39,698)                                     | \$ -   | \$ -  | \$ 50,000  | \$ 112,768   | \$ -   | \$ -  | \$ -  | \$ -  | \$ -  | \$ -   | \$ -   | \$ -  | \$ -   | \$ -   | \$ - |
| 107               |       | Total Operation & Maintenance Expenses            |   |                    | \$ 75,183,843  | \$ 834,897   | \$ 76,018,740      | \$ 405,349   | \$ 254,123                                      | \$ (17,117)  | \$ 29,774   | \$ 50,000  | \$ 112,768   | \$ -   | \$ -  | \$ -  | \$ -  | \$ -  | \$ -   | \$ -   | \$ -  | \$ -   | \$ -   | \$ - |
|                   |       | Taxes Excluding Income Taxes                      |   |                    |                |              |                    |  |   |  |   |  |  |  |   |   |   |   |  |  |   |  |  |      |
| 108               | 40811 | Tax Expense - Utility Receipts Tax                |   | WP 5, WP 22        | \$ 1,108,142   | \$ 110,231   | \$ 1,218,373       | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | \$ 110,231  | -  | -  | -   | -  | -  | -    |
| 109               | 40814 | Tax Exp-Print To City In Lieu                     |   | WP 22              | 777,792        | -            | 777,792            | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 110               | 40812 | Tax Exp-Fica                                      |   | WP 8, WP 22        | 53,389         | -            | 502,078            | -  | -   | -  | -   | -  | -  | -  | -   | -   | 53,389  | -   | -  | -  | -   | -  | -  | -    |
| 111               |       | Total Taxes                                       |   |                    | \$ 2,334,624   | \$ 163,620   | \$ 2,498,244       | \$ -   | \$ -  | \$ -   | \$ -  | \$ -   | \$ -   | \$ -   | \$ -  | \$ -  | \$ 53,389   | \$ 110,231  | \$ -   | \$ -   | \$ -  | \$ -   | \$ -   | \$ - |
|                   |       | Depreciation & Amortization Expenses              |   |                    |                |              |                    |  |   |  |   |  |  |  |   |   |   |   |  |  |   |  |  |      |
| 112               | 40300 | Generation  |   | WP 14, WP 22       | \$ 900,064     | \$ (487,475) | \$ 412,589         | -  | -   | -  | -   | -  | -  | \$ (487,475)   | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 113               | 40300 | Transmission                                      |   | WP 14, WP 22       | 824,559        | 2,973        | 827,531            | -  | -   | -  | -   | -  | -  | 2,973  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 114               | 40300 | Distribution                                      |   | WP 14, WP 22       | 2,000,586      | 18,830       | 2,019,416          | -  | -   | -  | -   | -  | -  | 18,830   | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 115               | 40300 | General Plant                                     |   | WP 14, WP 22       | 859,636        | (63,176)     | 796,460            | -  | -   | -  | -   | -  | -  | (63,176)   | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 116               |       | Amortization of White Water Remediation Liability |   | WP 5, WP 22        | -              | 2,680,000    | 2,680,000          | -  | -   | -  | -   | -  | -  | -  | 2,680,000   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 117               |       | Total Depreciation and Amortization Expenses      |   |                    | \$ 4,584,845   | \$ 2,151,151 | \$ 6,735,996       | \$ -   | \$ -  | \$ -   | \$ -  | \$ -   | \$ -   | \$ (528,849)   | \$ 2,680,000  | \$ -  | \$ -  | \$ -  | \$ -   | \$ -   | \$ -  | \$ -   | \$ -   | \$ - |
| 118               |       | TOTAL OPERATING EXPENSES                          |   |                    | \$ 82,103,312  | \$ 3,149,668 | \$ 85,252,980      | \$ 405,349   | \$ 254,123                                      | \$ (17,117)  | \$ 29,774   | \$ 50,000  | \$ 112,768   | \$ (528,849)   | \$ 2,680,000  | \$ 53,389   | \$ 110,231  | \$ -  | \$ -   | \$ -   | \$ -  | \$ -   | \$ -   | \$ - |
|                   |       | Other Operating Revenues                          |   |                    |                |              |                    |  |   |  |   |  |  |  |   |   |   |   |  |  |   |  |  |      |
| 119               | 45000 | Penalties For Late Prints                         |   | WP 22              | \$ (558,091)   | \$ -         | \$ (558,091)       | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 120               | 45110 | Misc Rev - City Of Richmond                       |   | WP 22              | (927)          | -            | (927)              | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 121               | 45120 | Misc Revenues - General                           |   | WP 22              | (256,197)      | -            | (256,197)          | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 122               | 45121 | Connect Or Recon Charges                          |   | WP 22              | (50,855)       | -            | (50,855)           | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 123               | 45122 | Temporary Service Charges                         |   | WP 22              | (570)          | -            | (570)              | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 124               | 45123 | Dishonored Check Charges                          |   | WP 22              | (6,120)        | -            | (6,120)            | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 125               | 45130 | Misc Service Revenue - MPRA                       |   | WP 22              | (19,091)       | -            | (19,091)           | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 126               | 45410 | Rent From Elec Prop - Land                        |   | WP 22              | -              | -            | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 127               | 45420 | Rent From Joint Use Of Pole                       |   | WP 22              | (139,159)      | -            | (139,159)          | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 128               | 45640 | Misc Revenues                                     |   | WP 22              | (263)          | -            | (263)              | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
|                   |       | Total Other Operating Revenues                    |   |                    | \$ (1,031,274) | \$ -         | \$ (1,031,274)     | \$ -   | \$ -  | \$ -   | \$ -  | \$ -   | \$ -   | \$ -   | \$ -  | \$ -  | \$ -  | \$ -  | \$ -   | \$ -   | \$ -  | \$ -   | \$ -   | \$ - |
|                   |       | Non-Operating Revenues                            |   |                    |                |              |                    |  |   |  |   |  |  |  |   |   |   |   |  |  |   |  |  |      |
| 129               | 41400 | Gains (Losses) From Dispose                       |   | WP 22              | \$ -           | \$ -         | \$ -               | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 130               | 41510 | Contract Income-Billing                           |   | WP 22              | (7,942)        | -            | (7,942)            | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 131               | 41900 | Interest Income- Checking Acct                    |   | WP 22              | (7,039)        | -            | (7,039)            | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 132               | 41915 | Int & Dividend Income                             |   | WP 22              | -              | -            | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 133               | 41920 | Int Income-Cash Reserve                           |   | WP 22              | -              | -            | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 134               | 41940 | Int Income-Bond Reserve                           |   | WP 5, WP 22        | (445)          | 445          | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | 445   | -  | -  | -   | -  | -  | -    |
| 135               | 41950 | Int Income-Depreciation                           |   | WP 22              | (80,897)       | -            | (80,897)           | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 136               | 41960 | Int Income-Cons Deposit                           |   | WP 22              | -              | -            | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 137               | 41980 | Int Income-Insurance Reis                         |   | WP 22              | (10,079)       | -            | (10,079)           | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 138               | 41990 | Int Income-City Of Richmond                       |   | WP 22              | -              | -            | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
| 139               | 41995 | Int Income-Parallax                               |   | WP 5, WP 22        | (50,311)       | 50,311       | -                  | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | 50,311   | -  | -   | -  | -  | -    |
|                   |       | Total Non-Operating Revenues                      |   |                    | \$ (156,713)   | \$ 50,756    | \$ (105,957)       | \$ -   | \$ -  | \$ -   | \$ -  | \$ -   | \$ -   | \$ -   | \$ -  | \$ -  | \$ -  | \$ 445  | \$ 50,311  | \$ -   | \$ -  | \$ -   | \$ -   | \$ - |
|                   |       | Other Deductions                                  |   |                    |                |              |                    |  |   |  |   |  |  |  |   |   |   |   |  |  |   |  |  |      |
| 140               | 42655 | Environmental Remediation                         |   | WP 5, WP 22        | \$ 631,877     | \$ (631,877) | \$ -               | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | \$ (631,877)   | -   | -  | -  | -    |
| 141               | 43120 | Int Expense-Cons Deposit                          |   | WP 22              | 6,868          | -            | 6,868              | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | -   | -  | -  | -    |
|                   |       | Total Other Deductions                            |   |                    | \$ 638,745     | \$ (631,877) | \$ 6,868           | \$ -   | \$ -  | \$ -   | \$ -  | \$ -   | \$ -   | \$ -   | \$ -  | \$ -  | \$ -  | \$ -  | \$ -   | \$ (631,877)   | \$ -  | \$ -   | \$ -   | \$ - |
| 142               |       | Return on Rate Base                               |   | WP 4, WP 17, WP 22 | (974,486)      | \$ 5,305,073 | \$ 4,330,587       | -  | -   | -  | -   | -  | -  | -  | -   | -   | -   | -   | -  | -  | \$ 5,305,073  | -  | -  | -    |
|                   |       | Revenue Requirement                               |   |                    |                |              |                    |  |   |  |   |  |  |  |   |   |   |   |  |  |   |  |  |      |
| 143               |       | Revenue Requirement                               |   |                    |                |              |                    |  |   |  |   |  |  |  |   |   |   |   |  |  |   |  |  |      |
| 144               |       | Operating Expenses                                |   |                    | \$ 82,103,312  | \$ 3,149,668 | \$ 85,252,980      | \$ 405,349   | \$ 254,123                                      | \$ (17,117)  | \$ 29,774   | \$ 50,000  | \$ 112,768   | \$ (528,849)   | \$ 2,680,000  | \$ 53,389   | \$ 110,231  | \$ -  | \$ -   | \$ -   | \$ -  | \$ -   | \$ -   | \$ - |
| 145               |       | Other Operating & Non-Operating Revenues          |   |                    | (1,187,987)    | 50,756       | (1,137,23          |  |   |  |   |  |  |  |   |   |   |   |  |  |   |  |  |      |

Direct Testimony of L. Tomczyk  
Petitioner's Exhibit 2

| Test Year Revenue Requirement Adjustments Summary LAT WP-1 |          |   |             |           |             |                    |                |                       |                                 |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
|--|----------|---|-------------|-----------|-------------|--------------------|----------------|-----------------------|---------------------------------|---------------------------|-------------------|-----------------------------|---------------------------------|---|------------------------------|-------------------------|---------------------------------|--------------------------|---|-------------------------------|--|--|------------|------------|-------|
| A  |          | B   | C           | D         | E           |                    | G              | H                     | I                               | J                         | K                 | L                           | M                               | N   | O                            | P                       | Q                               | R                        | S   | T                             | U  | V  | W          | X          |       |
| Line No.   | Acct No. | Description                                   | Source      | Test Year | Adjustments | Adjusted Test Year | Adjustment     |                       | Adjustment                      | Adjustment                | Adjustment        | Adjustment                  | Adjustment                      | Adjustment  | Adjustment                   | Adjustment              | Adjustment                      | Adjustment               | Adjustment                                    | Adjustment                    | Adjustment                                       | Adjustment   | Adjustment | Adjustment |       |
|  |          |   |             |           |             |                    | No. 1          | No. 2                 |                                 |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            | No. 1 |
|  |          |   |             |           |             |                    | Change in IMPA | Change in Labor Costs | Removal of Advertising Expenses | Uncollectibles Adjustment | Rate Case Expense | Change in Employee Benefits | Change in Depreciation Expenses | Amortization of Environmental Remediation Liability | Change in FICA-Related Taxes | Receipts Tax Adjustment | Interest Income on Bond Reserve | Parallax Interest Income | Removal of Environmental Remediation Expenses | Change in Return on Rate Base | Change in Revenues from Large Cust Load Increase | Change in Revenues from Moving Large Cust to Different Class |            |            |       |
| 156  | 58000    | Supervision Of Oper-Dist                      | WP 8, WP 22 | \$        | 734,685     | \$                 | 24,214         | \$                    | 758,899                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 157  | 58100    | Load Dispatching-Dist                         | WP 8, WP 22 |           | 88,487      |                    | 5,518          |                       | 94,005                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 158  | 58200    | Station Exp-Dist                              | WP 8, WP 22 |           | 1,491       |                    | (1,118)        |                       | 373                             |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 159  | 58300    | Oh Line Expense-General                       | WP 8, WP 22 |           | 14,806      |                    | (11,104)       |                       | 3,701                           |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 160  | 58320    | Oh Line Expense-Patrol-Test                   | WP 8, WP 22 |           | 2,341       |                    | 2,744          |                       | 5,085                           |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 161  | 58330    | Oh Line-Remove/Road-Trans                     | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 162  | 58400    | Ug Line Expense-General                       | WP 8, WP 22 |           | 14,779      |                    | (11,084)       |                       | 3,695                           |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 163  | 58600    | Meter Expense-General                         | WP 8, WP 22 |           | 130,210     |                    | 5,843          |                       | 136,052                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 164  | 58610    | Set & Remove Sp Meters                        | WP 8, WP 22 |           | 53,177      |                    | (21,133)       |                       | 32,044                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 165  | 58611    | Set & Remove-Pp Meters                        | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 166  | 58612    | Set & Remove-Solid St Misc                    | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 167  | 58620    | Meter Systems Analyses                        | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 168  | 58630    | Meter Records                                 | WP 8, WP 22 |           | 73,546      |                    | 4,840          |                       | 78,387                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 169  | 58700    | Customer Install-General                      | WP 8, WP 22 |           | 136,204     |                    | 2,847          |                       | 139,051                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 170  | 58710    | Field Inv Of Meter Malfunc                    | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 171  | 58720    | Current Diversion                             | WP 8, WP 22 |           | 15,759      |                    | 2,431          |                       | 18,190                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 172  | 58800    | Misc Dist Expense-General                     | WP 8, WP 22 |           | 19,117      |                    | 2,162          |                       | 21,279                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 173  |          | Total Transmission & Distribution Operation   |             | \$        | 1,284,601   | \$                 | 6,159          | \$                    | 1,290,761                       | \$                        | -                 | \$                          | 6,159                           | \$  | -                            | \$                      | -                               | \$                       | -   | \$                            | -  | \$   | -          | \$         | -     |
| Transmission & Distribution Maintenance                    |          |   |             |           |             |                    |                |                       |                                 |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 174  | 59000    | Supervision Of Maint-Dist                     | WP 8, WP 22 | \$        | 171,383     | \$                 | 21,278         | \$                    | 192,660                         | \$                        | 21,278            |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 175  | 59100    | Maint Of Structures                           | WP 8, WP 22 |           | 3,769       |                    | (1,702)        |                       | 2,067                           |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 176  | 59110    | Care Of Grounds-Dist                          | WP 8, WP 22 |           | -           |                    | 2,250          |                       | 2,250                           |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 177  | 59200    | Maint Of Station Equip-Gen                    | WP 8, WP 22 |           | 544,910     |                    | 88,557         |                       | 633,467                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 178  | 59210    | Maint Of Transf & Regulator                   | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 179  | 59250    | Maint Of Switchboards                         | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 180  | 59300    | Maint Of Oh Lines-General                     | WP 8, WP 22 |           | 613,277     |                    | (42,958)       |                       | 570,319                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 181  | 59310    | Maint Of Oh Lines-Tree Trim                   | WP 8, WP 22 |           | 143,969     |                    | 83,423         |                       | 227,392                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 182  | 59330    | Maint Of Oh Lines-Poles & Fix                 | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 183  | 59400    | Maint Of Ug Lines-General                     | WP 8, WP 22 |           | 118,445     |                    | 27,416         |                       | 145,861                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 184  | 59410    | Maint Of Ug Lines-Vault & Mh                  | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 185  | 59440    | Maint Of Ug Lines-Ug Serv                     | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 186  | 59450    | Maint Of Ug Lines-Network                     | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 187  | 59500    | Maint Of Line Transf-Oh                       | WP 8, WP 22 |           | 11,566      |                    | 33,423         |                       | 44,990                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 188  | 59520    | Maint Of Line Transf-Ug                       | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 189  | 59600    | Maint Of St. Light-Pend-Gen                   | WP 8, WP 22 |           | 113,923     |                    | 27,058         |                       | 140,981                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 190  | 59610    | Maint Of St. Light-Pend-Oh Li                 | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 191  | 59620    | Maint Of St. Light-Pend-Col                   | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 192  | 59640    | Maint Of St. Light-Orm-Gen                    | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 193  | 59680    | Maint Of Dusk To Dawn Light                   | WP 8, WP 22 |           | 39,623      |                    | 283            |                       | 39,906                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 194  | 59700    | Maint Of Meters-General                       | WP 8, WP 22 |           | 20,417      |                    | 14,815         |                       | 35,062                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 195  | 59800    | Maint Of Misc Dist Plant                      | WP 8, WP 22 |           | 484         |                    | 387            |                       | 871                             |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 196  |          | Total Transmission & Distribution Maintenance |             | \$        | 1,781,595   | \$                 | 254,231        | \$                    | 2,035,826                       | \$                        | -                 | \$                          | 254,231                         | \$  | -                            | \$                      | -                               | \$                       | -   | \$                            | -  | \$   | -          | \$         | -     |
| Customer Accounts & Service                                |          |   |             |           |             |                    |                |                       |                                 |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 197  | 90200    | Meter Reading Expense                         | WP 8, WP 22 | \$        | 61,344      | \$                 | (4,758)        | \$                    | 56,586                          | \$                        | (4,758)           |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 198  | 90300    | Cust Records & Collect-Gen                    | WP 8, WP 22 |           | 347,889     |                    | 18,012         |                       | 365,901                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 199  | 90310    | Cash Over And Short                           | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 200  | 90400    | Uncollect Accts Expense                       | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 201  | 90600    | Cust Serv & Informational Exp                 | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 202  |          | Customer Assistance Expenses                  | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 203  | 90900    | Supv Of Customer Service                      | WP 8, WP 22 |           | 129,529     |                    | 4,853          |                       | 134,382                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 204  | 91000    | Customer Assist Exp                           | WP 8, WP 22 |           | 16,835      |                    | (6,627)        |                       | 10,209                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 205  | 91100    | Inform Advertise Exp                          | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 206  | 91200    | Misc Customer Service Exp                     | WP 8, WP 22 |           | 143,850     |                    | 21,950         |                       | 165,800                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 207  | 91600    | Demonstration Exp                             | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 208  | 91610    | Demo Exp-Res-Misc                             | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 209  |          | Total Customer Accounts & Service             |             | \$        | 699,448     | \$                 | 33,431         | \$                    | 732,878                         | \$                        | -                 | \$                          | 33,431                          | \$  | -                            | \$                      | -                               | \$                       | -   | \$                            | -  | \$   | -          | \$         | -     |
| Administrative and General                                 |          |   |             |           |             |                    |                |                       |                                 |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 210  | 92000    | Salaries-Gen Mgr & Staff                      | WP 8, WP 22 | \$        | 297,597     | \$                 | 7,681          | \$                    | 305,279                         | \$                        | 7,681             |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 211  | 92005    | Salaries-Energy Services                      | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 212  | 92010    | Salaries-Other City Official                  | WP 8, WP 22 |           | 59,387      |                    | 1,579          |                       | 60,967                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 213  | 92015    | Salaries-Telecomm                             | WP 8, WP 22 |           | 94,245      |                    | (70,684)       |                       | 23,561                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 214  | 92020    | Salaries-Eng                                  | WP 8, WP 22 |           | 73,340      |                    | 2,745          |                       | 76,085                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 215  | 92030    | Salaries-Finance & Account                    | WP 8, WP 22 |           | 215,000     |                    | 5,411          |                       | 220,411                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 216  | 92035    | Salaries-Purch And Stores                     | WP 8, WP 22 |           | 189,474     |                    | (10,352)       |                       | 179,122                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 217  | 92040    | Salaries-Personnel                            | WP 8, WP 22 |           | 208,336     |                    | 4,088          |                       | 212,423                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 218  | 92045    | Salaries - Summer / Intern                    | WP 8, WP 22 |           | 21,016      |                    | 2,988          |                       | 24,004                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 219  | 92060    | Salaries-Information Sys                      | WP 8, WP 22 |           | 372,749     |                    | 10,688         |                       | 383,437                         |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 220  | 92100    | Office Supp-Adm & Gen                         | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 221  | 92110    | Office Supp-Other City Office                 | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 222  | 92130    | Association Membership Dues                   | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 223  | 92135    | APPA - Rodeo                                  | WP 8, WP 22 |           | 22,327      |                    | 2,004          |                       | 24,332                          |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 224  | 92140    | Computer Hardware and Support                 | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 225  | 92145    | Network Hardware and Maintenance              | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 226  | 92150    | Computer Software and Support                 | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 227  | 92160    | Clothing                                      | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 228  | 92170    | Employee Empowerment Committee                | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 229  | 92175    | Safety Council                                | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 230  | 92300    | Outside Services Employed                     | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 231  | 92400    | Property Insurance                            | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 232  | 92500    | Injuries & Damage-Insurance                   | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 233  | 92520    | Injuries & Damage-Wc                          | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 234  | 92530    | Injuries & Damage-Damage Se                   | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 235  | 92600    | Empl Benefits-General                         | WP 8, WP 22 |           | (51)        |                    | 39             |                       | (13)                            |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 236  | 92610    | Empl Benefits-Pension                         | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            |            |       |
| 237  | 92615    | Employee Benefit - Defined Contribution Plan  | WP 8, WP 22 |           | -           |                    | -              |                       | -                               |                           |                   |                             |                                 |   |                              |                         |                                 |                          |   |                               |  |  |            | </         |       |



**Attachment LAT-2**  
**Page 4 of 45**

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Test Year Gross Plant & Accumulated Depreciation Adjustments Summary LAT WP-2

| A                               |             | B        | C  | D            | E         | F                  | G                   | H                     | I   | J   |
|---------------------------------|-------------|----------|--|--------------|-----------|--------------------|---------------------|-----------------------|---|---|
| Line No                         |             | Acct No. | Description  | Source       | Test Year | Adjustments        | Adjusted Test Year  |                       | Adjustment<br>No. 1<br>Change in<br>Gross Plant in<br>Service | Adjustment<br>No. 2<br>Change in<br>Accumulated<br>Depreciation |
| <b>Gross Plant</b>              |             |          |  |              |           |                    |                     |                       |   |   |
| <b>Production</b>               |             |          |  |              |           |                    |                     |                       |   |   |
| 1                               | 31000       |          | Land and Land Rights - Whitewater Valley Station                           | WP 9         | \$        | 80,644             | \$ -                | \$ 80,644             |   |   |
| 2                               | 31100       |          | Structures and Improvements - Whitewater Valley Station                    | WP 9         |           | 2,848,645          | -                   | 2,848,645             |   |   |
| 3                               | 31200       |          | Boilers and Accessories, Coal and Ash Handling Equipment                   | WP 9         |           | 24,874,229         | -                   | 24,874,229            |   |   |
| 4                               | 31400       |          | Main Turbine - Driven Units and Accessory Equipment                        | WP 9         |           | 12,493,390         | -                   | 12,493,390            |   |   |
| 5                               | 31440       |          | Cooling Towers   | WP 9         |           | 119,063            | -                   | 119,063               |   |   |
| 6                               | 31500       |          | Accessory Electric Equipment - Whitewater Valley Station                   | WP 9         |           | 2,282,710          | -                   | 2,282,710             |   |   |
| 7                               | 31600       |          | Misc Power Plant Equipment - Whitewater Valley Station                     | WP 9         |           | 9,516,266          | -                   | 9,516,266             |   |   |
| 8                               | 34600       |          | Misc Power Plant Equipment - WWVS - Landfill                               | WP 9         |           | 880,800            | -                   | 880,800               |   |   |
| 9                               |             |          | Total Production   |              | \$        | 53,095,746         | \$ -                | \$ 53,095,746         | \$ -  | \$ -  |
| <b>Transmission</b>             |             |          |  |              |           |                    |                     |                       |   |   |
| 10                              | 35000       |          | Land and Land Rights - Transmission Plant                                  | WP 9, WP 14  | \$        | 568,632            | \$ 8                | \$ 568,641            | \$ 8  |   |
| 11                              | 35200       |          | Structures and Improvements - Transmission Plant                           | WP 9, WP 14  |           | 560,359            | -                   | 560,359               | -   |   |
| 12                              | 35300       |          | Station Equipment - General  | WP 9, WP 14  |           | 2,423,466          | 61,029              | 2,484,495             | 61,029  |   |
| 13                              | 35305       |          | Station Equipment - IMPA Peaker  | WP 9, WP 14  |           | 2,958,506          | (2,958,506)         | -                     | (2,958,506)   |   |
| 14                              | 35310       |          | Station Equipment - Whitewater Sub   | WP 9, WP 14  |           | 2,807,177          | 151,328             | 2,958,506             | 151,328   |   |
| 15                              | 35320       |          | Station Equipment - Richmond Sub   | WP 9, WP 14  |           | 3,553,365          | (746,188)           | 2,807,177             | (746,188)   |   |
| 16                              | 35325       |          | Station Equipment - Johns Manville   | WP 9, WP 14  |           | 2,310,090          | 1,245,596           | 3,555,686             | 1,245,596   |   |
| 17                              | 35330       |          | Station Equipment - Johnson Street Sub                                     | WP 9, WP 14  |           | 2,635,118          | (321,938)           | 2,313,180             | (321,938)   |   |
| 18                              | 35340       |          | Station Equipment - Hodgkin Sub  | WP 9, WP 14  |           | 34,449             | 2,600,669           | 2,635,118             | 2,600,669   |   |
| 19                              | 35350       |          | Station Equipment - Treaty Line Sub  | WP 9, WP 14  |           | 1,329,973          | (1,295,525)         | 34,449                | (1,295,525)   |   |
| 20                              | 35360       |          | Station Equipment - NW 11Th Street Sub                                     | WP 9, WP 14  |           | 689,550            | 640,827             | 1,330,377             | 640,827   |   |
| 21                              | 35370       |          | Station Equipment - East Sub   | WP 9, WP 14  |           | 92,923             | 596,807             | 689,730               | 596,807   |   |
| 22                              | 35380       |          | Station Equipment - Shawnee Sub  | WP 9, WP 14  |           | -                  | 105,285             | 105,285               | 105,285   |   |
| 23                              | 35385       |          | Station Equipment - Garr Jackson Substation                                | WP 9, WP 14  |           | 248,423            | (248,423)           | -                     | (248,423)   |   |
| 24                              | 35390       |          | Station Equipment - Williamsburg Sub                                       | WP 9, WP 14  |           | 2,381,778          | (2,133,355)         | 248,423               | (2,133,355)   |   |
| 25                              | 35395       |          | Station Equipment - Highland Sub   | WP 9, WP 14  |           | 320,801            | 2,060,977           | 2,381,778             | 2,060,977   |   |
| 26                              | 35400       |          | Towers and Appurtenant Fixtures - Transmission Plant                       | WP 9, WP 14  |           | 3,626,557          | (3,305,756)         | 320,801               | (3,305,756)   |   |
| 27                              | 35500       |          | Line Poles and Appurtenant Fixtures - Transmission Plant                   | WP 9, WP 14  |           | 2,028,656          | 1,596,797           | 3,625,452             | 1,596,797   |   |
| 28                              | 35600       |          | Overhead Conductors and Devices - Transmission Plant                       | WP 9, WP 14  |           | 71,272             | 1,957,155           | 2,028,427             | 1,957,155   |   |
| 29                              | 35700       |          | Underground Conduit and Tunnels - Transmission Plant                       | WP 9, WP 14  |           | 228,678            | (157,405)           | 71,273                | (157,405)   |   |
| 30                              | 35800       |          | Underground Conductors and Devices - Transmission Plant                    | WP 9, WP 14  |           | 783                | 227,895             | 228,678               | 227,895   |   |
| 31                              | 35900       |          | Roads, Trails and Bridges - Transmission Plant                             | WP 9, WP 14  |           | -                  | 783                 | 783                   | 783   |   |
| 32                              |             |          | Total Transmission   |              | \$        | 28,870,554         | \$ 78,063           | \$ 28,948,617         | \$ 78,063   | \$ -  |
| <b>Distribution</b>             |             |          |  |              |           |                    |                     |                       |   |   |
| 33                              | 36000       |          | Land and Land Rights - Distribution Plant                                  | WP 9, WP 14  | \$        | 240,050            | \$ 113              | \$ 240,163            | \$ 113  |   |
| 34                              | 36100       |          | Structures and Improvements - Distribution Plant                           | WP 9, WP 14  |           | 919,951            | 1,269               | 921,220               | 1,269   |   |
| 35                              | 36200       |          | Station Equipment - Distribution Plant                                     | WP 9, WP 14  |           | 8,796,394          | 100,000             | 8,896,394             | 100,000   |   |
| 36                              | 36300       |          | Storage Battery Equipment - Distribution Plant                             | WP 9, WP 14  |           | 72,170             | -                   | 72,170                | -   |   |
| 37                              | 36400       |          | Poles, Towers and Appurtenant Fixtures - Distribution Plant                | WP 9, WP 14  |           | 13,234,200         | 298,559             | 13,532,759            | 298,559   |   |
| 38                              | 36500       |          | Overhead Conductors and Devices - Distribution Plant                       | WP 9, WP 14  |           | 11,895,976         | 57,827              | 11,953,803            | 57,827  |   |
| 39                              | 36600       |          | Underground Conduit and Tunnels - Distribution Plant                       | WP 9, WP 14  |           | 8,554,234          | 342,881             | 8,897,114             | 342,881   |   |
| 40                              | 36700       |          | Underground Conductors and Devices - Distribution Plant                    | WP 9, WP 14  |           | 10,094,925         | 180,638             | 10,275,562            | 180,638   |   |
| 41                              | 36810       |          | Overhead Line Transformers - Distribution Plant                            | WP 9, WP 14  |           | 4,241,836          | (27,758)            | 4,214,078             | (27,758)  |   |
| 42                              | 36820       |          | Underground Line Transformers - Distribution Plant                         | WP 9, WP 14  |           | 6,715,934          | 23,615              | 6,739,549             | 23,615  |   |
| 43                              | 36910       |          | Overhead Services - Distribution Plant                                     | WP 9, WP 14  |           | 4,956,353          | 31,242              | 4,987,594             | 31,242  |   |
| 44                              | 36920       |          | Underground Services - Distribution Plant                                  | WP 9, WP 14  |           | 2,804,119          | 4,547               | 2,808,666             | 4,547   |   |
| 45                              | 37000       |          | Meters, Devices and Installation   | WP 9, WP 14  |           | 6,077,694          | 270,822             | 6,348,516             | 270,822   |   |
| 46                              | 37100       |          | Unmetered Outdoor Lighting Equipment - Installation on Customers' Property | WP 9, WP 14  |           | 1,035,712          | 27,995              | 1,063,707             | 27,995  |   |
| 47                              | 37310       |          | Public Street and Highway Lighting - Pendants                              | WP 9, WP 14  |           | 2,527,002          | 29,657              | 2,556,659             | 29,657  |   |
| 48                              | 37320       |          | Public Street and Highway Lighting - Ornamentals                           | WP 9, WP 14  |           | 1,500,922          | 13,635              | 1,514,557             | 13,635  |   |
| 49                              |             |          | Total Distribution   |              | \$        | 83,667,470         | \$ 1,355,042        | \$ 85,022,512         | \$ 1,355,042  | \$ -  |
| <b>General</b>                  |             |          |  |              |           |                    |                     |                       |   |   |
| 50                              | 38900       |          | Land and Land Rights - 8th Street Office                                   | WP 9, WP 14  | \$        | 49,038             | \$ -                | \$ 49,038             | \$ -  |   |
| 51                              | 39000       |          | Structures and Improvements - General Plant                                | WP 9, WP 14  |           | 691,614            | 169,686             | 861,299               | 169,686   |   |
| 52                              | 39010       |          | Structures and Improvements - 8th Street                                   | WP 9, WP 14  |           | 331,798            | 380                 | 332,177               | 380   |   |
| 53                              | 39020       |          | Structures and Improvements - Stores                                       | WP 9, WP 14  |           | 99,700             | -                   | 99,700                | -   |   |
| 54                              | 39030       |          | Structures and Improvements - General Offices                              | WP 9, WP 14  |           | 3,633,405          | -                   | 3,633,405             | -   |   |
| 55                              | 39040       |          | Improvements to Land   | WP 9, WP 14  |           | 460,500            | -                   | 460,500               | -   |   |
| 56                              | 39100       |          | Office Equipment and Furniture - General                                   | WP 9, WP 14  |           | 7,975,938          | 354,378             | 8,330,316             | 354,378   |   |
| 57                              | 39200       |          | Vehicles   | WP 9, WP 14  |           | 3,744,002          | 185,733             | 3,929,736             | 185,733   |   |
| 58                              | 39300       |          | Stores Equipment   | WP 9, WP 14  |           | 54,877             | 3,000               | 57,877                | 3,000   |   |
| 59                              | 39400       |          | Tools, Implements and Garage Equipment                                     | WP 9, WP 14  |           | 1,385,447          | 5,428               | 1,390,874             | 5,428   |   |
| 60                              | 39500/39510 |          | General Laboratory & Power Quality Equipment                               | WP 9, WP 14  |           | 847,228            | 18,378              | 865,606               | 18,378  |   |
| 61                              | 39600       |          | Power Operated Equipment and Accessories                                   | WP 9, WP 14  |           | 1,598,583          | 11,975              | 1,610,558             | 11,975  |   |
| 62                              | 39700/39710 |          | Telephones, Radios, Fiber and Miscellaneous Communication Equipment        | WP 9, WP 14  |           | 4,563,377          | 44,772              | 4,608,150             | 44,772  |   |
| 63                              | 39800       |          | Miscellaneous Utility Equipment, Apparatus, Etc.                           | WP 9, WP 14  |           | 349,804            | 45,781              | 395,586               | 45,781  |   |
| 64                              | 39900       |          | Other Tangible Utility Property  | WP 9, WP 14  |           | 85,873             | -                   | 85,873                | -   |   |
| 65                              |             |          | Total General  |              | \$        | 25,871,184         | \$ 839,512          | \$ 26,710,695         | \$ 839,512  | \$ -  |
| 66                              |             |          | <b>TOTAL GROSS PLANT</b>   |              | <b>\$</b> | <b>191,504,954</b> | <b>\$ 2,272,617</b> | <b>\$ 193,777,571</b> | <b>\$ 2,272,617</b>   | <b>\$ -</b>   |
| <b>Accumulated Depreciation</b> |             |          |  |              |           |                    |                     |                       |   |   |
| <b>Production</b>               |             |          |  |              |           |                    |                     |                       |   |   |
| 67                              | 31000       |          | Land and Land Rights - Whitewater Valley Station                           | WP 10, WP 14 | \$        | -                  | \$ -                | \$ -                  |   | \$ -  |
| 68                              | 31100       |          | Structures and Improvements - Whitewater Valley Station                    | WP 10, WP 14 |           | 2,773,210          | 75,435              | 2,848,645             |   | 75,435  |
| 69                              | 31200       |          | Boilers and Accessories, Coal and Ash Handling Equipment                   | WP 10, WP 14 |           | 24,735,363         | 138,866             | 24,874,229            |   | 138,866   |
| 70                              | 31400       |          | Main Turbine - Driven Units and Accessory Equipment                        | WP 10, WP 14 |           | 12,493,390         | -                   | 12,493,390            |   | -   |
| 71                              | 31440       |          | Cooling Towers   | WP 10, WP 14 |           | 115,570            | 3,493               | 119,063               |   | 3,493   |
| 72                              | 31500       |          | Accessory Electric Equipment - Whitewater Valley Station                   | WP 10, WP 14 |           | 2,282,710          | -                   | 2,282,710             |   | -   |
| 73                              | 31600       |          | Misc Power Plant Equipment - Whitewater Valley Station                     | WP 10, WP 14 |           | 3,798,832          | 333,107             | 4,131,940             |   | 333,107   |
| 74                              | 34600       |          | Misc Power Plant Equipment - WWVS - Landfill                               | WP 10, WP 14 |           | 434,210            | 30,832              | 465,042               |   | 30,832  |
| 75                              |             |          | Total Production   |              | \$        | 46,633,285         | \$ 581,733          | \$ 47,215,018         | \$ -  | \$ 581,733  |
| <b>Transmission</b>             |             |          |  |              |           |                    |                     |                       |   |   |
| 76                              | 35000       |          | Land and Land Rights - Transmission Plant                                  | WP 10, WP 14 | \$        | -                  | \$ -                | \$ -                  |   | \$ -  |
| 77                              | 35200       |          | Structures and Improvements - Transmission Plant                           | WP 10, WP 14 |           | 419,796            | 8,405               | 428,201               |   | 8,405   |
| 78                              | 35300       |          | Station Equipment - General  | WP 10, WP 14 |           | 1,187,398          | 86,610              | 1,274,008             |   | 86,610  |

Test Year Gross Plant & Accumulated Depreciation Adjustments Summary LAT WP-2

| A            |             | B  | C            | D         | E           | F                  | G           | H  | I              | J            |    |             |           |
|--------------|-------------|--|--------------|-----------|-------------|--------------------|-------------|----|----------------|--------------|----|-------------|-----------|
|              |             |  |              |           |             |                    |             |    | Adjustment     | Adjustment   |    |             |           |
|              |             |  |              |           |             |                    |             |    | No. 1          | No. 2        |    |             |           |
|              |             |  |              |           |             |                    |             |    | Change in      | Change in    |    |             |           |
|              |             |  |              |           |             |                    |             |    | Gross Plant in | Accumulated  |    |             |           |
|              |             |  |              |           |             |                    |             |    | Service        | Depreciation |    |             |           |
| Line No      | Acct No.    | Description  | Source       | Test Year | Adjustments | Adjusted Test Year |             |    |                |              |    |             |           |
| 79           | 35305       | Station Equipment - IMPA Peaker  | WP 10, WP 14 | 1,679,134 | (1,679,134) | -                  |             |    |                | (1,679,134)  |    |             |           |
| 80           | 35310       | Station Equipment - Whitewater Sub   | WP 10, WP 14 | 2,807,177 | (1,024,484) | 1,782,694          |             |    |                | (1,024,484)  |    |             |           |
| 81           | 35320       | Station Equipment - Richmond Sub   | WP 10, WP 14 | 1,458,408 | 1,348,769   | 2,807,177          |             |    |                | 1,348,769    |    |             |           |
| 82           | 35325       | Station Equipment - Johns Manville   | WP 10, WP 14 | 704,165   | 878,693     | 1,582,858          |             |    |                | 878,693      |    |             |           |
| 83           | 35330       | Station Equipment - Johnson Street Sub                                     | WP 10, WP 14 | 1,396,711 | (611,594)   | 785,117            |             |    |                | (611,594)    |    |             |           |
| 84           | 35340       | Station Equipment - Hodgkin Sub  | WP 10, WP 14 | 20,001    | 1,468,950   | 1,488,951          |             |    |                | 1,468,950    |    |             |           |
| 85           | 35350       | Station Equipment - Treaty Line Sub  | WP 10, WP 14 | 772,956   | (751,749)   | 21,207             |             |    |                | (751,749)    |    |             |           |
| 86           | 35360       | Station Equipment - NW 11Th Street Sub                                     | WP 10, WP 14 | 504,411   | 315,111     | 819,523            |             |    |                | 315,111      |    |             |           |
| 87           | 35370       | Station Equipment - East Sub   | WP 10, WP 14 | 21,163    | 507,390     | 528,553            |             |    |                | 507,390      |    |             |           |
| 88           | 35380       | Station Equipment - Shawnee Sub  | WP 10, WP 14 | -         | 24,776      | 24,776             |             |    |                | 24,776       |    |             |           |
| 89           | 35385       | Station Equipment - Garr Jackson Substation                                | WP 10, WP 14 | 146,886   | (146,886)   | -                  |             |    |                | (146,886)    |    |             |           |
| 90           | 35390       | Station Equipment - Williamsburg Sub                                       | WP 10, WP 14 | 783,902   | (628,320)   | 155,582            |             |    |                | (628,320)    |    |             |           |
| 91           | 35395       | Station Equipment - Highland Sub   | WP 10, WP 14 | 119,010   | 748,263     | 867,273            |             |    |                | 748,263      |    |             |           |
| 92           | 35400       | Towers and Appurtenant Fixtures - Transmission Plant                       | WP 10, WP 14 | 2,534,274 | (2,408,846) | 125,427            |             |    |                | (2,408,846)  |    |             |           |
| 93           | 35500       | Line Poles and Appurtenant Fixtures - Transmission Plant                   | WP 10, WP 14 | 1,209,826 | 1,432,123   | 2,641,949          |             |    |                | 1,432,123    |    |             |           |
| 94           | 35600       | Overhead Conductors and Devices - Transmission Plant                       | WP 10, WP 14 | 23,170    | 1,227,006   | 1,250,176          |             |    |                | 1,227,006    |    |             |           |
| 95           | 35700       | Underground Conduit and Tunnels - Transmission Plant                       | WP 10, WP 14 | 154,055   | (129,103)   | 24,952             |             |    |                | (129,103)    |    |             |           |
| 96           | 35800       | Underground Conductors and Devices - Transmission Plant                    | WP 10, WP 14 | 783       | 158,988     | 159,771            |             |    |                | 158,988      |    |             |           |
| 97           | 35900       | Roads, Trails and Bridges - Transmission Plant                             | WP 10, WP 14 | -         | 783         | 783                |             |    |                | 783          |    |             |           |
| 98           |             | Total Transmission   |              | \$        | 15,943,226  | \$                 | 825,752     | \$ | 16,768,978     | \$ -         | \$ | 825,752     |           |
| Distribution |             |  |              |           |             |                    |             |    |                |              |    |             |           |
| 99           | 36000       | Land and Land Rights - Distribution Plant                                  | WP 10, WP 14 | \$        | -           | \$                 | -           | \$ | -              |              | \$ | -           |           |
| 100          | 36100       | Structures and Improvements - Distribution Plant                           | WP 10, WP 14 |           | 639,183     |                    | 20,723      |    | 659,906        |              |    | 20,723      |           |
| 101          | 36200       | Station Equipment - Distribution Plant                                     | WP 10, WP 14 |           | 8,796,394   |                    | -           |    | 8,796,394      |              |    | -           |           |
| 102          | 36300       | Storage Battery Equipment - Distribution Plant                             | WP 10, WP 14 |           | 38,171      |                    | 3,609       |    | 41,780         |              |    | 3,609       |           |
| 103          | 36400       | Poles, Towers and Appurtenant Fixtures - Distribution Plant                | WP 10, WP 14 |           | 8,043,757   |                    | 396,030     |    | 8,439,787      |              |    | 396,030     |           |
| 104          | 36500       | Overhead Conductors and Devices - Distribution Plant                       | WP 10, WP 14 |           | 7,978,746   |                    | 352,888     |    | 8,331,634      |              |    | 352,888     |           |
| 105          | 36600       | Underground Conduit and Tunnels - Distribution Plant                       | WP 10, WP 14 |           | 2,609,640   |                    | 145,737     |    | 2,755,377      |              |    | 145,737     |           |
| 106          | 36700       | Underground Conductors and Devices - Distribution Plant                    | WP 10, WP 14 |           | 4,709,541   |                    | 255,686     |    | 4,965,227      |              |    | 255,686     |           |
| 107          | 36810       | Overhead Line Transformers - Distribution Plant                            | WP 10, WP 14 |           | 3,688,364   |                    | 119,961     |    | 3,808,325      |              |    | 119,961     |           |
| 108          | 36820       | Underground Line Transformers - Distribution Plant                         | WP 10, WP 14 |           | 4,412,376   |                    | 211,604     |    | 4,623,980      |              |    | 211,604     |           |
| 109          | 36910       | Overhead Services - Distribution Plant                                     | WP 10, WP 14 |           | 4,081,018   |                    | 149,030     |    | 4,230,048      |              |    | 149,030     |           |
| 110          | 36920       | Underground Services - Distribution Plant                                  | WP 10, WP 14 |           | 1,492,088   |                    | 83,818      |    | 1,575,906      |              |    | 83,818      |           |
| 111          | 37000       | Meters, Devices and Installation   | WP 10, WP 14 |           | 1,208,514   |                    | 86,316      |    | 1,294,830      |              |    | 86,316      |           |
| 112          | 37100       | Unmetered Outdoor Lighting Equipment - Installation on Customers' Property | WP 10, WP 14 |           | 705,142     |                    | 36,798      |    | 741,940        |              |    | 36,798      |           |
| 113          | 37310       | Public Street and Highway Lighting - Pendants                              | WP 10, WP 14 |           | 2,526,797   |                    | (165)       |    | 2,526,632      |              |    | (165)       |           |
| 114          | 37320       | Public Street and Highway Lighting - Ornamentals                           | WP 10, WP 14 |           | 1,496,966   |                    | 13,713      |    | 1,510,678      |              |    | 13,713      |           |
| 115          |             | Total Distribution   |              | \$        | 52,426,697  | \$                 | 1,875,748   | \$ | 54,302,444     | \$           | -  | \$          | 1,875,748 |
| General      |             |  |              |           |             |                    |             |    |                |              |    |             |           |
| 116          | 38900       | Land and Land Rights - 8th Street Office                                   | WP 10, WP 14 | \$        | -           | \$                 | -           |    |                |              | \$ | -           |           |
| 117          | 39000       | Structures and Improvements - General Plant                                | WP 10, WP 14 |           | 25,286      |                    | 15,624      |    | 40,911         |              |    | 15,624      |           |
| 118          | 39010       | Structures and Improvements - 8th Street                                   | WP 10, WP 14 |           | 194,341     |                    | 6,644       |    | 200,985        |              |    | 6,644       |           |
| 119          | 39020       | Structures and Improvements - Stores                                       | WP 10, WP 14 |           | 74,457      |                    | 1,994       |    | 76,451         |              |    | 1,994       |           |
| 120          | 39030       | Structures and Improvements - General Offices                              | WP 10, WP 14 |           | 1,834,064   |                    | 72,683      |    | 1,906,747      |              |    | 72,683      |           |
| 121          | 39040       | Improvements to Land   | WP 10, WP 14 |           | 205,457     |                    | 9,212       |    | 214,669        |              |    | 9,212       |           |
| 122          | 39100       | Office Equipment and Furniture - General                                   | WP 10, WP 14 |           | 7,977,136   |                    | (4,069)     |    | 7,973,066      |              |    | (4,069)     |           |
| 123          | 39200       | Vehicles   | WP 10, WP 14 |           | 2,634,509   |                    | 111,343     |    | 2,745,852      |              |    | 111,343     |           |
| 124          | 39300       | Stores Equipment   | WP 10, WP 14 |           | 49,755      |                    | 2,255       |    | 52,009         |              |    | 2,255       |           |
| 125          | 39410       | Tools, Implements and Garage Equipment                                     | WP 10, WP 14 |           | 1,056,296   |                    | (1,056,296) |    | -              |              |    | (1,056,296) |           |
| 126          | 39500/39510 | General Laboratory & Power Quality Equipment                               | WP 10, WP 14 |           | 842,496     |                    | 6,399       |    | 848,895        |              |    | 6,399       |           |
| 127          | 39600       | Power Operated Equipment and Accessories                                   | WP 10, WP 14 |           | 1,497,956   |                    | 70,298      |    | 1,568,253      |              |    | 70,298      |           |
| 128          | 39700/39710 | Telephones, Radios, Fiber and Miscellaneous Communication Equipment        | WP 10, WP 14 |           | 3,623,902   |                    | 182,808     |    | 3,806,710      |              |    | 182,808     |           |
| 129          | 39800       | Miscellaneous Utility Equipment, Apparatus, Etc.                           | WP 10, WP 14 |           | 301,802     |                    | 14,952      |    | 316,753        |              |    | 14,952      |           |
| 130          | 39900       | Other Tangible Utility Property  | WP 10, WP 14 |           | 82,507      |                    | -           |    | 82,507         |              |    | -           |           |
| 131          |             | Total General  |              | \$        | 20,399,964  | \$                 | (566,155)   | \$ | 19,833,809     | \$           | -  | \$          | (566,155) |
| 132          |             | TOTAL ACCUMULATED DEPRECIATION   |              | \$        | 135,403,172 | \$                 | 2,717,077   | \$ | 138,120,249    | \$           | -  | \$          | 2,717,077 |
| Net Plant    |             |  |              |           |             |                    |             |    |                |              |    |             |           |
| Production   |             |  |              |           |             |                    |             |    |                |              |    |             |           |
| 133          | 31000       | Land and Land Rights - Whitewater Valley Station                           |              | \$        | 80,644      | \$                 | -           | \$ | 80,644         |              |    |             |           |
| 134          | 31100       | Structures and Improvements - Whitewater Valley Station                    |              |           | 75,435      |                    | (75,435)    |    | -              |              |    |             |           |
| 135          | 31200       | Boilers and Accessories, Coal and Ash Handling Equipment                   |              |           | 138,866     |                    | (138,866)   |    | -              |              |    |             |           |
| 136          | 31400       | Main Turbine - Driven Units and Accessory Equipment                        |              |           | 0           |                    | (0)         |    | 0              |              |    |             |           |
| 137          | 31440       | Cooling Towers   |              |           | 3,493       |                    | (3,493)     |    | -              |              |    |             |           |
| 138          | 31500       | Accessory Electric Equipment - Whitewater Valley Station                   |              |           | -           |                    | -           |    | -              |              |    |             |           |
| 139          | 31600       | Misc Power Plant Equipment - Whitewater Valley Station                     |              |           | 5,717,434   |                    | (333,107)   |    | 5,384,327      |              |    |             |           |
| 140          | 34600       | Misc Power Plant Equipment - WWVS - Landfill                               |              |           | 446,589     |                    | (30,832)    |    | 415,758        |              |    |             |           |
| 141          |             | Total Production   |              | \$        | 6,462,461   | \$                 | (581,733)   | \$ | 5,880,728      |              |    |             |           |
| Transmission |             |  |              |           |             |                    |             |    |                |              |    |             |           |
| 142          | 35000       | Land and Land Rights - Transmission Plant                                  |              | \$        | 568,632     | \$                 | 8           | \$ | 568,641        |              |    |             |           |
| 143          | 35200       | Structures and Improvements - Transmission Plant                           |              |           | 140,563     |                    | (8,405)     |    | 132,158        |              |    |             |           |
| 144          | 35300       | Station Equipment - General  |              |           | 1,236,067   |                    | (25,581)    |    | 1,210,487      |              |    |             |           |
| 145          | 35305       | Station Equipment - IMPA Peaker  |              |           | 1,279,372   |                    | (1,279,372) |    | -              |              |    |             |           |
| 146          | 35310       | Station Equipment - Whitewater Sub   |              |           | 0           |                    | 1,175,812   |    | 1,175,812      |              |    |             |           |
| 147          | 35320       | Station Equipment - Richmond Sub   |              |           | 2,094,957   |                    | (2,094,957) |    | 0              |              |    |             |           |
| 148          | 35325       | Station Equipment - Johns Manville   |              |           | 1,605,925   |                    | 366,903     |    | 1,972,828      |              |    |             |           |
| 149          | 35330       | Station Equipment - Johnson Street Sub                                     |              |           | 1,238,406   |                    | 289,656     |    | 1,528,062      |              |    |             |           |
| 150          | 35340       | Station Equipment - Hodgkin Sub  |              |           | 14,448      |                    | 1,131,719   |    | 1,146,167      |              |    |             |           |
| 151          | 35350       | Station Equipment - Treaty Line Sub  |              |           | 557,017     |                    | (543,775)   |    | 13,242         |              |    |             |           |
| 152          | 35360       | Station Equipment - NW 11Th Street Sub                                     |              |           | 185,138     |                    | 325,716     |    | 510,854        |              |    |             |           |
| 153          | 35370       | Station Equipment - East Sub   |              |           | 71,760      |                    | 89,417      |    | 161,177        |              |    |             |           |
| 154          | 35380       | Station Equipment - Shawnee Sub  |              |           | -           |                    | 80,509      |    | 80,509         |              |    |             |           |
| 155          | 35385       | Station Equipment - Garr Jackson Substation                                |              |           | 101,537     |                    | (101,537)   |    | -              |              |    |             |           |
| 156          | 35390       | Station Equipment - Williamsburg Sub                                       |              |           | 1,597,876   |                    | (1,505,035) |    | 92,841         |              |    |             |           |
| 157          | 35395       | Station Equipment - Highland Sub   |              |           | 201,791     |                    | 1,312,713   |    | 1,514,505      |              |    |             |           |
| 158          | 35400       | Towers and Appurtenant Fixtures - Transmission Plant                       |              |           | 1,092,283   |                    | (896,909)   |    | 195,374        |              |    |             |           |
| 159          | 35500       | Line Poles and Appurtenant Fixtures - Transmission Plant                   |              |           | 818,830     |                    | 164,674     |    | 983,503        |              |    |             |           |
| 160          | 35600       | Overhead Conductors and Devices - Transmission Plant                       |              |           | 48,102      |                    | 730,149     |    | 778,251        |              |    |             |           |

Test Year Gross Plant & Accumulated Depreciation Adjustments Summary LAT WP-2

| A                   |             | B        | C  | D      | E                    | F                   | G                    | H | I   | J   |
|---------------------|-------------|----------|--|--------|----------------------|---------------------|----------------------|---|---|---|
| Line No             |             | Acct No. | Description  | Source | Test Year            | Adjustments         | Adjusted Test Year   |   | Adjustment<br>No. 1<br>Change in<br>Gross Plant in<br>Service | Adjustment<br>No. 2<br>Change in<br>Accumulated<br>Depreciation |
| 161                 | 35700       |          | Underground Conduit and Tunnels - Transmission Plant                       |        | 74,623               | (28,301)            | 46,321               |   |   |   |
| 162                 | 35800       |          | Underground Conductors and Devices - Transmission Plant                    |        | 0                    | 68,907              | 68,907               |   |   |   |
| 163                 | 35900       |          | Roads, Trails and Bridges - Transmission Plant                             |        | -                    | 0                   | 0                    |   |   |   |
| 164                 |             |          | Total Transmission   |        | \$ 12,927,328        | \$ (747,689)        | \$ 12,179,639        |   |   |   |
| <b>Distribution</b> |             |          |  |        |                      |                     |                      |   |   |   |
| 165                 | 36000       |          | Land and Land Rights - Distribution Plant                                  |        | \$ 240,050           | \$ 113              | \$ 240,163           |   |   |   |
| 166                 | 36100       |          | Structures and Improvements - Distribution Plant                           |        | 280,768              | (19,453)            | 261,314              |   |   |   |
| 167                 | 36200       |          | Station Equipment - Distribution Plant                                     |        | 0                    | 100,000             | 100,000              |   |   |   |
| 168                 | 36300       |          | Storage Battery Equipment - Distribution Plant                             |        | 33,999               | (3,609)             | 30,390               |   |   |   |
| 169                 | 36400       |          | Poles, Towers and Appurtenant Fixtures - Distribution Plant                |        | 5,190,443            | (97,471)            | 5,092,972            |   |   |   |
| 170                 | 36500       |          | Overhead Conductors and Devices - Distribution Plant                       |        | 3,917,230            | (295,061)           | 3,622,169            |   |   |   |
| 171                 | 36600       |          | Underground Conduit and Tunnels - Distribution Plant                       |        | 5,944,594            | 197,143             | 6,141,737            |   |   |   |
| 172                 | 36700       |          | Underground Conductors and Devices - Distribution Plant                    |        | 5,385,384            | (75,048)            | 5,310,336            |   |   |   |
| 173                 | 36810       |          | Overhead Line Transformers - Distribution Plant                            |        | 553,472              | (147,718)           | 405,753              |   |   |   |
| 174                 | 36820       |          | Underground Line Transformers - Distribution Plant                         |        | 2,303,558            | (187,989)           | 2,115,569            |   |   |   |
| 175                 | 36910       |          | Overhead Services - Distribution Plant                                     |        | 875,335              | (117,789)           | 757,546              |   |   |   |
| 176                 | 36920       |          | Underground Services - Distribution Plant                                  |        | 1,312,031            | (79,270)            | 1,232,760            |   |   |   |
| 177                 | 37000       |          | Meters, Devices and Installation   |        | 4,869,180            | 184,506             | 5,053,686            |   |   |   |
| 178                 | 37100       |          | Unmetered Outdoor Lighting Equipment - Installation on Customers' Premises |        | 330,569              | (8,803)             | 321,767              |   |   |   |
| 179                 | 37310       |          | Public Street and Highway Lighting - Pendants                              |        | 206                  | 29,821              | 30,027               |   |   |   |
| 180                 | 37320       |          | Public Street and Highway Lighting - Ornaments                             |        | 3,956                | (78)                | 3,878                |   |   |   |
| 181                 |             |          | Total Distribution   |        | \$ 31,240,773        | \$ (520,705)        | \$ 30,720,068        |   |   |   |
| <b>General</b>      |             |          |  |        |                      |                     |                      |   |   |   |
| 182                 | 38900       |          | Land and Land Rights - 8th Street Office                                   |        | \$ 49,038            | -                   | \$ 49,038            |   |   |   |
| 183                 | 39000       |          | Structures and Improvements - General Plant                                |        | 666,328              | 154,061             | 820,389              |   |   |   |
| 184                 | 39010       |          | Structures and Improvements - 8th Street                                   |        | 137,456              | (6,264)             | 131,192              |   |   |   |
| 185                 | 39020       |          | Structures and Improvements - Stores                                       |        | 25,243               | (1,994)             | 23,248               |   |   |   |
| 186                 | 39030       |          | Structures and Improvements - General Offices                              |        | 1,799,341            | (72,683)            | 1,726,658            |   |   |   |
| 187                 | 39040       |          | Improvements to Land   |        | 255,043              | (9,212)             | 245,831              |   |   |   |
| 188                 | 39100       |          | Office Equipment and Furniture - General                                   |        | (1,198)              | 358,448             | 357,250              |   |   |   |
| 189                 | 39200       |          | Vehicles   |        | 1,109,493            | 74,390              | 1,183,884            |   |   |   |
| 190                 | 39300       |          | Stores Equipment   |        | 5,122                | 745                 | 5,867                |   |   |   |
| 191                 | 39400       |          | Tools, Implements and Garage Equipment                                     |        | 329,150              | 1,061,724           | 1,390,874            |   |   |   |
| 192                 | 39500/39510 |          | General Laboratory & Power Quality Equipment                               |        | 4,732                | 11,980              | 16,711               |   |   |   |
| 193                 | 39600       |          | Power Operated Equipment and Accessories                                   |        | 100,628              | (58,323)            | 42,305               |   |   |   |
| 194                 | 39700/39710 |          | Telephones, Radios, Fiber and Miscellaneous Communication Equipment        |        | 939,475              | (138,035)           | 801,440              |   |   |   |
| 195                 | 39800       |          | Miscellaneous Utility Equipment, Apparatus, Etc.                           |        | 48,003               | 30,830              | 78,832               |   |   |   |
| 196                 | 39900       |          | Other Tangible Utility Property  |        | 3,366                | -                   | 3,366                |   |   |   |
| 197                 |             |          | Total General  |        | \$ 5,471,219         | \$ 1,405,667        | \$ 6,876,886         |   |   |   |
| 198                 |             |          | <b>TOTAL NET PLANT</b>   |        | <b>\$ 56,101,782</b> | <b>\$ (444,460)</b> | <b>\$ 55,657,321</b> |   |   |   |

## Revenue Requirement Calculation - LAT WP-3

| Line No. | A<br>Description                                 | B<br>Source | C<br>Test Year Actual<br>Results | D<br>Adjustments | E<br>Adj No | F<br>Adjusted Test Year |
|----------|--|-------------|----------------------------------|------------------|-------------|-------------------------|
| 1        | <b>Operating Expenses</b>                        |             |                                  |                  |             |                         |
| 2        | Purchased Power                                  | WP 1        | \$ 63,003,797                    | \$ 405,349       | (1)         | \$ 63,409,146           |
| 3        | Transmission & Distribution                      | WP 1        | 4,041,025                        | 260,390          | (2)         | 4,301,415               |
| 4        | Customer Accounts & Service                      | WP 1        | 1,335,814                        | 46,088           | (2)(3)(4)   | 1,381,902               |
| 5        | Administrative & General                         | WP 1        | 6,803,207                        | 123,070          | (2)(5)(6)   | 6,926,277               |
| 6        | Subtotal O&M Expenses                            |             | \$ 75,183,843                    | \$ 834,897       |             | \$ 76,018,740           |
| 7        | Depreciation & Amortization                      | WP 1        | \$ 4,584,845                     | \$ 2,151,151     | (7)(8)      | \$ 6,735,996            |
| 8        | Gross Receipts and Other Taxes                   | WP 1        | 1,108,142                        | 110,231          | (9)         | 1,218,373               |
| 9        | Payroll Taxes - FICA                             | WP 1        | 448,690                          | 53,389           | (10)        | 502,078                 |
| 10       | Payment to City in Lieu of Taxes                 | WP 1        | 777,792                          | -                |             | 777,792                 |
| 11       | Total Operating Expenses                         |             | \$ 82,103,312                    | \$ 3,149,668     |             | \$ 85,252,980           |
| 12       | <b>Other Operating Revenues</b>                  | WP 1        | \$ (1,031,274)                   | \$ -             |             | \$ (1,031,274)          |
| 13       | <b>Other Non-Operating Revenues</b>              |             | \$ (156,713)                     | 50,756           | (11)(12)    | \$ (105,957)            |
| 14       | <b>Other Deductions</b>                          |             |                                  |                  |             |                         |
| 15       | Environmental Remediation                        | WP 1        | \$ 631,877                       | \$ (631,877)     | (13)        | \$ -                    |
| 16       | Int Expense-Consumer Deposits                    | WP 1        | 6,868                            | -                |             | 6,868                   |
| 17       | Total Other Deductions                           |             | \$ 638,745                       | \$ (631,877)     |             | \$ 6,868                |
| 18       | <b>Return on Rate Base</b>                       | WP 1        | \$ (974,486)                     | \$ 5,305,073     | (14)        | \$ 4,330,587            |
| 19       | <b>Total Revenue Requirement from Rates</b>      |             | \$ 80,579,584                    | \$ 7,873,620     |             | \$ 88,453,204           |
| 20       | <b>Electric Sales Revenues at Existing Rates</b> | WP 1        | \$ 80,579,584                    | \$ 137,772       | (15)(16)    | \$ 80,717,356           |
| 21       | <b>Rate Base</b>                                 | WP 17       | \$ 66,054,623                    | \$ (340,098)     |             | \$ 65,714,525           |
| 22       | <b>% Return on Rate Base</b>                     |             | -1.48%                           |                  |             | 6.59%                   |

## Test Year Actual and Adjusted Test Year Net Income LAT WP-4

| Line No. | A<br>Description                 | B<br>Source | C<br>Test Year Actual<br>Results | D<br>Adjustments    | E<br>Adj No  | F<br>Adjusted Test Year |
|----------|----------------------------------|-------------|----------------------------------|---------------------|--------------|-------------------------|
| 1        | <b>Operating Revenues</b>        |             |                                  |                     |              |                         |
| 2        | Electric Sales Revenues          | WP 5        | \$ 80,579,584                    | \$ 7,873,620        | (14)(15)(16) | \$ 88,453,204           |
| 3        | Other Operating Revenues         | WP 5        | 1,031,274                        | -                   |              | 1,031,274               |
| 4        | Total Operating Revenues         |             | <u>\$ 81,610,858</u>             | <u>\$ 7,873,620</u> |              | <u>\$ 89,484,478</u>    |
| 5        | <b>Operating Expenses</b>        |             |                                  |                     |              |                         |
| 6        | Purchased Power                  | WP 5        | \$ 63,003,797                    | \$ 405,349          | (1)          | \$ 63,409,146           |
| 7        | Transmission & Distribution      | WP 5        | 4,041,025                        | 260,390             | (2)          | 4,301,415               |
| 8        | Customer Accounts & Service      | WP 5        | 1,335,814                        | 46,088              | (2)(3)(4)    | 1,381,902               |
| 9        | Administrative & General         | WP 5        | 6,803,207                        | 123,070             | (2)(5)(6)    | 6,926,277               |
| 10       | Subtotal O&M Expenses            |             | <u>\$ 75,183,843</u>             | <u>\$ 834,897</u>   |              | <u>\$ 76,018,740</u>    |
| 11       | Depreciation & Amortization      | WP 5        | \$ 4,584,845                     | \$ 2,151,151        | (7)(8)       | \$ 6,735,996            |
| 12       | Gross Receipts Taxes             | WP 5        | 1,108,142                        | 110,231             | (9)          | 1,218,373               |
| 13       | Payroll Taxes - FICA             | WP 5        | 448,690                          | 53,389              | (10)         | 502,078                 |
| 14       | Payment to City in Lieu of Taxes | WP 5        | 777,792                          | -                   |              | 777,792                 |
| 15       | Total Operating Expenses         |             | <u>\$ 82,103,312</u>             | <u>\$ 3,149,668</u> |              | <u>\$ 85,252,980</u>    |
| 16       | <b>Net Operating Income</b>      |             | <u>\$ (492,454)</u>              | <u>\$ 4,723,952</u> |              | <u>\$ 4,231,498</u>     |
| 17       | <b>Other Income</b>              | WP 5        | \$ 156,713                       | (50,756)            | (11)(12)     | \$ 105,957              |
| 18       | <b>Other Deductions</b>          |             |                                  |                     |              |                         |
| 19       | Environmental Remediation        | WP 5        | \$ 631,877                       | \$ (631,877)        | (13)         | \$ -                    |
| 20       | Int Expense-Consumer Deposits    | WP 5        | 6,868                            | -                   |              | 6,868                   |
| 21       | Total Other Deductions           | WP 5        | <u>\$ 638,745</u>                | <u>\$ (631,877)</u> |              | <u>\$ 6,868</u>         |
| 22       | <b>Net Income</b>                |             | <u>\$ (974,486)</u>              | <u>\$ 5,305,073</u> |              | <u>\$ 4,330,587</u>     |

## Summary of Test Year Revenue Requirement Adjustments LAT WP-5

### Adjustment No. 1 Change in IMPA Purchased Power Costs

IMPA purchased power expenses were adjusted to account for projected changes in IMPA demand and energy rates for the last quarter of 2019 and the first quarter of 2020 and anticipated increases in sales to a large customer for the last quarter of 2019 and the first three quarters of 2020.

| Line No. | Source    | A | B<br>Account No. | C<br>Description                                     | D<br>Test Year Actual | E<br>Adjustments | F<br>Adjusted Test Year |
|----------|-----------|---|------------------|--|-----------------------|------------------|-------------------------|
| 1        |           |   |                  | IMPA Billing Determinants                            |                       |                  |                         |
| 2        | WP 7      |   |                  | CP Demand Billing Determinants                       | 1,684,735             | 6,520            | 1,691,255               |
| 3        | WP 7      |   |                  | Energy Billing Determinants                          | 929,996,458           | 4,833,974        | 934,830,432             |
| 4        |           |   |                  | IMPA Rates   |                       |                  |                         |
| 5        | WP 7      |   |                  | Base Demand Charge \$/kW                             | \$ 24.437             |                  | \$ 22.785               |
| 6        | WP 7      |   |                  | ECA Demand Charge \$/kW                              | \$ (2.086)            |                  | na                      |
| 7        | WP 7      |   |                  | Base Energy Charge \$/kWh                            | \$ 0.031044           |                  | \$ 0.026608             |
| 8        | WP 7      |   |                  | ECA Energy Charge \$/kWh                             | \$ (0.003787)         |                  | na                      |
| 9        |           |   |                  | IMPA Charges   |                       |                  |                         |
| 10       |           |   | 55500            | Demand   | \$ 37,655,205         | \$ 880,005       | \$ 38,535,210           |
| 11       |           |   | 55500            | Energy   | 25,348,592            | (474,656)        | 24,873,936              |
| 12       |           |   |                  | Total  | \$ 63,003,797         | \$ 405,349       | \$ 63,409,146           |
| 13       |           |   |                  | Large Cust. Billing Determinants                     |                       |                  |                         |
| 14       |           |   |                  | CP Demand Billing Determinants                       | 29,958                | 7,179            | 37,137                  |
| 15       |           |   |                  | Energy Billing Determinants                          | 17,192,000            | 4,771,429        | 21,963,429              |
| 16       |           |   |                  | Large Cust. Billing Determinants Adjusted for Losses |                       |                  |                         |
| 17       | COS Study |   |                  | Loss %   | 1.48%                 |                  | 1.48%                   |
| 18       |           |   |                  | CP Demand Billing Determinants                       | 30,402                | 7,285            | 37,687                  |
| 19       |           |   |                  | Energy Billing Determinants                          | 17,446,608            | 4,842,092        | 22,288,700              |

### Adjustment No. 2 Change in Labor Costs

Labor expenses were adjusted to represent projected labor expense for the last quarter of 2019 and first three quarters of 2020.

| Line No. | Source | A | B<br>Account No. | C<br>Description                        | D<br>Test Year | E<br>Budget 2020 | F<br>Difference | G<br>Adjustment | H<br>Adjusted Test Year |
|----------|--------|---|------------------|---|----------------|------------------|-----------------|-----------------|-------------------------|
| 1        | WP 8   |   | 58000-58800      | Transmission & Distribution Operation   | \$ 1,284,601   | \$ 1,292,814     | \$ 8,213        | \$ 6,159        | \$ 1,290,761            |
| 2        | WP 8   |   | 59000-59800      | Transmission & Distribution Maintenance | 1,781,595      | 2,120,570        | 338,975         | 254,231         | 2,035,826               |
| 3        | WP 8   |   | 90200-91610      | Customer Accounts & Service             | 699,448        | 744,022          | 44,574          | 33,431          | 732,878                 |
| 4        | WP 8   |   | 92000-93300      | Administrative and General              | 1,724,799      | 1,671,919        | (52,880)        | (39,660)        | 1,685,139               |
| 5        |        |   |                  | Total Labor Expenses                    | \$ 5,490,443   | \$ 5,829,325     | \$ 338,882      | \$ 254,161      | \$ 5,744,605            |

### Adjustment No. 3 Removal of Advertising Expenses

Advertising expenses were removed from the revenue requirement.

| Line No. | Source | A | B<br>Account No. | C<br>Description     | D<br>Test Year | E<br>Adjustments | F<br>Adjusted Test Year |
|----------|--------|---|------------------|----------------------|----------------|------------------|-------------------------|
| 1        | WP 1   |   | 91100            | Inform Advertise Exp | \$ 17,116.83   | \$ (17,116.83)   | \$ -                    |

### Adjustment No. 4 Uncollectibles Adjustment

Uncollectibles expenses were adjusted to account for increased uncollectibles resulting from the proposed rate increase.

| Line No. | Source | A | B<br>Account No. | C<br>Description | D<br>Test Year | E<br>Adjustments | F<br>Adjusted Test Year |
|----------|--------|---|------------------|------------------|----------------|------------------|-------------------------|
| 1        | WP 1   |   | 44010-44500      | Sales Revenue    | \$ 80,579,584  | \$ 7,873,620     | \$ 88,453,204           |
| 2        | WP 1   |   | 90400            | Uncollectibles   | \$ 304,708     | \$ 29,774        | \$ 334,482              |
| 3        |        |   |                  | Uncollectibles % | 0.378%         | 0.378%           | 0.378%                  |

### Adjustment No. 5 Amortized Rate Case Expense

Estimated rate case expenses were amortized over five years and the amortized amount was added to the revenue requirement.

| Line No. | Source | A | B<br>Account No. | C<br>Description             | D<br>Test Year | E<br>Adjustments | F<br>Adjusted Test Year |
|----------|--------|---|------------------|------------------------------|----------------|------------------|-------------------------|
| 1        |        |   | 92300            | Estimated Rate Case Expense  | \$ -           | \$ 250,000       | \$ 250,000              |
| 2        |        |   |                  | Amortization Period in Years |                |                  | 5                       |
| 3        |        |   |                  | Amortized Rate Case Expense  |                |                  | \$ 50,000               |

### Adjustment No. 6 Change in Employee Benefits

Employee benefits expenses were adjusted to account for the increased labor expenses in Adjustment No. 2.

| Line No. | Source     | A | B<br>Account No. | C<br>Description                       | D<br>Test Year | E<br>Budget 2020 | F<br>Ave % of Labor Exp | G<br>Adjustment | H<br>Adjusted Test Year |
|----------|------------|---|------------------|--|----------------|------------------|-------------------------|-----------------|-------------------------|
| 1        | WP 1, WP 8 |   | 92600            | Empl Benefits-General                  | \$ 26,785      | \$ 30,835        | 0.5%                    | \$ 3,087        | \$ 29,872               |
| 2        | WP 1, WP 8 |   | 92610            | Empl Benefits-Pension                  | 2,192,884      | 2,166,061        | 37.9%                   | (18,551)        | 2,174,333               |
| 3        | WP 1, WP 8 |   | 92615            | Employee Benefit - Defined Contributiv | 79,585         | 111,000          | 1.8%                    | 23,244          | 102,828                 |
| 4        | WP 1, WP 8 |   | 92620            | Empl Benefits-Health Ins               | 1,403,026      | 1,566,000        | 26.5%                   | 121,592         | 1,524,618               |
| 5        | WP 1, WP 8 |   | 92621            | Empl Benefits-Life Ins                 | 11,468         | 12,000           | 0.2%                    | 596             | 12,064                  |
| 6        | WP 1, WP 8 |   | 92622            | Empl Benefits-Disability Ins           | 14,161         | 17,000           | 0.3%                    | 1,924           | 16,085                  |
| 7        | WP 1, WP 8 |   | 92630            | Empl Benefits-Recreation               | -              | -                | 0.0%                    | -               | -                       |
| 8        | WP 1, WP 8 |   | 92640            | Empl Benefits-Educator Assist          | 1,908          | 10,000           | 0.1%                    | 6,134           | 8,042                   |
| 9        | WP 1, WP 8 |   | 92695            | Vacation Earned                        | 34,628         | -                | 0.2%                    | (25,436)        | 9,191                   |
|          |            |   | Total            |  | \$ 3,764,443   | \$ 3,912,896     |                         | \$ 112,590      | \$ 3,877,034            |

### Adjustment No. 7 Change in Depreciation Expenses

## Summary of Test Year Revenue Requirement Adjustments LAT WP-5

Depreciation expenses were adjusted to account for changes in rate base per Adjustment No. 14.

| Line No. | A<br>Source | B<br>Account No. | C<br>Description         | D<br>Test Year | E<br>Adjustments | F<br>Adjusted Test Year |
|----------|-------------|------------------|--------------------------|----------------|------------------|-------------------------|
|          |             |                  | Plant In Service         |                |                  |                         |
| 1        | WP 2        | 31000-34600      | Production               | \$ 53,095,746  | \$ -             | \$ 53,095,746           |
| 2        | WP 2        | 35000-35900      | Transmission             | 28,870,554     | 78,063           | 28,948,617              |
| 3        | WP 2        | 36000-37320      | Distribution             | 83,667,470     | 1,355,042        | 85,022,512              |
| 4        | WP 2        | 38900-39900      | General                  | 25,871,184     | 839,512          | 26,710,695              |
| 5        |             |                  | Total                    | \$ 191,504,954 | \$ 2,272,617     | \$ 193,777,571          |
|          |             |                  | Depreciation Expense     |                |                  |                         |
| 6        | WP 2        | 40300            | Production               | \$ 900,064     | \$ (487,475)     | \$ 412,589              |
| 7        | WP 2        | 40300            | Transmission             | 824,559        | 2,973            | 827,531                 |
| 8        | WP 2        | 40300            | Distribution             | 2,000,586      | 18,830           | 2,019,416               |
| 9        | WP 2        | 40300            | General                  | 859,636        | (63,176)         | 796,460                 |
| 10       |             |                  | Total                    | \$ 4,584,845   | \$ (528,849)     | \$ 4,055,996            |
|          |             |                  | Annual Depreciation Rate |                |                  |                         |
| 11       |             |                  | Production               | 1.7%           |                  | 0.8%                    |
| 12       |             |                  | Transmission             | 2.9%           |                  | 2.9%                    |
| 13       |             |                  | Distribution             | 2.4%           |                  | 2.4%                    |
| 14       |             |                  | General                  | 3.3%           |                  | 3.0%                    |
| 15       |             |                  | Total                    | 2.4%           |                  | 2.1%                    |

### Adjustment No. 8 Amortization of Environmental Remediation Liability

Environmental remediation liability costs associated with the Whitewater Valley Generating Station were amortized over five years and added to the revenue requirement.

| Line No. | A<br>Source | B<br>Account No. | C<br>Description                  | D | E | F<br>Adjusted Test Year |
|----------|-------------|------------------|-----------------------------------|---|---|-------------------------|
| 1        | WP 22       | 24208            | Env Remediation Liability 2019\$  |   |   | \$ 12,370,846           |
| 2        |             |                  | Amortization Period in Years      |   |   | 5.0                     |
| 3        |             |                  | Annual Inflation Rate             |   |   | 2%                      |
| 4        |             |                  | Average Balance Over Amort Period |   |   | \$ 13,401,105           |
| 5        |             |                  | Average Amortization Expense      |   |   | \$ 2,680,000            |

### Adjustment No. 9 Change in FICA-Related Taxes

FICA tax expenses were adjusted to account for the increased labor expenses in Adjustment No. 2.

| Line No. | A<br>Source | B<br>Account No. | C<br>Description       | D<br>Test Year | E<br>Budget 2020 | F<br>Adjustments | G<br>Adjusted Test Year |
|----------|-------------|------------------|------------------------|----------------|------------------|------------------|-------------------------|
| 1        | WP 8        |                  | Labor Expenses         | \$ 5,490,443   | \$ 5,829,325     | \$ 5,744,605     | \$ 5,744,605            |
| 2        |             | 40812            | Tax Exp-Fica           | 448,690        | 520,442          | \$ 53,389        | 502,078                 |
| 3        |             |                  | Ave % of Labor Expense | 8.2%           | 8.9%             | 8.7%             | 8.7%                    |

### Adjustment No. 10 Utility Receipts Tax Adjustment

Utility receipt taxes were adjusted to account for increased tax expenses resulting from the proposed rate increase.

| Line No. | A<br>Source | B<br>Account No. | C<br>Description        | D<br>Test Year | E<br>Adjustments | F<br>Adjusted Test Year |
|----------|-------------|------------------|-------------------------|----------------|------------------|-------------------------|
| 1        | WP 1        | 44010-44500      | Sales Revenue           | \$ 80,579,584  | \$ 7,873,620     | \$ 88,453,204           |
| 2        | WP 1        | 40811            | Utilities Receipt Tax   | \$ 1,108,142   | \$ 110,231       | \$ 1,218,373            |
| 3        |             |                  | Utilities Receipt Tax % | 1.38%          | 1.400%           | 1.38%                   |

### Adjustment No. 11 Removal of Interest Income on Bond Reserve

Interest income from the bond reserve fund was removed from the revenue requirement because the bond reserve fund no longer exists.

| Line No. | A<br>Source | B<br>Account No. | C<br>Description        | D<br>Test Year | E<br>Adjustments | F<br>Adjusted Test Year |
|----------|-------------|------------------|-------------------------|----------------|------------------|-------------------------|
| 1        | WP 1        | 41940            | Int Income-Bond Reserve | \$ 445         | \$ (445)         | \$ -                    |

### Adjustment No. 12 Removal of Parallax Interest Income

Interest income from Parallax was removed from the revenue requirement because Parallax is a non-electric department of RP&L.

| Line No. | A<br>Source | B<br>Account No. | C<br>Description    | D<br>Test Year | E<br>Adjustments | F<br>Adjusted Test Year |
|----------|-------------|------------------|---------------------|----------------|------------------|-------------------------|
| 1        | WP 1        | 41995            | Int Income-Parallax | \$ 50,311      | \$ (50,311)      | \$ -                    |

### Adjustment No. 13 Removal of Environmental Remediation Expenses

Environmental remediation expenses were removed from the revenue requirement because of the addition of amortized environmental remediation costs in Adjustment No. 8 to the revenue requirement.

| Line No. | A<br>Source | B<br>Account No. | C<br>Description          | D<br>Test Year | E<br>Adjustments | F<br>Adjusted Test Year |
|----------|-------------|------------------|---------------------------|----------------|------------------|-------------------------|
| 1        | WP 1        | 42655            | Environmental Remediation | \$ 631,877     | \$ (631,877)     | \$ -                    |

### Adjustment No. 14 Change in Return on Rate Base

The return on rate base was adjusted such that a rate of return equal to 6.59% is achieved.

| Line No. | A<br>Source | B<br>Account No. | C<br>Description | D<br>Test Year | E<br>Adjustments | F<br>Adjusted Test Year |
|----------|-------------|------------------|------------------|----------------|------------------|-------------------------|
| 1        |             |                  | Rate Base        | \$ 66,054,623  | \$ (340,098)     | \$ 65,714,525           |
| 2        |             |                  | Rate of Return   | -1.48%         |                  | 6.59%                   |



Summary of Test Year Revenue Requirement Adjustments LAT WP-5

3 Return \$ (974,486) \$ 5,305,073 \$ 4,330,587

Adjustment No. 15 Change in Revenues from Large Cust Load Increase

An adjustment to rate revenues was made to account for anticipated increases in sales to a large customer for the last quarter of 2019 and the first three quarters of 2020.

| Line No. | Source | A | B           | C                                | D            | E           | F                  |
|----------|--------|---|-------------|----------------------------------|--------------|-------------|--------------------|
|          |        |   | Account No. | Description                      | Test Year    | Adjustments | Adjusted Test Year |
| 1        |        |   |             | Billing Determinants             |              |             |                    |
| 2        | WP 20  |   |             | Demand kW-Coin                   |              |             |                    |
| 3        | WP 20  |   |             | Demand kVA                       |              |             |                    |
| 4        | WP 20  |   |             | Energy kWh                       |              |             |                    |
| 5        | WP 20  |   |             | Demand kW-Coin Adj for Power Fac |              |             |                    |
| 6        | WP 20  |   |             | Rates                            |              |             |                    |
| 7        | WP 20  |   |             | Demand \$/kW-Coin                | \$ 7.77      |             | \$ 7.77            |
| 8        | WP 20  |   |             | Trans & Dist \$/kVA              | \$ 2.50      |             | \$ 2.50            |
| 9        | WP 20  |   |             | Energy \$/kWh                    | \$ 0.02437   |             | \$ 0.02437         |
| 10       | WP 20  |   |             | Primary Metering Disc            | 2%           |             | 2%                 |
| 11       | WP 20  |   |             | ECA Demand \$/kW-Coin            | \$ 14.652514 |             | \$ 14.742340       |
| 12       | WP 20  |   |             | ECA Energy Rate \$/kWh           | \$ 0.011201  |             | \$ 0.011175        |
| 13       |        |   |             | Base Rate Revenues               |              |             |                    |
| 14       |        |   | 44280       | Demand                           |              |             |                    |
| 15       |        |   | 44280       | Trans & Dist                     |              |             |                    |
| 16       |        |   | 44280       | Energy                           |              |             |                    |
| 17       |        |   |             | Total                            |              |             |                    |
| 18       |        |   |             | ECA Revenues                     |              |             |                    |
| 19       |        |   | 44280       | Demand                           |              |             |                    |
| 20       |        |   | 44280       | Energy                           |              |             |                    |
| 21       |        |   |             | Total                            |              |             |                    |
| 22       |        |   |             | Total                            |              | \$ 356,111  |                    |

Adjustment No. 16 Change in Revenues from Moving Large Cust to Different Class

An adjustment to rate revenues was made to account for the anticipated migration of a large customer from one rate class to another.

| Line No. | Source | A | B           | C                          | D            | E            | F                  |
|----------|--------|---|-------------|----------------------------|--------------|--------------|--------------------|
|          |        |   | Account No. | Description                | Test Year    | Adjustments  | Adjusted Test Year |
| 1        |        |   |             | Billing Determinants       |              |              |                    |
| 2        | WP 21  |   |             | Demand kW-Coin             |              |              |                    |
| 3        | WP 21  |   |             | Demand kVA                 |              |              |                    |
| 4        | WP 21  |   |             | Energy kWh                 |              |              |                    |
| 5        |        |   |             | Rates                      |              |              |                    |
| 6        | WP 21  |   |             | Demand \$/kW-Coin          | \$ 7.77      |              | na                 |
| 7        | WP 21  |   |             | Demand \$/kVA              | na           |              | \$ 8.67            |
| 8        | WP 21  |   |             | Trans & Dist \$/kVA        | \$ 2.50      |              | na                 |
| 9        | WP 21  |   |             | Substation Discount \$/kVA | \$ (0.35)    |              | -                  |
| 10       | WP 21  |   |             | Energy \$/kWh              | \$ 0.02437   |              | \$ 0.02437         |
| 11       | WP 21  |   |             | ECA Demand \$/kW-Coin      | \$ 14.750133 |              | na                 |
| 12       | WP 21  |   |             | ECA Demand \$/kVA          | na           |              | \$ 12.527036       |
| 13       | WP 21  |   |             | ECA Energy Rate \$/kWh     | \$ 0.011172  |              | \$ 0.011172        |
| 14       |        |   |             | Base Rate Revenues         |              |              |                    |
| 15       |        |   | 44270-44280 | Demand                     |              |              |                    |
| 16       |        |   | 44270-44280 | Trans & Dist               |              |              |                    |
| 17       |        |   | 44270-44280 | Energy                     |              |              |                    |
| 18       |        |   |             | Total                      |              |              |                    |
| 19       |        |   |             | ECA Revenues               |              |              |                    |
| 20       |        |   | 44270-44280 | Demand                     |              |              |                    |
| 21       |        |   | 44270-44280 | Energy                     |              |              |                    |
| 22       |        |   |             | Total                      |              |              |                    |
| 23       |        |   |             | Total                      |              | \$ (235,261) |                    |

Projected FY2020 Budgeted IMPA Power Supply Costs LAT WP-6

|  | A        | B                 | C             | D           | E              | F  | G                | H                | I              | J      | K         | L                | M         | N |
|--|----------|-------------------|---------------|-------------|----------------|--|------------------|------------------|----------------|--------|-----------|------------------|-----------|---|
| ESTIMATED PURCHASED POWER SALES AND CHARGES BY MONTH<br>(based on IMPA's Projection of Load for each Member) |          |                   |               |             |                |  |                  |                  |                |        |           |                  |           |   |
| Line No.   | Richmond |                   |               |             |                | IMPA 2019 Wholesale Rate Components with ECA |                  |                  | ECA Charges    |        | Projected |                  | Average   |   |
|  | Month    | Source            | Billing Units |             | Load           | Demand                                       | Energy           | Primary          | Demand         | Energy | Bill      | Totals           | Cost      |   |
|  |          |                   | kW            | kWh         | Prim. Volt. kW | Factor                                       | Charges          | Charge           | Voltage Charge |        |           |                  | Cents/kWh |   |
| 1  |          |                   |               |             |                |  | \$ 22.957        | \$ 0.026390      | \$ 1.176       | \$ -   | \$ -      |                  |           |   |
| 2  | Jan      | Source Document 1 | 147,185       | 86,185,465  | -              | 76.0%  | \$ 3,378,926.05  | \$ 2,274,434.42  | \$ -           | \$ -   | \$ -      | \$ 5,653,360.47  | 6.560     |   |
| 3  | Feb      | Source Document 1 | 139,737       | 78,577,668  | -              | 78.0%  | \$ 3,207,942.31  | \$ 2,073,664.65  | \$ -           | \$ -   | \$ -      | \$ 5,281,606.96  | 6.722     |   |
| 4  | Mar      | Source Document 1 | 128,101       | 80,798,755  | -              | 81.9%  | \$ 2,940,814.66  | \$ 2,132,279.15  | \$ -           | \$ -   | \$ -      | \$ 5,073,093.81  | 6.279     |   |
| 5  | Apr      | Source Document 1 | 129,154       | 73,238,037  | -              | 76.1%  | \$ 2,964,988.38  | \$ 1,932,751.80  | \$ -           | \$ -   | \$ -      | \$ 4,897,740.18  | 6.687     |   |
| 6  | May      | Source Document 1 | 132,271       | 73,084,334  | -              | 71.7%  | \$ 3,036,545.35  | \$ 1,928,695.56  | \$ -           | \$ -   | \$ -      | \$ 4,965,240.91  | 6.794     |   |
| 7  | Jun      | Source Document 1 | 144,178       | 75,227,301  | -              | 70.0%  | \$ 3,309,894.35  | \$ 1,985,248.48  | \$ -           | \$ -   | \$ -      | \$ 5,295,142.82  | 7.039     |   |
| 8  | Jul      | Source Document 1 | 145,089       | 81,049,801  | -              | 72.5%  | \$ 3,330,808.17  | \$ 2,138,904.26  | \$ -           | \$ -   | \$ -      | \$ 5,469,712.43  | 6.749     |   |
| 9  | Aug      | Source Document 1 | 144,717       | 81,326,484  | -              | 72.9%  | \$ 3,322,268.17  | \$ 2,146,205.90  | \$ -           | \$ -   | \$ -      | \$ 5,468,474.07  | 6.724     |   |
| 10   | Sep      | Source Document 1 | 139,330       | 71,065,487  | -              | 68.4%  | \$ 3,198,598.81  | \$ 1,875,418.19  | \$ -           | \$ -   | \$ -      | \$ 5,074,017.00  | 7.140     |   |
| 11   | Oct      | Source Document 1 | 131,151       | 73,898,253  | -              | 73.1%  | \$ 3,010,833.51  | \$ 1,950,174.90  | \$ -           | \$ -   | \$ -      | \$ 4,961,008.41  | 6.713     |   |
| 12   | Nov      | Source Document 1 | 126,701       | 74,792,322  | -              | 79.2%  | \$ 2,908,674.86  | \$ 1,973,769.39  | \$ -           | \$ -   | \$ -      | \$ 4,882,444.24  | 6.528     |   |
| 13   | Dec      | Source Document 1 | 133,357       | 80,755,270  | -              | 78.6%  | \$ 3,061,476.65  | \$ 2,131,131.57  | \$ -           | \$ -   | \$ -      | \$ 5,192,608.22  | 6.430     |   |
| 14   | Total    |                   | 1,613,448     | 924,028,528 |                | 78.5%  | \$ 37,671,771.25 | \$ 24,542,678.27 | \$ -           | \$ -   | \$ -      | \$ 62,214,449.51 | 6.733     |   |

## IMPA Test Year Power Supply Cost Normalization LAT WP-7

| Line No.                      | A                               | B                     | C                       | D                | E                        | F                       | G                             | H                            | I                                |
|-------------------------------|---------------------------------|-----------------------|-------------------------|------------------|--------------------------|-------------------------|-------------------------------|------------------------------|----------------------------------|
| <b>IMPA Bills to RP&amp;L</b> |                                 |                       |                         |                  |                          |                         |                               |                              |                                  |
| 1                             | Billing Period                  | Source                | RP&L CP<br>Demand<br>kW | RP&L kWh         | Base<br>Demand<br>Charge | ECA<br>Demand<br>Charge | RP&L Base<br>Energy<br>Charge | RP&L ECA<br>Energy<br>Charge | Total RP&L<br>Bills from<br>IMPA |
| 2                             | <b>Test Year</b>                |                       |                         |                  |                          |                         |                               |                              |                                  |
| 3                             | Oct-18                          | Source Docs 2 thru 13 | 140,355                 | 76,299,912       | \$ 23.614                | \$ (0.939)              | \$ 0.031875                   | \$ (0.004650)                | \$ 5,259,815                     |
| 4                             | Nov-18                          | Source Docs 2 thru 13 | 132,395                 | 75,230,508       | \$ 23.614                | \$ (0.939)              | \$ 0.031875                   | \$ (0.004650)                | \$ 5,050,207                     |
| 5                             | Dec-18                          | Source Docs 2 thru 13 | 132,920                 | 77,556,173       | \$ 23.614                | \$ (0.939)              | \$ 0.031875                   | \$ (0.004650)                | \$ 5,125,428                     |
| 6                             | Jan-19                          | Source Docs 2 thru 13 | 150,541                 | 85,111,405       | \$ 24.698                | \$ (2.450)              | \$ 0.030772                   | \$ (0.003505)                | \$ 5,669,969                     |
| 7                             | Feb-19                          | Source Docs 2 thru 13 | 139,737                 | 75,705,245       | \$ 24.698                | \$ (2.450)              | \$ 0.030772                   | \$ (0.003505)                | \$ 5,173,124                     |
| 8                             | Mar-19                          | Source Docs 2 thru 13 | 137,350                 | 79,918,738       | \$ 24.698                | \$ (2.450)              | \$ 0.030772                   | \$ (0.003505)                | \$ 5,234,907                     |
| 9                             | Apr-19                          | Source Docs 2 thru 13 | 127,681                 | 69,959,086       | \$ 24.698                | \$ (2.450)              | \$ 0.030772                   | \$ (0.003505)                | \$ 4,748,221                     |
| 10                            | May-19                          | Source Docs 2 thru 13 | 134,865                 | 72,122,341       | \$ 24.698                | \$ (2.450)              | \$ 0.030772                   | \$ (0.003505)                | \$ 4,967,036                     |
| 11                            | Jun-19                          | Source Docs 2 thru 13 | 147,823                 | 75,080,792       | \$ 24.698                | \$ (2.450)              | \$ 0.030772                   | \$ (0.003505)                | \$ 5,335,994                     |
| 12                            | Jul-19                          | Source Docs 2 thru 13 | 145,515                 | 84,505,627       | \$ 24.698                | \$ (2.450)              | \$ 0.030772                   | \$ (0.003505)                | \$ 5,541,633                     |
| 13                            | Aug-19                          | Source Docs 2 thru 13 | 143,745                 | 80,992,851       | \$ 24.698                | \$ (2.450)              | \$ 0.030772                   | \$ (0.003505)                | \$ 5,406,471                     |
| 14                            | Sep-19                          | Source Docs 2 thru 13 | 151,808                 | 77,513,780       | \$ 24.698                | \$ (2.450)              | \$ 0.030772                   | \$ (0.003505)                | \$ 5,490,993                     |
| 15                            | <b>Total Test Year</b>          |                       | 1,684,735               | 929,996,458      | \$ 24.437                | \$ (2.086)              | \$ 0.031044                   | \$ (0.003787)                | \$ 63,003,797                    |
| 16                            |                                 |                       |                         |                  |                          |                         |                               |                              |                                  |
| 17                            | <b>Adjusted Test Year</b>       |                       |                         |                  |                          |                         |                               |                              |                                  |
| 18                            | Oct-18                          |                       | 142,421                 | 77,461,358       | \$ 22.248                | \$ -                    | \$ 0.027267                   | \$ -                         | \$ 5,280,714                     |
| 19                            | Nov-18                          |                       | 134,173                 | 76,403,294       | \$ 22.248                | \$ -                    | \$ 0.027267                   | \$ -                         | \$ 5,068,360                     |
| 20                            | Dec-18                          |                       | 133,755                 | 78,473,804       | \$ 22.248                | \$ -                    | \$ 0.027267                   | \$ -                         | \$ 5,115,519                     |
| 21                            | Jan-19                          |                       | 151,479                 | 85,968,804       | \$ 22.957                | \$ -                    | \$ 0.026390                   | \$ -                         | \$ 5,746,215                     |
| 22                            | Feb-19                          |                       | 140,642                 | 76,429,958       | \$ 22.957                | \$ -                    | \$ 0.026390                   | \$ -                         | \$ 5,245,694                     |
| 23                            | Mar-19                          |                       | 137,350                 | 79,918,738       | \$ 22.957                | \$ -                    | \$ 0.026390                   | \$ -                         | \$ 5,262,199                     |
| 24                            | Apr-19                          |                       | 127,681                 | 69,959,086       | \$ 22.957                | \$ -                    | \$ 0.026390                   | \$ -                         | \$ 4,777,393                     |
| 25                            | May-19                          |                       | 134,865                 | 72,122,341       | \$ 22.957                | \$ -                    | \$ 0.026390                   | \$ -                         | \$ 4,999,404                     |
| 26                            | Jun-19                          |                       | 147,823                 | 75,080,792       | \$ 22.957                | \$ -                    | \$ 0.026390                   | \$ -                         | \$ 5,374,955                     |
| 27                            | Jul-19                          |                       | 145,515                 | 84,505,627       | \$ 22.957                | \$ -                    | \$ 0.026390                   | \$ -                         | \$ 5,570,691                     |
| 28                            | Aug-19                          |                       | 143,745                 | 80,992,851       | \$ 22.957                | \$ -                    | \$ 0.026390                   | \$ -                         | \$ 5,437,355                     |
| 29                            | Sep-19                          |                       | 151,808                 | 77,513,780       | \$ 22.957                | \$ -                    | \$ 0.026390                   | \$ -                         | \$ 5,530,645                     |
| 30                            | <b>Total Adjusted Test Year</b> |                       | 1,691,255               | 934,830,432      | \$ 22.785                |                         | \$ 0.026608                   |                              | \$ 63,409,146                    |
| 31                            |                                 |                       |                         |                  |                          |                         |                               |                              |                                  |
| 32                            | <b>Adjustments</b>              |                       | <b>6,520</b>            | <b>4,833,974</b> |                          |                         |                               |                              | <b>\$ 405,349</b>                |
| 31                            |                                 |                       |                         |                  |                          |                         |                               |                              |                                  |
| 33                            | <b>Losses</b>                   | COS Study             | 1.48%                   | 1.48%            |                          |                         |                               |                              |                                  |

Test Year and Adjusted Test Year Labor Expenses and Benefits LAT WP-8

| Line No. | A                     | B  | C                  | D         | E           | F          | G          | H                  |
|----------|-----------------------|--|--------------------|-----------|-------------|------------|------------|--------------------|
| 1        | Account               | Description  | Source Document    | Test Year | Budget 2020 | Difference | Adjustment | Adjusted Test Year |
|          | <b>Labor Expenses</b> |  |                    |           |             |            |            |                    |
| 2        |                       | <b>Transmission &amp; Distribution Operation</b>   |                    |           |             |            |            |                    |
| 3        | 58000                 | Supervision Of Oper-Dist                           | Source Document 14 | 734,685   | 766,970     | 32,285     | 24,214     | 758,899            |
| 4        | 58100                 | Load Dispatching-Dist                              | Source Document 14 | 88,487    | 95,844      | 7,357      | 5,518      | 94,005             |
| 5        | 58200                 | Station Exp-Dist                                   | Source Document 14 | 1,491     | -           | (1,491)    | (1,118)    | 373                |
| 6        | 58300                 | Oh Line Expense-General                            | Source Document 14 | 14,806    | -           | (14,806)   | (11,104)   | 3,701              |
| 7        | 58320                 | Oh Line Expense-Patrol-Test                        | Source Document 14 | 2,341     | 6,000       | 3,659      | 2,744      | 5,085              |
| 8        | 58330                 | Oh Line-Remove/Reset Trans                         | Source Document 14 | -         | -           | -          | -          | -                  |
| 9        | 58400                 | Ug Line Expense-General                            | Source Document 14 | 14,779    | -           | (14,779)   | (11,084)   | 3,695              |
| 10       | 58600                 | Meter Expense-General                              | Source Document 14 | 130,210   | 138,000     | 7,790      | 5,843      | 136,052            |
| 11       | 58610                 | Set & Remove Sp Meters                             | Source Document 14 | 53,177    | 25,000      | (28,177)   | (21,133)   | 32,044             |
| 12       | 58611                 | Set & Remove-Pp Meters                             | Source Document 14 | -         | -           | -          | -          | -                  |
| 13       | 58612                 | Set & Remove-Solid St Rec                          | Source Document 14 | -         | -           | -          | -          | -                  |
| 14       | 58620                 | Meter Systems Analyses                             | Source Document 14 | -         | -           | -          | -          | -                  |
| 15       | 58630                 | Meter Records                                      | Source Document 14 | 73,546    | 80,000      | 6,454      | 4,840      | 78,387             |
| 16       | 58700                 | Customer Install-General                           | Source Document 14 | 136,204   | 140,000     | 3,796      | 2,847      | 139,051            |
| 17       | 58710                 | Field Inv Of Meter Malfunc                         | Source Document 14 | -         | -           | -          | -          | -                  |
| 18       | 58720                 | Current Diversion                                  | Source Document 14 | 15,759    | 19,000      | 3,241      | 2,431      | 18,190             |
| 19       | 58800                 | Misc Dist Expense-General                          | Source Document 14 | 19,117    | 22,000      | 2,883      | 2,162      | 21,279             |
| 20       |                       | Total Distribution Operation                       |                    | 1,284,601 | 1,292,814   | 8,213      | 6,159      | 1,290,761          |
| 21       |                       | <b>Transmission &amp; Distribution Maintenance</b> |                    |           |             |            |            |                    |
| 22       | 59000                 | Supervision Of Maint-Dist                          | Source Document 14 | 171,383   | 199,753     | 28,370     | 21,278     | 192,660            |
| 23       | 59100                 | Maint Of Structures                                | Source Document 14 | 3,769     | 1,500       | (2,269)    | (1,702)    | 2,067              |
| 24       | 59110                 | Care Of Grounds-Dist                               | Source Document 14 | -         | 3,000       | 3,000      | 2,250      | 2,250              |
| 25       | 59200                 | Maint Of Station Equip-Gen                         | Source Document 14 | 544,910   | 662,986     | 118,076    | 88,557     | 633,467            |
| 26       | 59210                 | Maint Of Transf & Regulator                        | Source Document 14 | -         | -           | -          | -          | -                  |
| 27       | 59250                 | Maint Of Switchboards                              | Source Document 14 | -         | -           | -          | -          | -                  |
| 28       | 59300                 | Maint Of Oh Lines-General                          | Source Document 14 | 613,277   | 556,000     | (57,277)   | (42,958)   | 570,319            |
| 29       | 59310                 | Maint Of Oh Lines-Tree Trim                        | Source Document 14 | 143,969   | 255,200     | 111,231    | 83,423     | 227,392            |
| 30       | 59330                 | Maint Of Oh Lines-Poles & Fix                      | Source Document 14 | -         | -           | -          | -          | -                  |
| 31       | 59400                 | Maint Of Ug Lines-General                          | Source Document 14 | 118,445   | 155,000     | 36,555     | 27,416     | 145,861            |
| 32       | 59410                 | Maint Of Ug Lines-Vault & Mh                       | Source Document 14 | -         | -           | -          | -          | -                  |
| 33       | 59440                 | Maint Of Ug Lines-Ug Serv                          | Source Document 14 | -         | -           | -          | -          | -                  |
| 34       | 59450                 | Maint Of Ug Lines-Network                          | Source Document 14 | -         | -           | -          | -          | -                  |
| 35       | 59500                 | Maint Of Line Transf-Oh                            | Source Document 14 | 11,566    | 56,131      | 44,565     | 33,423     | 44,990             |
| 36       | 59520                 | Maint Of Line Transf-Ug                            | Source Document 14 | -         | -           | -          | -          | -                  |
| 37       | 59600                 | Maint Of St. Light-Pend-Gen                        | Source Document 14 | 113,923   | 150,000     | 36,077     | 27,058     | 140,981            |
| 38       | 59610                 | Maint Of St. Light-Pend-Oh Li                      | Source Document 14 | -         | -           | -          | -          | -                  |
| 39       | 59620                 | Maint Of St. Light-Pend-Col                        | Source Document 14 | -         | -           | -          | -          | -                  |
| 40       | 59640                 | Maint Of St. Light-Orn-Gen                         | Source Document 14 | -         | -           | -          | -          | -                  |
| 41       | 59680                 | Maint Of Dusk To Dawn Light                        | Source Document 14 | 39,623    | 40,000      | 377        | 283        | 39,906             |
| 42       | 59700                 | Maint Of Meters-General                            | Source Document 14 | 20,247    | 40,000      | 19,753     | 14,815     | 35,062             |
| 43       | 59800                 | Maint Of Misc Dist Plant                           | Source Document 14 | 484       | 1,000       | 516        | 387        | 871                |
| 44       |                       | Total Distribution Maintenance                     |                    | 1,781,595 | 2,120,570   | 338,975    | 254,231    | 2,035,826          |
| 45       |                       | <b>Customer Accounts &amp; Service</b>             |                    |           |             |            |            |                    |
| 46       | 90200                 | Meter Reading Expense                              | Source Document 14 | 61,344    | 55,000      | (6,344)    | (4,758)    | 56,586             |
| 47       | 90300                 | Cust Records & Collect-Gen                         | Source Document 14 | 347,889   | 371,905     | 24,016     | 18,012     | 365,901            |
| 48       | 90310                 | Cash Over And Short                                | Source Document 14 | -         | -           | -          | -          | -                  |
| 49       | 90400                 | Uncollect Accts Expense                            | Source Document 14 | -         | -           | -          | -          | -                  |
| 50       | 90600                 | Cust Serv & Informational Exp                      | Source Document 14 | -         | -           | -          | -          | -                  |
| 51       | 90800                 | Customer Assistance Expenses                       | Source Document 14 | -         | -           | -          | -          | -                  |
| 52       | 90900                 | Supv Of Customer Service                           | Source Document 14 | 129,529   | 136,000     | 6,471      | 4,853      | 134,382            |
| 53       | 91000                 | Customer Assist Exp                                | Source Document 14 | 16,835    | 8,000       | (8,835)    | (6,627)    | 10,209             |
| 54       | 91100                 | Inform Advertise Exp                               | Source Document 14 | -         | -           | -          | -          | -                  |
| 55       | 91200                 | Misc Customer Service Exp                          | Source Document 14 | 143,850   | 173,117     | 29,267     | 21,950     | 165,800            |
| 56       | 91600                 | Demonstration Exp                                  | Source Document 14 | -         | -           | -          | -          | -                  |
| 57       | 91610                 | Demo Exp-Res-Misc                                  | Source Document 14 | -         | -           | -          | -          | -                  |
| 58       |                       | Total Customer Accounts & Service                  |                    | 699,448   | 744,022     | 44,574     | 33,431     | 732,878            |
| 59       |                       | <b>Administrative and General</b>                  |                    |           |             |            |            |                    |
| 60       | 92000                 | Salaries-Gen Mgr & Staff                           | Source Document 14 | 297,597   | 307,839     | 10,242     | 7,681      | 305,279            |
| 61       | 92005                 | Salaries-Energy Services                           | Source Document 14 | -         | -           | -          | -          | -                  |
| 62       | 92010                 | Salaries-Other City Official                       | Source Document 14 | 59,387    | 61,493      | 2,106      | 1,579      | 60,967             |
| 63       | 92015                 | Salaries-Telecomm                                  | Source Document 14 | 94,245    | -           | (94,245)   | (70,684)   | 23,561             |
| 64       | 92020                 | Salaries-Engr                                      | Source Document 14 | 73,340    | 77,000      | 3,660      | 2,745      | 76,085             |
| 65       | 92030                 | Salaries-Finance & Account                         | Source Document 14 | 212,648   | 218,530     | 5,882      | 4,411      | 217,060            |
| 66       | 92035                 | Salaries-Purch And Stores                          | Source Document 14 | 189,474   | 175,671     | (13,803)   | (10,352)   | 179,122            |
| 67       | 92040                 | Salaries-Personnel                                 | Source Document 14 | 208,336   | 213,786     | 5,450      | 4,088      | 212,423            |
| 68       | 92045                 | Salaries - Summer / Intern                         | Source Document 14 | 21,016    | 25,000      | 3,984      | 2,988      | 24,004             |
| 69       | 92060                 | Salaries-Information Sys                           | Source Document 14 | 372,749   | 387,000     | 14,251     | 10,688     | 383,437            |
| 70       | 92100                 | Office Supp-Adm & Gen                              | Source Document 14 | -         | -           | -          | -          | -                  |
| 71       | 92110                 | Office Supp-Other City Offic                       | Source Document 14 | -         | -           | -          | -          | -                  |
| 72       | 92130                 | Association Membership Dues                        | Source Document 14 | -         | -           | -          | -          | -                  |
| 73       | 92135                 | APPA - Rodeo                                       | Source Document 14 | 22,327    | 25,000      | 2,673      | 2,004      | 24,332             |
| 74       | 92140                 | Computer Hardware and Support                      | Source Document 14 | -         | -           | -          | -          | -                  |
| 75       | 92145                 | Network Hardware and Maintenance                   | Source Document 14 | -         | -           | -          | -          | -                  |
| 76       | 92150                 | Computer Software and Support                      | Source Document 14 | -         | -           | -          | -          | -                  |
| 77       | 92160                 | Clothing   | Source Document 14 | -         | -           | -          | -          | -                  |
| 78       | 92170                 | Employee Empowerment Committee                     | Source Document 14 | -         | -           | -          | -          | -                  |
| 79       | 92175                 | Safety Council                                     | Source Document 14 | -         | -           | -          | -          | -                  |
| 80       | 92300                 | Outside Services Employed                          | Source Document 14 | -         | -           | -          | -          | -                  |
| 81       | 92400                 | Property Insurance                                 | Source Document 14 | -         | -           | -          | -          | -                  |
| 82       | 92500                 | Injuries & Damage-Insurance                        | Source Document 14 | -         | -           | -          | -          | -                  |
| 83       | 92520                 | Injuries & Damage-Wc                               | Source Document 14 | -         | -           | -          | -          | -                  |
| 84       | 92530                 | Injuries & Damage-Damage Se                        | Source Document 14 | -         | -           | -          | -          | -                  |

Test Year and Adjusted Test Year Labor Expenses and Benefits LAT WP-8

| Line No. | A                                 | B  | C                               | D                | E                  | F                         | G                 | H                         |
|----------|-----------------------------------|--|---------------------------------|------------------|--------------------|---------------------------|-------------------|---------------------------|
|          | Account                           | Description                                  | Source Document                 | Test Year        | Budget 2020        | Difference                | Adjustment        | Adjusted Test Year        |
| 85       | 92600                             | Empl Benefits-General                        | Source Document 14              | (51)             | -                  | 51                        | 39                | (13)                      |
| 86       | 92610                             | Empl Benefits-Pension                        | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 87       | 92615                             | Employee Benefit - Defined Contribution Plan | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 88       | 92620                             | Empl Benefits-Health Ins                     | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 89       | 92621                             | Empl Benefits-Life Ins                       | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 90       | 92622                             | Empl Benefits-Disability Ins                 | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 91       | 92630                             | Empl Benefits-Recreation                     | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 92       | 92640                             | Empl Benefits-Educat Assist                  | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 93       | 92695                             | Vacation Earned                              | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 94       | 92800                             | Reg Commission Exp-General                   | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 95       | 92820                             | State Board Of Accts Exp                     | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 96       | 93020                             | Misc General Exp                             | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 97       | 93021                             | Memberships And Dues                         | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 98       | 93100                             | Rents  | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 99       | 93200                             | Maint Of Gen Pl-Structures                   | Source Document 14              | 127,024          | 126,000            | (1,024)                   | (768)             | 126,256                   |
| 100      | 93210                             | Maint Of Gen Pl-Office Furn                  | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 101      | 93220                             | Maint Of Gen Pl-Misc                         | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 102      | 93230                             | Maint Of Gen Pl-Communicat                   | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 103      | 93235                             | Maint Of Gen Pl-Electrical                   | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 104      | 93240                             | Maint Of Gen Pl-Com Soft                     | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 105      | 93245                             | Maint Of Gen Pl-Com Hard                     | Source Document 14              | -                | -                  | -                         | -                 | -                         |
| 106      | 93300                             | Transportation Expenses                      | Source Document 14              | 46,706           | 54,600             | 7,894                     | 5,920             | 52,627                    |
| 107      |                                   | Total Administrative and General             |                                 | 1,724,799        | 1,671,919          | (52,880)                  | (39,660)          | 1,685,139                 |
| 108      |                                   | <b>Total Labor Expenses</b>                  |                                 | <b>5,490,443</b> | <b>5,829,325</b>   | <b>338,882</b>            | <b>254,161</b>    | <b>5,744,605</b>          |
| 109      | <b>Benefits and Payroll Taxes</b> |  |                                 | <b>Test Year</b> | <b>Budget 2020</b> | <b>Ave % of Labor Exp</b> | <b>Adjustment</b> | <b>Adjusted Test Year</b> |
| 110      | Employee Benefits                 |  |                                 |                  |                    |                           |                   |                           |
| 111      | 92600                             | Empl Benefits-General                        | NP 22, Source Documents 14 & 15 | 26,785           | 30,835             | 0.5%                      | 3,087             | 29,872                    |
| 112      | 92610                             | Empl Benefits-Pension                        | NP 22, Source Documents 14 & 15 | 2,192,884        | 2,166,061          | 37.9%                     | (18,373)          | 2,174,511                 |
| 113      | 92615                             | Employee Benefit - Defined Contribution Plan | NP 22, Source Documents 14 & 15 | 79,585           | 111,000            | 1.8%                      | 23,244            | 102,828                   |
| 114      | 92620                             | Empl Benefits-Health Ins                     | NP 22, Source Documents 14 & 15 | 1,403,026        | 1,566,000          | 26.5%                     | 121,592           | 1,524,618                 |
| 115      | 92621                             | Empl Benefits-Life Ins                       | NP 22, Source Documents 14 & 15 | 11,468           | 12,000             | 0.2%                      | 596               | 12,064                    |
| 116      | 92622                             | Empl Benefits-Disability Ins                 | NP 22, Source Documents 14 & 15 | 14,161           | 17,000             | 0.3%                      | 1,924             | 16,085                    |
| 117      | 92630                             | Empl Benefits-Recreation                     | NP 22, Source Documents 14 & 15 | -                | -                  | 0.0%                      | -                 | -                         |
| 118      | 92640                             | Empl Benefits-Educat Assist                  | NP 22, Source Documents 14 & 15 | 1,908            | 10,000             | 0.1%                      | 6,134             | 8,042                     |
| 119      | 92695                             | Vacation Earned                              | NP 22, Source Documents 14 & 15 | 34,628           | -                  | 0.2%                      | (25,436)          | 9,191                     |
|          |                                   |  |                                 | 3,764,443        | 3,912,896          |                           | 112,768           | 3,877,212                 |
| 120      | 40812                             | Tax Exp-Fica                                 | NP 22, Source Documents 14 & 15 | 448,690          | 520,442            | 8.7%                      | 53,389            | 502,078                   |

**Attachment LAT-2**  
**Page 17 of 45**

| PLANT IN SERVICE YE 93019 |              |                                 |                |               |               |               |               |               |               |               |               |               |               |               |                |               |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
|---------------------------|--------------|---------------------------------|----------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---|---|---|---|---|---|---|---|---|---|----|----|----|----|----|
|                           | A            | B                               | C              | D             | E             | F             | G             | H             | I             | J             | K             | L             | M             | N             | O              | P             | Q | R | S | T | U | V | W | X | Y | Z | AA | AB | AC | AD | AE |
| Line No.                  | ACCT. NO.    | Source Document                 | September 2018 | October 2018  | November 2018 | December 2018 | January 2019  | February 2019 | March 2019    | April 2019    | May 2019      | June 2019     | July 2019     | August 2019   | September 2019 | Weighted Ave  |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 1                         | WWVS         | 31000 Source Document 16, WP 11 | 80,644.08      | 80,644.08     | 80,644.08     | 80,644.08     | 80,644.08     | 80,644.08     | 80,644.08     | 80,644.08     | 80,644.08     | 80,644.08     | 80,644.08     | 80,644.08     | 80,644.08      | 80,644.08     |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 2                         |              | 31100 Source Document 16, WP 11 | 2,848,645.48   | 2,848,645.48  | 2,848,645.48  | 2,848,645.48  | 2,848,645.48  | 2,848,645.48  | 2,848,645.48  | 2,848,645.48  | 2,848,645.48  | 2,848,645.48  | 2,848,645.48  | 2,848,645.48  | 2,848,645.48   | 2,848,645.48  |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 3                         |              | 31200 Source Document 16, WP 11 | 24,874,229.02  | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02  | 24,874,229.02 |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 4                         |              | 31400 Source Document 16, WP 11 | 12,493,389.51  | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51  | 12,493,389.51 |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 5                         |              | 31440 Source Document 16, WP 11 | 119,062.55     | 119,062.55    | 119,062.55    | 119,062.55    | 119,062.55    | 119,062.55    | 119,062.55    | 119,062.55    | 119,062.55    | 119,062.55    | 119,062.55    | 119,062.55    | 119,062.55     | 119,062.55    |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 6                         |              | 31500 Source Document 16, WP 11 | 2,282,709.79   | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79   | 2,282,709.79  |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 7                         |              | 31600 Source Document 16, WP 11 | 9,516,266.25   | 9,516,266.25  | 9,516,266.25  | 9,516,266.25  | 9,516,266.25  | 9,516,266.25  | 9,516,266.25  | 9,516,266.25  | 9,516,266.25  | 9,516,266.25  | 9,516,266.25  | 9,516,266.25  | 9,516,266.25   | 9,516,266.25  |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 8                         |              | 34600 Source Document 16, WP 11 | 880,799.58     | 880,799.58    | 880,799.58    | 880,799.58    | 880,799.58    | 880,799.58    | 880,799.58    | 880,799.58    | 880,799.58    | 880,799.58    | 880,799.58    | 880,799.58    | 880,799.58     | 880,799.58    |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 9                         | SUB-TOTAL    |                                 | 53,095,746.26  | 53,095,746.26 | 53,095,746.26 | 53,095,746.26 | 53,095,746.26 | 53,095,746.26 | 53,095,746.26 | 53,095,746.26 | 53,095,746.26 | 53,095,746.26 | 53,095,746.26 | 53,095,746.26 | 53,095,746.26  | 53,095,746.26 |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 10                        | TRANSMISSION | 35000 Source Document 16, WP 11 | 568,604.44     | 568,604.44    | 568,604.44    | 568,640.69    | 568,640.69    | 568,640.69    | 568,640.69    | 568,640.69    | 568,640.69    | 568,640.69    | 568,640.69    | 568,640.69    | 568,640.69     | 568,632.32    |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 11                        |              | 35200 Source Document 16, WP 11 | 560,359.40     | 560,359.40    | 560,359.40    | 560,359.40    | 560,359.40    | 560,359.40    | 560,359.40    | 560,359.40    | 560,359.40    | 560,359.40    | 560,359.40    | 560,359.40    | 560,359.40     | 560,359.40    |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 12                        |              | 35300 Source Document 16, WP 11 | 2,220,833.46   | 2,220,833.46  | 2,220,833.46  | 2,483,297.07  | 2,483,297.07  | 2,484,495.07  | 2,484,495.07  | 2,484,495.07  | 2,484,495.07  | 2,484,495.07  | 2,484,495.07  | 2,484,495.07  | 2,484,495.07   | 2,423,465.78  |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 13                        |              | 35310 Source Document 16, WP 11 | 2,958,505.65   | 2,958,505.65  | 2,958,505.65  | 2,958,505.65  | 2,958,505.65  | 2,958,505.65  | 2,958,505.65  | 2,958,505.65  | 2,958,505.65  | 2,958,505.65  | 2,958,505.65  | 2,958,505.65  | 2,958,505.65   | 2,958,505.65  |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 14                        |              | 35320 Source Document 16, WP 11 | 2,807,177.18   | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18   | 2,807,177.18  |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 15                        |              | 35325 Source Document           |                |               |               |               |               |               |               |               |               |               |               |               |                |               |   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |

| PLANT IN SERVICE YE 93019 |             |                           |                |                |                |                |                |                |                |                |                |                |                |                |                |                |              |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
|---------------------------|-------------|---------------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|--------------|---|---|---|---|---|---|---|---|---|----|----|----|----|----|
|                           | A           | B                         | C              | D              | E              | F              | G              | H              | I              | J              | K              | L              | M              | N              | O              | P              | Q            | R | S | T | U | V | W | X | Y | Z | AA | AB | AC | AD | AE |
| Line No.                  | ACCT. NO.   | Source Document           | September 2018 | October 2018   | November 2018  | December 2018  | January 2019   | February 2019  | March 2019     | April 2019     | May 2019       | June 2019      | July 2019      | August 2019    | September 2019 | Weighted Ave   |              |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 55                        | 39100       | Source Document 16, WP 11 | 7,962,030.31   | 7,962,030.31   | 7,962,030.31   | 7,976,644.56   | 7,976,644.56   | 7,976,644.56   | 7,981,595.45   | 7,981,595.45   | 7,981,595.45   | 7,981,595.45   | 7,981,595.45   | 7,981,595.45   | 7,981,595.45   | 7,981,595.45   | 7,975,937.90 |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 56                        | 39200       | Source Document 16, WP 11 | 3,363,331.47   | 3,270,910.47   | 3,270,910.47   | 3,965,467.31   | 3,965,467.31   | 3,943,357.31   | 3,943,357.31   | 3,943,357.31   | 3,943,357.31   | 3,943,357.31   | 3,943,357.31   | 3,943,357.31   | 3,943,357.31   | 3,943,357.31   | 3,975,002.27 |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 57                        | 39300       | Source Document 16, WP 11 | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66      | 54,876.66    |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 58                        | 39400       | Source Document 16, WP 11 | 1,373,408.26   | 1,373,408.26   | 1,373,408.26   | 1,389,058.38   | 1,389,058.38   | 1,389,058.38   | 1,389,058.38   | 1,389,058.38   | 1,389,058.38   | 1,389,058.38   | 1,389,058.38   | 1,389,058.38   | 1,389,058.38   | 1,389,058.38   | 1,385,446.81 |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 59                        | 39500/39510 | Source Document 16, WP 11 | 841,268.75     | 841,268.75     | 841,268.75     | 834,648.75     | 834,648.75     | 834,648.75     | 855,172.69     | 855,172.69     | 855,172.69     | 855,172.69     | 855,172.69     | 855,172.69     | 855,172.69     | 855,172.69     | 847,227.79   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 60                        | 39600       | Source Document 16, WP 11 | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47   | 1,598,583.47 |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 61                        | 39700/39710 | Source Document 16, WP 11 | 4,544,904.01   | 4,543,547.88   | 4,553,633.59   | 4,559,516.65   | 4,553,256.69   | 4,554,240.62   | 4,560,105.62   | 4,560,105.62   | 4,560,105.62   | 4,560,105.62   | 4,560,105.62   | 4,560,105.62   | 4,560,105.62   | 4,560,105.62   | 4,568,377.27 |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 62                        | 39800       | Source Document 16, WP 11 | 338,449.69     | 338,449.69     | 338,449.69     | 353,210.87     | 353,210.87     | 353,210.87     | 353,210.87     | 353,210.87     | 353,210.87     | 353,210.87     | 353,210.87     | 353,210.87     | 353,210.87     | 353,210.87     | 349,804.44   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 63                        | 39900       | Source Document 16, WP 11 | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42      | 85,873.42    |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 64                        | SUB-TOTAL   |                           | 25,381,428.99  | 25,287,651.86  | 25,297,737.57  | 26,098,138.80  | 26,091,878.84  | 26,070,752.77  | 26,102,092.60  | 26,102,092.60  | 26,100,089.76  | 25,929,281.63  | 25,959,894.21  | 25,949,117.14  | 25,954,429.93  | 25,871,183.59  |              |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
| 65                        | GRAND TOTAL |                           |                |                |                |                |                |                |                |                |                |                |                |                |                |                |              |   |   |   |   |   |   |   |   |   |    |    |    |    |    |
|                           |             |                           | 189,385,031.02 | 189,259,734.78 | 189,327,101.28 | 192,008,630.49 | 192,014,091.51 | 192,073,715.79 | 192,098,510.39 | 192,292,906.62 | 192,268,288.38 | 192,128,803.05 | 192,241,556.77 | 192,239,219.73 | 192,226,812.25 | 191,504,954.00 |              |   |   |   |   |   |   |   |   |   |    |    |    |    |    |

Direct Testimony of L. Tomczyk  
Petitioner's Exhibit 2

Test Year Depreciation Reserve LAT WP-10

|          | A                                      | B              | C             | D             | E             | F             | G             | H             | I             | J             | K             | L             | M             | N              | O                | P | Q | R | S | T | U | V | W | X | Y | Z | AA | AB | AC |
|----------|--|----------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|------------------|---|---|---|---|---|---|---|---|---|---|---|----|----|----|
| Line No. | Source Document                        | September 2018 | October 2018  | November 2018 | December 2018 | January 2019  | February 2019 | March 2019    | April 2019    | May 2019      | June 2019     | July 2019     | August 2019   | September 2019 | Weighted Average |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 1        | WHITEWATER                             |                |               |               |               |               |               |               |               |               |               |               |               |                |                  |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 2        | 31000 Source Document 16, WP 12, WP 13 |                |               |               |               |               |               |               |               |               |               |               |               |                |                  |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 3        | 31100 Source Document 16, WP 12, WP 13 | 2,744,718.24   | 2,749,466.93  | 2,754,215.62  | 2,758,964.31  | 2,763,713.00  | 2,768,461.70  | 2,773,210.39  | 2,777,959.08  | 2,782,707.77  | 2,787,456.46  | 2,792,205.16  | 2,796,953.85  | 2,801,702.54   | 2,773,210.39     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 4        | 31200 Source Document 16, WP 12, WP 13 | 24,398,660.59  | 24,471,218.72 | 24,543,776.84 | 24,616,334.97 | 24,688,893.09 | 24,761,451.22 | 24,834,009.35 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02 | 24,874,229.02  | 24,735,362.99    |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 5        | 31400 Source Document 16, WP 12, WP 13 | 12,493,389.51  | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51 | 12,493,389.51  | 12,493,389.51    |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 6        | 31440 Source Document 16, WP 12, WP 13 | 113,783.97     | 114,081.62    | 114,379.28    | 114,676.94    | 114,974.59    | 115,272.25    | 115,569.91    | 115,867.56    | 116,165.22    | 116,462.88    | 116,760.53    | 117,058.19    | 117,355.84     | 115,569.91       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 7        | 31500 Source Document 16, WP 12, WP 13 | 2,282,709.79   | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79  | 2,282,709.79   | 2,282,709.79     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 8        | 31600 Source Document 16, WP 12, WP 13 | 3,632,278.55   | 3,660,037.50  | 3,687,796.45  | 3,715,555.40  | 3,743,314.35  | 3,771,073.30  | 3,798,832.24  | 3,826,591.19  | 3,854,350.14  | 3,882,109.09  | 3,909,868.04  | 3,937,626.99  | 3,965,385.94   | 3,798,832.24     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 9        | 34600 Source Document 16, WP 12, WP 13 | 418,794.66     | 421,363.95    | 423,933.24    | 426,502.53    | 429,071.83    | 431,641.12    | 434,210.41    | 436,779.70    | 439,349.00    | 441,918.29    | 444,487.58    | 447,056.87    | 449,626.17     | 434,210.41       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 10       | SUB-TOTAL                              | 46,084,335.30  | 46,192,268.02 | 46,300,200.73 | 46,408,133.45 | 46,516,066.16 | 46,623,998.88 | 46,731,931.60 | 46,807,525.86 | 46,842,900.45 | 46,878,275.04 | 46,913,649.63 | 46,949,024.22 | 46,984,398.81  | 46,633,285.24    |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 11       | TRANSMISSION                           |                |               |               |               |               |               |               |               |               |               |               |               |                |                  |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 12       | 35000 Source Document 16, WP 12, WP 13 | 0.00           | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00           | 0.00             |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 13       | 35200 Source Document 16, WP 12, WP 13 | 415,593.22     | 416,293.67    | 416,994.12    | 417,694.57    | 418,395.02    | 419,095.47    | 419,795.91    | 420,496.36    | 421,196.81    | 421,897.26    | 422,597.71    | 423,298.16    | 423,998.61     | 419,795.91       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 14       | 35300 Source Document 16, WP 12, WP 13 | 1,145,871.73   | 1,152,349.90  | 1,158,828.07  | 1,165,306.24  | 1,172,550.02  | 1,179,793.80  | 1,187,041.07  | 1,194,288.34  | 1,201,535.61  | 1,208,782.89  | 1,216,030.16  | 1,223,277.43  | 1,230,524.70   | 1,187,398.46     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 15       | 35310 Source Document 16, WP 12, WP 13 | 1,627,354.23   | 1,635,984.19  | 1,644,614.15  | 1,653,244.11  | 1,661,874.07  | 1,670,504.04  | 1,679,134.00  | 1,687,763.96  | 1,696,393.92  | 1,705,023.88  | 1,713,653.84  | 1,722,283.80  | 1,730,913.76   | 1,679,134.00     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 16       | 35320 Source Document 16, WP 12, WP 13 | 2,807,177.18   | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18  | 2,807,177.18   | 2,807,177.18     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 17       | 35325 Source Document 16, WP 12, WP 13 | 1,396,250.92   | 1,406,593.52  | 1,416,936.12  | 1,427,278.72  | 1,437,650.65  | 1,448,022.59  | 1,458,394.52  | 1,468,766.46  | 1,479,138.39  | 1,489,510.33  | 1,499,882.26  | 1,510,254.20  | 1,520,626.13   | 1,458,408.06     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 18       | 35330 Source Document 16, WP 12, WP 13 | 663,778.48     | 670,486.96    | 677,195.45    | 683,903.94    | 690,651.48    | 697,399.03    | 704,146.57    | 710,894.12    | 717,641.66    | 724,389.20    | 731,136.75    | 737,884.29    | 744,631.84     | 704,146.57       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 19       | 35340 Source Document 16, WP 12, WP 13 | 1,350,591.50   | 1,358,278.14  | 1,365,964.78  | 1,373,651.42  | 1,381,338.05  | 1,389,024.69  | 1,396,711.33  | 1,404,397.97  | 1,412,084.61  | 1,419,771.25  | 1,427,457.89  | 1,435,144.53  | 1,442,831.16   | 1,396,711.33     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 20       | 35350 Source Document 16, WP 12, WP 13 | 19,398.15      | 19,498.63     | 19,599.12     | 19,699.61     | 19,800.09     | 19,900.58     | 20,001.06     | 20,101.55     | 20,202.04     | 20,302.52     | 20,403.01     | 20,503.50     | 20,603.98      | 20,001.06        |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 21       | 35360 Source Document 16, WP 12, WP 13 | 749,685.08     | 753,560.68    | 757,436.29    | 761,311.89    | 765,192.60    | 769,073.31    | 772,954.02    | 776,834.73    | 780,715.44    | 784,596.15    | 788,476.86    | 792,357.57    | 796,238.28     | 772,956.38       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 22       | 35370 Source Document 16, WP 12, WP 13 | 492,344.94     | 494,355.51    | 496,366.09    | 498,376.66    | 500,387.24    | 502,397.81    | 504,409.75    | 506,421.70    | 508,433.64    | 510,445.58    | 512,457.52    | 514,469.47    | 516,481.41     | 504,411.33       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 23       | 35380 Source Document 16, WP 12, WP 13 | 19,716.72      | 19,867.57     | 20,018.42     | 20,169.27     | 20,476.39     | 20,783.51     | 21,090.62     | 21,397.74     | 21,704.86     | 22,011.98     | 22,319.09     | 22,626.21     | 22,933.33      | 21,162.75        |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 24       | 35385 Source Document 16, WP 12, WP 13 | 0.00           | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00           | 0.00             |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 25       | 35390 Source Document 16, WP 12, WP 13 | 142,538.11     | 143,262.76    | 143,987.41    | 144,712.06    | 145,436.71    | 146,161.36    | 146,886.01    | 147,610.66    | 148,335.30    | 149,059.95    | 149,784.60    | 150,509.25    | 151,233.90     | 146,886.01       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 26       | 35395 Source Document 16, WP 12, WP 13 | 742,215.67     | 749,163.31    | 756,110.96    | 763,058.61    | 770,006.25    | 776,953.90    | 783,901.54    | 790,849.19    | 797,796.84    | 804,744.48    | 811,692.13    | 818,639.77    | 825,587.42     | 783,901.54       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 27       | 35400 Source Document 16, WP 12, WP 13 | 115,801.19     | 116,335.97    | 116,870.74    | 117,405.52    | 117,940.30    | 118,475.07    | 119,009.85    | 119,544.62    | 120,079.40    | 120,614.17    | 121,148.95    | 121,683.73    | 122,218.50     | 119,009.85       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 28       | 35500 Source Document 16, WP 12, WP 13 | 2,479,875.01   | 2,488,941.58  | 2,498,007.97  | 2,507,074.37  | 2,516,140.76  | 2,525,207.15  | 2,534,273.54  | 2,543,339.94  | 2,552,406.33  | 2,561,472.72  | 2,570,539.11  | 2,579,605.51  | 2,588,671.90   | 2,534,273.54     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 29       | 35600 Source Document 16, WP 12, WP 13 | 1,189,535.51   | 1,192,917.28  | 1,196,299.05  | 1,199,680.82  | 1,203,062.59  | 1,206,444.36  | 1,209,826.13  | 1,213,207.90  | 1,216,589.67  | 1,219,971.43  | 1,223,353.20  | 1,226,734.97  | 1,230,116.74   | 1,209,826.13     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 30       | 35700 Source Document 16, WP 12, WP 13 | 22,279.53      | 22,427.98     | 22,576.44     | 22,724.89     | 22,873.36     | 23,021.82     | 23,170.28     | 23,318.74     | 23,467.20     | 23,615.67     | 23,764.13     | 23,912.59     | 24,061.05      | 23,170.28        |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 31       | 35800 Source Document 16, WP 12, WP 13 | 151,197.08     | 151,673.42    | 152,149.75    | 152,626.09    | 153,102.43    | 153,578.76    | 154,055.10    | 154,531.43    | 155,007.77    | 155,484.11    | 155,960.44    | 156,436.78    | 156,913.11     | 154,055.10       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 32       | 35900 Source Document 16, WP 12, WP 13 | 782.68         | 782.68        | 782.68        | 782.68        | 782.68        | 782.68        | 782.68        | 782.68        | 782.68        | 782.68        | 782.68        | 782.68        | 782.68         | 782.68           |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 33       | SUB-TOTAL                              | 15,531,987.10  | 15,599,950.95 | 15,667,914.79 | 15,735,878.65 | 15,804,837.87 | 15,873,797.10 | 15,942,761.18 | 16,011,725.27 | 16,080,689.36 | 16,149,653.45 | 16,218,617.53 | 16,287,581.62 | 16,356,545.71  | 15,943,226.20    |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 34       | DISTRIBUTION                           |                |               |               |               |               |               |               |               |               |               |               |               |                |                  |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 35       | 36000 Source Document 16, WP 12, WP 13 | 0.00           | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00          | 0.00           | 0.00             |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 36       | 36100 Source Document 16, WP 12, WP 13 | 628,845.90     | 630,562.87    | 632,279.85    | 633,996.82    | 635,724.11    | 637,451.40    | 639,178.69    | 640,905.98    | 642,633.26    | 644,360.55    | 646,087.84    | 647,815.13    | 649,542.42     | 639,183.45       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 37       | 36200 Source Document 16, WP 12, WP 13 | 8,796,393.56   | 8,796,393.56  | 8,796,393.56  | 8,796,393.56  | 8,796,393.56  | 8,796,393.56  | 8,796,393.56  | 8,796,393.56  | 8,796,393.56  | 8,796,393.56  | 8,796,393.56  | 8,796,393.56  | 8,796,393.56   | 8,796,393.56     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 38       | 36300 Source Document 16, WP 12, WP 13 | 36,366.80      | 36,667.54     | 36,968.27     | 37,269.00     | 37,569.74     | 37,870.47     | 38,171.20     | 38,471.94     | 38,772.67     | 39,073.40     | 39,374.14     | 39,674.87     | 39,975.60      | 38,171.20        |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 39       | 36400 Source Document 16, WP 12, WP 13 | 7,848,724.39   | 7,880,971.80  | 7,913,219.21  | 7,945,492.62  | 7,978,821.88  | 8,008,542.62  | 8,041,872.13  | 8,075,201.64  | 8,108,531.15  | 8,141,860.66  | 8,175,190.16  | 8,208,534.77  | 8,241,879.38   | 8,043,756.93     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 40       | 36500 Source Document 16, WP 12, WP 13 | 7,802,969.68   | 7,832,280.41  | 7,861,591.14  | 7,890,920.16  | 7,920,692.23  | 7,947,327.05  | 7,977,204.05  | 8,007,081.05  | 8,036,958.06  | 8,066,835.06  | 8,096,719.74  | 8,126,614.70  | 8,156,509.67   | 7,978,746.38     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 41       | 36600 Source Document 16, WP 12, WP 13 | 2,538,835.27   | 2,550,416.24  | 2,561,997.38  | 2,573,626.78  | 2,585,561.12  | 2,597,503.03  | 2,609,453.21  | 2,621,404.72  | 2,633,356.80  | 2,645,308.87  | 2,657,286.56  | 2,669,278.48  | 2,681,288.14   | 2,609,639.74     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 42       | 36700 Source Document 16, WP 12, WP 13 | 4,585,042.51   | 4,624,972.07  | 4,664,991.85  | 4,704,991.85  | 4,744,991.85  | 4,784,991.85  | 4,824,991.85  | 4,864,991.85  | 4,904,991.85  | 4,944,991.85  | 4,984,991.85  | 5,024,991.85  | 5,064,991.85   | 4,784,991.85     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 43       | 36810 Source Document 16, WP 12, WP 13 | 3,630,420.55   | 3,630,151.69  | 3,641,642.32  | 3,653,135.01  | 3,664,630.34  | 3,676,125.67  | 3,687,621.00  | 3,699,116.33  | 3,710,611.66  | 3,722,107.00  | 3,733,602.33  | 3,745,097.66  | 3,756,593.00   | 3,688,364.10     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 44       | 36820 Source Document 16, WP 12, WP 13 | 4,313,930.79   | 4,320,744.43  | 4,338,948.38  | 4,350,188.42  | 4,365,211.82  | 4,380,235.22  | 4,395,258.62  | 4,410,282.02  | 4,425,305.42  | 4,440,328.82  | 4,455,352.22  | 4,470,375.62  | 4,485,399.02   | 4,400,328.82     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 45       | 36910 Source Document 16, WP 12, WP 13 | 4,006,815.75   | 4,019,164.08  | 4,031,512.41  | 4,043,861.72  | 4,056,265.30  | 4,068,554.96  | 4,080,958.45  | 4,093,361.95  | 4,105,765.44  | 4,118,168.94  | 4,130,572.44  | 4,142,975.95  | 4,155,379.45   | 4,081,018.00     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 46       | 36920 Source Document 16, WP 12, WP 13 | 1,450,083.12   | 1,457,054.96  | 1,464,026.79  | 1,471,004.81  | 1,478,023.94  | 1,485,045.97  | 1,492,066.54  | 1,499,087.12  | 1,506,107.70  | 1,513,128.28  | 1,520,148.85  | 1,527,171.57  | 1,534,194.28   | 1,492,088.11     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 47       | 37000 Source Document 16, WP 12, WP 13 | 1,154,672.45   | 1,167,681.46  | 1,174,692.47  | 1,181,703.48  | 1,188,714.49  | 1,195,725.50  | 1,202,736.51  | 1,209,747.52  | 1,216,758.53  | 1,223,769.54  | 1,230,780.55  | 1,237,791.56  | 1,244,802.57   | 1,202,736.51     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 48       | 37100 Source Document 16, WP 12, WP 13 | 687,287.73     | 690,164.36    | 693,041.00    | 695,934.09    | 698,845.54    | 701,748.59    | 704,651.64    | 707,554.69    | 710,457.74    | 713,360.79    | 716,263.84    | 719,166.89    | 722,069.94     | 704,651.64       |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 49       | 37310 Source Document 16, WP 12, WP 13 | 2,525,636.60   | 2,525,636.60  | 2,525,636.60  | 2,525,636.60  | 2,525,636.60  | 2,525,636.60  | 2,525,636.60  | 2,525,636.60  | 2,525,636.60  | 2,525,636.60  | 2,525,636.60  | 2,525,636.60  | 2,525,636.60   | 2,525,636.60     |   |   |   |   |   |   |   |   |   |   |   |    |    |    |
| 50       | 37                                     |                |               |               |               |               |               |               |               |               |               |               |               |                |                  |   |   |   |   |   |   |   |   |   |   |   |    |    |    |



Direct Testimony of L. Tomczyk  
Petitioner's Exhibit 2

Test Year Depreciation Reserve LAT WP-10

|          | A               | B                                | C              | D | E              | F | G              | H | I              | J | K              | L | M              | N | O              | P | Q              | R | S              | T | U              | V | W              | X | Y              | Z | AA             | AB | AC               |
|----------|-----------------|----------------------------------|----------------|---|----------------|---|----------------|---|----------------|---|----------------|---|----------------|---|----------------|---|----------------|---|----------------|---|----------------|---|----------------|---|----------------|---|----------------|----|------------------|
| Line No. | Source Document |                                  | September 2018 |   | October 2018   |   | November 2018  |   | December 2018  |   | January 2019   |   | February 2019  |   | March 2019     |   | April 2019     |   | May 2019       |   | June 2019      |   | July 2019      |   | August 2019    |   | September 2019 |    | Weighted Average |
| 64       | 39600           | Source Document 16, WP 12, WP 13 | 1,457,987.80   |   | 1,464,649.10   |   | 1,471,310.40   |   | 1,477,971.69   |   | 1,484,632.99   |   | 1,491,294.29   |   | 1,497,955.58   |   | 1,504,616.88   |   | 1,511,278.18   |   | 1,517,939.48   |   | 1,524,600.77   |   | 1,531,262.07   |   | 1,537,923.37   |    | 1,497,955.58     |
| 65       | 39700/39710     | Source Document 16, WP 12, WP 13 | 3,533,405.00   |   | 3,548,553.17   |   | 3,563,696.81   |   | 3,578,435.69   |   | 3,593,632.56   |   | 3,608,672.59   |   | 3,623,851.88   |   | 3,639,050.71   |   | 3,653,819.81   |   | 3,669,011.96   |   | 3,684,227.19   |   | 3,699,544.44   |   | 3,714,828.45   |    | 3,623,902.33     |
| 66       | 39800           | Source Document 16, WP 12, WP 13 | 294,863.10     |   | 295,991.15     |   | 297,119.20     |   | 298,247.26     |   | 299,424.51     |   | 300,601.76     |   | 301,779.01     |   | 302,956.26     |   | 304,133.52     |   | 305,310.77     |   | 306,488.02     |   | 307,665.27     |   | 308,842.52     |    | 301,801.72       |
| 67       | 39900           | Source Document 16, WP 12, WP 13 | 82,507.17      |   | 82,507.17      |   | 82,507.17      |   | 82,507.17      |   | 82,507.17      |   | 82,507.17      |   | 82,507.17      |   | 82,507.17      |   | 82,507.17      |   | 82,507.17      |   | 82,507.17      |   | 82,507.17      |   | 82,507.17      |    | 82,507.17        |
| 68       | SUB-TOTAL       |                                  | 20,143,729.03  |   | 20,125,367.99  |   | 20,194,767.82  |   | 20,218,355.00  |   | 20,314,188.09  |   | 20,365,424.39  |   | 20,433,440.62  |   | 20,508,371.11  |   | 20,577,920.97  |   | 20,475,855.70  |   | 20,545,353.83  |   | 20,613,992.25  |   | 20,682,767.69  |    | 20,399,964.19    |
| 69       | TOTAL           |                                  | 133,254,011.48 |   | 133,542,810.16 |   | 133,940,674.50 |   | 134,294,104.83 |   | 134,734,122.42 |   | 135,120,886.27 |   | 135,538,945.73 |   | 135,922,114.09 |   | 136,253,854.92 |   | 136,407,185.24 |   | 136,743,650.34 |   | 137,077,634.28 |   | 137,411,246.83 |    | 135,403,172.39   |

|          | A                                       | B                  | C            | D             | E             | F            | G             | H          | I          | J        | K         | L         | M           | N              | O      | P | Q | R | S | T | U | V | W | X | Y | Z | AA | AB |  |
|----------|---|--------------------|--------------|---------------|---------------|--------------|---------------|------------|------------|----------|-----------|-----------|-------------|----------------|--------|---|---|---|---|---|---|---|---|---|---|---|----|----|--|
| Line No. | PROPERTY AND PLANT GROSS ADDITIONS 2019 |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 1        |   |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 2        |   |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 3        |   | Source Documents   | OCTOBER 2018 | NOVEMBER 2018 | DECEMBER 2018 | JANUARY 2019 | FEBRUARY 2019 | MARCH 2019 | APRIL 2019 | MAY 2019 | JUNE 2019 | JULY 2019 | AUGUST 2019 | SEPTEMBER 2019 | YEARLY |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 4        | WWVS                                    |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 5        | 31000                                   | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 6        | RETIREMENTS                             | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 7        | ADJUSTMENTS                             |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 8        | 31100                                   | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 9        | RETIREMENTS                             | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 10       | ADJUSTMENTS                             |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 11       | 31200                                   | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 12       | RETIREMENTS                             | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 13       | ADJUSTMENTS                             |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 14       | 31400                                   | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 15       | RETIREMENTS                             | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 16       | ADJUSTMENTS                             |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 17       | 31440                                   | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 18       | RETIREMENTS                             | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 19       | ADJUSTMENTS                             |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 20       | 31500                                   | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 21       | RETIREMENTS                             | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 22       | ADJUSTMENTS                             |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 23       | 31600                                   | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 24       | RETIREMENTS                             | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 25       | ADJUSTMENTS                             |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 26       | 34600                                   | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 27       | RETIREMENTS                             | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 28       | ADJUSTMENTS                             |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 29       | SUB-TOTAL                               |                    | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 30       | RETIREMENTS                             |                    | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 31       | ADJUSTMENTS                             |                    | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 32       | TRANSMISSIONS YEARLY                    |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 33       | 35000                                   | Source Document 16 | 0.00         | 0.00          | 36.25         | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 34       | RETIREMENTS                             | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 35       | ADJUSTMENTS                             |                    |              |               |               |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 36       | 35200                                   | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00   |   |   |   |   |   |   |   |   |   |   |   |    |    |  |
| 37       | RETIREMENTS                             | Source Document 16 | 0.00         | 0.00          | 0.            |              |               |            |            |          |           |           |             |                |        |   |   |   |   |   |   |   |   |   |   |   |    |    |  |

Test Year Plant Additions, Retirements, Adjustments LAT WP-11

|          | A              | B                  | C | D            | E             | F             | G            | H             | I          | J          | K        | L         | M         | N           | O              | P          | Q          | R | S | T | U | V | W | X | Y | Z | AA | AB |  |  |  |
|----------|----------------|--------------------|---|--------------|---------------|---------------|--------------|---------------|------------|------------|----------|-----------|-----------|-------------|----------------|------------|------------|---|---|---|---|---|---|---|---|---|----|----|--|--|--|
| Line No. | PROPERTY AND   |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 1        | PLANT GROSS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 2        | ADDITIONS 2019 |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 3        |                | Source Documents   |   | OCTOBER 2018 | NOVEMBER 2018 | DECEMBER 2018 | JANUARY 2019 | FEBRUARY 2019 | MARCH 2019 | APRIL 2019 | MAY 2019 | JUNE 2019 | JULY 2019 | AUGUST 2019 | SEPTEMBER 2019 | YEARLY     |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 61       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 62       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 63       | 35370          | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 468.79        | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 468.79     |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 64       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 65       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 66       | 35380          | Source Document 16 |   | 0.00         | 0.00          | 53,571.85     | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 53,571.85  |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 67       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 68       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 69       | 35385          | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 70       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 71       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 72       | 35390          | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 73       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 74       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 75       | 35395          | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 76       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 77       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 78       | 35400          | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 79       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 80       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 81       | 35500          | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 82       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 83       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 84       | 35600          | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 85       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 86       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 87       | 35700          | Source Document 16 |   | 0.00         | 0.00          | 2.08          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 2.08       |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 88       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 89       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 90       | 35800          | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 91       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 92       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 93       | 35900          | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 94       | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 95       | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 96       | SUB-TOTAL      |                    |   | 0.00         | 0.00          | 341,270.61    | 0.00         | 1,666.79      | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 342,937.40 |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 97       | RETIREMENTS    |                    |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 98       | ADJUSTMENTS    |                    |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 99       | DISTRIBUTION   |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 100      | 36000          | Source Document 16 |   | 0.00         | 450.00        | 189.00        | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | —          |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 101      | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 102      | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 103      | 36100          | Source Document 16 |   | 0.00         | 0.00          | 5,500.00      | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 5,500.00   |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 104      | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 105      | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 106      | 36200          | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 107      | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 108      | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 109      | 36300          | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 110      | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 0.00       | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 111      | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 112      | 36400          | Source Document 16 |   | 0.00         | 9,444.35      | 424,251.43    | 399.04       | 3,543.47      | 0.00       | 0.00       | 0.00     | 0.00      | 6,039.63  | 0.00        | 443,677.92     | 0.00       | 443,677.92 |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 113      | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 4,798.94      | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 4,798.94   | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 114      | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 115      | 36500          | Source Document 16 |   | 0.00         | 7,314.87      | 177,220.03    | 18,810.19    | 27,394.79     | 0.00       | 0.00       | 0.00     | 3,071.68  | 4,112.85  | 0.00        | 237,924.41     | 0.00       | 237,924.41 |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 116      | RETIREMENTS    | Source Document 16 |   | 0.00         | 0.00          | 0.00          | 0.00         | 4,230.76      | 0.00       | 0.00       | 0.00     | 0.00      | 0.00      | 0.00        | 0.00           | 4,230.76   | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 117      | ADJUSTMENTS    |                    |   |              |               |               |              |               |            |            |          |           |           |             |                |            | 0.00       |   |   |   |   |   |   |   |   |   |    |    |  |  |  |
| 118      | 36600          | Source Document 16 |   | 125.95       | 34,750.45     | 219,567.04    | 5,381.31     | 5,983.93      | 967.44     | 400.00     | 0.00     | 18,440.50 | 10,249.60 | 12,773.38   | 906.57         | 309,546.17 |            |   |   |   |   |   |   |   |   |   |    |    |  |  |  |

| Line No. | A                        | B     | C                  | D            | E             | F             | G            | H             | I           | J          | K          | L         | M          | N           | O              | P           | Q    | R    | S    | T    | U    | V    | W    | X    | Y    | Z    | AA   | AB   |
|----------|--------------------------|-------|--------------------|--------------|---------------|---------------|--------------|---------------|-------------|------------|------------|-----------|------------|-------------|----------------|-------------|------|------|------|------|------|------|------|------|------|------|------|------|
| 1        | PROPERTY AND PLANT GROSS |       |                    |              |               |               |              |               |             |            |            |           |            |             |                |             |      |      |      |      |      |      |      |      |      |      |      |      |
| 2        | ADDITIONS 2019           |       |                    |              |               |               |              |               |             |            |            |           |            |             |                |             |      |      |      |      |      |      |      |      |      |      |      |      |
| 3        |                          |       | Source Documents   | OCTOBER 2018 | NOVEMBER 2018 | DECEMBER 2018 | JANUARY 2019 | FEBRUARY 2019 | MARCH 2019  | APRIL 2019 | MAY 2019   | JUNE 2019 | JULY 2019  | AUGUST 2019 | SEPTEMBER 2019 | YEARLY      |      |      |      |      |      |      |      |      |      |      |      |      |
| 119      | RETIREMENTS              |       | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00        | 0.00       | 0.00       | 0.00      | 0.00       | 0.00        | 0.00           | 0.00        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| 120      | ADJUSTMENTS              |       |                    |              |               |               |              |               |             |            |            |           |            |             |                |             |      |      |      |      |      |      |      |      |      |      |      | 0.00 |
| 121      |                          | 36700 | Source Document 16 | 0.00         | 26,405.02     | 600,716.83    | 8,545.89     | 15,429.24     | 0.00        | 0.00       | 0.00       | 15,852.99 | 24,112.45  | 67.68       | 0.00           | 691,130.10  |      |      |      |      |      |      |      |      |      |      |      |      |
| 122      | RETIREMENTS              |       | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00        | 0.00       | 0.00       | 0.00      | 0.00       | 0.00        | 0.00           | 0.00        |      |      |      |      |      |      |      |      | 0.00 | 0.00 | 0.00 | 0.00 |
| 123      | ADJUSTMENTS              |       |                    |              |               |               |              |               |             |            |            |           |            |             |                |             |      |      |      |      |      |      |      |      |      |      |      | 0.00 |
| 124      |                          | 36810 | Source Document 16 | (3,111.50)   | 763.58        | 973.28        | 0.00         | (1,836.37)    | (841.84)    | 0.00       | (2,776.44) | (934.85)  | (1,785.73) | 0.00        | (5,987.19)     | (15,537.06) |      |      |      |      |      |      |      |      |      |      |      |      |
| 125      | RETIREMENTS              |       | Source Document 16 | 12,776.29    | 0.00          | 0.00          | 0.00         | 300.02        | 0.00        | 0.00       | 0.00       | 0.00      | 0.00       | 0.00        | 0.00           | 13,076.31   |      |      |      |      |      |      |      |      | 0.00 | 0.00 | 0.00 | 0.00 |
| 126      | ADJUSTMENTS              |       |                    |              |               |               |              |               |             |            |            |           |            |             |                |             |      |      |      |      |      |      |      |      |      |      |      | 0.00 |
| 127      |                          | 36820 | Source Document 16 | (229.46)     | (23,598.79)   | (6,144.78)    | (19,453.00)  | 14,665.00     | 19,538.96   | (229.45)   | 0.00       | 9,753.00  | 47,182.43  | (14,061.37) | (4,196.84)     | 23,225.70   |      |      |      |      |      |      |      |      |      |      |      |      |
| 128      | RETIREMENTS              |       | Source Document 16 | 12,367.00    | 0.00          | 0.00          | 0.00         | 0.00          | 0.00        | 0.00       | 0.00       | 0.00      | 0.00       | 0.00        | 0.00           | 12,367.00   |      |      |      |      |      |      |      |      | 0.00 | 0.00 | 0.00 | 0.00 |
| 129      | ADJUSTMENTS              |       |                    |              |               |               |              |               |             |            |            |           |            |             |                |             |      |      |      |      |      |      |      |      |      |      |      | 0.00 |
| 130      |                          | 36910 | Source Document 16 | 0.00         | 395.01        | 21,702.49     | 0.00         | 120.24        | 0.00        | 0.00       | 0.00       | 0.00      | 92.07      | 0.00        | 0.00           | 22,309.81   |      |      |      |      |      |      |      |      | 0.00 | 0.00 | 0.00 | 0.00 |
| 131      | RETIREMENTS              |       | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 151.35        | 0.00        | 0.00       | 0.00       | 31.42     | 0.00       | 0.00        | 0.00           | 182.77      |      |      |      |      |      |      |      |      | 0.00 | 0.00 | 0.00 | 0.00 |
| 132      | ADJUSTMENTS              |       |                    |              |               |               |              |               |             |            |            |           |            |             |                |             |      |      |      |      |      |      |      |      |      |      |      | 0.00 |
| 133      |                          | 36920 | Source Document 16 | 0.00         | 2,473.91      | 17,022.53     | 0.00         | 0.00          | 0.00        | 0.00       | 0.00       | 0.00      | 853.86     | 0.00        | 0.00           | 20,350.30   |      |      |      |      |      |      |      |      | 0.00 | 0.00 | 0.00 | 0.00 |
| 134      | RETIREMENTS              |       | Source Document 16 | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00        | 0.00       | 0.00       | 0.00      | 0.00       | 0.00        | 0.00           | 0.00        |      |      |      |      |      |      |      |      | 0.00 | 0.00 | 0.00 | 0.00 |
| 135      | ADJUSTMENTS              |       |                    |              |               |               |              |               |             |            |            |           |            |             |                |             |      |      |      |      |      |      |      |      |      |      |      | 0.00 |
| 136      |                          | 37000 | Source Document 16 | 5,146.82     | (665.25)      | 12,523.55     | 3,453.91     | 28,570.27     | (23,591.91) | 197,919.88 | (6,392.46) | 75.72     | 2,089.35   | 507.60      | 4,330.74       | 223,968.22  |      |      |      |      |      |      |      |      |      |      |      |      |
| 137      | RETIREMENTS              |       | Source Document 16 | 8,253.42     | 6,138.50      | 3,749.35      |              |               |             |            |            |           |            |             |                |             |      |      |      |      |      |      |      |      |      |      |      |      |

[illegible]

Test Year Plant Additions, Retirements, Adjustments LAT WP-11

|          | A                 | B                | C            | D             | E             | F            | G             | H          | I          | J           | K          | L          | M           | N              | O            | P | Q | R | S | T | U | V | W | X | Y | Z | AA | AB |
|----------|-------------------|------------------|--------------|---------------|---------------|--------------|---------------|------------|------------|-------------|------------|------------|-------------|----------------|--------------|---|---|---|---|---|---|---|---|---|---|---|----|----|
| Line No. | PROPERTY AND      |                  |              |               |               |              |               |            |            |             |            |            |             |                |              |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 1        | PLANT GROSS       |                  |              |               |               |              |               |            |            |             |            |            |             |                |              |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 2        | ADDITIONS 2019    |                  |              |               |               |              |               |            |            |             |            |            |             |                |              |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 3        |                   | Source Documents | OCTOBER 2018 | NOVEMBER 2018 | DECEMBER 2018 | JANUARY 2019 | FEBRUARY 2019 | MARCH 2019 | APRIL 2019 | MAY 2019    | JUNE 2019  | JULY 2019  | AUGUST 2019 | SEPTEMBER 2019 | YEARLY       |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 236      | SUB-TOTAL         |                  | (1,356.13)   | 10,085.71     | 760,591.08    | (6,259.96)   | 1,164.59      | 31,339.83  | 0.00       | (1,304.84)  | 6,920.87   | 30,612.58  | (9,977.07)  | 4,512.79       | 0.00         |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 237      | RETIREMENTS       |                  | 92,421.00    | 0.00          | 20,100.36     | 0.00         | 22,290.66     | 0.00       | 0.00       | 698.00      | 177,729.00 | 0.00       | 0.00        | 0.00           | 313,239.02   |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 238      | ADJUSTMENTS       |                  | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00        | 0.00       | 0.00       | 0.00        | 0.00           | 0.00         |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 239      |                   |                  |              |               |               |              |               |            |            |             |            |            |             |                |              |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 240      |                   |                  | OCTOBER      | NOVEMBER      | DECEMBER      | JANUARY      | FEBRUARY      | MARCH      | APRIL      | MAY         | JUNE       | JULY       | AUGUST      | SEPTEMBER      | YEARLY       |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 241      | Gross Month total |                  | (1,356.13)   | 73,502.92     | 2,645,468.41  | 10,881.20    | 96,815.11     | 27,407.76  | 198,090.43 | (10,473.74) | 53,580.16  | 130,191.94 | 13,103.64   | (363.43)       | 3,236,848.27 |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 242      | Gross YTD total   |                  | (1,356.13)   | 72,146.79     | 2,717,615.20  | 10,881.20    | 107,696.31    | 135,104.07 | 333,194.50 | 322,720.76  | 376,300.92 | 506,492.86 | 519,596.50  | 519,233.07     | 5,619,626.05 |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 243      |                   |                  |              |               |               |              |               |            |            |             |            |            |             |                |              |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 244      | Adjustments Mo    |                  | 0.00         | 0.00          | 0.00          | 0.00         | 0.00          | 0.00       | 0.00       | 0.00        | 0.00       | 0.00       | 0.00        | 0.00           | 0.00         |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 245      | Retirements Mo    |                  | 125,817.71   | 6,138.50      | 23,849.71     | 5,420.18     | 37,190.83     | 2,613.16   | 3,694.20   | 14,144.50   | 193,065.49 | 17,438.22  | 15,440.68   | 12,044.05      | 456,857.23   |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 246      | RET. & ADJ. YTD   |                  | 125,817.71   | 131,956.21    | 155,805.92    | 5,420.18     | 42,611.01     | 45,224.17  | 48,918.37  | 63,062.87   | 256,128.36 | 273,566.58 | 289,007.26  | 301,051.31     | 1,738,569.95 |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 247      |                   |                  |              |               |               |              |               |            |            |             |            |            |             |                |              |   |   |   |   |   |   |   |   |   |   |   |    |    |
| 248      | Net To Date       |                  | 124,461.58   | 204,103.00    | 2,873,421.12  | 16,301.38    | 150,307.32    | 180,328.24 | 382,112.87 | 385,783.63  | 632,429.28 | 780,059.44 | 808,603.76  | 820,284.38     | 7,358,196.00 |   |   |   |   |   |   |   |   |   |   |   |    |    |

**Attachment LAT-2**  
**Page 26 of 45**

PDF Page 79 of 128

Attachment LAT-2  
Page 27 of 45PDF Page 80 of 128



**Attachment LAT-2**  
**Page 28 of 45**

PDF Page 81 of 128

Direct Testimony of L. Tomczyk  
Petitioner's Exhibit 2

Depreciation Normalization LAT WP-14

|          | A                          | B         | C                                       | D                         | F                      | G                         | H                          | I                       | J                             | K                               | L                         | M                      | N                      | O                          | P                          | Q                          | R                       | S | T | U | V | W | X | Y | Z | AA | AB |  |
|----------|----------------------------|-----------|---|---------------------------|------------------------|---------------------------|----------------------------|-------------------------|-------------------------------|---------------------------------|---------------------------|------------------------|------------------------|----------------------------|----------------------------|----------------------------|-------------------------|---|---|---|---|---|---|---|---|----|----|--|
| Line No. | DEPRECIATION NORMALIZATION |           |   |                           |                        |                           |                            |                         |                               |                                 |                           |                        |                        |                            |                            |                            |                         |   |   |   |   |   |   |   |   |    |    |  |
| 1        |                            |           |   |                           |                        |                           |                            |                         |                               |                                 |                           |                        |                        |                            |                            |                            |                         |   |   |   |   |   |   |   |   |    |    |  |
| 2        |                            | ACCT. NO. | Source Document                         | GROSS PLANT<br>YE 9/30/18 | DEPR EXP<br>YE 9/30/19 | GROSS PLANT<br>YE 9/30/19 | DEPR RESERVE<br>YE 9/30/19 | NET PLANT<br>YE 9/30/19 | Normalized<br>Plant Additions | Normalized<br>Plant Retirements | GROSS PLANT<br>YE 9/30/20 | GROSS PLANT<br>Average | DEPR RATE<br>Test Year | DEPRECIATION<br>ADJUSTMENT | NORMALIZED<br>DEPRECIATION | DEPR RESERVE<br>YE 9/30/20 | DEPR RESERVE<br>Average |   |   |   |   |   |   |   |   |    |    |  |
| 3        | WWVS                       | 31000     | Source Document 16, WP 9, WP 10, WP 15, | 80,644.08                 |                        | 80,644.08                 | 0.00                       | 80,644.08               | 0.00                          | 0.00                            | 80,644.08                 | 80,644.08              | 0.00%                  | 0.00                       | 0.00                       | 0.00                       | 0.00                    |   |   |   |   |   |   |   |   |    |    |  |
| 4        |                            | 31100     | Source Document 16, WP 9, WP 10, WP 15  | 2,848,645.48              | 56,984.30              | 2,848,645.48              | 2,801,702.54               | 46,942.94               | 0.00                          | 0.00                            | 2,848,645.48              | 2,848,645.48           | 2.00%                  | (10,041.37)                | 46,942.94                  | 2,848,645.48               | 2,848,645.48            |   |   |   |   |   |   |   |   |    |    |  |
| 5        |                            | 31200     | Source Document 16, WP 9, WP 10, WP 15  | 24,874,229.02             | 475,568.43             | 24,874,229.02             | 24,874,229.02              | (0.00)                  | 0.00                          | 0.00                            | 24,874,229.02             | 24,874,229.02          | 0.00%                  | (475,568.44)               | (0.00)                     | 24,874,229.02              | 24,874,229.02           |   |   |   |   |   |   |   |   |    |    |  |
| 6        |                            | 31400     | Source Document 16, WP 9, WP 10, WP 15  | 12,493,389.51             | 0.00                   | 12,493,389.51             | 12,493,389.51              | 0.00                    | 0.00                          | 0.00                            | 12,493,389.51             | 12,493,389.51          | 0.00%                  | 0.00                       | 0.00                       | 12,493,389.51              | 12,493,389.51           |   |   |   |   |   |   |   |   |    |    |  |
| 7        |                            | 31440     | Source Document 16, WP 9, WP 10, WP 15  | 119,062.55                | 3,571.88               | 119,062.55                | 117,355.84                 | 1,706.71                | 0.00                          | (0.00)                          | 119,062.55                | 119,062.55             | 3.00%                  | (1,865.17)                 | 1,706.71                   | 119,062.55                 | 119,062.55              |   |   |   |   |   |   |   |   |    |    |  |
| 8        |                            | 31500     | Source Document 16, WP 9, WP 10, WP 15  | 2,282,709.79              | 0.00                   | 2,282,709.79              | 2,282,709.79               | 0.00                    | 0.00                          | 0.00                            | 2,282,709.79              | 2,282,709.79           | 0.00%                  | 0.00                       | 0.00                       | 2,282,709.79               | 2,282,709.79            |   |   |   |   |   |   |   |   |    |    |  |
| 9        |                            | 31600     | Source Document 16, WP 9, WP 10, WP 15  | 9,516,266.25              | 333,107.38             | 9,516,266.25              | 3,965,385.94               | 5,550,880.31            | 0.00                          | 0.00                            | 9,516,266.25              | 9,516,266.25           | 3.50%                  | 0.00                       | 333,107.38                 | 4,298,493.32               | 4,131,939.63            |   |   |   |   |   |   |   |   |    |    |  |
| 10       |                            | 34600     | Source Document 16, WP 9, WP 10, WP 15  | 880,799.58                | 30,831.51              | 880,799.58                | 449,626.17                 | 431,173.41              | 0.00                          | 0.00                            | 880,799.58                | 880,799.58             | 3.50%                  | 0.00                       | 30,831.51                  | 480,457.67                 | 465,041.92              |   |   |   |   |   |   |   |   |    |    |  |
| 11       | SUB-TOTAL                  |           |   | 53,095,746.26             | 900,063.51             | 53,095,746.26             | 46,984,398.81              | 6,111,347.45            | 0.00                          | 0.00                            | 53,095,746.26             | 53,095,746.26          |                        | (487,474.97)               | 412,588.53                 | 47,396,987.34              | 47,215,017.90           |   |   |   |   |   |   |   |   |    |    |  |
| 12       | TRANSMISSION               | 35000     | Source Document 16, WP 9, WP 10, WP 15  | 568,604.44                | 0.00                   | 568,640.69                | 0.00                       | 568,640.69              | 0.00                          | 0.00                            | 568,640.69                | 568,640.69             | 0.00%                  | 0.00                       | 0.00                       | 0.00                       | 0.00                    |   |   |   |   |   |   |   |   |    |    |  |
| 13       |                            | 35200     | Source Document 16, WP 9, WP 10, WP 15  | 560,359.40                | 8,405.39               | 560,359.40                | 423,998.61                 | 136,360.79              | 0.00                          | (0.00)                          | 560,359.40                | 560,359.40             | 1.50%                  | 0.00                       | 8,405.39                   | 432,404.00                 | 428,201.31              |   |   |   |   |   |   |   |   |    |    |  |
| 14       |                            | 35300     | Source Document 16, WP 9, WP 10, WP 15  | 2,220,833.46              | 84,652.97              | 2,484,495.07              | 1,230,524.70               | 1,253,970.37            | 0.00                          | (0.00)                          | 2,484,495.07              | 2,484,495.07           | 3.50%                  | 2,314.29                   | 86,967.27                  | 1,317,491.97               | 1,274,008.34            |   |   |   |   |   |   |   |   |    |    |  |
| 15       |                            | 35310     | Source Document 16, WP 9, WP 10, WP 15  | 2,958,505.65              | 103,559.53             | 2,958,505.65              | 1,730,913.76               | 1,227,591.89            | 0.00                          | (0.00)                          | 2,958,505.65              | 2,958,505.65           | 3.50%                  | 0.00                       | 103,559.53                 | 1,834,473.29               | 1,782,693.53            |   |   |   |   |   |   |   |   |    |    |  |
| 16       |                            | 35320     | Source Document 16, WP 9, WP 10, WP 15  | 2,807,177.18              | 0.00                   | 2,807,177.18              | 2,807,177.18               | 0.00                    | 0.00                          | 0.00                            | 2,807,177.18              | 2,807,177.18           | 0.00%                  | 0.00                       | 0.00                       | 2,807,177.18               | 2,807,177.18            |   |   |   |   |   |   |   |   |    |    |  |
| 17       |                            | 35325     | Source Document 16, WP 9, WP 10, WP 15  | 3,545,628.84              | 124,375.21             | 3,555,685.66              | 1,520,626.13               | 2,035,059.53            | 0.00                          | 0.00                            | 3,555,685.66              | 3,555,685.66           | 3.50%                  | 88.01                      | 124,463.22                 | 1,645,089.35               | 1,582,857.74            |   |   |   |   |   |   |   |   |    |    |  |
| 18       |                            | 35330     | Source Document 16, WP 9, WP 10, WP 15  | 2,299,789.58              | 80,853.36              | 2,313,179.58              | 744,631.84                 | 1,568,547.74            | 0.00                          | 0.00                            | 2,313,179.58              | 2,313,179.58           | 3.50%                  | 117.18                     | 80,970.54                  | 825,602.38                 | 785,117.11              |   |   |   |   |   |   |   |   |    |    |  |
| 19       |                            | 35340     | Source Document 16, WP 9, WP 10, WP 15  | 2,635,117.82              | 92,239.66              | 2,635,117.82              | 1,442,831.16               | 1,192,286.66            | 0.00                          | 0.00                            | 2,635,117.82              | 2,635,117.82           | 3.50%                  | 0.00                       | 92,239.66                  | 1,535,070.83               | 1,488,951.00            |   |   |   |   |   |   |   |   |    |    |  |
| 20       |                            | 35350     | Source Document 16, WP 9, WP 10, WP 15  | 34,448.59                 | 1,205.84               | 34,448.59                 | 20,603.98                  | 13,844.61               | 0.00                          | 0.00                            | 34,448.59                 | 34,448.59              | 3.50%                  | 0.00                       | 1,205.84                   | 21,809.82                  | 21,206.90               |   |   |   |   |   |   |   |   |    |    |  |
| 21       |                            | 35360     | Source Document 16, WP 9, WP 10, WP 15  | 1,328,627.03              | 46,553.20              | 1,330,377.03              | 796,238.28                 | 534,138.75              | 0.00                          | (0.00)                          | 1,330,377.03              | 1,330,377.03           | 3.50%                  | 15.31                      | 46,568.52                  | 842,806.80                 | 819,522.54              |   |   |   |   |   |   |   |   |    |    |  |
| 22       |                            | 35370     | Source Document 16, WP 9, WP 10, WP 15  | 689,261.21                | 24,136.47              | 689,730.00                | 516,481.41                 | 173,248.59              | 0.00                          | (0.00)                          | 689,730.00                | 689,730.00             | 3.50%                  | 6.84                       | 24,143.31                  | 540,624.72                 | 528,553.06              |   |   |   |   |   |   |   |   |    |    |  |
| 23       |                            | 35380     | Source Document 16, WP 9, WP 10, WP 15  | 51,713.60                 | 3,216.60               | 105,285.45                | 22,933.33                  | 82,352.12               | 0.00                          | 0.00                            | 105,285.45                | 105,285.45             | 3.50%                  | 468.81                     | 3,685.41                   | 26,618.74                  | 24,776.04               |   |   |   |   |   |   |   |   |    |    |  |
| 24       |                            | 35385     | Source Document 16, WP 9, WP 10, WP 15  | 0.00                      | 0.00                   | 0.00                      | 0.00                       | 0.00                    | 0.00                          | 0.00                            | 0.00                      | 0.00                   | 0.00%                  | 0.00                       | 0.00                       | 0.00                       | 0.00                    |   |   |   |   |   |   |   |   |    |    |  |
| 25       |                            | 35390     | Source Document 16, WP 9, WP 10, WP 15  | 248,422.72                | 8,695.79               | 248,422.72                | 151,233.90                 | 97,188.82               | 0.00                          | (0.00)                          | 248,422.72                | 248,422.72             | 3.50%                  | 0.00                       | 8,695.79                   | 159,929.69                 | 155,581.80              |   |   |   |   |   |   |   |   |    |    |  |
| 26       |                            | 35395     | Source Document 16, WP 9, WP 10, WP 15  | 2,381,777.82              | 83,371.75              | 2,381,777.82              | 825,587.42                 | 1,556,190.40            | 0.00                          | (0.00)                          | 2,381,777.82              | 2,381,777.82           | 3.50%                  | 0.00                       | 83,371.75                  | 908,959.17                 | 867,273.29              |   |   |   |   |   |   |   |   |    |    |  |
| 27       |                            | 35400     | Source Document 16, WP 9, WP 10, WP 15  | 320,801.28                | 6,417.31               | 320,801.28                | 122,218.50                 | 198,582.78              | 0.00                          | 0.00                            | 320,801.28                | 320,801.28             | 2.00%                  | 0.00                       | 6,417.31                   | 128,635.81                 | 125,427.16              |   |   |   |   |   |   |   |   |    |    |  |
| 28       |                            | 35500     | Source Document 16, WP 9, WP 10, WP 15  | 3,626,556.98              | 108,796.71             | 3,626,556.98              | 2,588,671.90               | 1,037,885.08            | 0.00                          | 2,209.38                        | 3,624,347.60              | 3,625,452.29           | 3.00%                  | (33.14)                    | 108,763.57                 | 2,695,226.08               | 2,641,948.99            |   |   |   |   |   |   |   |   |    |    |  |
| 29       |                            | 35600     | Source Document 16, WP 9, WP 10, WP 15  | 2,028,655.76              | 40,581.23              | 2,028,655.76              | 1,230,116.74               | 798,539.02              | 0.00                          | 457.54                          | 2,028,198.22              | 2,028,426.99           | 2.00%                  | (4.58)                     | 40,576.65                  | 1,270,235.85               | 1,250,176.30            |   |   |   |   |   |   |   |   |    |    |  |
| 30       |                            | 35700     | Source Document 16, WP 9, WP 10, WP 15  | 71,268.99                 | 1,781.52               | 71,273.15                 | 24,061.05                  | 47,212.10               | 0.00                          | 0.00                            | 71,273.15                 | 71,273.15              | 2.50%                  | 0.02                       | 1,781.54                   | 25,842.60                  | 24,951.82               |   |   |   |   |   |   |   |   |    |    |  |
| 31       |                            | 35800     | Source Document 16, WP 9, WP 10, WP 15  | 228,677.80                | 5,716.03               | 228,677.80                | 156,913.11                 | 71,764.69               | 0.00                          | (0.00)                          | 228,677.80                | 228,677.80             | 2.50%                  | 0.00                       | 5,716.03                   | 162,629.14                 | 159,771.13              |   |   |   |   |   |   |   |   |    |    |  |
| 32       |                            | 35900     | Source Document 16, WP 9, WP 10, WP 15  | 782.68                    | 0.00                   | 782.68                    | 782.68                     | 0.00                    | 0.00                          | 0.00                            | 782.68                    | 782.68                 | 0.00%                  | 0.00                       | 0.00                       | 782.68                     | 782.68                  |   |   |   |   |   |   |   |   |    |    |  |
| 33       | SUB-TOTAL                  |           |   | 28,607,010.83             | 824,558.59             | 28,949,950.31             | 16,356,545.70              | 12,593,404.61           | 0.00                          | 2,666.93                        | 28,947,283.38             | 28,948,616.85          |                        | 2,972.74                   | 827,531.33                 | 17,181,410.11              | 16,768,977.90           |   |   |   |   |   |   |   |   |    |    |  |
| 34       | DISTRIBUTION               | 36000     | Source Document 16, WP 9, WP 10, WP 15  | 239,523.66                | 0.00                   | 240,162.66                | 0.00                       | 240,162.66              | 0.00                          | 0.00                            | 240,162.66                | 240,162.66             | 0.00%                  | 0.00                       | 0.00                       | 0.00                       | 0.00                    |   |   |   |   |   |   |   |   |    |    |  |
| 35       |                            | 36100     | Source Document 16, WP 9, WP 10, WP 15  | 915,720.40                | 20,696.52              | 921,220.40                | 649,542.42                 | 271,677.98              | 0.00                          | 0.00                            | 921,220.40                | 921,220.40             | 2.25%                  | 30.94                      | 20,727.46                  | 670,269.88                 | 659,906.15              |   |   |   |   |   |   |   |   |    |    |  |
| 36       |                            | 36200     | Source Document 16, WP 9, WP 10, WP 15  | 8,796,393.56              | 0.00                   | 8,796,393.56              | 8,796,393.56               | 0.00                    | 200,000.00                    | 0.00                            | 8,996,393.56              | 8,996,393.56           | 0.00%                  | 0.00                       | 0.00                       | 8,796,393.56               | 8,796,393.56            |   |   |   |   |   |   |   |   |    |    |  |
| 37       |                            | 36300     | Source Document 16, WP 9, WP 10, WP 15  | 72,170.20                 | 3,608.80               | 72,170.20                 | 39,975.60                  | 32,194.60               | 0.00                          | 0.00                            | 72,170.20                 | 72,170.20              | 5.00%                  | 0.00                       | 3,608.80                   | 43,584.40                  | 41,780.00               |   |   |   |   |   |   |   |   |    |    |  |
| 38       |                            | 36400     | Source Document 16, WP 9, WP 10, WP 15  | 12,988,964.02             | 396,766.89             | 13,337,843.00             | 8,241,879.38               | 5,095,963.62            | 400,000.00                    | 10,167.58                       | 13,727,675.42             | 13,532,759.21          | 3.00%                  | 9,215.88                   | 405,982.78                 | 8,637,694.57               | 8,439,786.98            |   |   |   |   |   |   |   |   |    |    |  |
| 39       |                            | 36500     | Source Document 16, WP 9, WP 10, WP 15  | 11,724,291.83             | 356,724.25             | 11,957,985.48             | 8,156,509.67               | 3,801,475.81            | 0.00                          | 8,365.45                        | 11,949,620.03             | 11,953,802.75          | 3.00%                  | 1,889.83                   | 358,614.08                 | 8,506,758.30               | 8,331,633.98            |   |   |   |   |   |   |   |   |    |    |  |
| 40       |                            | 36600     | Source Document 16, WP 9, WP 10, WP 15  | 8,337,627.86              | 142,452.87             | 8,647,174.03              | 5,965,885.89               | 2,681,288.14            | 500,000.00                    | 119.18                          | 9,147,054.05              | 8,997,114.44           | 1.67%                  | 5,844.23                   | 148,297.10                 | 2,829,466.07               | 2,755,377.10            |   |   |   |   |   |   |   |   |    |    |  |
| 41       |                            | 36700     | Source Document 16, WP 9, WP 10, WP 15  | 9,594,628.07              | 251,956.06             | 10,275,758.17             | 4,836,998.57               | 5,438,759.60            | 0.00                          | 392.05                          | 10,275,366.12             | 10,275,562.14          | 2.50%                  | 4,891.89                   | 256,847.95                 | 5,093,454.47               | 4,965,226.52            |   |   |   |   |   |   |   |   |    |    |  |
| 42       |                            | 36810     | Source Document 16, WP 9, WP 10, WP 15  | 4,259,102.64              | 137,873.42             | 4,230,489.27              | 3,756,265.65               | 474,223.62              | 0.00                          | 32,822.37                       | 4,197,666.90              | 4,214,078.08           | 3.25%                  | (932.73)                   | 136,940.68                 | 3,860,383.96               | 3,808,324.38            |   |   |   |   |   |   |   |   |    |    |  |
| 43       |                            | 36820     | Source Document 16, WP 9, WP 10, WP 15  | 6,734,880.79              | 218,160.26             | 6,745,739.49              | 4,520,666.64               | 2,225,072.85            | 0.00                          | 12,381.64                       | 6,733,357.85              | 6,739,548.67           | 3.25%                  | 848.11                     | 219,008.37                 | 4,727,293.37               | 4,623,980.01            |   |   |   |   |   |   |   |   |    |    |  |
| 44       |                            | 36910     | Source Document 16, WP 9, WP 10, WP 15  | 4,939,331.77              | 148,677.81             | 4,961,458.81              | 4,155,348.90               | 806,109.91              | 52,500.00                     | 228.85                          | 5,013,729.96              | 4,987,594.39           | 3.00%                  | 950.02                     | 149,627.83                 | 4,304,747.88               | 4,230,048.39            |   |   |   |   |   |   |   |   |    |    |  |
| 45       |                            | 36920     | Source Document 16, WP 9, WP 10, WP 15  | 2,788,734.44              | 84,111.16              | 2,809,084.74              | 1,534,194.28               | 1,274,890.46            | 0.00                          | 836.58                          | 2,808,246.16              | 2,808,666.45           | 3.00%                  | 148.84                     | 84,259.99                  | 1,617,617.69               | 1,575,905.98            |   |   |   |   |   |   |   |   |    |    |  |
| 46       |                            | 37000     | Source Document 16, WP 9, WP 10, WP 15  | 6,009,741.07              | 182,212.47             | 6,125,033.14              | 4,260,494.38               | 4,864,538.76            | 568,750.00                    | 121,783.91                      | 6,571,999.23              | 6,348,516.18           | 3.00%                  | 8,243.01                   | 190,455.49                 | 1,329,165.96               | 1,294,830.17            |   |   |   |   |   |   |   |   |    |    |  |
| 47       |                            | 37100     | Source Document 16, WP 9, WP 10, WP 15  | 986,163.09                | 36,172.20              | 1,063,774.30              | 723,390.60                 | 340,383.70              | 0.00                          | 134.62                          | 1,063,639.68              | 1,063,706.99           | 3.50%                  | 1,061.80                   | 37,234.00                  | 760,489.99                 | 741,940.29              |   |   |   |   |   |   |   |   |    |    |  |
| 48       |                            | 37310     | Source Document 16, WP 9, WP 10, WP 15  | 2,525,636.60              | 2,307.89               | 2,527,840.77              | 2,527,786.07               | 54.70                   | 60,000.00                     | 2,362.75                        | 2,585,478.02              | 2,556,659.40           | 0.13%                  | (2,253.19)                 | 54.70                      | 2,525,478.02               | 2,526,632.05            |   |   |   |   |   |   |   |   |    |    |  |
| 49       |                            | 37320     | Source Document 16, WP 9, WP 10, WP 15  | 1,487,934.94              | 18,865.83              | 1,514,557.73              | 1,506,800.77               | 7,756.96                | 0.00                          | 1.61                            | 1,514,556.12              | 1,514,556.92           | 3.50%                  | (11,108.87)                | 7,756.96                   | 1,514,556.12               | 1,510,678.44            |   |   |   |   |   |   |   |   |    |    |  |
| 50       | SUB-TOTAL                  |           |   | 82,300,844.94             | 2,000,586.44           | 84,226,685.75             | 53,387,534.63              | 30,839,151.12           | 1,781,250.00                  | 189,596.60                      | 85,818,339.15             | 85,022,512.45          |                        | 18,829.76                  | 2,019,416.20               | 55,217,354.22              | 54,302,444.42           |   |   |   |   |   |   |   |   |    |    |  |
| 51       | GENERAL PLANT              | 38900     | Source Document 16, WP 9, WP 10, WP 15  | 49,037.75                 | 0.00                   | 49,037.75                 | 0.00                       | 49,037.75               | 0.00                          | 0.00                            | 49,037.75                 | 49,037.75              | 0.00%                  | 0.00                       | 0.00                       | 0.00                       | 0.00                    |   |   |   |   |   |   |   |   |    |    |  |
| 52       |                            | 39000     | Source Document 16, WP 9, WP 10, WP 15  | 645,528.82                | 13,812.00              | 705,439.33                | 32,295.83                  | 733,143.50              | 311,720.00                    | 0.00                            | 1,017,159.33              |                        |                        |                            |                            |                            |                         |   |   |   |   |   |   |   |   |    |    |  |

Direct Testimony of L. Tomczyk  
Petitioner's Exhibit 2

Depreciation Normalization LAT WP-14

|          | A                          | B                                      | C | D                         | F                      | G                         | H                          | I                       | J                             | K                               | L                         | M                      | N                      | O                          | P                          | Q                          | R                       | S              | T | U | V | W | X | Y | Z | AA | AB |  |
|----------|----------------------------|--|---|---------------------------|------------------------|---------------------------|----------------------------|-------------------------|-------------------------------|---------------------------------|---------------------------|------------------------|------------------------|----------------------------|----------------------------|----------------------------|-------------------------|----------------|---|---|---|---|---|---|---|----|----|--|
| Line No. | DEPRECIATION NORMALIZATION |  |   |                           |                        |                           |                            |                         |                               |                                 |                           |                        |                        |                            |                            |                            |                         |                |   |   |   |   |   |   |   |    |    |  |
| 1        |                            |  |   |                           |                        |                           |                            |                         |                               |                                 |                           |                        |                        |                            |                            |                            |                         |                |   |   |   |   |   |   |   |    |    |  |
| 2        | ACCT. NO.                  | Source Document                        |   | GROSS PLANT<br>YE 9/30/18 | DEPR EXP<br>YE 9/30/19 | GROSS PLANT<br>YE 9/30/19 | DEPR RESERVE<br>YE 9/30/19 | NET PLANT<br>YE 9/30/19 | Normalized<br>Plant Additions | Normalized<br>Plant Retirements | GROSS PLANT<br>YE 9/30/20 | GROSS PLANT<br>Average | DEPR RATE<br>Test Year | DEPRECIATION<br>ADJUSTMENT | NORMALIZED<br>DEPRECIATION | DEPR RESERVE<br>YE 9/30/20 | DEPR RESERVE<br>Average |                |   |   |   |   |   |   |   |    |    |  |
| 59       | 39300                      | Source Document 16, WP 9, WP 10, WP 15 |   | 54,876.66                 | 2,194.85               | 54,876.66                 | 50,851.99                  | 4,024.67                | 6,000.00                      | 0.00                            | 60,876.66                 | 57,876.66              | 4.00%                  | 119.99                     |                            | 2,314.83                   | 53,166.83               | 52,009.41      |   |   |   |   |   |   |   |    |    |  |
| 60       | 39400                      | Source Document 16, WP 9, WP 10, WP 15 |   | 1,373,408.26              | 55,400.29              | 1,389,058.38              | 1,084,050.81               | 305,007.57              | 3,750.00                      | 118.07                          | 1,392,690.31              | 1,390,874.34           | 4.00%                  | 229.12                     |                            | 55,629.41                  | 1,139,562.15            | 0.00           |   |   |   |   |   |   |   |    |    |  |
| 61       | 39500/39510                | Source Document 16, WP 9, WP 10, WP 15 |   | 841,268.75                | 17,217.08              | 855,172.69                | 851,750.49                 | 3,422.20                | 30,000.00                     | 9,133.28                        | 876,039.41                | 865,606.05             | 4.00%                  | (13,794.89)                |                            | 3,422.20                   | 846,039.41              | 848,894.95     |   |   |   |   |   |   |   |    |    |  |
| 62       | 39600                      | Source Document 16, WP 9, WP 10, WP 15 |   | 1,598,583.47              | 79,935.57              | 1,598,583.47              | 1,537,923.37               | 60,660.10               | 23,950.00                     | 0.00                            | 1,622,533.47              | 1,610,558.47           | 5.00%                  | (19,275.47)                |                            | 60,660.10                  | 1,598,583.47            | 1,568,253.42   |   |   |   |   |   |   |   |    |    |  |
| 63       | 39700/39710                | Source Document 16, WP 9, WP 10, WP 15 |   | 4,544,904.01              | 182,427.53             | 4,590,171.95              | 3,714,828.45               | 875,343.50              | 36,500.00                     | 544.70                          | 4,626,127.25              | 4,608,149.60           | 4.00%                  | 1,880.02                   |                            | 184,307.55                 | 3,898,591.29            | 3,806,709.87   |   |   |   |   |   |   |   |    |    |  |
| 64       | 39800                      | Source Document 16, WP 9, WP 10, WP 15 |   | 338,449.69                | 13,979.42              | 353,210.87                | 308,842.52                 | 44,368.35               | 84,750.00                     | 0.00                            | 437,960.87                | 395,585.87             | 4.00%                  | 1,842.43                   |                            | 15,821.85                  | 324,664.37              | 316,753.45     |   |   |   |   |   |   |   |    |    |  |
| 65       | 39900                      | Source Document 16, WP 9, WP 10, WP 15 |   | 85,873.42                 | 0.00                   | 85,873.42                 | 82,507.17                  | 3,366.25                | 0.00                          | 0.00                            | 85,873.42                 | 85,873.42              | 0.00%                  | 0.00                       |                            | 0.00                       | 82,507.17               | 82,507.17      |   |   |   |   |   |   |   |    |    |  |
| 66       | SUB-TOTAL                  |  |   | 25,381,428.99             | 859,636.41             | 25,954,429.93             | 20,682,767.69              | 5,271,662.24            | 1,783,295.00                  | 270,764.51                      | 27,466,960.42             | 26,710,695.17          |                        | (63,176.28)                |                            | 796,460.13                 | 21,208,463.30           | 19,833,809.01  |   |   |   |   |   |   |   |    |    |  |
| 67       |                            |  |   | =====                     | =====                  | =====                     | =====                      | =====                   | =====                         | =====                           | =====                     | =====                  |                        | =====                      |                            | =====                      | =====                   | =====          |   |   |   |   |   |   |   |    |    |  |
| 68       | GRAND TOTAL                |  |   | 189,385,031.02            | 4,584,844.95           | 192,226,812.25            | 137,411,246.82             | 54,815,565.43           | 3,564,545.00                  | 463,028.04                      | 195,328,329.21            | 193,777,570.73         |                        | (528,848.75)               |                            | 4,055,996.19               | 141,004,214.97          | 138,120,249.23 |   |   |   |   |   |   |   |    |    |  |

Direct Testimony of L. Tomczyk  
Petitioner's Exhibit 2

| Projected Depreciation Expense LAT WP-15 |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|--|------------------|---|---|---|---|---|-----------------|-------------------|--------------------|-----------------|-------------------|--------------------|--------------------|---------------------|--------------------|---------------------|----------|---------------------|--------------------|-----------|-------------------|--------------|-----------------------|-------------------------|
|  | A                | B | C | D | E | F | AJ              | AK                | AL                 | AN              | AO                | AP                 | AQ                 | AR                  | AS                 | AT                  | AU       | AV                  | AW                 | AX        | AY                | AZ           | BA                    |                         |
| Line No.                                 | PLANT IN SERVICE |   |   |   |   |   | PLANT<br>Actual | RESERVE<br>Actual | NET BOOK<br>Actual | PLANT<br>Actual | RESERVE<br>Actual | NET BOOK<br>Actual | DEPR EXP<br>Actual | NET PLANT<br>Actual | ADDS NET<br>Actual | RSRV ADDS<br>Actual | DEPR EXP | NET PLANT<br>Actual | ADDS NET<br>Actual | RSRV ADDS | DEPR EXP<br>RATIO | DEPR<br>RATE | Retirement<br>Average | Retirement<br>Average % |
|  | Source Documents |   |   |   |   |   | YE 9/30/19      | YE 9/30/19        | YE 9/30/19         | YE 9/30/19      | YE 9/30/19        | YE 9/30/19         | YE 9/30/19         | YE 9/30/19          | YE 9/30/19         | YE 9/30/19          | Average  | Average             | Average            | Average   | Average           | Average      | Average %             |                         |
|  | ACCT. NO.        |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |
|  |                  |   |   |   |   |   |                 |                   |                    |                 |                   |                    |                    |                     |                    |                     |          |                     |                    |           |                   |              |                       |                         |

| FY 2019 and FY 2020 Budgeted Capital Expenditures LAT WP-16 |   |                            |                  |                  |                 |
|---|---|----------------------------|------------------|------------------|-----------------|
| Line No.  | A<br>Category   | B<br>Source                | C<br>2019 Budget | D<br>2020 Budget | E<br>Normalized |
| 1   |   |                            |                  |                  |                 |
| 2   | <b>Meter Department</b>   |                            |                  |                  |                 |
| 3   | Watt-hour Meters / Single Phase   | Source Documents 15 and 17 | \$200,000        | \$400,000        | \$350,000       |
| 4   | Watt-hour Meters / Poly Phase   | Source Documents 15 and 17 | 200,000          | 200,000          | \$200,000       |
| 5   | Meter Bases / Cabinets / Auxiliary Equipment                                  | Source Documents 15 and 17 | 10,000           | 10,000           | \$10,000        |
| 6   | Instrument Transformers   | Source Documents 15 and 17 | 5,000            | 10,000           | \$8,750         |
| 7   | Power Quality Monitoring Equipment  | Source Documents 15 and 17 | 30,000           | 30,000           | \$30,000        |
| 8   | Reader / Programmer Laptop Replacements                                       | Source Documents 15 and 17 | 5,000            | 6,000            | \$5,750         |
| 9   | AMI System Infrastructure Equipment   | Source Documents 15 and 17 | 6,000            | 25,000           | \$20,250        |
| 10  | Replace Vehicle #18 - 2008 Honda Civic Hybrid Car                             | Source Documents 15 and 17 | 25,000           |                  | \$6,250         |
| 11  | Replace Vehicle #21 - 2003 Ford E-250 Cargo Van                               | Source Documents 15 and 17 | -                | 42,000           | \$31,500        |
| 12  |   |                            | \$481,000        | \$723,000        | \$662,500       |
| 13  | <b>Annual Construction Projects</b>   |                            |                  |                  |                 |
| 14  | City Street Lighting  | Source Documents 15 and 17 | \$60,000         | \$60,000         | \$60,000        |
| 15  | System Modifications & Rebuilds   | Source Documents 15 and 17 | 500,000          | 500,000          | \$500,000       |
| 16  | Line Extensions for New Loads   | Source Documents 15 and 17 | 400,000          | 400,000          | \$400,000       |
| 17  | Miscellaneous Substation Modifications  | Source Documents 15 and 17 | 200,000          | 200,000          | \$200,000       |
| 18  |   |                            | \$1,160,000      | \$1,160,000      | \$1,160,000     |
| 19  | <b>Line Department</b>  |                            |                  |                  |                 |
| 20  | Replace Unit #222 - 2006 Bobcat 430 HAG Mini Excavator                        | Source Documents 15 and 17 | 70,000           |                  | \$17,500        |
| 21  | Replace Unit #24 - 2008 Ford F750 Super Duty Digger / Derrick                 | Source Documents 15 and 17 | 240,000          |                  | \$60,000        |
| 22  | Replace Unit #120 - 1995 Sherman Reilly UnderDawg Underground Cable Puller    | Source Documents 15 and 17 | 95,000           |                  | \$23,750        |
| 23  | Single Reel Innerduct / Wire Dolly  | Source Documents 15 and 17 | 15,000           |                  | \$3,750         |
| 24  | Replace Vehicle #40 - 2010 Ford F150 Crew Cab 4x4 Pickup Truck                | Source Documents 15 and 17 |                  | 48,000           | \$36,000        |
| 25  | Replace Vehicle #1358 - 2014 Freightliner 114SD Vacuum Excavator              | Source Documents 15 and 17 |                  | 380,000          | \$285,000       |
| 26  | Replace Vehicle #24 - 2008 Ford F750 Super Duty Digger / Derrick (difference) | Source Documents 15 and 17 |                  | 30,000           | \$22,500        |
| 27  |   |                            |                  |                  | \$0             |
| 28  |   |                            | \$ 420,000       | \$ 458,000       | \$ 448,500      |
| 29  | <b>General Manager/Assistant General Manager Departments</b>                  |                            |                  |                  |                 |
| 30  | Vehicle for Company Use   | Source Documents 15 and 17 | \$ 30,000        |                  | \$7,500         |
| 31  | Micro Turbine / Distributed Generation Pilot                                  | Source Documents 15 and 17 |                  | \$ 100,000       | \$75,000        |
| 32  | Electrical Vehicle Charging Stations Pilot                                    | Source Documents 15 and 17 |                  | \$ 70,000        | \$52,500        |
| 33  |   |                            | \$ 30,000        | \$ 170,000       | \$ 135,000      |
| 34  | <b>Safety Department</b>  |                            |                  |                  |                 |
| 35  | Arc Flash Study at Service Building   | Source Documents 15 and 17 | \$ 15,000        |                  | \$3,750         |
| 36  | AED Devices (31)  | Source Documents 15 and 17 | 39,000           |                  | \$9,750         |
| 37  |   |                            | \$ 54,000        | \$ -             | \$ 13,500       |
| 38  | <b>Buildings &amp; Grounds Department</b>                                     |                            |                  |                  |                 |
| 39  | Air Conditioning Units at Customer Service Office                             | Source Documents 15 and 17 | \$36,000         |                  | \$9,000         |
| 40  | Overhead Doors and Operators  | Source Documents 15 and 17 | 6,000            |                  | \$1,500         |
| 41  | UPS System at Service Building  | Source Documents 15 and 17 | 20,000           |                  | \$5,000         |
| 42  | HVAC System Operator SCADA Room   | Source Documents 15 and 17 | 28,880           |                  | \$7,220         |
| 43  | Driveway and Parking Lot Rebuild  | Source Documents 15 and 17 | 150,000          |                  | \$37,500        |
| 44  | Highland Substation Entrance Project  | Source Documents 15 and 17 |                  | 32,000           | \$24,000        |
| 45  | Auto Garage Roof Repairs  | Source Documents 15 and 17 |                  | 52,000           | \$39,000        |
| 46  | Johnson Street Substation HVAC  | Source Documents 15 and 17 |                  | 30,000           | \$22,500        |
| 47  | UPS & Service Building Transformer Relocation Project Design & Planning       | Source Documents 15 and 17 |                  | 25,000           | \$18,750        |
| 48  | Arc Flash Study   | Source Documents 15 and 17 |                  | 75,000           | \$56,250        |
| 49  | Security Upgrades (per recent study) - Service Building                       | Source Documents 15 and 17 |                  | 40,000           | \$30,000        |
| 50  | Security Upgrades (per recent study) - Customer Service Building              | Source Documents 15 and 17 |                  | 30,000           | \$22,500        |
| 51  |   |                            | \$240,880        | \$284,000        | \$273,220       |
| 52  | <b>Garage Department</b>  |                            |                  |                  |                 |
| 53  | Heavy Duty Wheel Lift   | Source Documents 15 and 17 |                  | \$8,600          | \$6,450         |
| 54  | <b>Storeroom Department</b>   |                            |                  |                  |                 |
| 55  | Bar Code Labeler  |                            |                  | \$8,000          | \$6,000         |
| 56  | <b>Substation Department</b>  |                            |                  |                  |                 |
| 57  | Replace Vehicle #9 - 2004 Ford Ranger 4x2 Compact Pickup Truck                | Source Documents 15 and 17 | \$ 32,000        |                  | \$8,000         |
| 58  | Replace Vehicle #22 - 2007 Chevy Avalanche 4 WD LT Sport Utility Vehicle      | Source Documents 15 and 17 |                  | \$ 45,000        | \$33,750        |
| 59  | Replace Dielectric Test Equipment   | Source Documents 15 and 17 |                  | \$ 9,500         | \$7,125         |
| 60  |   |                            | \$ 32,000        | \$ 54,500        | \$ 48,875       |
| 61  | <b>Operations Department</b>  |                            |                  |                  |                 |
| 62  | Upgrade SCADA Hardware & Software   | Source Documents 15 and 17 | \$65,000         |                  | \$16,250        |
| 63  | <b>Engineering Department</b>   |                            |                  |                  |                 |
| 64  | Replace Vehicle #34 - 2003 Ford Ranger 4x2 Compact Pickup Truck               | Source Documents 15 and 17 | \$32,000         |                  | \$8,000         |
| 65  | Replace Vehicle #70 - 2004 Ford Ranger 4x2 Compact Pickup Truck               | Source Documents 15 and 17 |                  | 30,000           | \$22,500        |
| 66  |   |                            | \$32,000         | \$30,000         | \$30,500        |
| 67  | <b>Customer Service Department</b>  |                            |                  |                  |                 |
| 68  | Customer Service Basement Remodeling  | Source Documents 15 and 17 | \$10,000         |                  | \$2,500         |
| 69  | Replace Carpeting in Staff Work Area & Steps                                  | Source Documents 15 and 17 |                  | \$7,000          | \$5,250         |
| 70  | Replace (2) Teller Drive Thru Drawers   | Source Documents 15 and 17 |                  | \$20,000         | \$15,000        |
| 71  | Replace Air Conditioning Condensing Unit                                      | Source Documents 15 and 17 |                  | \$16,000         | \$12,000        |
| 72  |   |                            | \$10,000         | \$43,000         | \$34,750        |
| 73  | <b>Human Resources Department</b>   |                            |                  |                  |                 |
| 74  | Replace Vehicle #20 - 2008 Honda Civic Hybrid Car                             | Source Documents 15 and 17 |                  | 27000            | \$20,250        |
| 75  | <b>Information Systems</b>  |                            |                  |                  |                 |
| 76  | Server Hardware   | Source Documents 15 and 17 | \$ 20,000        |                  | \$ 5,000        |
| 77  | PeopleSoft CIS Replacement  | Source Documents 15 and 17 | 1,000,000        |                  | 250,000         |
| 78  | CIS - HR - ABRA - UMS Replacement - NISC                                      | Source Documents 15 and 17 |                  | 400,000          | 300,000         |
| 79  | Radio System Replacement  | Source Documents 15 and 17 |                  | 175,000          | 131,250         |
| 80  | IT Security - Security Review & Penetration Test                              | Source Documents 15 and 17 |                  | 30,000           | 22,500          |
| 81  |   |                            | \$ 1,020,000     | \$ 605,000       | \$ 708,750      |
| 82  | <b>Total</b>  |                            | \$ 3,544,880     | \$ 3,571,100     | \$ 3,564,545    |

## Rate Base Calculations LAT WP-17

|          | A                    | B      | C             | D            | E                  | F |
|----------|----------------------|--------|---------------|--------------|--------------------|---|
| Line No. | Rate Base            | Source | Test Year     | Adjustments  | Adjusted Test Year |   |
| 1        | Net Plant In Service | WP 2   | \$ 56,101,782 | \$ (444,460) | \$ 55,657,321      |   |
| 2        | Working Capital      | WP 18  | \$ 9,397,980  | \$ 104,362   | \$ 9,502,342       |   |
| 3        | Inventories (M&S)    | WP 22  | \$ 2,206,209  | \$ -         | \$ 2,206,209       |   |
| 4        | Prepayments          | WP 22  | \$ 319,362    | \$ -         | \$ 319,362         |   |
| 5        | Total Rate Base      |        | \$ 68,025,333 | \$ (340,098) | \$ 67,685,235      |   |
| 6        | Less CIAC            | WP 22  | \$ 1,970,710  | \$ -         | \$ 1,970,710       |   |
| 7        | Adjusted Rate Base   |        | \$ 66,054,623 | \$ (340,098) | \$ 65,714,525      |   |
| 8        | ROR                  |        | -1.48%        |              | 6.59%              |   |
| 9        | Return               | WP 1   | \$ (974,486)  | \$ 5,305,073 | \$ 4,330,587       |   |

## Working Capital LAT WP-18

|          | A                                    | B      | C          | D           | E                  |
|----------|--------------------------------------|--------|------------|-------------|--------------------|
| Line No. | Category                             | Source | Test Year  | Adjustments | Adjusted Test Year |
| 1        | Unrestricted Cash                    | WP 19  | 15,091,058 | 3,653,289   | 18,744,347         |
| 2        | Annual Expense Summary               |        |            |             |                    |
| 3        | Operating & Maintenance Expenditure  | WP 1   | 75,183,843 | 834,897     | 76,018,740         |
| 4        | Taxes                                | WP 1   | 2,334,624  | 163,620     | 2,498,244          |
| 5        | Total Annual Expense Summary         |        | 75,183,843 | 834,897     | 76,018,740         |
| 6        | Expense per Day                      |        | 205,983    |             | 208,271            |
| 7        | Days Cash on Hand                    |        | 73         |             | 90                 |
| 8        | Target                               |        | 90         |             | 90                 |
| 9        | Amortized Adjustment Over Five Years |        |            |             | 730,658            |
| 10       | Minimum Working Capital (1/8 Rule)   |        | 9,397,980  | 104,362     | 9,502,342          |

## Cash Reserves for Test Year LAT WP-19

| Line No. | A                    | B                                       | C      | D               |
|----------|----------------------|---|--------|-----------------|
|          | Total Cash Reserves: |   | Source |                 |
| 1        |                      | <b>Total Restricted Cash</b>            |        |                 |
| 2        | 12650                | Depreciation Reserve Fund - Investments | WP 1   | \$ 9,924,178    |
| 3        | 12810                | Bond Reserve Fund - Cash                | WP 1   | -               |
| 4        | 12840                | Bond Reserve Fund - Investments         | WP 1   | -               |
| 5        | 12850                | Insurance Reserve Fund - Cash           | WP 1   | -               |
| 6        | 12851                | Insurance Reserve Fund - Investments    | WP 1   | 1,359,434       |
| 7        | 12930                | 2006 Bonds - Cash                       | WP 1   | -               |
| 8        | 13320                | Cash - Cash Reserve Fund                | WP 1   | 1,604,781       |
| 9        | 13450                | Employees Deferred Wages                | WP 1   | -               |
| 10       | 13460                | Cash - Consumer Deposit Fund            | WP 1   | 694,144         |
| 11       | 13470                | Cash - Payroll Deduction Fund           | WP 1   | <u>(37,094)</u> |
| 12       |                      | Total Restricted Cash                   |        | \$ 13,545,442   |
| 13       |                      | <b>Total Unrestricted Cash</b>          |        |                 |
| 14       | 13110                | Cash - Cash Operating Fund              | WP 1   | \$ 15,089,358   |
| 15       | 13500                | Cash - Working Fund                     | WP 1   | <u>1,700</u>    |
| 16       |                      | Total Unrestricted Cash                 |        | 15,091,058      |
| 17       |                      | <b>Total Net Cash Reserves</b>          |        | \$ 28,636,500   |

WP 19



|          | A                    | B                  | C                                   | D                            | E  | F                     | G                      | H   | I                   | J             | K                   | L                       | M                 | N                | O            | P      | Q      | R            | S          | T          | U     | V                            | W                              |
|----------|----------------------|--------------------|-------------------------------------|------------------------------|----|-----------------------|------------------------|-----|---------------------|---------------|---------------------|-------------------------|-------------------|------------------|--------------|--------|--------|--------------|------------|------------|-------|------------------------------|--------------------------------|
| Line No. | Billing Determinants |                    |                                     |                              |    |                       |                        |     |                     |               | Rates               |                         |                   |                  | Charges      |        |        |              |            |            |       |                              |                                |
|          |                      |                    | kWh on RP&L Bills to Large Customer | kWh on IMPA Invoices to RP&L | kW | kW - Coin w/ RPL Peak | kW - Coin w/ IMPA Peak | kVA | Demand \$/kW - Coin | Energy \$/kWh | Trans & Dist \$/kVA | ECA Demand \$/kW - Coin | ECA Energy \$/kWh | Prim. Adjustment | Power Factor | Demand | Energy | Trans & Dist | ECA Demand | ECA Energy | Total | Contribution to IMPA Peak kW | Contribution to kWh IMPA Sales |
| 1        |                      | Source             |                                     |                              |    |                       |                        |     |                     |               |                     |                         |                   |                  |              |        |        |              |            |            |       |                              |                                |
| 2        | Actual Bills         |                    |                                     |                              |    |                       |                        |     |                     |               |                     |                         |                   |                  |              |        |        |              |            |            |       |                              |                                |
| 3        | Oct-18               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 15.239272            | \$ 0.011083       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 4        | Nov-18               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 15.239272            | \$ 0.011083       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 5        | Dec-18               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 15.239272            | \$ 0.011083       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 6        | Jan-19               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.821649            | \$ 0.011080       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 7        | Feb-19               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.821649            | \$ 0.011080       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 8        | Mar-19               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.821649            | \$ 0.011080       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 9        | Apr-19               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.481015            | \$ 0.011276       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 10       | May-19               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.481015            | \$ 0.011276       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 11       | Jun-19               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.481015            | \$ 0.011276       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 12       | Jul-19               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.450569            | \$ 0.011256       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 13       | Aug-19               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.450569            | \$ 0.011256       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 14       | Sep-19               | Source Document 18 |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.450569            | \$ 0.011256       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 15       | Test Year Actual     |                    |                                     |                              |    |                       |                        |     | \$ 7.77             | \$ 0.02       | \$ 2.50             | \$ 14.652514            | \$ 0.011201       | 2%               |              |        |        |              |            |            |       |                              |                                |
| 16       | Adjusted Test Year   |                    |                                     |                              |    |                       |                        |     |                     |               |                     |                         |                   |                  |              |        |        |              |            |            |       |                              |                                |
| 17       | Oct-18               |                    |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 15.239272            | \$ 0.011083       | 2.0%             |              |        |        |              |            |            |       |                              |                                |
| 18       | Nov-18               |                    |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 15.239272            | \$ 0.011083       | 2.0%             |              |        |        |              |            |            |       |                              |                                |
| 19       | Dec-18               |                    |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 15.239272            | \$ 0.011083       | 2.0%             |              |        |        |              |            |            |       |                              |                                |
| 20       | Jan-19               |                    |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.821649            | \$ 0.011080       | 2.0%             |              |        |        |              |            |            |       |                              |                                |
| 21       | Feb-19               |                    |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.821649            | \$ 0.011080       | 2.0%             |              |        |        |              |            |            |       |                              |                                |
| 22       | Mar-19               |                    |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.821649            | \$ 0.011080       | 2.0%             |              |        |        |              |            |            |       |                              |                                |
| 23       | Apr-19               |                    |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.481015            | \$ 0.011276       | 2.0%             |              |        |        |              |            |            |       |                              |                                |
| 24       | May-19               |                    |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.481015            | \$ 0.011276       | 2.0%             |              |        |        |              |            |            |       |                              |                                |
| 25       | Jun-19               |                    |                                     |                              |    |                       |                        |     | \$ 7.77             | 0.02437       | \$ 2.50             | \$ 14.481015            | \$ 0.011276       | 2.0%             |              |        |        |              |            |            |       |                              |                                |

Large Customer Test Year Revenue Adjustment for Load Migration LAT WP-21

| Line No. | A   | B   | C         | D        | E | F | G       | H    | I   | J        | K   | L | M | N       | O    | P        | Q         | R |
|----------|---|-----|-----------|----------|---|---|---------|------|-----|----------|---|---|---|---------|------|----------|-----------|---|
| 1        | LP - Primary COIN Rate  |     |           |          |   |   |         |      |     |          | Industrial - Primary Rate   |   |   |         |      |          |           |   |
| 2        | Customer Rate Energy Rate Demand Rate T&D Rate Substation Disc Energy ECA Rate Demand KW ECA Rate Total |     |           |          |   |   |         |      |     |          | Customer Rate Energy Rate Demand Rate Energy ECA Rate Demand KVA ECA Rate Total |   |   |         |      |          |           |   |
| 3        |   |     | Quarter 1 | Jan-Mar  |   | 0 | 0.02437 | 7.77 | 2.5 | 0.35     |   |   | 0 | 0.02437 | 8.67 |          |           |   |
| 4        |   |     | Quarter 2 | Apr-Jun  |   |   |         |      |     | 0.01108  | 14.821649   |   |   |         |      | 0.01108  | 12.589064 |   |
| 5        |   |     | Quarter 3 | Jul-Sept |   |   |         |      |     | 0.011276 | 14.481015   |   |   |         |      | 0.011276 | 12.299739 |   |
| 6        |   |     | Quarter 4 | Oct-Dec  |   |   |         |      |     | 0.011256 | 14.450569   |   |   |         |      | 0.011256 | 12.273879 |   |
| 7        | Month   | kWh | kW (COIN) | kVa      |   |   |         |      |     | 0.011083 | 15.239272   |   |   |         |      | 0.011083 | 12.94378  |   |
| 8        | Oct-18  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 9        | Nov-18  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 10       | Dec-18  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 11       | Jan-19  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 12       | Feb-19  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 13       | Mar-19  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 14       | Apr-19  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 15       | May-19  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 16       | Jun-19  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 17       | Jul-19  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 18       | Aug-19  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 19       | Sep-19  |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |
| 20       | Total   |     |           |          |   |   |         |      |     |          |   |   |   |         |      |          |           |   |

| 21 | Old Revenues |              | New Revenues |              | Difference |
|----|--------------|--------------|--------------|--------------|------------|
| 22 | Month        | Rate         | Revenue      | Rate         | Revenue    |
| 23 | Oct-18       | LPP - COIN   |              | Industrial P |            |
| 24 | Nov-18       | LPP - COIN   |              | Industrial P |            |
| 25 | Dec-18       | LPP - COIN   |              | Industrial P |            |
| 26 | Jan-19       | LPP - COIN   |              | Industrial P |            |
| 27 | Feb-19       | LPP - COIN   |              | Industrial P |            |
| 28 | Mar-19       | LPP - COIN   |              | Industrial P |            |
| 29 | Apr-19       | LPP - COIN   |              | Industrial P |            |
| 30 | May-19       | LPP - COIN   |              | Industrial P |            |
| 31 | Jun-19       | LPP - COIN   |              | Industrial P |            |
| 32 | Jul-19       | LPP - COIN   |              | Industrial P |            |
| 33 | Aug-19       | LPP - COIN   |              | Industrial P |            |
| 34 | Sep-19       | Industrial P |              | Industrial P |            |
| 35 | Total        |              |              |              | (218,339)  |

Test Year Trial Balance LAT WP-22

| A        | B            | C   | D                  | E                 | F                 | G                |
|----------|--------------|---|--------------------|-------------------|-------------------|------------------|
| Line No. | Account Code | Account Title   | Source             | Beginning Balance | Net Period Change | Ending Balance   |
| 1        |              |   |                    |                   |                   |                  |
| 2        | 10500        | Property Held For Future Use                                | Source Document 19 | -                 | -                 | -                |
| 3        | 10700        | Construction Work In Progress                               | Source Document 19 | 4,697,946.58      | 2,313,424.06      | 7,011,370.64     |
| 4        | 10800        | Accumulated Provision For Depreciation                      | Source Document 19 | (133,254,011.46)  | (4,157,235.31)    | (137,411,246.77) |
| 5        | 11400        | Electric Plant Aquisition Adjustments                       | Source Document 19 | 156,661.41        | -                 | 156,661.41       |
| 6        | 11500        | Accumulated Provision for Amortization of Plant Adjustments | Source Document 19 | (156,661.41)      | -                 | (156,661.41)     |
| 7        | 12610        | Depreciation Reserve Fund - Cash                            | Source Document 19 | -                 | -                 | -                |
| 8        | 12650        | Depreciation Reserve Fund - Investments                     | Source Document 19 | 9,914,625.11      | 9,552.88          | 9,924,177.99     |
| 9        | 12810        | Bond Reserve Fund - Cash                                    | Source Document 19 | -                 | -                 | -                |
| 10       | 12840        | Bond Reserve Fund - Investments                             | Source Document 19 | -                 | -                 | -                |
| 11       | 12850        | Insurance Reserve Fund - Cash                               | Source Document 19 | -                 | -                 | -                |
| 12       | 12851        | Insurance Reserve Fund - Investments                        | Source Document 19 | 1,349,354.72      | 10,078.89         | 1,359,433.61     |
| 13       | 12930        | 2006 Bonds - Cash   | Source Document 19 | -                 | -                 | -                |
| 14       | 13110        | Cash - Cash Operating Fund                                  | Source Document 19 | 15,437,416.38     | (348,058.54)      | 15,089,357.84    |
| 15       | 13320        | Cash - Cash Reserve Fund                                    | Source Document 19 | 1,604,781.45      | -                 | 1,604,781.45     |
| 16       | 13450        | Employees Deferred Wages                                    | Source Document 19 | -                 | -                 | -                |
| 17       | 13460        | Cash - Consumer Deposit Fund                                | Source Document 19 | 678,626.99        | 15,516.57         | 694,143.56       |
| 18       | 13470        | Cash - Payroll Deduction Fund                               | Source Document 19 | (13.64)           | (37,080.60)       | (37,094.24)      |
| 19       | 13480        | Cash - Payroll Fund   | Source Document 19 | -                 | -                 | -                |
| 20       | 13500        | Cash - Working Fund   | Source Document 19 | 1,700.00          | -                 | 1,700.00         |
| 21       | 13620        | Investment - Cash Reserve Fund                              | Source Document 19 | -                 | -                 | -                |
| 22       | 13660        | Investment - Consumer Deposit Fund                          | Source Document 19 | -                 | -                 | -                |
| 23       | 14210        | Accounts Receivable - Electric Sales                        | Source Document 19 | 7,142,600.56      | (268,814.77)      | 6,873,785.79     |
| 24       | 14220        | Accounts Receivable - Miscellaneous Non-Operating Sales     | Source Document 19 | 54,439.69         | (30,005.70)       | 24,433.99        |
| 25       | 14240        | Accounts Receivable - Electric Sales - Safe                 | Source Document 19 | 130,417.32        | -                 | 130,417.32       |
| 26       | 14320        | Accounts Receivable - Employees and Officers                | Source Document 19 | -                 | -                 | -                |
| 27       | 14325        | Accounts Receivable - Parallax                              | Source Document 19 | -                 | -                 | -                |
| 28       | 14330        | Accounts Receivable - Other                                 | Source Document 19 | -                 | -                 | -                |
| 29       | 14340        | Interest Receivable - Parallax                              | Source Document 19 | 577,232.36        | (720.97)          | 576,511.39       |
| 30       | 14400        | Accumulated Provision For Uncollectible Accounts            | Source Document 19 | (17,992.60)       | 747.05            | (17,245.55)      |
| 31       | 14500        | Notes Receivable - City Of Richmond                         | Source Document 19 | -                 | -                 | -                |
| 32       | 14510        | Notes Receivable - Parallax                                 | Source Document 19 | 2,548,848.60      | (56,537.71)       | 2,492,310.89     |
| 33       | 14610        | Accounts Receivable - Electric Sales - City                 | Source Document 19 | 149,781.93        | (10,798.07)       | 138,983.86       |
| 34       | 14620        | Accounts Receivable - Misc Non-Operating Sales - City       | Source Document 19 | 8,216.65          | (8,216.65)        | -                |
| 35       | 14630        | Accounts Receivable - Misc Non-Operating Sales - IMPA       | Source Document 19 | -                 | -                 | -                |
| 36       | 14650        | Interest Receivable - City Of Richmond                      | Source Document 19 | -                 | -                 | -                |
| 37       | 15110        | Fuel Stock - Coal   | Source Document 19 | -                 | -                 | -                |
| 38       | 15120        | Fuel Stock - Oil  | Source Document 19 | -                 | -                 | -                |
| 39       | 15210        | Fuel Stock - Labor  | Source Document 19 | -                 | -                 | -                |
| 40       | 15220        | Fuel Stock - General  | Source Document 19 | -                 | -                 | -                |
| 41       | 15410        | Operating Supplies - Chemicals - WWVS                       | Source Document 19 | -                 | -                 | -                |
| 42       | 15420        | Operating Supplies - Miscellaneous                          | Source Document 19 | 2,530,132.28      | (323,923.14)      | 2,206,209.14     |
| 43       | 15810        | Allowance Inventory   | Source Document 19 | -                 | -                 | -                |
| 44       | 16320        | Stores Expense - Inventory Adjustments                      | Source Document 19 | (6,575.14)        | (987.55)          | (7,562.69)       |
| 45       | 16610        | Prepaid Insurance   | Source Document 19 | 301,794.98        | 13,400.59         | 315,195.57       |
| 46       | 16620        | Prepaid Expenses - Miscellaneous                            | Source Document 19 | 2,780.00          | (1,585.00)        | 1,195.00         |
| 47       | 16630        | Prepaid Postage   | Source Document 19 | 27,320.29         | (24,348.93)       | 2,971.36         |
| 48       | 17120        | Interest Receivable - Cash Reserve Fund                     | Source Document 19 | -                 | -                 | -                |
| 49       | 17140        | Interest Receivable - Bond Reserve Fund                     | Source Document 19 | -                 | -                 | -                |
| 50       | 17150        | Interest Receivable - Depreciation Reserve Fund             | Source Document 19 | -                 | -                 | -                |
| 51       | 17160        | Interest Receivable - Consumer Deposit Fund                 | Source Document 19 | -                 | -                 | -                |
| 52       | 17180        | Interest Receivable - Insurance Reserve Fund                | Source Document 19 | -                 | -                 | -                |
| 53       | 18340        | Preliminary Survey and Investigation - GE Relaying Study    | Source Document 19 | -                 | -                 | -                |
| 54       | 18360        | Preliminary Survey and Investigation Charges - SO NOX       | Source Document 19 | -                 | -                 | -                |
| 55       | 18411        | Clearing - Supervision - Line Department                    | Source Document 19 | -                 | -                 | -                |
| 56       | 18420        | Clearing - Line - Service Dispatcher                        | Source Document 19 | -                 | -                 | -                |
| 57       | 18421        | Clearing - Labor - Line Department                          | Source Document 19 | -                 | -                 | -                |
| 58       | 18422        | Clearing - Labor - Meter Department                         | Source Document 19 | -                 | -                 | -                |
| 59       | 18427        | Clearing - Labor - Janitorial                               | Source Document 19 | -                 | -                 | -                |
| 60       | 18440        | Clearing - Transportation                                   | Source Document 19 | -                 | -                 | -                |
| 61       | 18450        | Clearing - Cash   | Source Document 19 | (310.00)          | 310.00            | -                |
| 62       | 18455        | Clearing - Economic Development Rider Credit - Customers    | Source Document 19 | -                 | (26,840.62)       | (26,840.62)      |
| 63       | 18460        | Clearing - Sales Tax  | Source Document 19 | (0.70)            | 0.74              | 0.04             |
| 64       | 18470        | Clearing - Printing and Duplication                         | Source Document 19 | -                 | -                 | -                |
| 65       | 18490        | Clearing - Telephone  | Source Document 19 | -                 | -                 | -                |
| 66       | 18620        | Deferred Debit - Non-Operating - City                       | Source Document 19 | -                 | 889.36            | 889.36           |
| 67       | 18630        | Deferred Debit - Non-Operating - Consumer                   | Source Document 19 | 319,811.30        | (253,183.29)      | 66,628.01        |
| 68       | 18640        | Deferred Debit - IMPA                                       | Source Document 19 | 2,915.56          | 2,731.08          | 5,646.64         |
| 69       | 18690        | Deferred Pension Outflows                                   | Source Document 19 | 2,844,905.28      | (1,475,036.54)    | 1,369,868.74     |
| 70       | 21600        | Unappropriated Retained Earnings                            | Source Document 19 | (55,120,423.84)   | -                 | (55,120,423.84)  |
| 71       | 22130        | Long Term Debt - 2006 Bonds                                 | Source Document 19 | -                 | -                 | -                |
| 72       | 22140        | Long Term Debt - 2008 Bonds                                 | Source Document 19 | -                 | -                 | -                |
| 73       | 23210        | Accounts Payable - General                                  | Source Document 19 | (104,331.59)      | (253,336.64)      | (357,668.23)     |
| 74       | 23211        | Accounts Payable Conversion                                 | Source Document 19 | -                 | -                 | -                |
| 75       | 23410        | Accounts Payable - IMPA                                     | Source Document 19 | (11,294,705.99)   | 442,670.08        | (10,852,035.91)  |
| 76       | 23510        | Customer Deposits - Current                                 | Source Document 19 | (666,598.48)      | (27,545.08)       | (694,143.56)     |
| 77       | 23520        | Customer Deposits - Unclaimed                               | Source Document 19 | (38,433.22)       | (2,411.39)        | (40,844.61)      |
| 78       | 23610        | Taxes Accrued - Utility Receipts Tax                        | Source Document 19 | 31,875.66         | (14,477.39)       | 17,398.27        |
| 79       | 23620        | Taxes Accrued - FICA  | Source Document 19 | -                 | -                 | -                |
| 80       | 23720        | Interest Accrued - Bonds                                    | Source Document 19 | -                 | -                 | -                |
| 81       | 23800        | Liability To City In Lieu Of Taxes                          | Source Document 19 | (2,674,635.75)    | -                 | (2,674,635.75)   |
| 82       | 24120        | Tax Collection Payable - FICA Taxes                         | Source Document 19 | -                 | -                 | -                |
| 83       | 24140        | Tax Collection Payable - County Adjusted Gross Income Tax   | Source Document 19 | -                 | -                 | -                |
| 84       | 24145        | Tax Collection Payable - School District Withholding        | Source Document 19 | -                 | -                 | -                |
| 85       | 24150        | Tax Collection Payable - State Withholding Income Tax       | Source Document 19 | -                 | -                 | -                |
| 86       | 24160        | Tax Collection Payable - Federal Withholding Income Tax     | Source Document 19 | -                 | -                 | -                |
| 87       | 24170        | Tax Collection Payable - Sales Tax - Electric Sales         | Source Document 19 | (227,769.32)      | 8,347.80          | (219,421.52)     |
| 88       | 24171        | Tax Collection Payable - Cafeteria Sales                    | Source Document 19 | -                 | -                 | -                |
| 89       | 24172        | Tax Collection Payable - Miscellaneous Sales                | Source Document 19 | (6.02)            | 4.06              | (1.96)           |
| 90       | 24200        | Deferred Pension Inflows                                    | Source Document 19 | (515,785.00)      | (408,290.00)      | (924,075.00)     |
| 91       | 24205        | Net Pension Liability                                       | Source Document 19 | (21,161,826.00)   | 288,176.00        | (20,873,650.00)  |
| 92       | 24208        | Environmental Remediation Liability                         | Source Document 19 | (11,816,183.38)   | (554,662.71)      | (12,370,846.09)  |
| 93       | 24220        | Current Liability - Group Insurances                        | Source Document 19 | -                 | -                 | -                |
| 94       | 24222        | Accrued Liability - Self Insurance                          | Source Document 19 | -                 | -                 | -                |
| 95       | 24223        | Health Care Reimbursement                                   | Source Document 19 | -                 | 2,258.45          | 2,258.45         |
| 96       | 24224        | Dependent Care Reimbursement                                | Source Document 19 | -                 | -                 | -                |
| 97       | 24226        | Insurance Bridge Liability                                  | Source Document 19 | (8,590.02)        | 10,706.00         | 2,115.98         |
| 98       | 24230        | Current Liability - Retirement Plan                         | Source Document 19 | -                 | 9,532.05          | 9,532.05         |
| 99       | 24250        | Current Liability - Saving Bonds                            | Source Document 19 | -                 | -                 | -                |
| 100      | 24255        | Current Liability - AFLAC                                   | Source Document 19 | 13.64             | (13.64)           | -                |
| 101      | 24260        | Current Liability - Federated Donations                     | Source Document 19 | -                 | -                 | -                |
| 102      | 24265        | Current Liability - One America Life Insurance              | Source Document 19 | -                 | -                 | -                |
| 103      | 24270        | Current Liability - Union Dues                              | Source Document 19 | -                 | 1,730.60          | 1,730.60         |
| 104      | 24280        | Current Liability - Credit Union Withholdings               | Source Document 19 | -                 | 19,382.70         | 19,382.70        |
| 105      | 24290        | Current Liability - Garnishee                               | Source Document 19 | -                 | -                 | -                |
| 106      | 24295        | Liability for Earned Vacation                               | Source Document 19 | (503,685.38)      | (34,627.66)       | (538,313.04)     |
| 107      | 25200        | Deferred Credit - Customer Advance for Construction         | Source Document 19 | -                 | -                 | -                |
| 108      | 25320        | Deferred Credit - Overpayments - Customers                  | Source Document 19 | -                 | -                 | -                |
| 109      | 26320        | Flexible Benefit Reserve                                    | Source Document 19 | -                 | -                 | -                |
| 110      | 26350        | Current Liability - Employees Deferred Wages                | Source Document 19 | -                 | 4,190.44          | 4,190.44         |

Test Year Trial Balance LAT WP-22

| A        | B            | C  | D                  | E                 | F                 | G               |
|----------|--------------|--|--------------------|-------------------|-------------------|-----------------|
| Line No. | Account Code | Account Title  | Source             | Beginning Balance | Net Period Change | Ending Balance  |
| 111      | 27110        | Contribution In Aid Of Construction - Individuals            | Source Document 19 | (926,746.25)      | (23,092.89)       | (949,839.14)    |
| 112      | 27120        | Contribution In Aid Of Construction - Government Agency      | Source Document 19 | (1,020,871.10)    | -                 | (1,020,871.10)  |
| 113      | 31000        | Land and Land Rights - Whitewater Valley Station             | Source Document 19 | 80,644.08         | -                 | 80,644.08       |
| 114      | 31100        | Structures and Improvements - Whitewater Valley Station      | Source Document 19 | 2,848,645.48      | -                 | 2,848,645.48    |
| 115      | 31200        | Boilers and Accessories, Coal and Ash Handling Equipment     | Source Document 19 | 24,874,229.02     | -                 | 24,874,229.02   |
| 116      | 31400        | Main Turbine - Driven Units and Accessory Equipment          | Source Document 19 | 12,493,389.51     | -                 | 12,493,389.51   |
| 117      | 31440        | Cooling Towers   | Source Document 19 | 119,062.55        | -                 | 119,062.55      |
| 118      | 31500        | Accessory Electric Equipment - Whitewater Valley Station     | Source Document 19 | 2,282,709.79      | -                 | 2,282,709.79    |
| 119      | 31600        | Misc Power Plant Equipment - Whitewater Valley Station       | Source Document 19 | 9,516,266.25      | -                 | 9,516,266.25    |
| 120      | 34600        | Misc Power Plant Equipment - WWVS - Landfill                 | Source Document 19 | 880,799.58        | -                 | 880,799.58      |
| 121      | 35000        | Land and Land Rights - Transmission Plant                    | Source Document 19 | 568,604.44        | 36.25             | 568,640.69      |
| 122      | 35200        | Structures and Improvements - Transmission Plant             | Source Document 19 | 560,359.40        | -                 | 560,359.40      |
| 123      | 35300        | Station Equipment - General                                  | Source Document 19 | 2,210,833.46      | 273,661.61        | 2,484,495.07    |
| 124      | 35305        | Station Equipment - IMPA Peaker                              | Source Document 19 | -                 | -                 | -               |
| 125      | 35310        | Station Equipment - Whitewater Sub                           | Source Document 19 | 2,958,505.65      | -                 | 2,958,505.65    |
| 126      | 35320        | Station Equipment - Richmond Sub                             | Source Document 19 | 2,807,177.18      | -                 | 2,807,177.18    |
| 127      | 35325        | Station Equipment - Johns Manville                           | Source Document 19 | 3,545,628.84      | 10,056.82         | 3,555,685.66    |
| 128      | 35330        | Station Equipment - Johnson Street Sub                       | Source Document 19 | 2,299,789.58      | 13,390.00         | 2,313,179.58    |
| 129      | 35340        | Station Equipment - Hodgkin Sub                              | Source Document 19 | 2,635,117.82      | -                 | 2,635,117.82    |
| 130      | 35350        | Station Equipment - Treaty Line Sub                          | Source Document 19 | 34,448.59         | -                 | 34,448.59       |
| 131      | 35360        | Station Equipment - NW 11th Street Sub                       | Source Document 19 | 1,328,627.03      | 1,750.00          | 1,330,377.03    |
| 132      | 35370        | Station Equipment - East Sub                                 | Source Document 19 | 689,261.21        | 468.79            | 689,730.00      |
| 133      | 35380        | Station Equipment - Shawnee Sub                              | Source Document 19 | 51,713.60         | 53,571.85         | 105,285.45      |
| 134      | 35385        | Station Equipment - Gaar Jackson Substation                  | Source Document 19 | -                 | -                 | -               |
| 135      | 35390        | Station Equipment - Williamsburg Sub                         | Source Document 19 | 248,422.72        | -                 | 248,422.72      |
| 136      | 35395        | Station Equipment - Highland Sub                             | Source Document 19 | 2,381,777.82      | -                 | 2,381,777.82    |
| 137      | 35400        | Towers and Appurtenant Fixtures - Transmission Plant         | Source Document 19 | 320,801.28        | -                 | 320,801.28      |
| 138      | 35500        | Line Poles and Appurtenant Fixtures - Transmission Plant     | Source Document 19 | 3,626,556.98      | -                 | 3,626,556.98    |
| 139      | 35600        | Overhead Conductors and Devices - Transmission Plant         | Source Document 19 | 2,028,655.76      | -                 | 2,028,655.76    |
| 140      | 35700        | Underground Conduit and Tunnels - Transmission Plant         | Source Document 19 | 71,268.99         | 2.08              | 71,271.07       |
| 141      | 35800        | Underground Conductors and Devices - Transmission Plant      | Source Document 19 | 228,677.80        | -                 | 228,677.80      |
| 142      | 35900        | Roads, Trails and Bridges - Transmission Plant               | Source Document 19 | 782.68            | -                 | 782.68          |
| 143      | 36000        | Land and Land Rights - Distribution Plant                    | Source Document 19 | 239,523.66        | 639.00            | 240,162.66      |
| 144      | 36100        | Structures and Improvements - Distribution Plant             | Source Document 19 | 915,720.40        | 5,500.00          | 921,220.40      |
| 145      | 36200        | Station Equipment - Distribution Plant                       | Source Document 19 | 8,796,393.56      | -                 | 8,796,393.56    |
| 146      | 36300        | Storage Battery Equipment - Distribution Plant               | Source Document 19 | 72,170.20         | -                 | 72,170.20       |
| 147      | 36400        | Poles, Towers and Appurtenant Fixtures - Distribution Plant  | Source Document 19 | 12,898,964.02     | 438,878.98        | 13,337,843.00   |
| 148      | 36500        | Overhead Conductors and Devices - Distribution Plant         | Source Document 19 | 11,724,291.83     | 233,693.65        | 11,957,985.48   |
| 149      | 36600        | Underground Conduit and Tunnels - Distribution Plant         | Source Document 19 | 8,337,627.86      | 309,546.17        | 8,647,174.03    |
| 150      | 36700        | Underground Conductors and Devices - Distribution Plant      | Source Document 19 | 9,584,628.07      | 691,130.10        | 10,275,758.17   |
| 151      | 36810        | Overhead Line Transformers - Distribution Plant              | Source Document 19 | 4,259,102.64      | (28,613.37)       | 4,230,489.27    |
| 152      | 36820        | Underground Line Transformers - Distribution Plant           | Source Document 19 | 6,734,880.79      | 10,858.70         | 6,745,739.49    |
| 153      | 36910        | Overhead Services - Distribution Plant                       | Source Document 19 | 4,939,331.77      | 22,127.04         | 4,961,458.81    |
| 154      | 36920        | Underground Services - Distribution Plant                    | Source Document 19 | 2,788,734.44      | 20,350.30         | 2,809,084.74    |
| 155      | 37000        | Meters, Devices and Installation                             | Source Document 19 | 6,009,741.07      | 115,292.07        | 6,125,033.14    |
| 156      | 37100        | Unmetered Outdoor Lighting Equip - Install on Customer Site  | Source Document 19 | 986,163.09        | 77,611.21         | 1,063,774.30    |
| 157      | 37310        | Public Street and Highway Lighting - Pendants                | Source Document 19 | 2,525,636.60      | 2,204.17          | 2,527,840.77    |
| 158      | 37320        | Public Street and Highway Lighting - Ornaments               | Source Document 19 | 1,487,934.94      | 26,622.79         | 1,514,557.73    |
| 159      | 38900        | Land and Land Rights - 8th Street Office                     | Source Document 19 | 49,037.75         | -                 | 49,037.75       |
| 160      | 39000        | Structures & Improvements - General Plant                    | Source Document 19 | 645,528.82        | 59,910.51         | 705,439.33      |
| 161      | 39010        | Structures and Improvements - 8th Street                     | Source Document 19 | 330,531.95        | 1,645.27          | 332,177.22      |
| 162      | 39020        | Structures and Improvements - Stores                         | Source Document 19 | 99,699.53         | -                 | 99,699.53       |
| 163      | 39030        | Structures and Improvements - General Offices                | Source Document 19 | 3,633,405.05      | -                 | 3,633,405.05    |
| 164      | 39040        | Improvements to Land   | Source Document 19 | 460,499.85        | -                 | 460,499.85      |
| 165      | 39100        | Office Equipment and Furniture - General                     | Source Document 19 | 7,962,030.31      | 19,565.14         | 7,981,595.45    |
| 166      | 39211        | Production - Trucks  | Source Document 19 | -                 | -                 | -               |
| 167      | 39220        | Line - Automobiles   | Source Document 19 | 108,631.77        | -                 | 108,631.77      |
| 168      | 39221        | Line - Trucks  | Source Document 19 | 2,088,146.16      | 246,738.21        | 2,335,884.37    |
| 169      | 39230        | Meter - Automobiles  | Source Document 19 | 34,093.04         | 21,507.40         | 55,600.44       |
| 170      | 39231        | Meter - Trucks   | Source Document 19 | 273,228.03        | 96,377.17         | 369,605.20      |
| 171      | 39240        | Engineering - Automobiles                                    | Source Document 19 | 334.30            | -                 | 334.30          |
| 172      | 39241        | Engineering - Trucks   | Source Document 19 | 132,243.94        | 22,439.68         | 154,683.62      |
| 173      | 39250        | Personnel - Automobiles                                      | Source Document 19 | 45,010.61         | -                 | 45,010.61       |
| 174      | 39251        | Personnel - Trucks   | Source Document 19 | 8,029.07          | -                 | 8,029.07        |
| 175      | 39260        | Customer Service - Automobiles                               | Source Document 19 | 31,690.68         | 45,882.88         | 77,573.56       |
| 176      | 39261        | Customer Service - Trucks                                    | Source Document 19 | 26,725.00         | -                 | 26,725.00       |
| 177      | 39270        | General Manager - Automobiles                                | Source Document 19 | 125,348.46        | -                 | 125,348.46      |
| 178      | 39280        | Trailers and Miscellaneous Vehicles                          | Source Document 19 | 488,850.41        | (30,648.50)       | 458,201.91      |
| 179      | 39300        | Stores Equipment   | Source Document 19 | 54,876.66         | -                 | 54,876.66       |
| 180      | 39400        | Tools, Implements and Garage Equipment                       | Source Document 19 | 1,373,408.26      | 15,650.12         | 1,389,058.38    |
| 181      | 39500        | General Laboratory Equipment                                 | Source Document 19 | 798,761.38        | (2,450.00)        | 796,311.38      |
| 182      | 39510        | Power Quality Equipment                                      | Source Document 19 | 42,507.37         | 16,353.94         | 58,861.31       |
| 183      | 39600        | Power Operated Equipment and Accessories                     | Source Document 19 | 1,598,583.47      | -                 | 1,598,583.47    |
| 184      | 39700        | Telephones, Radios and Miscellaneous Communication Equipment | Source Document 19 | 4,428,978.19      | 9,282.34          | 4,438,260.53    |
| 185      | 39710        | Communication Equipment - Fiber                              | Source Document 19 | 115,925.82        | 35,985.60         | 151,911.42      |
| 186      | 39800        | Miscellaneous Utility Equipment, Apparatus, Etc.             | Source Document 19 | 338,449.69        | 14,761.18         | 353,210.87      |
| 187      | 39900        | Other Tangible Utility Property                              | Source Document 19 | 85,873.42         | -                 | 85,873.42       |
| 188      | 40300        | Depreciation Expenses  | Source Document 19 | 3,740,221.54      | 4,584,844.92      | 8,325,066.46    |
| 189      | 40811        | Tax Expense - Utility Receipts Tax                           | Source Document 19 | 588,037.45        | 1,108,142.41      | 1,696,179.86    |
| 190      | 40812        | Tax Exp-Fica   | Source Document 19 | 343,784.15        | 448,689.52        | 792,473.67      |
| 191      | 40813        | Tax Exp-Suta   | Source Document 19 | -                 | -                 | -               |
| 192      | 40814        | Tax Exp-Pmt To City In Lieu                                  | Source Document 19 | 583,344.00        | 777,792.00        | 1,361,136.00    |
| 193      | 40815        | Property Taxes   | Source Document 19 | -                 | -                 | -               |
| 194      | 41400        | Gains (Losses) From Dispose                                  | Source Document 19 | -                 | -                 | -               |
| 195      | 41510        | Contract Income-Billing                                      | Source Document 19 | (6,153.25)        | (7,942.10)        | (14,095.35)     |
| 196      | 41900        | Interest Income- Checking Acct                               | Source Document 19 | (5,707.02)        | (7,038.86)        | (12,745.88)     |
| 197      | 41915        | Int & Dividend Income  | Source Document 19 | -                 | -                 | -               |
| 198      | 41920        | Int Income-Cash Reserve                                      | Source Document 19 | -                 | -                 | -               |
| 199      | 41940        | Int Income-Bond Reserve                                      | Source Document 19 | (2,509.01)        | (445.15)          | (2,954.16)      |
| 200      | 41950        | Int Income-Depreciation                                      | Source Document 19 | (33,453.58)       | (80,897.10)       | (114,350.68)    |
| 201      | 41960        | Int Income-Cons Deposit                                      | Source Document 19 | -                 | -                 | -               |
| 202      | 41980        | Int Income-Insurance Res                                     | Source Document 19 | (4,456.02)        | (10,078.89)       | (14,534.91)     |
| 203      | 41990        | Int Income-City Of Richmond                                  | Source Document 19 | -                 | -                 | -               |
| 204      | 41995        | Int Income-Parallax  | Source Document 19 | (38,182.87)       | (50,310.89)       | (88,493.76)     |
| 205      | 42655        | Environmental Remediation                                    | Source Document 19 | -                 | 631,877.00        | 631,877.00      |
| 206      | 42720        | Int On Lt Debt - Bonds                                       | Source Document 19 | 2,942.32          | -                 | 2,942.32        |
| 207      | 43120        | Int Expense-Cons Deposit                                     | Source Document 19 | 4,841.75          | 6,868.10          | 11,709.85       |
| 208      | 43600        | Appr Of Retained Earnings                                    | Source Document 19 | 1,021,437.45      | 1,361,916.60      | 2,383,354.05    |
| 209      | 44010        | Elec Sales-Res Service                                       | Source Document 19 | (15,086,636.63)   | (19,192,368.06)   | (34,279,004.69) |
| 210      | 44210        | Elec Sales-Commercial Light                                  | Source Document 19 | (3,960,909.93)    | (5,011,363.93)    | (8,972,273.86)  |
| 211      | 44220        | Elec Sales-General Power                                     | Source Document 19 | (10,005,885.32)   | (12,891,984.80)   | (22,897,870.12) |
| 212      | 44230        | Elec Sales-Mun Light-Public                                  | Source Document 19 | (63,265.65)       | (75,014.97)       | (138,280.62)    |
| 213      | 44240        | Elec Sales-Municipal Power                                   | Source Document 19 | (734,288.97)      | (922,021.57)      | (1,656,310.54)  |
| 214      | 44260        | Elec Sales-Oil Lights  | Source Document 19 | (190,604.78)      | (260,570.02)      | (451,174.80)    |
| 215      | 44270        | Elec Sales-Industrial Serv                                   | Source Document 19 | (5,124,820.35)    | (6,984,975.69)    | (12,109,796.04) |
| 216      | 44280        | Elec Sales-Large Power                                       | Source Document 19 | (26,292,397.07)   | (34,060,136.85)   | (60,352,533.92) |
| 217      | 44290        | Elec Sales-General Elec                                      | Source Document 19 | (147,424.03)      | (185,100.44)      | (332,524.47)    |
| 218      | 44410        | Elec Sales-Public St. Lght                                   | Source Document 19 | (111,152.35)      | (149,880.68)      | (261,033.03)    |
| 219      | 44420        | Elec Sales-Public St&Hwy                                     | Source Document 19 | (579,878.89)      | (777,637.68)      | (1,357,516.57)  |
| 220      | 44430        | Elec Sales-Traffic Lights                                    | Source Document 19 | (17,634.02)       | (23,860.61)       | (41,494.63)     |

Test Year Trial Balance LAT WP-22

| A        | B            | C                                      | D                  | E                 | F                 | G              |
|----------|--------------|--|--------------------|-------------------|-------------------|----------------|
| Line No. | Account Code | Account Title                          | Source             | Beginning Balance | Net Period Change | Ending Balance |
| 221      | 44500        | Elec Sales-School Sp Heat              | Source Document 19 | (39,927.84)       | (44,668.55)       | (84,596.39)    |
| 222      | 44700        | Sales For Resale- Impa                 | Source Document 19 | -                 | -                 | -              |
| 223      | 44710        | Reserve Capacity Revenue               | Source Document 19 | -                 | -                 | -              |
| 224      | 45000        | Penalties For Late Pmts                | Source Document 19 | (458,305.34)      | (558,091.41)      | (1,016,396.75) |
| 225      | 45110        | Misc Rev - City Of Richmond            | Source Document 19 | (538.77)          | (927.23)          | (1,466.00)     |
| 226      | 45120        | Misc Revenues - General                | Source Document 19 | (75,524.75)       | (256,196.84)      | (331,721.59)   |
| 227      | 45121        | Connect Or Recon Charges               | Source Document 19 | (41,995.00)       | (50,855.00)       | (92,850.00)    |
| 228      | 45122        | Temporary Service Charges              | Source Document 19 | (300.00)          | (570.00)          | (870.00)       |
| 229      | 45123        | Dishonored Check Charges               | Source Document 19 | (3,900.00)        | (6,120.00)        | (10,020.00)    |
| 230      | 45130        | Misc Service Revenue - IMPA            | Source Document 19 | (1,197.13)        | (19,091.23)       | (20,288.36)    |
| 231      | 45410        | Rent From Elec Prop - Land             | Source Document 19 | -                 | -                 | -              |
| 232      | 45420        | Rent From Joint Use Of Pole            | Source Document 19 | (139,480.21)      | (139,159.39)      | (278,639.60)   |
| 233      | 45610        | Taxable Sale Of M & S                  | Source Document 19 | -                 | -                 | -              |
| 234      | 45630        | Revenue - Emission Credits             | Source Document 19 | -                 | -                 | -              |
| 235      | 45640        | Misc Revenues                          | Source Document 19 | (346.28)          | (263.09)          | (609.37)       |
| 236      | 50000        | Supv Of Operations                     | Source Document 19 | -                 | -                 | -              |
| 237      | 50110        | Fuel Expense-Coal                      | Source Document 19 | -                 | -                 | -              |
| 238      | 50120        | Fuel Expense-Oil                       | Source Document 19 | -                 | -                 | -              |
| 239      | 50130        | Fuel Expense-Fuel Handling             | Source Document 19 | -                 | -                 | -              |
| 240      | 50140        | Fuel Expense-Ash Disposal              | Source Document 19 | -                 | -                 | -              |
| 241      | 50150        | Fuel Expense-Analyses                  | Source Document 19 | -                 | -                 | -              |
| 242      | 50160        | Fuel Expense-General                   | Source Document 19 | -                 | -                 | -              |
| 243      | 50210        | Boiler Exp-Operation                   | Source Document 19 | -                 | -                 | -              |
| 244      | 50220        | Water Treatment For Steam              | Source Document 19 | -                 | -                 | -              |
| 245      | 50510        | Turbine & Elec Exp-Oper                | Source Document 19 | -                 | -                 | -              |
| 246      | 50520        | Water Treatment-Condense               | Source Document 19 | -                 | -                 | -              |
| 247      | 50610        | Misc Steam Power Exp-Cler              | Source Document 19 | -                 | -                 | -              |
| 248      | 50620        | Care Of Grounds                        | Source Document 19 | -                 | -                 | -              |
| 249      | 50630        | Misc Steam Power Exp-Gen               | Source Document 19 | -                 | -                 | -              |
| 250      | 50900        | SO2 Allowances                         | Source Document 19 | -                 | -                 | -              |
| 251      | 50910        | NOX Allowances                         | Source Document 19 | -                 | -                 | -              |
| 252      | 51000        | Supv Of Maint                          | Source Document 19 | -                 | -                 | -              |
| 253      | 51100        | Maint Of Structures                    | Source Document 19 | -                 | -                 | -              |
| 254      | 51210        | Maint-Ash Handling Equip               | Source Document 19 | -                 | -                 | -              |
| 255      | 51211        | Maint Of Coal Conveyors                | Source Document 19 | -                 | -                 | -              |
| 256      | 51212        | Maint Of Coal Crushers                 | Source Document 19 | -                 | -                 | -              |
| 257      | 51213        | Maint Of Coal Pulverizers              | Source Document 19 | -                 | -                 | -              |
| 258      | 51214        | Coal Handling Equipment                | Source Document 19 | -                 | -                 | -              |
| 259      | 51215        | Maint Of Coal Feed & Scales            | Source Document 19 | -                 | -                 | -              |
| 260      | 51220        | Maint Of I.D. & F.D. Fans              | Source Document 19 | -                 | -                 | -              |
| 261      | 51221        | Maint Of Soot Blowers                  | Source Document 19 | -                 | -                 | -              |
| 262      | 51222        | Maint Of Air Preheaters                | Source Document 19 | -                 | -                 | -              |
| 263      | 51223        | Boiler Auxiliary System                | Source Document 19 | -                 | -                 | -              |
| 264      | 51224        | Boilers                                | Source Document 19 | -                 | -                 | -              |
| 265      | 51225        | Maint Of Furnace & Boilers-Bre         | Source Document 19 | -                 | -                 | -              |
| 266      | 51230        | Maint Of Water Treat Eq                | Source Document 19 | -                 | -                 | -              |
| 267      | 51231        | Maint Of Instruments & Dev             | Source Document 19 | -                 | -                 | -              |
| 268      | 51233        | Maint Of Other Boiler Appar            | Source Document 19 | -                 | -                 | -              |
| 269      | 51234        | Boiler Condensate and Feedwater System | Source Document 19 | -                 | -                 | -              |
| 270      | 51235        | Maint Of Feedwater Heaters             | Source Document 19 | -                 | -                 | -              |
| 271      | 51240        | Maint Of Steam Piping-Acces            | Source Document 19 | -                 | -                 | -              |
| 272      | 51241        | Maint Of Insulation                    | Source Document 19 | -                 | -                 | -              |
| 273      | 51250        | Maint Of Electrostatic Prec            | Source Document 19 | -                 | -                 | -              |
| 274      | 51251        | Maint Of Stacks                        | Source Document 19 | -                 | -                 | -              |
| 275      | 51252        | Pollution Control Equipment            | Source Document 19 | -                 | -                 | -              |
| 276      | 51253        | Maint-Envi & Monitoring Eq             | Source Document 19 | -                 | -                 | -              |
| 277      | 51310        | Maint Of Turbo-Generators              | Source Document 19 | -                 | -                 | -              |
| 278      | 51320        | Maint Of Con And Pumps                 | Source Document 19 | -                 | -                 | -              |
| 279      | 51330        | Cooling Tower                          | Source Document 19 | -                 | -                 | -              |
| 280      | 51331        | Maint Of Cooling Tower-Fan             | Source Document 19 | -                 | -                 | -              |
| 281      | 51332        | Maint Of Cooling Tower-Mot             | Source Document 19 | -                 | -                 | -              |
| 282      | 51333        | Maint Of Cooling Tower-Gb              | Source Document 19 | -                 | -                 | -              |
| 283      | 51340        | Maint Of Access Electric Eq            | Source Document 19 | -                 | -                 | -              |
| 284      | 51350        | Maint Of Other Electric Eq             | Source Document 19 | -                 | -                 | -              |
| 285      | 51360        | Maint Of Circulating Water P           | Source Document 19 | -                 | -                 | -              |
| 286      | 51365        | Maint Of River Pumps                   | Source Document 19 | -                 | -                 | -              |
| 287      | 51370        | Maint Of Switchgear                    | Source Document 19 | -                 | -                 | -              |
| 288      | 51410        | Maint Of Compressors                   | Source Document 19 | -                 | -                 | -              |
| 289      | 51420        | Maint Of Weather-Atmos Eq              | Source Document 19 | -                 | -                 | -              |
| 290      | 51430        | Equipment and Tools                    | Source Document 19 | -                 | -                 | -              |
| 291      | 55410        | Maint of Misc Other Power Gen          | Source Document 19 | -                 | -                 | -              |
| 292      | 55500        | Purchased Power-Impa                   | Source Document 19 | 48,254,103.81     | 63,003,797.14     | 111,257,900.95 |
| 293      | 55510        | Peak Management Credit                 | Source Document 19 | -                 | -                 | -              |
| 294      | 55700        | Other Purch Power Exp                  | Source Document 19 | -                 | -                 | -              |
| 295      | 56200        | Station Expense-Trans                  | Source Document 19 | -                 | -                 | -              |
| 296      | 56300        | Oh Line Expense-Trans                  | Source Document 19 | -                 | -                 | -              |
| 297      | 56400        | Patrol & Testing - UG Lines            | Source Document 19 | -                 | -                 | -              |
| 298      | 56800        | Supervision Of Maint-Trans             | Source Document 19 | -                 | -                 | -              |
| 299      | 56900        | Maint Of Buildings                     | Source Document 19 | -                 | -                 | -              |
| 300      | 57000        | Maint Of Station Equip-Gen             | Source Document 19 | -                 | -                 | -              |
| 301      | 57010        | Maint Of Transf & Regulat              | Source Document 19 | -                 | -                 | -              |
| 302      | 57100        | Maint Of Oh Lines-General              | Source Document 19 | -                 | -                 | -              |
| 303      | 57200        | Maint Of Ug Lines-General              | Source Document 19 | -                 | -                 | -              |
| 304      | 58000        | Supervision Of Oper-Dist               | Source Document 19 | 541,522.06        | 739,501.26        | 1,281,023.32   |
| 305      | 58100        | Load Dispatching-Dist                  | Source Document 19 | 75,883.84         | 138,456.99        | 214,340.83     |
| 306      | 58200        | Station Exp-Dist                       | Source Document 19 | 33,052.68         | 61,612.57         | 94,665.25      |
| 307      | 58300        | Oh Line Expense-General                | Source Document 19 | 61,867.12         | 86,484.90         | 148,352.02     |
| 308      | 58320        | Oh Line Expense-Patrol-Test            | Source Document 19 | 1,963.48          | 2,340.92          | 4,304.40       |
| 309      | 58330        | Oh Line-Remove/Reset Trans             | Source Document 19 | -                 | -                 | -              |
| 310      | 58400        | Ug Line Expense-General                | Source Document 19 | 44,414.17         | 67,031.01         | 111,445.18     |
| 311      | 58500        | St. Lighting-Pend-Gen                  | Source Document 19 | -                 | -                 | -              |
| 312      | 58510        | St. Lighting-Pend-Lamp Repl            | Source Document 19 | -                 | -                 | -              |
| 313      | 58530        | St. Lighting-Orm-Lamp Repl             | Source Document 19 | -                 | -                 | -              |
| 314      | 58600        | Meter Expense-General                  | Source Document 19 | 133,776.97        | 172,353.78        | 306,130.75     |
| 315      | 58610        | Set & Remove Sp Meters                 | Source Document 19 | 49,513.77         | 56,503.44         | 106,017.21     |
| 316      | 58611        | Set & Remove-Pp Meters                 | Source Document 19 | -                 | -                 | -              |
| 317      | 58612        | Set & Remove-Solid St Rec              | Source Document 19 | -                 | -                 | -              |
| 318      | 58620        | Meter Systems Analyses                 | Source Document 19 | -                 | -                 | -              |
| 319      | 58630        | Meter Records                          | Source Document 19 | 76,088.28         | 73,409.89         | 149,498.17     |
| 320      | 58700        | Customer Install-General               | Source Document 19 | 100,302.13        | 136,122.00        | 236,424.13     |
| 321      | 58710        | Field Inv Of Meter Malfunc             | Source Document 19 | -                 | -                 | -              |
| 322      | 58720        | Current Diversion                      | Source Document 19 | 16,095.10         | 34,726.05         | 50,821.15      |
| 323      | 58730        | Customer Install-Complaint             | Source Document 19 | -                 | -                 | -              |
| 324      | 58731        | Load Checks-Customers                  | Source Document 19 | -                 | -                 | -              |
| 325      | 58732        | Load Checks-Rp&L                       | Source Document 19 | -                 | -                 | -              |
| 326      | 58733        | Load Research-Sp                       | Source Document 19 | -                 | -                 | -              |
| 327      | 58734        | Load Research-Pp                       | Source Document 19 | -                 | -                 | -              |
| 328      | 58735        | Power Quality                          | Source Document 19 | -                 | -                 | -              |
| 329      | 58736        | Demand Side Manage Install             | Source Document 19 | -                 | -                 | -              |
| 330      | 58800        | Misc Dist Expense-General              | Source Document 19 | 48,460.06         | 58,762.03         | 107,222.09     |

Test Year Trial Balance LAT WP-22

| A        | B            | C  | D                  | E                 | F                 | G              |
|----------|--------------|--|--------------------|-------------------|-------------------|----------------|
| Line No. | Account Code | Account Title                                | Source             | Beginning Balance | Net Period Change | Ending Balance |
| 331      | 58900        | Rents  | Source Document 19 | -                 | -                 | -              |
| 332      | 59000        | Supervision Of Maint-Dist                    | Source Document 19 | 116,998.79        | 161,503.13        | 278,501.92     |
| 333      | 59100        | Maint Of Structures                          | Source Document 19 | 8,515.67          | 16,347.64         | 24,863.31      |
| 334      | 59110        | Care Of Grounds-Dist                         | Source Document 19 | 54,830.98         | 26,117.24         | 80,948.22      |
| 335      | 59200        | Maint Of Station Equip-Gen                   | Source Document 19 | 459,899.17        | 619,656.47        | 1,079,555.64   |
| 336      | 59210        | Maint Of Transf & Regulator                  | Source Document 19 | -                 | -                 | -              |
| 337      | 59250        | Maint Of Switchboards                        | Source Document 19 | -                 | -                 | -              |
| 338      | 59300        | Maint Of Oh Lines-General                    | Source Document 19 | 423,098.14        | 628,205.58        | 1,051,303.72   |
| 339      | 59310        | Maint Of Oh Lines-Tree Trim                  | Source Document 19 | 341,045.36        | 534,985.60        | 876,030.96     |
| 340      | 59330        | Maint Of Oh Lines-Poles & Fix                | Source Document 19 | -                 | -                 | -              |
| 341      | 59400        | Maint Of Ug Lines-General                    | Source Document 19 | 122,057.10        | 130,085.99        | 252,143.09     |
| 342      | 59410        | Maint Of Ug Lines-Vault & Mh                 | Source Document 19 | -                 | -                 | -              |
| 343      | 59440        | Maint Of Ug Lines-Ug Serv                    | Source Document 19 | -                 | -                 | -              |
| 344      | 59450        | Maint Of Ug Lines-Network                    | Source Document 19 | -                 | -                 | -              |
| 345      | 59500        | Maint Of Line Transf-Oh                      | Source Document 19 | 22,057.08         | 38,041.73         | 60,098.81      |
| 346      | 59520        | Maint Of Line Transf-Ug                      | Source Document 19 | -                 | -                 | -              |
| 347      | 59600        | Maint Of St. Light-Pend-Gen                  | Source Document 19 | 129,082.28        | 172,977.24        | 302,059.52     |
| 348      | 59610        | Maint Of St. Light-Pend-Oh Li                | Source Document 19 | -                 | -                 | -              |
| 349      | 59620        | Maint Of St. Light-Pend-Col                  | Source Document 19 | -                 | -                 | -              |
| 350      | 59640        | Maint Of St. Light-Orn-Gen                   | Source Document 19 | -                 | -                 | -              |
| 351      | 59680        | Maint Of Dusk To Dawn Light                  | Source Document 19 | 30,969.35         | 45,685.56         | 76,654.91      |
| 352      | 59700        | Maint Of Meters-General                      | Source Document 19 | 51,964.53         | 31,203.79         | 83,168.32      |
| 353      | 59710        | Testing-Single Phase-In Shop                 | Source Document 19 | -                 | -                 | -              |
| 354      | 59711        | Testing-Single Phase-Prem                    | Source Document 19 | -                 | -                 | -              |
| 355      | 59720        | Testing-Poly Phase-In Shop                   | Source Document 19 | -                 | -                 | -              |
| 356      | 59721        | Testing-Poly Phase-Premise                   | Source Document 19 | -                 | -                 | -              |
| 357      | 59730        | Testing-Test Equip                           | Source Document 19 | -                 | -                 | -              |
| 358      | 59731        | Testing -Instrument Transf                   | Source Document 19 | -                 | -                 | -              |
| 359      | 59732        | Testing-Aux Metering Equip                   | Source Document 19 | -                 | -                 | -              |
| 360      | 59740        | Repair Watthour Meters                       | Source Document 19 | -                 | -                 | -              |
| 361      | 59741        | Repair Test Equip                            | Source Document 19 | -                 | -                 | -              |
| 362      | 59742        | Repair Aux Metering Equip                    | Source Document 19 | -                 | -                 | -              |
| 363      | 59743        | Relocation Of Meters                         | Source Document 19 | -                 | -                 | -              |
| 364      | 59800        | Maint Of Misc Dist Plant                     | Source Document 19 | 7,236.00          | 8,909.78          | 16,145.78      |
| 365      | 71600        | Net Income                                   | Source Document 19 | -                 | -                 | -              |
| 366      | 90200        | Meter Reading Expense                        | Source Document 19 | 120,472.60        | 157,706.91        | 278,179.51     |
| 367      | 90300        | Cust Records & Collect-Gen                   | Source Document 19 | 365,843.98        | 523,256.58        | 889,100.56     |
| 368      | 90310        | Cash Over And Short                          | Source Document 19 | (372.49)          | 51.88             | (320.61)       |
| 369      | 90400        | Uncollect Accts Expense                      | Source Document 19 | 210,699.59        | 304,707.85        | 515,407.44     |
| 370      | 90600        | Cust Serv & Informational Exp                | Source Document 19 | -                 | -                 | -              |
| 371      | 90800        | Customer Assistance Expenses                 | Source Document 19 | -                 | -                 | -              |
| 372      | 90900        | Supv Of Customer Service                     | Source Document 19 | 93,294.92         | 129,528.71        | 222,823.63     |
| 373      | 91000        | Customer Assist Exp                          | Source Document 19 | 2,689.96          | 25,398.88         | 28,088.84      |
| 374      | 91100        | Inform Advertise Exp                         | Source Document 19 | 11,970.90         | 17,116.83         | 29,087.73      |
| 375      | 91200        | Misc Customer Service Exp                    | Source Document 19 | 153,460.00        | 174,573.29        | 328,033.29     |
| 376      | 91600        | Demonstration Exp                            | Source Document 19 | -                 | 258.37            | 258.37         |
| 377      | 91610        | Demo Exp-Res-Misc                            | Source Document 19 | 2,364.53          | 3,215.18          | 5,579.71       |
| 378      | 92000        | Salaries-Gen Mgr & Staff                     | Source Document 19 | 163,354.35        | 295,401.99        | 458,756.34     |
| 379      | 92005        | Salaries-Energy Services                     | Source Document 19 | -                 | -                 | -              |
| 380      | 92010        | Salaries-Other City Official                 | Source Document 19 | 42,772.80         | 59,387.34         | 102,160.14     |
| 381      | 92015        | Salaries-Telecomm                            | Source Document 19 | (13,189.60)       | (1,260.10)        | (14,449.70)    |
| 382      | 92020        | Salaries-Engr                                | Source Document 19 | 50,601.99         | 72,792.78         | 123,394.77     |
| 383      | 92030        | Salaries-Finance & Account                   | Source Document 19 | 151,758.54        | 211,059.93        | 362,818.47     |
| 384      | 92035        | Salaries-Purch And Stores                    | Source Document 19 | 129,679.91        | 180,044.59        | 309,724.50     |
| 385      | 92040        | Salaries-Personnel                           | Source Document 19 | 147,238.11        | 206,782.64        | 354,020.75     |
| 386      | 92045        | Salaries - Summer / Intern                   | Source Document 19 | 17,759.50         | 21,046.00         | 38,805.50      |
| 387      | 92060        | Salaries-Information Sys                     | Source Document 19 | 260,971.32        | 369,978.00        | 630,949.32     |
| 388      | 92100        | Office Supp-Adm & Gen                        | Source Document 19 | 187,333.29        | 270,594.03        | 457,927.32     |
| 389      | 92110        | Office Supp-Other City Offic                 | Source Document 19 | -                 | -                 | -              |
| 390      | 92130        | Association Membership Dues                  | Source Document 19 | -                 | -                 | -              |
| 391      | 92135        | APPA - Rodeo                                 | Source Document 19 | 4,654.19          | 56,065.84         | 60,720.03      |
| 392      | 92140        | Computer Hardware and Support                | Source Document 19 | 3,178.34          | 9,639.12          | 12,807.46      |
| 393      | 92145        | Network Hardware and Maintenance             | Source Document 19 | 1,104.14          | 16,448.37         | 17,552.51      |
| 394      | 92150        | Computer Software and Support                | Source Document 19 | 9,377.87          | 36,057.91         | 45,435.78      |
| 395      | 92160        | Clothing                                     | Source Document 19 | -                 | -                 | -              |
| 396      | 92170        | Employee Empowerment Committee               | Source Document 19 | 2,720.00          | 2,920.00          | 5,640.00       |
| 397      | 92175        | Safety Council                               | Source Document 19 | -                 | 10,277.87         | 10,277.87      |
| 398      | 92300        | Outside Services Employed                    | Source Document 19 | (297,070.73)      | 231,118.75        | (65,951.98)    |
| 399      | 92400        | Property Insurance                           | Source Document 19 | 90,421.27         | 120,474.76        | 210,896.03     |
| 400      | 92500        | Injuries & Damage-Insurance                  | Source Document 19 | 184,043.56        | 254,234.48        | 438,278.04     |
| 401      | 92520        | Injuries & Damage-Wc                         | Source Document 19 | 57,434.10         | 81,526.38         | 138,960.48     |
| 402      | 92530        | Injuries & Damage-Damage Se                  | Source Document 19 | 3,954.85          | 1,846.70          | 5,801.55       |
| 403      | 92600        | Empl Benefits-General                        | Source Document 19 | 10,670.89         | 26,785.11         | 37,456.00      |
| 404      | 92610        | Empl Benefits-Pension                        | Source Document 19 | 1,653,850.45      | 2,192,883.58      | 3,846,734.03   |
| 405      | 92615        | Employee Benefit - Defined Contribution Plan | Source Document 19 | 44,435.53         | 79,584.55         | 124,020.08     |
| 406      | 92620        | Empl Benefits-Health Ins                     | Source Document 19 | 1,090,972.69      | 1,403,025.98      | 2,493,998.67   |
| 407      | 92621        | Empl Benefits-Life Ins                       | Source Document 19 | 8,087.23          | 11,467.69         | 19,554.92      |
| 408      | 92622        | Empl Benefits-Disability Ins                 | Source Document 19 | 12,934.76         | 14,160.67         | 27,095.43      |
| 409      | 92630        | Empl Benefits-Recreation                     | Source Document 19 | -                 | -                 | -              |
| 410      | 92640        | Empl Benefits-Educate Assist                 | Source Document 19 | 9,780.72          | 1,907.97          | 11,688.69      |
| 411      | 92695        | Vacation Earned                              | Source Document 19 | 23,685.38         | 34,627.66         | 58,313.04      |
| 412      | 92800        | Reg Commission Exp-General                   | Source Document 19 | -                 | -                 | -              |
| 413      | 92820        | State Board Of Accts Exp                     | Source Document 19 | 13,998.60         | 15,228.70         | 29,227.30      |
| 414      | 93020        | Misc General Exp                             | Source Document 19 | 643.43            | 1,077.75          | 1,721.18       |
| 415      | 93021        | Memberships And Dues                         | Source Document 19 | 6,457.00          | 11,011.11         | 17,468.11      |
| 416      | 93100        | Rents  | Source Document 19 | -                 | -                 | -              |
| 417      | 93200        | Maint Of Gen Pl-Structures                   | Source Document 19 | 168,705.67        | 298,491.37        | 467,197.04     |
| 418      | 93210        | Maint Of Gen Pl-Office Furn                  | Source Document 19 | 18,247.74         | 23,348.30         | 41,596.04      |
| 419      | 93220        | Maint Of Gen Pl-Misc                         | Source Document 19 | 57.56             | 2,918.02          | 2,975.58       |
| 420      | 93230        | Maint Of Gen Pl-Communicat                   | Source Document 19 | 3,894.63          | 14,600.62         | 18,495.25      |
| 421      | 93235        | Maint Of Gen Pl-Electrical                   | Source Document 19 | -                 | -                 | -              |
| 422      | 93240        | Maint Of Gen Pl-Com Soft                     | Source Document 19 | 24,529.36         | 88,019.01         | 112,548.37     |
| 423      | 93245        | Maint Of Gen Pl-Com Hard                     | Source Document 19 | -                 | 2,157.30          | 2,157.30       |
| 424      | 93300        | Transportation Expenses                      | Source Document 19 | 54,921.58         | 75,483.74         | 130,405.32     |
| 425      | 99999        | Clearing for Allocations                     | Source Document 19 | -                 | -                 | -              |
| 426      | Report Total |  |                    | (0.00)            | (0.00)            | 0.00           |

Sources and Uses of Cash WP LAT-23

|          | A  | B                 | C                  | D                 | E                 | F                 |
|----------|--|-------------------|--------------------|-------------------|-------------------|-------------------|
| Line No. | Component  | Source            | Adjusted Test Year | Phase 1 Year 2021 | Phase 2 Year 2022 | Phase 3 Year 2023 |
|          | Base Case  |                   |                    |                   |                   |                   |
|          | Determinaton of Net Income   |                   |                    |                   |                   |                   |
| 1        | Operating Revenues   |                   |                    |                   |                   |                   |
| 2        | Revenues from Proposed Rates   | WP 1, Table JAM-7 | \$88,453,204       | \$83,087,569      | \$85,801,175      | \$88,459,774      |
| 3        | Other Operating Revenues   | WP 1              | 1,031,274          | 1,031,274         | 1,031,274         | 1,031,274         |
| 4        | Total Operating Revenues (Lines 2 + 3)                                 |                   | \$89,484,478       | \$84,118,843      | \$86,832,449      | \$89,491,048      |
| 5        | Operating Expenses   |                   |                    |                   |                   |                   |
| 6        | Power Cost   | WP 1              | \$63,409,146       | \$63,409,146      | \$63,409,146      | \$63,409,146      |
| 7        | Other O&M Expenses Excl Uncollectibles                                 | WP 1              | 12,275,112         | 12,275,112        | 12,275,112        | 12,275,112        |
| 8        | Uncollectibles   | WP 1              | 334,482            | 314,192           | 324,453           | 334,506           |
| 9        | Depreciation   | WP 1              | 4,055,996          | 4,055,996         | 4,055,996         | 4,055,996         |
| 10       | Utilities Receipt Taxes  | WP 1              | 1,218,373          | 1,145,317         | 1,182,264         | 1,218,463         |
| 11       | Other Taxes  | WP 1              | 502,078            | 502,078           | 502,078           | 502,078           |
| 12       | Subtotal Operating Expenses (Sum of Lines 6 thru 11)                   |                   | \$81,795,188       | \$81,701,842      | \$81,749,051      | \$81,795,302      |
| 13       | Non-Operating Revenues and Expenses                                    |                   |                    |                   |                   |                   |
| 14       | Interest and Investment Revenue  | WP 1              | \$98,015           | \$98,015          | \$98,015          | \$98,015          |
| 15       | Other Income and Deductions  | WP 1              | 1,074              | 1,074             | 1,074             | 1,074             |
| 16       | Payment to City In-Lieu of Taxes                                       | WP 1              | (777,792)          | (777,792)         | (777,792)         | (777,792)         |
| 17       | Environmental Remediation  | WP 1              | (2,680,000)        | (2,680,000)       | (2,680,000)       | (2,680,000)       |
| 18       | Subtotal Non-Operating Revenues and Expenses (Sum of Lines 14 thru 17) |                   | -\$3,358,703       | -\$3,358,703      | -\$3,358,703      | -\$3,358,703      |
| 19       | Net Income (Line 4 - Line 12 + Line 18)                                |                   | \$4,330,587        | -\$941,702        | \$1,724,695       | \$4,337,043       |
| 20       | Rate Base  | WP 17             | \$65,714,525       | \$65,714,525      | \$65,714,525      | \$65,714,525      |
| 21       | Return on Rate Base (Line 19 / Line 20)                                |                   | 6.59%              | -1.43%            | 2.62%             | 6.60%             |
|          | Sources and Uses of Cash   |                   |                    |                   |                   |                   |
| 22       | Sources  |                   |                    |                   |                   |                   |
| 23       | Net Income or Return (Line 19)   |                   | \$4,330,587        | -\$941,702        | \$1,724,695       | \$4,337,043       |
| 24       | Depreciation Expense (Line 9)  |                   | 4,055,996          | 4,055,996         | 4,055,996         | 4,055,996         |
| 25       | Environmental Remediation Amortization (Line 17)                       |                   | 2,680,000          | 2,680,000         | 2,680,000         | 2,680,000         |
| 26       | Rate Case Amortization   | WP 1              | 50,000             | 50,000            | 50,000            | 50,000            |
| 27       | Non-Cash Portion of Pension Expense                                    | WP 25             | 1,620,304          | 1,620,304         | 1,620,304         | 1,620,304         |
| 28       | Total Sources (Sum of Lines 23 thru 27)                                |                   | \$12,736,887       | \$7,464,598       | \$10,130,996      | \$12,743,343      |
| 29       | Uses   |                   |                    |                   |                   |                   |
| 30       | Capital Projects   | WP 16             | \$3,564,545        | \$3,564,545       | \$3,564,545       | \$3,564,545       |
| 31       | Remediation Reserve Fund Deposits (equal to Line 25)                   |                   | 2,680,000          | 2,680,000         | 2,680,000         | 2,680,000         |
| 32       | Decommissioning Reserve Fund Deposits                                  | WP 24             | 1,843,964          | 1,843,964         | 1,843,964         | 1,843,964         |
| 33       | Cash Reserve Fund Deposits   | WP 19             | 730,658            | 730,658           | 730,658           | 730,658           |
| 34       | Appropriation Of Retained Earnings to City                             | WP 22             | 1,361,917          | 1,361,917         | 1,361,917         | 1,361,917         |
| 35       | Total Uses (Sum of Lines 30 thru 34)                                   |                   | \$10,181,083       | \$10,181,083      | \$10,181,083      | \$10,181,083      |
| 36       | Annual Net Cash Gain (Loss) (Line 28 - Line 35)                        |                   | \$2,555,804        | -\$2,716,486      | -\$50,088         | \$2,562,260       |
| 37       | Cummulative Net Cash Gain (Loss) (based on Line 36)                    |                   |                    | -\$2,716,486      | -\$2,766,574      | -\$204,314        |

Sources and Uses of Cash WP LAT-23

| Line No.                           | Component  | Source                            | Adjusted Test Year | Phase 1 Year 2021 | Phase 2 Year 2022 | Phase 3 Year 2023 |
|------------------------------------|--|-----------------------------------|--------------------|-------------------|-------------------|-------------------|
| <b>Sensitivity Analysis</b>        |  |                                   |                    |                   |                   |                   |
| <b>Determination of Net Income</b> |  |                                   |                    |                   |                   |                   |
| 1                                  | <b>Operating Revenues</b>  |                                   |                    |                   |                   |                   |
| 2                                  | Revenues from Proposed Rates   | WP 1, Mancinelli Direct Testimony | \$88,453,204       | \$82,256,693      | \$84,093,732      | \$85,832,430      |
| 3                                  | Other Operating Revenues   | WP 1                              | 1,031,274          | 1,031,274         | 1,031,274         | 1,031,274         |
| 4                                  | Total Operating Revenues (Lines 2 + 3)                                 |                                   | \$89,484,478       | \$83,287,968      | \$85,125,006      | \$86,863,704      |
| 5                                  | <b>Operating Expenses</b>  |                                   |                    |                   |                   |                   |
| 6                                  | Power Cost   | WP 1                              | \$63,409,146       | \$62,775,055      | \$62,147,304      | \$61,525,831      |
| 7                                  | Other O&M Expenses Excl Uncollectibles                                 | WP 1                              | 12,275,112         | 12,520,615        | 12,771,027        | 13,026,447        |
| 8                                  | Uncollectibles   | WP 1                              | 334,482            | 311,050           | 317,996           | 324,571           |
| 9                                  | Depreciation   | WP 1                              | 4,055,996          | 4,055,996         | 4,055,996         | 4,055,996         |
| 10                                 | Utilities Receipt Taxes  | WP 1                              | 1,218,373          | 1,134,005         | 1,159,017         | 1,182,690         |
| 11                                 | Other Taxes  | WP 1                              | 502,078            | 502,078           | 502,078           | 502,078           |
| 12                                 | Subtotal Operating Expenses (Sum of Lines 6 thru 11)                   |                                   | \$81,795,188       | \$81,298,798      | \$80,953,419      | \$80,617,614      |
| 13                                 | <b>Non-Operating Revenues and Expenses</b>                             |                                   |                    |                   |                   |                   |
| 14                                 | Interest and Investment Revenue  | WP 1                              | \$98,015           | \$98,015          | \$98,015          | \$98,015          |
| 15                                 | Other Income and Deductions  | WP 1                              | 1,074              | 1,074             | 1,074             | 1,074             |
| 16                                 | Payment to City In-Lieu of Taxes                                       | WP 1                              | (777,792)          | (777,792)         | (777,792)         | (777,792)         |
| 17                                 | Environmental Remediation  | WP 1                              | (2,680,000)        | (2,680,000)       | (2,680,000)       | (2,680,000)       |
| 18                                 | Subtotal Non-Operating Revenues and Expenses (Sum of Lines 14 thru 17) |                                   | -\$3,358,703       | -\$3,358,703      | -\$3,358,703      | -\$3,358,703      |
| 19                                 | <b>Net Income (Line 4 - Line 12 + Line 18)</b>                         |                                   | \$4,330,587        | -\$1,369,534      | \$812,884         | \$2,887,387       |
| 20                                 | <b>Rate Base</b>   | WP 17                             | \$65,714,525       | \$65,714,525      | \$65,714,525      | \$65,714,525      |
| 21                                 | <b>Return on Rate Base (Line 19 / Line 20)</b>                         |                                   | 6.59%              | -2.08%            | 1.24%             | 4.39%             |
| <b>Sources and Uses of Cash</b>    |  |                                   |                    |                   |                   |                   |
| 22                                 | <b>Sources</b>   |                                   |                    |                   |                   |                   |
| 23                                 | Net Income or Return (Line 19)   |                                   | \$4,330,587        | -\$1,369,534      | \$812,884         | \$2,887,387       |
| 24                                 | Depreciation Expense (Line 9)  |                                   | 4,055,996          | 4,055,996         | 4,055,996         | 4,055,996         |
| 25                                 | Environmental Remediation Amortization (Line 17)                       |                                   | 2,680,000          | 2,680,000         | 2,680,000         | 2,680,000         |
| 26                                 | Rate Case Amortization   | WP 1                              | 50,000             | 50,000            | 50,000            | 50,000            |
| 27                                 | Non-Cash Portion of Pension Expense                                    | WP 25                             | 1,620,304          | 1,620,304         | 1,620,304         | 1,620,304         |
| 28                                 | Total Sources (Sum of Lines 23 thru 27)                                |                                   | \$12,736,887       | \$7,036,766       | \$9,219,184       | \$11,293,687      |
| 29                                 | <b>Uses</b>  |                                   |                    |                   |                   |                   |
| 30                                 | Capital Projects   | WP 16                             | \$3,564,545        | \$3,564,545       | \$3,564,545       | \$3,564,545       |
| 31                                 | Remediation Reserve Fund Deposits (equal to Line 25)                   |                                   | 2,680,000          | 2,680,000         | 2,680,000         | 2,680,000         |
| 32                                 | Decommissioning Reserve Fund Deposits                                  | WP 24                             | 1,843,964          | 1,843,964         | 1,843,964         | 1,843,964         |
| 33                                 | Cash Reserve Fund Deposits   | WP 18                             | 730,658            | 730,658           | 730,658           | 730,658           |
| 34                                 | Appropriation Of Retained Earnings to City                             | WP 22                             | 1,361,917          | 1,361,917         | 1,361,917         | 1,361,917         |
| 35                                 | Total Uses (Sum of Lines 30 thru 34)                                   |                                   | \$10,181,083       | \$10,181,083      | \$10,181,083      | \$10,181,083      |
| 36                                 | Annual Net Cash Gain (Loss) (Line 28 - Line 35)                        |                                   | \$2,555,804        | -\$3,144,317      | -\$961,900        | \$1,112,604       |
| 37                                 | Cummulative Net Cash Gain (Loss) (based on Line 36)                    |                                   |                    |                   | -\$4,106,217      | -\$2,993,613      |
| 38                                 | <b>O&amp;M Inflation Adjustment (2% per year)</b>                      |                                   |                    | 2.0%              | 4.0%              | 6.1%              |
| 39                                 | <b>Decrease in Sales Adjustment (1% per year)</b>                      |                                   |                    | -1.0%             | -2.0%             | -3.0%             |



## WWVS Estimated Decommissioning Costs - LAT WP-24

|          | A   | B               | C                | D                      | E                |
|----------|---|-----------------|------------------|------------------------|------------------|
| Line No. | Category  |                 |                  |                        |                  |
| 1        | <b>Coal-Fired Steam Plant Dismantlement Study Results</b> |                 |                  |                        |                  |
| 2        |   |                 |                  | <b>Inflation</b>       | <b>2019</b>      |
| 3        |   |                 | <b>Dismantle</b> | <b>Adjustment</b>      | <b>Inflation</b> |
| 4        |   | <b>Estimate</b> | <b>Cost</b>      | <b>to 2019 \$</b>      | <b>Adjusted</b>  |
| 5        |   | <b>Year</b>     | <b>(\$/kW)</b>   | <b>(Handy Whitman)</b> | <b>(\$/kW)</b>   |
| 6        | Cayuga Station (Duke)                                     | 2018            | \$ 60.55         | 2.3%                   | \$ 61.96         |
| 7        | Fayette 1&2 (AE)  | 2015            | \$ 38.45         | 9.9%                   | \$ 42.25         |
| 8        | Xcel Energy (PSCo)  | 2013            | \$ 77.00         | 16.2%                  | \$ 89.49         |
| 9        | Deely (CPS)   | 2012            | \$ 119.00        | 18.6%                  | \$ 141.17        |
| 10       | Survey of PUC Cases                                       | 2012            | \$ 40.00         | 18.6%                  | \$ 47.45         |
| 11       | Average   |                 |                  |                        | \$ 76.47         |

## Non-Cash Portion of Pension Expense LAT WP-25

|          |         | A                                    | B      | C            |             | D                  | E |
|----------|---------|--------------------------------------|--------|--------------|-------------|--------------------|---|
| Line No. | Account | Category                             | Source | Test Year    | Adjustments | Adjusted Test Year |   |
| 1        | 92610   | Empl Benefits-Pension                | WP 8   | \$ 2,192,884 | \$ (18,373) | \$ 2,174,511       |   |
| 2        | 92610   | Non-Cash Portion of Interest Expense | RP&L   | \$ 1,633,994 | \$ (13,690) | \$ 1,620,304       |   |
| 3        |         | % of Pension Expense                 |        | 75%          | 75%         | 75%                |   |

Document: 1989 Ind. PUC LEXIS 427

## 1989 Ind. PUC LEXIS 427

Copy Citation

Indiana Utility Regulatory Commission

December 13, 1989, Approved

CAUSE NO. **36835-S3**

### Reporter

**1989 Ind. PUC LEXIS 427 \***

In the Matter of the Indiana Municipal Power Agency and the Indiana Cities and Towns, Members Thereof, to Modify, Simplify and Make More Equitable Certain Tracking Procedures Heretofore Authorized By This Commission to Track Increases or Decreases in the Cost of Purchased Power and Energy by Such Members From the Indiana Municipal Power Agency

### Core Terms

track, energy, estimate, base rate, municipality, notice, retail

**Panel:** Monk, Bailey, Corban, O'Lessker and Zagrovich concur

**Opinion By:** Frederick L. Corban, Commissioner; Scott R. Jones, Assistant Chief Administrative Law Judge

### Opinion

The Indiana cities and towns of Anderson, Bargersville, Centerville, Covington, Crawfordsville, Edinburgh, Flora, Frankfort, Frankton, Greendale, Greenfield, Lawrenceburg, Lebanon, Linton, Middletown, Paoli, Pendleton, Peru, Richmond, Rising Sun, Scottsburg, Tipton and Washington (collectively "the Petitioners") filed their petition instituting the above-captioned Cause on July 21, 1989. The petition seeks to modify the energy cost adjustment and power cost tracking procedures and forms approved by this Commission in its May 2, 1984 Order in Cause No. 36836-S2 and to authorize the Petitioners to use the modified procedures and forms in order to secure the Commission's approval of adjustments to their retail rates.

A hearing was held in this Cause at 9:30 A.M., EST, on December 1, 1989. Proper notice was provided as required by law, and the proofs of publication were incorporated into the record by reference. Petitioners and the Office of the Utility Consumer Counselor ("Public") appeared and participated at the hearing. No members of **[\*2]** the general public appeared or participated.

During the hearing on December 1, 1989, Petitioners offered into evidence, without objection, the testimony of L. Gayle Mayo and Donald E. Gimbel as Petitioners' Exhibits LGM and DEG respectively. Petitioners also moved the Commission to take

administrative notice of its October 27, 1982, January 11, 1983 and May 2, 1984 Orders in Cause Nos. 36835, 36835-S1 and 36835-S2 respectively. Petitioner's motion was granted and copies of the notice orders were received into the record of the proceedings in this Cause as part of Petitioners' case-in-chief. The report of the Commission's Engineering Staff, sponsored by Mr. Michael J. Mooney, was received into evidence pursuant to I.C. 8-1-1-5. No rebuttal evidence was offered by Petitioners.

Based upon the applicable law and the evidence herein, the Commission now finds:

1. Commission Jurisdiction and Notice. Due, legal and timely notice of the public hearing in this Cause was given and published as required by law. Each of the Petitioners is an Indiana municipality that operates an electric utility system distributing power and energy to industrial, commercial and residential customers [\*3] and qualifies as a "municipally owned utility" as defined in I.C. 8-1-2-1. Petitioners are each subject to the jurisdiction of the Commission in the manner and to the extent allowed by the laws of the State of Indiana. The Commission has jurisdiction over the Petitioners and the subject matter of this proceeding.

2. Background Findings. Petitioners purchase their power and energy requirements from the Indiana Municipal Power Agency ("IMPA"). In Cause No. 36835, IMPA requested, in addition to other relief, that the Commission approve certain energy cost adjustment and power cost tracking procedures for use by its members that would allow each member to track to its retail customers increases or decreases in the cost of power and energy purchased from IMPA. As shown by the Commission's October 27, 1982 Order in Cause No. 36835, the Commission deferred action on IMPA's request, but created a subdocket (Cause No. 36835-S1) in order to fully explore the use of tracking procedures by IMPA's members.

After a public hearing, the Commission issued on January 11, 1983, its Order in Cause No. 36835-S1 in which it approved certain energy cost adjustment and power cost tracking procedures [\*4] for use by IMPA's members and prescribed the use of certain forms reflecting those procedures. The Commission also ordered as part of its Order in Cause No. 36835-S1 that another subdocket (Cause No. 36835-S2) should be established for the purpose of reviewing and evaluating the tracking procedures approved in Cause No. 36835-S1.

After a hearing conducted on March 26, 1984, the Commission issued its Order in Cause No. 36835-S2 on May 2, 1984 and approved the use by IMPA's members of tracking procedures similar to those authorized by the Commission in Cause No. 36835-S1. The Commission also authorized the use of new forms reflecting the newly-approved procedures for the purpose of filing for retail rate adjustments. The new forms included some based on the "One-Part" forms previously approved by the Commission in Cause No. 36835-S1 and, for certain of IMPA's members that had the results of a reliable cost of service study and sufficient billing capability, completely new "Two-Part" forms. The Two-Part forms separate costs into demand and energy components and enable the IMPA members utilizing them to calculate retail rate adjustments for individual rate classes.

The Commission [\*5] also found in its May 2, 1984 Order in Cause No. 35835-S2 that any municipality becoming a member of IMPA after the Order in Cause No. 36835-S1 could utilize the One-Part forms that had been approved by the Commission.

The primary purpose of the tracking procedures approved by the Commission for use by IMPA's members was to replace the fuel cost and wholesale power cost tracking procedures with procedures that allowed the energy cost adjustment charges portion of the costs billed by IMPA to its members to be appropriately reconciled on a quarterly basis. That purpose was accomplished under the procedures approved in Cause No. 36835-S2, which IMPA's members now have been using for over five years. However, as a result of their experience, Petitioners believe that the current procedures and forms need to be modified in order to make the use of tracking procedures by IMPA's members more effective and equitable. Accordingly, Petitioners are seeking in this Cause the Commission's approval of, and authorization to use, revised tracking procedures and forms. The revised forms, which reflect the specific procedures that Petitioners are seeking approval of in this Cause, were introduced [\*6] into evidence with Ms. Mayo's testimony as Petitioners' Exhibits LGM-1 and LGM-2 and are attached hereto as Exhibits A and B. Exhibit A (LGM-1) is a revised One-Part form and Exhibit B (LGM-2) is a revised Two-Part form.

3. Additional Findings. Although formatted differently, the proposed forms generally provide for a continuation of the methodology and principles reflected in the forms currently in use by IMPA's members. However, the proposed forms treat changes in IMPA's base rates and capacity payments differently than the manner in which they are currently treated.

The present forms used by IMPA's members rely on prior year base rate changes to determine a total annual change in the base cost of purchased power. This method is not completely accurate because the total annual change is determined using previous year billing determinants and the resulting unit costs charges are then multiplied by an estimate of the next quarter's billing determinants. Under the proposed forms each of IMPA's members will calculate per unit changes between its current wholesale power costs and the wholesale power costs reflected in its current rates, and then multiply those changes by the [\*7] next quarter's estimated billing determinants. This will result in the calculation of a truer change in the member's costs attributable to IMPA's base rates and lessen, but not eliminate by itself, the possibility that the member will overcollect or undercollect from its retail ratepayers.

To eliminate the possibility of overcollection or undercollection, the proposed forms include a base rate change reconciliation procedure under which each quarter's estimation of the billing determinants used by a member to bill its ratepayers is reconciled with the actual billing determinants used by IMPA to bill the member. Pursuant to the reconciliation procedure, the proposed forms require IMPA's members to take into consideration IMPA's base rates, together with IMPA's energy cost adjustment factor, in determining a quarterly variance between what the member billed its ratepayers and what IMPA billed the member resulting in a dollar for dollar flow through of IMPA's base rates and energy cost adjustment charges.

The proposed forms also reflect a change in regard to the capacity payments of IMPA members that have generating resources. The forms currently in use require an estimation of [\*8] generating costs and payments for the entire year, beginning January 1, in September of the preceding year. This creates a sizable gap between the date of estimation and the final months of the estimated year. The proposed forms require the use of current estimates of member generating costs and payments from IMPA on a quarterly rather than on a yearly basis. This will also allow the affected IMPA members to more closely track changes in their costs from IMPA.

The data required to complete the proposed forms is very similar to that needed in connection with the present forms. Accordingly, it does not appear that the Petitioners, the Commission's Staff or the Office of the Utility Consumer Counselor will experience any great difficulties in connection with the use of the proposed forms in lieu of those currently in use.

All of the testimony and exhibits introduced in this Cause support, without reservation, the relief Petitioners are seeking.

4. Conclusion. The Commission finds the Petitioners' proposed forms, and the tracking procedures that they reflect, are fair, just, reasonable, adequate, non-discriminatory and do not grant any undue preference. Therefore, we find **[\*9]** the proposed procedures and forms should be approved for use by Petitioners and all municipalities becoming members of IMPA after July 21, 1989, the date Petitioners filed their petition instituting this Cause.

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION, that:

1. The energy cost adjustment and power cost tracking procedures that Petitioners have proposed and that are reflected in the forms attached hereto as Exhibit A and B are approved.
2. Petitioners and all municipalities becoming members of IMPA after July 21, 1989 shall be and are hereby authorized to use the forms attached hereto as Exhibits A and B in the manner allowed by the Commission's January 11, 1983 Order in Cause No. 36835-S1 and its May 2, 1984 Order in Cause No. 36835-S2.
3. The determination of which of the two sets of forms each of the Petitioners shall use shall continue to be governed by the provisions of the Commission's May 2, 1984 Order in Cause No. 36835-S2.
4. This Order shall be effective on and after the date of its approval.

EXHIBIT A [SEE ILLUSTRATION IN ORIGINAL]

EXHIBIT B [SEE ILLUSTRATION IN ORIGINAL]

Content Type: Administrative Materials

Terms: 36835-S3

Narrow By: Sources: IN Utility Regulatory Commission Decisions Content Type: Administrative Materials

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Print

March 24, 2020

**Via Electronic Filing – 30 Day Filings – Electric**

Brenda A. Howe  
Secretary of the Commission  
Indiana Utility Regulatory Commission  
101 West Washington St., Suite 1500 E  
Indianapolis, IN 46204

**RE: Richmond Power & Light 30 Day Filing Pursuant to 170 IAC 1-6-1 et seq.**

Dear Ms. Howe:

Pursuant to 170 IAC 1-6-5, please find enclosed the following 30 Day Filing by Richmond Power & Light: 1st Quarter 2021 ECA. The tariff sheets and work papers are attached. The purpose of this filing is to obtain approval from the Commission. This filing is necessary to allow Richmond Power & Light to recapture the actual costs of providing electricity. This filing is allowed under 170 IAC 1-6-3 for the following reasons: A filing for which the commission has already approved or accepted the procedure for the change.

The person at Richmond Power & Light to be contacted regarding this filing is:

Sandra Lambert  
(765) 973-7200  
2000 US 27 S, P.O. Box 908, Richmond, IN 47375-0908  
sandal@rp-l.com

Affected customers have been notified as required under 170 IAC 1-6-6. Notice will be published in the Palladium Item on Tuesday December 11, 2018. Notice has been posted in a public place in the Richmond Power & Light customer service office. Notice has also been posted on the Richmond Power & Light website at <http://www.rp-l.com/>. A copy of the notice is attached.

I verify that notice has been provided as stated in this letter and that this letter and the attached documents are true and accurate to the best of my knowledge, information, and belief.

Sincerely,

Sandra Lambert  
Finance Manager

March 24, 2020

Brad Borum  
Indiana Utility Regulatory Commission  
Electricity Division  
PNC Center  
101 West Washington Street  
Suite 1500 East  
Indianapolis, IN 46204-3407

TO THE INDIANA UTILITY REGULATORY COMMISSION:

- Richmond Power & Light, 2000 U.S. 27 South, Richmond, Indiana, under and
1. pursuant to the Public Service Commission Act, as amended, and Commission Order in Cause No. 36835-S3, hereby files with the Indiana Utility Regulatory Commission for its approval, an average decrease in its schedule of rates for electricity sold in the amount of \$0.000000 per kilowatt-hour (KWH).  
The accompanying changes in schedules of rates are based solely upon the
  2. changes in the cost of purchased power and energy, purchased by this utility computed in accordance with the Indiana Utility Regulatory Commission Order in Cause No. 36835-S3, dated December 13, 1989.  
All of the matters and facts stated herein and in the attached exhibits are true
  3. and correct. If approved, this change of rate shall take effect for the bills to be rendered beginning with the January 2021 billing cycle.

City of Richmond, Indiana

---

Randall Baker

## **RICHMOND POWER & LIGHT**

### **ECA Appendix A**

#### Rate Adjustments

The Rate Adjustments shall be on the basis of a Purchase Power Cost Adjustment Tracking Factor occasioned solely by changes in the cost of purchased power and energy, in accordance with the Order of the Indiana Utility Regulatory Commission, approved December 13, 1989 in Cause No. 36835-S3, as follows:

Rate Adjustments applicable to the below listed Rate Schedules are as follows:

|            |    |   |         |
|------------|----|---|---------|
| R          | \$ | - | per KWH |
| CL         | \$ | - | per KWH |
| EHS        | \$ | - | per KWH |
| GP and GEH | \$ | - | per KW  |
|            | \$ | - | per KWH |
| LPSS       | \$ | - | per KVA |
|            | \$ | - | per KWH |
| LPSS COIN  | \$ | - | per KW  |
|            | \$ | - | per KWH |
| LPSP       | \$ | - | per KVA |
|            | \$ | - | per KWH |
| LPSP COIN  | \$ | - | per KW  |
|            | \$ | - | per KWH |
| ISS        | \$ | - | per KVA |
|            | \$ | - | per KWH |
| ISS COIN   | \$ | - | per KW  |
|            | \$ | - | per KWH |
| ISP        | \$ | - | per KVA |
|            | \$ | - | per KWH |
| ISP COIN   | \$ | - | per KW  |
|            | \$ | - | per KWH |
| LS         | \$ | - | per KWH |
| TS         | \$ | - | per KVA |
|            | \$ | - | per KWH |
| TS COIN    | \$ | - | per KW  |
|            | \$ | - | per KWH |

January , February and March 2021



**LEGAL AD**

Notice is hereby given that the municipal electric utility of the City of Richmond, Indiana known as Richmond Power and Light, under and pursuant to the Public Service Commission Act, as amended, and Commission Order in Cause No. 36835-S3, has filed with the Indiana Utility Regulatory Commission for its approval in the Rate Adjustment factors listed below by Rate Schedules:

|            |    |   |         |
|------------|----|---|---------|
| R          | \$ | - | per KWH |
| CL         | \$ | - | per KWH |
| EHS        | \$ | - | per KWH |
| GP and GEH | \$ | - | per KW  |
|            | \$ | - | per KWH |
| LPSS       | \$ | - | per KVA |
|            | \$ | - | per KWH |
| LPSS COIN  | \$ | - | per KW  |
|            | \$ | - | per KWH |
| LPSP       | \$ | - | per KVA |
|            | \$ | - | per KWH |
| LPSP COIN  | \$ | - | per KW  |
|            | \$ | - | per KWH |
| ISS        | \$ | - | per KVA |
|            | \$ | - | per KWH |
| ISS COIN   | \$ | - | per KW  |
|            | \$ | - | per KWH |
| ISP        | \$ | - | per KVA |
|            | \$ | - | per KWH |
| ISP COIN   | \$ | - | per KW  |
|            | \$ | - | per KWH |
| LS         | \$ | - | per KWH |
| TS         | \$ | - | per KVA |
|            | \$ | - | per KWH |
| TS COIN    | \$ | - | per KW  |
|            | \$ | - | per KWH |

Rate adjustment changes are listed below by Rate Schedules:

|            |          |    |   |         |
|------------|----------|----|---|---------|
| R          | decrease | \$ | - | per KWH |
| CL         | decrease | \$ | - | per KWH |
| EHS        | decrease | \$ | - | per KWH |
| GP and GEH | decrease | \$ | - | per KW  |
|            | decrease | \$ | - | per KWH |
| LPSS       | decrease | \$ | - | per KVA |
|            | decrease | \$ | - | per KWH |
| LPSS COIN  | decrease | \$ | - | per KW  |
|            | decrease | \$ | - | per KWH |
| LPSP       | decrease | \$ | - | per KVA |
|            | decrease | \$ | - | per KWH |
| LPSP COIN  | decrease | \$ | - | per KW  |
|            | decrease | \$ | - | per KWH |
| ISS        | decrease | \$ | - | per KVA |
|            | decrease | \$ | - | per KWH |
| ISS COIN   | decrease | \$ | - | per KW  |
|            | decrease | \$ | - | per KWH |
| ISP        | decrease | \$ | - | per KVA |
|            | decrease | \$ | - | per KWH |
| ISP COIN   | decrease | \$ | - | per KW  |
|            | decrease | \$ | - | per KWH |
| LS         | decrease | \$ | - | per KWH |
| TS         | decrease | \$ | - | per KVA |
|            | decrease | \$ | - | per KWH |
| TS COIN    | decrease | \$ | - | per KW  |
|            | decrease | \$ | - | per KWH |

The accompanying changes in schedules of rate are based solely upon the changes in the cost of purchased power and energy, purchased by this utility computed in accordance with the Public Service Commission of Indiana order in Cause No. 36835-S3, dated December 13, 1989.

If approved, this change of rate shall take effect for the bills to be rendered beginning with the January 2021 billing cycle.

Richmond Power and Light  
City of Richmond, Indiana  
Randy Baker, General Manager

Any objections can be made to either of the following:

|                                       |                                      |
|---------------------------------------|--------------------------------------|
| Indiana Utility Regulatory Commission | Office of Utility Consumer Counselor |
| PNC Center                            | PNC Center                           |
| 101 W. Washington Street              | 115 W. Washington Street             |
| Suite 1500 East                       | Suite 1500 South                     |
| Indianapolis, IN 46204-3407           | Indianapolis, IN 46204-3407          |

(Contact person – Sandra Lambert 973-7200)

Please print this legal one (1) time and return two (2) proofs of publication.

**PLEASE RUN THIS AS SOON AS POSSIBLE**

Thank You

Randy Baker personally appeared before me, a Notary Public in and for said county and state, this        March 24, 2020       , who, after having been duly sworn according to law, stated that he is an officer of the City of Richmond, Indiana, that he has read the matters and facts stated above, and in all exhibits attached hereto, and that the same are true; that he is duly authorized to execute this instrument for and on behalf of the applicant herein.

My County of Residence: Wayne

ECA Exhibit I

CITY OF RICHMOND, INDIANA

---

DETERMINATION OF INCREMENTAL CHANGE IN BASE RATE

| LINE NO. | DESCRIPTION                         |           |     | DEMAND RELATED | ENERGY RELATED | LINE NO. |
|----------|-------------------------------------|-----------|-----|----------------|----------------|----------|
| 1        | BASE RATE EFFECTIVE                 | 01-Jan-21 | (a) | \$22.785       | \$0.026608     | 1        |
| 2        | BASE RATE EFFECTIVE                 | 2019 TY   | (b) | \$22.785       | \$0.026608     | 2        |
| 3        | INCREMENTAL CHANGE IN BASE RATE (c) |           |     | \$0.000        | \$0.000000     | 3        |

---

(a) IMPA rate effective for the period covered by this filing. The Base Rate includes the applicable Area Adjustment and Delivery Voltage Adjustment.

(b) Base purchased power rate including Area and Voltage Adjustments effective at the time of the member's last approved rate case was filed or January 27, 1983, whichever is more recent.

(c) Line 1 - Line 2

ECA Exhibit II

CITY OF RICHMOND, INDIANA

ESTIMATION OF SAVINGS FROM DEDICATED CAPACITY PAYMENTS  
FOR THE THREE MONTHS OF:

|          | Jan-21                                    | Feb-21         | Mar-21 |          |
|----------|---|----------------|--------|----------|
| LINE NO. | DESCRIPTION                               | DEMAND RELATED |        | LINE NO. |
| 1        | ESTIMATED MONTHLY GENERATING COSTS (h)    | \$0.00         |        | 1        |
| 2        | LESS: MONTHLY GEN COSTS IN BASE RATES (i) | \$0.00         |        | 2        |
| 3        | EST GENERATING COSTS IN TRACKER (a)       | \$0.00         |        | 3        |
| 4        | EST MONTHLY PAYMENT FROM IMPA (f)         | \$0.00         |        | 4        |
| 5        | LESS: MONTHLY PAYMENTS IN BASE RATES (g)  | \$0.00         |        | 5        |
| 6        | EST CAPACITY PAYMENTS IN TRACKER (b)      | \$0.00         |        | 6        |
| 7        | ESTIMATED MONTHLY COSTS/(SAVINGS) (c)     | \$0.00         |        | 7        |
| 8        | ESTIMATED AVERAGE MONTHLY KW (d)          | 142,000        |        | 8        |
| 9        | ESTIMATED COSTS/(SAVINGS) PER KW (e)      | \$0.000000     |        | 9        |

(a) Line 1 - Line 2

(b) Line 4 - Line 5

(c) Line 3 - Line 6 Times The Number Of Years Since Last Cost Of Service Study

(d) Exhibit III, Column E, Line 1

(e) Line 7 divided by Line 8

(f) Capacity Payments Forecasted By Indiana Municipal Power Agency

(g) Average capacity payments for 12 months ending March, 2004

(h) Estimated Generating Costs (see attachment)

(i) Average generating cost for 12 months ending March, 2004

Attachment LAT-4 - New RP&L ECA Model and Related Documentation

ECA Exhibit III

| CITY OF RICHMOND, INDIANA  |                                   |            |            |            |             |                                 |             |
|--|-----------------------------------|------------|------------|------------|-------------|---------------------------------|-------------|
| ESTIMATION OF ENERGY COST ADJUSTMENT<br>FOR THE THREE MONTHS OF: |                                   |            |            |            |             |                                 |             |
| LINE<br>NO.  | DESCRIPTION                       | Jan-21     | Feb-21     | Mar-21     | TOTAL       | ESTIMATED<br>3 MONTH<br>AVERAGE | LINE<br>NO. |
|  |                                   | (A)        | (B)        | (C)        | (D)         | (E)                             |             |
|  | PURCHASED POWER FROM IMPA         |            |            |            |             |                                 |             |
| 1  | KW DEMAND                         | 142,000    | 142,000    | 142,000    | 426,000     | 142,000                         | 1           |
| 2  | KWH ENERGY                        | 78,019,081 | 78,019,081 | 78,019,081 | 234,057,244 | 78,019,081                      | 2           |
|  | INCREMENTAL PURCHASED POWER COSTS |            |            |            |             |                                 |             |
|  | DEMAND RELATED                    |            |            |            |             |                                 |             |
| 3  | ECA FACTOR PER KW                 | 0.000      | 0.000      | 0.000      |             | 0.000                           | 3           |
| 4  | CHARGE (a)                        | \$0.00     | \$0.00     | \$0.00     | \$0.00      | \$0.00                          | 4           |
|  | ENERGY RELATED                    |            |            |            |             |                                 |             |
| 5  | ECA FACTOR PER KWH                | 0.000000   | 0.000000   | 0.000000   |             | 0.000000                        | 5           |
| 6  | CHARGE (b)                        | \$0.00     | \$0.00     | \$0.00     | \$0.00      | \$0.00                          | 6           |

(a) Line 1 times Line 3  
(b) Line 2 times Line 5

CITY OF RICHMOND, INDIANA

DETERMINATION OF RATE ADJUSTMENT FOR THE  
THREE MONTHS OF

Jan-21

Feb-21

Mar-21

| LINE<br>NO. | DESCRIPTION  | DEMAND<br>RELATED | ENERGY<br>RELATED | LINE<br>NO. |
|-------------|--|-------------------|-------------------|-------------|
|             |  | (A)               | (B)               |             |
| 1           | INCREMENTAL CHANGE IN BASE RATE (a)                                      | \$0.000           | \$0.000000        | 1           |
| 2           | ESTIMATED SAVINGS (LOSS) FROM DEDICATED<br>CAPACITY PAYMENTS (b)         | \$0.000000        | --                | 2           |
| 3           | ESTIMATED PURCHASED POWER ENERGY<br>COST ADJUSTMENT (c)                  | \$0.000000        | \$0.000000        | 3           |
| 4           | ESTIMATED TOTAL CHANGE IN PURCHASED<br>POWER RATE                        | \$0.000000        | \$0.000000        | 4           |
| 5           | EST CHANGE IN PURCHASED POWER RATE<br>ADJ FOR LOSSES & GR INCOME TAX (d) | \$0.000000        | \$0.000000        | 5           |
| 6           | PLUS TRACKING FACTOR EFFECTIVE<br>PRIOR TO JANUARY 27, 1983 (e)          | \$0.000           | \$0.000000        | 6           |
| 7           | ESTIMATED TOTAL RATE ADJUSTMENT  | \$0.000000        | \$0.000000        | 7           |
| 8           | ESTIMATED AVERAGE BILLING UNITS (f)                                      | 142,000           | 78,019,081        | 8           |
| 9           | ESTIMATED INCREMENTAL CHANGE IN<br>PURCHASED POWER COST (g)              | \$0.00            | \$0.00            | 9           |

(a) Exhibit I, Line 3

(b) Exhibit II, Line 9

(c) Exhibit III, Column E, Lines 3 and 5

(d) Line 4 divided by (1 - line loss factor)(0.986)

= 0.951004534

(e) Tracking Factor effective prior to January 27, 1983. This factor is zero if new rates have been filed and approved since January 27, 1983.

(f) Exhibit III, Column E, Lines 1 and 2

(g) Line 7 times Line 8

CITY OF RICHMOND, INDIANA

DETERMINATION OF RATE ADJUSTMENT FOR THE  
THREE MONTHS OF:

| LINE<br>NO. | RATE<br>SCHEDULE               | KW DEMAND<br>ALLOCATOR<br>(%) (a) | KWH ENERGY<br>ALLOCATOR<br>(%) (a) | Jan-21<br><br>ALLOCATED<br>ESTIMATED KW<br>PURCHASED (b) | Feb-21<br><br>ALLOCATED<br>ESTIMATED KWH<br>PURCHASED (c) | Mar-21<br><br>INCREMENTAL CHANGE IN PURCHASED POWER COST<br>ADJ FOR LINE LOSSES & GROSS RECEIPTS TAX |            |        | LINE<br>NO. |
|-------------|--------------------------------|-----------------------------------|------------------------------------|--|---|--|------------|--------|-------------|
|             |                                |                                   |                                    |  |   | DEMAND (d)   | ENERGY (e) | TOTAL  |             |
|             |                                |                                   |                                    |  |   | (E)  | (F)        | (G)    |             |
| 1           | R                              | 0.121%                            | 0.147%                             | 171.2  | 114,603   | \$0.00   | \$0.00     | \$0.00 | 1           |
| 2           | CL                             | 0.000%                            | 0.000%                             | 0.1  | 80  | \$0.00   | \$0.00     | \$0.00 | 2           |
| 3           | EHS                            | 0.000%                            | 0.000%                             | 0.0  | 0   | \$0.00   | \$0.00     | \$0.00 | 3           |
| 4           | GPS & GEH                      | 35.582%                           | 52.028%                            | 50,527.1   | 40,591,470  | \$0.00   | \$0.00     | \$0.00 | 4           |
| 5           | LPSS, LPSP, ISS, ISP & TS      | 16.197%                           | 10.005%                            | 23,000.0   | 7,806,052   | \$0.00   | \$0.00     | \$0.00 | 5           |
| 6           | LPSS, LPSP, ISS, ISP & TS COIN | 38.028%                           | 0.133%                             | 54,000.0   | 104,081   | \$0.00   | \$0.00     | \$0.00 | 6           |
| 7           | LS                             | 10.072%                           | 37.687%                            | 14,301.6   | 29,402,795  | \$0.00   | \$0.00     | \$0.00 | 7           |
| 8           | 0                              | 0.000%                            | 0.000%                             | 0.0  | 0   | \$0.00   | \$0.00     | \$0.00 | 8           |
| 9           | TOTAL                          | 100.000%                          | 100.000%                           | 142,000.0  | 78,019,081  | \$0.00   | \$0.00     | \$0.00 | 9           |

(a) Taken From Demand & Energy Allocation factor study for the Adjusted Test Year period ending September 30, 2019

(b) Page 1 of 3, Column A, Line 8 times Page 2 of 3, Column A

(c) Page 1 of 3, Column B, Line 8 times Page 2 of 3, Column B

(d) Page 1 of 3, Column A, Line 9 times Page 2 of 3, Column A

(e) Page 1 of 3, Column B, Line 9 times Page 2 of 3, Column B

CITY OF RICHMOND, INDIANA

DETERMINATION OF RATE ADJUSTMENT FOR THE  
THREE MONTHS OF:

Jan-21 Feb-21 Mar-21

TOTAL CHANGE IN PURCHASED POWER COST  
ADJ FOR LINE LOSSES & GROSS RECEIPTS TAX

RATE ADJUSTMENT FACTOR PER KWH (d)

| LINE NO. | RATE SCHEDULE                  | PLUS VARIANCE (a) |        | TOTAL CHANGE IN PURCHASED POWER COST ADJ FOR LINE LOSSES & GROSS RECEIPTS TAX |            |        | RATE ADJUSTMENT FACTOR PER KWH (d) |          |              | LINE NO. |
|----------|--------------------------------|-------------------|--------|---|------------|--------|------------------------------------|----------|--------------|----------|
|          |                                | DEMAND            | ENERGY | DEMAND (b)  | ENERGY (c) | TOTAL  | DEMAND                             | ENERGY   | TOTAL        |          |
|          |                                | (A)               | (B)    | (C)   | (D)        | (E)    | (F)                                | (G)      | (H)          |          |
| 1        | R                              | \$0.00            | \$0.00 | \$0.00  | \$0.00     | \$0.00 | 0.000000                           | 0.000000 | 0.000000     | 1        |
| 2        | CL                             | \$0.00            | \$0.00 | \$0.00  | \$0.00     | \$0.00 | 0.000000                           | 0.000000 | 0.000000     | 2        |
| 3        | EHS                            | \$0.00            | \$0.00 | \$0.00  | \$0.00     | \$0.00 | 0.000000                           | 0.000000 | 0.000000     | 3        |
| 4        | GPS & GEH                      | \$0.00            | \$0.00 | \$0.00  | \$0.00     | \$0.00 | 0.000000                           | 0.000000 | 0.000000 (e) | 4        |
| 5        | LPSS, LPSP, ISS, ISP & TS      | \$0.00            | \$0.00 | \$0.00  | \$0.00     | \$0.00 | 0.000000                           | 0.000000 | 0.000000 (e) | 5        |
| 6        | LPSS, LPSP, ISS, ISP & TS COIN | \$0.00            | \$0.00 | \$0.00  | \$0.00     | \$0.00 | 0.000000                           | 0.000000 | 0.000000 (e) | 6        |
| 7        | LS                             | \$0.00            | \$0.00 | \$0.00  | \$0.00     | \$0.00 | 0.000000                           | 0.000000 | 0.000000     | 7        |
| 8        | 0                              | \$0.00            | \$0.00 | \$0.00  | \$0.00     | \$0.00 | 0.000000                           | 0.000000 | 0.000000     | 8        |
| 9        | TOTAL                          | \$0.00            | \$0.00 | \$0.00  | \$0.00     | \$0.00 | 0.000000                           | 0.000000 | 0.000000     | 9        |

(a) Exhibit IV, Page 4 of 8, Columns D and E divided by (1 - loss factor)(.986) =

0.951004534

(b) Page 2 of 3, Column E plus Page 3 of 3, Column A

(c) Page 2 of 3, Column F plus Page 3 of 3, Column B

(d) Page 3 of 3, Columns C, D and E divided by Page 2 of 3, Column D

(e) See Attachment B for rate adjustment factors.



CITY OF RICHMOND, INDIANA

RECONCILIATION OF VARIANCES FOR THE  
THREE MONTHS OF

| LINE<br>NO. | DESCRIPTION   | Jul-20 | Aug-20            | Sep-20            | LINE<br>NO. |
|-------------|---|--------|-------------------|-------------------|-------------|
|             |   |        | DEMAND<br>RELATED | ENERGY<br>RELATED |             |
|             |   |        | (A)               | (B)               |             |
| 1           | INCREMENTAL CHANGE IN BASE RATE (a)                             |        | \$0.000           | \$0.0000000       | 1           |
| 2           | ACTUAL SAVINGS FROM DEDICATED<br>CAPACITY PAYMENTS (b)          |        | \$0.000           | --                | 2           |
| 3           | ACTUAL PURCHASED POWER ENERGY<br>COST ADJUSTMENT (c)            |        | \$0.000           | \$0.0000000       | 3           |
| 4           | PLUS TRACKING FACTOR EFFECTIVE<br>PRIOR TO JANUARY 27, 1983 (d) |        | \$0.000           | \$0.0000000       | 4           |
| 5           | TOTAL RATE ADJUSTMENT (e)                                       |        | \$0.000           | \$0.0000000       | 5           |
| 6           | ACTUAL AVERAGE BILLING UNITS (f)                                |        | 142,000           | 78,019,081        | 6           |
| 7           | ACTUAL INCREMENTAL CHANGE IN PURCHASED<br>POWER COST (g)        |        | \$0.00            | \$0.00            | 7           |

(a) Attachment 1, Page 1 of 3, Line 1 of Tracker filing for the three months of:  
Jul-20 Aug-20 Sep-20

(b) Exhibit IV, Page 5 of 8, Column E, Line 9

(c) Exhibit IV, Page 6 of 8, Column E, Lines 3 and 5

(d) Tracking Factor effective prior to January 27, 1983  
From page 1 of 3, line 6 Tracker filing for the  
three months of APRIL, MAY AND JUNE 2005

This line is zero if new rates have been approved since January 27, 1983.

(e) Sum of Lines 1 through 4

(f) Exhibit IV, Page 6 of 8, Column E, Lines 1 and 2

(g) Line 5 times Line 6

Attachment LAT-4 - New RP&L ECA Model and Related Documentation

ECA Exhibit IV  
Page 2 of 8

CITY OF RICHMOND, INDIANA

RECONCILIATION OF VARIANCES FOR THE  
THREE MONTHS OF:

| LINE<br>NO. | RATE<br>SCHEDULE               | KW DEMAND<br>ALLOCATOR<br>(%) (a) | KWH ENERGY<br>ALLOCATOR<br>(%) (a) | Jul-20                                  | Aug-20                                   | Sep-20 | INCREMENTAL CHANGE IN PURCHASED POWER COST |            |       | LINE<br>NO. |
|-------------|--------------------------------|-----------------------------------|------------------------------------|---|--|--------|--|------------|-------|-------------|
|             |                                |                                   |                                    | ALLOCATED<br>ACTUAL KW<br>PURCHASED (b) | ALLOCATED<br>ACTUAL KWH<br>PURCHASED (c) |        | DEMAND (d)                                 | ENERGY (e) | TOTAL |             |
|             |                                |                                   |                                    | (C)                                     | (D)                                      | (E)    | (F)  | (G)        |       |             |
| 1           | R                              | 0.121%                            | 0.147%                             | 171.2                                   | 114,603                                  | \$0.00 | \$0.00                                     | \$0.00     |       | 1           |
| 2           | CL                             | 0.000%                            | 0.000%                             | 0.1                                     | 80                                       | \$0.00 | \$0.00                                     | \$0.00     |       | 2           |
| 3           | EHS                            | 0.000%                            | 0.000%                             | 0.0                                     | 0  | \$0.00 | \$0.00                                     | \$0.00     |       | 3           |
| 4           | GPS & GEH                      | 35.582%                           | 52.028%                            | 50,527.1                                | 40,591,470                               | \$0.00 | \$0.00                                     | \$0.00     |       | 4           |
| 5           | LPSS, LPSP, ISS, ISP & TS      | 16.197%                           | 10.005%                            | 23,000.0                                | 7,806,052                                | \$0.00 | \$0.00                                     | \$0.00     |       | 5           |
| 6           | LPSS, LPSP, ISS, ISP & TS COIN | 38.028%                           | 0.133%                             | 54,000.0                                | 104,081                                  | \$0.00 | \$0.00                                     | \$0.00     |       | 6           |
| 7           | LS                             | 10.072%                           | 37.687%                            | 14,301.6                                | 29,402,795                               | \$0.00 | \$0.00                                     | \$0.00     |       | 7           |
| 8           | 0                              | 0.000%                            | 0.000%                             | 0.0                                     | 0  | \$0.00 | \$0.00                                     | \$0.00     |       | 8           |
| 9           | TOTAL                          | 100.000%                          | 100.000%                           | 142,000.0                               | 78,019,081                               | \$0.00 | \$0.00                                     | \$0.00     |       | 9           |

- (a) Page 2 of 3, Columns A and B of tracker filed for the months of  
 (b) Exhibit IV, Page 6 of 8, Column E, Line 1 times Exhibit IV, Page 2 of 7, Column A  
 (c) Exhibit IV, Page 6 of 8, Column E, Line 2 times Exhibit IV, Page 2 of 7, Column B  
 (d) Exhibit IV, Page 1 of 8, Column A, Line 7 times Exhibit IV, Page 2 of 7, Column A  
 (e) Exhibit IV, Page 1 of 8, Column B, Line 7 times Exhibit IV, Page 2 of 7, Column B

Jul-20 Aug-20 Sep-20

Attachment LAT-4 - New RP&L ECA Model and Related Documentation

ECA Exhibit IV  
Page 3 of 8

CITY OF RICHMOND, INDIANA  
RECONCILIATION OF VARIANCES FOR THE  
THREE MONTHS OF:

| LINE NO. | RATE SCHEDULE                  | ACTUAL AVERAGE KWH SALES (a) | ACTUAL AVERAGE KVA/KW SALES (a) | Jul-20                                  | Aug-20                               | Sep-20  | INCREMENTAL KWH ENERGY COST BILLED BY MEMBER (e) | LESS PREVIOUS VARIANCE FOR MONTHS LISTED ABOVE |            | LINE NO. |
|----------|--------------------------------|------------------------------|---------------------------------|---|--------------------------------------|---|--|--|------------|----------|
|          |                                |                              |                                 | DEMAND ADJUSTMENT FACTOR PER KW/KWH (b) | ENERGY ADJUSTMENT FACTOR PER KWH (c) | INCREMENTAL KW DEMAND COST BILLED BY MEMBER (d) |  | DEMAND (f)                                     | ENERGY (g) |          |
|          |                                | (A)                          | (A)                             | (B)                                     | (C)                                  | (D)   | (E)  | (F)  | (G)        |          |
| 1        | R                              | 15,600,000                   |                                 | 0.000000                                | 0.000000                             | \$0.00  | \$0.00   | \$0.00   | \$0.00     | 1        |
| 2        | CL                             | 3,000,000                    |                                 | 0.000000                                | 0.000000                             | \$0.00  | \$0.00   | \$0.00   | \$0.00     | 2        |
| 3        | EHS                            | 40,000                       |                                 | 0.000000                                | 0.000000                             | \$0.00  | \$0.00   | \$0.00   | \$0.00     | 3        |
| 4        | GPS & GEH                      | 11,300,000                   | 38,900                          | 0.000000                                | 0.000000                             | \$0.00  | \$0.00   | \$0.00   | \$0.00     | 4        |
| 5        | LPSS, LPSP, ISS, ISP & TS      | 14,500,000                   | 28,000                          | 0.000000                                | 0.000000                             | \$0.00  | \$0.00   | \$0.00   | \$0.00     | 5        |
| 6        | LPSS, LPSP, ISS, ISP & TS COIN | 30,000,000                   | 54,000                          | 0.000000                                | 0.000000                             | \$0.00  | \$0.00   | \$0.00   | \$0.00     | 6        |
| 7        | LS                             | 810,000                      |                                 | 0.000000                                | 0.000000                             | \$0.00  | \$0.00   | \$0.00   | \$0.00     | 7        |
| 8        | 0                              |                              |                                 | 0.000000                                | 0.000000                             | \$0.00  | \$0.00   | \$0.00   | \$0.00     | 8        |
| 9        | TOTAL                          | 75,250,000                   |                                 |   |                                      | \$0.00  | \$0.00   | \$0.00   | \$0.00     | 9        |

(a) Exhibit IV, Page 7 of 8, Column E

(b) Page 3 of 3, Column F of Tracker Filing for the three months of:

Jul-20

Aug-20

Sep-20

(c) Page 3 of 3, Column G of Tracker Filing for the three months of:

Jul-20

Aug-20

Sep-20

(d) Column A times Column B times the Gross Income Tax Factor of:

0.986

(e) Column A times Column C times the Gross Income Tax Factor of:

0.986

(f) Exhibit IV, Page 4 of 8,, Column D of Tracker Filing for the months of:

Jul-20

Aug-20

Sep-20

(g) Exhibit IV, Page 4 of 8, Column E of Tracker Filing for the months of :

Jul-20

Aug-20

Sep-20

Attachment LAT-4 - New RP&L ECA Model and Related Documentation

ECA Exhibit IV  
Page 4 of 8

CITY OF RICHMOND, INDIANA

RECONCILIATION OF VARIANCES FOR THE  
THREE MONTHS OF:

Jul-20                      Aug-20                      Sep-20

| LINE<br>NO. | RATE<br>SCHEDULE               | NET INCREMENTAL COST BILLED BY MEMBER |            |        | VARIANCE   |            |           | LINE<br>NO. |
|-------------|--------------------------------|---------------------------------------|------------|--------|------------|------------|-----------|-------------|
|             |                                | DEMAND (a)                            | ENERGY (b) | TOTAL  | DEMAND (c) | ENERGY (c) | TOTAL (c) |             |
|             |                                | (A)                                   | (B)        | (C)    | (D)        | (E)        | (F)       |             |
| 1           | R                              | \$0.00                                | \$0.00     | \$0.00 | \$0.00     | \$0.00     | \$0.00    | 1           |
| 2           | CL                             | \$0.00                                | \$0.00     | \$0.00 | \$0.00     | \$0.00     | \$0.00    | 2           |
| 3           | EHS                            | \$0.00                                | \$0.00     | \$0.00 | \$0.00     | \$0.00     | \$0.00    | 3           |
| 4           | GPS & GEH                      | \$0.00                                | \$0.00     | \$0.00 | \$0.00     | \$0.00     | \$0.00    | 4           |
| 5           | LPSS, LPSP, ISS, ISP & TS      | \$0.00                                | \$0.00     | \$0.00 | \$0.00     | \$0.00     | \$0.00    | 5           |
| 6           | LPSS, LPSP, ISS, ISP & TS COIN | \$0.00                                | \$0.00     | \$0.00 | \$0.00     | \$0.00     | \$0.00    | 6           |
| 7           | LS                             | \$0.00                                | \$0.00     | \$0.00 | \$0.00     | \$0.00     | \$0.00    | 7           |
| 8           | 0                              | \$0.00                                | \$0.00     | \$0.00 | \$0.00     | \$0.00     | \$0.00    | 8           |
| 9           | TOTAL                          | \$0.00                                | \$0.00     | \$0.00 | \$0.00     | \$0.00     | \$0.00    | 9           |

(a) Column D minus Column F from Exhibit IV, page 3 of 8

(b) Column E minus Column G from Exhibit IV, Page 3 of 8

(c) Columns E, F, and G from Exhibit IV, Page 2 of 8 minus Columns A, B, and C

Attachment LAT-4 - New RP&L ECA Model and Related Documentation

ECA Exhibit IV  
Page 5 of 8

Exhibit IV  
Page 5 of 8

CITY OF RICHMOND, INDIANA

DETERMINATION OF ACTUAL DEDICATED CAPACITY PAYMENTS  
FOR THE THREE MONTHS OF

| LINE NO. | DESCRIPTION   | Jul-20  | Aug-20  | Sep-20  | TOTAL   | AVERAGE | LINE NO. |
|----------|---|---------|---------|---------|---------|---------|----------|
| -        |   | (A)     | (B)     | (C)     | (D)     | (E)     | -        |
| 1        | ACTUAL MEMBER GENERATING COSTS  | \$0.00  | \$0.00  | \$0.00  | \$0.00  | \$0.00  | 1        |
| 2        | LESS: GENERATING COSTS IN BASE RATES                                    | \$ -    | \$ -    | \$ -    | \$0.00  | \$0.00  | 2        |
| 3        | DIFFERENCE IN ACTUAL TO BASE RATE COSTS (a)                             | \$0.00  | \$0.00  | \$0.00  | \$0.00  | \$0.00  | 3        |
| 4        | ACTUAL MONTHLY PAYMENT FROM IMPA  | \$ -    | \$ -    | \$ -    | \$0.00  | \$0.00  | 4        |
| 5        | LESS: ESTIMATED PAYMENT IN BASE RATES (f)                               | \$ -    | \$ -    | \$ -    | \$0.00  | \$0.00  | 5        |
| 6        | DIFFERENCE IN ACTUAL TO BASE RATE PAYMENT (b)                           | \$0.00  | \$0.00  | \$0.00  | \$0.00  | \$0.00  | 6        |
| 7        | ACTUAL CAPACITY PAYMENT SAVINGS TO BE COLLECTED THROUGH THE TRACKER (c) | \$0.00  | \$0.00  | \$0.00  | \$0.00  | \$0.00  | 7        |
| 8        | ACTUAL MONTHLY KW BILLED (d)  | 142,000 | 142,000 | 142,000 | 426,000 | 142,000 | 8        |
| 9        | ACTUAL CAPACITY PAYMENT SAVINGS PER KW (e)                              | \$0.000 | \$0.000 | \$0.000 |         | \$0.000 | 9        |

(a) Line 1 minus Line 2  
(b) Line 4 minus Line 5  
(c) Line 3 minus Line 6  
(d) Exhibit IV, Page 6 of 8, Line 1  
(e) Line 7 divided by Line 8  
(f) Exhibit II, Line 5

Attachment LAT-4 - New RP&L ECA Model and Related Documentation

ECA Exhibit IV  
Page 6 of 8

CITY OF RICHMOND, INDIANA

DETERMINATION OF ACTUAL ENERGY COST ADJUSTMENT  
FOR THE THREE MONTHS OF:

| LINE NO. | DESCRIPTION                            | Jul-20     | Aug-20     | Sep-20     | TOTAL       | ACTUAL 3 MONTH AVERAGE | LINE NO. |
|----------|--|------------|------------|------------|-------------|------------------------|----------|
| -        |  | (A)        | (B)        | (C)        | (D)         | (E)                    | -        |
|          | PURCHASED POWER FROM IMPA              |            |            |            |             |                        |          |
| 1        | KW DEMAND (a)                          | 142,000    | 142,000    | 142,000    | 426,000     | 142,000                | 1        |
| 2        | KWH ENERGY (a)                         | 78,019,081 | 78,019,081 | 78,019,081 | 234,057,244 | 78,019,081             | 2        |
|          | INCREMENTAL PURCHASED POWER COSTS      |            |            |            |             |                        |          |
|          | DEMAND RELATED                         |            |            |            |             |                        |          |
| 3        | ECA FACTOR PER KW (a)                  | 0.000      | 0.000      | 0.000      |             | 0.000                  | 3        |
| 4        | CHARGE (b)                             | \$0.00     | \$0.00     | \$0.00     | \$0.00      | \$0.00                 | 4        |
|          | ENERGY RELATED                         |            |            |            |             |                        |          |
| 5        | ECA FACTOR PER KWH (a)                 | 0.000000   | 0.000000   | 0.000000   |             | 0.000000               | 5        |
| 6        | CHARGE (c)                             | \$0.00     | \$0.00     | \$0.00     | \$0.00      | \$0.00                 | 6        |
|          | (a) From IMPA bills for the months of: | Jul-20     | Aug-20     | Sep-20     |             |                        |          |
|          | (b) Line 1 times Line 3                |            |            |            |             |                        |          |
|          | (c) Line 2 times Line 5                |            |            |            |             |                        |          |

Attachment LAT-4 - New RP&L ECA Model and Related Documentation

ECA Exhibit IV  
Page 7 of 8

CITY OF RICHMOND, INDIANA

DETERMINATION OF ACTUAL AVERAGE KWH SALES  
FOR THE THREE MONTHS OF:

| LINE NO.                                 | RATE SCHEDULE                  | Jul-20     | Aug-20     | Sep-20     | TOTAL       | AVERAGE    | LINE NO. |
|--|--------------------------------|------------|------------|------------|-------------|------------|----------|
| —  |                                | (A)        | (B)        | (C)        | (D)         | (E)        | —        |
| 1  | R                              | 15,600,000 | 15,600,000 | 15,600,000 | 46,800,000  | 15,600,000 | 1        |
| 2  | CL                             | 3,000,000  | 3,000,000  | 3,000,000  | 9,000,000   | 3,000,000  | 2        |
| 3  | EHS                            | 40,000     | 40,000     | 40,000     | 120,000     | 40,000     | 3        |
| 4  | GPS & GEH                      | 11,300,000 | 11,300,000 | 11,300,000 | 33,900,000  | 11,300,000 | 4        |
| 5  | LPSS, LPSP, ISS, ISP & TS      | 14,500,000 | 14,500,000 | 14,500,000 | 43,500,000  | 14,500,000 | 5        |
| 6  | LPSS, LPSP, ISS, ISP & TS COIN | 30,000,000 | 30,000,000 | 30,000,000 | 90,000,000  | 30,000,000 | 6        |
| 7  | LS                             | 810,000    | 810,000    | 810,000    | 2,430,000   | 810,000    | 7        |
| 8  | 0                              |            |            |            | 0           | 0          | 8        |
| 9  | TOTAL                          | 75,250,000 | 75,250,000 | 75,250,000 | 225,750,000 | 75,250,000 | 9        |
| DETERMINATION OF ACTUAL AVERAGE KW SALES |                                |            |            |            |             |            |          |
| 10                                       | LPS & IS KW                    | 23,000     | 23,000     | 23,000     | 69,000      | 23,000     | 10       |
| 11                                       | LPS-COIN & IS-COIN KW          | 54,000     | 54,000     | 54,000     | 162,000     | 54,000     | 11       |

Attachment LAT

CITY OF RICHMOND, INDIANA

JA Exhibit IV  
Page 8 of 8

| LINE<br>NO. | DETERMINATION OF ACTUAL KW DEMAND ALLOCATION AND KWH ENERGY ALLOCATION FACTORS |   | Rate Study |            |            |           | Rate Study | Adjusted | Adjusted   |
|-------------|--|---|------------|------------|------------|-----------|------------|----------|------------|
|             | Rate Tariffs   |   | Average    | Percent of | kWh Energy |           | kW Demand  | Factors  | kW Demand  |
|             | Code   | Rate Schedule Name/Description  | Sales      | Total kWh  | Factors    | Variance  |            |          | Allocators |
|             |  |   | (A)        | (B)        | (C)        | (D)       | (E)        | (F)      | (G)        |
| 1           | R  | Residential Electric Service  | 44,044     | 0.147%     | 21.087%    | -99.303%  | 25.912%    | 0.181%   | 0.121%     |
| 2           | CL   | Commercial Lighting Service   | 31         | 0.000%     | 3.964%     | -99.997%  | 4.796%     | 0.000%   | 0.000%     |
| 3           | EHS  | Electric Heating Schools Services                                       | 0          | 0.000%     | 0.055%     | 0.000%    | 0.052%     | 0.000%   | 0.000%     |
| 4           | GPS & GEH  | Gen Power & Gen Electric Heat   | 15,600,000 | 52.028%    | 15.277%    | 240.557%  | 15.645%    | 53.280%  | 35.582%    |
| 5           | LPSS, LPSP, ISS, ISP & TS  | Large Power Service, Industrial Service & Transmission Service          | 3,000,000  | 10.005%    | 19.088%    | -47.583%  | 16.955%    | 16.197%  | 16.197%    |
| 6           | LPSS, LPSP, ISS, ISP & TS COIN   | Large Power Service, Industrial Service & Transmission Service Coincide | 40,000     | 0.133%     | 39.435%    | -99.662%  | 36.202%    | 38.028%  | 38.028%    |
| 7           | LS   | Outdoor Lighting, Street Lighting                                       | 11,300,000 | 37.687%    | 1.094%     | 3345.907% | 0.438%     | 15.081%  | 10.072%    |
| 8           | 0  |   | 0          | 0.000%     | 0.000%     | 0.000%    | 0.000%     | 0.000%   | 0.000%     |
| 9           |  | Sales   | 29,984,075 | 100.000%   | 100.000%   |           | 100.000%   | 122.767% | 100.000%   |
| 10          |  | Purchases   | 78,019,081 |            |            |           |            |          |            |
| 11          |  | Average Losses  | 61.6%      |            |            |           |            |          |            |

(A) From utility billing records

7/1/2020

8/1/2020

9/1/2020

(B) (A)/total of column (A)

(C) Taken from last cost of service study.

(D) Column (B)/Column (C)

(E) Taken from last cost of service study

(F) (1 + Column (D)) \* (Column (E))

(G) Column (F)/total of Column (F)



CITY OF RICHMOND, INDIANA

DETERMINATION OF RATE ADJUSTMENT FOR CLASSES WITH DEMAND RATES  
FOR THE THREE MONTHS OF:

|               | Jan-21                                | Feb-21     | Mar-21      |
|---------------|---------------------------------------|------------|-------------|
| LINE NO.<br>- |                                       |            |             |
|               | Rates GPS & GEH                       |            |             |
|               | -----                                 |            |             |
|               | Demand Related Adjustment Factor      |            |             |
| 1             | From Page 3 of 3, Column C, Line 4    | \$0.00     |             |
| 2             | From Page 2 of 3, Column C, Line 4    | 50,527.10  | Coin KW     |
| 3             | Line 1 divided by Line 2              | 0.000000   | per Coin KW |
| 4             | Line 3 multiplied by 57.30%           | 0.000000   |             |
| 5             | Demand Related Rate Adjustment Factor | 0.000000   | per KW      |
|               | Rates GPS & GEH                       |            |             |
|               | -----                                 |            |             |
|               | Energy Related Adjustment Factor      |            |             |
| 6             | From Page 3 of 3, Column D, Line 4    | \$0.00     |             |
| 7             | From Page 2 of 3, Column D, Line 4    | 40,591,470 | KWH         |
| 8             | Line 6 divided by Line 7              | \$0.000000 |             |
| 9             | Energy Related Adjustment Factor      | \$0.000000 | per KWH     |
|               | Rates LPSS, LPSP, ISS, ISP & TS       |            |             |
|               | -----                                 |            |             |
|               | Demand Related Adjustment Factor      |            |             |
| 10            | From Page 3 of 3, Column C, Line 5    | \$0.00     |             |
| 11            | From Page 2 of 3, Column C, Line 5    | 23,000.00  | Coin kW     |
| 12            | Line 10 divided by Line 11            | 0.000000   | per Coin KW |
| 13            | Line 12 multiplied by 82.13%          | 0.000000   |             |
| 14            | Demand Related Rate Adjustment Factor | 0.000000   | per KVA     |
|               | Rates LPSS, LPSP, ISS, ISP & TS       |            |             |
|               | -----                                 |            |             |
|               | Energy Related Adjustment Factor      |            |             |
| 15            | From Page 3 of 3, Column D, Line 5    | \$0.00     |             |
| 16            | From Page 2 of 3, Column D, Line 5    | 7,806,052  | KWH         |
| 17            | Line 15 divided by Line 16            | \$0.000000 |             |
| 18            | Energy Related Adjustment Factor      | \$0.000000 | per KWH     |
|               | Rates LPSS, LPSP, ISS, ISP & TS COIN  |            |             |
|               | -----                                 |            |             |
|               | Demand Related Adjustment Factor      |            |             |
| 19            | From Page 3 of 3, Column C, Line 6    | \$0.00     |             |
| 20            | From Page 2 of 3, Column C, Line 6    | 54,000.00  | Coin kW     |
| 21            | Line 19 divided by Line 20            | 0.000000   | per Coin KW |
| 22            | Demand Related Rate Adjustment Factor | 0.000000   | per KW      |
|               | Rates LPSS, LPSP, ISS, ISP & TS COIN  |            |             |
|               | -----                                 |            |             |
|               | Energy Related Adjustment Factor      |            |             |
| 23            | From Page 3 of 3, Column D, Line 6    | \$0.00     |             |
| 24            | From Page 2 of 3, Column D, Line 6    | 104,081    | KWH         |
| 25            | Line 23 divided by Line 24            | \$0.000000 |             |
| 26            | Energy Related Adjustment Factor      | \$0.000000 | per KWH     |

Energy Cost Adjustment (Revenue Report)

|  | Jul-20     | Aug-20     | Sep-20     |
|--|------------|------------|------------|
| <b>KWH SALES BY RATE CLASS</b>                     |            |            |            |
| Residential R                                      | 15,600,000 | 15,600,000 | 15,600,000 |
| Commercial Lighting Service CL                     | 3,000,000  | 3,000,000  | 3,000,000  |
| Electric Heating Schools EHS                       | 40,000     | 40,000     | 40,000     |
| General Power Service GPS                          | 11,020,000 | 11,020,000 | 11,020,000 |
| General Electric Heating GEH                       | 280,000    | 280,000    | 280,000    |
| Large Power Service Secondary LPSS                 | 5,200,000  | 5,200,000  | 5,200,000  |
| Large Power Service Secondary Coincident LPSS COIN | 11,000,000 | 11,000,000 | 11,000,000 |
| Large Power Service Primary LPSP                   | 0          | 0          | 0          |
| Large Power Service Primary Coincident LPSP COIN   | 14,500,000 | 14,500,000 | 14,500,000 |
| Industrial Service Secondary ISS                   | 0          | 0          | 0          |
| Industrial Service Secondary Coincident ISS COIN   | 0          | 0          | 0          |
| Industrial Service Primary ISP                     | 9,300,000  | 9,300,000  | 9,300,000  |
| Industrial Service Primary Coincident ISP COIN     | 4,500,000  | 4,500,000  | 4,500,000  |
| Lighting Service LS                                | 810,000    | 810,000    | 810,000    |
| Transmission Service TS                            | 0          | 0          | 0          |
| Transmission Service Coincident TS COIN            | 0          | 0          | 0          |
|  | 0          | 0          | 0          |
|  | 0          | 0          | 0          |
|  | 0          | 0          | 0          |
|  | 0          | 0          | 0          |
|  | 0          | 0          | 0          |
|  | 0          | 0          | 0          |
|  | 0          | 0          | 0          |
| TOTAL  | 75,250,000 | 75,250,000 | 75,250,000 |
| <b>KWH SALES BY RATE CATEGORY</b>                  |            |            |            |
| R  | 15,600,000 | 15,600,000 | 15,600,000 |
| CL   | 3,000,000  | 3,000,000  | 3,000,000  |
| EHS  | 40,000     | 40,000     | 40,000     |
| GPS & GEH  | 11,300,000 | 11,300,000 | 11,300,000 |
| LPSS, LPSP, ISS, ISP & TS                          | 14,500,000 | 14,500,000 | 14,500,000 |
| LPSS, LPSP, ISS, ISP & TS COIN                     | 30,000,000 | 30,000,000 | 30,000,000 |
| LS   | 810,000    | 810,000    | 810,000    |
| TOTAL  | 75,250,000 | 75,250,000 | 75,250,000 |
| <b>COINCIDENT KW BY RATE CLASS</b>                 |            |            |            |
| Large Power Service Secondary LPSS                 | 10,000     | 10,000     | 10,000     |
| Large Power Service Secondary Coincident LPSS COIN | 20,000     | 20,000     | 20,000     |
| Large Power Service Primary LPSP                   | 0          | 0          | 0          |
| Large Power Service Primary Coincident LPSP COIN   | 25,000     | 25,000     | 25,000     |
| Industrial Service Secondary ISS                   | 0          | 0          | 0          |
| Industrial Service Secondary Coincident ISS COIN   | 0          | 0          | 0          |
| Industrial Service Primary ISP                     | 13,000     | 13,000     | 13,000     |
| Industrial Service Primary Coincident ISP COIN     | 9,000      | 9,000      | 9,000      |
| Transmission Service TS                            | 0          | 0          | 0          |
| Transmission Service Coincident TS COIN            | 0          | 0          | 0          |
| TOTAL  | 77,000     | 77,000     | 77,000     |
| <b>COINCIDENT KW BY RATE CATEGORY</b>              |            |            |            |
| LPSS, LPSP, ISS, ISP & TS                          | 23,000     | 23,000     | 23,000     |
| LPSS, LPSP, ISS, ISP & TS COIN                     | 54,000     | 54,000     | 54,000     |
| TOTAL  | 77,000     | 77,000     | 77,000     |
| <b>KVA SALES BY RATE CLASS</b>                     |            |            |            |
| Large Power Service Secondary LPSS                 | 12,500     | 12,500     | 12,500     |
| Large Power Service Primary LPSP                   | 0          | 0          | 0          |
| Industrial Service Secondary ISS                   | 0          | 0          | 0          |
| Industrial Service Primary ISP                     | 15,500     | 15,500     | 15,500     |
| Transmission Service TS                            | 0          | 0          | 0          |
| LPSS, LPSP, ISS, ISP & TS                          | 28,000     | 28,000     | 28,000     |
| <b>KW SALES BY RATE CLASS</b>                      |            |            |            |
| General Power Service GPS                          | 38,000     | 38,000     | 38,000     |
| General Electric Heating GEH                       | 900        | 900        | 900        |
| TOTAL GPS & GEH                                    | 38,900     | 38,900     | 38,900     |

| CAPACITY COST REPORT                     |  | July<br>2018       | August<br>2018     | September<br>2018  |
|--|--|--------------------|--------------------|--------------------|
| UNIT FIXED COSTS                         |  |                    |                    |                    |
| Acct No.                                 |  |                    |                    |                    |
| 500                                      | Supv and Engr - Operation                      | 0.00               | 0.00               | 0.00               |
| 502                                      | Steam Expenses                                 | 0.00               | 0.00               | 0.00               |
| 505                                      | Electric Expenses                              | 0.00               | 0.00               | 0.00               |
| 506                                      | Misc Steam Power Expenses                      | 0.00               | 0.00               | 0.00               |
| 511                                      | Maint of Structures                            | 0.00               | 0.00               | 0.00               |
|  | Payroll Taxes                                  | <u>0.00</u>        | <u>0.00</u>        | <u>0.00</u>        |
| <b>(A)</b>                               | <b>TOTAL UNIT FIXED COSTS</b>                  | <b>0.00</b>        | <b>0.00</b>        | <b>0.00</b>        |
| UNIT VARIABLE COSTS                      |  |                    |                    |                    |
| 509                                      | SO2 Allowances                                 | 0.00               | 0.00               | 0.00               |
| 509.1                                    | NOX Allowances                                 | 0.00               | 0.00               | 0.00               |
| 510                                      | Supv and Engr - Maint                          | 0.00               | 0.00               | 0.00               |
| 512                                      | Maint of Boiler Plant                          | 0.00               | 0.00               | 0.00               |
| 513                                      | Maint of Electric Plant                        | 0.00               | 0.00               | 0.00               |
| 514                                      | Misc Steam Plant Expenses                      | <u>0.00</u>        | <u>0.00</u>        | <u>0.00</u>        |
| <b>(B)</b>                               | <b>TOTAL UNIT VARIABLE COSTS</b>               | <b><u>0.00</u></b> | <b><u>0.00</u></b> | <b><u>0.00</u></b> |
| <b>TOTAL PRODUCTION COST</b>             |  | <b>0.00</b>        | <b>0.00</b>        | <b>0.00</b>        |
| ADMN.& GENERAL COSTS(PRODUCTION RELATED) |  |                    |                    |                    |
| 920                                      | Admn and general salaries                      | 92,139.43          | 111,685.29         | 108,932.97         |
| 921                                      | Office supplies and expense                    | 20,013.52          | 17,573.76          | 22,015.99          |
| 923                                      | Outside services employed                      | 5,491.28           | (337,742.93)       | 5,443.13           |
| 925                                      | Injuries and damages                           | 80,090.09          | (24,510.51)        | 27,754.05          |
| 926                                      | Employee pension and benefits                  | 291,991.07         | 325,061.06         | 302,708.84         |
| 928                                      | Regulatory commission expenses                 | 13,998.60          | 0.00               | 0.00               |
| 930                                      | Misc general expense                           | 268.60             | 947.70             | 0.00               |
| 931                                      | Rents  | 0.00               | 0.00               | 0.00               |
| 932                                      | Maint of general plant                         | 29,599.32          | 18,209.54          | 22,879.54          |
| 933                                      | Transportation                                 | 5,872.86           | 4,299.06           | 4,276.53           |
|  | Payroll taxes                                  | <u>9,677.69</u>    | <u>10,199.09</u>   | <u>10,069.05</u>   |
| TOTAL ADMN AND GENERAL EXPENSES          |  | 549,142.46         | 125,722.06         | 504,080.10         |
| PRR=                                     |  | <u>0.000000</u>    | <u>0.000000</u>    | <u>0.000000</u>    |
| <b>(C)</b>                               | <b>PRODUCTION RELATED ADMN/GEN. EXPENSE</b>    | <b>0.00</b>        | <b>0.00</b>        | <b>0.00</b>        |
| <b>(D)</b>                               | <b>PLANT INSURANCE</b>                         | <b>0.00</b>        | <b>0.00</b>        | <b>0.00</b>        |
| <b>(E)</b>                               | <b>DEBT SERVICE</b>                            | <b>0.00</b>        | <b>0.00</b>        | <b>0.00</b>        |
| AMORTIZATION AND INTEREST                |  |                    |                    |                    |
|  | Amortized capital                              | 0.00               | 0.00               | 0.00               |
|  | Interest on capital                            | <u>0.00</u>        | <u>0.00</u>        | <u>0.00</u>        |
|  | Amortized Expenses on Unit #1 Scheduled Outage | 0.00               | 0.00               | 0.00               |
|  | Interest on Expenses                           | <u>0.00</u>        | <u>0.00</u>        | <u>0.00</u>        |
| <b>(F)</b>                               | <b><u>Total amortization</u></b>               | <b><u>0.00</u></b> | <b><u>0.00</u></b> | <b><u>0.00</u></b> |
| <b>(G)</b>                               | <b>TOTAL MEMBER PRODUCTION COSTS</b>           | <b>0.00</b>        | <b>0.00</b>        | <b>0.00</b>        |

CITY OF RICHMOND, INDIANA

ECA EXHIBIT V

DETERMINATION OF DEMAND RELATED AND ENERGY RELATED  
COSTS INCLUDED IN TRACKING FACTOR EFFECTIVE PRIOR TO JANUARY 27, 1983

| LINE<br>NO.<br>----- | DESCRIPTION<br>-----  | DEMAND RELATED<br>----- | ENERGY RELATED<br>----- | TOTAL<br>----- | LINE<br>NO.<br>----- |
|----------------------|---|-------------------------|-------------------------|----------------|----------------------|
|                      | WHOLESALE POWER COSTS TRACKER<br>-----  |                         |                         |                |                      |
| 1                    | FERC DOCKET NOS. ER78-381 AND ER81-48<br>FILING DATED JULY 15, 1981.  | (\$0.000241)            | (\$0.000025)            | (\$0.000266)   | 1                    |
| 2                    | FERC DOCKET NO. ER82-555-000<br>FILING DATED AUGUST 3, 1982   | \$0.001857              | (\$0.000192)            | \$0.001665     | 2                    |
| 3                    | FERC DOCKET NO. ER82-555-000<br>FILING DATED NOVEMBER 18, 1982  | \$0.001483              | \$0.000000              | \$0.001483     | 3                    |
| 4                    | FERC DOCKET NO. ER82-555-000<br>FILING DATED JANUARY 3, 1983  | (\$0.000964)            | \$0.000130              | (\$0.000834)   | 4                    |
| 5                    | TOTAL WHOLESALE POWER COST TRACKER PER KWH -<br>APPENDIX B, LINE 8 OF TRACKING FACTOR<br>APPROVED ON JANUARY 27, 1983       | \$0.002135              | (\$0.000087)            | \$0.002048     | 5                    |
| 6                    | AVERAGE WEIGHTED FUEL COST CHARGE BILLED<br>PER KWH - APPENDIX B, LINE 7 OF TRACKING<br>FACTOR APPROVED ON JANUARY 27, 1983 | \$0.000000              | \$0.003597              | \$0.003597     | 6                    |
| 7                    | TOTAL PRESENT TRACKING FACTOR   | \$0.002135              | \$0.003510              | \$0.005645     | 7                    |

CITY OF RICHMOND  
RICHMOND POWER & LIGHT

ECA EXHIBIT V-A

DETERMINATION OF NET CAPACITY PURCHASE PAYMENTS  
TWELVE MONTH PERIOD ENDED OCTOBER 31, 1982

| LINE<br>NO.<br>----- | DESCRIPTION<br>-----  |                   | LINE<br>NO.<br>----- |
|----------------------|---|-------------------|----------------------|
|                      | PRODUCTION *  |                   |                      |
| 1                    | FUEL  | \$8,913,320.89    | 1                    |
| 2                    | ALL OTHER PRODUCTION  | \$0.00            | 2                    |
| 3                    | OPERATING & MAINTENANCE   | \$1,921,600.89    | 3                    |
| 4                    | TOTAL PRODUCTION  | \$10,834,921.78   | 4                    |
| 5                    | ADMINISTRATIVE & GENERAL  | \$505,382.69      | 5                    |
| 6                    | PAYROLL RELATED TAXES   | \$137,502.45      | 6                    |
| 7                    | CONTRIBUTION IN LIEU OF PROPERTY TAXES  | \$270,350.99      | 7                    |
|                      | DEPRECIATION  |                   |                      |
| 8                    | PRODUCTION FACILITIES   | \$838,266.48      | 8                    |
| 9                    | GENERAL PLANT   | \$25,858.39       | 9                    |
| 10                   | TOTAL DEPRECIATION  | \$864,124.87      | 10                   |
| 11                   | TOTAL OPRATING REVENUE DEDUCTIONS   | \$12,612,282.78   | 11                   |
| 12                   | PROVISION FOR DEBT SERVICE  | \$822,366.00      | 12                   |
| 13                   | TOTAL COST  | \$13,434,648.78   | 13                   |
|                      | CAPACITY PURCHASE PAYMENTS  |                   |                      |
| 14                   | CAPACITY PAYMENT **<br>\$4.29 KW - MONTH X 93,400 KW X 12 MONTHS  | \$4,808,232.00    | 14                   |
| 15                   | FUEL PAYMENT<br>\$.020093 KWH X 443,603,289 KWH   | \$8,913,320.89    | 15                   |
| 16                   | TOTAL PAYMENT   | \$13,721,552.89   | 16                   |
| 17                   | LESS TOTAL COST   | (\$13,434,648.78) | 17                   |
| 18                   | TOTAL NET PAYMENT   | \$286,904.11      | 18                   |
|                      | \$13,434,648.78<br>(\$8,913,320.89)<br>-----<br>(\$ 4,521,327.89 / 12 = \$376,777.32 EXHIBIT II LINE 2) |                   |                      |
|                      | (\$4,802,232 / 12 = \$400,686.00 EXHIBIT II LINE 5)   |                   |                      |

\* PRODUCTION EXPENSES FROM PAGE 1 OF NOTE A JANUARY 25, 1983 FILING

\*\* CHANGED FROM \$4.94 OF PREVIOUS FILING TO \$4.29

Testimony of L. Tomczyk  
Petitioner's Exhibit 2

General Inputs

Trackers for **CITY OF RICHMOND, INDIANA**

|                         |                  |
|-------------------------|------------------|
| Name of Utility:        |                  |
| Location:               |                  |
| Richmond, Indiana 47374 | 1st Quarter 2021 |

Enter data only in cells with yellow shading.  
Please date entries where requested.

|  |        |        |        |
|--|--------|--------|--------|
| Initial month for the projected period | Jan-21 | Feb-21 | Mar-21 |
| Historical period for this analysis    | Jul-20 | Aug-20 | Sep-20 |

|  |                 |                    |         |
|--|-----------------|--------------------|---------|
| IMPA rate for the period covered by this analysis: |                 | Entered: 11/1/2020 |         |
| Effective for:                                     | 1/1/2021        |                    |         |
|  | Demand<br>\$/kW | Energy<br>\$/kWh   |         |
| Base Production                                    | \$ 22.785       | \$ 0.026608        |         |
| Delivery Voltage                                   | \$ -            |                    |         |
| Total  | \$ 22.785       | \$ 0.026608        |         |
| Budgeted Generation Costs for 2021                 | \$ -            | \$ -               | Average |
| Capacity Payment (Annual)                          | \$ -            | \$ -               | Average |

|                                    |                 |                    |  |
|------------------------------------|-----------------|--------------------|--|
| Rate effective for the BASE period |                 | Entered: 11/1/2020 |  |
| effective for                      | 2019 TY         |                    |  |
|                                    | Demand<br>\$/kW | Energy<br>\$/kWh   |  |
| Base Production                    | 22.785          | 0.026608           |  |
| Delivery Voltage                   |                 |                    |  |
| ECA                                | 22.785          | 0.026608           |  |

|                                      |                                      |                                       |  |
|--------------------------------------|--------------------------------------|---------------------------------------|--|
| Generation Costs & Capacity Payments |                                      | Entered: 11/1/2020                    |  |
| From most recent Electric Rate Study |                                      |                                       |  |
|                                      | Generation<br>Costs in<br>Base Rates | Capacity<br>Payments in<br>Base Rates |  |
| Inc Change Base Rate                 | \$ -                                 | \$ -                                  |  |

|                                     |                    |                     |            |
|-------------------------------------|--------------------|---------------------|------------|
| Data from IMPA                      |                    | Entered: 11/1/2020  |            |
| Estimated Purchased Power from IMPA |                    |                     |            |
|                                     | Jan-21             | Feb-21              | Mar-21     |
|                                     | 142,000            | 142,000             | 142,000    |
| Total Billing Determinants          | 426,000 kW         |                     |            |
|                                     | Jan-21             | Feb-21              | Mar-21     |
|                                     | 78,019,081         | 78,019,081          | 78,019,081 |
|                                     | 234,057,244 kWh    |                     |            |
|                                     | Demand ECA - \$/kW | Energy ECA - \$/kWh |            |
| IMPA ECA                            | \$0.000            | \$0.000             | \$0.000    |
|                                     | \$0.000000         | \$0.000000          | \$0.000000 |

|                                   |            |                    |            |
|-----------------------------------|------------|--------------------|------------|
| Data from IMPA's Bills            |            | Entered: 11/1/2020 |            |
| Month of Service                  | Jul-20     | Aug-20             | Sep-20     |
| Demand (kW)                       | 142,000    | 142,000            | 142,000    |
| Energy (kWh)                      | 78,019,081 | 78,019,081         | 78,019,081 |
| Energy Cost Adjustment (ECA)      |            |                    |            |
| Demand, \$/kW                     | \$0.000    | \$0.000            | \$0.000    |
| Energy, \$/kWh                    | \$0.000000 | \$0.000000         | \$0.000000 |
| Capacity Payments Less Fuel Costs | \$ -       | \$ -               | \$ -       |

|                               |            |
|-------------------------------|------------|
| Total<br>Billing Determinants |            |
| Sum                           | Average    |
| 426,000                       | 142,000    |
| 234,057,244                   | 78,019,081 |

|  |                            |                             |        |
|--|----------------------------|-----------------------------|--------|
| Incremental Change in Base Rate          |                            | Entered: 11/1/2020          |        |
| from Attachment "A", page 1 of 3, line 1 |                            |                             |        |
| for the months of:                       |                            |                             |        |
|  | Jul-20                     | Aug-20                      | Sep-20 |
|  | Demand<br>Related<br>\$/kW | Energy<br>Related<br>\$/kWh |        |
| Incremental Change<br>in Base Rates      | 0.000                      | 0.000000                    |        |

| Code                           | Name/Description   | Demand billed<br>on basis of<br>Coincident Pk?<br>("1" = yes, "0" = no) | Is Demand<br>billed on<br>NCP Peak? | Is delivery at<br>transmission volt | Is this a<br>flat rate? | Does a<br>Tracker apply<br>to this rate? |
|--------------------------------|--|---|-------------------------------------|-------------------------------------|-------------------------|--|
| R                              | Residential Electric Service   |   |                                     |                                     |                         | 1  |
| CL                             | Commercial Lighting Service  |   |                                     |                                     |                         | 1  |
| EHS                            | Electric Heating Schools Services                                    |   |                                     |                                     |                         | 1  |
| GPS & GEH                      | Gen Power & Gen Electric Heat  |   | 1                                   |                                     |                         | 1  |
| LPSS, LPSP, ISS, ISP & TS      | Large Power Service, Industrial Service & Transmission Service       |   | 1                                   |                                     |                         | 1  |
| LPSS, LPSP, ISS, ISP & TS COIN | Large Power Service, Industrial Service & Transmission Service Coinc | 1   |                                     |                                     |                         | 1  |
| LS                             | Outdoor Lighting, Street Lighting                                    |   |                                     |                                     | 1                       | 1  |

Testimony of L. Tomczyk  
Petitioner's Exhibit 2

General Inputs

Trackers for **CITY OF RICHMOND, INDIANA**

| Adjustment Factors (per kWh)  |                                |  | Entered: 11/1/2020  |  |  |
|---|--------------------------------|--|---|--|--|
| Copy from Attachment A, Page 3 of 3, of Tracker calculation for the billing periods of: |                                |  |   |  |  |
|   |                                |  | Jul-20  | Aug-20   | Sep-20   |
|   | <u>Code</u>                    | <u>Name/Description</u>  | <u>Factor per kVA/kW</u><br>Demand<br>(Copy from<br>Column E) | <u>Factor per kWh</u><br>Demand<br>(copy from<br>Column F) | <u>Factor per kWh</u><br>Energy<br>(copy from<br>Column G) |
| 1   | R                              | Residential Electric Service   | 0.000000  | 0.000000   | 0.000000   |
| 2   | CL                             | Commercial Lighting Service  | 0.000000  | 0.000000   | 0.000000   |
| 3   | EHS                            | Electric Heating Schools Services                                    | 0.000000  | 0.000000   | 0.000000   |
| 4   | GPS & GEH                      | Gen Power & Gen Electric Heat  | 0.000000  | 0.000000   | 0.000000   |
| 5   | LPSS, LPSP, ISS, ISP & TS      | Large Power Service, Industrial Service & Transmission Service       | 0.000000  | 0.000000   | 0.000000   |
| 6   | LPSS, LPSP, ISS, ISP & TS COIN | Large Power Service, Industrial Service & Transmission Service Coinc | 0.000000  | 0.000000   | 0.000000   |
| 7   | LS                             | Outdoor Lighting, Street Lighting                                    | 0.000000  | 0.000000   | 0.000000   |
| 8   | 0                              | 0  | 0.000000  | 0.000000   | 0.000000   |
| 9   | 0                              | 0  | 0.000000  | 0.000000   | 0.000000   |
| 10  | 0                              | 0  | 0.000000  | 0.000000   | 0.000000   |

| <u>Allocation Factors</u>      |  | Entered:                    |                              | 11/1/2020 |
|--------------------------------|--|-----------------------------|------------------------------|-----------|
| from 2020 Rate Study           |  |                             |                              |           |
| <u>Code</u>                    | <u>Name/Description</u>                            | kW Demand<br><u>Factors</u> | kWh Energy<br><u>Factors</u> |           |
| R                              | Residential Electric Service                       | 25.912%                     | 21.087%                      |           |
| CL                             | Commercial Lighting Service                        | 4.796%                      | 3.964%                       |           |
| EHS                            | Electric Heating Schools Services                  | 0.052%                      | 0.055%                       |           |
| GPS & GEH                      | Gen Power & Gen Electric Heat                      | 15.645%                     | 15.277%                      |           |
| LPSS, LPSP, ISS, ISP & TS      | Large Power Service, Industrial Service & Transmis | 16.955%                     | 19.088%                      |           |
| LPSS, LPSP, ISS, ISP & TS COIN | Large Power Service, Industrial Service & Transmis | 36.202%                     | 39.435%                      |           |
| LS                             | Outdoor Lighting, Street Lighting                  | 0.438%                      | 1.094%                       |           |
| 0                              | 0  |                             |                              |           |
| 0                              | 0  |                             |                              |           |
| 0                              | 0  |                             |                              |           |
|                                |  | 100.000%                    | 100.000%                     |           |

| Indiana Utility Receipts Tax |        |
|------------------------------|--------|
| Tax Rate                     | 1.40%  |
| Tax Factor                   | 0.9860 |

| Entered: 11/1/2020        |       |
|---------------------------|-------|
| Distribution Loss Factor: | 3.55% |

| Ratio of CP/Billed Demand |        |
|---------------------------|--------|
| GPS & GEH                 | 57.30% |
| LPSS, LPSP, ISS, ISP & TS | 82.13% |

| Data for Loss Calculation |              |             | Entered: | 11/1/2020 |
|---------------------------|--------------|-------------|----------|-----------|
| update annually           |              |             |          |           |
| Calendar                  |              |             |          |           |
| Year of                   |              | Purchased   |          | Line      |
| TY 2019                   | Retail Sales | Power       |          | Loss      |
| January                   | 75,250,000   | 78,019,081  |          | 3.55%     |
| February                  | 75,250,000   | 78,019,081  |          | 3.55%     |
| March                     | 75,250,000   | 78,019,081  |          | 3.55%     |
| April                     | 75,250,000   | 78,019,081  |          | 3.55%     |
| May                       | 75,250,000   | 78,019,081  |          | 3.55%     |
| June                      | 75,250,000   | 78,019,081  |          | 3.55%     |
| July                      | 75,250,000   | 78,019,081  |          | 3.55%     |
| August                    | 75,250,000   | 78,019,081  |          | 3.55%     |
| September                 | 75,250,000   | 78,019,081  |          | 3.55%     |
| October                   | 75,250,000   | 78,019,081  |          | 3.55%     |
| November                  | 75,250,000   | 78,019,081  |          | 3.55%     |
| December                  | 75,250,000   | 78,019,081  |          | 3.55%     |
| Total                     | 903,000,000  | 936,228,975 |          | 3.55%     |

| Previous Variance  |  |        | Entered: |                 | 11/1/2020       |
|--|--|--------|----------|-----------------|-----------------|
| copy from Exhibit IV, Page 4 of 8 of Tracker calculations for the billing periods of |  |        |          |                 |                 |
|  | Jul-20   | Aug-20 | Sep-20   |                 |                 |
| This is the Reconciliation of Variances for the months of:                           |  |        |          |                 |                 |
|  | Jan-20   | Feb-20 | Mar-20   | Demand          | Energy          |
|  |  |        |          | (copy from      | (copy from      |
| <u>Code</u>  | <u>Name/Description</u>                          |        |          | <u>Column D</u> | <u>Column E</u> |
| R  | Residential Electric Service                     |        |          | \$0.00          | \$0.00          |
| CL   | Commercial Lighting Service                      |        |          | \$0.00          | \$0.00          |
| EHS  | Electric Heating Schools Services                |        |          | \$0.00          | \$0.00          |
| GPS & GEH  | Gen Power & Gen Electric Heat                    |        |          | \$0.00          | \$0.00          |
| LPSS, LPSP, ISS, ISP & TS  | Large Power Service, Industrial Service & Transr |        |          | \$0.00          | \$0.00          |
| LPSS, LPSP, ISS, ISP & TS COIN   | Large Power Service, Industrial Service & Transr |        |          | \$0.00          | \$0.00          |
| LS   | Outdoor Lighting, Street Lighting                |        |          | \$0.00          | \$0.00          |
| 0  | 0  |        |          |                 |                 |
|  |  |        |          | \$0.00          | \$0.00          |

Testimony of L. Tomczyk  
Petitioner's Exhibit 2

General Inputs

Trackers for CITY OF RICHMOND, INDIANA

| Energy Sales by Rate Tariff<br>for latest complete calendar year<br>(from utility documents) |             | 11/1/2020<br>Update Quarterly |                |                |                |                |                |                |                |                |                 |                 |                 | Total       |
|--|-------------|-------------------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|-----------------|-----------------|-----------------|-------------|
| Code   | Days in Mo. | Jan-20<br>31                  | 2/1/2020<br>29 | 3/1/2020<br>31 | 4/1/2020<br>30 | 5/1/2020<br>31 | 6/1/2020<br>30 | 7/1/2020<br>31 | 8/1/2020<br>31 | 9/1/2020<br>30 | 10/1/2020<br>31 | 11/1/2020<br>30 | 12/1/2020<br>31 |             |
| R  |             | 15,600,000                    | 15,600,000     | 15,600,000     | 15,600,000     | 15,600,000     | 15,600,000     | 15,600,000     | 15,600,000     | 15,600,000     | 15,600,000      | 15,600,000      | 15,600,000      | 187,200,000 |
| CL   |             | 3,000,000                     | 3,000,000      | 3,000,000      | 3,000,000      | 3,000,000      | 3,000,000      | 3,000,000      | 3,000,000      | 3,000,000      | 3,000,000       | 3,000,000       | 3,000,000       | 36,000,000  |
| EHS  |             | 40,000                        | 40,000         | 40,000         | 40,000         | 40,000         | 40,000         | 40,000         | 40,000         | 40,000         | 40,000          | 40,000          | 40,000          | 480,000     |
| GPS & GEH  |             | 11,300,000                    | 11,300,000     | 11,300,000     | 11,300,000     | 11,300,000     | 11,300,000     | 11,300,000     | 11,300,000     | 11,300,000     | 11,300,000      | 11,300,000      | 11,300,000      | 135,600,000 |
| LPSS, LPSP, ISS, ISP & TS  |             | 14,500,000                    | 14,500,000     | 14,500,000     | 14,500,000     | 14,500,000     | 14,500,000     | 14,500,000     | 14,500,000     | 14,500,000     | 14,500,000      | 14,500,000      | 14,500,000      | 174,000,000 |
| LPSS, LPSP, ISS, ISP & TS COIN   |             | 30,000,000                    | 30,000,000     | 30,000,000     | 30,000,000     | 30,000,000     | 30,000,000     | 30,000,000     | 30,000,000     | 30,000,000     | 30,000,000      | 30,000,000      | 30,000,000      | 360,000,000 |
| LS   |             | 810,000                       | 810,000        | 810,000        | 810,000        | 810,000        | 810,000        | 810,000        | 810,000        | 810,000        | 810,000         | 810,000         | 810,000         | 9,720,000   |
| 0  |             |                               |                |                |                |                |                |                |                |                |                 |                 |                 | 0           |
| 0  |             |                               |                |                |                |                |                |                |                |                |                 |                 |                 | 0           |
| 0  |             |                               |                |                |                |                |                |                |                |                |                 |                 |                 | 0           |
| Total Retail Sales (kWh)   |             | 75,250,000                    | 75,250,000     | 75,250,000     | 75,250,000     | 75,250,000     | 75,250,000     | 75,250,000     | 75,250,000     | 75,250,000     | 75,250,000      | 75,250,000      | 75,250,000      | 903,000,000 |
| Wholesale Purchases (kWh)  |             | 78,019,081                    | 78,019,081     | 78,019,081     | 78,019,081     | 78,019,081     | 78,019,081     | 78,019,081     | 78,019,081     | 78,019,081     | 78,019,081      | 78,019,081      | 78,019,081      | 936,228,975 |
| Distribution Losses  |             | 3.55%                         | 3.55%          | 3.55%          | 3.55%          | 3.55%          | 3.55%          | 3.55%          | 3.55%          | 3.55%          | 3.55%           | 3.55%           | 3.55%           | 3.55%       |

Previous Quarter ECA Information:

|            |          |         |
|------------|----------|---------|
| R          | 0.000000 | per KWH |
| CL         | 0.000000 | per KWH |
| EHS        | 0.000000 | per KWH |
| GP and GEH | 0.000000 | per KW  |
| LPSS       | 0.000000 | per KWH |
|            | 0.000000 | per KVA |
| LPSS COIN  | 0.000000 | per KWH |
|            | 0.000000 | per KW  |
| LPSP       | 0.000000 | per KWH |
|            | 0.000000 | per KVA |
| LPSP COIN  | 0.000000 | per KWH |
|            | 0.000000 | per KW  |
| ISS        | 0.000000 | per KWH |
|            | 0.000000 | per KVA |
| ISS COIN   | 0.000000 | per KWH |
|            | 0.000000 | per KW  |
| ISP        | 0.000000 | per KWH |
|            | 0.000000 | per KVA |
| ISP COIN   | 0.000000 | per KWH |
|            | 0.000000 | per KW  |
| LS         | 0.000000 | per KWH |
| TS         | 0.000000 | per KVA |
|            | 0.000000 | per KWH |
| TS COIN    | 0.000000 | per KW  |
|            | 0.000000 | per KWH |

Page 3 of 3 Column H Total:

0.000000