LINDA LINGLE
GOVERNOR

JAMES R. AIONA, JR.
LT. GOVERNOR

MARK E. RECKTENWALD
DIRECTOR

JOHN E. COLE
EXECUTIVE DIRECTOR

CC
WK
JK
✓BKK
Kn/cpa
NS
Rvd
JM
LYK
SI/CL

STATE OF HAWAII
DIVISION OF CONSUMER ADVOCACY
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS
335 MERCHANT STREET, ROOM 326
P.O. Box 541
HONOLULU, HAWAII 96809
Phone Number: 586-2800
Fax Number: 586-2780
www.hawaii.gov/dcca/dca

July 18, 2005

FILED
2005 JUL 18 P 3: 56
PUBLIC UTILITIES COMMISSION

The Honorable Chairman and Members of
the Hawaii Public Utilities Commission
Kekuanaoa Building
465 South King Street, 1st Floor
Honolulu, Hawaii 96813

Dear Commissioners:

RE: Docket No. 04-0113 -- Application of Hawaiian Electric Company, Inc. for Approval of Rate Increases and Revised Rate Schedules and Rules.

The attachments to HECO/CA-IR-101, HECO/CA-IR-204, HECO/CA-IR-302, HECO/CA-IR-304, HECO/CA-IR-511, and HECO/CA-IR-512 are voluminous. As a result, the Division of Consumer Advocacy ("Consumer Advocate") is submitting one copy to each of the parties in the instant proceeding. See docket file

Sincerely yours,

Cheryl S. Kikuta

Cheryl S. Kikuta
Utilities Administrator

CSK:at
Enclosure

c: William A. Bonnet(w/enclosure)
Darcy Endo-Omoto (w/out enclosure)
Thomas W. Williams, Jr., Esq. (w/out enclosure)
Dr. Kay Davoodi (w/out enclosure)
Randall Y.K. Young (w/enclosure)

FILED
2005 JUL 18 P 3: 58
PUBLIC UTILITIES
COMMISSION

PSI Energy, Inc.

Non Fuel Production Plant O&M Annual Comparison

O&M Costs	Cause No. 42359 Pro Forma Level Sept 30, 2002	Sept 30, 2002	2001	2000
Steam				
Operation		490,664	484,423	477,348
Fuel		425,978	415,935	410,160
Operation less fuel		64,686	68,488	67,188
Maintenance		60,157	54,729	54,734
Total Steam	**121,086**	**124,843**	**123,217**	**121,922**
Hydraulic				
Operation		390	376	386
Maintenance		537	523	568
Total Hydro	**927**	**927**	**899**	**954**
Other Power Production				
Operation		31,587	29,793	42,714
Fuel		29,379	27,532	30,016
Operation less fuel		2,208	2,261	12,698
Maintenance		1,628	2,831	3,456
Total Other Power	**5,792**	**3,836**	**5,092**	**16,154**
Total Non Fuel O&M	**127,805**	**129,606**	**129,208**	**139,030**

TY Proposed vs. History

Notes:
1) September 30, 2002 amounts see MSFR 170 IAC 1 - 5 - 8 (8) Schedule C-2 Page 2,3,4 of 13
2001 & 2000 See FERC Form 1 pages 320 & 321
2) Pro Forma Cause No. 42359 level is per book September 30, 2002 plus the following pro formas

Steam		
O&M Off-Sytem Sales	(4,008)	Sch C 3.3 pg. 2
Nox Additions	1,363	Sch C 3.34
Amort. Phase II Compl	625	Sch C 3.43
Edwardsport	(1,105)	Sch 3.30
Noblesville Repowering	(632)	Sch 3.30
Total	**(3,757)**	Sch 3.30
Other Production		
Madison and Henry	**1,956**	Sch 3.30

09603-024414

Generation O&M Δ

Madison
FY 06 submitted

MADISON EXPLANATIONS

Staffcount & actuals

(1)

We did not increase manning at Madison. Labor did not increase significantly between the 2002 station center budget and the 2003 station center budget. However, one thing to note, every station did see an increase in the labor loading rate:

	2002	2003
Exempt Employees	55.50%	64.50%
Union Employees	60.50%	71.50%

Fringe Benefits was the major driver of this increase.

(2)

MADISON			
OUTSIDE CENTERS			
1410 - Contract Labor	ARQ - Air Quality	$ 25,359.36	-----> labor $ to cover contract support by Lisa Rosner & labor $ for contractor support on CT MACT permit applications

MADISON				
STATION CENTERS				
1410 - Contract Labor				
MDP - MADISON CT PRODUCTION				
	Details			
MADBOR1 - Borescope Inspection Unit 1	$	4,000.00		
MADBOR2 - Borescope Inspection Unit 2	$	4,000.00		
MADBOR3 - Borescope Inspection Unit 3	$	4,000.00		
MADBOR4 - Borescope Inspection Unit 4	$	4,000.00		
MADBOR5 - Borescope Inspection Unit 5	$	4,000.00		
MADBOR6 - Borescope Inspection Unit 6	$	4,000.00		
MADBOR7 - Borescope Inspection Unit 7	$	4,000.00		
MADBOR8 - Borescope Inspection Unit 8	$	4,000.00	$	32,000.00
MADBREA - MAD Breaker Maint	$	12,000.00		

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MADCO2 - MAD CO2 for Fire Protection	$	4,000.00
MADCLEAN - Janitorial Services	$	8,499.84
MADCWMCH - Cooling Water Module Chemical	$	2,500.00
MADDCBAT - MAD DC Battery/UPS Maint	$	3,000.00
MADDELTV - Maintenance Support contract	$	10,000.00
MADDIESE - MAD Diesel Fire Pump Maint	$	3,000.00
MADDIGEN - MAD 1&2 Diesel Generator Main	$	6,000.00
MADDISP - Disposal of waste products	$	30,000.00
MADFIRE - MAD Fire Protection Maint	$	7,000.00
MADGASSM - Gas Samples	$	1,000.00
MADGCSR - Grass Cutting and Snow Removal	$	14,000.00
MADHVACS - HVAC Services	$	10,000.32
MADMARK5 - MAD Mark V	$	19,999.68
MADMOTOR - MAD Motor Maint	$	10,000.00
MADPESTC - Pest Control	$	1,500.48
MADPUMP - MAD Pump Maint	$	10,000.00
MADRATA - MADISON RATA TESTING	$	40,000.00
MADRUMKE - Garbage Services	$	2,000.00
MADSECUR - Security Services	$	25,000.32
MADSKY - MAD Skytrac Gator Maint etc	$	2,000.00
MADTRAIN - Madison Training	$	60,000.00
MADWDCTL - Weed Control	$	20,000.00
NOPROJ - DEFAULT PROJECT	$	24,000.00
Grand Total	$	357,500.64

Contract Labor

(3)

MADISON
STATION CENTERS
1500 - Other

09603-016725

MADAG - A&G CHARGES	$	49,999.68	overhead charges for services from CG&E Corp - remember budget was created before Madison was moved to PSI	
MADBCKFD - Backfeed Power	$	450,000.00	Electric bill for the year	
MADBOR1 - Borescope Inspection Unit 1	$	2,000.00		
MADBOR2 - Borescope Inspection Unit 2	$	2,000.00		
MADBOR3 - Borescope Inspection Unit 3	$	2,000.00		
MADBOR4 - Borescope Inspection Unit 4	$	2,000.00		
MADBOR5 - Borescope Inspection Unit 5	$	2,000.00		
MADBOR6 - Borescope Inspection Unit 6	$	2,000.00		
MADBOR7 - Borescope Inspection Unit 7	$	2,000.00		
MADBOR8 - Borescope Inspection Unit 8	$	2,000.00	$ 16,000.00	
MADBREA - MAD Breaker Maint	$	4,000.00		
MADCEMS - CEMS Gases	$	85,000.32		
MADCEMSA - MAD CEMS Agreement	$	13,126.00		
MADCMPWA - Compressor Wash	$	2,500.00		
MADCWMCH - Cooling Water Module Chemical	$	2,500.00		
MADDELTA - MAD Delta V Parts	$	19,999.68		
MADDEMIN - Demin Water Fees	$	90,000.00		
MADENVFE - Environmental Fees	$	1,993.04		
MADHVACS - HVAC Services	$	4,999.68		
MADINSUR - Madison Insurance	$	59,994.00		
MADMARK5 - MAD Mark V	$	19,999.68		
MADPIFEE - Madison PI Fees	$	16,294.00		
MADSUBST - SubStation Maintenance	$	20,000.00		
MADTRWTR - City of Trenton - Water	$	1,200.00		
NOPROJ - DEFAULT PROJECT	$	118,504.48	---------->	
Grand Total	$	976,110.56		

	$	73,881.60
COMBCMTCECORR - Maint - Corrective	$	73,881.60
COMBCYCL - COMBINED CYCLE & C.T. Total	$	9,031.68
STSPRT CLERADM - Clerical & Administrative	$	22,111.68
COMMEQUP - Communications Equipment-EC	$	5,331.76
CPTHWSW - Computer Hardware & Software For EA	$	2,573.04
ITSUPPRT - IT Support	$	4,477.44

other

09603-016726

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OFFICSUP - Office Supplies & Expenses	$	1,097.28
PAGRCELL - Pagers/Cell Phones	$	44,622.88
STSPRTOP - STATION SUPPORT OTH PWR GEN Total	$	118,504.48
Grand Total		

OUTSIDE CENTERS
1500 - Other

1500 - Other	107 - Safety & Health Service	$	1,064.64	Employee expenses & the air permit for Madison
	174 - Engineering / Constructi	$	1,317.12	
	25W - Woodsdale Storeroom	$	942.72	
	ARQ - Air Quality	$	10,171.20	
	CBW - Cond Based Mtc / Perf	$	848.72	
	PSO - Power Trading Account:	$	11.52	
	TEF - E&C CT Fleet Team	$	480.00	
1500 - Other Total		$	14,835.92	

MISC - DETAIL OF OUTSIDE CENTERS IF NEEDED

MADISON	
OUTSIDE CENTERS	Outside centers budget to Madison for overall support of the plant

STRAIGHT TIME	107 - Safety & Health Service	$	4,991.20
	174 - Engineering / Constructi	$	13,986.08
	25W - Woodsdale Storeroom	$	15,568.48
	ARQ - Air Quality	$	29,068.96
	CBW - Cond Based Mtc / Perf	$	4,863.60

09603-016727

	PSO - Power Trading Account:	$ 1,689.04	
	TEF - E&C CT Fleet Team	$ 9,664.08	
STRAIGHT TIME Total		$ 79,831.44	
OVERTIME	107 - Safety & Health Service	$ 24.96	
	174 - Engineering / Constructi	$ 699.20	
	25W - Woodsdale Storeroom	$ 686.40	
	ARQ - Air Quality	$ 127.20	
	CBW - Cond Based Mtc / Perf	$ 203.76	
	TEF - E&C CT Fleet Team	$ 802.32	
OVERTIME Total		$ 2,543.84	
1410 - Contract Labor	ARQ - Air Quality	$ 25,359.36	labor out of air quality is sometimes contract labor
1410 - Contract Labor Total		$ 25,359.36	
1500 - Other	107 - Safety & Health Service	$ 1,064.64	Employee expenses & the air permit for Madison
	174 - Engineering / Constructi	$ 1,317.12	
	25W - Woodsdale Storeroom	$ 942.72	
	ARQ - Air Quality	$ 10,171.20	
	CBW - Cond Based Mtc / Perf	$ 848.72	
	PSO - Power Trading Account:	$ 11.52	
	TEF - E&C CT Fleet Team	$ 480.00	
1500 - Other Total		$ 14,835.92	
Grand Total		$ 122,570.56	

09603-016728

Henry County

HENRY COUNTY EXPLANATIONS

(1)

We did not increase manning at Henry County. Labor did not increase significantly between the 2002 station center budget and the 2003 station center budget. However, one thing to note, every station did see an increase in the labor loading rate:

	2002	2003
Exempt Employees	55.50%	64.50%
Union Employees	60.50%	71.50%

Fringe Benefits was the major driver of this increase.

(2)

HENRY COUNTY
OUTSIDE CENTERS

1410 - Contract Labor	ARQ - Air Quality	$	5,828.76	labor $ to cover contract support by Lisa Rosner (Lisa mostly support east side plants) & labor $ for contractor support on CT MACT permit applications

HENRY COUNTY
STATION CENTERS
1410 - Contract Labor

HCAIRCP - AIR COMPRESSOR IN:	$	1,000.00	
HCBORO - Borescope Inspection	$	22,749.00	
HCCHILL - Trane Chillers	$	15,000.00	
HCDISP - Disposal of Waste Prod	$	7,999.92	
HCFFIRED - FIRE PROTECTION D	$	5,000.00	
HCFIREP - FIRE PROTECTION IN	$	2,000.00	
HCGRNDS - Grounds work	$	30,000.00	
HCRATA - Rata Testing	$	15,000.00	
HCSUBST - Substation Maintenanc	$	19,999.92	
HCTRAIN - Henry County Training	$	9,999.96	
HCWINTER - Winterzation	$	10,000.00	
NOPROJ - DEFAULT PROJECT	$	76,499.76	
Grand Total	$	215,248.56	

09603-016729

COMBCYCL - CC MTCECORR - Maint - Corrective	$	34,999.92
MTCEPREV - Maint - Preventive	$	34,999.92

COMBCYCL - COMBINED CYCLE & C.T. Total	$	69,999.84
STSPRTOP - ST JANITORL - Janitorial	$	3,499.92
SECURITY - Security Guard Servi	$	3,000.00
STSPRTOP - STATION SUPPORT OTH PWR GEN	$	6,499.92
Grand Total	$	76,499.76

1200 - MATERIALS

HCCEMS - Cems Gases	ENVMNTOP - ENVIRONMENT	ENVROAIR - Env Ser	$	19,999.92
HCCEMS - Cems Gases Total			$	19,999.92
HCCMPWA - Compressor Washes	COMBCYCL - COMBINED CYCLI	MTCEPREV - Maint - I	$	3,000.00
HCCMPWA - Compressor Washes Total			$	3,000.00
NOPROJ - DEFAULT PROJECT	COMBCYCL - COMBINED CYCLI	MTCECORR - Maint -	$	4,999.92
		MTCEPREV - Maint - I	$	4,999.92
NOPROJ - DEFAULT PROJECT Total			$	9,999.84
Grand Total			$	32,999.76

(3)

HENRY COUNTY
STATION CENTERS
1500 - Other

HC03SEC - SECURITY ENHANCEM	$	5,000.00		
HCAGEXP - A&G Expenses	$	33,999.96	overhead charges for services from CG&E Corp - remember budget was created before HC was moved to PSI	
HCCHEM - Chemicals	$	20,000.00		
HCDEMIN - Mobile Demin. Trailers	$	250,000.00	water trailers needed to run units - demin water	
HCEQUIP - EQUIPMENT RENTAL	$	5,000.00		
HCMFILT - MISC. FILTERS	$	5,000.00		
HCNTGAS - NATURAL GAS	$	1,999.92		
HCPOWER - Backfeed Power	$	102,000.00	Electric bill for the year	

09603-016730

Amounts Eliminated for HC but not for Madison.

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HCTRAIN - Henry County Training	$	15,000.00
HCWINTER - Winterzation	$	5,000.00
NOPROJ - DEFAULT PROJECT	$	141,837.48
Grand Total	$	584,837.36

COMBCYCL - CC MTCECORR - Maint - Corrective	$	24,999.96	
MTCEPREV - Maint - Preventive	$	24,999.96	
COMBCYCL - COMBINED CYCLE & C.T. Total	$	49,999.92	
ENVMNTOP - E ENVROAIR - Env Services - Air	$	31,775.00	
ENVMNTOP - ENVIRONMENTAL OTH PWR GEN	$	31,775.00	
STSPRTOP - ST CLERADM - Clerical & Administra	$	28,884.00	$15K for general liability & auto insurance
COMMEQUP - Communications Eq	$	4,999.92	
CPTHWSW - Computer Hardware	$	8,413.92	
DONATENC - Donations - non Crp	$	999.96	
ITSUPPRT - IT Support	$	8,815.00	
OFFEQUIP - Office Equip Service	$	3,000.00	
OFFICSUP - Office Supplies & Ex	$	999.96	
PAGRCELL - Pagers/Cell Phones	$	2,499.96	
SAFESCVS - Safety Services	$	249.84	
UTILSCOM - Utilities - Co	$	1,200.00	
STSPRTOP - STATION SUPPORT OTH PWR GEN	$	60,062.56	
Grand Total	$	141,837.48	

09603-016731

MISC - DETAIL OF OUTSIDE CENTERS IF NEEDED

HENRY COUNTY	
OUTSIDE CENTERS	Outside centers budget to hc for overall support of the plant

STRAIGHT TIME	107 - Safety & Health Services	$	1,928.35
	25W - Woodsdale Storeroom	$	2,571.01
	ARQ - Air Quality	$	6,681.56
	PSO - Power Trading Accounts	$	1,688.71
	TEF - E&C CT Fleet Team	$	12,079.91

STRAIGHT TIME Total		$	24,949.54
OVERTIME	107 - Safety & Health Services	$	9.46
	25W - Woodsdale Storeroom	$	112.93
	ARQ - Air Quality	$	29.10
	TEF - E&C CT Fleet Team	$	1,002.66
OVERTIME Total		$	1,154.15
1410 - Contract Labor	ARQ - Air Quality	$	5,828.76
1410 - Contract Labor Total		$	5,828.76
1500 - Other	107 - Safety & Health Services	$	411.36
	25W - Woodsdale Storeroom	$	155.64
	ARQ - Air Quality	$	2,337.84
	PSO - Power Trading Accounts (	$	11.28
	TEF - E&C CT Fleet Team	$	600.00
1500 - Other Total		$	3,516.12
Grand Total		$	35,448.57

Employee expenses & the air permit for HC

09603-016732

Attachment OUCC 35-752-A

FRT - v 3.00.0060
9/15/03 3:33 pm

WorkCode_Descr	(All)
WorkCode	(All)
Work_Type_Des	(All)
Sys_Id_Descript	(All)
Report_to_Cente	(All)
Project_Descript	(All)
Project	(All)
Process_Id_Des	(All)
Corporation_Des	(All)
Corporation	(All)
Center_type	(All)
BusinessSegment	(All)
BusinessSegment	(All)
Activity_Descrip	(All)
Activity	(All)
ProcessID	(All)
Account_type	(All)
Center_Descripti	(All)
Accounting_Perio	2003
Account	(All)

HENRY COUNTY - 2003
AUG YTD

Actuals

Henry County Generating Station

Accounting_Perio	Resource	Center	Account_Description	$ and Units Amount	Quantity	Labor	Electric Bill	Non-Labor O&M Excluding Electric Bill
200301	1000	107	EMPLOYEE FRINGE BENEFITS	$94.38	0			
			Fringe Benefits - Non Utility	$94.38	0			
			Other Power - Oper Misc Exp	$135.32	8			
			PAYROLL TAXES	$18.64	0			
			PAYROLL TAXES - NONUTILI	$18.64	0			
		191	EMPLOYEE FRINGE BENEFITS	$106.27	0			
			Fringe Benefits - Non Utility	$106.28	0			
			Other Power - Oper Misc Exp	-$127.25	0			
			Other Power - Oper Sup & Eng	$279.72	4			
			PAYROLL TAXES	$20.94	0			
			PAYROLL TAXES - NONUTILI	$20.97	0			
		25W	EMPLOYEE FRINGE BENEFITS	$70.23	0			
			Fringe Benefits - Non Utility	$70.23	0			
			Other Power - Oper Misc Exp	$100.80	5			
			PAYROLL TAXES	$13.85	0			
			PAYROLL TAXES - NONUTILI	$13.85	0			
		265	Fringe Benefits - Non Utility	$1,597.88	0			
			Oth Pwr - Mtc Gen Elec Equip	$1,585.97	50			
			Other Power - Mtc Structures	$127.11	4			
			Other Power - Oper Gen Exp	$1,620.07	52			
			Other Power - Oper Misc Exp	$871.64	28			
			PAYROLL TAXES - NONUTILI	$315.23	0			
		267	Fringe Benefits - Non Utility	$860.87	0			
			Oth Pwr - Mtc Gen Elec Equip	$932.24	26			
			Other Power - Oper Gen Exp	$617.81	18			
			Other Power - Oper Misc Exp	$715.27	22			
			PAYROLL TAXES - NONUTILI	$169.88	0			
		2RP	EMPLOYEE FRINGE BENEFITS	$1,866.85	0			
			Fringe Benefits - Non Utility	$1,866.85	0			
			Other Power - Oper Sup & Eng	$2,677.45	132			
			PAYROLL TAXES	$368.41	0			
			PAYROLL TAXES - NONUTILI	$368.41	0			
		2RS	EMPLOYEE FRINGE BENEFITS	$700.90	0			
			Fringe Benefits - Non Utility	$700.93	0			
			Other Power - Oper Sup & Eng	$1,005.32	62			
			PAYROLL TAXES	$138.33	0			
			PAYROLL TAXES - NONUTILI	$138.34	0			
		PW1	EMPLOYEE FRINGE BENEFITS	$514.16	0			
			Fringe Benefits - Non Utility	$514.15	0			
			Other Power - Oper Misc Exp	$104.61	11			
			Other Power - Oper Sup & Eng	$632.88	22			
			PAYROLL TAXES	$101.44	0			
			PAYROLL TAXES - NONUTILI	$101.48	0			
	1000 Total			$22,251.73	444			
	1200	CDP	Oth Pwr - Mtc Gen Elec Equip	$503.19	0			
	1200 Total			$503.19	0			
	1410	ARQ	Other Power - Oper Misc Exp	$24.63	0			
	1410 Total			$24.63	0			
	1430	CDP	Oth Pwr - Mtc Gen Elec Equip	$541.28	0			
			Other Power - Mtc Structures	$30.00	0			
			Other Power - Oper Misc Exp	$307.94	0			
	1430 Total			$879.22	0			
	1460	2RP	Other Power - Oper Misc Exp	$60.39	0			
	1460 Total			$60.39	0			
	1470	107	Other Power - Oper Misc Exp	$134.60	0			
		2RP	Other Power - Oper Misc Exp	$608.40	0			
		2RS	Other Power - Oper Misc Exp	$62.73	0			
	1470 Total			$805.73	0			
	1480	25W	Oth Pwr - Mtc Gen Elec Equip	$105.17	0			
		CDP	Other Power - Oper Misc Exp	$11,870.02	0			
		CDZ	Other Power - Oper Misc Exp	$417.50	0			
	1480 Total			$12,392.69	0			
	1500	25W	Oth Pwr - Mtc Gen Elec Equip	-$84.33	0			
		CDP	Other Power - Oper Misc Exp	$676.16	0			
	1500 Total			$591.83	0			
200301 Total				$37,509.41	444	$22,251.73	$7,723.46	$7,534.22

Attachment OUCC 35-752-A

200302	1000	104	EMPLOYEE FRINGE BENEFITS	$468.56	0
			MISCELLANEOUS OTHER POW	-$280.53	0
			Other Power - Oper Misc Exp	$616.57	15
			PAYROLL TAXES	$46.24	0
			SOCIAL SECURITY TAXES	$46.24	0
		191	EMPLOYEE FRINGE BENEFITS	$169.63	0
			OPERATION SUPERVISION AI	-$101.57	0
			Other Power - Oper Sup & Eng	$223.33	3
			PAYROLL TAXES	$16.74	0
			SOCIAL SECURITY TAXES	$16.75	0
		230	EMPLOYEE FRINGE BENEFITS	$2,890.54	0
			OPERATION SUPERVISION AI	-$1,730.49	0
			Other Power - Oper Sup & Eng	$3,803.34	91
			PAYROLL TAXES	$285.22	0
			SOCIAL SECURITY TAXES	$285.22	0
		238	EMPLOYEE FRINGE BENEFITS	$298.74	0
			OPERATION SUPERVISION AI	-$178.84	0
			Other Power - Oper Sup & Eng	$393.06	9
			PAYROLL TAXES	$29.49	0
			SOCIAL SECURITY TAXES	$29.47	0
		25W	EMPLOYEE FRINGE BENEFITS	$153.96	0
			MISCELLANEOUS OTHER POW	-$92.18	0
			Other Power - Oper Misc Exp	$202.56	5
			PAYROLL TAXES	$15.20	0
			SOCIAL SECURITY TAXES	$15.20	0
		265	EMPLOYEE FRINGE BENEFITS	$1,912.03	0
			Fringe Benefits - Non Utility	$682.50	0
			GENERATION EXPENSES	$2,337.83	70
			MAINTENANCE OF GENERATI	$2,012.70	65
			MAINTENANCE OF STRUCTUR	$92.89	3
			MISCELLANEOUS OTHER POW	$588.33	19
			Oth Pwr - Mtc Gen Elec Equip	$1,114.74	36
			Other Power - Oper Gen Exp	$300.87	4
			Other Power - Oper Misc Exp	$380.49	8
			PAYROLL TAXES - NONUTILI	$134.68	0
			SOCIAL SECURITY TAXES	$377.30	0
		267	EMPLOYEE FRINGE BENEFITS	$1,320.79	0
			Fringe Benefits - Non Utility	$45.55	0
			GENERATION EXPENSES	$663.01	20
			MAINTENANCE OF GENERATI	$1,369.37	42
			MAINTENANCE OF STRUCTUR	$265.29	7
			MISCELLANEOUS OTHER POW	$1,178.31	36
			Other Power - Oper Gen Exp	$32.64	0
			Other Power - Oper Misc Exp	$87.14	0
			PAYROLL TAXES - NONUTILI	$8.99	0
			SOCIAL SECURITY TAXES	$260.51	0
		ARQ	EMPLOYEE FRINGE BENEFITS	$196.16	0
			MISCELLANEOUS OTHER POW	-$117.43	0
			Other Power - Oper Misc Exp	$258.11	6
			PAYROLL TAXES	$19.35	0
			SOCIAL SECURITY TAXES	$19.35	0
		PW1	EMPLOYEE FRINGE BENEFITS	$1,047.37	0
			MISCELLANEOUS OTHER POW	-$73.47	0
			OPERATION SUPERVISION AI	-$553.55	0
			Other Power - Oper Misc Exp	$161.52	9
			Other Power - Oper Sup & Eng	$1,216.47	20
			PAYROLL TAXES	$103.38	0
			SOCIAL SECURITY TAXES	$103.33	0
	1000 Total			$25,169.00	467
	1200	265	MAINTENANCE OF GENERATI	$12.22	0
	1200 Total			$12.22	0
	1410	ARQ	Other Power - Oper Misc Exp	$49.25	0
		PV8	MISC OTH PWR GE - SALARY &	$161.50	0
			MISCELLANEOUS OTHER POW	$242.25	0
	1410 Total			$453.00	0
	1430	CDP	MAINTENANCE OF GENERATI	$45.60	0
			MAINTENANCE OF STRUCTUR	$132.50	0
			MISCELLANEOUS OTHER POW	$808.56	0
			Oth Pwr - Mtc Gen Elec Equip	$338.67	0
	1430 Total			$1,325.33	0
	1440	PV8	MISC OTH PWR GE - SALARY &	$5.65	0
			MISCELLANEOUS OTHER POW	$8.48	0
	1440 Total			$14.13	0
	1460	2RP	MISCELLANEOUS OTHER POW	$15.00	0
			Other Power - Oper Misc Exp	$19.02	0
	1460 Total			$34.02	0
	1470	104	Other Power - Oper Misc Exp	$6.40	0
		230	Other Power - Oper Misc Exp	$280.80	0
		267	MISCELLANEOUS OTHER POW	$48.60	0
		2RP	MISCELLANEOUS OTHER POW	$270.57	0
			Other Power - Oper Misc Exp	$556.33	0
		2RS	Other Power - Oper Misc Exp	$33.07	0
		SNV	Employee Exp - A & G Other	-$812.86	0
	1470 Total			$382.91	0
	1480	230	Other Power - Oper Misc Exp	$782.00	0
		265	MISCELLANEOUS OTHER POW	$4,206.00	0
		CDP	MISCELLANEOUS OTHER POW	$186.28	0
			Other Power - Oper Misc Exp	$16,020.71	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
	1480 Total			$21,612.49	0
	1500	CDP	Other Power - Oper Misc Exp	$1,370.34	0
	1500 Total			$1,370.34	0

200302 Total				$50,373.44	467	$25,169.00	$7,017.81	$18,186.63
200303	1000	104	EMPLOYEE FRINGE BENEFITS	$577.06	0			
			MISCELLANEOUS OTHER POW	-$345.47	0			
			Other Power - Oper Misc Exp	$759.33	21			
			PAYROLL TAXES	$56.94	0			
			SOCIAL SECURITY TAXES	$56.94	0			
		191	EMPLOYEE FRINGE BENEFITS	$219.11	0			
			OPERATION SUPERVISION A	-$131.19	0			
			Other Power - Oper Sup & Eng	$288.30	4			
			PAYROLL TAXES	$21.58	0			
			SOCIAL SECURITY TAXES	$21.62	0			
		230	EMPLOYEE FRINGE BENEFITS	$4,582.49	0			
			OPERATION SUPERVISION A	-$2,743.39	0			
			Other Power - Oper Sup & Eng	$6,029.54	149			
			PAYROLL TAXES	$452.13	0			
			SOCIAL SECURITY TAXES	$452.17	0			
		238	EMPLOYEE FRINGE BENEFITS	$419.44	0			
			OPERATION SUPERVISION A	-$251.11	0			
			Other Power - Oper Sup & Eng	$551.90	13			
			PAYROLL TAXES	$41.39	0			
			SOCIAL SECURITY TAXES	$41.39	0			
		25W	EMPLOYEE FRINGE BENEFITS	$124.10	0			
			MISCELLANEOUS OTHER POW	-$74.29	0			
			Other Power - Oper Misc Exp	$163.21	4			
			PAYROLL TAXES	$12.22	0			
			SOCIAL SECURITY TAXES	$12.24	0			
		265	EMPLOYEE FRINGE BENEFITS	$1,845.76	0			
			GENERATION EXPENSES	$237.67	6			
			MAINTENANCE OF GENERAT	$3,923.16	111			
			MAINTENANCE OF STRUCTUR	$19.30	0			
			MISCELLANEOUS OTHER POW	$676.76	19			
			SOCIAL SECURITY TAXES	$364.32	0			
		267	EMPLOYEE FRINGE BENEFITS	$765.42	0			
			GENERATION EXPENSES	$158.19	5			
			MAINTENANCE OF GENERAT	$1,194.99	33			
			MAINTENANCE OF MISC OTH	$70.31	2			
			MAINTENANCE OF STRUCTUR	$59.77	2			
			MISCELLANEOUS OTHER POW	$530.78	14			
			SOCIAL SECURITY TAXES	$151.10	0			
		2RS	EMPLOYEE FRINGE BENEFITS	$224.34	0			
			MAINTENANCE OF GENERAT	-$134.30	0			
			Oth Pwr - Mtc Gen Elec Equip	$295.21	8			
			PAYROLL TAXES	$22.13	0			
			SOCIAL SECURITY TAXES	$22.13	0			
		ARQ	EMPLOYEE FRINGE BENEFITS	-$.86	0			
			MISCELLANEOUS OTHER POW	$.52	0			
			Other Power - Oper Misc Exp	-$1.15	0			
			PAYROLL TAXES	-$.08	0			
			SOCIAL SECURITY TAXES	-$.08	0			
		PW1	EMPLOYEE FRINGE BENEFITS	$1,051.92	0			
			MISCELLANEOUS OTHER POW	-$89.53	0			
			OPERATION SUPERVISION A	-$540.26	0			
			Other Power - Oper Misc Exp	$196.73	10			
			Other Power - Oper Sup & Eng	$1,187.43	20			
			PAYROLL TAXES	$103.80	0			
			SOCIAL SECURITY TAXES	$103.81	0			
	1000 Total			$23,776.94	421			
	1080	238	OPERATION SUPERVISION A	-$14.36	0			
			Other Power - Oper Sup & Eng	$191.52	0			
			PAYROLL TAXES	$14.36	0			
			SOCIAL SECURITY TAXES	$14.36	0			
	1080 Total			$205.88	0			
	1200	CDP	MISCELLANEOUS OTHER POW	$445.00	0			
	1200 Total			$445.00	0			
	1410	ARQ	Other Power - Oper Misc Exp	$172.37	0			
		PV8	MISCELLANEOUS OTHER POW	$565.25	0			
	1410 Total			$737.62	0			
	1430	104	Other Power - Oper Misc Exp	$94.25	0			
		CDP	MAINTENANCE OF GENERAT	$659.64	0			
			MAINTENANCE OF STRUCTUR	$140.45	0			
			MISCELLANEOUS OTHER POW	$152.88	0			
	1430 Total			$1,047.22	0			
	1440	PV8	MISCELLANEOUS OTHER POW	$17.37	0			
	1440 Total			$17.37	0			
	1460	230	MISCELLANEOUS OTHER POW	$101.30	0			
		PW1	Other Power - Oper Misc Exp	$9.39	0			
	1460 Total			$110.69	0			
	1470	104	Other Power - Oper Misc Exp	$3.00	0			
		230	MISCELLANEOUS OTHER POW	$1,163.39	0			
		PW1	Other Power - Oper Misc Exp	$61.74	0			
	1470 Total			$1,228.13	0			
	1480	230	MISCELLANEOUS OTHER POW	$42.00	0			
		CDP	MAINTENANCE OF MISCELLA	$3.90	0			
			MISCELLANEOUS OTHER POW	$7,981.55	0			
			Other Power - Oper Misc Exp	$566.41	0			
		CDZ	MISCELLANEOUS OTHER POW	$417.50	0			
	1480 Total			$9,011.36	0			
	1500	CDP	MISCELLANEOUS OTHER POW	$6,280.34	0			
			Other Power - Oper Misc Exp	-$5,838.78	0			
		PW1	MAINTENANCE OF MISC OTH	-$1,432.29	0			
	1500 Total			-$990.73	0			
200303 Total				$35,589.48	421	$23,982.82	$7,981.55	$3,625.11

200304	1000	104	EMPLOYEE FRINGE BENEFITS	$355.54	0			
			MISCELLANEOUS OTHER POW	-$212.84	0			
			Other Power - Oper Misc Exp	$467.78	11			
			PAYROLL TAXES	$35.07	0			
			SOCIAL SECURITY TAXES	$35.07	0			
		191	EMPLOYEE FRINGE BENEFITS	$242.86	0			
			OPERATION SUPERVISION AI	-$145.43	0			
			Other Power - Oper Sup & Eng	$319.62	5			
			PAYROLL TAXES	$23.96	0			
			SOCIAL SECURITY TAXES	$23.99	0			
		230	EMPLOYEE FRINGE BENEFITS	$4,971.28	0			
			OPERATION SUPERVISION AI	-$2,976.15	0			
			Other Power - Oper Sup & Eng	$6,541.10	167			
			PAYROLL TAXES	$490.53	0			
			SOCIAL SECURITY TAXES	$490.52	0			
		238	EMPLOYEE FRINGE BENEFITS	$663.84	0			
			OPERATION SUPERVISION AI	-$397.47	0			
			Other Power - Oper Sup & Eng	$873.56	22			
			PAYROLL TAXES	$65.52	0			
			SOCIAL SECURITY TAXES	$65.53	0			
		25W	EMPLOYEE FRINGE BENEFITS	$142.83	0			
			MISCELLANEOUS OTHER POW	-$85.50	0			
			Other Power - Oper Misc Exp	$187.95	5			
			PAYROLL TAXES	$14.06	0			
			SOCIAL SECURITY TAXES	$14.08	0			
		265	EMPLOYEE FRINGE BENEFITS	$2,005.40	0			
			MAINTENANCE OF GENERATI	$4,963.51	152			
			MISCELLANEOUS OTHER POW	$314.05	10			
			SOCIAL SECURITY TAXES	$395.71	0			
		267	EMPLOYEE FRINGE BENEFITS	$636.29	0			
			GENERATION EXPENSES	$156.31	5			
			MAINTENANCE OF GENERATI	$1,219.16	39			
			MISCELLANEOUS OTHER POW	$62.53	2			
			OPERATION SUPERVISION AI	$236.57	7			
			SOCIAL SECURITY TAXES	$125.52	0			
		PW1	EMPLOYEE FRINGE BENEFITS	$872.16	0			
			MISCELLANEOUS OTHER POW	-$98.46	0			
			OPERATION SUPERVISION AI	-$423.64	0			
			Other Power - Oper Misc Exp	$216.42	11			
			Other Power - Oper Sup & Eng	$931.13	18			
			PAYROLL TAXES	$86.01	0			
			SOCIAL SECURITY TAXES	$86.04	0			
	1000 Total			$23,992.01	454			
	1200	CDP	MAINTENANCE OF GENERATI	$548.80	0			
			Other Power - Oper Misc Exp	$12.00	0			
	1200 Total			$560.80	0			
	1410	ARQ	Other Power - Oper Misc Exp	$49.25	0			
		CDP	MAINTENANCE OF GENERATI	$209.87	0			
		PV8	MISCELLANEOUS OTHER POW	$565.25	0			
	1410 Total			$824.37	0			
	1430	CDP	GENERATION EXPENSES	$6,023.31	0			
			MAINTENANCE OF GENERATI	$7,881.91	0			
			MAINTENANCE OF STRUCTUR	$132.50	0			
			MISCELLANEOUS OTHER POW	$169.26	0			
	1430 Total			$14,206.98	0			
	1440	PV8	MISCELLANEOUS OTHER POW	$16.96	0			
	1440 Total			$16.96	0			
	1460	230	Other Power - Oper Misc Exp	$267.16	0			
		PW1	Other Power - Oper Misc Exp	$167.00	0			
	1460 Total			$434.16	0			
	1470	230	Other Power - Oper Misc Exp	$1,839.86	0			
		2RP	Oth Pwr - Mtc Gen Elec Equip	$102.20	0			
		PW1	Other Power - Oper Misc Exp	$1,206.91	0			
	1470 Total			$3,148.97	0			
	1480	230	Other Power - Oper Misc Exp	$35.91	0			
		25W	MAINTENANCE OF GENERATI	$76.92	0			
		265	MISCELLANEOUS OTHER POW	-$4,206.00	0			
		CDP	MAINTENANCE OF MISCELLA	$1,234.15	0			
			MISCELLANEOUS OTHER POW	$8,140.81	0			
			MISCELLANEOUS STEAM POW	$2.00	0			
			Other Power - Oper Misc Exp	$10,927.30	0			
		CDZ	MISCELLANEOUS OTHER POW	$423.43	0			
	1480 Total			$16,634.52	0			
	1500	230	MAINTENANCE OF MISC OTH	-$1,432.29	0			
			Miscellaneous Expense	$1,432.29	0			
		PW1	MAINTENANCE OF MISC OTH	$1,432.29	0			
	1500 Total			$1,432.29	0			
200304 Total				$61,251.06	454	$23,992.01	$6,863.95	$30,395.10
200305	1000	104	EMPLOYEE FRINGE BENEFITS	$401.58	0			
			MISCELLANEOUS OTHER POW	-$240.41	0			
			Other Power - Oper Misc Exp	$528.44	13			
			PAYROLL TAXES	$39.62	0			
			SOCIAL SECURITY TAXES	$39.62	0			
		191	EMPLOYEE FRINGE BENEFITS	$213.98	0			
			OPERATION SUPERVISION AI	-$128.10	0			
			Other Power - Oper Sup & Eng	$281.43	4			
			PAYROLL TAXES	$21.10	0			
			SOCIAL SECURITY TAXES	$21.12	0			
		230	EMPLOYEE FRINGE BENEFITS	$4,745.52	0			
			OPERATION SUPERVISION AI	-$2,841.01	0			
			Other Power - Oper Sup & Eng	$6,243.98	160			
			PAYROLL TAXES	$468.25	0			

200305	1000	230	SOCIAL SECURITY TAXES	$468.26	0			
		238	EMPLOYEE FRINGE BENEFITS	$543.17	0			
			OPERATION SUPERVISION AI	-$325.21	0			
			Other Power - Oper Sup & Eng	$714.72	18			
			PAYROLL TAXES	$53.61	0			
			SOCIAL SECURITY TAXES	$53.61	0			
		25W	EMPLOYEE FRINGE BENEFITS	$157.93	0			
			MISCELLANEOUS OTHER POW	-$94.57	0			
			Other Power - Oper Misc Exp	$207.75	5			
			PAYROLL TAXES	$15.59	0			
			SOCIAL SECURITY TAXES	$15.59	0			
		265	EMPLOYEE FRINGE BENEFITS	$685.86	0			
			GENERATION EXPENSES	$893.08	28			
			MAINTENANCE OF GENERATI	$414.62	13			
			MISCELLANEOUS OTHER POW	$497.03	8			
			SOCIAL SECURITY TAXES	$135.38	0			
		267	EMPLOYEE FRINGE BENEFITS	$195.71	0			
			GENERATION EXPENSES	$418.47	13			
			MAINTENANCE OF GENERATI	$96.56	3			
			SOCIAL SECURITY TAXES	$38.64	0			
		PW1	EMPLOYEE FRINGE BENEFITS	$1,004.56	0			
			MISCELLANEOUS OTHER POW	-$85.02	0			
			OPERATION SUPERVISION AI	-$516.38	0			
			Other Power - Oper Misc Exp	$186.92	10			
			Other Power - Oper Sup & Eng	$1,134.88	20			
			PAYROLL TAXES	$99.12	0			
			SOCIAL SECURITY TAXES	$99.12	0			
	1000 Total			$16,904.12	295			
	1200	CDP	MAINTENANCE OF GENERATI	-$3,244.50	0			
			MISCELLANEOUS STEAM POW	$31.94	0			
	1200 Total			-$3,212.56	0			
	1410	CDP	MAINTENANCE OF STRUCTUR	$1,800.00	0			
	1410 Total			$1,800.00	0			
	1420	CDZ	MAINTENANCE OF GENERATI	$30.90	0			
	1420 Total			$30.90	0			
	1430	CDP	GENERATION EXPENSES	$11,063.90	0			
			MAINTENANCE OF GENERATI	$17,930.16	0			
			MAINTENANCE OF MISC OTH	$880.00	0			
			MAINTENANCE OF STRUCTUR	$132.50	0			
			MISCELLANEOUS OTHER POW	$312.72	0			
	1430 Total			$30,319.28	0			
	1460	230	Other Power - Oper Misc Exp	$382.54	0			
	1460 Total			$382.54	0			
	1470	104	Other Power - Oper Misc Exp	$4.20	0			
		230	Other Power - Oper Misc Exp	$720.22	0			
		25W	Other Power - Oper Misc Exp	$91.44	0			
		PW1	Other Power - Oper Misc Exp	$265.92	0			
	1470 Total			$1,081.78	0			
	1480	CDP	MAINTENANCE OF MISCELLA	$302.46	0			
			MISCELLANEOUS OTHER POW	$7,910.11	0			
			MISCELLANEOUS STEAM POW	$40.00	0			
			Other Power - Oper Misc Exp	$784.73	0			
		CDZ	MISCELLANEOUS OTHER POW	$423.43	0			
	1480 Total			$9,460.73	0			
200305 Total				$56,766.79	295	$16,904.12	$7,194.60	$32,668.07
200306	1000	104	EMPLOYEE FRINGE BENEFITS	$791.78	0			
			MISC STEAM PWR EXP	$527.29	12			
			MISCELLANEOUS OTHER POW	-$234.12	0			
			MISCELLANEOUS STEAM POW	-$239.90	0			
			Other Power - Oper Misc Exp	$514.56	11			
			PAYROLL TAXES	$78.13	0			
			SOCIAL SECURITY TAXES	$78.13	0			
		191	EMPLOYEE FRINGE BENEFITS	$219.06	0			
			OPERATION SUPERVISION AI	-$131.14	0			
			Other Power - Oper Sup & Eng	$288.19	4			
			PAYROLL TAXES	$21.62	0			
			SOCIAL SECURITY TAXES	$21.61	0			
		230	EMPLOYEE FRINGE BENEFITS	$5,023.55	0			
			MISCELLANEOUS OTHER POW	-$88.98	0			
			OPERATION SUPERVISION AI	-$2,918.47	0			
			Other Power - Oper Misc Exp	$195.53	5			
			Other Power - Oper Sup & Eng	$6,414.23	155			
			PAYROLL TAXES	$495.69	0			
			SOCIAL SECURITY TAXES	$495.68	0			
		238	EMPLOYEE FRINGE BENEFITS	$663.83	0			
			OPERATION SUPERVISION AI	-$397.45	0			
			Other Power - Oper Sup & Eng	$673.53	21			
			PAYROLL TAXES	$65.52	0			
			SOCIAL SECURITY TAXES	$65.52	0			
		25W	EMPLOYEE FRINGE BENEFITS	$165.42	0			
			MISCELLANEOUS OTHER POW	-$99.05	0			
			Other Power - Oper Misc Exp	$217.70	5			
			PAYROLL TAXES	$16.28	0			
			SOCIAL SECURITY TAXES	$16.33	0			
		265	EMPLOYEE FRINGE BENEFITS	$1,609.49	0			
			GENERATION EXPENSES	$2,220.49	62			
			MAINTENANCE OF GENERATI	$1,342.71	35			
			MAINTENANCE OF STATION	$66.18	2			
			MISCELLANEOUS OTHER POW	$606.20	17			
			SOCIAL SECURITY TAXES	$317.56	0			
		267	EMPLOYEE FRINGE BENEFITS	$946.98	0			
			GENERATION EXPENSES	$1,247.35	34			

200306	1000	267	MAINTENANCE OF GENERATI	$553.53	15			
			MAINTENANCE OF STRUCTUR	$71.07	2			
			MISCELLANEOUS OTHER POW	$620.03	18			
			SOCIAL SECURITY TAXES	$186.90	0			
		290	EMPLOYEE FRINGE BENEFITS	$1,167.04	0			
			GENERATION EXPENSES	$2,577.68	82			
			MAINTENANCE OF GENERATI	$270.29	8			
			MISCELLANEOUS OTHER POW	$223.28	7			
			SOCIAL SECURITY TAXES	$230.34	0			
		PW1	EMPLOYEE FRINGE BENEFITS	$781.50	0			
			MISCELLANEOUS OTHER POW	-$76.11	0			
			OPERATION SUPERVISION A	-$391.76	0			
			Other Power - Oper Misc Exp	$167.23	8			
			Other Power - Oper Sup & Eng	$861.01	16			
			PAYROLL TAXES	$77.13	0			
			SOCIAL SECURITY TAXES	$77.11	0			
	1000 Total			$28,893.30	519			
	1200	CDP	MAINTENANCE OF GENERATI	$356.33	0			
	1200 Total			$356.33	0			
	1410	CDP	MAINTENANCE OF GENERATI	$11,806.61	0			
			MAINTENANCE OF STRUCTUR	$2,700.00	0			
	1410 Total			$14,506.61	0			
	1430	CDP	GENERATION EXPENSES	$1,178.93	0			
			MAINTENANCE OF GENERATI	$1,675.93	0			
			MAINTENANCE OF STRUCTUR	$217.30	0			
			MISCELLANEOUS OTHER POW	$545.16	0			
			Other Power - Oper Gen Exp	-$973.56	0			
	1430 Total			$2,643.76	0			
	1460	230	Other Power - Oper Misc Exp	$440.63	0			
		PW1	Other Power - Oper Misc Exp	$38.07	0			
	1460 Total			$478.70	0			
	1470	104	Other Power - Oper Misc Exp	$156.11	0			
		230	Other Power - Oper Misc Exp	$1,855.74	0			
		PV8	MISCELLANEOUS OTHER POW	$64.80	0			
	1470 Total			$2,076.65	0			
	1480	230	Other Power - Oper Misc Exp	$523.69	0			
		25W	Oth Pwr - Mtc Gen Elec Equip	-$178.69	0			
		CDP	MAINTENANCE OF GENERATI	$7.50	0			
			MAINTENANCE OF MISCELLA	$212.30	0			
			MISCELLANEOUS OTHER POW	$15,517.44	0			
			Other Power - Oper Misc Exp	$767.93	0			
		CDZ	MISCELLANEOUS OTHER POW	$423.43	0			
	1480 Total			$17,273.60	0			
	1500	25W	Oth Pwr - Mtc Gen Elec Equip	$178.69	0			
		CDP	GENERATION EXPENSES	-$973.56	0			
			MAINTENANCE OF MISCELLA	-$178.69	0			
			Other Power - Oper Gen Exp	$973.56	0			
	1500 Total			$.00	0			
200306 Total				$66,228.95	519	$28,893.30	$14,921.57	$22,414.08
200307	1000	104	EMPLOYEE FRINGE BENEFITS	$193.94	0			
			MISC STEAM PWR EXP	$255.14	6			
			MISCELLANEOUS STEAM POW	-$116.12	0			
			PAYROLL TAXES	$19.15	0			
			SOCIAL SECURITY TAXES	$19.15	0			
		191	EMPLOYEE FRINGE BENEFITS	$229.37	0			
			OPERATION SUPERVISION A	-$137.30	0			
			Other Power - Oper Sup & Eng	$301.72	4			
			PAYROLL TAXES	$22.63	0			
			SOCIAL SECURITY TAXES	$22.62	0			
		230	EMPLOYEE FRINGE BENEFITS	$4,875.50	0			
			OPERATION SUPERVISION A	-$2,918.83	0			
			Other Power - Oper Sup & Eng	$6,415.05	165			
			PAYROLL TAXES	$481.07	0			
			SOCIAL SECURITY TAXES	$481.08	0			
		238	EMPLOYEE FRINGE BENEFITS	$633.25	0			
			OPERATION SUPERVISION A	-$379.13	0			
			Other Power - Oper Sup & Eng	$833.22	22			
			PAYROLL TAXES	$62.50	0			
			SOCIAL SECURITY TAXES	$62.49	0			
		25W	EMPLOYEE FRINGE BENEFITS	$135.62	0			
			MISCELLANEOUS OTHER POW	-$81.33	0			
			Other Power - Oper Misc Exp	$178.74	5			
			PAYROLL TAXES	$13.38	0			
			SOCIAL SECURITY TAXES	$13.42	0			
		265	EMPLOYEE FRINGE BENEFITS	$2,637.80	0			
			GENERATION EXPENSES	$4,933.89	134			
			MAINTENANCE OF GENERATI	$1,118.94	32			
			MAINTENANCE OF STRUCTUR	$338.87	7			
			MISCELLANEOUS OTHER POW	$549.80	15			
			SOCIAL SECURITY TAXES	$520.57	0			
		267	EMPLOYEE FRINGE BENEFITS	$1,475.57	0			
			GENERATION EXPENSES	$1,644.55	44			
			MAINTENANCE OF GENERATI	$1,959.93	57			
			MAINTENANCE OF STRUCTUR	$64.40	2			
			MISCELLANEOUS OTHER POW	$214.74	5			
			SOCIAL SECURITY TAXES	$291.22	0			
		290	EMPLOYEE FRINGE BENEFITS	$3,529.23	0			
			GENERATION EXPENSES	$357.23	8			
			MAINTENANCE OF GENERATI	$863.92	19			
			MISCELLANEOUS OTHER POW	$8,065.85	251			
			SOCIAL SECURITY TAXES	$696.31	0			
		2RS	EMPLOYEE FRINGE BENEFITS	$677.00	0			

200307	1000	2R5	OPERATION SUPERVISION A	-$405.32	0			
			Other Power - Oper Sup & Eng	$890.80	24			
			PAYROLL TAXES	$66.82	0			
			SOCIAL SECURITY TAXES	$66.82	0			
		ARQ	EMPLOYEE FRINGE BENEFITS	$41.94	0			
			MISC STEAM PWR EXP	$30.06	2			
			PAYROLL TAXES	$4.14	0			
			SOCIAL SECURITY TAXES	$4.14	0			
		ECE	A&G Salaries & Wages	$25.56	1			
			ADMIN & GENERAL LABOR - E	-$5.82	0			
			ADMINISTRATIVE AND GENE	-$5.82	0			
			EMPLOYEE FRINGE BENEFITS	$9.72	0			
			EMPLOYEE PENSION & BENEF	$9.72	0			
			PAYROLL TAXES	$1.92	0			
			SOCIAL SECURITY TAXES	$1.92	0			
		PW1	EMPLOYEE FRINGE BENEFITS	$988.62	0			
			MISCELLANEOUS OTHER POW	-$89.53	0			
			OPERATION SUPERVISION A	-$502.33	0			
			Other Power - Oper Misc Exp	$196.68	10			
			Other Power - Oper Sup & Eng	$1,103.97	21			
			PAYROLL TAXES	$97.58	0			
			SOCIAL SECURITY TAXES	$97.56	0			
	1000 Total			$44,185.50	833			
	1200	CDP	MAINTENANCE OF GENERATI	$1,138.71	0			
	1200 Total			$1,138.71	0			
	1410	CDP	MAINTENANCE OF GENERATI	$5,793.00	0			
			MAINTENANCE OF STRUCTUR	$2,250.00	0			
			MISCELLANEOUS OTHER POW	$7,552.37	0			
	1410 Total			$15,595.37	0			
	1420	CDP	MISCELLANEOUS OTHER POW	$4,547.45	0			
	1420 Total			$4,547.45	0			
	1430	CDP	GENERATION EXPENSES	$10,189.54	0			
			MAINTENANCE OF GENERATI	$32,844.20	0			
			MAINTENANCE OF STATION	$2,219.64	0			
			MAINTENANCE OF STRUCTUR	$1,065.30	0			
			MISCELLANEOUS OTHER POW	$1,744.20	0			
	1430 Total			$48,062.88	0			
	1460	290	MISCELLANEOUS OTHER POW	$530.70	0			
	1460 Total			$530.70	0			
	1470	104	MISC STEAM PWR EXP	$9.00	0			
		267	MAINTENANCE OF GENERATI	$22.60	0			
		290	MISCELLANEOUS OTHER POW	$1,245.35	0			
		2RP	Other Power - Oper Misc Exp	$298.08	0			
		ARQ	MISC STEAM PWR EXP	$183.46	0			
		PM7	Other Power - Oper Misc Exp	$87.12	0			
	1470 Total			$1,845.61	0			
	1480	CDP	MAINTENANCE OF MISCELLA	$43.36	0			
			MISCELLANEOUS OTHER POW	$9,717.81	0			
			Other Power - Oper Misc Exp	$400.87	0			
		CDZ	MISCELLANEOUS OTHER POW	$211.66	0			
	1480 Total			$10,373.70	0			
	1500	290	GENERATION EXPENSES	$452.10	0			
			MAINTENANCE OF GENERATI	$54.80	0			
			MISCELLANEOUS OTHER POW	$47.95	0			
	1500 Total			$554.85	0			
200307 Total				$126,834.77	833	$44,185.50	$8,981.36	$73,667.91
200308	1000	104	EMPLOYEE FRINGE BENEFITS	$59.26	0			
			MISC STEAM PWR EXP	$77.96	2			
			MISCELLANEOUS STEAM POW	-$35.47	0			
			PAYROLL TAXES	$5.84	0			
			SOCIAL SECURITY TAXES	$5.84	0			
		191	EMPLOYEE FRINGE BENEFITS	$235.31	0			
			OPERATION SUPERVISION A	-$140.87	0			
			Other Power - Oper Sup & Eng	$309.52	4			
			PAYROLL TAXES	$23.20	0			
			SOCIAL SECURITY TAXES	$23.22	0			
		230	EMPLOYEE FRINGE BENEFITS	$3,802.90	0			
			OPERATION SUPERVISION A	-$2,276.68	0			
			Other Power - Oper Sup & Eng	$5,003.76	118			
			PAYROLL TAXES	$375.25	0			
			SOCIAL SECURITY TAXES	$375.23	0			
		238	EMPLOYEE FRINGE BENEFITS	$663.83	0			
			OPERATION SUPERVISION A	-$397.45	0			
			Other Power - Oper Sup & Eng	$873.53	21			
			PAYROLL TAXES	$65.52	0			
			SOCIAL SECURITY TAXES	$65.52	0			
		25W	EMPLOYEE FRINGE BENEFITS	$150.34	0			
			MISCELLANEOUS OTHER POW	-$90.00	0			
			Other Power - Oper Misc Exp	$197.85	5			
			PAYROLL TAXES	$14.79	0			
			SOCIAL SECURITY TAXES	$14.83	0			
		265	EMPLOYEE FRINGE BENEFITS	$3,945.44	0			
			GENERATION EXPENSES	$8,807.89	216			
			MAINTENANCE OF GENERATI	$1,548.76	41			
			MAINTENANCE OF STRUCTUR	$26.05	2			
			SOCIAL SECURITY TAXES	$778.58	0			
		267	EMPLOYEE FRINGE BENEFITS	$441.11	0			
			GENERATION EXPENSES	$1,053.24	25			
			MAINTENANCE OF GENERATI	$101.64	2			
			MAINTENANCE OF STRUCTUR	$5.68	0			
			SOCIAL SECURITY TAXES	$87.03	0			
		290	EMPLOYEE FRINGE BENEFITS	$2,808.92	0			

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200308	1000	290	GENERATION EXPENSES	$5,280.22	138			
			MAINTENANCE OF GENERATI	-$101.53	0			
			MISCELLANEOUS OTHER POW	$2,213.67	63			
			SOCIAL SECURITY TAXES	$554.25	0			
		ARQ	EMPLOYEE FRINGE BENEFITS	$125.79	0			
			MISC STEAM PWR EXP	$90.27	5			
			PAYROLL TAXES	$12.42	0			
			SOCIAL SECURITY TAXES	$12.42	0			
		CBW	EMPLOYEE FRINGE BENEFITS	$366.36	0			
			MAINT MISC STEAM PLANT	$481.98	16			
			MAINTENANCE OF MISCELLA	-$219.33	0			
			PAYROLL TAXES	$36.15	0			
			SOCIAL SECURITY TAXES	$36.15	0			
		ECE	A&G Salaries & Wages	$122.79	5			
			ADMIN & GENERAL LABOR - E	-$27.96	0			
			ADMINISTRATIVE AND GENE	-$27.96	0			
			EMPLOYEE FRINGE BENEFITS	$46.68	0			
			EMPLOYEE PENSION & BENEF	$46.68	0			
			PAYROLL TAXES	$9.24	0			
			SOCIAL SECURITY TAXES	$9.24	0			
		PW1	EMPLOYEE FRINGE BENEFITS	$1,119.84	0			
			MISCELLANEOUS OTHER POW	-$89.53	0			
			OPERATION SUPERVISION A	-$580.90	0			
			Other Power - Oper Misc Exp	$196.76	10			
			Other Power - Oper Sup & Eng	$1,276.69	21			
			PAYROLL TAXES	$110.46	0			
			SOCIAL SECURITY TAXES	$110.51	0			
	1000 Total			$40,218.73	695			
	1200	CDP	GENERATION EXPENSES	$73.68	0			
			MAINTENANCE OF GENERATI	$92.78	0			
	1200 Total			$166.46	0			
	1410	CDP	MAINTENANCE OF STRUCTUR	$3,047.57	0			
			MISCELLANEOUS OTHER POW	$8,400.00	0			
		PV8	MISCELLANEOUS OTHER POW	$646.00	0			
	1410 Total			$12,093.57	0			
	1430	265	MISCELLANEOUS OTHER POW	$475.20	0			
		CDP	GENERATION EXPENSES	$5,351.20	0			
			MAINTENANCE OF GENERATI	$322.86	0			
			MAINTENANCE OF MISC OTH	$853.00	0			
			MAINTENANCE OF STRUCTUR	$217.30	0			
			MISCELLANEOUS OTHER POW	$1,192.40	0			
	1430 Total			$8,411.96	0			
	1440	PV8	MISCELLANEOUS OTHER POW	$19.38	0			
	1440 Total			$19.38	0			
	1460	290	MAINTENANCE OF GENERATI	$192.15	0			
	1460 Total			$192.15	0			
	1470	290	MAINTENANCE OF GENERATI	$425.85	0			
	1470 Total			$425.85	0			
	1480	CDP	MAINTENANCE OF MISCELLA	$98.28	0			
			MISCELLANEOUS OTHER POW	$943.57	0			
			Other Power - Oper Misc Exp	$1,091.61	0			
		CDZ	MISCELLANEOUS OTHER POW	$423.43	0			
	1480 Total			$2,556.89	0			
	1500	290	GENERATION EXPENSES	$27.40	0			
			MAINTENANCE OF GENERATI	$130.15	0			
			MISCELLANEOUS OTHER POW	$8,051.16	0			
		CDP	MISCELLANEOUS OTHER POW	-$45,943.03	0			
	1500 Total			-$37,734.32	0			
200308 Total				$26,350.67	695	$40,218.73	-$45,943.03	$32,074.97
Grand Total				$460,904.57	4,129	$225,597.21	$14,741.27	$220,566.09

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9/15/03 3:33 pm

WorkCode_De	(All)
WorkCode	(All)
Work_Type_D	(All)
Sys_Id_Descr	(All)
Report_to_Ce	(All)
Project	(All)
Process_Id_D	(All)
Corporation_D	(All)
Corporation	(All)
Center_type	(All)
BusinessSegm	(All)
BusinessSegm	(All)
Activity_Desc	(All)
Activity	UTILSCOM
Project_Descr	BACKFEED POWER
ProcessID	(All)
Account_type	(All)
Center_Descr	(All)
Account_Desc	(All)
Center	(All)
Resource	(All)
Account	(All)

HENRY COUNTY
Backfeed Power

		$ and Units	
Accounting_Pe	Accounting_Period	Amount	Quantity
2002	200203	$24,131.96	0
	200204	$12,422.14	0
	200205	$8,492.18	0
	200206	$10,035.14	0
	200207	$9,425.01	0
	200208	$8,938.31	0
	200209	$8,457.29	0
	200210	$10,242.95	0
	200211	$8,185.42	0
	200212	$5,768.55	0
2002 Total		$106,098.95	0
2003	200301	$7,723.46	0
	200302	$7,017.81	0
	200303	$7,981.55	0
	200304	$6,863.95	0
	200305	$7,194.60	0
	200306	$14,921.57	0
	200307	$8,981.36	0
	200308	-$45,943.03	0
2003 Total		$14,741.27	0
Grand Total		$120,840.22	0

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9/15/03 4:44 pm

Work_Type_	(All)
Report_to_C	(All)
Project_Des	(All)
Project	(All)
Corporation_	(All)
Corporation	(All)
Center_type	(All)
BusinessSegi	(All)
ProcessID	(All)
BusinessSegi	(All)
Account_typ	(All)
Center_Desc	(All)
Account	(All)

MADISON - 2003 YTD AUG O&M

Madison Generation

				$ and Units			Non_Labor
Accounting_	Resource	Center	Account_Description	Amount	Quantity	Labor	O&M
200301	1000	107	Other Power - Oper Misc Exp	$156.44	3		
		174	Other Power - Oper Sup & Eng	$615.69	9		
		191	Other Power - Oper Sup & Eng	$406.85	5		
		25W	Other Power - Oper Misc Exp	$2,577.34	55		
		ARQ	Other Power - Oper Misc Exp	$1,035.89	33		
		PW1	Oth Pwr - Mtc Gen Elec Equip	$5,869.09	123		
			Other Power - Mtc Structures	$4,561.26	93		
			Other Power - Mtc Supv & Eng	$2,907.03	58		
			Other Power - Oper Gen Exp	$26,789.80	513		
			Other Power - Oper Misc Exp	$3,785.74	93		
			Other Power - Oper Sup & Eng	$16,129.76	274		
			Other Pwr - Mtc Misc Exp	$3,394.38	70		
	1000 Total			$68,229.27	1,328		
	1050	PW1	Oth Pwr - Mtc Gen Elec Equip	$19.88	0		
			Other Power - Oper Gen Exp	$198.87	0		
	1050 Total			$218.75	0		
	1200	MDC	Oth Pwr - Mtc Gen Elec Equip	-$51,470.82	0		
		MDP	Oth Pwr - Mtc Gen Elec Equip	-$44,533.96	0		
			Other Power - Oper Misc Exp	$189.00	0		
	1200 Total			-$95,815.78	0		
	1410	ARQ	Other Power - Oper Misc Exp	$49.25	0		
		MDP	Oth Pwr - Mtc Gen Elec Equip	$438.25	0		
			Other Power - Mtc Structures	$488.17	0		
			Other Power - Oper Misc Exp	$3,152.52	0		
	1410 Total			$4,128.19	0		
	1420	MCP	Oth Pwr - Mtc Gen Elec Equip	$53.25	0		
		MDP	Other Power - Mtc Structures	$341.25	0		
	1420 Total			$394.50	0		
	1430	MDC	Oth Pwr - Mtc Gen Elec Equip	$.48	0		
		MDP	Oth Pwr - Mtc Gen Elec Equip	$5,827.09	0		
			Other Power - Oper Misc Exp	$70.75	0		
	1430 Total			$5,898.32	0		
	1460	MDP	Other Power - Oper Misc Exp	$28.64	0		
	1460 Total			$28.64	0		
	1480	25W	Oth Pwr - Mtc Gen Elec Equip	$222.83	0		
		MDP	Miscellaneous Expense	$26,746.93	0		
			Oth Pwr - Mtc Gen Elec Equip	$21.18	0		
			Other Power - Oper Misc Exp	$5,027.71	0		
			Other Pwr - Mtc Misc Exp	$52.70	0		
	1480 Total			$32,071.35	0		
	1500	MDP	Intercompany Water Exp-CGE	$6,250.00	0		
	1500 Total			$6,250.00	0		
200301 Total				$21,403.24	1,328	$68,229.27	-46,826.03
200302	1000	107	Other Power - Oper Misc Exp	$286.01	5		
		174	Other Power - Oper Sup & Eng	$75.24	1		
		191	Other Power - Oper Sup & Eng	$324.88	3		
		25W	Other Power - Oper Misc Exp	$1,040.30	24		
		ARQ	Other Power - Oper Misc Exp	$1,282.12	31		
		PW1	Oth Pwr - Mtc Gen Elec Equip	$7,552.56	149		
			Other Power - Mtc Structures	$2,297.21	41		
			Other Power - Mtc Supv & Eng	$2,542.28	43		
			Other Power - Oper Gen Exp	$17,400.45	349		
			Other Power - Oper Misc Exp	$2,795.01	67		
			Other Power - Oper Sup & Eng	$16,688.98	247		

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200302	1000	PW1	Other Pwr - Mtc Misc Exp	$2,954.59	57		
	1000 Total			$55,239.63	1,018		
	1050	25W	Other Power - Oper Misc Exp	$9.94	0		
		PW1	Oth Pwr - Mtc Gen Elec Equip	$19.89	0		
			Other Power - Mtc Structures	$19.88	0		
			Other Power - Oper Gen Exp	$457.41	0		
			Other Power - Oper Misc Exp	$19.89	0		
	1050 Total			$527.01	0		
	1200	MDP	MAINTENANCE OF GENERA	$406.56	0		
			Oth Pwr - Mtc Gen Elec Equip	$11.00	0		
	1200 Total			$417.56	0		
	1410	ARQ	Other Power - Oper Misc Exp	$73.87	0		
		MDP	MAINTENANCE OF GENERA	$2,601.27	0		
			MAINTENANCE OF STRUCTU	$341.25	0		
			MISCELLANEOUS OTHER PO	$412.92	0		
			Other Power - Oper Gen Exp	$395.00	0		
			Other Power - Oper Misc Exp	$825.84	0		
	1410 Total			$4,650.15	0		
	1420	MDP	MAINTENANCE OF STRUCTU	$341.25	0		
	1420 Total			$341.25	0		
	1430	MDC	Oth Pwr - Mtc Gen Elec Equip	-$.48	0		
		MDP	MAINTENANCE OF GENERA	$3,264.00	0		
			MISCELLANEOUS OTHER PO	$409.85	0		
			MISCELLANEOUS STEAM PO	$.95	0		
			Oth Pwr - Mtc Gen Elec Equip	$541.15	0		
			Other Power - Oper Misc Exp	$541.34	0		
	1430 Total			$4,756.81	0		
	1460	MDP	Other Power - Oper Misc Exp	$71.24	0		
	1460 Total			$71.24	0		
	1470	MDP	Other Power - Oper Misc Exp	$106.44	0		
		SNV	Employee Exp - A & G Other	-$1,085.66	0		
	1470 Total			-$979.22	0		
	1480	25W	Oth Pwr - Mtc Gen Elec Equip	$414.78	0		
		MDP	MAINTENANCE OF GENERA	$59.14	0		
			MAINTENANCE OF MISCELL	$18.95	0		
			MISCELLANEOUS OTHER PO	$39,558.30	0		
			Other Power - Oper Misc Exp	$3,499.60	0		
	1480 Total			$43,550.77	0		
	1500	MDP	GENERATION EXPENSES	$.00	0		
			Intercompany Water Exp-CGE	$6,250.00	0		
	1500 Total			$6,250.00	0		
200302 Total				$114,825.20	1,018	$55,239.63	59,585.57
200303	1000	107	Other Power - Oper Misc Exp	$107.32	2		
		174	Other Power - Oper Sup & Eng	$210.38	3		
		191	Other Power - Oper Sup & Eng	$419.42	4		
		25W	Other Power - Oper Misc Exp	$1,201.78	28		
		ARQ	MISC STEAM PWR EXP	$923.35	16		
			Other Power - Oper Misc Exp	$147.92	4		
		CBW	MAINT MISC STEAM PLANT	$1,649.33	24		
		PW1	MAINTENANCE OF STATIOI	$3,969.24	72		
			Oth Pwr - Mtc Gen Elec Equip	$5,679.13	103		
			Other Power - Mtc Structures	$1,239.16	23		
			Other Power - Mtc Supv & Eng	$486.12	9		
			Other Power - Oper Gen Exp	$16,897.74	327		
			Other Power - Oper Misc Exp	$2,023.68	51		
			Other Power - Oper Sup & Eng	$17,091.30	260		
			Other Pwr - Mtc Misc Exp	$3,592.60	65		
	1000 Total			$55,638.47	990		
	1050	PW1	MAINTENANCE OF STATIOI	$79.55	0		
			Oth Pwr - Mtc Gen Elec Equip	$19.88	0		
			Other Power - Oper Gen Exp	$248.60	0		
	1050 Total			$348.03	0		
	1200	MDP	MAINTENANCE OF GENERA	$396.89	0		
			MISCELLANEOUS STEAM PO	-$.01	0		
			Other Power - Oper Misc Exp	$253.80	0		
	1200 Total			$650.68	0		
	1410	ARQ	Other Power - Oper Misc Exp	$172.37	0		
		MDP	MAINTENANCE OF GENERA	-$5,917.00	0		
			MAINTENANCE OF STRUCTU	$128.47	0		
			MISCELLANEOUS OTHER PO	$6,789.10	0		
	1410 Total			$1,172.94	0		
	1420	MDP	MISCELLANEOUS OTHER PO	$174.50	0		
	1420 Total			$174.50	0		

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200303	1430	MDP	MAINTENANCE OF GENERA	$5,837.62	0		
			MISCELLANEOUS OTHER PO	$757.73	0		
	1430 Total			$6,595.35	0		
	1460	MDP	MISCELLANEOUS OTHER PO	$19.37	0		
	1460 Total			$19.37	0		
	1470	107	Other Power - Oper Misc Exp	$39.96	0		
		MDP	MISCELLANEOUS OTHER PO	$21.68	0		
		PW1	Other Power - Oper Misc Exp	$52.56	0		
	1470 Total			$114.20	0		
	1480	MDP	MAINTENANCE OF GENERA	$80.17	0		
			MAINTENANCE OF MISCELL	$32.33	0		
			MISCELLANEOUS OTHER PO	$4,074.95	0		
			Other Power - Oper Misc Exp	$225.97	0		
	1480 Total			$4,413.42	0		
	1500	MDP	Intercompany Water Exp-CGE	$6,250.00	0		
			Other Power - Oper Misc Exp	$42.53	0		
		PW1	MAINTENANCE OF MISC OT	-$5,888.15	0		
	1500 Total			$404.38	0		
200303 Total				$69,531.34	990	$55,638.47	13,892.87
200304	1000	107	Other Power - Oper Misc Exp	$160.98	3		
		174	Other Power - Oper Sup & Eng	$140.25	2		
		191	Other Power - Oper Sup & Eng	$424.16	5		
		25W	Other Power - Oper Misc Exp	$1,136.61	26		
		ARQ	MISC STEAM PWR EXP	$160.45	3		
			Other Power - Oper Misc Exp	$907.41	27		
		PW1	3PT - Oth Pwr - Mtc Gen El Eq	$212.94	4		
			Oth Pwr - Mtc Gen Elec Equip	$26,475.64	498		
			Other Power - Mtc Structures	$650.10	12		
			Other Power - Mtc Supv & Eng	$2,197.95	41		
			Other Power - Oper Gen Exp	$17,290.40	318		
			Other Power - Oper Misc Exp	$2,201.74	58		
			Other Power - Oper Sup & Eng	$13,627.10	216		
			Other Pwr - Mtc Misc Exp	$4,208.65	78		
	1000 Total			$69,794.38	1,291		
	1050	PW1	Oth Pwr - Mtc Gen Elec Equip	$298.31	0		
			Other Power - Oper Gen Exp	$397.76	0		
			Other Power - Oper Misc Exp	$44.95	0		
	1050 Total			$741.02	0		
	1200	MDP	MAINTENANCE OF GENERA	$362.98	0		
			MISC STEAM PWR EXP	$25.00	0		
			MISCELLANEOUS OTHER PO	$59.88	0		
			Other Power - Oper Misc Exp	$25.00	0		
	1200 Total			$472.86	0		
	1410	ARQ	Other Power - Oper Misc Exp	$49.25	0		
		MDP	MAINTENANCE OF GENERA	$12,329.31	0		
			MAINTENANCE OF STRUCTU	$2,242.73	0		
			MISCELLANEOUS OTHER PO	$1,500.64	0		
	1410 Total			$16,121.93	0		
	1420	MDP	MAINTENANCE OF STRUCTU	$723.44	0		
	1420 Total			$723.44	0		
	1430	MDP	MAINTENANCE OF GENERA	$10,050.87	0		
			MISCELLANEOUS OTHER PO	$241.55	0		
	1430 Total			$10,292.42	0		
	1470	107	Other Power - Oper Misc Exp	$81.00	0		
	1470 Total			$81.00	0		
	1480	MDP	A&G MISC EXPENSES - ELEC	-$16.95	0		
			MAINTENANCE OF MISCELL	$77.89	0		
			MISCELLANEOUS OTHER PO	$82,406.54	0		
			Other Power - Oper Misc Exp	$14,291.39	0		
	1480 Total			$96,758.87	0		
	1500	MDP	A&G MISC EXPENSES - ELEC	$16.95	0		
			Intercompany Water Exp-CGE	$6,718.98	0		
		PW1	MAINTENANCE OF MISC OT	$.00	0		
			Miscellaneous Expense	$5,888.15	0		
	1500 Total			$12,624.08	0		
200304 Total				$207,610.00	1,291	$69,794.38	137,815.62
200305	1000	107	Other Power - Oper Misc Exp	$697.58	13		
		174	Other Power - Oper Sup & Eng	$140.24	2		
		191	Other Power - Oper Sup & Eng	$409.53	4		
		19M	Other Power - Oper Misc Exp	$146.59	4		
		25W	Other Power - Oper Misc Exp	$1,047.42	23		
		ARQ	Other Power - Oper Misc Exp	$1,062.28	32		
		PW1	Oth Pwr - Mtc Gen Elec Equip	$6,257.76	140		

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200305	1000	PW1	Other Power - Mtc Structures	$3,503.79	99		
			Other Power - Mtc Supv & Eng	$3,293.98	61		
			Other Power - Oper Gen Exp	$18,013.60	362		
			Other Power - Oper Misc Exp	$1,961.97	52		
			Other Power - Oper Sup & Eng	$16,187.92	257		
			Other Pwr - Mtc Misc Exp	$2,267.50	47		
	1000 Total			$54,990.16	1,095		
	1050	PW1	Other Power - Oper Gen Exp	$188.93	0		
			Other Power - Oper Misc Exp	$9.94	0		
	1050 Total			$198.87	0		
	1200	MDP	MAINTENANCE OF GENERA	$1,459.94	0		
			MAINTENANCE OF STRUCTU	$1,150.57	0		
	1200 Total			$2,610.51	0		
	1410	MDP	MAINTENANCE OF GENERA	$1,594.00	0		
			MAINTENANCE OF STRUCTU	$18,677.53	0		
			MISCELLANEOUS OTHER PO	$3,161.69	0		
	1410 Total			$23,433.22	0		
	1420	MDP	MAINTENANCE OF STRUCTU	$38,670.32	0		
			MISCELLANEOUS OTHER PO	$447.28	0		
	1420 Total			$39,117.60	0		
	1430	MDC	MAINTENANCE OF GENERA	$1,095.00	0		
		MDP	MAINTENANCE OF GENERA	$7,381.56	0		
			MISCELLANEOUS OTHER PO	$1,216.11	0		
	1430 Total			$9,692.67	0		
	1460	PW1	Other Power - Oper Misc Exp	$7.68	0		
	1460 Total			$7.68	0		
	1470	107	Other Power - Oper Misc Exp	$81.00	0		
		PW1	Oth Pwr - Mtc Gen Elec Equip	$1,259.90	0		
			Other Power - Oper Misc Exp	$112.77	0		
	1470 Total			$1,453.67	0		
	1480	MDP	MAINTENANCE OF GENERA	-$571.43	0		
			MAINTENANCE OF MISCELL	$25.00	0		
			MISC STEAM PWR EXP	$7.92	0		
			MISCELLANEOUS OTHER PO	$44,627.40	0		
			Other Power - Oper Misc Exp	$699.11	0		
	1480 Total			$44,788.00	0		
	1500	MDP	Intercompany Water Exp-CGE	$6,250.00	0		
	1500 Total			$6,250.00	0		
200305 Total				$182,542.38	1,095	$54,990.16	127,552.22
200306	1000	107	Other Power - Oper Misc Exp	$160.94	3		
		174	Other Power - Oper Sup & Eng	$140.25	2		
		191	Other Power - Oper Sup & Eng	$419.35	4		
		25W	Other Power - Oper Misc Exp	$1,076.41	23		
		ARQ	MISC STEAM PWR EXP	$3,891.17	62		
			Other Power - Oper Misc Exp	$1,074.71	29		
		PW1	Oth Pwr - Mtc Gen Elec Equip	$6,660.50	138		
			Other Power - Mtc Structures	$3,414.01	80		
			Other Power - Mtc Supv & Eng	$3,136.61	55		
			Other Power - Oper Gen Exp	$16,251.83	331		
			Other Power - Oper Misc Exp	$3,287.40	108		
			Other Power - Oper Sup & Eng	$16,287.45	252		
			Other Pwr - Mtc Misc Exp	$13,116.58	272		
	1000 Total			$68,917.21	1,357		
	1050	PW1	Oth Pwr - Mtc Gen Elec Equip	$19.89	0		
			Other Power - Oper Gen Exp	$39.77	0		
			Other Power - Oper Sup & Eng	$19.89	0		
	1050 Total			$79.55	0		
	1200	MDP	MAINTENANCE OF GENERA	$5,393.30	0		
			MISCELLANEOUS OTHER PO	$18.29	0		
			MISCELLANEOUS STEAM PO	-$49.42	0		
	1200 Total			$5,362.17	0		
	1300	ARQ	Other Power - Oper Misc Exp	$115.50	0		
	1300 Total			$115.50	0		
	1410	ARQ	Other Power - Oper Misc Exp	$51.22	0		
		MDC	MISCELLANEOUS OTHER PO	$350.00	0		
		MDP	MAINTENANCE OF GENERA	$9,500.00	0		
			MAINTENANCE OF STRUCTU	$2,453.57	0		
			MISCELLANEOUS OTHER PO	$3,748.04	0		
	1410 Total			$16,102.83	0		
	1420	MDP	MAINTENANCE OF STRUCTU	$412.01	0		
			MISCELLANEOUS OTHER PO	$140.00	0		
	1420 Total			$552.01	0		
	1430	MDP	MAINTENANCE OF GENERA	$10,817.69	0		

200306	1430	MDP	MISCELLANEOUS OTHER PO	$3,674.27	0		
	1430 Total			$14,491.96	0		
	1460	ARQ	MISC STEAM PWR EXP	$39.57	0		
			Other Power - Oper Misc Exp	$264.51	0		
		MDP	Other Power - Oper Misc Exp	$35.03	0		
	1460 Total			$339.11	0		
	1470	107	Other Power - Oper Misc Exp	$81.00	0		
		ARQ	MISC STEAM PWR EXP	$115.20	0		
			Other Power - Oper Misc Exp	$434.26	0		
		MDP	Other Power - Oper Misc Exp	$232.73	0		
	1470 Total			$863.19	0		
	1480	25W	MISCELLANEOUS OTHER PO	$73.93	0		
		MDP	MAINTENANCE OF GENERA	$15.77	0		
			MAINTENANCE OF MISCELL	$45.00	0		
			MISCELLANEOUS OTHER PO	$35,543.88	0		
			Other Power - Oper Misc Exp	$232.37	0		
	1480 Total			$35,910.95	0		
	1500	MDP	Intercompany Water Exp-CGE	$6,250.00	0		
	1500 Total			$6,250.00	0		
200306 Total				$148,984.48	1,357	$68,917.21	80,067.27
200307	1000	107	Other Power - Oper Misc Exp	$971.23	17		
		174	Other Power - Oper Sup & Eng	$217.39	3		
		191	Other Power - Oper Sup & Eng	$439.37	4		
		25W	Other Power - Oper Misc Exp	$1,111.04	26		
		ARQ	MISC STEAM PWR EXP	$1,249.22	39		
			Other Power - Oper Misc Exp	$4,105.30	97		
		PM7	Other Power - Oper Misc Exp	$398.30	7		
		PW1	Oth Pwr - Mtc Gen Elec Equip	$7,105.23	144		
			Other Power - Mtc Structures	$3,081.61	70		
			Other Power - Mtc Supv & Eng	$2,972.45	58		
			Other Power - Oper Gen Exp	$21,627.04	415		
			Other Power - Oper Misc Exp	$2,186.08	61		
			Other Power - Oper Sup & Eng	$12,909.83	213		
			Other Pwr - Mtc Misc Exp	$4,954.28	101		
	1000 Total			$63,328.37	1,255		
	1050	PW1	Other Power - Oper Gen Exp	$49.71	0		
			Other Power - Oper Sup & Eng	$39.78	0		
			Other Pwr - Mtc Misc Exp	$29.82	0		
	1050 Total			$119.31	0		
	1200	MDP	MAINTENANCE OF GENERA	$7,311.91	0		
			MAINTENANCE OF MISC OT	$41.11	0		
			MAINTENANCE OF STRUCTU	$14.84	0		
			MISCELLANEOUS OTHER PO	$867.40	0		
	1200 Total			$8,235.26	0		
	1410	MDP	GENERATION EXPENSES	$375.00	0		
			MAINTENANCE OF GENERA	$57,221.12	0		
			MAINTENANCE OF STRUCTU	$6,473.52	0		
			MISCELLANEOUS OTHER PO	$1,992.40	0		
	1410 Total			$66,062.04	0		
	1420	MDP	MAINTENANCE OF GENERA	$18,037.13	0		
			MAINTENANCE OF STRUCTU	$511.69	0		
	1420 Total			$18,548.82	0		
	1430	MDP	MAINTENANCE OF GENERA	$4,348.68	0		
			MISCELLANEOUS OTHER PO	$3,778.30	0		
	1430 Total			$8,126.98	0		
	1470	107	Other Power - Oper Misc Exp	$38.16	0		
		ARQ	MISC STEAM PWR EXP	$145.80	0		
		PW1	Other Power - Oper Misc Exp	$9.72	0		
	1470 Total			$193.68	0		
	1480	MDP	MAINTENANCE OF GENERA	$15.77	0		
			MISCELLANEOUS OTHER PO	$33,852.89	0		
			Other Power - Oper Misc Exp	$201.34	0		
	1480 Total			$34,070.00	0		
	1500	191	MAINTENANCE OF MISC OT	$159.00	0		
		MDP	Intercompany Water Exp-CGE	$6,250.00	0		
	1500 Total			$6,409.00	0		
200307 Total				$205,093.46	1,255	$63,328.37	141,765.09
200308	1000	107	Other Power - Oper Misc Exp	$59.02	1		
		174	Other Power - Oper Sup & Eng	$490.85	7		
		191	Other Power - Oper Sup & Eng	$450.81	4		
		25W	Other Power - Oper Misc Exp	$1,313.87	30		
		ARQ	MISC STEAM PWR EXP	$253.84	4		
			Other Power - Oper Misc Exp	$1,076.17	28		

200308	1000	PW1	Oth Pwr - Mtc Gen Elec Equip	$8,424.64	159		
			Other Power - Mtc Structures	$3,648.84	126		
			Other Power - Mtc Supv & Eng	$3,450.29	61		
			Other Power - Oper Gen Exp	$26,604.51	530		
			Other Power - Oper Misc Exp	$2,490.64	64		
			Other Power - Oper Sup & Eng	$14,249.62	212		
			Other Pwr - Mtc Misc Exp	$3,500.87	68		
	1000 Total			$66,013.97	1,293		
	1050	PW1	Oth Pwr - Mtc Gen Elec Equip	$69.61	0		
			Other Power - Oper Gen Exp	$109.38	0		
			Other Power - Oper Sup & Eng	$29.83	0		
			Other Pwr - Mtc Misc Exp	$19.88	0		
	1050 Total			$228.70	0		
	1200	MDP	MAINTENANCE OF GENERAT	$113,975.00	0		
			MISCELLANEOUS OTHER PO	$31.80	0		
	1200 Total			$114,006.80	0		
	1300	174	Other Power - Oper Sup & Eng	$15.40	0		
	1300 Total			$15.40	0		
	1410	MDP	GENERATION EXPENSES	$790.00	0		
			MAINTENANCE OF GENERAT	$44,351.77	0		
			MAINTENANCE OF STRUCTU	$6,639.45	0		
			MISCELLANEOUS OTHER PO	$29,589.60	0		
	1410 Total			$81,370.82	0		
	1420	MDP	MAINTENANCE OF GENERAT	$33,521.18	0		
	1420 Total			$33,521.18	0		
	1430	MDP	MAINTENANCE OF GENERAT	$4,753.06	0		
			MISCELLANEOUS OTHER PO	$877.23	0		
	1430 Total			$5,630.29	0		
	1460	MDP	MISCELLANEOUS OTHER PO	$232.19	0		
	1460 Total			$232.19	0		
	1480	25W	MAINTENANCE OF MISCELL	$412.84	0		
		MDP	MAINTENANCE OF GENERAT	$15.77	0		
			MISC STEAM PWR EXP	$117.71	0		
			MISCELLANEOUS OTHER PO	$38,024.15	0		
			Other Power - Oper Misc Exp	$243.34	0		
	1480 Total			$38,813.81	0		
	1500	MDP	Intercompany Water Exp-CGE	$12,877.66	0		
	1500 Total			$12,877.66	0		
200308 Total				$352,710.82	1,293	$66,013.97	286,696.85
Grand Total				$1,302,700.92	9,626	$502,151.46	$800,549.46

09603-030405

FRT - v 3.00.0060
9/15/03 4:44 pm

Work_Type_	(All)
Report_to_C	(All)
Project_Des	BACKFEED POWER
Project	(All)
Corporation_	(All)
Corporation	(All)
Center_type	(All)
BusinessSegr	(All)
ProcessID	(All)
BusinessSegr	(All)
Account_typ	(All)
Center_Desc	(All)
Account	(All)

MADISON - 2003 YTD AUG O&M

				$ and Units	
Resource	Accounting_Peri	Center	Account_Description	Amount	Quantity
1480	200301	MDP	Other Power - Oper Misc Exp	$1,645.85	0
	200301 Total			$1,645.85	0
	200302	MDP	MISCELLANEOUS OTHER POWER GENE	$39,558.30	0
	200302 Total			$39,558.30	0
	200303	MDP	MISCELLANEOUS OTHER POWER GENE	$1,835.32	0
	200303 Total			$1,835.32	0
	200304	MDP	MISCELLANEOUS OTHER POWER GENE	$80,862.55	0
	200304 Total			$80,862.55	0
	200305	MDP	MISCELLANEOUS OTHER POWER GENE	$44,063.03	0
	200305 Total			$44,063.03	0
	200306	MDP	MISCELLANEOUS OTHER POWER GENE	$32,676.30	0
	200306 Total			$32,676.30	0
	200307	MDP	MISCELLANEOUS OTHER POWER GENE	$32,193.89	0
	200307 Total			$32,193.89	0
	200308	MDP	MISCELLANEOUS OTHER POWER GENE	$33,321.84	0
	200308 Total			$33,321.84	0
1480 Total				$266,157.08	0
Grand Total				$266,157.08	0

Attachment OUCC/PSI 6-182-F

FRT - v 3.00.0054
5/12/03 1:36 pm

Work_Type_Descrip	(All)
Report_to_Center	(All)
Process_Id_Descrip	(All)
Corporation_Descrip	(All)
Corporation	(All)
ProcessID	(All)
Center_type	(All)
Center_Description	(All)
BusinessSegment_D	(All)
BusinessSegment	(All)

Madison - 2001

Labor by Center 01 Activity

				$ and Units	
Resource	Accounting_Period	Center	Account	Amount	Quantity
1000	200101	104	506200	$99.72	2
		104 Total		$99.72	2
		25W	401431	$509.46	16
		25W Total		$509.46	16
		ARQ	401651	$152.34	3
			506200	$473.86	11
		ARQ Total		$626.20	14
		ECE	401484	$287.36	9
		ECE Total		$287.36	9
		ECP	557200	$3,261.07	41
		ECP Total		$3,261.07	41
		MDP	401631	-$.07	0
		MDP Total		-$.07	0
		PW1	401431	$15,749.60	360
			401451	$9,288.23	213
			401631	$17,422.26	357
			401651	$8,048.15	174
			549000	$280.85	6
			551000	$1,804.10	38
		PW1 Total		$52,593.19	1,147
		SNV	401631	$741.41	12
		SNV Total		$741.41	12
		TE7	401631	$993.34	18
		TE7 Total		$993.34	18
	200101 Total			$59,111.68	1,258
	200102	107	401461	$1,055.59	23
		107 Total		$1,055.59	23
		25W	401431	$425.24	12
		25W Total		$425.24	12
		ARQ	506200	$318.97	9
		ARQ Total		$318.97	9
		ECE	401484	$392.51	12
		ECE Total		$392.51	12
		ECP	557200	$1,758.53	20
		ECP Total		$1,758.53	20
		PW1	401431	$13,613.52	319

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1000	200102	PW1	401451	$15,262.92	311
			401631	$18,853.35	340
			401651	$3,660.02	82
			551000	$3,880.26	63
		PW1 Total		$55,270.07	1,114
		SNV	401631	$288.32	5
		SNV Total		$288.32	5
		TE7	401631	$937.17	18
		TE7 Total		$937.17	18
	200102 Total			$60,446.40	1,213
	200103	107	401461	$183.56	4
		107 Total		$183.56	4
		25W	401431	-$1,076.09	-28
			401631	$2,933.71	82
		25W Total		$1,857.62	54
		ARQ	401651	$207.03	4
			506200	$358.53	10
		ARQ Total		$565.56	14
		ECE	401484	$349.25	11
		ECE Total		$349.25	11
		ECP	557200	$1,999.54	22
		ECP Total		$1,999.54	22
		PW1	401431	$22,718.29	493
			401451	$14,607.48	300
			401631	$21,504.90	360
			401651	$699.20	13
			500000	$219.71	5
			549000	$139.35	3
			551000	$3,892.09	66
			553000	$98.92	2
		PW1 Total		$63,879.94	1,241
		SNV	401631	$222.74	4
		SNV Total		$222.74	4
		TE7	401631	$3,266.98	56
		TE7 Total		$3,266.98	56
	200103 Total			$72,325.19	1,405
	200104	107	401461	$308.70	7
		107 Total		$308.70	7
		25W	401631	$662.07	20
		25W Total		$662.07	20
		ARQ	401651	$501.77	8
			506200	$346.75	10
		ARQ Total		$848.52	18
		ECE	401484	$324.71	10
		ECE Total		$324.71	10
		ECP	557200	$1,999.51	21
		ECP Total		$1,999.51	21
		PW1	401431	$14,347.51	312
			401451	$13,095.40	258
			401631	$19,507.31	347
			401651	$299.13	6
			548000	$205.20	4

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1000	200104	PW1	549000	$733.58	17
			551000	-$254.73	3
		PW1 Total		$47,933.40	947
		SNP	401631	$1,024.65	15
		SNP Total		$1,024.65	15
		TE7	401631	$449.82	8
		TE7 Total		$449.82	8
	200104 Total			$53,551.38	1,046
	200105	104	506200	$103.52	2
		104 Total		$103.52	2
		107	401461	$301.09	7
		107 Total		$301.09	7
		25W	401631	$1,136.47	33
		25W Total		$1,136.47	33
		ARQ	401651	$399.34	9
			506200	$256.05	9
		ARQ Total		$655.39	18
		CBW	920010	$44.62	0
		CBW Total		$44.62	0
		ECE	401484	$353.18	11
		ECE Total		$353.18	11
		ECP	557200	$1,916.30	22
		ECP Total		$1,916.30	22
		PW1	401431	$18,760.44	437
			401451	$20,787.30	450
			401631	$19,144.59	369
			401651	$634.36	15
			548000	$183.67	4
			549000	$234.97	5
			551000	$2,144.61	37
		PW1 Total		$61,889.94	1,317
		TE7	401631	$8,907.95	144
		TE7 Total		$8,907.95	144
	200105 Total			$75,308.46	1,553
	200106	107	401461	$224.15	5
		107 Total		$224.15	5
		25W	401631	$264.22	8
		25W Total		$264.22	8
		2RS	401651	$241.38	6
		2RS Total		$241.38	6
		ARQ	401651	$1,973.60	46
			506200	$604.99	21
		ARQ Total		$2,578.59	67
		CBW	920010	$28.14	0
		CBW Total		$28.14	0
		ECE	401484	$176.14	6
		ECE Total		$176.14	6
		ECP	557200	$1,999.50	21
		ECP Total		$1,999.50	21
		PW1	401431	$14,176.60	347
			401451	$13,748.29	317
			401631	$20,574.00	349

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1000	200106	PW1	401651	$652.17	15
			548000	$172.10	4
			549000	$173.63	4
			551000	$88.94	2
		PW1 Total		$49,585.73	1,038
		TE7	401631	$2,025.11	37
		TE7 Total		$2,025.11	37
	200106 Total			$57,122.96	1,186
	200107	25W	401631	$130.19	4
		25W Total		$130.19	4
		ARQ	506200	$1,043.70	30
		ARQ Total		$1,043.70	30
		CBW	510200	$43.60	0
		CBW Total		$43.60	0
		ECE	401484	$398.65	11
		ECE Total		$398.65	11
		ECP	557200	$1,899.60	21
		ECP Total		$1,899.60	21
		PW1	401431	$34,406.93	763
			401446	$166.98	4
			401451	$11,950.82	264
			401631	$1,107.12	205
			401651	$2,363.66	51
			500000	$95.86	2
			506000	$1,325.80	5
			548000	$490.40	9
			549000	$615.94	13
			551000	$88.58	2
			551200	$18,181.70	160
		PW1 Total		$70,793.79	1,477
		TE7	401631	$257.05	4
		TE7 Total		$257.05	4
	200107 Total			$74,566.58	1,546
	200108	25W	401631	$396.68	12
		25W Total		$396.68	12
		ARQ	506200	$625.06	16
		ARQ Total		$625.06	16
		CBE	500200	$173.84	4
			502200	$173.84	4
			510200	$2,284.38	56
		CBE Total		$2,632.06	64
		CBW	510200	$196.46	0
		CBW Total		$196.46	0
		ECE	401484	$419.51	12
		ECE Total		$419.51	12
		ECP	557200	$1,916.28	22
		ECP Total		$1,916.28	22
		PW1	401431	$34,058.17	788
			401446	$10.09	0
			401451	$3,062.64	76
			401631	$12,137.80	246
			401651	$3,083.76	70

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1000	200108	PW1	500000	$34.90	2
			548000	$21.32	1
			549000	$86.62	2
			551200	$418.56	6
		PW1 Total		$52,913.86	1,190
		TE7	401631	$1,574.41	26
			551200	$817.92	14
		TE7 Total		$2,392.33	40
		TE8	510200	$495.04	10
		TE8 Total		$495.04	10
	200108 Total			$61,987.28	1,365
	200109	107	401461	$958.01	20
		107 Total		$958.01	20
		25W	401631	$130.19	4
			592000	$140.47	4
		25W Total		$270.66	8
		ARQ	401651	$193.86	3
			506200	$1,304.39	25
		ARQ Total		$1,498.25	28
		ECE	401484	$398.69	10
		ECE Total		$398.69	10
		ECP	557200	$1,699.56	17
		ECP Total		$1,699.56	17
		PW1	401431	$22,519.54	505
			401451	$4,163.99	91
			401631	$12,788.35	216
			401651	$1,162.98	26
			548000	$141.45	3
			551200	$1,668.83	19
		PW1 Total		$42,445.14	860
	200109 Total			$47,270.31	942
	200110	107	401451	$259.56	6
			401461	$377.54	8
		107 Total		$637.10	14
		25W	401631	$130.19	4
		25W Total		$130.19	4
		ARQ	401651	$56.46	1
			506200	$1,164.28	28
		ARQ Total		$1,220.74	29
		CBW	510200	$795.67	13
		CBW Total		$795.67	13
		ECE	401484	$400.29	12
		ECE Total		$400.29	12
		ECP	557200	$1,061.32	13
		ECP Total		$1,061.32	13
		PM8	401446	$885.55	18
		PM8 Total		$885.55	18
		PW1	401431	$7,154.58	177
			401451	-$21.57	-1
			401631	$441.24	10
			401651	$41.88	1
			546000	$9,728.40	190

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1000	200110	PW1	546200	$1,756.35	23
			548000	$711.26	15
			551000	-$5.00	0
			551200	$1,058.81	12
			552000	$361.61	9
			553000	$1,570.78	37
			554000	$2,278.09	53
		PW1 Total		$25,076.43	525
		TE7	551200	$2,755.13	43
		TE7 Total		$2,755.13	43
	200110 Total			$32,962.42	670
	200111	107	401461	$943.42	20
		107 Total		$943.42	20
		25W	401631	$521.59	16
		25W Total		$521.59	16
		ARQ	401651	-$56.46	-1
			506200	$381.67	12
		ARQ Total		$325.21	11
		CBW	510200	$62.78	0
		CBW Total		$62.78	0
		ECE	401484	$379.45	13
		ECE Total		$379.45	13
		ECP	557200	-$2,535.82	-28
		ECP Total		-$2,535.82	-28
		PM8	401446	$274.71	6
			548000	$432.94	8
			549000	$196.80	4
		PM8 Total		$904.45	18
		PW1	401431	$7,291.99	167
			401451	$25.67	1
			401631	$48.25	1
			500000	$21.11	1
			546000	$8,201.97	151
			546200	$1,529.42	19
			548000	$502.38	12
			549000	$142.39	5
			551200	-$157.62	-2
			552000	$313.88	7
			553000	$1,118.39	25
			554000	$3,195.68	69
		PW1 Total		$22,233.51	453
	200111 Total			$22,834.59	502
	200112	104	506200	$348.21	8
		104 Total		$348.21	8
		107	401461	$45.70	1
		107 Total		$45.70	1
		25W	401631	-$650.99	-20
			549000	$1,180.44	36
		25W Total		$529.45	16
		ARQ	506200	$33.28	1
			549200	$294.76	9
		ARQ Total		$328.04	9

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1000	200112	ECE	401484	$1,066.12	27
		ECE Total		$1,066.12	27
		ECP	557200	-$4,040.98	-45
		ECP Total		-$4,040.98	-45
		PW1	401431	-$7,098.64	-165
			401631	-$491.16	-10
			500000	-$20.88	-1
			546000	$10,790.42	197
			546200	$920.28	11
			548000	$8,926.65	203
			549000	$3,067.73	100
			551000	-$94.15	-2
			552000	$335.83	8
			553000	$3,056.97	73
			554000	$4,936.22	118
		PW1 Total		$24,329.27	532
		TEF	509100	$10,485.22	263
			549210	$1,016.52	31
		TEF Total		$11,501.74	294
	200112 Total			$34,107.55	842
1000 Total				$651,594.80	13,529
1050	200101	PW1	401431	$135.46	0
			401451	$58.06	0
			401631	$129.27	0
			549000	$19.35	0
		PW1 Total		$342.14	0
	200101 Total			$342.14	0
	200102	PW1	401431	$309.61	0
			401451	$154.81	0
			401631	$178.99	0
			401651	$87.09	0
			551000	$9.94	0
		PW1 Total		$740.44	0
	200102 Total			$740.44	0
	200103	25W	401431	$19.35	0
			401631	$19.35	0
		25W Total		$38.70	0
		PW1	401431	$387.02	0
			401451	$241.90	0
			401631	$139.21	0
			401651	$19.35	0
		PW1 Total		$787.48	0
	200103 Total			$826.18	0
	200104	25W	401631	$9.95	0
		25W Total		$9.95	0
		PW1	401431	$218.77	0
			401451	$218.78	0
			401631	$119.33	0
			401651	$9.95	0
		PW1 Total		$566.83	0
	200104 Total			$576.78	0
	200105	25W	401631	$9.94	0

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1050	200105	25W Total		$9.94	0
		PW1	401431	$109.38	0
			401451	$79.55	0
			401631	$178.99	0
			548000	$9.94	0
		PW1 Total		$377.86	0
	200105 Total			$387.80	0
	200106	PW1	401431	$119.32	0
			401451	$19.88	0
			401631	$49.72	0
		PW1 Total		$188.92	0
	200106 Total			$188.92	0
	200107	PW1	401431	$169.04	0
			401451	$139.21	0
			401631	$119.33	0
			548000	$9.94	0
		PW1 Total		$437.52	0
	200107 Total			$437.52	0
	200108	PW1	401431	$149.16	0
			401451	$29.82	0
			401631	$99.43	0
		PW1 Total		$278.41	0
	200108 Total			$278.41	0
	200109	PW1	401431	$258.53	0
			401631	$59.67	0
		PW1 Total		$318.20	0
	200109 Total			$318.20	0
	200110	PW1	401431	$39.77	0
			401631	$29.83	0
			500000	$1,075.00	0
			546000	$29.83	0
			552000	$9.94	0
		PW1 Total		$1,184.37	0
	200110 Total			$1,184.37	0
	200111	PW1	401431	$89.49	0
			548000	$9.94	0
		PW1 Total		$99.43	0
	200111 Total			$99.43	0
	200112	PW1	546000	$39.77	0
			548000	$39.78	0
		PW1 Total		$79.55	0
	200112 Total			$79.55	0
1050 Total				$5,459.74	0
1200	200101	MDC	510000	-$15,228.48	0
		MDC Total		-$15,228.48	0
		MDP	401431	$918.75	0
		MDP Total		$918.75	0
	200101 Total			-$14,309.73	0
	200102	MDP	401431	$315.69	0
			401651	$151.96	0
		MDP Total		$467.65	0
		PM4	506000	$100.09	0

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1200	200102	PM4 Total		$100.09	0
	200102 Total			$567.74	0
	200103	MDC	510000	-$7,873.92	0
		MDC Total		-$7,873.92	0
		MDP	401431	$538.15	0
		MDP Total		$538.15	0
	200103 Total			-$7,335.77	0
	200104	MDC	401431	$1,117.25	0
			510000	-$24,130.82	0
		MDC Total		-$23,013.57	0
		MDP	401431	$847.63	0
		MDP Total		$847.63	0
	200104 Total			-$22,165.94	0
	200105	MDC	510000	-$74,250.39	0
		MDC Total		-$74,250.39	0
		MDP	401431	$3,274.44	0
		MDP Total		$3,274.44	0
	200105 Total			-$70,975.95	0
	200106	MDC	401431	$5.02	0
			510000	-$83,382.71	0
		MDC Total		-$83,377.69	0
		MDP	401431	$234.84	0
		MDP Total		$234.84	0
	200106 Total			-$83,142.85	0
	200107	MDP	401431	$769.42	0
			401651	$778.00	0
		MDP Total		$1,547.42	0
	200107 Total			$1,547.42	0
	200108	MDC	510000	-$1,135,835.84	0
		MDC Total		-$1,135,835.84	0
		MDP	401431	-$49.81	0
		MDP Total		-$49.81	0
	200108 Total			-$1,135,885.65	0
	200109	MDC	510000	-$33,018.30	0
		MDC Total		-$33,018.30	0
		MDP	401431	$380.30	0
		MDP Total		$380.30	0
	200109 Total			-$32,638.00	0
	200110	MDC	510000	-$13,815.35	0
		MDC Total		-$13,815.35	0
		MDP	401431	$390.72	0
			553000	$532.40	0
		MDP Total		$923.12	0
	200110 Total			-$12,892.23	0
	200111	MDC	553000	-$4,704.00	0
		MDC Total		-$4,704.00	0
		MDP	549000	$127.77	0
			553000	-$1,292.28	0
		MDP Total		-$1,164.51	0
	200111 Total			-$5,868.51	0
	200112	MDP	553000	$659.42	0
		MDP Total		$659.42	0

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1200	200112 Total			$659.42	0
1200 Total				-$1,382,440.05	0
1300	200101	TE7	401631	$39.38	0
		TE7 Total		$39.38	0
	200101 Total			$39.38	0
	200102	TE7	401631	$150.30	0
		TE7 Total		$150.30	0
	200102 Total			$150.30	0
	200103	TE7	401631	$82.50	0
		TE7 Total		$82.50	0
	200103 Total			$82.50	0
	200104	TE7	401631	$190.35	0
		TE7 Total		$190.35	0
	200104 Total			$190.35	0
	200108	TE7	551200	$38.00	0
		TE7 Total		$38.00	0
	200108 Total			$38.00	0
	200110	TE7	551200	$36.00	0
		TE7 Total		$36.00	0
	200110 Total			$36.00	0
1300 Total				$536.53	0
1410	200101	MDP	401431	$10,121.61	0
			401446	$737.60	0
			401451	$60.00	0
			506000	$1,868.64	0
		MDP Total		$12,787.85	0
	200101 Total			$12,787.85	0
	200102	MDP	401431	$9,718.20	0
			401446	$2,874.50	0
			401451	$60.00	0
		MDP Total		$12,652.70	0
	200102 Total			$12,652.70	0
	200103	ARQ	401651	$115.00	0
		ARQ Total		$115.00	0
		MDP	401431	$14,791.60	0
			401451	$60.00	0
		MDP Total		$14,851.60	0
	200103 Total			$14,966.60	0
	200104	MDP	401431	$15,701.49	0
			401446	$790.00	0
			401651	$23,549.28	0
		MDP Total		$40,040.77	0
	200104 Total			$40,040.77	0
	200105	ARQ	401651	$143.55	0
		ARQ Total		$143.55	0
		MDP	401431	$4,159.48	0
			401446	$395.00	0
			401451	$60.00	0
			401651	$25,944.70	0
		MDP Total		$30,559.18	0
	200105 Total			$30,702.73	0
	200106	ARQ	401651	$33.26	0

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1410	200106	ARQ Total		$33.26	0
		MDP	401431	$82,955.79	0
			401446	$790.00	0
			401451	$128.00	0
		MDP Total		$83,873.79	0
	200106 Total			$83,907.05	0
	200107	ARQ	401651	$382.80	0
		ARQ Total		$382.80	0
		MDP	401431	$16,925.36	0
			401446	$395.00	0
			401451	$15,450.37	0
			401651	-$5,429.85	0
		MDP Total		$27,340.88	0
	200107 Total			$27,723.68	0
	200108	ARQ	401651	$119.63	0
		ARQ Total		$119.63	0
		MDP	401431	$14,144.68	0
			401446	$790.00	0
			401451	$120.00	0
			401651	$866.26	0
		MDP Total		$15,920.94	0
	200108 Total			$16,040.57	0
	200109	MDP	401431	$6,813.73	0
			401446	$2,315.00	0
			401651	$5,451.11	0
		MDP Total		$14,579.84	0
	200109 Total			$14,579.84	0
	200110	MDP	401431	$16,381.89	0
			401451	$60.00	0
			549000	$8,907.65	0
		MDP Total		$25,349.54	0
	200110 Total			$25,349.54	0
	200111	ARQ	401651	$191.40	0
		ARQ Total		$191.40	0
		MDP	401446	$790.00	0
			548000	$3,711.31	0
			549000	$8,091.22	0
			553000	$16,060.30	0
		MDP Total		$28,652.83	0
	200111 Total			$28,844.23	0
	200112	MDP	548000	$2,385.00	0
			549000	$709.80	0
			553000	$3,315.09	0
		MDP Total		$6,409.89	0
	200112 Total			$6,409.89	0
1410 Total				$314,005.45	0
1420	200101	MDP	401431	$1,619.68	0
			401446	$1,106.40	0
		MDP Total		$2,726.08	0
	200101 Total			$2,726.08	0
	200102	MDP	401431	$2,618.99	0
			401446	$2,624.50	0

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1420	200102	MDP Total		$5,243.49	0
	200102 Total			$5,243.49	0
	200103	MDP	401431	$9,714.32	0
		MDP Total		$9,714.32	0
	200103 Total			$9,714.32	0
	200104	MDP	401431	$12,919.11	0
			401651	$22,856.65	0
		MDP Total		$35,775.76	0
	200104 Total			$35,775.76	0
	200105	MDP	401431	$684.47	0
		MDP Total		$684.47	0
	200105 Total			$684.47	0
	200106	MDP	401431	$2,698.50	0
		MDP Total		$2,698.50	0
	200106 Total			$2,698.50	0
	200107	MDP	401431	$5,896.64	0
		MDP Total		$5,896.64	0
	200107 Total			$5,896.64	0
	200108	MDP	401431	$3,802.51	0
			401651	$14,053.91	0
		MDP Total		$17,856.42	0
	200108 Total			$17,856.42	0
	200109	MDP	401431	$354.75	0
			401651	$1,797.03	0
		MDP Total		$2,151.78	0
	200109 Total			$2,151.78	0
	200110	MDP	401431	$433.78	0
			401446	$433.72	0
		MDP Total		$867.50	0
	200110 Total			$867.50	0
	200111	MDP	549000	$149.36	0
			553000	$695.64	0
		MDP Total		$845.00	0
	200111 Total			$845.00	0
	200112	MDP	548000	$2,000.00	0
			549000	$4,089.06	0
			553000	$2,773.14	0
		MDP Total		$8,862.20	0
	200112 Total			$8,862.20	0
1420 Total				$93,322.16	0
1430	200101	MDC	510000	-$44.99	0
		MDC Total		-$44.99	0
		MDP	401431	$4,296.06	0
			401451	$6,674.11	0
			401651	$428.00	0
		MDP Total		$11,398.17	0
	200101 Total			$11,353.18	0
	200102	MCP	553000	$517.66	0
		MCP Total		$517.66	0
		MDP	401431	$7,334.14	0
			401451	-$65.55	0
			401651	$1,652.52	0

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1430	200102	MDP Total		$8,921.11	0
	200102 Total			$9,438.77	0
	200103	25W	506600	$.19	0
		25W Total		$.19	0
		MCP	553000	$268.17	0
		MCP Total		$268.17	0
		MDC	510000	-$2.76	0
		MDC Total		-$2.76	0
		MDP	401431	$2,638.62	0
			401451	$38,936.22	0
			401651	$711.25	0
		MDP Total		$42,286.09	0
	200103 Total			$42,551.69	0
	200104	MCP	553000	-$75.51	0
		MCP Total		-$75.51	0
		MDC	510000	-$3.27	0
		MDC Total		-$3.27	0
		MDP	401431	$18,515.85	0
			401451	$1,081.86	0
			401651	$14,019.42	0
		MDP Total		$33,617.13	0
	200104 Total			$33,538.35	0
	200105	25W	506600	-$10.08	0
		25W Total		-$10.08	0
		MCP	553000	$464.47	0
		MCP Total		$464.47	0
		MDC	510000	-$3.27	0
		MDC Total		-$3.27	0
		MDP	401431	$3,121.98	0
			401446	$571.37	0
			401451	-$25.65	0
			401651	$163.20	0
		MDP Total		$3,830.90	0
	200105 Total			$4,282.02	0
	200106	MDC	510000	-$174.20	0
		MDC Total		-$174.20	0
		MDP	401431	$2,473.90	0
			401651	$45,447.81	0
		MDP Total		$47,921.71	0
	200106 Total			$47,747.51	0
	200107	MDC	401431	$812.52	0
			510000	$24.30	0
		MDC Total		$836.82	0
		MDP	401431	$17,649.35	0
			401651	$35,924.38	0
		MDP Total		$53,573.73	0
	200107 Total			$54,410.55	0
	200108	MCP	553000	$1,379.96	0
		MCP Total		$1,379.96	0
		MDC	401431	$451.50	0
		MDC Total		$451.50	0
		MDP	401431	$17,981.53	0

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1430	200108	MDP	401651	$14,579.72	0
		MDP Total		$32,561.25	0
		PW1	401431	$21.89	0
		PW1 Total		$21.89	0
	200108 Total			$34,414.60	0
	200109	MDC	401431	$1,445.40	0
		MDC Total		$1,445.40	0
		MDP	401431	$14,862.28	0
			401651	$12,688.09	0
		MDP Total		$27,550.37	0
	200109 Total			$28,995.77	0
	200110	MDP	401431	$13,667.85	0
			401446	$150.00	0
			401651	$527.04	0
			549000	$95.00	0
		MDP Total		$14,439.89	0
		PW1	401431	$21.89	0
		PW1 Total		$21.89	0
	200110 Total			$14,461.78	0
	200111	MDP	401651	$443.46	0
			548000	$3,432.27	0
			549000	$1,118.78	0
			553000	$4,528.74	0
			554000	$134.90	0
		MDP Total		$9,658.15	0
	200111 Total			$9,658.15	0
	200112	MDC	553000	$40.45	0
		MDC Total		$40.45	0
		MDP	401431	$4.00	0
			549000	$315.98	0
			553000	$2,138.61	0
			554000	$8,758.40	0
		MDP Total		$11,216.99	0
	200112 Total			$11,257.44	0
1430 Total				$302,109.81	0
1440	200101	MDP	401451	$1,650.00	0
		MDP Total		$1,650.00	0
	200101 Total			$1,650.00	0
	200105	MDP	511000	$250.00	0
		MDP Total		$250.00	0
	200105 Total			$250.00	0
	200106	PWO	401661	$2,145.00	0
		PWO Total		$2,145.00	0
	200106 Total			$2,145.00	0
	200107	PWO	401661	$660.00	0
		PWO Total		$660.00	0
	200107 Total			$660.00	0
	200108	PWO	401661	$220.00	0
		PWO Total		$220.00	0
	200108 Total			$220.00	0
	200109	PWO	401661	$12,728.80	0
		PWO Total		$12,728.80	0

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1440	200109 Total			$12,728.80	0
	200110	PWO	401661	$8,800.00	0
		PWO Total		$8,800.00	0
	200110 Total			$8,800.00	0
1440 Total				$26,453.80	0
1460	200101	MDP	401431	$293.45	0
			401631	$125.00	0
		MDP Total		$418.45	0
	200101 Total			$418.45	0
	200102	MDP	401431	$14.00	0
			401631	$33.20	0
		MDP Total		$47.20	0
		SNV	500300	$25.50	0
		SNV Total		$25.50	0
		TE7	401631	$4.65	0
		TE7 Total		$4.65	0
	200102 Total			$77.35	0
	200103	PW1	401431	$100.00	0
		PW1 Total		$100.00	0
		TE7	401631	$237.90	0
		TE7 Total		$237.90	0
	200103 Total			$337.90	0
	200104	PW1	500300	$2.00	0
		PW1 Total		$2.00	0
		TE7	401631	$40.10	0
		TE7 Total		$40.10	0
	200104 Total			$42.10	0
	200105	ARQ	401651	$15.00	0
		ARQ Total		$15.00	0
		CBW	921010	$3.66	0
		CBW Total		$3.66	0
		MDC	401431	$60.50	0
		MDC Total		$60.50	0
		MDP	401431	$65.00	0
		MDP Total		$65.00	0
		PW1	401431	$133.27	0
		PW1 Total		$133.27	0
		TE7	401631	$110.20	0
		TE7 Total		$110.20	0
	200105 Total			$387.63	0
	200106	ARQ	401651	$32.08	0
		ARQ Total		$32.08	0
		CBW	921010	$1.12	0
		CBW Total		$1.12	0
		MDP	401431	$66.00	0
		MDP Total		$66.00	0
		PW1	401431	$237.71	0
		PW1 Total		$237.71	0
		TE7	401631	$4.85	0
		TE7 Total		$4.85	0
	200106 Total			$341.76	0
	200107	MDP	401431	$22.00	0

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1460	200107	MDP Total		$22.00	0
	200107 Total			$22.00	0
	200108	CBE	500300	$15.00	0
			502300	$12.00	0
		CBE Total		$27.00	0
		MDP	401431	$106.35	0
		MDP Total		$106.35	0
		PW1	401431	$224.04	0
			401631	$186.96	0
		PW1 Total		$411.00	0
		TE7	551200	$30.95	0
		TE7 Total		$30.95	0
		TE8	502300	$9.67	0
		TE8 Total		$9.67	0
	200108 Total			$584.97	0
	200109	MDP	401431	$110.72	0
			401631	$467.68	0
		MDP Total		$578.40	0
	200109 Total			$578.40	0
	200110	MDP	401431	$35.13	0
		MDP Total		$35.13	0
	200110 Total			$35.13	0
	200111	ARQ	549200	$44.98	0
		ARQ Total		$44.98	0
		MDP	549000	$70.53	0
		MDP Total		$70.53	0
		SNV	500300	-$25.50	0
		SNV Total		-$25.50	0
	200111 Total			$90.01	0
	200112	MDP	546000	$35.00	0
			549000	$78.65	0
		MDP Total		$113.65	0
	200112 Total			$113.65	0
1460 Total				$3,029.35	0
1470	200101	107	401451	$75.21	0
		107 Total		$75.21	0
		MDP	401431	$521.88	0
			401631	$23.00	0
		MDP Total		$544.88	0
		PW1	401651	$371.46	0
		PW1 Total		$371.46	0
	200101 Total			$991.55	0
	200102	107	401451	$133.52	0
		107 Total		$133.52	0
		MDP	401431	$69.00	0
			401631	$59.00	0
		MDP Total		$128.00	0
		PW1	401651	$422.56	0
		PW1 Total		$422.56	0
		SNV	500300	$194.55	0
		SNV Total		$194.55	0
		TE7	401631	$16.20	0

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1470	200102	TE7 Total		$16.20	0
	200102 Total			$894.83	0
	200103	107	401451	$37.26	0
			401461	$37.26	0
		107 Total		$74.52	0
		MDP	401431	$921.50	0
		MDP Total		$921.50	0
		PW1	401431	$238.33	0
			401631	$274.92	0
			401651	$653.78	0
		PW1 Total		$1,167.03	0
		SNP	500300	$65.21	0
		SNP Total		$65.21	0
		TE7	401631	$684.14	0
		TE7 Total		$684.14	0
	200103 Total			$2,912.40	0
	200104	107	401451	$33.46	0
		107 Total		$33.46	0
		PW1	401651	$358.14	0
			500300	$208.32	0
		PW1 Total		$566.46	0
		TE7	401631	$135.63	0
		TE7 Total		$135.63	0
	200104 Total			$735.55	0
	200105	2RS	401431	$151.80	0
		2RS Total		$151.80	0
		ARQ	401651	$93.90	0
		ARQ Total		$93.90	0
		CBW	921010	$7.44	0
		CBW Total		$7.44	0
		MDC	401631	$29.33	0
		MDC Total		$29.33	0
		MDP	401631	$573.99	0
		MDP Total		$573.99	0
		PW1	401431	$1,107.99	0
			401631	$14.84	0
			500300	$93.15	0
		PW1 Total		$1,215.98	0
		TE7	401631	$650.16	0
		TE7 Total		$650.16	0
	200105 Total			$2,722.60	0
	200106	107	401451	$33.47	0
		107 Total		$33.47	0
		ARQ	401651	$169.02	0
		ARQ Total		$169.02	0
		MDC	401431	$614.00	0
		MDC Total		$614.00	0
		PW1	401431	$2,669.77	0
			401631	$359.40	0
			401651	$209.18	0
		PW1 Total		$3,238.35	0
		TE7	401631	$541.80	0

1470	200106	TE7 Total		$541.80	0
	200106 Total			$4,596.64	0
	200107	PW1	401431	$5,036.15	0
			401651	$735.12	0
		PW1 Total		$5,771.27	0
		TE7	401631	$849.50	0
		TE7 Total		$849.50	0
	200107 Total			$6,620.77	0
	200108	107	401451	$75.21	0
		107 Total		$75.21	0
		CBE	500300	$78.66	0
			502300	$31.74	0
		CBE Total		$110.40	0
		PW1	401431	$327.47	0
			401631	$486.64	0
			401651	$37.50	0
			500000	$28.98	0
		PW1 Total		$880.59	0
		TE7	551200	$135.63	0
		TE7 Total		$135.63	0
		TE8	502300	$52.44	0
		TE8 Total		$52.44	0
	200108 Total			$1,254.27	0
	200109	107	401451	$41.74	0
		107 Total		$41.74	0
		MDP	401631	$361.36	0
			401651	$1,550.00	0
		MDP Total		$1,911.36	0
		PW1	401651	-$153.52	0
		PW1 Total		-$153.52	0
	200109 Total			$1,799.58	0
	200110	107	401451	$115.92	0
		107 Total		$115.92	0
		CBW	500300	$7.80	0
		CBW Total		$7.80	0
		PW1	401431	$26.16	0
		PW1 Total		$26.16	0
		SNP	500300	-$65.21	0
		SNP Total		-$65.21	0
	200110 Total			$84.67	0
	200111	107	401451	$143.86	0
		107 Total		$143.86	0
		ARQ	549200	$23.46	0
		ARQ Total		$23.46	0
		MDP	549000	$64.00	0
		MDP Total		$64.00	0
		SNV	500300	-$194.55	0
		SNV Total		-$194.55	0
	200111 Total			$36.77	0
	200112	107	401451	$36.57	0
		107 Total		$36.57	0
		ARQ	549200	$80.73	0

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1470	200112	ARQ Total		$80.73	0
		MDP	546000	$114.71	0
			549000	$13.10	0
		MDP Total		$127.81	0
		PW1	549000	$18.63	0
		PW1 Total		$18.63	0
	200112 Total			$263.74	0
1470 Total				$22,913.37	0
1480	200101	MDP	401431	-$620.89	0
			401451	$2,958.28	0
		MDP Total		$2,337.39	0
	200101 Total			$2,337.39	0
	200102	MDC	510000	$150.90	0
		MDC Total		$150.90	0
		MDP	401431	$2,109.10	0
			401451	$2,075.40	0
			401651	$4.50	0
		MDP Total		$4,189.00	0
	200102 Total			$4,339.90	0
	200103	MDP	401431	$242.89	0
			401451	$2,193.33	0
		MDP Total		$2,436.22	0
	200103 Total			$2,436.22	0
	200104	MDC	510000	$10.00	0
		MDC Total		$10.00	0
		MDP	401431	$596.67	0
			401451	$1,740.98	0
			401651	$434.93	0
		MDP Total		$2,772.58	0
	200104 Total			$2,782.58	0
	200105	MDC	510000	$26.00	0
		MDC Total		$26.00	0
		MDP	401431	$137.53	0
			401451	$1,885.25	0
			401651	$16.95	0
		MDP Total		$2,039.73	0
	200105 Total			$2,065.73	0
	200106	MDC	510000	$22.31	0
		MDC Total		$22.31	0
		MDP	401431	$183.24	0
			401446	$440.34	0
			401451	$2,040.87	0
			401651	$587.28	0
		MDP Total		$3,251.73	0
		PWO	401661	$172.39	0
		PWO Total		$172.39	0
	200106 Total			$3,446.43	0
	200107	MDC	510000	$38.07	0
		MDC Total		$38.07	0
		MDP	401431	$57.94	0
			401451	$841.29	0
			401651	$355.98	0

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1480	200107	MDP Total		$1,255.21	0
	200107 Total			$1,293.28	0
	200108	MDC	510000	$4.96	0
		MDC Total		$4.96	0
		MDP	401431	$326.95	0
			401451	$55,729.76	0
			401651	$525.23	0
		MDP Total		$56,581.94	0
		PW1	401431	-$1,264.55	0
		PW1 Total		-$1,264.55	0
		PWO	401661	$1,788.73	0
		PWO Total		$1,788.73	0
	200108 Total			$57,111.08	0
	200109	MDC	401431	$450.00	0
		MDC Total		$450.00	0
		MDP	401431	$193.24	0
			401446	$389.20	0
			401451	$48.68	0
			401651	$503.80	0
			401697	$37.87	0
		MDP Total		$1,172.79	0
	200109 Total			$1,622.79	0
	200110	MDP	401431	$1,085.07	0
			401446	$389.20	0
			401451	$128,289.29	0
			401651	$794.36	0
			401697	$37.87	0
			548000	$45.18	0
			549000	$18,435.22	0
		MDP Total		$149,076.19	0
	200110 Total			$149,076.19	0
	200111	MDC	553000	$18.75	0
		MDC Total		$18.75	0
		MDP	401431	$398.24	0
			401451	$3,202.26	0
			401461	$34.01	0
			417210	$1,155.28	0
			549000	$437.71	0
			553000	$14.63	0
			554000	$358.82	0
		MDP Total		$5,600.95	0
		PWO	549200	$750.60	0
		PWO Total		$750.60	0
	200111 Total			$6,370.30	0
	200112	MDC	553000	$24.94	0
		MDC Total		$24.94	0
		MDP	401431	-$3.49	0
			401461	$43.82	0
			408110	$421,666.50	0
			548000	$52.85	0
			549000	$16,857.45	0
			553000	$318.77	0

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1480	200112	MDP	554000	$642.80	0
		MDP Total		$439,578.70	0
	200112 Total			$439,603.64	0
1480 Total				$672,485.53	0
1500	200101	MDP	401451	-$12,362.70	0
		MDP Total		-$12,362.70	0
	200101 Total			$12,362.70	0
	200108	MDC	510000	$1,340,654.11	0
		MDC Total		$1,340,654.11	0
	200108 Total			$1,340,654.11	0
	200109	MDP	548500	$31,546.00	0
		MDP Total		$31,546.00	0
	200109 Total			$31,546.00	0
	200110	MDP	548500	$31,546.00	0
			548621	$242,807.55	0
		MDP Total		$274,353.55	0
		PWO	401661	-$24,553.80	0
		PWO Total		-$24,553.80	0
	200110 Total			$249,799.75	0
	200111	MDP	548500	$41,834.12	0
			548621	$11,213.27	0
			548625	$18,750.00	0
			549000	$4,772.35	0
		MDP Total		$76,569.74	0
	200111 Total			$76,569.74	0
	200112	MDP	401685	-$1,335,987.78	0
			548500	$37,812.63	0
			548625	$6,250.00	0
			549000	$5,557.30	0
			553000	$8,301.65	0
		MDP Total		-$1,278,066.20	0
		PW1	553000	-$19,458.95	0
		PW1 Total		-$19,458.95	0
	200112 Total			-$1,297,525.15	0
1500 Total				$388,681.75	0
1610	200101	MDP	401446	$398.79	0
			401497	-$398.79	0
			401651	$398.79	0
		MDP Total		$398.79	0
	200101 Total			$398.79	0
	200102	MDP	401446	$1,293.17	0
			401497	-$1,293.17	0
			401651	$1,293.17	0
		MDP Total		$1,293.17	0
	200102 Total			$1,293.17	0
	200103	111	401651	-$37.87	0
		111 Total		-$37.87	0
		MDP	401446	$389.20	0
			401497	-$389.20	0
			401651	$427.07	0
		MDP Total		$427.07	0
	200103 Total			$389.20	0

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1610	200104	111	401651	-$37.87	0
		111 Total		-$37.87	0
		MDP	401446	$389.20	0
			401497	-$389.20	0
			401651	$427.07	0
		MDP Total		$427.07	0
	200104 Total			$389.20	0
	200105	111	401651	-$37.87	0
		111 Total		-$37.87	0
		MDP	401446	$389.20	0
			401497	-$389.20	0
			401651	$427.07	0
		MDP Total		$427.07	0
	200105 Total			$389.20	0
	200106	111	401651	-$37.87	0
		111 Total		-$37.87	0
		MDP	401446	$389.20	0
			401497	-$389.20	0
			401651	$427.07	0
		MDP Total		$427.07	0
	200106 Total			$389.20	0
	200107	111	401651	-$37.87	0
		111 Total		-$37.87	0
		MDP	401446	$389.20	0
			401497	-$389.20	0
			401651	$427.07	0
		MDP Total		$427.07	0
	200107 Total			$389.20	0
	200108	111	401651	-$37.87	0
		111 Total		-$37.87	0
		MDP	401446	$389.20	0
			401497	-$389.20	0
			401651	$427.07	0
		MDP Total		$427.07	0
	200108 Total			$389.20	0
1610 Total				$4,027.16	0
Grand Total				$1,102,179.40	13,529

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FRT - v 3.00.0054
5/12/03 1:17 pm

Work_Type_De	(All)
Report_to_Cen	(All)
Process_Id_De	(All)
Corporation_De	(All)
Corporation	(All)
Center_type	(All)
Center_Descrip	(All)
BusinessSegm	(All)
BusinessSegm	(All)
Account_type	(All)
ProcessID	(All)

Madison - 2002

Actuals

Resource	Accounting_Period	Center	Account	Account_Description	$ and Units Amount	Quantity
1000	200201	191	546000	Other Power - Oper Sup & Eng	$373.95	4
		191 Total			$373.95	4
		25W	549000	Other Power - Oper Misc Exp	$530.09	16
		25W Total			$530.09	16
		ARQ	549000	Other Power - Oper Misc Exp	$301.10	10
			549200	MISC OTH PWR GE - SALARY & WAG	$50.20	2
		ARQ Total			$351.30	11
		CBW	510200	MTCE SUPV & ENGR - SALARY & WA	$11.74	0
		CBW Total			$11.74	0
		ECE	401484	EC NONREG CHARGES - LABOR	$1,135.71	31
		ECE Total			$1,135.71	31
		POF	546000	Other Power - Oper Sup & Eng	$439.88	4
		POF Total			$439.88	4
		PW1	546000	Other Power - Oper Sup & Eng	$14,624.29	268
			548000	Other Power - Oper Gen Exp	$2,496.81	59
			548210	3PT - Other Pwr - Op Gen Exp	$2,417.59	58
			549000	Other Power - Oper Misc Exp	$4,751.47	128
			551000	Other Power - Mtc Supv & Eng	$3,251.26	70
			552000	Other Power - Mtc Structures	$375.96	9
			553000	Oth Pwr - Mtc Gen Elec Equip	$4,417.00	106
			554000	Other Pwr - Mtc Misc Exp	$5,225.53	125
		PW1 Total			$37,559.91	822
	200201 Total				$40,402.58	888
	200202	107	549000	Other Power - Oper Misc Exp	$131.43	3
		107 Total			$131.43	3
		191	546000	Other Power - Oper Sup & Eng	$378.99	4
		191 Total			$378.99	4
		25W	549000	Other Power - Oper Misc Exp	$390.60	12
		25W Total			$390.60	12
		ARQ	549000	Other Power - Oper Misc Exp	$545.72	14
		ARQ Total			$545.72	14
		ECE	401484	EC NONREG CHARGES - LABOR	$216.33	6
			549000	Other Power - Oper Misc Exp	-$216.33	0
		ECE Total			$.00	6
		POF	546000	Other Power - Oper Sup & Eng	$484.99	3
		POF Total			$484.99	3
		PW1	546000	Other Power - Oper Sup & Eng	$15,005.26	241
			548000	Other Power - Oper Gen Exp	$11,735.54	219
			548210	3PT - Other Pwr - Op Gen Exp	-$2,046.30	-50
			549000	Other Power - Oper Misc Exp	$2,409.37	69
			551000	Other Power - Mtc Supv & Eng	$2,153.62	40
			552000	Other Power - Mtc Structures	$1,354.58	32
			553000	Oth Pwr - Mtc Gen Elec Equip	$5,457.35	128
			554000	Other Pwr - Mtc Misc Exp	$4,691.50	110
		PW1 Total			$40,760.92	788
		TE7	546000	Other Power - Oper Sup & Eng	$1,712.24	28

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					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1000	200202	TE7	549000	Other Power - Oper Misc Exp	$477.70	8
		TE7 Total			$2,189.94	36
	200202 Total				$44,882.59	866
	200203	107	549000	Other Power - Oper Misc Exp	$49.35	1
		107 Total			$49.35	1
		191	546000	Other Power - Oper Sup & Eng	$375.39	4
		191 Total			$375.39	4
		25W	549000	Other Power - Oper Misc Exp	$3,019.03	65
		25W Total			$3,019.03	65
		ARQ	549000	Other Power - Oper Misc Exp	$376.63	11
		ARQ Total			$376.63	11
		ECE	401484	EC NONREG CHARGES - LABOR	-$1,352.44	-36
			549000	Other Power - Oper Misc Exp	$216.33	0
			920010	A&G Salaries & Wages	$270.50	7
		ECE Total			-$865.61	-29
		POF	546000	Other Power - Oper Sup & Eng	$489.10	4
		POF Total			$489.10	4
		PW1	546000	Other Power - Oper Sup & Eng	$17,404.94	278
			548000	Other Power - Oper Gen Exp	$4,128.36	138
			549000	Other Power - Oper Misc Exp	$2,343.34	67
			551000	Other Power - Mtc Supv & Eng	$2,709.57	52
			552000	Other Power - Mtc Structures	$129.12	2
			553000	Oth Pwr - Mtc Gen Elec Equip	$2,803.21	62
			554000	Other Pwr - Mtc Misc Exp	$2,645.90	58
		PW1 Total			$32,164.44	658
		TE7	546000	Other Power - Oper Sup & Eng	$8,604.76	15
		TE7 Total			$8,604.76	15
		TEF	546000	Other Power - Oper Sup & Eng	$10,294.67	0
			549000	Other Power - Oper Misc Exp	$319.58	10
		TEF Total			$10,614.25	10
	200203 Total				$54,827.34	738
	200204	191	546000	Other Power - Oper Sup & Eng	$376.64	4
		191 Total			$376.64	4
		25W	549000	Other Power - Oper Misc Exp	$1,416.49	33
		25W Total			$1,416.49	33
		ARQ	549000	Other Power - Oper Misc Exp	$390.71	11
		ARQ Total			$390.71	11
		ECE	401484	EC NONREG CHARGES - LABOR	$.26	0
			401696	Alloc fr CinServ - A&G Labor	-$1,351.06	0
			920010	A&G Salaries & Wages	$1,350.80	0
		ECE Total			$.00	0
		POF	546000	Other Power - Oper Sup & Eng	$551.12	4
		POF Total			$551.12	4
		PV7	549200	MISC OTH PWR GE - SALARY & WAG	$103.49	3
		PV7 Total			$103.49	3
		PW1	546000	Other Power - Oper Sup & Eng	$15,563.83	265
			548000	Other Power - Oper Gen Exp	$5,254.32	115
			549000	Other Power - Oper Misc Exp	$2,883.08	80
			551000	Other Power - Mtc Supv & Eng	$2,086.00	43
			552000	Other Power - Mtc Structures	$1,615.98	36
			553000	Oth Pwr - Mtc Gen Elec Equip	$3,467.05	75
			554000	Other Pwr - Mtc Misc Exp	$3,490.40	78
		PW1 Total			$34,360.66	691
		TE7	546000	Other Power - Oper Sup & Eng	$1,513.21	23
		TE7 Total			$1,513.21	23
	200204 Total				$38,712.32	768
	200205	107	549000	Other Power - Oper Misc Exp	$98.59	2
		107 Total			$98.59	2
		191	546000	Other Power - Oper Sup & Eng	$385.74	4
		191 Total			$385.74	4
		25W	549000	Other Power - Oper Misc Exp	$1,439.42	35
		25W Total			$1,439.42	35
		ARQ	549000	Other Power - Oper Misc Exp	$1,143.46	31

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					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1000	200205	ARQ Total			$1,143.46	31
		POF	546000	Other Power - Oper Sup & Eng	$482.22	4
		POF Total			$482.22	4
		PW1	546000	Other Power - Oper Sup & Eng	$14,168.36	262
			548000	Other Power - Oper Gen Exp	$5,175.35	111
			549000	Other Power - Oper Misc Exp	$3,714.14	100
			551000	Other Power - Mtc Supv & Eng	$1,871.94	40
			552000	Other Power - Mtc Structures	$236.50	6
			553000	Oth Pwr - Mtc Gen Elec Equip	$12,053.15	263
			554000	Other Pwr - Mtc Misc Exp	$2,640.95	61
		PW1 Total			$39,860.39	843
		TE7	546000	Other Power - Oper Sup & Eng	$388.02	6
		TE7 Total			$388.02	6
	200205 Total				$43,797.84	925
	200206	107	549000	Other Power - Oper Misc Exp	$406.66	9
		107 Total			$406.66	9
		191	546000	Other Power - Oper Sup & Eng	$389.55	4
		191 Total			$389.55	4
		25W	549000	Other Power - Oper Misc Exp	$1,415.96	31
		25W Total			$1,415.96	31
		ARQ	549000	Other Power - Oper Misc Exp	$538.01	13
		ARQ Total			$538.01	13
		POF	546000	Other Power - Oper Sup & Eng	$453.44	2
		POF Total			$453.44	2
		PW1	546000	Other Power - Oper Sup & Eng	$12,680.83	200
			548000	Other Power - Oper Gen Exp	$23,330.19	501
			549000	Other Power - Oper Misc Exp	$1,450.73	41
			551000	Other Power - Mtc Supv & Eng	$2,298.11	42
			552000	Other Power - Mtc Structures	$3,476.30	77
			553000	Oth Pwr - Mtc Gen Elec Equip	$3,652.11	78
			554000	Other Pwr - Mtc Misc Exp	$5,687.23	127
		PW1 Total			$52,575.50	1,065
		TEF	553000	Oth Pwr - Mtc Gen Elec Equip	$330.36	8
		TEF Total			$330.36	8
	200206 Total				$56,109.48	1,132
	200207	107	549000	Other Power - Oper Misc Exp	$443.25	9
		107 Total			$443.25	9
		191	546000	Other Power - Oper Sup & Eng	$384.59	4
		191 Total			$384.59	4
		25W	549000	Other Power - Oper Misc Exp	$1,062.68	27
		25W Total			$1,062.68	27
		ARQ	549000	Other Power - Oper Misc Exp	$3,744.60	86
		ARQ Total			$3,744.60	86
		CBE	514000	MAINT MISC STEAM PLANT	$334.28	8
			553000	Oth Pwr - Mtc Gen Elec Equip	$81.41	2
		CBE Total			$415.69	10
		CBW	553000	Oth Pwr - Mtc Gen Elec Equip	$2,561.18	43
		CBW Total			$2,561.18	43
		POF	546000	Other Power - Oper Sup & Eng	$432.60	2
		POF Total			$432.60	2
		PW1	546000	Other Power - Oper Sup & Eng	$17,129.34	313
			548000	Other Power - Oper Gen Exp	$32,825.56	662
			549000	Other Power - Oper Misc Exp	$1,692.43	52
			551000	Other Power - Mtc Supv & Eng	$2,747.81	58
			552000	Other Power - Mtc Structures	$44.55	1
			553000	Oth Pwr - Mtc Gen Elec Equip	$5,365.19	118
			554000	Other Pwr - Mtc Misc Exp	$2,910.47	64
		PW1 Total			$62,715.35	1,267
		TE7	546000	Other Power - Oper Sup & Eng	$2,867.89	44
		TE7 Total			$2,867.89	44
		TEF	553000	Oth Pwr - Mtc Gen Elec Equip	-$330.36	-8
		TEF Total			-$330.36	-8
	200207 Total				$74,297.47	1,484

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					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1000	200208	107	549000	Other Power - Oper Misc Exp	$203.90	4
		107 Total			$203.90	4
		191	546000	Other Power - Oper Sup & Eng	$398.50	4
		191 Total			$398.50	4
		25W	549000	Other Power - Oper Misc Exp	$1,485.56	35
		25W Total			$1,485.56	35
		ARQ	549000	Other Power - Oper Misc Exp	$1,721.62	36
		ARQ Total			$1,721.62	36
		POF	546000	Other Power - Oper Sup & Eng	$297.30	1
		POF Total			$297.30	1
		PW1	546000	Other Power - Oper Sup & Eng	$15,518.30	272
			548000	Other Power - Oper Gen Exp	$33,883.97	712
			549000	Other Power - Oper Misc Exp	$2,057.99	58
			551000	Other Power - Mtc Supv & Eng	$3,183.41	64
			552000	Other Power - Mtc Structures	$487.25	11
			553000	Oth Pwr - Mtc Gen Elec Equip	$6,038.46	120
			553210	3PT - Oth Pwr - Mtc Gen El Eq	$238.75	5
			554000	Other Pwr - Mtc Misc Exp	$4,771.55	94
		PW1 Total			$66,179.68	1,334
		TE7	546000	Other Power - Oper Sup & Eng	$1,498.09	24
		TE7 Total			$1,498.09	24
		TEF	552000	Other Power - Mtc Structures	$523.34	16
			553000	Oth Pwr - Mtc Gen Elec Equip	$545.86	16
		TEF Total			$1,069.20	32
	200208 Total				$72,853.85	1,471
	200209	107	549000	Other Power - Oper Misc Exp	$108.68	2
		107 Total			$108.68	2
		191	546000	Other Power - Oper Sup & Eng	$374.32	4
		191 Total			$374.32	4
		25W	549000	Other Power - Oper Misc Exp	$1,172.24	27
		25W Total			$1,172.24	27
		ARQ	549000	Other Power - Oper Misc Exp	$2,716.47	82
		ARQ Total			$2,716.47	82
		CBE	514000	MAINT MISC STEAM PLANT	$490.58	12
		CBE Total			$490.58	12
		CBW	553000	Oth Pwr - Mtc Gen Elec Equip	$451.90	8
		CBW Total			$451.90	8
		POF	546000	Other Power - Oper Sup & Eng	$317.50	2
		POF Total			$317.50	2
		PW1	546000	Other Power - Oper Sup & Eng	$14,532.02	237
			548000	Other Power - Oper Gen Exp	$18,207.69	388
			549000	Other Power - Oper Misc Exp	$2,175.74	60
			551000	Other Power - Mtc Supv & Eng	$1,447.67	28
			552000	Other Power - Mtc Structures	$5,686.67	131
			553000	Oth Pwr - Mtc Gen Elec Equip	$4,020.77	86
			554000	Other Pwr - Mtc Misc Exp	$2,531.50	55
		PW1 Total			$48,602.06	984
		TE7	546000	Other Power - Oper Sup & Eng	$523.78	8
		TE7 Total			$523.78	8
	200209 Total				$54,757.53	1,129
	200210	107	549000	Other Power - Oper Misc Exp	$369.68	8
		107 Total			$369.68	8
		191	546000	Other Power - Oper Sup & Eng	$402.70	5
		191 Total			$402.70	5
		25W	549000	Other Power - Oper Misc Exp	$1,415.69	33
		25W Total			$1,415.69	33
		ARQ	549000	Other Power - Oper Misc Exp	$1,505.96	44
		ARQ Total			$1,505.96	44
		CBW	553000	Oth Pwr - Mtc Gen Elec Equip	$1,787.44	40
		CBW Total			$1,787.44	40
		POF	546000	Other Power - Oper Sup & Eng	$453.72	2
		POF Total			$453.72	2
		PW1	546000	Other Power - Oper Sup & Eng	$13,435.92	244

					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1000	200210	PW1	548000	Other Power - Oper Gen Exp	$5,970.12	135
			549000	Other Power - Oper Misc Exp	$1,403.04	44
			551000	Other Power - Mtc Supv & Eng	$2,483.33	52
			552000	Other Power - Mtc Structures	$5,093.71	106
			552210	3PT - Other Pwr - Mtc Structr	$43.27	1
			553000	Oth Pwr - Mtc Gen Elec Equip	$6,323.94	142
			554000	Other Pwr - Mtc Misc Exp	$2,382.77	54
		PW1 Total			$37,136.10	778
		TE7	546000	Other Power - Oper Sup & Eng	$258.66	4
		TE7 Total			$258.66	4
	200210 Total				$43,329.95	914
	200211	107	549000	Other Power - Oper Misc Exp	$98.59	2
		107 Total			$98.59	2
		191	546000	Other Power - Oper Sup & Eng	$355.23	4
		191 Total			$355.23	4
		25W	549000	Other Power - Oper Misc Exp	$1,247.93	29
		25W Total			$1,247.93	29
		ARQ	549000	Other Power - Oper Misc Exp	$1,049.02	29
		ARQ Total			$1,049.02	29
		POF	546000	Other Power - Oper Sup & Eng	$385.51	2
		POF Total			$385.51	2
		PW1	546000	Other Power - Oper Sup & Eng	$9,671.42	162
			548000	Other Power - Oper Gen Exp	$8,197.55	178
			549000	Other Power - Oper Misc Exp	$2,352.62	66
			551000	Other Power - Mtc Supv & Eng	$2,863.80	55
			552000	Other Power - Mtc Structures	$855.73	19
			553000	Oth Pwr - Mtc Gen Elec Equip	$48,050.16	1,077
			553210	3PT - Oth Pwr - Mtc Gen El Eq	$782.17	17
			554000	Other Pwr - Mtc Misc Exp	$2,452.39	56
			570000	MAINTENANCE OF STATION EQUIPME	$287.47	6
		PW1 Total			$75,513.31	1,635
		TE7	546000	Other Power - Oper Sup & Eng	$118.55	2
		TE7 Total			$118.55	2
	200211 Total				$78,768.14	1,703
	200212	107	549000	Other Power - Oper Misc Exp	$162.67	3
		107 Total			$162.67	3
		191	546000	Other Power - Oper Sup & Eng	$361.61	4
		191 Total			$361.61	4
		25W	549000	Other Power - Oper Misc Exp	$1,050.12	28
		25W Total			$1,050.12	28
		ARQ	549000	Other Power - Oper Misc Exp	$358.99	10
		ARQ Total			$358.99	10
		POF	546000	Other Power - Oper Sup & Eng	$317.42	2
		POF Total			$317.42	2
		PW1	546000	Other Power - Oper Sup & Eng	$10,136.81	177
			548000	Other Power - Oper Gen Exp	$15,984.73	357
			549000	Other Power - Oper Misc Exp	$1,845.44	52
			551000	Other Power - Mtc Supv & Eng	$1,982.57	41
			552000	Other Power - Mtc Structures	$34.39	2
			553000	Oth Pwr - Mtc Gen Elec Equip	$624.50	14
			554000	Other Pwr - Mtc Misc Exp	$2,877.37	60
			570000	MAINTENANCE OF STATION EQUIPME	$1,923.02	44
		PW1 Total			$35,408.83	746
		TE7	546000	Other Power - Oper Sup & Eng	$468.94	7
		TE7 Total			$468.94	7
	200212 Total				$38,128.58	800
1000 Total					$640,867.67	12,818
1050	200202	PW1	548000	Other Power - Oper Gen Exp	$19.88	0
			548210	3PT - Other Pwr - Op Gen Exp	$19.89	0
		PW1 Total			$39.77	0
	200202 Total				$39.77	0
	200203	PW1	546000	Other Power - Oper Sup & Eng	$49.72	0
			548000	Other Power - Oper Gen Exp	$129.26	0

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					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1050	200203	PW1 Total			$178.98	0
	200203 Total				$178.98	0
	200204	PW1	548000	Other Power - Oper Gen Exp	$109.39	0
		PW1 Total			$109.39	0
	200204 Total				$109.39	0
	200205	PW1	553000	Oth Pwr - Mtc Gen Elec Equip	$119.34	0
		PW1 Total			$119.34	0
	200205 Total				$119.34	0
	200206	PW1	548000	Other Power - Oper Gen Exp	$69.61	0
			549000	Other Power - Oper Misc Exp	$43.46	0
		PW1 Total			$113.07	0
	200206 Total				$113.07	0
	200207	CBW	553000	Oth Pwr - Mtc Gen Elec Equip	$9.94	0
		CBW Total			$9.94	0
		PW1	546000	Other Power - Oper Sup & Eng	$59.66	0
			548000	Other Power - Oper Gen Exp	$39.77	0
		PW1 Total			$99.43	0
	200207 Total				$109.37	0
	200208	PW1	546000	Other Power - Oper Sup & Eng	$49.72	0
			548000	Other Power - Oper Gen Exp	$198.87	0
			554000	Other Pwr - Mtc Misc Exp	$9.94	0
		PW1 Total			$258.53	0
	200208 Total				$258.53	0
	200209	191	546000	Other Power - Oper Sup & Eng	$93.77	0
		191 Total			$93.77	0
		CBE	514000	MAINT MISC STEAM PLANT	$9.94	0
		CBE Total			$9.94	0
		POF	546000	Other Power - Oper Sup & Eng	$93.91	0
		POF Total			$93.91	0
		PW1	546000	Other Power - Oper Sup & Eng	$826.69	0
			548000	Other Power - Oper Gen Exp	$178.99	0
			549000	Other Power - Oper Misc Exp	$9.94	0
		PW1 Total			$1,015.62	0
	200209 Total				$1,213.24	0
	200210	191	546000	Other Power - Oper Sup & Eng	$2.62	0
		191 Total			$2.62	0
		POF	546000	Other Power - Oper Sup & Eng	$2.63	0
		POF Total			$2.63	0
		PW1	546000	Other Power - Oper Sup & Eng	-$498.99	0
			548000	Other Power - Oper Gen Exp	$119.33	0
			552000	Other Power - Mtc Structures	$9.94	0
		PW1 Total			-$369.72	0
	200210 Total				-$364.47	0
	200211	PW1	548000	Other Power - Oper Gen Exp	$89.49	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$109.37	0
		PW1 Total			$198.86	0
	200211 Total				$198.86	0
	200212	PW1	548000	Other Power - Oper Gen Exp	$228.71	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$9.94	0
		PW1 Total			$238.65	0
	200212 Total				$238.65	0
1050 Total					$2,214.73	0
1080	200206	PW1	549000	Other Power - Oper Misc Exp	$69.88	0
		PW1 Total			$69.88	0
	200206 Total				$69.88	0
1080 Total					$69.88	0
1200	200201	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	-$2,106.80	0
		MDC Total			-$2,106.80	0
		MDP	549000	Other Power - Oper Misc Exp	$72.79	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$1,412.37	0
		MDP Total			$1,485.16	0
	200201 Total				-$621.64	0
	200202	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	$186,496.97	0

Materials

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					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1200	200202	MDC Total			$186,496.97	0
		MDP	549000	Other Power - Oper Misc Exp	$51.76	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$75.06	0
		MDP Total			$126.82	0
	200202 Total				$186,623.79	0
	200203	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	$948.10	0
		MDC Total			$948.10	0
		MDP	553000	Oth Pwr - Mtc Gen Elec Equip	-$820,572.54	0
		MDP Total			-$820,572.54	0
	200203 Total				-$819,624.44	0
	200204	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	$65,934.00	0
		MDC Total			$65,934.00	0
		MDP	548000	Other Power - Oper Gen Exp	$31.56	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$263.73	0
		MDP Total			$295.29	0
	200204 Total				$66,229.29	0
	200205	MDP	553000	Oth Pwr - Mtc Gen Elec Equip	$458.11	0
		MDP Total			$458.11	0
	200205 Total				$458.11	0
	200206	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	-$25.10	0
		MDC Total			-$25.10	0
		MDP	549000	Other Power - Oper Misc Exp	$79.84	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$12,598.45	0
		MDP Total			$12,678.29	0
	200206 Total				$12,653.19	0
	200207	MDP	549000	Other Power - Oper Misc Exp	$60.13	0
			553000	Oth Pwr - Mtc Gen Elec Equip	-$18,841.60	0
		MDP Total			-$18,781.47	0
	200207 Total				-$18,781.47	0
	200208	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	-$108.54	0
		MDC Total			-$108.54	0
		MDP	549000	Other Power - Oper Misc Exp	$620.00	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$6,243.93	0
		MDP Total			$6,863.93	0
	200208 Total				$6,755.39	0
	200209	MDP	553000	Oth Pwr - Mtc Gen Elec Equip	$4,593.87	0
		MDP Total			$4,593.87	0
		PW1	553000	Oth Pwr - Mtc Gen Elec Equip	$77.37	0
		PW1 Total			$77.37	0
	200209 Total				$4,671.24	0
	200210	MDP	548000	Other Power - Oper Gen Exp	$196.19	0
			553000	Oth Pwr - Mtc Gen Elec Equip	-$1,141.64	0
		MDP Total			-$945.45	0
	200210 Total				-$945.45	0
	200211	MDP	549000	Other Power - Oper Misc Exp	$171.86	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$729.35	0
		MDP Total			$901.21	0
	200211 Total				$901.21	0
	200212	MDP	549000	Other Power - Oper Misc Exp	$9.33	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$780.93	0
		MDP Total			$790.26	0
	200212 Total				$790.26	0
1200 Total					-$560,890.52	0
1300	200202	TE7	546000	Other Power - Oper Sup & Eng	$28.00	0
		TE7 Total			$28.00	0
	200202 Total				$28.00	0
	200203	TE2	546000	Other Power - Oper Sup & Eng	$24.00	0
		TE2 Total			$24.00	0
	200203 Total				$24.00	0
	200204	TE7	546000	Other Power - Oper Sup & Eng	$20.93	0
		TE7 Total			$20.93	0
	200204 Total				$20.93	0
	200205	TE7	546000	Other Power - Oper Sup & Eng	$13.95	0

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					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1300	200205	TE7 Total			$13.95	0
	200205 Total				$13.95	0
	200206	TE7	546000	Other Power - Oper Sup & Eng	$79.05	0
		TE7 Total			$79.05	0
	200206 Total				$79.05	0
	200207	TE7	546000	Other Power - Oper Sup & Eng	$134.00	0
		TE7 Total			$134.00	0
	200207 Total				$134.00	0
	200209	TE7	546000	Other Power - Oper Sup & Eng	$22.00	0
		TE7 Total			$22.00	0
	200209 Total				$22.00	0
	200211	TE7	546000	Other Power - Oper Sup & Eng	$34.88	0
		TE7 Total			$34.88	0
	200211 Total				$34.88	0
	200212	TE7	546000	Other Power - Oper Sup & Eng	$41.85	0
		TE7 Total			$41.85	0
	200212 Total				$41.85	0
1300 Total					$398.66	0
1410	200201	MDP	548000	Other Power - Oper Gen Exp	$300.00	0
			549000	Other Power - Oper Misc Exp	$8,843.03	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$215.59	0
			554000	Other Pwr - Mtc Misc Exp	$790.00	0
		MDP Total			$10,148.62	0
	200201 Total				$10,148.62	0
	200202	MDP	548000	Other Power - Oper Gen Exp	$1,600.00	0
			549000	Other Power - Oper Misc Exp	$1,938.16	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$5,856.02	0
			554000	Other Pwr - Mtc Misc Exp	$395.00	0
		MDP Total			$9,789.18	0
	200202 Total				$9,789.18	0
	200203	MDP	549000	Other Power - Oper Misc Exp	$6,124.79	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$1,192.48	0
			554000	Other Pwr - Mtc Misc Exp	$790.00	0
		MDP Total			$8,107.27	0
	200203 Total				$8,107.27	0
	200204	ARQ	549000	Other Power - Oper Misc Exp	$95.70	0
		ARQ Total			$95.70	0
		MDP	401431	SALARIES & BENEFITS - ELECTRIC	-$499.66	0
			549000	Other Power - Oper Misc Exp	$3,046.32	0
			552000	Other Power - Mtc Structures	$1,200.00	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$5,008.30	0
			554000	Other Pwr - Mtc Misc Exp	$1,165.00	0
		MDP Total			$9,919.96	0
	200204 Total				$10,015.66	0
	200205	MDP	549000	Other Power - Oper Misc Exp	$2,683.88	0
			552000	Other Power - Mtc Structures	$1,600.00	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$428.17	0
			554000	Other Pwr - Mtc Misc Exp	$790.00	0
		MDP Total			$5,502.05	0
	200205 Total				$5,502.05	0
	200206	ARQ	549000	Other Power - Oper Misc Exp	$122.12	0
		ARQ Total			$122.12	0
		MDP	549000	Other Power - Oper Misc Exp	$1,198.60	0
			552000	Other Power - Mtc Structures	$5,884.81	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$286.92	0
			554000	Other Pwr - Mtc Misc Exp	$2,190.00	0
		MDP Total			$9,560.33	0
	200206 Total				$9,682.45	0
	200207	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	$243.84	0
		MDC Total			$243.84	0
		MDP	549000	Other Power - Oper Misc Exp	$25,846.50	0
			552000	Other Power - Mtc Structures	$1,550.00	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$11,584.56	0

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					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1410	200207	MDP	554000	Other Pwr - Mtc Misc Exp	$600.00	0
		MDP Total			$39,581.06	0
	200207 Total				$39,824.90	0
	200208	MDP	549000	Other Power - Oper Misc Exp	$1,610.88	0
			552000	Other Power - Mtc Structures	$800.00	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$6,970.87	0
			554000	Other Pwr - Mtc Misc Exp	$2,650.00	0
		MDP Total			$12,031.75	0
	200208 Total				$12,031.75	0
	200209	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	$2,958.50	0
		MDC Total			$2,958.50	0
		MDP	548000	Other Power - Oper Gen Exp	$5,195.00	0
			549000	Other Power - Oper Misc Exp	$8,810.88	0
			552000	Other Power - Mtc Structures	$6,430.26	0
			553000	Oth Pwr - Mtc Gen Elec Equip	-$3,486.55	0
			554000	Other Pwr - Mtc Misc Exp	-$6,020.00	0
		MDP Total			$10,929.59	0
	200209 Total				$13,888.09	0
	200210	ARQ	549000	Other Power - Oper Misc Exp	$49.25	0
		ARQ Total			$49.25	0
		MDP	549000	Other Power - Oper Misc Exp	$2,950.01	0
			552000	Other Power - Mtc Structures	$19,180.77	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$17,999.81	0
			554000	Other Pwr - Mtc Misc Exp	$1,175.00	0
		MDP Total			$41,305.59	0
	200210 Total				$41,354.84	0
	200211	380	553000	MAINTENANCE OF GENERATING AND	$843.48	0
		380 Total			$843.48	0
		MAD	553000	Oth Pwr - Mtc Gen Elec Equip	$24,337.76	0
		MAD Total			$24,337.76	0
		MDC	553000	Oth Pwr - Mtc Gen Elec Equip	-$2,958.50	0
		MDC Total			-$2,958.50	0
		MDP	549000	Other Power - Oper Misc Exp	$5,370.72	0
			552000	Other Power - Mtc Structures	$79,377.03	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$45,618.40	0
			554000	Other Pwr - Mtc Misc Exp	$675.00	0
		MDP Total			$131,041.15	0
	200211 Total				$153,263.89	0
	200212	380	553000	MAINTENANCE OF GENERATING AND	$1,795.20	0
		380 Total			$1,795.20	0
		ARQ	549000	Other Power - Oper Misc Exp	$49.25	0
		ARQ Total			$49.25	0
		MAD	553000	Oth Pwr - Mtc Gen Elec Equip	-$24,337.76	0
		MAD Total			-$24,337.76	0
		MDP	548000	Other Power - Oper Gen Exp	$395.00	0
			549000	Other Power - Oper Misc Exp	$2,534.18	0
			552000	Other Power - Mtc Structures	$401.25	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$48,012.14	0
			554000	Other Pwr - Mtc Misc Exp	$1,525.00	0
		MDP Total			$52,867.57	0
	200212 Total				$30,374.26	0
1410 Total					$343,982.96	0
1420	200201	MDP	548000	Other Power - Oper Gen Exp	-$2,000.00	0
			549000	Other Power - Oper Misc Exp	$1,109.02	0
			553000	Oth Pwr - Mtc Gen Elec Equip	-$2,390.14	0
		MDP Total			-$3,281.12	0
	200201 Total				-$3,281.12	0
	200202	MDC	549000	Other Power - Oper Misc Exp	$2,431.89	0
		MDC Total			$2,431.89	0
		MDP	548000	Other Power - Oper Gen Exp	$1,600.00	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$1,330.30	0
		MDP Total			$2,930.30	0
	200202 Total				$5,362.19	0

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					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1420	200203	MDP	553000	Oth Pwr - Mtc Gen Elec Equip	$1,192.46	0
		MDP Total			$1,192.46	0
	200203 Total				$1,192.46	0
	200204	MDP	401431	SALARIES & BENEFITS - ELECTRIC	-$499.66	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$508.29	0
		MDP Total			$8.63	0
	200204 Total				$8.63	0
	200205	MDP	553000	Oth Pwr - Mtc Gen Elec Equip	$341.25	0
		MDP Total			$341.25	0
	200205 Total				$341.25	0
	200206	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	$2,039.38	0
		MDC Total			$2,039.38	0
	200206 Total				$2,039.38	0
	200207	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	-$2,039.38	0
		MDC Total			-$2,039.38	0
		MDP	553000	Oth Pwr - Mtc Gen Elec Equip	$1,054.69	0
		MDP Total			$1,054.69	0
	200207 Total				-$984.69	0
	200208	MDP	553000	Oth Pwr - Mtc Gen Elec Equip	$5,236.59	0
		MDP Total			$5,236.59	0
	200208 Total				$5,236.59	0
	200209	MDP	552000	Other Power - Mtc Structures	$3,227.96	0
			553000	Oth Pwr - Mtc Gen Elec Equip	-$2,462.22	0
		MDP Total			$765.74	0
	200209 Total				$765.74	0
	200210	MDP	549000	Other Power - Oper Misc Exp	$1,867.34	0
			552000	Other Power - Mtc Structures	$1,083.02	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$9,162.75	0
		MDP Total			$12,113.11	0
	200210 Total				$12,113.11	0
	200211	MDP	552000	Other Power - Mtc Structures	$3,397.34	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$1,874.97	0
		MDP Total			$5,272.31	0
	200211 Total				$5,272.31	0
	200212	MDP	552000	Other Power - Mtc Structures	$341.25	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$3,837.98	0
		MDP Total			$4,179.23	0
	200212 Total				$4,179.23	0
1420 Total					$32,245.08	0
1430	200201	MDP	549000	Other Power - Oper Misc Exp	$413.82	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$10,747.13	0
			554000	Other Pwr - Mtc Misc Exp	$8,528.00	0
		MDP Total			$19,688.95	0
	200201 Total				$19,688.95	0
	200202	MDP	549000	Other Power - Oper Misc Exp	$195.30	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$9,253.89	0
			554000	Other Pwr - Mtc Misc Exp	$192.00	0
		MDP Total			$9,641.19	0
	200202 Total				$9,641.19	0
	200203	MDP	549000	Other Power - Oper Misc Exp	$850.84	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$4,539.67	0
		MDP Total			$5,390.51	0
		PW1	549000	Other Power - Oper Misc Exp	$1,824.98	0
		PW1 Total			$1,824.98	0
	200203 Total				$7,215.49	0
	200204	MDP	549000	Other Power - Oper Misc Exp	$792.73	0
			552000	Other Power - Mtc Structures	$1,167.18	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$2,071.49	0
		MDP Total			$4,031.40	0
	200204 Total				$4,031.40	0
	200205	MDP	549000	Other Power - Oper Misc Exp	$67.04	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$5,467.58	0
			554000	Other Pwr - Mtc Misc Exp	$3,760.00	0

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					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1430	200205	MDP Total			$9,294.62	0
	200205 Total				$9,294.62	0
	200206	MDP	549000	Other Power - Oper Misc Exp	$1,733.94	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$920.44	0
			554000	Other Pwr - Mtc Misc Exp	$383.40	0
		MDP Total			$3,037.78	0
	200206 Total				$3,037.78	0
	200207	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	$30.00	0
		MDC Total			$30.00	0
		MDP	549000	Other Power - Oper Misc Exp	$952.41	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$4,752.65	0
			554000	Other Pwr - Mtc Misc Exp	$432.00	0
		MDP Total			$6,137.06	0
	200207 Total				$6,167.06	0
	200208	MCP	553000	Oth Pwr - Mtc Gen Elec Equip	$805.00	0
		MCP Total			$805.00	0
		MDP	549000	Other Power - Oper Misc Exp	$1,326.68	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$7,439.98	0
			554000	Other Pwr - Mtc Misc Exp	$4,258.80	0
		MDP Total			$13,025.46	0
	200208 Total				$13,830.46	0
	200209	MDP	549000	Other Power - Oper Misc Exp	$1,137.26	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$6,120.57	0
			554000	Other Pwr - Mtc Misc Exp	$569.40	0
		MDP Total			$7,827.23	0
	200209 Total				$7,827.23	0
	200210	MDP	549000	Other Power - Oper Misc Exp	$1,909.61	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$7,734.04	0
			554000	Other Pwr - Mtc Misc Exp	$2,789.50	0
		MDP Total			$12,433.15	0
	200210 Total				$12,433.15	0
	200211	MDP	549000	Other Power - Oper Misc Exp	$3,938.67	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$4,385.59	0
			554000	Other Pwr - Mtc Misc Exp	$7,365.10	0
		MDP Total			$15,689.36	0
	200211 Total				$15,689.36	0
	200212	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	-$.48	0
		MDC Total			-$.48	0
		MDP	549000	Other Power - Oper Misc Exp	$1,482.54	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$41,882.42	0
			554000	Other Pwr - Mtc Misc Exp	$441.00	0
		MDP Total			$43,805.96	0
	200212 Total				$43,805.48	0
1430 Total					$152,662.17	0
1440	200205	PV8	549200	MISC OTH PWR GE - SALARY & WAG	$935.00	0
		PV8 Total			$935.00	0
	200205 Total				$935.00	0
	200209	PV8	549200	MISC OTH PWR GE - SALARY & WAG	$31.88	0
		PV8 Total			$31.88	0
	200209 Total				$31.88	0
1440 Total					$966.88	0
1460	200201	MDP	549000	Other Power - Oper Misc Exp	$382.28	0
		MDP Total			$382.28	0
	200201 Total				$382.28	0
	200202	MDP	549000	Other Power - Oper Misc Exp	$91.15	0
		MDP Total			$91.15	0
	200202 Total				$91.15	0
	200203	MDP	549000	Other Power - Oper Misc Exp	$271.26	0
		MDP Total			$271.26	0
	200203 Total				$271.26	0
	200204	MDP	549000	Other Power - Oper Misc Exp	$425.69	0
		MDP Total			$425.69	0
	200204 Total				$425.69	0

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					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1460	200205	MDP	549000	Other Power - Oper Misc Exp	$309.63	0
		MDP Total			$309.63	0
	200205 Total				$309.63	0
	200206	TE7	546000	Other Power - Oper Sup & Eng	$4.73	0
		TE7 Total			$4.73	0
	200206 Total				$4.73	0
	200207	MDP	549000	Other Power - Oper Misc Exp	$97.48	0
		MDP Total			$97.48	0
		PW1	549000	Other Power - Oper Misc Exp	$59.79	0
		PW1 Total			$59.79	0
		TE7	546000	Other Power - Oper Sup & Eng	$21.72	0
		TE7 Total			$21.72	0
	200207 Total				$178.99	0
	200208	ARQ	549000	Other Power - Oper Misc Exp	$101.11	0
		ARQ Total			$101.11	0
		MDP	549000	Other Power - Oper Misc Exp	$100.54	0
		MDP Total			$100.54	0
	200208 Total				$201.65	0
	200209	MDP	549000	Other Power - Oper Misc Exp	$378.77	0
		MDP Total			$378.77	0
	200209 Total				$378.77	0
	200211	MDP	549000	Other Power - Oper Misc Exp	$23.52	0
		MDP Total			$23.52	0
		TE7	546000	Other Power - Oper Sup & Eng	$4.65	0
		TE7 Total			$4.65	0
	200211 Total				$28.17	0
	200212	MDP	549000	Other Power - Oper Misc Exp	$256.82	0
		MDP Total			$256.82	0
		TE7	546000	Other Power - Oper Sup & Eng	$18.20	0
		TE7 Total			$18.20	0
	200212 Total				$275.02	0
1460 Total					$2,547.34	0
1470	200201	107	549000	Other Power - Oper Misc Exp	$44.17	0
		107 Total			$44.17	0
		MDP	546000	Other Power - Oper Sup & Eng	$615.00	0
			549000	Other Power - Oper Misc Exp	$1,183.15	0
		MDP Total			$1,798.15	0
	200201 Total				$1,842.32	0
	200202	107	549000	Other Power - Oper Misc Exp	$85.05	0
		107 Total			$85.05	0
		MDC	553000	Oth Pwr - Mtc Gen Elec Equip	$101.81	0
		MDC Total			$101.81	0
		MDP	549000	Other Power - Oper Misc Exp	$471.00	0
		MDP Total			$471.00	0
		PW1	549000	Other Power - Oper Misc Exp	$275.44	0
		PW1 Total			$275.44	0
		TE7	546000	Other Power - Oper Sup & Eng	$263.38	0
			549000	Other Power - Oper Misc Exp	$328.39	0
		TE7 Total			$591.77	0
	200202 Total				$1,525.07	0
	200203	MDP	549000	Other Power - Oper Misc Exp	$410.67	0
		MDP Total			$410.67	0
	200203 Total				$410.67	0
	200204	MDP	553000	Oth Pwr - Mtc Gen Elec Equip	$288.50	0
		MDP Total			$288.50	0
	200204 Total				$288.50	0
	200205	MDP	549000	Other Power - Oper Misc Exp	$39.35	0
		MDP Total			$39.35	0
	200205 Total				$39.35	0
	200206	PW1	549000	Other Power - Oper Misc Exp	$10.07	0
		PW1 Total			$10.07	0
		TE7	546000	Other Power - Oper Sup & Eng	$71.60	0
		TE7 Total			$71.60	0

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					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1470	200206 Total				$81.67	0
	200207	ARQ	549000	Other Power - Oper Misc Exp	$48.18	0
		ARQ Total			$48.18	0
		PW1	549000	Other Power - Oper Misc Exp	$463.42	0
		PW1 Total			$463.42	0
		TE7	546000	Other Power - Oper Sup & Eng	$777.47	0
		TE7 Total			$777.47	0
	200207 Total				$1,289.07	0
	200208	107	549000	Other Power - Oper Misc Exp	$80.29	0
		107 Total			$80.29	0
		ARQ	549000	Other Power - Oper Misc Exp	$161.42	0
		ARQ Total			$161.42	0
		CBE	553000	Oth Pwr - Mtc Gen Elec Equip	$146.23	0
		CBE Total			$146.23	0
		MDP	549000	Other Power - Oper Misc Exp	$406.29	0
		MDP Total			$406.29	0
		PW1	549000	Other Power - Oper Misc Exp	$96.73	0
		PW1 Total			$96.73	0
		TE7	546000	Other Power - Oper Sup & Eng	$60.96	0
		TE7 Total			$60.96	0
	200208 Total				$951.92	0
	200209	CBE	553000	Oth Pwr - Mtc Gen Elec Equip	$117.60	0
		CBE Total			$117.60	0
		TE7	546000	Other Power - Oper Sup & Eng	$44.24	0
		TE7 Total			$44.24	0
	200209 Total				$161.84	0
	200211	TE7	546000	Other Power - Oper Sup & Eng	$17.63	0
		TE7 Total			$17.63	0
	200211 Total				$17.63	0
	200212	107	549000	Other Power - Oper Misc Exp	$85.41	0
		107 Total			$85.41	0
		MDP	549000	Other Power - Oper Misc Exp	$137.91	0
		MDP Total			$137.91	0
		PW1	549000	Other Power - Oper Misc Exp	$78.84	0
		PW1 Total			$78.84	0
		TE7	546000	Other Power - Oper Sup & Eng	$39.76	0
		TE7 Total			$39.76	0
	200212 Total				$341.92	0
1470 Total					$6,949.96	0
1480	200201	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$14.00	0
		25W Total			$14.00	0
		MDP	549000	Other Power - Oper Misc Exp	$88,734.15	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$78.24	0
		MDP Total			$88,812.39	0
		PWO	401661	SAL & BENEFITS - A & G - OTHER	$500.40	0
		PWO Total			$500.40	0
	200201 Total				$89,326.79	0
	200202	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$257.16	0
		25W Total			$257.16	0
		MDP	408110	Real Estate Taxes	$216,205.00	0
			548000	Other Power - Oper Gen Exp	$55.68	0
			549000	Other Power - Oper Misc Exp	$37,200.67	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$23.37	0
			554000	Other Pwr - Mtc Misc Exp	$785.54	0
		MDP Total			$254,270.26	0
		PV8	549200	MISC OTH PWR GE - SALARY & WAG	$841.20	0
		PV8 Total			$841.20	0
	200202 Total				$255,368.62	0
	200203	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$171.20	0
		25W Total			$171.20	0
		MDP	548000	Other Power - Oper Gen Exp	$66.18	0
			549000	Other Power - Oper Misc Exp	$54,014.51	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$247.54	0

Attachment OUCC/PSI 6-182-G

					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1480	200203	MDP	554000	Other Pwr - Mtc Misc Exp	$257.04	0
		MDP Total			$54,585.27	0
	200203 Total				$54,756.47	0
	200204	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$279.82	0
		25W Total			$279.82	0
		MDP	548000	Other Power - Oper Gen Exp	$59.18	0
			549000	Other Power - Oper Misc Exp	$40,219.08	0
			554000	Other Pwr - Mtc Misc Exp	$276.95	0
		MDP Total			$40,555.21	0
		PV8	549200	MISC OTH PWR GE - SALARY & WAG	$230.70	0
		PV8 Total			$230.70	0
	200204 Total				$41,065.73	0
	200205	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$292.98	0
		25W Total			$292.98	0
		MDP	548000	Other Power - Oper Gen Exp	$72.30	0
			549000	Other Power - Oper Misc Exp	$34,394.92	0
		MDP Total			$34,467.22	0
		PV8	549200	MISC OTH PWR GE - SALARY & WAG	$461.40	0
		PV8 Total			$461.40	0
	200205 Total				$35,221.60	0
	200206	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$163.81	0
		25W Total			$163.81	0
		MDP	408110	Real Estate Taxes	$421,666.50	0
			549000	Other Power - Oper Misc Exp	$39,539.61	0
			553000	Oth Pwr - Mtc Gen Elec Equip	-$.01	0
			554000	Other Pwr - Mtc Misc Exp	$2,454.05	0
		MDP Total			$463,660.15	0
		PV8	549200	MISC OTH PWR GE - SALARY & WAG	$230.70	0
		PV8 Total			$230.70	0
	200206 Total				$464,054.66	0
	200207	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$163.34	0
		25W Total			$163.34	0
		MDP	548000	Other Power - Oper Gen Exp	$131.98	0
			549000	Other Power - Oper Misc Exp	$39,189.65	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$170.98	0
			554000	Other Pwr - Mtc Misc Exp	$65.10	0
		MDP Total			$39,557.71	0
		PV8	549200	MISC OTH PWR GE - SALARY & WAG	$230.70	0
		PV8 Total			$230.70	0
	200207 Total				$39,951.75	0
	200208	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$99.11	0
		25W Total			$99.11	0
		MDP	548000	Other Power - Oper Gen Exp	$58.10	0
			549000	Other Power - Oper Misc Exp	$44,151.73	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$36.43	0
			554000	Other Pwr - Mtc Misc Exp	$4,079.35	0
		MDP Total			$48,325.61	0
	200208 Total				$48,424.72	0
	200209	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$51.25	0
		25W Total			$51.25	0
		MDP	548000	Other Power - Oper Gen Exp	$57.40	0
			549000	Other Power - Oper Misc Exp	$38,865.08	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$1,590.40	0
			554000	Other Pwr - Mtc Misc Exp	$84.32	0
		MDP Total			$40,597.20	0
	200209 Total				$40,648.45	0
	200210	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$71.11	0
		25W Total			$71.11	0
		MDP	548000	Other Power - Oper Gen Exp	$66.18	0
			549000	Other Power - Oper Misc Exp	$38,334.87	0
			553000	Oth Pwr - Mtc Gen Elec Equip	$50.00	0
			554000	Other Pwr - Mtc Misc Exp	$89.59	0
		MDP Total			$38,540.64	0

Attachment OUCC/PSI 6-182-G

					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1480	200210 Total				$38,611.75	0
	200211	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$211.20	0
		25W Total			$211.20	0
		MDP	549000	Other Power - Oper Misc Exp	$37,029.56	0
			554000	Other Pwr - Mtc Misc Exp	$86.70	0
		MDP Total			$37,116.26	0
	200211 Total				$37,327.46	0
	200212	25W	553000	Oth Pwr - Mtc Gen Elec Equip	$77.85	0
		25W Total			$77.85	0
		MDP	548000	Other Power - Oper Gen Exp	$206.36	0
			549000	Other Power - Oper Misc Exp	$74,970.02	0
			554000	Other Pwr - Mtc Misc Exp	$51.00	0
		MDP Total			$75,227.38	0
		PV8	549200	MISC OTH PWR GE - SALARY & WAG	-$41.51	0
		PV8 Total			-$41.51	0
	200212 Total				$75,263.72	0
1480 Total					$1,220,021.72	0
1500	200201	MDP	401684	Insurance Expense	$45,116.66	0
			548625	Intercompany Water Exp-CGE	$6,250.00	0
			549000	Other Power - Oper Misc Exp	$3,056.30	0
			553000	Oth Pwr - Mtc Gen Elec Equip	-$8,301.65	0
		MDP Total			$46,121.31	0
	200201 Total				$46,121.31	0
	200202	MDC	553000	Oth Pwr - Mtc Gen Elec Equip	-$186,496.97	0
		MDC Total			-$186,496.97	0
		MDP	401684	Insurance Expense	-$45,116.66	0
			408110	Real Estate Taxes	-$216,205.00	0
			548625	Intercompany Water Exp-CGE	$6,250.00	0
			549000	Other Power - Oper Misc Exp	$761.48	0
		MDP Total			-$254,310.18	0
	200202 Total				-$440,807.15	0
	200203	ECE	401631	A&G SALARIES & BENEFITS - ELEC	-$1,351.06	0
			401696	Alloc fr CinServ - A&G Labor	$75.87	0
		ECE Total			-$1,275.19	0
		MDC	553000	Oth Pwr - Mtc Gen Elec Equip	-$33,283.03	0
		MDC Total			-$33,283.03	0
		MDP	548625	Intercompany Water Exp-CGE	$6,250.00	0
			549000	Other Power - Oper Misc Exp	$484.83	0
		MDP Total			$6,734.83	0
		PWO	401631	A&G SALARIES & BENEFITS - ELEC	-$500.40	0
			549000	Other Power - Oper Misc Exp	$500.40	0
		PWO Total			$.00	0
	200203 Total				-$27,823.39	0
	200204	MDP	548625	Intercompany Water Exp-CGE	$6,250.00	0
			549000	Other Power - Oper Misc Exp	$235.99	0
		MDP Total			$6,485.99	0
	200204 Total				$6,485.99	0
	200205	MDP	401431	SALARIES & BENEFITS - ELECTRIC	$999.32	0
			548625	Intercompany Water Exp-CGE	$6,250.00	0
			549000	Other Power - Oper Misc Exp	$489.98	0
			553000	Oth Pwr - Mtc Gen Elec Equip	-$11,988.32	0
		MDP Total			-$4,249.02	0
	200205 Total				-$4,249.02	0
	200206	MDP	408110	Real Estate Taxes	-$421,666.50	0
			548625	Intercompany Water Exp-CGE	$6,695.14	0
			549000	Other Power - Oper Misc Exp	-$299.02	0
		MDP Total			-$415,270.38	0
	200206 Total				-$415,270.38	0
	200207	MDP	548625	Intercompany Water Exp-CGE	$6,250.00	0
			549000	Other Power - Oper Misc Exp	$2,274.02	0
		MDP Total			$8,524.02	0
	200207 Total				$8,524.02	0
	200208	MDP	548625	Intercompany Water Exp-CGE	$6,250.00	0

Attachment OUCC/PSI 6-182-G

					$ and Units	
Resource	Accounting_Period	Center	Account	Account_Description	Amount	Quantity
1500	200208	MDP	549000	Other Power - Oper Misc Exp	-$141.83	0
		MDP Total			$6,108.17	0
	200208 Total				$6,108.17	0
	200209	MDP	548625	Intercompany Water Exp-CGE	$6,250.00	0
			549000	Other Power - Oper Misc Exp	$713.16	0
		MDP Total			$6,963.16	0
	200209 Total				$6,963.16	0
	200210	MDP	548625	Intercompany Water Exp-CGE	$6,250.00	0
			549000	Other Power - Oper Misc Exp	$408.48	0
		MDP Total			$6,658.48	0
	200210 Total				$6,658.48	0
	200211	380	553000	MAINTENANCE OF GENERATING AND	$2,108.22	0
		380 Total			$2,108.22	0
		MDP	548625	Intercompany Water Exp-CGE	$6,250.00	0
			549000	Other Power - Oper Misc Exp	$272.85	0
		MDP Total			$6,522.85	0
	200211 Total				$8,631.07	0
	200212	MDP	548625	Intercompany Water Exp-CGE	$6,250.00	0
			549000	Other Power - Oper Misc Exp	$13.26	0
		MDP Total			$6,263.26	0
	200212 Total				$6,263.26	0
1500 Total					-$792,394.48	0
Grand Total					$1,049,642.05	12,818

Labor Resource 1000 &1080	$640,937.55
Non-Labor	$408,704.50

$1,102,179 in 2001
per 6-182-F
∴ 02' looks representative
NFWR

Attachment OUCC/PSI 6-182-H

FRT - v 3.00.0054
5/12/03 1:42 pm

Work_Type_Descri	(All)
Report_to_Center	(All)
Process_Id_Descri	(All)
Corporation_Descri	(All)
Corporation	(All)
Center_type	(All)
Center_Description	(All)
BusinessSegment_	(All)
BusinessSegment	(All)
Account_type	(All)
ProcessID	(All)

Henry County - 2001

Actuals

				$ and Units	
Accounting_Period	Center	Account	Account_Description	Amount	Quantity
200101	104	506200	MISC STEAM POWER EXP - LABOR	$757.81	18
	104 Total			$757.81	18
	111	401651	A&G MISC EXPENSES - ELECTRIC	-$192.06	0
	111 Total			-$192.06	0
	2RP	401631	A&G SALARIES & BENEFITS - ELEC	$3,106.51	72
	2RP Total			$3,106.51	72
	CDP	401451	DIRECT COST MISC EXPENSES	$33.80	0
		401651	A&G MISC EXPENSES - ELECTRIC	$192.06	0
	CDP Total			$225.86	0
	ECE	401484	EC NONREG CHARGES - LABOR	$287.36	9
	ECE Total			$287.36	9
	PW1	401651	A&G MISC EXPENSES - ELECTRIC	$278.08	0
	PW1 Total			$278.08	0
200101 Total				$4,463.56	98
200102	104	506200	MISC STEAM POWER EXP - LABOR	$930.75	23
	104 Total			$930.75	23
	111	401651	A&G MISC EXPENSES - ELECTRIC	-$612.52	0
	111 Total			-$612.52	0
	265	549000	MISCELLANEOUS OTHER POWER GENE	$136.25	0
	265 Total			$136.25	0
	2RP	401631	A&G SALARIES & BENEFITS - ELEC	$3,352.34	65
	2RP Total			$3,352.34	65
	CDP	401451	DIRECT COST MISC EXPENSES	$33.80	0
		401651	A&G MISC EXPENSES - ELECTRIC	$612.52	0
	CDP Total			$646.32	0
	ECE	401484	EC NONREG CHARGES - LABOR	$392.58	12
	ECE Total			$392.58	12
	PW1	401651	A&G MISC EXPENSES - ELECTRIC	$316.38	0
	PW1 Total			$316.38	0
200102 Total				$5,162.10	100
200103	104	506200	MISC STEAM POWER EXP - LABOR	$512.77	10
	104 Total			$512.77	10
	111	401651	A&G MISC EXPENSES - ELECTRIC	-$192.06	0
	111 Total			-$192.06	0
	265	549000	MISCELLANEOUS OTHER POWER GENE	$5,361.33	0
	265 Total			$5,361.33	0
	2RP	401631	A&G SALARIES & BENEFITS - ELEC	$2,700.36	55
	2RP Total			$2,700.36	55

Attachment OUCC/PSI 6-182-H

				$ and Units	
Accounting_Period	Center	Account	Account_Description	Amount	Quantity
200103	ARQ	401651	A&G MISC EXPENSES - ELECTRIC	$46.00	0
	ARQ Total			$46.00	0
	CDP	401431	SALARIES & BENEFITS - ELECTRIC	$79.38	0
		401451	DIRECT COST MISC EXPENSES	$33.80	0
		401651	A&G MISC EXPENSES - ELECTRIC	$192.06	0
	CDP Total			$305.24	0
	ECE	401484	EC NONREG CHARGES - LABOR	$349.19	11
	ECE Total			$349.19	11
	PW1	401651	A&G MISC EXPENSES - ELECTRIC	$489.44	0
	PW1 Total			$489.44	0
200103 Total				$9,572.27	76
200104	111	401651	A&G MISC EXPENSES - ELECTRIC	-$192.06	0
	111 Total			-$192.06	0
	2RP	401631	A&G SALARIES & BENEFITS - ELEC	$3,494.54	68
	2RP Total			$3,494.54	68
	ARQ	401651	A&G MISC EXPENSES - ELECTRIC	$207.00	0
	ARQ Total			$207.00	0
	CDP	401651	A&G MISC EXPENSES - ELECTRIC	$651.75	0
	CDP Total			$651.75	0
	ECE	401484	EC NONREG CHARGES - LABOR	$324.76	10
	ECE Total			$324.76	10
	PW1	401651	A&G MISC EXPENSES - ELECTRIC	$268.22	0
	PW1 Total			$268.22	0
200104 Total				$4,754.21	78
200105	104	506200	MISC STEAM POWER EXP - LABOR	$1,381.22	28
	104 Total			$1,381.22	28
	107	401451	DIRECT COST MISC EXPENSES	$10.50	0
	107 Total			$10.50	0
	111	401651	A&G MISC EXPENSES - ELECTRIC	-$192.06	0
	111 Total			-$192.06	0
	265	401431	SALARIES & BENEFITS - ELECTRIC	$15,378.09	323
	265 Total			$15,378.09	323
	267	401431	SALARIES & BENEFITS - ELECTRIC	$4,253.31	84
	267 Total			$4,253.31	84
	2RP	401431	SALARIES & BENEFITS - ELECTRIC	$2,277.60	0
		401631	A&G SALARIES & BENEFITS - ELEC	$9,292.06	197
		401651	A&G MISC EXPENSES - ELECTRIC	$750.87	0
	2RP Total			$12,320.53	197
	2RS	401431	SALARIES & BENEFITS - ELECTRIC	$150.42	0
	2RS Total			$150.42	0
	ARQ	401651	A&G MISC EXPENSES - ELECTRIC	$95.70	0
	ARQ Total			$95.70	0
	CBW	920010	A&G Salaries & Wages	$33.50	0
		921010	OFFICE SUPPLIES AND EXPENSES	$8.27	0
	CBW Total			$41.77	0
	CDP	401431	SALARIES & BENEFITS - ELECTRIC	$990.00	0
		401451	DIRECT COST MISC EXPENSES	$178.19	0
		401651	A&G MISC EXPENSES - ELECTRIC	$644.54	0
		401652	Operator Fee Expense	$15,225.00	0
	CDP Total			$17,037.73	0
	ECE	401484	EC NONREG CHARGES - LABOR	$353.18	11
	ECE Total			$353.18	11
	PW1	401431	OPERATIONS	$84.42	0
		401631	A & G	$1,204.52	16
	PW1 Total			$1,288.94	16

Attachment OUCC/PSI 6-182-H

				$ and Units	
Accounting_Period	Center	Account	Account_Description	Amount	Quantity
200105	TMS	570210	MTCE STA EQUIP - OFFICE SUPPLI	$345.30	0
	TMS Total			$345.30	0
200105 Total				$52,464.63	658
200106	104	401651	A&G MISC EXPENSES - ELECTRIC	$60.03	0
		506200	MISC STEAM POWER EXP - LABOR	$1,676.64	32
	104 Total			$1,736.67	32
	111	401651	A&G MISC EXPENSES - ELECTRIC	-$159.75	0
	111 Total			-$159.75	0
	265	401431	SALARIES & BENEFITS - ELECTRIC	$10,671.44	196
	265 Total			$10,671.44	196
	267	401431	SALARIES & BENEFITS - ELECTRIC	$31,096.22	587
		401651	A&G MISC EXPENSES - ELECTRIC	$264.87	5
	267 Total			$31,361.09	592
	2RP	401431	SALARIES & BENEFITS - ELECTRIC	$3,987.91	0
		401631	A&G SALARIES & BENEFITS - ELEC	$15,698.03	291
		401651	A&G MISC EXPENSES - ELECTRIC	$676.71	0
	2RP Total			$20,362.65	291
	30E	401431	SALARIES & BENEFITS - ELECTRIC	$936.30	19
	30E Total			$936.30	19
	ARQ	401651	A&G MISC EXPENSES - ELECTRIC	$267.27	0
	ARQ Total			$267.27	0
	CBW	920010	A&G Salaries & Wages	$20.94	0
		921010	OFFICE SUPPLIES AND EXPENSES	$.80	0
	CBW Total			$21.74	0
	CDP	401431	SALARIES & BENEFITS - ELECTRIC	$307.56	0
		401451	DIRECT COST MISC EXPENSES	$591.26	0
		401651	A&G MISC EXPENSES - ELECTRIC	$12,543.14	0
		401652	Operator Fee Expense	-$15,225.00	0
	CDP Total			-$1,783.04	0
	ECE	401484	EC NONREG CHARGES - LABOR	$176.14	6
	ECE Total			$176.14	6
	PW1	401431	OPERATIONS	$245.37	0
			SALARIES & BENEFITS - ELECTRIC	$1,317.98	0
		401631	A & G	$1,756.70	21
			A&G SALARIES & BENEFITS - ELEC	$1,842.00	32
		401651	A&G MISC EXPENSES - ELECTRIC	$156.64	0
	PW1 Total			$5,318.69	53
200106 Total				$68,909.20	1,188
200107	104	506200	MISC STEAM POWER EXP - LABOR	-$31.89	2
	104 Total			-$31.89	2
	111	401651	A&G MISC EXPENSES - ELECTRIC	-$159.75	0
	111 Total			-$159.75	0
	265	401431	SALARIES & BENEFITS - ELECTRIC	$20,436.84	360
	265 Total			$20,436.84	360
	267	401431	SALARIES & BENEFITS - ELECTRIC	$25,867.49	459
	267 Total			$25,867.49	459
	2RP	401431	SALARIES & BENEFITS - ELECTRIC	$4,442.57	0
		401631	A&G SALARIES & BENEFITS - ELEC	$11,615.64	237
	2RP Total			$16,058.21	237
	ARQ	401651	A&G MISC EXPENSES - ELECTRIC	$119.62	0
	ARQ Total			$119.62	0
	CBW	510200	MTCE SUPV & ENGR - SALARY & WA	$32.70	0
	CBW Total			$32.70	0
	CDP	401431	SALARIES & BENEFITS - ELECTRIC	$4,391.75	0
		401451	DIRECT COST MISC EXPENSES	$813.63	0

Attachment OUCC/PSI 6-182-H

				$ and Units	
Accounting_Period	Center	Account	Account_Description	Amount	Quantity
200107	CDP	401651	A&G MISC EXPENSES - ELECTRIC	$659.02	0
	CDP Total			$5,864.40	0
	CDZ	510000	PRODUCTION EXPENSE-MAINTENANCE	$12.90	0
	CDZ Total			$12.90	0
	DNT	920000	ADMIN & GENERAL LABOR - ELECTR	$75.66	0
		920010	A&G Salaries & Wages	$178.30	6
		920090	ADMIN & GENERAL LABOR - GAS	$19.20	0
		920990	ADMIN & GENERAL LABOR - JOINT	-$94.86	0
	DNT Total			$178.30	6
	ECE	401484	EC NONREG CHARGES - LABOR	$398.65	11
	ECE Total			$398.65	11
	PW1	401431	OPERATIONS	$22.00	0
			SALARIES & BENEFITS - ELECTRIC	$1,957.23	0
		401631	A & G	$1,668.94	21
			A&G SALARIES & BENEFITS - ELEC	$17,820.83	349
		401651	A&G MISC EXPENSES - ELECTRIC	$550.49	0
	PW1 Total			$22,019.49	370
200107 Total				$90,796.96	1,444
200108	104	506200	MISC STEAM POWER EXP - LABOR	$502.22	11
	104 Total			$502.22	11
	111	401651	A&G MISC EXPENSES - ELECTRIC	-$188.68	0
	111 Total			-$188.68	0
	265	401431	SALARIES & BENEFITS - ELECTRIC	$43,416.03	781
	265 Total			$43,416.03	781
	267	401431	SALARIES & BENEFITS - ELECTRIC	$31,510.90	551
	267 Total			$31,510.90	551
	2RP	401431	SALARIES & BENEFITS - ELECTRIC	$3,591.55	11
		401631	A&G SALARIES & BENEFITS - ELEC	$11,762.05	237
		401651	A&G MISC EXPENSES - ELECTRIC	$1,367.16	0
	2RP Total			$16,720.76	248
	2RS	401631	A&G SALARIES & BENEFITS - ELEC	$111.07	4
	2RS Total			$111.07	4
	30E	401431	SALARIES & BENEFITS - ELECTRIC	$733.51	16
	30E Total			$733.51	16
	CBW	510200	MTCE SUPV & ENGR - SALARY & WA	$147.38	0
	CBW Total			$147.38	0
	CDP	401431	SALARIES & BENEFITS - ELECTRIC	$6,810.69	0
		401451	DIRECT COST MISC EXPENSES	$507.00	0
		401651	A&G MISC EXPENSES - ELECTRIC	$8,150.92	0
	CDP Total			$15,468.61	0
	CDZ	510000	PRODUCTION EXPENSE-MAINTENANCE	-$12.90	0
	CDZ Total			-$12.90	0
	DNT	920000	ADMIN & GENERAL LABOR - ELECTR	-$10.47	0
		920010	A&G Salaries & Wages	-$24.63	0
		920090	ADMIN & GENERAL LABOR - GAS	-$2.58	0
		920990	ADMIN & GENERAL LABOR - JOINT	$13.05	0
	DNT Total			-$24.63	0
	ECE	401484	EC NONREG CHARGES - LABOR	$419.51	12
	ECE Total			$419.51	12
	PW1	401431	OPERATIONS	$178.40	0
			SALARIES & BENEFITS - ELECTRIC	$5,359.52	12
		401631	A & G	-$864.55	-8
			A&G SALARIES & BENEFITS - ELEC	$26,418.24	514
		401651	A&G MISC EXPENSES - ELECTRIC	$28.01	0
		551000	OTHER PWR - MAINT SUPV & ENG	$116.22	2

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				$ and Units	
Accounting_Period	Center	Account	Account_Description	Amount	Quantity
200108	PW1	551200	MTCE SUPV & ENGR - SALARY & WA	$1,283.11	14
	PW1 Total			$32,518.95	533
	PWO	922010	ADMINISTRATIVE EXPENSES TRANSF	-$1,405.00	0
	PWO Total			-$1,405.00	0
200108 Total				$139,917.73	2,155
200109	104	506200	MISC STEAM POWER EXP - LABOR	$99.89	2
	104 Total			$99.89	2
	107	401461	SAL & BEN -COST OF SALES- OTHE	$364.03	8
	107 Total			$364.03	8
	265	401431	SALARIES & BENEFITS - ELECTRIC	$4,829.70	86
	265 Total			$4,829.70	86
	267	401431	SALARIES & BENEFITS - ELECTRIC	$5,983.10	118
	267 Total			$5,983.10	118
	2RP	401431	SALARIES & BENEFITS - ELECTRIC	$2,503.39	0
		401631	A&G SALARIES & BENEFITS - ELEC	$6,560.71	122
	2RP Total			$9,064.10	122
	2RS	401631	A&G SALARIES & BENEFITS - ELEC	$648.70	11
	2RS Total			$648.70	11
	30E	401431	SALARIES & BENEFITS - ELECTRIC	$87.63	0
	30E Total			$87.63	0
	ARQ	401651	A&G MISC EXPENSES - ELECTRIC	$23.93	0
		506200	MISC STEAM POWER EXP - LABOR	$257.73	4
	ARQ Total			$281.66	4
	CBW	510200	MTCE SUPV & ENGR - SALARY & WA	$1,422.47	35
	CBW Total			$1,422.47	35
	CDP	401431	SALARIES & BENEFITS - ELECTRIC	$37,227.99	0
		401451	DIRECT COST MISC EXPENSES	$19,683.79	0
		401651	A&G MISC EXPENSES - ELECTRIC	$475.20	0
		401697	Alloc fr CinServ - A&G Non Lbr	$188.68	0
		548500	Other Power - Oper Mgmt Fee	$15,225.00	0
	CDP Total			$72,800.66	0
	ECE	401484	EC NONREG CHARGES - LABOR	$398.69	10
	ECE Total			$398.69	10
	PW1	401431	OPERATIONS	$686.51	0
			SALARIES & BENEFITS - ELECTRIC	$1,020.75	10
		401631	A&G SALARIES & BENEFITS - ELEC	$10,419.25	182
		401651	A&G MISC EXPENSES - ELECTRIC	-$114.96	0
		551200	MTCE SUPV & ENGR - SALARY & WA	$1,668.83	19
	PW1 Total			$13,680.38	211
	PWO	401697	Alloc fr CinServ - A&G Non Lbr	$708.63	0
	PWO Total			$708.63	0
200109 Total				$110,369.64	606
200110	104	506200	MISC STEAM POWER EXP - LABOR	$568.57	13
	104 Total			$568.57	13
	265	401431	SALARIES & BENEFITS - ELECTRIC	$1,322.60	19
		549000	Other Power - Oper Misc Exp	$22.77	0
		553000	Oth Pwr - Mtc Gen Elec Equip	$1,753.11	36
	265 Total			$3,098.48	55
	267	401431	SALARIES & BENEFITS - ELECTRIC	$22.77	0
		549000	Other Power - Oper Misc Exp	$190.79	0
		553000	Oth Pwr - Mtc Gen Elec Equip	$676.24	13
	267 Total			$889.80	13
	2RP	401431	SALARIES & BENEFITS - ELECTRIC	$2,096.36	0
		401631	A&G SALARIES & BENEFITS - ELEC	$2,196.09	43
		546000	Other Power - Oper Sup & Eng	$1,627.26	33

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Accounting_Period	Center	Account	Account_Description	$ and Units Amount	Quantity
200110	2RP	549000	Other Power - Oper Misc Exp	$955.49	0
	2RP Total			$6,875.20	76
	2RS	401631	A&G SALARIES & BENEFITS - ELEC	$85.10	2
		546000	Other Power - Oper Sup & Eng	$468.06	10
	2RS Total			$553.16	11
	ARQ	401651	A&G MISC EXPENSES - ELECTRIC	$23.93	0
		506200	MISC STEAM POWER EXP - LABOR	$118.93	2
	ARQ Total			$142.86	2
	CBW	500300	OPER SUPV & ENGR - MISC GENL E	$72.90	0
		502300	STEAM EXPENSES - MISC GENL EXP	$12.90	0
		510200	MTCE SUPV & ENGR - SALARY & WA	$3,662.27	64
	CBW Total			$3,748.07	64
	CDP	401431	SALARIES & BENEFITS - ELECTRIC	$21,763.14	0
		401451	DIRECT COST MISC EXPENSES	$28,816.40	0
		401651	A&G MISC EXPENSES - ELECTRIC	$26,151.78	0
		548500	Other Power - Oper Mgmt Fee	$24,291.00	0
		548621	Operations Expense	$296,680.92	0
		549000	Other Power - Oper Misc Exp	$122.11	0
	CDP Total			$397,825.35	0
	CDZ	401451	DIRECT COST MISC EXPENSES	$10.00	0
	CDZ Total			$10.00	0
	ECE	401484	EC NONREG CHARGES - LABOR	$400.29	12
	ECE Total			$400.29	12
	PW1	401431	OPERATIONS	$19.61	0
			SALARIES & BENEFITS - ELECTRIC	$1,536.58	7
		401631	A & G	$180.27	4
			A&G SALARIES & BENEFITS - ELEC	$8,671.91	168
		551200	MTCE SUPV & ENGR - SALARY & WA	$2,815.62	35
	PW1 Total			$13,223.99	214
	PWO	401697	Alloc fr CinServ - A&G Non Lbr	$1,161.92	0
	PWO Total			$1,161.92	0
	RMW	566210	ELECTRIC - OFFICE SUPPLIES	$181.94	4
		588210	MISC DIST EXPS - OFFICE SUPPLI	$181.94	4
	RMW Total			$363.88	8
200110 Total				$428,861.57	468
200111	104	506200	MISC STEAM POWER EXP - LABOR	-$26.66	0
		549200	MISC OTH PWR GE - SALARY & WAG	$499.50	10
	104 Total			$472.84	10
	25W	401431	SALARIES & BENEFITS - ELECTRIC	$170.43	0
	25W Total			$170.43	0
	265	549000	Other Power - Oper Misc Exp	$498.24	8
		553000	Oth Pwr - Mtc Gen Elec Equip	$673.61	16
	265 Total			$1,171.85	24
	267	549000	Other Power - Oper Misc Exp	$113.86	0
		553000	Oth Pwr - Mtc Gen Elec Equip	$1,497.31	30
	267 Total			$1,611.17	30
	2RP	546000	Other Power - Oper Sup & Eng	$2,885.19	54
		549000	Other Power - Oper Misc Exp	$1,653.77	0
	2RP Total			$4,538.96	54
	2RS	546000	Other Power - Oper Sup & Eng	$553.15	10
	2RS Total			$553.15	10
	ARQ	401651	A&G MISC EXPENSES - ELECTRIC	$23.93	0
	ARQ Total			$23.93	0
	CBW	500300	OPER SUPV & ENGR - MISC GENL E	$32.08	0
		510200	MTCE SUPV & ENGR - SALARY & WA	$493.68	10

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				$ and Units	
Accounting_Period	Center	Account	Account_Description	Amount	Quantity
200111	CBW Total			$525.76	10
	CDP	401431	SALARIES & BENEFITS - ELECTRIC	$26.44	0
		401651	A&G MISC EXPENSES - ELECTRIC	$16,806.69	0
		548500	Other Power - Oper Mgmt Fee	$27,140.40	0
		548621	Operations Expense	$17,534.24	0
		549000	Other Power - Oper Misc Exp	$5,297.63	0
		553000	Oth Pwr - Mtc Gen Elec Equip	$987.47	0
	CDP Total			$67,792.87	0
	CDZ	401431	SALARIES & BENEFITS - ELECTRIC	$510.58	0
		553000	Oth Pwr - Mtc Gen Elec Equip	-$201.90	0
	CDZ Total			$308.68	0
	ECE	401484	EC NONREG CHARGES - LABOR	$379.45	13
	ECE Total			$379.45	13
	PW1	401431	SALARIES & BENEFITS - ELECTRIC	$241.30	11
		401631	A&G SALARIES & BENEFITS - ELEC	-$859.33	-32
		546200	OPER SUPV & ENGR - SALARY & WA	$383.08	9
		551200	MTCE SUPV & ENGR - SALARY & WA	$988.73	9
	PW1 Total			$753.78	-4
	PWO	401697	Alloc fr CinServ - A&G Non Lbr	$1,244.07	0
		549200	MISC OTH PWR GE - SALARY & WAG	$749.70	0
	PWO Total			$1,993.77	0
200111 Total				$80,296.64	147
200112	104	506200	MISC STEAM POWER EXP - LABOR	$518.74	11
		549200	MISC OTH PWR GE - SALARY & WAG	$1,535.93	31
	104 Total			$2,054.67	42
	265	548000	Other Power - Oper Gen Exp	$654.84	16
		549000	MISCELLANEOUS OTHER POWER GENE	$28.21	0
			Other Power - Oper Misc Exp	$1,291.37	26
		553000	Oth Pwr - Mtc Gen Elec Equip	$1,001.52	24
	265 Total			$2,975.94	66
	267	548000	Other Power - Oper Gen Exp	$715.01	16
		549000	Other Power - Oper Misc Exp	$45.54	0
		553000	Oth Pwr - Mtc Gen Elec Equip	$1,015.69	23
	267 Total			$1,776.24	39
	2RP	401631	A&G SALARIES & BENEFITS - ELEC	-$698.95	-13
		546000	Other Power - Oper Sup & Eng	$854.88	12
		549000	Other Power - Oper Misc Exp	$648.73	0
	2RP Total			$804.66	-1
	2RS	546000	Other Power - Oper Sup & Eng	$676.87	12
	2RS Total			$676.87	12
	CBW	500300	OPER SUPV & ENGR - MISC GENL E	$7.15	0
	CBW Total			$7.15	0
	CDP	401685	Miscellaneous Expense	-$132,347.50	0
		548500	Other Power - Oper Mgmt Fee	$26,668.50	0
		549000	Other Power - Oper Misc Exp	$8,010.76	0
		553000	Oth Pwr - Mtc Gen Elec Equip	$710.32	0
	CDP Total			-$96,957.92	0
	CDZ	549000	Other Power - Oper Misc Exp	-$5,342.87	0
	CDZ Total			-$5,342.87	0
	ECE	401484	EC NONREG CHARGES - LABOR	$533.05	13
	ECE Total			$533.05	13
	PW1	401431	SALARIES & BENEFITS - ELECTRIC	-$333.10	-16
		401631	A&G SALARIES & BENEFITS - ELEC	-$6,408.12	-125
		546000	Other Power - Oper Sup & Eng	$2,779.59	53
		546200	OPER SUPV & ENGR - SALARY & WA	$289.84	6

Attachment OUCC/PSI 6-182-H

Accounting_Period	Center	Account	Account_Description	$ and Units Amount	Quantity
200112	PW1	549000	Other Power - Oper Misc Exp	$451.30	21
		551200	MTCE SUPV & ENGR - SALARY & WA	$630.43	5
	PW1 Total			-$2,590.06	-56
	PWO	401697	Alloc fr CinServ - A&G Non Lbr	$589.54	0
	PWO Total			$589.54	0
	TEF	509100	Production Expense - Operation	$1,659.34	40
	TEF Total			$1,659.34	40
200112 Total				-$93,813.39	156
Grand Total				$901,755.12	7,174

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Work_Typ	(All)
Report_to	(All)
Process_I	(All)
Corporatio	(All)
Corporatio	(All)
Center_typ	(All)
Center_De	(All)
BusinessS	(All)
BusinessS	(All)
Account_ty	(All)
ProcessID	(All)
Account	(All)

Henry County - 2002

				$ and Units	
Resource	Accounting_Period	Center	Account_Description	Amount	Quantity
1000	200201	107	Other Power - Oper Misc Exp	$196.91	4
		191	Other Power - Oper Sup & Eng	$373.95	4
		25W		$208.20	4
		265	Oth Pwr - Mtc Gen Elec Equip	$4,195.74	96
			Other Power - Oper Gen Exp	$4,392.91	97
		267	Oth Pwr - Mtc Gen Elec Equip	$3,086.14	69
			Other Power - Oper Gen Exp	$3,585.89	85
		2RP	Other Power - Oper Misc Exp	$900.31	20
			Other Power - Oper Sup & Eng	$3,372.69	66
		2RS	Other Power - Oper Sup & Eng	$2,083.55	52
		ARQ	Other Power - Oper Misc Exp	$59.54	1
		CBW	MTCE SUPV & ENGR - SALARY & WA	$8.82	0
		ECE	EC NONREG CHARGES - LABOR	$567.87	15
		POF	Other Power - Oper Sup & Eng	$439.88	4
		PW1	Other Power - Oper Misc Exp	$239.48	11
			Other Power - Oper Sup & Eng	$3,768.73	62
	200201 Total			$27,480.61	591
	200202	191	Other Power - Oper Sup & Eng	$378.99	4
		265	Oth Pwr - Mtc Gen Elec Equip	$3,987.05	95
			Other Power - Oper Gen Exp	$1,612.22	38
			Other Power - Oper Misc Exp	$40.93	1
		267	Oth Pwr - Mtc Gen Elec Equip	$3,324.31	82
			Other Power - Mtc Structures	$81.86	2
			Other Power - Oper Gen Exp	$297.96	6
		2RP	Other Power - Oper Misc Exp	$201.11	4
			Other Power - Oper Sup & Eng	$3,275.68	55
		2RS	Other Power - Oper Sup & Eng	$2,184.39	47
		ARQ	Other Power - Oper Misc Exp	$994.04	17
		ECE	EC NONREG CHARGES - LABOR	$108.17	3
		POF	Other Power - Oper Sup & Eng	$484.97	3
		PW1	Other Power - Oper Misc Exp	$209.42	9
			Other Power - Oper Sup & Eng	$5,257.86	82
	200202 Total			$22,438.96	448
	200203	104	Other Power - Oper Misc Exp	$5,718.19	105
		191	Other Power - Oper Sup & Eng	$375.39	4
		25W		$538.09	10
		265	Oth Pwr - Mtc Gen Elec Equip	$780.40	18
			Other Power - Mtc Structures	$783.58	18

Attachment OUCC/PSI 6-182-I

				$ and Units	
Resource	Accounting_Period	Center	Account_Description	Amount	Quantity
1000	200203	265	Other Power - Oper Gen Exp	$1,243.81	28
			Other Power - Oper Misc Exp	$3,220.15	74
		267	Oth Pwr - Mtc Gen Elec Equip	$1,052.54	24
			Other Power - Mtc Structures	$1,841.61	42
			Other Power - Oper Gen Exp	$2,127.76	48
			Other Power - Oper Misc Exp	$763.82	18
		2RP	Other Power - Oper Sup & Eng	$2,903.16	50
		2RS	Other Power - Oper Sup & Eng	$2,064.94	46
		ECE	A&G Salaries & Wages	$135.21	4
			EC NONREG CHARGES - LABOR	-$676.02	-18
		POF	Other Power - Oper Sup & Eng	$489.10	4
		PW1	Other Power - Oper Misc Exp	$238.60	10
			Other Power - Oper Sup & Eng	$4,198.66	63
	200203 Total			$27,798.99	546
	200204	104	Other Power - Oper Misc Exp	$2,353.79	51
		191	Other Power - Oper Sup & Eng	$376.15	4
		25W		$293.18	6
		265	Oth Pwr - Mtc Gen Elec Equip	$9,293.29	214
			Other Power - Oper Gen Exp	$1,179.68	28
			Other Power - Oper Misc Exp	$961.58	22
		267	Oth Pwr - Mtc Gen Elec Equip	$9,736.08	209
			Other Power - Oper Gen Exp	$1,113.08	26
		2RP	Other Power - Oper Sup & Eng	$3,577.28	65
		2RS	Other Power - Oper Sup & Eng	$2,242.63	52
		34C	Oth Pwr - Mtc Gen Elec Equip	$3,389.77	80
		34D	Oth Pwr - Mtc Gen Elec Equip	$2,106.83	56
		ARQ	Other Power - Oper Misc Exp	$4,401.68	71
		ECE	A&G Salaries & Wages	$579.20	0
			Alloc fr CinServ - A&G Labor	-$579.20	0
		POF	Other Power - Oper Sup & Eng	$550.85	4
		PV7	MISC OTH PWR GE - SALARY & WAG	$79.71	2
		PW1	Oth Pwr - Mtc Gen Elec Equip	$1,089.90	20
			Other Power - Oper Misc Exp	$226.90	10
			Other Power - Oper Sup & Eng	$2,697.06	37
	200204 Total			$45,669.44	955
	200205	104	Other Power - Oper Misc Exp	-$2,353.79	-51
		191	Other Power - Oper Sup & Eng	$385.88	4
		25W		$253.57	5
		265	Oth Pwr - Mtc Gen Elec Equip	$6,630.26	162
			Other Power - Mtc Structures	$1,391.54	34
			Other Power - Oper Gen Exp	$1,637.10	40
			Other Power - Oper Misc Exp	$736.70	18
		267	Oth Pwr - Mtc Gen Elec Equip	$2,658.92	64
			Other Power - Oper Misc Exp	$330.63	8
		2RP	Other Power - Oper Sup & Eng	$3,997.70	75
		2RS	Other Power - Oper Misc Exp	$83.97	6
			Other Power - Oper Sup & Eng	$2,495.35	59
		ARQ	Other Power - Oper Misc Exp	$1,434.15	26
		POF	Other Power - Oper Sup & Eng	$482.22	4
		PW1	Oth Pwr - Mtc Gen Elec Equip	$2,070.81	38
			Other Power - Oper Misc Exp	$262.73	11
			Other Power - Oper Sup & Eng	$5,344.23	100
	200205 Total			$27,841.97	603
	200206	191	Other Power - Oper Sup & Eng	$389.52	4
		25W		$293.26	5

Attachment OUCC/PSI 6-182-I

				$ and Units	
Resource	Accounting_Period	Center	Account_Description	Amount	Quantity
1000	200206	265	Oth Pwr - Mtc Gen Elec Equip	$3,578.60	69
			Other Power - Mtc Structures	$613.70	12
			Other Power - Oper Gen Exp	$12,922.89	243
			Other Power - Oper Misc Exp	$39.77	0
		267	Oth Pwr - Mtc Gen Elec Equip	$1,616.74	26
			Other Power - Oper Gen Exp	$7,230.02	149
			Other Power - Oper Misc Exp	$37.77	0
		2RP	Other Power - Oper Sup & Eng	$3,052.17	50
		2RS	Other Power - Oper Misc Exp	$791.18	54
			Other Power - Oper Sup & Eng	$2,890.70	59
		ARQ	Other Power - Oper Misc Exp	$336.00	10
		POF	Other Power - Oper Sup & Eng	$453.44	2
		PW1	Other Power - Oper Misc Exp	$238.84	10
			Other Power - Oper Sup & Eng	-$11,558.84	-221
		TEF	Oth Pwr - Mtc Gen Elec Equip	$1,513.43	34
			Other Power - Oper Misc Exp	$299.77	9
	200206 Total			$24,738.96	515
	200207	191	Other Power - Oper Sup & Eng	$384.80	4
		25W		$175.39	4
		265	Oth Pwr - Mtc Gen Elec Equip	$2,494.62	49
			Other Power - Mtc Structures	$213.53	4
			Other Power - Oper Gen Exp	$24,783.11	440
			Other Power - Oper Misc Exp	$1,827.98	37
		267	Oth Pwr - Mtc Gen Elec Equip	-$135.84	2
			Other Power - Oper Gen Exp	$2,509.39	47
			Other Power - Oper Misc Exp	$763.24	16
		290	Other Power - Oper Gen Exp	$1,950.07	39
			Other Power - Oper Misc Exp	$2,142.77	48
		2RP	Other Power - Oper Sup & Eng	$3,566.81	67
		2RS	Other Power - Oper Misc Exp	-$13.88	0
			Other Power - Oper Sup & Eng	$2,607.72	63
		ARQ	Other Power - Oper Misc Exp	$2,477.81	47
		POF	Other Power - Oper Sup & Eng	$432.60	2
		PW1	Other Power - Oper Misc Exp	$262.73	11
			Other Power - Oper Sup & Eng	$1,182.77	18
		TEF	Oth Pwr - Mtc Gen Elec Equip	$392.80	12
	200207 Total			$48,018.42	910
	200208	104	Other Power - Oper Misc Exp	$86.52	4
		191	Other Power - Oper Sup & Eng	$398.20	4
		25W		$266.52	5
		265	Oth Pwr - Mtc Gen Elec Equip	$3,593.89	62
			Other Power - Mtc Structures	$235.13	4
			Other Power - Oper Gen Exp	$24,962.86	442
		267	Oth Pwr - Mtc Gen Elec Equip	$726.28	14
			Other Power - Oper Gen Exp	$6,807.47	127
		290	Other Power - Oper Gen Exp	$10,124.28	199
		2RP	Other Power - Oper Sup & Eng	$3,584.42	65
		2RS	Other Power - Oper Misc Exp	$539.08	13
			Other Power - Oper Sup & Eng	$3,014.49	69
		ARQ	Other Power - Oper Misc Exp	$144.84	4
		CBW	Oth Pwr - Mtc Gen Elec Equip	$266.93	8
			Other Power - Oper Gen Exp	$50.05	2
		POF	Other Power - Oper Sup & Eng	$297.46	1
		PW1	Other Power - Oper Misc Exp	$214.95	9
			Other Power - Oper Sup & Eng	$1,265.27	18

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				$ and Units	
Resource	Accounting_Period	Center	Account_Description	Amount	Quantity
1000	200208 Total			$56,578.64	1,050
	200209	104	Other Power - Oper Misc Exp	$2,867.98	51
		191	Other Power - Oper Sup & Eng	$374.57	4
		25W		$211.96	4
		265	Oth Pwr - Mtc Gen Elec Equip	$3,424.76	71
			Other Power - Mtc Structures	$90.80	2
			Other Power - Oper Gen Exp	$15,430.85	292
		267	Oth Pwr - Mtc Gen Elec Equip	$1,290.67	29
			Other Power - Oper Gen Exp	$4,142.13	86
		2RP	Other Power - Oper Misc Exp	$209.35	4
			Other Power - Oper Sup & Eng	$3,370.70	57
		2RS	Other Power - Oper Sup & Eng	$2,047.47	45
		ARQ	Other Power - Oper Misc Exp	$142.24	5
		POF	Other Power - Oper Sup & Eng	$317.50	2
		PW1	Other Power - Oper Misc Exp	$214.96	9
			Other Power - Oper Sup & Eng	$1,566.18	19
	200209 Total			$35,702.12	679
	200210	104	Other Power - Oper Misc Exp	$2,287.00	45
		191	Other Power - Oper Sup & Eng	$402.68	5
		25W		$293.08	6
		265	Oth Pwr - Mtc Gen Elec Equip	$7,858.30	178
			Other Power - Mtc Structures	$429.68	10
			Other Power - Oper Gen Exp	$3,312.55	70
		267	Oth Pwr - Mtc Gen Elec Equip	$3,378.97	75
			Other Power - Oper Gen Exp	$1,014.10	22
		2RP	Oth Pwr - Mtc Gen Elec Equip	$354.26	8
			Other Power - Oper Sup & Eng	$2,669.70	50
		2RS	Other Power - Oper Sup & Eng	$1,544.84	41
		ARQ	Other Power - Oper Misc Exp	$856.24	17
		PM8	Other Power - Oper Misc Exp	$1,120.05	21
		POF	Other Power - Oper Sup & Eng	$453.53	2
		PW1	Other Power - Oper Misc Exp	$226.91	10
			Other Power - Oper Sup & Eng	$1,547.33	21
	200210 Total			$27,749.22	579
	200211	104	Other Power - Oper Misc Exp	$1,433.29	27
		191	Other Power - Oper Sup & Eng	$354.87	4
		25W		$237.25	4
		265	Oth Pwr - Mtc Gen Elec Equip	$2,318.98	55
			Other Power - Oper Gen Exp	$1,054.08	25
		267	Oth Pwr - Mtc Gen Elec Equip	$817.33	19
			Other Power - Oper Gen Exp	$255.39	6
		2RP	Other Power - Oper Misc Exp	$209.35	4
			Other Power - Oper Sup & Eng	$3,088.68	54
		2RS	Other Power - Oper Sup & Eng	$1,932.93	43
		ARQ	Other Power - Oper Misc Exp	-$1.29	0
		POF	Other Power - Oper Sup & Eng	$385.51	2
		PW1	Other Power - Oper Misc Exp	$179.14	8
			Other Power - Oper Sup & Eng	$1,422.84	17
		TE3	Oth Pwr - Mtc Gen Elec Equip	$300.70	8
	200211 Total			$13,989.05	276
	200212	104	Other Power - Oper Misc Exp	$967.09	16
		191	Other Power - Oper Sup & Eng	$361.61	4
		25W		$125.19	3
		265	Oth Pwr - Mtc Gen Elec Equip	$600.94	14
			Other Power - Oper Gen Exp	$1,252.31	28

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				$ and Units	
Resource	Accounting_Period	Center	Account_Description	Amount	Quantity
1000	200212	2RP	Other Power - Oper Sup & Eng	$1,651.29	30
		2RS	Other Power - Oper Sup & Eng	$2,164.75	50
		POF	Other Power - Oper Sup & Eng	$317.42	2
		PW1	Other Power - Oper Misc Exp	$214.96	9
			Other Power - Oper Sup & Eng	$1,193.88	16
		TEF	MAINTENANCE OF STATION EQUIPME	$773.49	22
	200212 Total			$9,622.93	193
1000 Total				$367,629.31	7,344
1050	200209	191	Other Power - Oper Sup & Eng	$93.77	0
		POF	Other Power - Oper Sup & Eng	$93.91	0
		PW1	Other Power - Oper Sup & Eng	$826.69	0
	200209 Total			$1,014.37	0
	200210	191	Other Power - Oper Sup & Eng	$2.62	0
		POF	Other Power - Oper Sup & Eng	$2.63	0
		PW1	Other Power - Oper Sup & Eng	-$498.99	0
	200210 Total			-$493.74	0
1050 Total				$520.63	0
1200	200203	CDP	Oth Pwr - Mtc Gen Elec Equip	-$621.68	0
			Other Power - Oper Misc Exp	$28.98	0
	200203 Total			-$592.70	0
	200204	CDP	Oth Pwr - Mtc Gen Elec Equip	$194.82	0
	200204 Total			$194.82	0
	200205	CDP	Oth Pwr - Mtc Gen Elec Equip	$8.47	0
	200205 Total			$8.47	0
	200206	CDP	Oth Pwr - Mtc Gen Elec Equip	$411.36	0
	200206 Total			$411.36	0
	200207	CDP	Oth Pwr - Mtc Gen Elec Equip	$1,758.07	0
	200207 Total			$1,758.07	0
	200208	CDP	Oth Pwr - Mtc Gen Elec Equip	$560.78	0
	200208 Total			$560.78	0
	200209	CDP	Oth Pwr - Mtc Gen Elec Equip	$158.88	0
	200209 Total			$158.88	0
	200210	CDP	Oth Pwr - Mtc Gen Elec Equip	$10.79	0
	200210 Total			$10.79	0
	200211	CDP	Mtc Station Equip Swtchyd	$50.62	0
			Oth Pwr - Mtc Gen Elec Equip	$4,709.00	0
	200211 Total			$4,759.62	0
	200212	CDP	Other Power - Oper Misc Exp	$228.00	0
	200212 Total			$228.00	0
1200 Total				$7,498.09	0
1410	200201	ARQ	Other Power - Oper Misc Exp	$23.93	0
	200201 Total			$23.93	0
	200202	CDP	Oth Pwr - Mtc Gen Elec Equip	$2,649.50	0
	200202 Total			$2,649.50	0
	200203	CDP	Oth Pwr - Mtc Gen Elec Equip	$3,490.00	0
	200203 Total			$3,490.00	0
	200204	ARQ	Other Power - Oper Misc Exp	$71.78	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$13,923.29	0
			Other Power - Oper Misc Exp	$600.00	0
	200204 Total			$14,595.07	0
	200205	CDP	Oth Pwr - Mtc Gen Elec Equip	$2,890.00	0
	200205 Total			$2,890.00	0
	200206	ARQ	Other Power - Oper Misc Exp	$97.49	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$2,186.60	0
	200206 Total			$2,284.09	0

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				$ and Units	
Resource	Accounting_Period	Center	Account_Description	Amount	Quantity
1410	200207	CDP	Other Power - Oper Misc Exp	$8,400.00	0
	200207 Total			$8,400.00	0
	200208	CDP	Oth Pwr - Mtc Gen Elec Equip	$442.00	0
			Other Power - Oper Misc Exp	$2,650.75	0
	200208 Total			$3,092.75	0
	200209	CDP	Other Power - Oper Misc Exp	$623.00	0
	200209 Total			$623.00	0
	200210	ARQ	Other Power - Oper Misc Exp	$123.13	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$14,960.00	0
	200210 Total			$15,083.13	0
	200212	ARQ	Other Power - Oper Misc Exp	$73.88	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$7,002.86	0
			Other Power - Oper Misc Exp	$290.00	0
	200212 Total			$7,366.74	0
1410 Total				$60,498.21	0
1420	200202	CDP	Other Power - Oper Misc Exp	$544.24	0
	200202 Total			$544.24	0
	200203	CDP	Other Power - Oper Misc Exp	$283.36	0
	200203 Total			$283.36	0
	200204	CDP	Other Power - Oper Misc Exp	$177.32	0
	200204 Total			$177.32	0
	200205	CDP	Other Power - Oper Misc Exp	-$111.76	0
	200205 Total			-$111.76	0
	200206	CDP	Other Power - Oper Misc Exp	$180.18	0
	200206 Total			$180.18	0
	200207	CDP	Other Power - Oper Misc Exp	$511.28	0
	200207 Total			$511.28	0
	200208	CDP	Other Power - Oper Misc Exp	$180.18	0
	200208 Total			$180.18	0
	200209	CDP	Other Power - Oper Misc Exp	$171.60	0
	200209 Total			$171.60	0
	200212	CDP	Other Power - Oper Misc Exp	$171.60	0
	200212 Total			$171.60	0
1420 Total				$2,108.00	0
1430	200201	CDP	Oth Pwr - Mtc Gen Elec Equip	$1,332.99	0
			Other Power - Oper Misc Exp	$973.13	0
		CDZ	Alloc fr CinServ - A&G Non Lbr	-$1,240.00	0
	200201 Total			$1,066.12	0
	200202	CDP	ADMIN&GENL OFF SUPP & EXP -ELE	$1.05	0
			Oth Pwr - Mtc Gen Elec Equip	$2,620.15	0
			Other Power - Oper Gen Exp	$9,980.00	0
			Other Power - Oper Misc Exp	$1,248.61	0
	200202 Total			$13,849.81	0
	200203	CDP	Oth Pwr - Mtc Gen Elec Equip	$2,129.97	0
			Other Power - Oper Misc Exp	$954.54	0
		PW1	Other Power - Oper Misc Exp	$1,824.98	0
	200203 Total			$4,909.49	0
	200204	CDP	Oth Pwr - Mtc Gen Elec Equip	$3,055.31	0
			Other Power - Oper Gen Exp	$173.88	0
			Other Power - Oper Misc Exp	$2,022.66	0
	200204 Total			$5,251.85	0
	200205	267	Oth Pwr - Mtc Gen Elec Equip	$90.37	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$4,479.54	0
			Other Power - Oper Gen Exp	$10,940.00	0
			Other Power - Oper Misc Exp	$3,098.08	0

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				$ and Units	
Resource	Accounting_Period	Center	Account_Description	Amount	Quantity
1430	200205 Total			$18,607.99	0
	200206	CDP	Oth Pwr - Mtc Gen Elec Equip	$468.36	0
			Other Power - Mtc Structures	$1,250.00	0
			Other Power - Oper Gen Exp	$499.69	0
			Other Power - Oper Misc Exp	$2,037.24	0
	200206 Total			$4,255.29	0
	200207	CDP	Oth Pwr - Mtc Gen Elec Equip	$14,542.31	0
			Other Power - Mtc Structures	$900.00	0
			Other Power - Oper Gen Exp	$368.15	0
			Other Power - Oper Misc Exp	$660.75	0
	200207 Total			$16,471.21	0
	200208	CDP	Oth Pwr - Mtc Gen Elec Equip	$123,845.06	0
			Other Power - Mtc Structures	$3,089.00	0
			Other Power - Oper Gen Exp	$28,500.00	0
			Other Power - Oper Misc Exp	$266.66	0
		CDZ	Oth Pwr - Mtc Gen Elec Equip	$9,583.99	0
	200208 Total			$165,284.71	0
	200209	CDP	Oth Pwr - Mtc Gen Elec Equip	$59,705.78	0
			Other Power - Mtc Structures	$1,589.28	0
			Other Power - Oper Gen Exp	-$28,500.00	0
			Other Power - Oper Misc Exp	$2,262.55	0
	200209 Total			$35,057.61	0
	200210	CDP	Oth Pwr - Mtc Gen Elec Equip	$14,384.20	0
			Other Power - Mtc Structures	$1,222.50	0
			Other Power - Oper Gen Exp	$1,223.56	0
			Other Power - Oper Misc Exp	$28.80	0
	200210 Total			$16,859.06	0
	200211	CDP	Oth Pwr - Mtc Gen Elec Equip	$1,935.24	0
			Other Power - Mtc Structures	$3,537.50	0
			Other Power - Oper Misc Exp	$1,903.46	0
	200211 Total			$7,376.20	0
	200212	CDP	Oth Pwr - Mtc Gen Elec Equip	$6,707.33	0
			Other Power - Mtc Structures	$132.50	0
			Other Power - Oper Misc Exp	$560.46	0
	200212 Total			$7,400.29	0
1430 Total				$296,389.63	0
1440	200202	CDP	Other Power - Oper Misc Exp	$337.00	0
	200202 Total			$337.00	0
	200204	PV8	MISC OTH PWR GE - SALARY & WAG	$680.00	0
	200204 Total			$680.00	0
	200205	PV8	MISC OTH PWR GE - SALARY & WAG	$365.55	0
	200205 Total			$365.55	0
	200206	CDP	Other Power - Oper Misc Exp	$3,370.06	0
	200206 Total			$3,370.06	0
	200207	CDP	Other Power - Oper Gen Exp	$54.00	0
	200207 Total			$54.00	0
	200212	COA	Alloc fr CinServ - A&G Out Srv	$1,182.50	0
	200212 Total			$1,182.50	0
1440 Total				$5,989.11	0
1460	200201	107	Other Power - Oper Misc Exp	$5.75	0
		2RP	Other Power - Oper Misc Exp	$230.88	0
	200201 Total			$236.63	0
	200202	267	Oth Pwr - Mtc Gen Elec Equip	$128.10	0
		2RP	Other Power - Oper Misc Exp	$194.50	0
	200202 Total			$322.60	0

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				$ and Units	
Resource	Accounting_Period	Center	Account_Description	Amount	Quantity
1460	200203	265	Other Power - Oper Misc Exp	$120.00	0
		2RP	Other Power - Oper Misc Exp	$83.00	0
	200203 Total			$203.00	0
	200204	2RP	Other Power - Oper Misc Exp	$378.76	0
		PW1	Oth Pwr - Mtc Gen Elec Equip	$72.81	0
	200204 Total			$451.57	0
	200205	2RP	Other Power - Oper Misc Exp	$115.63	0
	200205 Total			$115.63	0
	200206	2RP	Other Power - Oper Misc Exp	$74.29	0
		PW1	Other Power - Oper Misc Exp	$24.60	0
	200206 Total			$98.89	0
	200207	290	Other Power - Oper Misc Exp	$183.00	0
		2RP	Other Power - Oper Misc Exp	$31.21	0
	200207 Total			$214.21	0
	200208	290	Other Power - Oper Misc Exp	$558.15	0
		2RP	Other Power - Oper Misc Exp	$114.27	0
	200208 Total			$672.42	0
	200209	104	Other Power - Oper Misc Exp	$9.75	0
		2RP	Other Power - Oper Misc Exp	$21.16	0
	200209 Total			$30.91	0
	200210	2RP	Other Power - Oper Misc Exp	$90.89	0
	200210 Total			$90.89	0
	200212	2RP	Other Power - Oper Misc Exp	$51.28	0
	200212 Total			$51.28	0
1460 Total				$2,488.03	0
1470	200201	107	Other Power - Oper Misc Exp	$45.62	0
		25W		$182.87	0
		265	Other Power - Oper Misc Exp	$93.72	0
		267	Other Power - Oper Misc Exp	$12.05	0
		2RP	Other Power - Oper Misc Exp	$1,061.98	0
	200201 Total			$1,396.24	0
	200202	267	Oth Pwr - Mtc Gen Elec Equip	$304.80	0
		2RP	Other Power - Oper Misc Exp	$1,810.89	0
	200202 Total			$2,115.69	0
	200203	265	Other Power - Oper Misc Exp	$509.95	0
		2RP	Donations	$500.00	0
			Other Power - Oper Misc Exp	$2,607.21	0
	200203 Total			$3,617.16	0
	200204	2RP	Other Power - Oper Misc Exp	$2,497.64	0
		PW1	Oth Pwr - Mtc Gen Elec Equip	$747.40	0
	200204 Total			$3,245.04	0
	200205	2RP	Other Power - Oper Misc Exp	$1,062.09	0
		PW1	Oth Pwr - Mtc Gen Elec Equip	$204.40	0
	200205 Total			$1,266.49	0
	200206	2RP	Other Power - Oper Misc Exp	$939.88	0
		2RS	Other Power - Oper Misc Exp	$21.86	0
		ARQ	Other Power - Oper Misc Exp	$108.25	0
		PW1	Other Power - Oper Misc Exp	$102.20	0
		TEF	Oth Pwr - Mtc Gen Elec Equip	$219.00	0
	200206 Total			$1,391.19	0
	200207	25W		$92.71	0
		290	Other Power - Oper Misc Exp	$554.46	0
		2RP	Oth Pwr - Mtc Gen Elec Equip	$9.92	0
			Other Power - Oper Misc Exp	$1,063.05	0
		TEF	Oth Pwr - Mtc Gen Elec Equip	$99.84	0

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				$ and Units	
Resource	Accounting_Period	Center	Account_Description	Amount	Quantity
1470	200207 Total			$1,819.98	0
	200208	290	Other Power - Oper Misc Exp	$1,291.60	0
		2RP	Other Power - Oper Misc Exp	$886.34	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$158.70	0
		TEF	Oth Pwr - Mtc Gen Elec Equip	$69.35	0
	200208 Total			$2,405.99	0
	200209	104	Other Power - Oper Misc Exp	$49.64	0
		2RP	Other Power - Oper Misc Exp	$964.73	0
		PM8	Other Power - Oper Misc Exp	$232.81	0
	200209 Total			$1,247.18	0
	200210	2RP	Other Power - Oper Misc Exp	$870.80	0
		ARQ	Other Power - Oper Misc Exp	$83.95	0
	200210 Total			$954.75	0
	200211	2RP	Donations	$500.00	0
			Other Power - Oper Misc Exp	$602.25	0
		ARQ	Other Power - Oper Misc Exp	$4.81	0
		TE3	Oth Pwr - Mtc Gen Elec Equip	$105.85	0
	200211 Total			$1,212.91	0
	200212	2RP	Other Power - Oper Misc Exp	$1,011.05	0
		TEF	MAINTENANCE OF STATION EQUIPME	$32.48	0
	200212 Total			$1,043.53	0
1470 Total				$21,716.15	0
1480	200201	25W		$5.39	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$28.38	0
			Other Power - Oper Misc Exp	$14,341.73	0
		CDZ	Oth Pwr - Mtc Gen Elec Equip	$24.66	0
			Other Power - Oper Misc Exp	$396.62	0
		PWO	Alloc fr CinServ - A&G Non Lbr	$560.37	0
	200201 Total			$15,357.15	0
	200202	25W		$1,077.76	0
		2RP	Other Power - Oper Misc Exp	$16.21	0
		CDP	Other Power - Oper Misc Exp	$745.11	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
		PWO	Alloc fr CinServ - A&G Non Lbr	$81.21	0
	200202 Total			$2,337.79	0
	200203	25W		$166.13	0
		CDP	Alloc fr CinServ - A&G Non Lbr	$739.29	0
			Other Power - Oper Misc Exp	$31,304.79	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
		PWO	Alloc fr CinServ - A&G Non Lbr	-$641.58	0
	200203 Total			$31,986.13	0
	200204	25W		$390.02	0
		CDP	Alloc fr CinServ - A&G Non Lbr	$97.71	0
			Oth Pwr - Mtc Gen Elec Equip	$28.18	0
			Other Power - Oper Gen Exp	$63.00	0
			Other Power - Oper Misc Exp	$15,255.59	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
	200204 Total			$16,252.00	0
	200205	25W		$129.75	0
		CDP	Alloc fr CinServ - A&G Non Lbr	$97.71	0
			Other Power - Oper Misc Exp	$9,316.73	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
	200205 Total			$9,961.69	0
	200206	25W		$528.82	0
		2RP	Other Power - Oper Misc Exp	$69.02	0

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				$ and Units	
Resource	Accounting_Period	Center	Account_Description	Amount	Quantity
1480	200206	CDP	Alloc fr CinServ - A&G Non Lbr	$97.71	0
			Other Power - Oper Misc Exp	$11,177.37	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
	200206 Total			$12,290.42	0
	200207	25W		$118.34	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$1,010.00	0
			Other Power - Oper Gen Exp	$118.00	0
			Other Power - Oper Misc Exp	$10,828.38	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
	200207 Total			$12,492.22	0
	200208	25W		$268.56	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$693.66	0
			Other Power - Oper Misc Exp	$10,004.90	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
	200208 Total			$11,384.62	0
	200209	25W		$19.20	0
		2RP	Other Power - Oper Misc Exp	$94.25	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$12.88	0
			Other Power - Oper Misc Exp	$9,658.08	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
	200209 Total			$10,201.91	0
	200210	25W		$183.54	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$108.00	0
			Other Power - Oper Misc Exp	$11,564.72	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
	200210 Total			$12,273.76	0
	200211	25W		$112.29	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$13.75	0
			Other Power - Oper Misc Exp	$9,175.88	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
	200211 Total			$9,719.42	0
	200212	25W		$129.40	0
		CDP	Oth Pwr - Mtc Gen Elec Equip	$268.04	0
			Other Power - Oper Misc Exp	$6,976.30	0
		CDZ	Other Power - Oper Misc Exp	$417.50	0
	200212 Total			$7,791.24	0
1480 Total				$152,048.35	0
1500	200201	CDP	Insurance Expense	$11,279.16	0
			Other Power - Oper Misc Exp	$199.63	0
		VMP	3PT - Other Pwr - Op Misc Exp	$.00	0
	200201 Total			$11,478.79	0
	200202	CDP	Insurance Expense	-$11,279.16	0
			Other Power - Oper Misc Exp	$2,605.28	0
	200202 Total			-$8,673.88	0
	200203	CDP	Other Power - Oper Misc Exp	$2,137.40	0
		ECE	A&G SALARIES & BENEFITS - ELEC	-$579.20	0
	200203 Total			$1,558.20	0
	200204	CDP	Other Power - Oper Misc Exp	$3,965.60	0
	200204 Total			$3,965.60	0
	200205	25W		-$15.04	0
		CDP	Other Power - Oper Misc Exp	$4,539.29	0
	200205 Total			$4,524.25	0
	200206	CDP	Other Power - Oper Misc Exp	$2,181.21	0
	200206 Total			$2,181.21	0
	200207	CDP	Oth Pwr - Mtc Gen Elec Equip	$201.90	0

Attachment OUCC/PSI 6-182-I

				$ and Units	
Resource	Accounting_Period	Center	Account_Description	Amount	Quantity
1500	200207	CDP	Other Power - Oper Misc Exp	$4,361.62	0
	200207 Total			$4,563.52	0
	200208	290	Other Power - Oper Gen Exp	$267.15	0
			Other Power - Oper Misc Exp	$328.80	0
		CDP	Other Power - Oper Misc Exp	$6,077.04	0
	200208 Total			$6,672.99	0
	200209	CDP	Other Power - Oper Misc Exp	$7,843.54	0
	200209 Total			$7,843.54	0
	200210	CDP	Other Power - Oper Misc Exp	$4,259.09	0
	200210 Total			$4,259.09	0
	200211	25W		-$12.56	0
		CDP	Other Power - Oper Misc Exp	$2,591.21	0
	200211 Total			$2,578.65	0
	200212	CDP	Other Power - Oper Misc Exp	$1,333.36	0
	200212 Total			$1,333.36	0
1500 Total				$42,285.32	0
Grand Total				$959,170.83	7,344

Labor (resource 1000 & 1080)	$367,629.31
Non-labor	591,541.52
64.24%	$380,006.27

Total 2001 $901,755
2002 looks representative

09603-016804

EMBU O&M for PSI - Actual
Twelve Months Ended 9/30/02
Rate Case Reference Code: EM1

TOTAL ACTUALS	500	501	502	504	505	506	507	510	511	512	513	514	535
Cayuga Station Total	986,880.42	1,369,867.97	1,210,645.12	(238,711.28)	834,834.25	2,015,125.90	-	1,373,054.78	1,229,107.01	5,384,235.23	1,407,837.31	492,632.13	-
Unit 1	493,376.88	672,568.64	604,991.37	(119,355.68)	418,755.45	1,007,507.75	-	686,152.98	620,716.00	2,557,708.27	774,844.44	269,755.80	-
Unit 2	493,238.27	697,265.90	605,587.80	(119,355.60)	414,870.85	1,007,259.72	-	684,807.04	608,391.01	2,825,982.84	631,975.44	222,887.78	-
Unit 3	265.27	15.43	85.95	-	207.85	358.43	-	294.78	-	544.32	1,017.43	188.57	-
Gallagher/Markland Station Total	2,024,006.07	916,726.11	455,154.01	19.00	1,785,939.84	1,780,672.99	7,300.00	248,825.87	731,523.05	3,685,085.66	899,231.02	517,287.02	-
Unit 1	503,333.94	231,384.81	117,676.50	4.75	452,072.31	435,193.78	-	54,920.45	181,525.77	886,736.58	141,300.18	127,791.03	-
Unit 2	503,252.15	229,169.33	118,523.12	4.75	452,046.07	435,218.41	-	54,329.95	181,937.13	845,849.33	114,786.68	126,338.28	-
Unit 3	502,986.60	228,219.58	109,268.49	4.75	440,955.64	434,786.54	-	54,132.11	181,148.88	792,894.39	178,822.48	131,069.81	-
Unit 4	512,639.85	227,862.65	109,360.23	4.75	440,865.82	435,488.86	-	83,741.74	184,271.27	1,177,219.41	464,428.78	128,209.30	-
Markland 1	398.22	23.18	98.89	-	-	7,049.18	2,433.00	516.20	879.96	368.89	37.83	2,558.76	-
Markland 2	997.09	23.18	98.89	-	-	6,557.04	2,433.00	492.58	879.96	8.53	37.83	747.88	-
Markland 3	398.22	23.18	98.89	-	-	6,379.38	2,433.82	492.57	880.08	8.53	37.84	575.98	-
Gibson Station Total	2,521,817.71	4,373,568.02	9,859,747.89	-	2,187,177.84	6,004,979.84	-	2,299,829.50	3,003,398.52	19,585,562.66	5,765,897.03	1,885,946.66	-
Unit 1	539,880.20	884,876.07	830,997.35	-	476,032.16	1,280,989.86	-	486,401.05	613,774.52	4,126,830.40	792,510.08	380,805.50	-
Unit 2	538,056.82	876,579.57	857,069.32	-	479,987.64	1,271,160.54	-	481,105.57	606,481.68	3,009,400.78	327,131.29	369,246.24	-
Unit 3	543,551.31	880,027.93	841,590.28	-	474,480.07	1,240,805.70	-	571,142.51	700,790.11	5,681,566.63	4,236,766.46	363,492.66	-
Unit 4	599,612.24	1,161,160.65	4,777,702.47	-	493,431.29	1,487,714.40	-	511,244.45	700,836.42	3,999,212.21	311,259.51	517,018.78	-
Unit 5 Share	300,717.14	571,123.80	2,552,368.47	-	263,246.68	724,309.65	-	249,736.92	381,533.79	2,566,552.64	98,229.69	235,383.50	-
IMPA Credits	(149,907.96)	(284,706.30)	(1,259,795.91)	-	(131,228.94)	(363,867.49)	-	(124,493.78)	(190,185.24)	(1,279,225.59)	(49,775.63)	(117,339.07)	-
WVPA Credits	(150,208.47)	(285,277.29)	(1,237,097.80)	-	(131,491.07)	(384,836.96)	-	(124,743.45)	(190,576.51)	(1,281,760.30)	(49,875.42)	(117,574.39)	-
Unit 5 Whole	600,833.57	1,141,107.39	5,049,262.18	-	525,987.59	1,492,814.00	-	498,973.15	762,305.54	5,127,567.53	197,860.74	470,296.98	-
Wabash River Station Total	1,284,899.62	1,365,677.44	2,418,987.17	-	1,921,739.54	1,945,044.61	-	1,155,650.51	654,946.02	4,675,024.25	1,297,969.08	391,059.37	-
Unit 2	163,617.13	176,372.06	365,682.60	-	306,985.61	271,568.57	-	146,540.42	117,716.31	766,657.57	77,413.89	52,531.16	-
Unit 3	164,284.91	168,096.10	339,298.02	-	343,517.31	248,535.65	-	145,889.45	117,151.05	632,487.70	679,541.52	50,824.04	-
Unit 4	163,591.18	180,725.66	339,964.68	-	344,250.82	247,231.93	-	157,701.14	117,575.36	659,919.77	189,270.00	48,870.02	-
Unit 5	183,054.90	193,256.43	353,954.15	-	326,949.39	273,998.11	-	166,260.85	142,695.16	775,439.34	125,435.51	55,003.31	-
Unit 6	610,351.50	647,226.99	1,019,887.72	-	510,036.41	903,710.35	-	537,258.65	381,183.97	1,840,319.87	223,392.94	183,778.96	-
Unit 7	-	-	-	-	-	-	-	-	(1,375.83)	-	2,915.22	50.98	-
Cayuga CT Total	2,772.80	154.79	859.51	-	-	7,864.77	-	3,457.98	-	63.03	-	1,214.90	-
Connersville CT Total	2,288.62	369.64	588.74	-	-	8,435.30	-	2,980.52	-	49.05	-	319.81	-
Miami-Wabash CT Total	2,504.35	148.10	622.37	-	-	5,623.31	-	4,412.78	-	53.68	-	257.73	-
W.R. Repowering Total	8,620.94	4,080.77	18,101.95	-	194.12	87,739.32	-	23,468.09	32,369.15	11,098.18	11,472.85	32,665.16	-
Noblesville Total	407,448.19	159,034.79	299,047.87	-	398,858.27	885,756.74	-	178,223.60	182,063.13	550,067.30	80,783.62	208,015.63	-
Edwardsport Total	816,373.27	264,186.13	1,043,122.14	-	315,714.56	676,245.51	-	288,847.08	188,847.38	1,010,005.93	138,054.34	118,564.72	-
Other	(141,476.26)	5,375.66	18,738.79	-	8,056.51	1,510,793.30	-	16,052.81	130,792.52	189,472.24	(13,823.82)	(288,125.17)	-
GRAND TOTAL	7,716,127.73	8,459,187.42	15,325,395.58	(238,692.28)	7,450,514.93	14,706,481.59	7,300.00	5,570,203.08	8,353,046.78	35,070,717.19	9,585,821.23	3,379,857.98	-

Noblesville 500 Accounts 3,159,566.35

Edwardsport moved to seasonal operation upon commercial ops Madison / Henry County.

09603-016739

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EMBU O&M for PSI - Actual
Twelve Months Ended 9/30/02
Rate Case Reference Code: EM1

TOTAL ACTUALS	536	538	540	542	543	544	545	546	547	548	549	551	552
Cayuga Station Total	-	-	-	-	-	-	-	-	-	-	47.04	-	-
Unit 1	-	-	-	-	-	-	-	-	-	-	23.52	-	-
Unit 2	-	-	-	-	-	-	-	-	-	-	23.52	-	-
Unit 3	-	-	-	-	-	-	-	-	-	-	-	-	-
Gallagher/Markland Station Total	112,034.41	227,042.81	49,956.00	18,532.92	11,371.40	441,840.94	64,690.08	-	-	(1,027.70)	47.12	-	-
Unit 1	(49.88)	-	-	1.86	5.49	520.47	68.77	-	-	(256.93)	11.78	-	-
Unit 2	(49.88)	-	-	1.88	5.49	520.47	68.77	-	-	(256.93)	11.78	-	-
Unit 3	(49.88)	-	-	1.86	5.49	520.47	68.77	-	-	(256.93)	11.78	-	-
Unit 4	(49.86)	-	-	1.87	5.47	520.36	68.74	-	-	(256.91)	11.78	-	-
Markland 1	37,407.49	75,673.26	16,650.36	6,174.78	4,299.41	327,920.15	21,024.16	-	-	-	-	-	-
Markland 2	37,407.49	75,673.26	16,650.36	6,174.78	3,524.81	58,404.22	20,948.88	-	-	-	-	-	-
Markland 3	37,418.93	75,696.05	16,655.28	6,176.71	3,525.44	53,434.80	22,442.01	-	-	-	-	-	-
Gibson Station Total	-	-	-	-	-	-	-	6,398.63	-	-	198.48	-	-
Unit 1	-	-	-	-	-	-	-	1,279.73	-	-	39.69	-	-
Unit 2	-	-	-	-	-	-	-	1,279.73	-	-	39.69	-	-
Unit 3	-	-	-	-	-	-	-	1,279.73	-	-	39.69	-	-
Unit 4	-	-	-	-	-	-	-	1,279.73	-	-	39.69	-	-
Unit 5 Share	-	-	-	-	-	-	-	1,279.71	-	-	39.72	-	-
IMPA Credits	-	-	-	-	-	-	-	-	-	-	-	-	-
WVPA Credits	-	-	-	-	-	-	-	-	-	-	-	-	-
Unit 5 Whole	-	-	-	-	-	-	-	1,279.71	-	-	39.72	-	-
Wabash River Station Total	-	-	-	-	-	-	-	-	-	1,605.21	919.51	-	111.81
Unit 2	-	-	-	-	-	-	-	-	-	229.84	433.53	-	14.12
Unit 3	-	-	-	-	-	-	-	-	-	229.84	70.99	-	14.12
Unit 4	-	-	-	-	-	-	-	-	-	229.84	70.99	-	14.12
Unit 5	-	-	-	-	-	-	-	-	-	256.69	79.17	-	15.80
Unit 6	-	-	-	-	-	-	-	-	-	859.40	264.83	-	52.85
Unit 7	-	-	-	-	-	-	-	-	-	-	-	-	-
Cayuga CT Total	-	-	-	-	-	-	-	54,706.35	-	51,390.85	23,657.26	11,617.42	1,054.78
Connersville CT Total	-	-	-	-	-	-	-	57,722.18	-	49,909.91	27,289.55	11,888.55	-
Miami-Wabash CT Total	-	-	-	-	-	-	-	61,460.24	-	39,432.17	19,278.11	12,876.82	888.50
W.R. Repowering Total	-	-	-	-	-	-	-	271,070.57	45,405.47	1,528,327.69	288,430.24	90,102.29	80,233.80
Noblesville Total	-	-	-	-	-	-	-	-	-	-	249.44	5,883.57	-
Edwardsport Total	-	-	-	-	-	-	-	-	-	-	834.72	5,882.28	-
Other	-	-	-	-	-	-	-	-	-	-	86.00	-	-
GRAND TOTAL	112,034.41	227,042.81	49,956.00	18,532.92	11,371.40	441,840.94	64,690.08	451,357.97	45,405.47	1,667,837.93	358,841.47	138,010.73	82,088.07

Noblesville 500 Accounts

09603-016740

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EMBU O&M for PSI - Actual
Twelve Months Ended 9/30/02
Rate Case Reference Code: EM1

TOTAL ACTUALS	553	554	556	557	562	565	568	569	570	571	573	586	590
Cayuga Station Total	30,816.95	740.91	-	(15,209.57)	-	-	-	-	13,877.98	-	-	-	-
Unit 1	1,633.07	367.01	-	(7,610.56)	-	-	-	-	6,735.84	-	-	-	-
Unit 2	2,339.88	373.90	-	(7,603.01)	-	-	-	-	7,142.14	-	-	-	-
Unit 3	26,844.00	-	-	4.00	-	-	-	-	-	-	-	-	-
Gallagher/Markland Station Total	8.12	-	-	285.24	-	-	-	-	97,035.58	-	-	-	-
Unit 1	1.86	-	-	87.69	-	-	-	-	25,375.47	-	-	-	-
Unit 2	1.88	-	-	86.82	-	-	-	-	24,492.88	-	-	-	-
Unit 3	1.88	-	-	88.33	-	-	-	-	23,534.16	-	-	-	-
Unit 4	1.88	-	-	86.40	-	-	-	-	23,633.07	-	-	-	-
Markland 1	0.20	-	-	6.00	-	-	-	-	-	-	-	-	-
Markland 2	0.20	-	-	6.00	-	-	-	-	-	-	-	-	-
Markland 3	0.20	-	-	6.00	-	-	-	-	-	-	-	-	-
Gibson Station Total	42.22	-	(10,821.20)	1,555.78	216.90	-	-	-	58,828.58	-	-	-	-
Unit 1	8.48	-	-	312.24	-	-	-	-	10,064.84	-	-	-	-
Unit 2	8.48	-	-	309.22	-	-	-	-	7,261.92	-	-	-	-
Unit 3	8.49	-	-	310.77	-	-	-	-	20,081.30	-	-	-	-
Unit 4	8.37	-	-	314.90	-	-	-	-	15,664.33	-	-	-	-
Unit 5 Share	8.40	-	(10,821.20)	308.65	216.90	-	-	-	3,756.19	-	-	-	-
IMPA Credits	-	-	(5,405.20)	-	108.34	-	-	-	(8,303.44)	-	-	-	-
WVPA Credits	-	-	(5,416.00)	-	108.56	-	-	-	(6,318.06)	-	-	-	-
Unit 5 Whole	8.40	-	-	308.65	(0.00)	-	-	-	18,375.69	-	-	-	-
Wabash River Station Total	22,018.89	8.59	-	323.60	-	-	-	-	31,983.74	-	-	-	35.47
Unit 2	2,215.45	0.84	-	42.20	-	-	-	-	8,745.81	-	-	-	4.50
Unit 3	1,262.75	0.84	-	39.27	-	-	-	-	7,430.68	-	-	-	4.50
Unit 4	1,133.19	0.84	-	43.74	-	-	-	-	4,939.40	-	-	-	4.50
Unit 5	1,447.56	0.94	-	45.87	-	-	-	-	3,301.72	-	-	-	5.07
Unit 6	4,923.94	3.13	-	152.92	-	-	-	-	9,546.33	-	-	-	16.90
Unit 7	11,034.00	-	-	-	-	-	-	-	-	-	-	-	-
Cayuga CT Total	49,752.00	3,082.03	-	40.00	-	-	-	-	768.04	-	-	-	-
Connersville CT Total	45,921.15	-	-	34.50	-	-	-	-	-	-	-	-	-
Miami-Wabash CT Total	16,727.95	-	-	37.75	-	-	-	-	-	-	-	-	-
W.R. Repowering Total	1,054,657.04	123,455.48	-	92.50	-	-	-	-	(700.89)	-	-	-	-
Noblesville Total	28.71	-	-	42.91	-	-	-	-	362.58	5,728.00	-	-	-
Edwardsport Total	2.16	-	-	73.95	-	-	-	-	5,878.24	-	-	-	-
Other	1,892.67	-	191.62	6,006,585.24	-	23,877,711.83	7.92	20.47	71,420.41	3,014.50	95,279.40	2,033.78	5.28
GRAND TOTAL	1,221,865.66	127,285.01	(10,629.58)	5,993,842.10	216.90	23,877,711.83	7.92	20.47	277,234.26	8,742.50	95,279.40	2,033.78	40.75

Noblesville 500 Accounts

09603-016741

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EMBU O&M for PSI - Actual
Twelve Months Ended 9/30/02
Rate Case Reference Code: EM1

TOTAL ACTUALS	592	598	901	902	909	910	911	920	921	922	923	924	925
Cayuga Station Total	-	14,615.89	-	-	-	-	928.20	119,224.64	14,927.96	-	25,737.35	-	29,275.73
Unit 1	-	7,406.87	-	-	-	-	464.13	59,694.66	7,412.17	-	12,933.69	-	14,531.09
Unit 2	-	7,209.02	-	-	-	-	464.07	59,405.87	7,471.74	-	12,603.37	-	14,731.92
Unit 3	-	-	-	-	-	-	-	124.11	44.05	-	(0.01)	-	12.72
Gallagher/Markland Station Total	-	-	-	-	-	-	-	74,207.68	35,732.12	-	14,516.83	-	27,716.91
Unit 1	-	-	-	-	-	-	-	18,412.31	8,895.64	-	3,629.15	-	6,831.39
Unit 2	-	-	-	-	-	-	-	18,412.31	8,883.79	-	3,629.15	-	6,831.39
Unit 3	-	-	-	-	-	-	-	18,412.31	8,877.14	-	3,629.15	-	6,998.66
Unit 4	-	-	-	-	-	-	-	18,411.97	8,877.37	-	3,629.15	-	6,998.17
Markland 1	-	-	-	-	-	-	-	188.26	66.06	-	0.01	-	19.10
Markland 2	-	-	-	-	-	-	-	188.26	66.06	-	0.01	-	19.10
Markland 3	-	-	-	-	-	-	-	188.26	66.06	-	0.01	-	19.10
Gibson Station Total	-	-	-	-	360.00	-	-	(1,232,717.93)	(429,394.45)	44,744.94	(404,875.37)	-	(27,543.13)
Unit 1	-	-	-	-	72.00	-	-	36,187.79	24,133.61	-	16,301.76	-	12,826.90
Unit 2	-	-	-	-	72.00	-	-	36,187.79	24,092.24	-	16,301.76	-	12,826.90
Unit 3	-	-	-	-	72.00	-	-	36,185.85	24,113.84	-	16,301.20	-	12,826.91
Unit 4	-	-	-	-	72.00	-	-	35,734.49	24,102.76	-	16,098.58	-	12,771.83
Unit 5 Share	-	-	-	-	72.00	-	-	(1,377,013.85)	(519,836.90)	44,744.94	(469,878.85)	-	(78,795.67)
IMPA Credits	-	-	-	-	-	-	-	(712,468.81)	(271,666.92)	22,350.00	(242,781.72)	-	(45,747.92)
WVPA Credits	-	-	-	-	-	-	-	(713,894.40)	(272,211.18)	22,394.94	(243,268.09)	-	(45,839.58)
Unit 5 Whole	-	-	-	-	72.00	-	-	49,347.38	24,041.20	-	16,171.18	-	12,791.83
Wabash River Station Total	568.49	-	-	-	-	-	-	80,819.12	27,817.38	-	17,274.49	-	28,312.50
Unit 2	-	-	-	-	-	-	-	10,298.12	3,556.21	-	2,206.50	-	3,349.31
Unit 3	-	-	-	-	-	-	-	10,298.12	3,518.07	-	2,206.50	-	3,349.31
Unit 4	568.49	-	-	-	-	-	-	10,298.12	3,577.41	-	2,206.50	-	3,349.31
Unit 5	-	-	-	-	-	-	-	11,491.00	3,950.60	-	2,453.26	-	3,742.92
Unit 6	-	-	-	-	-	-	-	38,433.67	13,217.07	-	8,201.73	-	12,521.65
Unit 7	-	-	-	-	-	-	-	-	-	-	-	-	-
Cayuga CT Total	-	-	-	-	-	-	-	3,635.89	446.93	-	-	-	1,063.15
Connersville CT Total	-	-	-	-	-	-	-	3,126.78	379.95	-	-	-	881.88
Miami-Wabash CT Total	-	-	-	-	-	-	-	3,421.96	415.69	-	-	-	943.29
W.R. Repowering Total	-	-	-	-	-	-	-	8,386.64	1,260.17	-	-	-	3,149.02
Noblesville Total	-	-	-	-	-	-	-	5,160.66	40,104.85	-	2,322.63	-	12,639.06
Edwardsport Total	-	-	-	-	-	-	-	9,190.73	3,180.07	-	4,137.15	-	7,838.19
Other	229.19	(4,113.09)	138.24	-	-	-	-	9,051,714.18	3,325,989.96	(20,599.82)	5,912,146.61	643,750.02	7,179.52
GRAND TOTAL	797.68	10,502.80	138.24	-	360.00	-	928.20	8,126,169.89	3,028,840.61	24,145.12	5,571,259.49	643,750.02	89,376.10

Noblesville 500 Accounts

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TOTAL ACTUALS	926	928	929	930.1	930.2	931	935	Grand Total
Cayuga Station Total	2,709,965.12	-	(100,302.44)	-	40,896.97	20,012.53	-	18,971,064.10
Unit 1	1,360,937.50	-	(50,151.25)	-	20,402.83	10,000.30	-	9,434,801.05
Unit 2	1,341,439.00	-	(50,151.19)	-	20,301.50	9,982.84	-	9,498,465.50
Unit 3	7,588.62	-	-	-	192.64	29.39	-	37,797.55
Gallagher/Markland Station Total	2,248,478.85	-	-	-	17,527.60	19,155.02	-	16,490,719.97
Unit 1	552,115.41	-	-	-	4,189.32	4,463.68	-	3,738,202.60
Unit 2	549,806.83	-	-	-	4,165.23	4,464.40	-	3,682,309.24
Unit 3	518,493.93	-	-	-	4,182.98	4,463.18	-	3,643,030.55
Unit 4	562,848.41	-	-	-	4,163.19	4,481.53	-	4,397,514.87
Markland 1	37,563.12	-	-	-	288.96	433.97	-	542,075.40
Markland 2	14,144.73	-	-	-	288.96	433.97	-	248,204.72
Markland 3	13,704.42	-	-	-	288.96	434.09	-	241,382.59
Gibson Station Total	7,111,749.27	-	11,759.90	14,603.82	(140,851.24)	(395,512.60)	(184,918.99)	61,935,549.30
Unit 1	1,406,655.61	-	-	2,920.76	21,029.24	6,770.57	-	11,953,500.40
Unit 2	1,324,688.87	-	-	2,920.76	21,014.94	6,756.81	-	10,269,980.58
Unit 3	1,735,670.69	-	-	2,920.76	21,021.98	6,753.98	-	17,631,800.43
Unit 4	1,993,566.30	-	-	2,920.76	20,822.95	6,767.73	-	16,689,358.82
Unit 5 Share	651,167.80	-	11,759.90	2,920.76	(224,740.35)	(422,561.67)	(184,918.99)	5,390,929.09
IMPA Credits	(707,334.54)	-	5,874.08	-	(122,685.14)	(214,449.18)	(82,377.00)	(6,353,421.18)
WVPA Credits	(708,752.04)	-	5,885.82	-	(122,930.76)	(214,879.37)	(82,541.99)	(6,340,931.71)
Unit 5 Whole	2,067,254.38	-	-	2,920.76	20,875.55	6,788.88	-	18,085,281.98
Wabash River Station Total	2,763,674.31	-	-	-	20,070.28	15,673.41	-	20,328,589.79
Unit 2	429,008.73	-	-	-	2,563.87	2,025.96	-	2,998,179.91
Unit 3	435,971.63	-	-	-	2,550.01	2,017.75	-	3,358,587.93
Unit 4	406,008.93	-	-	-	2,571.14	2,031.69	-	2,888,149.87
Unit 5	417,080.73	-	-	-	2,850.99	2,256.75	-	3,047,026.31
Unit 6	1,074,385.34	-	-	-	9,534.27	7,541.26	-	8,016,602.65
Unit 7	1,218.95	-	-	-	-	-	-	13,843.32
Cayuga CT Total	46,116.01	-	-	-	1,926.51	545.82	-	265,930.58
Connersville CT Total	42,228.98	-	-	-	1,881.61	446.08	-	254,482.78
Miami-Wabash CT Total	38,547.70	-	-	-	1,818.11	277.35	-	209,545.72
W.R. Repowering Total	476,804.74	-	-	-	4,470.27	5,778.08	-	4,206,733.44
Noblesville Total	577,255.48	-	-	-	2,874.24	4,374.14	-	3,804,098.75
Edwardsport Total	900,242.08	-	-	-	4,751.18	6,783.55	-	5,564,155.38
Other	7,137,526.65	787,475.00	-	-	1,808,652.49	708,485.41	14.97	80,450,858.21
GRAND TOTAL	24,052,586.59	787,475.00	(88,542.54)	14,603.82	1,563,598.02	388,218.79	(184,904.02)	192,493,726.00

Noblesville 500 Accounts

09603-016743

EMBU O&M for PSI - Actual
Twelve Months Ended 9/30/02
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	500 500	501 501	502 502	504 504	505 505	506 506	507 507	510 510	511 511	512 512	513 513	514 514	535 535	536 536	539 539	540 540
TOTAL ACTUALS																
Cayuga Station Total	986,880.42	1,369,867.97	1,210,645.12	(238,711.28)	834,634.25	2,015,125.90	-	1,373,054.78	1,229,107.01	5,384,235.23	1,407,837.31	492,632.13	-	-	-	-
Unit 1	493,376.68	672,566.64	604,991.37	(119,355.68)	419,755.45	1,007,507.75	-	686,152.06	620,716.00	2,657,708.27	774,644.44	269,755.80	-	-	-	-
Unit 2	493,238.27	697,285.50	605,587.80	(119,355.60)	414,870.95	1,007,259.72	-	684,607.04	608,391.01	2,825,982.64	631,975.44	222,687.78	-	-	-	-
Unit 3	265.27	15.43	65.95	-	207.85	358.43	-	294.78	-	544.32	1,017.43	188.57	-	-	-	-
Gallagher/Markland Station Total	2,024,986.07	918,726.11	455,154.01	19.00	1,785,939.84	1,760,872.99	7,300.00	249,825.67	731,323.05	3,689,085.66	899,231.02	517,287.02	-	112,934.41	227,042.61	48,956.00
Unit 1	503,333.94	231,384.81	117,675.50	4.75	452,072.31	435,193.78	-	54,920.45	181,525.77	868,736.58	141,300.18	127,791.03	-	(49.88)	-	-
Unit 2	503,252.15	229,189.33	118,523.12	4.75	452,046.07	435,218.41	-	54,329.95	181,937.13	845,849.33	114,766.68	126,336.28	-	(49.88)	-	-
Unit 3	502,986.60	228,219.58	109,268.49	4.75	440,955.84	434,766.54	-	54,132.11	181,148.88	792,894.39	176,622.48	131,069.81	-	(49.88)	-	-
Unit 4	512,639.85	227,862.85	109,390.23	4.75	440,865.62	435,488.68	-	83,741.74	184,271.27	1,177,219.41	464,428.78	128,209.30	-	(49.88)	-	-
Markland 1	398.22	23.18	98.89	-	-	7,049.18	2,433.09	516.29	879.98	368.89	37.63	2,556.76	-	37,407.49	75,673.28	16,850.38
Markland 2	997.09	23.18	98.89	-	-	6,557.04	2,433.09	492.56	879.98	8.53	37.63	747.88	-	37,407.49	75,673.28	16,850.38
Markland 3	398.22	23.18	98.89	-	-	6,379.36	2,433.82	492.57	880.06	8.53	37.64	575.08	-	37,418.93	75,696.05	16,855.28
Gibson Station Total	2,521,817.71	4,373,568.02	9,859,747.89	-	2,187,177.84	6,904,679.84	-	2,298,629.50	3,003,398.52	19,385,562.68	5,765,697.03	1,885,846.68	-	-	-	-
Unit 1	539,860.20	884,676.07	830,997.35	-	476,032.16	1,280,989.65	-	486,401.05	613,774.52	4,128,830.40	792,510.08	380,805.50	-	-	-	-
Unit 2	538,056.82	876,579.57	857,069.32	-	479,987.64	1,271,160.54	-	481,105.67	606,461.66	3,009,400.78	327,131.29	389,246.24	-	-	-	-
Unit 3	543,551.31	880,027.93	841,590.28	-	474,480.07	1,240,805.70	-	571,142.51	700,790.11	5,881,566.63	4,236,768.46	383,492.66	-	-	-	-
Unit 4	599,612.24	1,151,160.65	4,777,702.47	-	493,431.29	1,487,714.40	-	511,244.45	700,838.42	3,990,212.21	311,259.51	517,018.78	-	-	-	-
Unit 5 Share	300,717.14	571,123.80	2,552,388.47	-	263,246.68	724,309.55	-	249,735.92	381,533.79	2,566,552.64	98,229.69	235,383.50	-	-	-	-
IMPA Credits	(149,907.96)	(284,706.30)	(1,259,795.91)	-	(131,228.94)	(383,867.49)	-	(124,493.78)	(190,196.24)	(1,279,225.59)	(49,775.83)	(117,339.07)	-	-	-	-
WVPA Credits	(150,208.47)	(285,277.29)	(1,237,097.80)	-	(131,491.97)	(384,636.96)	-	(124,743.45)	(190,576.51)	(1,281,789.30)	(49,875.42)	(117,574.39)	-	-	-	-
Unit 5 Whole	600,833.57	1,141,107.39	5,049,282.18	-	525,987.59	1,492,814.00	-	498,973.15	762,305.54	5,127,567.53	197,880.74	470,296.96	-	-	-	-
Wabash River Station Total	1,284,899.62	1,365,677.44	2,418,987.17	-	1,921,739.54	1,945,044.81	-	1,155,850.31	854,946.02	4,675,024.25	1,297,940.08	381,859.37	-	-	-	-
Unit 2	163,617.13	176,372.06	365,882.60	-	398,985.61	271,568.57	-	146,540.42	117,716.31	786,857.57	77,413.89	52,531.16	-	-	-	-
Unit 3	164,284.91	168,096.10	339,298.02	-	343,517.31	246,535.65	-	145,889.45	117,151.05	832,487.70	679,541.52	50,824.04	-	-	-	-
Unit 4	163,591.18	180,725.86	339,964.68	-	344,250.82	247,231.93	-	157,701.14	117,575.36	659,910.77	189,270.00	48,870.92	-	-	-	-
Unit 5	183,054.90	193,256.43	353,954.15	-	326,949.39	273,998.11	-	168,260.85	142,695.16	775,439.34	125,435.51	65,003.31	-	-	-	-
Unit 6	610,351.50	647,226.99	1,019,887.72	-	510,036.41	903,710.35	-	537,258.65	361,183.97	1,840,319.87	223,392.94	183,778.98	-	-	-	-
Unit 7	-	-	-	-	-	-	-	-	(1,375.63)	-	2,915.22	50.98	-	-	-	-
Cayuga CT Total	2,772.80	154.79	659.51	-	-	7,884.77	-	3,457.96	-	93.03	-	1,314.90	-	-	-	-
Connersville CT Total	2,288.62	369.64	568.74	-	-	6,435.30	-	2,980.52	-	49.05	-	319.81	-	-	-	-
Miami-Wabash CT Total	2,504.35	146.10	622.37	-	-	5,923.31	-	4,412.79	-	53.68	-	297.73	-	-	-	-
W.R. Repowering Total	8,620.94	4,080.77	18,101.95	-	194.12	87,739.32	-	23,468.09	32,369.15	15,096.18	11,472.85	32,645.16	-	-	-	-
Noblesville Total	407,440.19	20,765.63	253,915.77	-	396,858.27	685,437.07	-	178,223.60	182,063.13	69,295.53	66,783.02	204,678.96	-	-	-	-
Edwardsport Total	616,373.27	264,186.13	1,043,122.14	-	315,714.58	876,245.51	-	268,647.08	188,847.38	1,010,905.93	136,054.34	118,584.72	-	-	-	-
Other	(141,476.26)	3,375.66	18,738.79	-	6,058.51	1,510,793.30	-	16,052.61	130,792.52	189,472.24	(13,823.82)	(268,125.17)	-	-	-	-
GRAND TOTAL	7,716,127.73	8,459,187.42	15,325,395.58	(238,692.28)	7,450,514.93	14,706,481.59	7,300.80	5,570,203.08	6,353,048.78	35,070,717.16	9,583,621.23	3,379,857.98	-	112,034.41	227,042.61	48,956.00

Edwardsport 500 accounts	4,648,032.41
Noblesville 500 accounts this schedule	2,527,736.98
Noblesville 500 accounts original schedule	3,159,566.35
Adjustment	(631,829.37)

No explanations given
follow-up DR submitted

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TOTAL ACTUALS	542 542	543 543	544 544	545 545	546 546	547 547	548 548	549 549	551 551	552 552	553 553	554 554	556 556	557 557	562 562	565 565
Cayuga Station Total	-	-	-	-	-	-	-	47.04	-	-	30,918.95	746.91	-	(15,209.97)	-	-
Unit 1	-	-	-	-	-	-	-	23.52	-	-	1,833.07	387.01	-	(7,610.56)	-	-
Unit 2	-	-	-	-	-	-	-	23.52	-	-	2,339.88	373.90	-	(7,603.01)	-	-
Unit 3	-	-	-	-	-	-	-	-	-	-	26,844.00	-	-	4.00	-	-
Gallagher/Markland Station Total	18,532.92	11,371.40	441,840.94	64,690.08	-	-	(1,027.70)	47.12	-	-	9.12	-	-	283.24	-	-
Unit 1	1.66	5.49	520.47	68.77	-	-	(256.93)	11.78	-	-	1.88	-	-	67.69	-	-
Unit 2	1.66	5.49	520.47	68.77	-	-	(256.93)	11.78	-	-	1.88	-	-	66.82	-	-
Unit 3	1.66	5.49	520.47	68.77	-	-	(256.93)	11.78	-	-	1.88	-	-	68.33	-	-
Unit 4	1.67	5.47	520.36	68.74	-	-	(256.91)	11.78	-	-	1.88	-	-	68.40	-	-
Markland 1	6,174.78	4,299.41	327,920.15	21,024.18	-	-	-	-	-	-	0.20	-	-	8.00	-	-
Markland 2	6,174.78	3,524.61	58,404.22	20,948.86	-	-	-	-	-	-	0.20	-	-	8.00	-	-
Markland 3	6,176.71	3,625.44	53,434.80	22,442.01	-	-	-	-	-	-	0.20	-	-	8.00	-	-
Gibson Station Total	-	-	-	-	8,398.83	-	-	198.48	-	-	42.22	-	(10,821.20)	1,555.78	216.90	-
Unit 1	-	-	-	-	1,279.73	-	-	39.69	-	-	8.48	-	-	312.24	-	-
Unit 2	-	-	-	-	1,279.73	-	-	39.69	-	-	8.48	-	-	309.22	-	-
Unit 3	-	-	-	-	1,279.73	-	-	39.69	-	-	8.49	-	-	310.77	-	-
Unit 4	-	-	-	-	1,279.73	-	-	39.69	-	-	8.37	-	-	314.90	-	-
Unit 5 Share	-	-	-	-	1,279.71	-	-	39.72	-	-	8.40	-	(10,821.20)	308.65	216.90	-
IMPA Credits	-	-	-	-	-	-	-	-	-	-	-	-	(5,405.20)	-	108.34	-
WVPA Credits	-	-	-	-	-	-	-	-	-	-	-	-	(5,416.00)	-	108.56	-
Unit 5 Whole	-	-	-	-	1,279.71	-	-	39.72	-	-	8.40	-	-	308.65	(0.00)	-
Wabash River Station Total	-	-	-	-	-	-	1,805.21	919.51	-	111.81	22,916.88	8.59	-	323.80	-	-
Unit 2	-	-	-	-	-	-	229.64	433.53	-	14.12	2,215.45	0.84	-	42.20	-	-
Unit 3	-	-	-	-	-	-	229.64	70.99	-	14.12	1,262.75	0.84	-	39.27	-	-
Unit 4	-	-	-	-	-	-	229.64	70.99	-	14.12	1,133.19	0.84	-	43.74	-	-
Unit 5	-	-	-	-	-	-	256.89	79.17	-	15.80	1,447.58	0.94	-	45.67	-	-
Unit 6	-	-	-	-	-	-	859.40	264.83	-	52.85	4,923.94	3.13	-	152.92	-	-
Unit 7	-	-	-	-	-	-	-	-	-	-	11,034.00	-	-	-	-	-
Cayuga CT Total	-	-	-	-	54,708.35	-	31,390.65	23,657.26	11,617.42	1,054.76	49,752.08	3,082.03	-	40.00	-	-
Connersville CT Total	-	-	-	-	57,722.18	-	49,909.91	27,289.55	11,889.55	-	43,921.15	-	-	34.50	-	-
Miami-Wabash CT Total	-	-	-	-	81,460.24	-	39,432.17	19,278.11	12,678.62	888.50	18,727.95	-	-	37.75	-	-
W.R. Repowering Total	-	-	-	-	271,070.57	45,405.47	1,528,327.69	288,430.24	90,102.29	80,233.80	1,054,637.04	123,455.48	-	92.50	-	-
Noblesville Total	-	-	-	-	-	-	-	240.44	5,863.57	-	28.71	-	-	42.91	-	-
Edwardsport Total	-	-	-	-	-	-	-	434.72	5,842.28	-	2.16	-	-	73.95	-	-
Other	-	-	-	-	-	-	-	90.00	-	-	1,892.67	-	191.62	8,066,565.24	-	23,877,711.83
GRAND TOTAL	18,532.92	11,371.40	441,840.94	64,890.08	451,357.97	45,405.47	1,667,837.93	359,841.47	138,510.73	82,088.07	1,221,885.86	127,285.01	(10,629.58)	5,993,842.10	216.90	23,877,711.83

Edwardsport 500 accounts

Noblesville 500 accounts this schedule

Noblesville 500 accounts original schedule

Adjustment

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	568 568	569 569	570 570	571 571	573 573	586 586	590 590	592 592	598 598	901 901	902 902	909 909	910 910	911 911	920 920
TOTAL ACTUALS															
Cayuga Station Total	-	-	13,877.98	-	-	-	-	-	14,613.89	-	-	-	-	928.20	119,224.64
Unit 1	-	-	6,735.84	-	-	-	-	-	7,406.87	-	-	-	-	464.13	50,604.66
Unit 2	-	-	7,142.14	-	-	-	-	-	7,209.02	-	-	-	-	464.07	50,405.87
Unit 3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	124.11
Gallagher/Markland Station Total	-	-	97,035.58	-	-	-	-	-	-	-	-	-	-	-	74,207.68
Unit 1	-	-	25,375.47	-	-	-	-	-	-	-	-	-	-	-	18,412.31
Unit 2	-	-	24,492.88	-	-	-	-	-	-	-	-	-	-	-	18,412.31
Unit 3	-	-	23,534.16	-	-	-	-	-	-	-	-	-	-	-	18,412.31
Unit 4	-	-	23,633.07	-	-	-	-	-	-	-	-	-	-	-	18,411.97
Markland 1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	186.26
Markland 2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	186.26
Markland 3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	186.26
Gibson Station Total	-	-	56,828.58	-	-	-	-	-	-	-	-	360.00	-	-	(1,232,717.93)
Unit 1	-	-	10,064.64	-	-	-	-	-	-	-	-	72.00	-	-	36,167.79
Unit 2	-	-	7,261.92	-	-	-	-	-	-	-	-	72.00	-	-	36,167.79
Unit 3	-	-	20,681.30	-	-	-	-	-	-	-	-	72.00	-	-	36,165.65
Unit 4	-	-	15,664.33	-	-	-	-	-	-	-	-	72.00	-	-	35,734.49
Unit 5 Share	-	-	3,756.19	-	-	-	-	-	-	-	-	72.00	-	-	(1,377,013.65)
IMPA Credits	-	-	(6,303.44)	-	-	-	-	-	-	-	-	-	-	-	(712,466.61)
WVPA Credits	-	-	(5,316.06)	-	-	-	-	-	-	-	-	-	-	-	(713,894.40)
Unit 5 Whole	-	-	16,375.69	-	-	-	-	-	-	-	-	72.00	-	-	49,347.36
Wabash River Station Total	-	-	31,963.74	-	-	-	35.47	568.49	-	-	-	-	-	-	80,819.12
Unit 2	-	-	6,745.61	-	-	-	4.50	-	-	-	-	-	-	-	10,296.12
Unit 3	-	-	7,430.68	-	-	-	4.50	-	-	-	-	-	-	-	10,296.12
Unit 4	-	-	4,939.40	-	-	-	4.50	568.49	-	-	-	-	-	-	10,296.12
Unit 5	-	-	3,301.72	-	-	-	5.07	-	-	-	-	-	-	-	11,491.00
Unit 6	-	-	9,546.33	-	-	-	16.90	-	-	-	-	-	-	-	38,433.67
Unit 7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cayuga CT Total	-	-	768.64	-	-	-	-	-	-	-	-	-	-	-	3,635.89
Connersville CT Total	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3,126.78
Miami-Wabash CT Total	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3,431.96
W.R. Repowering Total	-	-	(700.89)	-	-	-	-	-	-	-	-	-	-	-	8,386.64
Noblesville Total	-	-	382.58	5,728.00	-	-	-	-	-	-	-	-	-	-	5,198.00
Edwardsport Total	-	-	5,678.24	-	-	-	-	-	-	-	-	-	-	-	8,190.73
Other	7.92	20.47	71,420.41	3,014.50	95,278.40	2,033.76	5.28	229.19	(4,113.08)	136.24	-	-	-	-	9,051,714.16
GRAND TOTAL	7.92	20.47	277,234.26	8,742.50	95,278.40	2,033.76	40.75	797.68	10,502.80	136.24	-	360.00	-	928.20	9,126,189.69

Edwardsport 500 accounts

Noblesville 500 accounts this schedule

Noblesville 500 accounts original schedule

Adjustment

09603-016746

EMBU O&M for PSI - Actual
Twelve Months Ended 9/30/02
Rate Case Reference Code: EM1

TOTAL ACTUALS	921 921	922 922	923 923	924 924	925 925	926 926	928 928	929 929	930.1 930.1	930.2 930.2	931 931	935 935	Grand Total Grand Total
Cayuga Station Total	14,927.96	-	25,737.35	-	29,275.73	2,709,965.12	-	(100,302.44)	-	40,896.97	20,812.53	-	18,971,064.10
Unit 1	7,412.17	-	12,933.99	-	14,531.09	1,360,937.50	-	(50,151.25)	-	20,462.83	10,000.30	-	9,434,801.05
Unit 2	7,471.74	-	12,803.37	-	14,731.92	1,341,439.00	-	(50,151.19)	-	20,301.50	9,982.84	-	9,498,465.50
Unit 3	44.05	-	(0.01)	-	12.72	7,588.62	-	-	-	192.64	29.39	-	37,797.55
Gallagher/Markland Station Total	35,732.12	-	14,516.63	-	27,716.91	2,248,476.85	-	-	-	17,527.60	18,153.02	-	16,490,719.97
Unit 1	8,895.64	-	3,629.15	-	6,831.39	552,115.41	-	-	-	4,189.32	4,483.68	-	3,738,202.50
Unit 2	8,883.79	-	3,629.15	-	6,831.39	549,606.83	-	-	-	4,185.23	4,464.40	-	3,682,309.24
Unit 3	8,877.14	-	3,629.15	-	6,998.66	518,493.93	-	-	-	4,182.98	4,463.18	-	3,643,030.55
Unit 4	8,877.37	-	3,629.15	-	6,998.17	562,848.41	-	-	-	4,163.19	4,481.53	-	4,397,614.87
Markland 1	66.06	-	0.01	-	19.10	37,563.12	-	-	-	288.96	433.97	-	542,075.40
Markland 2	66.06	-	0.01	-	19.10	14,144.73	-	-	-	288.96	433.97	-	246,204.72
Markland 3	66.06	-	0.01	-	19.10	13,704.42	-	-	-	288.96	434.09	-	241,382.50
Gibson Station Total	(423,394.45)	44,744.94	(404,875.37)	-	(27,543.13)	7,111,749.27	-	11,759.90	14,603.82	(140,851.24)	(385,512.80)	(164,918.99)	61,935,549.30
Unit 1	24,133.61	-	16,301.76	-	12,826.90	1,406,655.61	-	-	2,920.78	21,029.24	6,770.57	-	11,953,600.40
Unit 2	24,092.24	-	16,301.76	-	12,826.90	1,324,688.87	-	-	2,920.78	21,014.94	6,756.81	-	10,269,960.56
Unit 3	24,113.64	-	16,301.20	-	12,826.91	1,735,870.69	-	-	2,920.78	21,021.98	6,753.96	-	17,631,800.43
Unit 4	24,102.76	-	16,098.56	-	12,771.83	1,993,586.30	-	-	2,920.78	20,822.95	6,767.73	-	16,889,358.82
Unit 5 Share	(519,836.90)	44,744.94	(489,878.65)	-	(78,795.67)	651,167.80	-	11,759.90	2,920.78	(224,740.35)	(422,561.67)	(164,918.90)	5,390,929.09
IMPA Credits	(271,665.92)	22,350.00	(242,781.72)	-	(45,747.92)	(707,334.54)	-	5,874.08	-	(122,685.14)	(214,449.18)	(82,377.00)	(6,353,421.16)
WVPA Credits	(272,211.18)	22,394.94	(243,268.09)	-	(45,639.58)	(708,752.04)	-	6,885.82	-	(122,930.76)	(214,879.37)	(82,541.99)	(6,340,931.71)
Unit 5 Whole	24,041.20	-	16,171.16	-	12,791.83	2,067,254.38	-	-	2,920.78	20,875.55	6,766.88	-	18,085,281.96
Wabash River Station Total	27,817.36	-	17,274.49	-	26,312.50	2,763,674.31	-	-	-	20,070.28	15,873.41	-	20,329,589.78
Unit 2	3,556.21	-	2,206.50	-	3,349.31	429,006.73	-	-	-	2,563.87	2,025.96	-	2,998,179.91
Unit 3	3,516.07	-	2,206.50	-	3,349.31	435,971.63	-	-	-	2,550.01	2,017.75	-	3,358,587.93
Unit 4	3,577.41	-	2,206.50	-	3,349.31	406,008.93	-	-	-	2,571.14	2,031.69	-	2,886,149.67
Unit 5	3,950.60	-	2,453.26	-	3,742.92	417,660.73	-	-	-	2,850.99	2,256.75	-	3,047,026.31
Unit 6	13,217.07	-	8,201.73	-	12,521.65	1,074,385.34	-	-	-	9,534.27	7,541.26	-	8,016,802.65
Unit 7	-	-	-	-	-	1,218.95	-	-	-	-	-	-	13,843.32
Cayuga CT Total	446.93	-	-	-	1,003.15	46,116.01	-	-	-	1,936.31	345.82	-	265,936.58
Connersville CT Total	379.95	-	-	-	661.86	42,228.68	-	-	-	1,661.61	446.06	-	254,482.78
Miami-Wabash CT Total	415.69	-	-	-	943.29	38,547.70	-	-	-	1,818.11	277.35	-	209,345.72
W.R. Repowering Total	1,260.17	-	-	-	3,149.02	476,804.74	-	-	-	4,476.27	5,778.06	-	4,208,733.44
Noblesville Total	40,101.61	-	2,322.83	-	12,638.06	577,258.48	-	-	-	2,674.24	4,374.14	-	3,172,264.14
Edwardsport Total	3,160.07	-	4,137.15	-	7,638.19	900,242.08	-	-	-	4,731.18	6,783.55	-	5,584,155.38
Other	3,325,969.96	(20,599.82)	5,912,146.61	643,750.02	7,179.52	7,137,526.03	787,475.00	-	-	1,608,852.48	708,485.41	14.97	60,450,858.21
GRAND TOTAL	3,026,840.61	24,145.12	5,371,259.49	643,750.02	89,376.10	24,052,386.59	787,475.00	(88,542.54)	14,603.82	1,563,398.02	388,218.79	(164,904.02)	192,493,726.00

Edwardsport 500 accounts

Noblesville 500 accounts this schedule

Noblesville 500 accounts original schedule

Adjustment

09603-016747

Attachment OUCC/PSI 6-182-C

Edwardsport O+N
Avoided w/ seasonal operations.

Amount				
Business Segment2	Accounting Period	Program	Total	
Edwardsport	200110		$4,125.96	
		ACELEQUP	$2,322.54	Accessory Electric Equipment
		AIRSYSTM	$20,360.45	Air systems
		ASHHANDL	$1,988.03	Ash handling
		ASHPNDLF	$14,262.30	Ash pond/landfill
		BLRDRAFT	$768.07	Boiler
		BLRWATER	$23,078.79	Boiler
		CIRCWATR	$911.14	Circulating Water
		COMBCYCL	$2,210.47	Combined Cycle & CT
		CONDEQUP	$352.37	Condensing Equipment
		ECBUGENL	$17.07	ECBU - General
		ECBUPWOP	$7,728.45	ECBU - Power Operations
		ELPLTOPN	$26,827.88	Electric Plant Operations
		ENVRNMNT	$6,734.21	Environmental
		FUELHNEQ	$21,359.97	Fuel Handling Equipment
		FUELMGMT	$3,293.09	Fuel Management
		FURNBOIL	$13,959.10	Furnace/Boiler
		NONREGUL	-$203.72	
		PLVZEQUP	$7,284.92	Puleverizer
		RESIDDSP	-$3,182.38	Residual Disposal
		STATSPRT	$27,869.01	Station support
		STBLDGRN	$18,105.07	Buildings, structures, grounds.
		STMPLNTO	$76,856.99	Steam plant operations
		STSPRTOP	$111.02	Station support
		TRBNGENR	$1,750.25	Turbine/Generator
	200110 Total		$278,891.05	70,194.35
	200111		$1,407.01	
		ACELEQUP	$405.30	Accessory Electric Equipment
		AIRSYSTM	$7,854.44	Air systems
		ASHHANDL	$5,387.16	Ash handling
		ASHPNDLF	$8,840.06	Ash pond/landfill
		BLRDRAFT	-$6,573.08	Boiler
		BLRWATER	$8,725.20	Boiler
		CIRCWATR	$641.78	Circulating Water
		COMBCYCL	$1,011.78	Combined Cycle & CT
		ECBUGENL	$13.72	ECBU - General
		ECBUPWOP	$7,270.49	ECBU - Power Operations
		ELPLTOPN	$28,797.35	Electric Plant Operations
		ENVRNMNT	$11,595.86	Environmental
		FUELHNEQ	$20,243.81	Fuel Handling Equipment
		FUELMGMT	$2,077.41	Fuel Management
		FURNBOIL	$12,274.55	Furnace/Boiler
		NONREGUL	-$14.40	
		PLVZEQUP	$5,726.59	Puleverizer
		RESIDDSP	$916.34	Residual Disposal
		STATSPRT	$74,927.22	Station support
		STBLDGRN	$8,234.13	Buildings, structures, grounds.
		STMPLNTO	$93,767.31	Steam plant operations
		STSPRTOP	$178.07	Station support
		SWTCHYRD	$328.35	Switchyard
		TRBGNROP	$2.16	Turbine/Generator
		TRBNGENR	$3,330.73	Turbine/Generator
	200111 Total		$297,369.34	$107,044.04

Pro Firma $
No Explanations
FU DRs
Submitted

09603-016733

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Attachment OUCC/PSI 6-182-C

200112		$109.89		
	ACELEQUP	$238.13	Accessory Electric Equipment	
	AIRSYSTM	$5,006.84	Air systems	
	ASHHANDL	$4,319.05	Ash handling	
	ASHPNDLF	$134,315.16	Ash pond/landfill	
	BLRDRAFT	$126.05	Boiler	
	BLRWATER	$41,631.67	Boiler	
	CIRCWATR	$18,463.88	Circulating Water	
	COMBCYCL	$679.18	Combined Cycle & CT	
	CONDEQUP	$479.18	Condensing Equipment	
	ECBUGENL	$36.92	ECBU - General	
	ECBUMRTR	$65.00	ECBU - Marketing/Trading	
	ECBUPWOP	$5,788.78	ECBU - Power Operations	
	ELPLTOPN	$21,338.77	Electric Plant Operations	
	ENVRNMNT	$7,249.71	Environmental	
	FUELHNEQ	$19,567.83	Fuel Handling Equipment	
	FUELMGMT	$2,438.00	Fuel Management	
	FURNBOIL	$16,716.40	Furnace/Boiler	
	NONREGUL	-$17.30		
	PLVZEQUP	$6,917.62	Puleverizer	
	RESIDDSP	$777.59	Residual Disposal	
	STATSPRT	$63,630.94	Station support	
	STBLDGRN	$18,097.68	Buildings, structures, grounds.	
	STMPLNTO	$71,188.42	Steam plant operations	
	STSPRTOP	$87.23	Station support	
	SWTCHYRD	$149.91	Switchyard	
	TRBNGENR	$519.92	Turbine/Generator	
200112 Total		$439,922.45		98,333.24
200201	ACELEQUP	$173.62	Accessory Electric Equipment	
	AIRSYSTM	$11,374.93	Air systems	
	ASHHANDL	$1,211.83	Ash handling	
	ASHPNDLF	$1,818.32	Ash pond/landfill	
	BLRDRAFT	$2,205.32	Boiler	
	BLRWATER	$25,592.01	Boiler	
	CIRCWATR	$5,745.39	Circulating Water	
	COMBCYCL	$1,234.82	Combined Cycle & CT	
	CONDEQUP	$532.72	Condensing Equipment	
	ECBUGENL	$11.60	ECBU - General	
	ECBUPWOP	$27,739.44	ECBU - Power Operations	
	ELPLTOPN	$26,158.36	Electric Plant Operations	
	ENVRNMNT	$28,705.59	Environmental	
	FUELHNEQ	$13,904.15	Fuel Handling Equipment	
	FUELMGMT	$2,032.54	Fuel Management	
	FURNBOIL	$15,040.69	Furnace/Boiler	
	PLVZEQUP	$21,992.87	Puleverizer	
	RESIDDSP	$4,104.03	Residual Disposal	
	STATSPRT	$84,064.03	Station support	
	STBLDGRN	$13,445.41	Buildings, structures, grounds.	
	STMPLNTO	$86,076.77	Steam plant operations	
	STSPRTOP	$174.16	Station support	
	TRBNGENR	$5,539.21	Turbine/Generator	
200201 Total		$378,877.81		157,407.6
200202		$1,851.96		
	ACELEQUP	$1,706.57	Accessory Electric Equipment	
	AIRSYSTM	$4,446.96	Air systems	
	ASHHANDL	$7,230.47	Ash handling	
	ASHPNDLF	$2,714.48	Ash pond/landfill	

Attachment OUCC/PSI 6-182-C

	BLRDRAFT	$3,120.21	Boiler	
	BLRWATER	$24,639.89	Boiler	
	CIRCWATR	$6,685.67	Circulating Water	
	COMBCYCL	$726.03	Combined Cycle & CT	
	CONDEQUP	$2,331.69	Condensing Equipment	
	ECBUPWOP	$20,430.40	ECBU - Power Operations	
	ELPLTOPN	$21,230.36	Electric Plant Operations	
	ENVRNMNT	$177,790.83	Environmental	
	FUELHNEQ	-$18,731.77	Fuel Handling Equipment	
	FUELMGMT	$1,573.00	Fuel Management	
	FURNBOIL	$12,476.19	Furnace/Boiler	
	PLVZEQUP	$5,685.94	Puleverizer	
	RESIDDSP	$614.92	Residual Disposal	
	STATSPRT	$83,606.18	Station support	
	STBLDGRN	$17,497.27	Buildings, structures, grounds.	
	STMPLNTO	$66,938.14	Steam plant operations	
	STSPRTOP	$84.24	Station support	
	SWTCHYRD	$144.68	Switchyard	
	TRBNGENR	$1,505.33	Turbine/Generator	
200202 Total		$446,299.64		303,704.59
200203		$5,324.38		
	ACELEQUP	$1,089.30		
	AIRSYSTM	$6,042.56		
	ASHHANDL	$3,326.87		
	ASHPNDLF	$462.95		
	BLRDRAFT	$7,484.59		
	BLRWATER	$14,932.52		
	CIRCWATR	-$1,638.42		
	CONDEQUP	$48.06		
	ECBUMRTR	$34.33		
	ECBUPWOP	$28,193.36		
	ELPLTOPN	$28,625.38		
	ENVRNMNT	$5,370.79		
	FUELHNEQ	$31,626.74		
	FUELMGMT	$1,628.43		
	FURNBOIL	$15,657.89		
	PLVZEQUP	$1,438.63		
	RESIDDSP	$946.44		
	STATSPRT	$101,291.54		
	STBLDGRN	$11,728.26		
	STMPLNTO	$89,561.92		
	SWTCHYRD	$407.81		
	TRBNGENR	$6,572.96		
200203 Total		$360,157.29		
200204		$2,314.95		
	ACELEQUP	$745.96		
	AIRSYSTM	$8,905.59		
	ASHHANDL	$3,857.62		
	ASHPNDLF	$8,429.82		
	BLRDRAFT	$3,985.55		
	BLRWATER	$14,701.25		
	CIRCWATR	$442.19		
	CONDEQUP	$460.64		
	ECBUMRTR	-$25.38		
	ECBUPWOP	$26,663.76		
	ELPLTOPN	$25,183.66		
	ENVRNMNT	$3,790.28		

Attachment OUCC/PSI 6-182-C

	FUELHNEQ	$15,887.71
	FUELMGMT	$1,662.73
	FURNBOIL	$22,260.71
	PLVZEQUP	$3,521.05
	RESIDDSP	$120.26
	STATSPRT	$110,147.13
	STBLDGRN	$10,158.85
	STMPLNTO	$77,021.32
	SWTCHYRD	$247.67
	TRBNGENR	$6,557.48
200204 Total		$347,040.80
200205	ACELEQUP	$2,823.81
	AIRSYSTM	$9,469.42
	ASHHANDL	$9,449.02
	ASHPNDLF	$523.06
	BLRDRAFT	$6,195.19
	BLRWATER	$21,173.99
	CIRCWATR	$2,442.93
	ECBUPWOP	$27,576.54
	ELPLTOPN	$29,013.51
	ENVRNMNT	$6,574.81
	FUELHNEQ	$15,517.28
	FUELMGMT	$2,236.89
	FURNBOIL	$33,601.68
	PLVZEQUP	$4,982.13
	RESIDDSP	$787.15
	STATSPRT	$105,521.33
	STBLDGRN	$18,341.12
	STMPLNTO	$86,922.18
	SWTCHYRD	$1,475.77
	TRBNGENR	$4,033.55
200205 Total		$388,661.36
200206	ACELEQUP	$1,883.64
	AIRSYSTM	$4,513.07
	ASHHANDL	$5,426.75
	ASHPNDLF	$355.53
	BLRDRAFT	$707.44
	BLRWATER	$43,202.26
	CIRCWATR	$9,024.48
	CONDEQUP	$373.93
	ECBUPWOP	$23,679.86
	ELPLTOPN	$19,559.90
	ENVRNMNT	-$17,054.34
	FUELHNEQ	$24,075.34
	FUELMGMT	$3,827.30
	FURNBOIL	$22,545.82
	PLVZEQUP	$5,904.57
	RESIDDSP	$129.54
	STATSPRT	$163,172.03
	STBLDGRN	$24,274.05
	STMPLNTO	$67,771.85
	SWTCHYRD	$1,809.54
	TRBNGENR	$8,196.91
200206 Total		$413,379.47
200207	ACELEQUP	$668.89
	AIRSYSTM	$22,861.25
	ASHHANDL	$14,026.26

Attachment OUCC/PSI 6-182-C

	ASHPNDLF	$1,089.10
	BLRDRAFT	$8,172.90
	BLRWATER	$12,690.40
	CIRCWATR	$613.90
	CONDEQUP	$1,214.88
	ECBUPWOP	$19,356.75
	ELPLTOPN	$38,532.19
	ENVRNMNT	$22,414.63
	FUELHNEQ	$28,846.16
	FUELMGMT	$2,362.89
	FURNBOIL	$13,161.17
	PLVZEQUP	$3,487.30
	RESIDDSP	$634.28
	STATSPRT	$216,149.89
	STBLDGRN	$16,631.66
	STMPLNTO	$119,274.79
	SWTCHYRD	$308.61
	TRBNGENR	$4,921.91
200207 Total		$547,419.81
200208	ACELEQUP	$3,710.91
	AIRSYSTM	-$299.10
	ASHHANDL	$59,072.38
	ASHPNDLF	$881.40
	BLRDRAFT	$1,008.83
	BLRWATER	$25,239.84
	CIRCWATR	$542.72
	CONDEQUP	$5,304.83
	ECBUPWOP	$20,721.94
	ELPLTOPN	$42,165.92
	ENVRNMNT	$5,734.34
	FUELHNEQ	$32,494.58
	FUELMGMT	$2,736.82
	FURNBOIL	$26,403.50
	PLVZEQUP	$13,217.89
	RESIDDSP	$1,094.68
	STATSPRT	$35,076.77
	STBLDGRN	$21,622.27
	STMPLNTO	$115,555.07
	SWTCHYRD	$651.10
	TRBNGENR	$4,619.12
200208 Total		$417,555.81
200209	ACELEQUP	$2,229.58
	AIRSYSTM	$3,916.63
	ASHHANDL	$7,612.24
	ASHPNDLF	$920.06
	BLRDRAFT	$1,366.99
	BLRWATER	$23,501.77
	CIRCWATR	$475.92
	CONDEQUP	$150.92
	ECBUPWOP	$20,329.30
	ELPLTOPN	$19,478.79
	ENVRNMNT	$3,215.14
	FUELHNEQ	$19,152.04
	FUELMGMT	$2,239.68
	FURNBOIL	$38,445.38
	PLVZEQUP	$9,160.86
	RESIDDSP	$2,521.82

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Attachment OUCC/PSI 6-182-C

		STATSPRT	$79,327.46	
		STBLDGRN	$10,711.61	
		STMPLNTO	$83,836.18	
		SWTCHYRD	$154.80	
		TRBNGENR	$3,710.41	
	200209 Total		$332,457.58	
Edwardsport Total			$4,648,032.41	3,543,355.93
	Adjustment			-1,104,676.48

(-1,105) 5

AZ Public Service Co
2003 Rate Case

PWEC O&M (INCLUDING A&G)

DGR_WP 14 11/21

1	Total PWEC O&M	Operations (excl. Aux Power)	13,278		3.A
2	(Plants Only)	Auxiliary Power	3,393		
3		Maintenance	7,243		4.A
4		Overhaul (12 year average)	11,238		4.B
5		A&G	1,100		6.A
6		Total	36,252		
7		Add: Corp / Gov Alloc (A&G)	5,504		6.B
8		Add: SS Org Ops	354	26.9%	3.B
9		Add: SS Org A&G	934	70.9%	6.C
10		Add: SS Org Maintenance	29	2.2%	4.C
11		Total	1,317		

Following are $ now charged by SS to Const - will go to O&M in future

12	Total SS to Const	1,776		
13	Ops	478	26.9%	3.C
14	A&G	1,259	70.9%	6.D
15	Maint	39	2.2%	4.D
16		3.C.1 1,776		
17	Total PWEC = 6+7+11+16	44,849		
18	Less: Aux Pwr line 2	(3,393)		
19	Net PWEC for Pro-Forma	41,455		
20	Total Operations = 1+8+13	14,110		3.
21	Total Maintenance = 3+4+10+15	18,549		4.
22	Total A&G = 5+7+9+14	8,797		6.
23	Total	41,455		

DGR_WP 14 12/21

PWEC UNITS O&M
$(000)

		2003
Redhawk:		
Unit 1	Operations (excl. Aux Power)	4,501
	Auxiliary Power	532
	Maintenance	2,107
	Overhaul (12 year average)	3,493
	A&G	297
	Total	10,929
Unit 2	Operations (excl. Aux Power)	4,474
	Auxiliary Power	532
	Maintenance	2,119
	Overhaul (12 year average)	3,493
	A&G	297
	Total	10,915
Total Redhawk	Operations (excl. Aux Power)	8,975
	Auxiliary Power	1,063
	Maintenance	4,227
	Overhaul (12 year average)	6,986
	A&G	594
	Total	21,845
Saguaro CT#3	Operations (excl. Aux Power)	162
	Auxiliary Power	441
	Maintenance	144
	Overhaul (12 year average)	420
	A&G	26
	Total	1,193
WPhx CC4	Operations (excl. Aux Power)	851
	Auxiliary Power	647
	Maintenance	782
	Overhaul (12 year average)	395
	A&G	119
	Total	2,793
WPhx CC5	Operations (excl. Aux Power)	3,290
	Auxiliary Power	1,242
	Maintenance	2,089
	Overhaul (12 year average)	3,437
	A&G	361
	Total	10,421
Total WPhx CC	Operations (excl. Aux Power)	4,141
	Auxiliary Power	1,890
	Maintenance	2,871
	Overhaul (12 year average)	3,832
	A&G	480
	Total	13,214
Total PWEC O&M (Plants Only)	Operations (excl. Aux Power)	13,278 3.A
	Auxiliary Power	3,393
	Maintenance	7,243 4.A
	Overhaul (12 year average)	11,238 4.B
	A&G	1,100 6.A
	Total	36,252

Actuals w/ [illegible] OH [illegible]

Intended to span minor + major inspection cycles beyond [illegible] periods.

DGR_WP14 13/21

2002 Corporate and Governance
Allocation to PWEC $5,504,150.79

6.B

Details in confd WP volume

DGR-WP14 14/21

accounting system on a project-by-project basis. This adjustment properly increases accumulated depreciation to reflect the depreciation expense that should been accrued on the projects that were in service prior to June 30, 2003.

B. Working Capital

Q. PLEASE DESCRIBE THE ADJUSTMENT MADE TO WORKING CAPITAL.

A. The working capital adjustment shown on Schedule B-2 is to the prepayment component of working capital, which includes such items as prepaid insurance, prepaid taxes, prepaid pension expense and other miscellaneous prepayments and is based on a thirteen-month average balance consistent with past Commission practices. The prepaid pension amount reflects the excess funding position that the Company was in during the June 2002 through November 2002 time period. In December 2002, the Company recorded a minimum pension liability that reduced the prepayment related to the pension expense to zero. This adjustment reduces the thirteen-month average balance by $16,127,378 to properly adjust the remaining prepaid items to the correct level. A more detailed discussion of the minimum pension liability entry is included in Section V of my testimony.

Q. PLEASE DESCRIBE THE CASH WORKING CAPITAL (CWC) COMPONENT OF THE COMPANY'S RATE BASE.

A. CWC is an estimate of the funds supplied by investors to cover the operating costs of the Company during the period before revenues are collected from customers. The allowance recognizes that investors are entitled to earn a return on the funds they supplied to finance the day-to-day operations of the business.

1 A. Adjustments were made to reflect changes to the outstanding long-term debt balance
2 and a change to common equity.
3 Q. PLEASE DESCRIBE THE ADJUSTMENT MADE TO THE OUTSTANDING
4 LONG-TERM DEBT BALANCE.
5 A. Long-term debt was increased by $45,837,000 to reflect the issuance of Series 2003,
6 4.85% first mortgage bonds in September 2003 net of the redemption of Series V,
7 7.375% first mortgage bonds redeemed in October 2003. The result of this pro-forma
8 adjustment is a reduction in the cost of long-term debt to 7.05%. Ignoring this
9 adjustment would raise the cost of long-term debt to 7.58%.
10 Q. PLEASE DESCRIBE THE ADJUSTMENT MADE TO COMMON STOCK
11 EQUITY.
12 A. PSO's common stock equity was increased by $55,410,360 to remove a charge
13 recorded in December 2002. The charge to common equity in December 2002
14 represents the excess of the present value of PSO's accumulated pension benefit
15 obligation over the market value of its pension plan trust assets. Generally Accepted
16 Accounting Principles (GAAP) require that PSO recognize this liability, known as its
17 minimum pension liability, only on its balance sheet, resulting in the charge directly
18 to common stock equity instead of pension expense. This adjustment is called an
19 "Other Comprehensive Income (OCI) " adjustment.
20 Q. WHY IS THE OCI ADJUSTMENT TO COMMON EQUITY APPROPRIATE?
21 A. The OCI adjustment restores the balance to this account to the level prior to the entry
22 recorded in December 2002 for the minimum pension liability. The minimum

1 pension liability charge has not been included in PSO's pension expense under GAAP
2 and has not been included in cost of service. To retain the full minimum pension
3 liability charge as a reduction to common equity is to recognize possible future
4 pension expense increases that have not been recorded under GAAP as pension
5 expense. Common equity for ratemaking should not be reduced by contingent costs
6 that have not yet been recorded as an expense under GAAP and have not been
7 included in cost of service.

8 Q. WHY DID THE COMPANY RECORD A MINIMUM PENSION LIABILITY IN
9 DECEMBER 2002?

10 A. A combination of economic and market circumstances, which had never occurred in
11 the past, and pertinent accounting rules required PSO to record for the first time a
12 minimum pension liability in December 2002. Until recently PSO's pension fund,
13 like those of other companies, had pension trust fund assets in excess of its
14 accumulated pension benefit obligation. However, significant stock market declines
15 in recent years reduced the market value of PSO's pension plan trust assets, just as
16 they have for the pension plans of other companies. Contemporaneously, significant
17 reductions in interest rates have reduced the discount rate employed to determine the
18 present value of PSO's pension liability known as its accumulated pension benefit
19 obligation. This reduction in the discount rate increased PSO's and other companies
20 accumulated pension benefit obligation. Therefore, pension assets declined at the
21 same time as the present value of the pension obligation was increasing. These two
22 factors caused PSO's pension plan to move from a surplus to a deficit position.

1 GAAP required PSO to record a minimum pension liability directly to common stock
2 equity to reflect the net contingent liability on its balance sheet.
3 Q. WHY IS THE MINIMUM PENSION LIABILITY RECORDED DIRECTLY TO
4 PSO'S COMMON STOCK EQUITY AND NOT RECORDED AS A CHARGE TO
5 PENSION EXPENSE?
6 A. GAAP does not require the minimum pension liability to be recorded as an operating
7 expense because the liability is subject to change in the future as the market value of
8 the pension trust investments fluctuates and as interest rates change impacting the
9 discount rate and the estimated pension obligation. To reflect the full impact of stock
10 market and interest rate fluctuations on pension expense annually would subject
11 pension expense to considerable market volatility when equity market values and
12 interest rates rise and fall, which would distort the perceived financial condition of the
13 Company. To avoid such significant volatility in annual pension expense, GAAP
14 does not require a minimum pension liability to be recorded as a current expense.
15 Rather it provides for a smoothing of pension expense by recording market losses or
16 gains as a charge or credit to pension expense over time. This smoothing effect is
17 entirely consistent with the general rate setting principles that set rates on a
18 normalized test year basis, adjusting out extraordinary items that have occurred during
19 the test year.
20 Q. WHAT SPECIFIC GAAP REQUIRES THE RECORDING OF A MINIMUM
21 PENSION LIABILITY DIRECTLY TO EQUITY?

1 A. Financial Accounting Standards Board's (FASB's) Statement of Financial
2 Accounting Standards (SFAS) No. 87, *Employers' Accounting for Pensions (SFAS*
3 *87)*, addresses the accounting for pension costs, while Statement of Financial
4 Accounting Standards No. 130, *Reporting Comprehensive Income (SFAS 130)*, covers
5 other comprehensive income adjustments, i.e. adjustments directly to equity. These
6 are the specific accounting pronouncements that required PSO to record a minimum
7 pension liability directly to equity in December 2002.

8 Q. PLEASE DESCRIBE SFAS 87 ACCOUNTING REQUIREMENTS FOR PENSION
9 COSTS.

10 A. SFAS 87 requires that employers such as PSO spread the cost of pension benefits
11 over the working lives of employees. So that employers will have accrued the present
12 value of the entire benefit obligation by the employee's retirement date, employers are
13 required to accrue a liability for the present value of their future pension benefits
14 during employees' years of service. The FASB based this accounting on its
15 determination that pension benefits are a form of deferred compensation, which
16 should be recorded on an accrual basis as the benefits are earned over the benefiting
17 employees working lives.

18 Q. DOES SFAS 87 REQUIRE THAT THE MINIMUM PENSION LIABILITY BE
19 INCLUDED IN PERIODIC PENSION COST?

20 A. No. When it applies, the minimum pension liability is recorded only on the balance
21 sheet by a charge to common stock equity since it represents the unamortized amount
22 of an unrealized estimated loss that is subject to change as equity market values and

1 interest rates change. Amortization of the loss is spread to pension expense on the
2 income statement under the smoothing provisions of SFAS 87.
3 The minimum pension liability applies if pension assets are less than the
4 accumulated benefit obligation (the present value of benefits earned to-date by
5 employees and retirees). The FASB recognized that the minimum pension liability
6 should not affect expenses currently, since it is contingent and SFAS 87 already
7 provides for the proper measure of periodic pension expense. Accordingly, the
8 minimum pension liability recorded on the balance sheet is offset by another balance
9 sheet entry to equity. FASB issued SFAS 130 to govern the accounting for the OCI
10 component of shareholders' equity, which provides for the offsetting balance sheet
11 accounting for a minimum pension liability.
12 Q. WHAT DOES SFAS 130 REQUIRE WITH REGARD TO MINIMUM PENSION
13 LIABILITIES?
14 A. SFAS 130 defines Other Comprehensive Income to include, in addition to net income,
15 other changes in a company's equity from transactions and other events and
16 circumstances from non-owner sources. The stated purpose is to report a measure of
17 all changes in equity not just those included in the income statement that result from
18 transactions and economic events. SFAS 130's list of OCI items includes foreign
19 currency translation changes, minimum pension liability, and unrealized holding gains
20 and losses on available-for-sale securities. In each case, the liability is fully
21 recognized on the balance sheet but not the income statement, because the appropriate
22 period cost has been included in the income statement under GAAP.

was applied to the customer deposits at the end of the test year resulting in the increase to cost of service of $925,463. The total amount of customer deposits is reflected as a reduction to rate base on Schedule B-2.

Q. WHAT IS THE PURPOSE OF ADJUSTMENT WP H-2-2 AS SHOWN ON PAGE 1 OF SCHEDULE H-2?

A. This adjustment increases operation expense by $4,302,271 to reflect an increase in the level of pension expense to be recorded by the Company through December 2007. The adjustment is known and measurable based on a study conducted by PSO's independent actuary, Towers Perrin, as discussed in the testimony of Witness Michael J. Turk. The adjustment is necessary to be in compliance with SFAS 87 as discussed previously.

In developing this adjustment, the 2004 through 2007 pension expense levels projected by Towers Perrin were averaged. Averaging the projected pension expense for the four-year time period is consistent with the time period the rates determined in this proceeding are expected to be in effect. The average was then allocated to expense based on the ratio that operations and maintenance payroll bore to total payroll expense for the year. This portion of pension expense was then compared to the test year amount resulting in the increase of $4,302,271. Failure to make this adjustment to increase cost of service to reflect the GAAP required level of pension expense would result in PSO under earning the return on equity ultimately allowed by the Commission in this filing.

Q. PLEASE EXPLAIN ADJUSTMENT WP H-2-29 ON PAGE 6 OF SCHEDULE H-2. Brosh

A. This adjustment increases deferred fuel expense by $9,339,208. The adjustment is necessary in order to synchronize the test year adjusted Oklahoma jurisdictional fuel revenues with the test year adjusted Oklahoma jurisdictional recoverable fuel expense. It is also necessary to ensure that fuel revenues and fuel expenses have no impact on the base revenue deficiency. Without the fuel revenue and fuel expense synchronizing adjustments, recoverable fuel items would be improperly included in base rates.

Q. PLEASE EXPLAIN ADJUSTMENT WP H-2-30 ON PAGE 6 OF SCHEDULE H-2. Brosh

A. This adjustment decreases operations expense by $2,438,634. It reflects the removal of one-time costs incurred by the Company in performing Associated Business Development (ABD) activities for third parties. Likewise, the revenues associated with these activities were also removed by adjustment WP H-2-12. These costs and revenues are not representative of on-going operations at the Company. The remaining ABD revenues and expense included in the cost of service reflect a net profit of approximately $287,000, which reduces the revenue requirement of the Company.

Q. WHAT IS THE PURPOSE OF ADJUSTMENT WP H-2-31 ON PAGE 6 OF SCHEDULE H-2?

A. This adjustment increases operation and maintenance expenses by $359,002 to reflect increased levels of SFAS 87 pension expense and SFAS 106 post-retirement expense to be billed to PSO by AEPSC. The increase is calculated from the labor fringe

1 benefit billings from AEPSC and incorporates an average of the 2004 through 2007
2 SFAS 87 and SFAS 106 expense levels for AEPSC as projected by Towers Perrin.
3 The total test year labor fringe benefit billings from AEPSC were increased to reflect
4 the average level of these two expense items to determine the percentage increase.
5 This percentage increase was applied to the test year AEPSC labor fringe billings
6 charged to PSO to arrive at the increase of $359,002.
7 Q. WHAT IS THE PURPOSE OF THE INCOME TAX ADJUSTMENT ON PAGE 7
8 OF SCHEDULE H-2?
9 A. This adjustment provides for the change to federal and state income taxes as a result
10 of all of the changes made by the Company to operating revenues and expenses.
11 Application Package Schedule J-1 provides the calculation for both the test year and
12 the pro-forma test year. The Tax Department of AEPSC reviewed the changes to
13 revenues and expenses made by the Company in this filing and reflected the
14 appropriate adjustments in the income tax calculation. If these adjustments are not
15 made, the Company's operating expenses will be understated and the resulting net
16 operating income overstated.
17
18 VII. CONCLUSION
19 Q. PLEASE SUMMARIZE YOUR TESTIMONY.
20 A. My testimony and exhibits describe the Application Package schedules and the
21 information they contain. The adjustments proposed by the Company reflect
22 necessary and ordinary costs of operating an electric utility company that are fixed in

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1 has a limited duration. It is combined with other one-time items discussed in Section VI. E. of
2 my testimony.
3
4 C. PENSION ADJUSTMENT
5 **Q. PLEASE DESCRIBE YOUR ADJUSTMENTS RELATED TO PENSIONS.**
6 A. My first adjustment relates to pension credits that were booked in the third quarter of 1998 and
7 the amount expected to be recorded in the fourth quarter of 1998. These credits are a true up
8 to pension expense for the calendar year 1998. These additional credits have the effect of
9 reducing pension expense by an additional $7.4M.
10
11 **Q. THIS ADJUSTMENT, THEN, LOWERS THE REQUESTED REVENUE REQUIREMENT IN**
12 **THIS CASE.**
13 A. That is correct. However, this credit is a non-cash item.
14
15 **Q. WHAT EFFECT DOES THE CASH OR NON-CASH BASIS OF THIS EXPENSE HAVE?**
16 A. If the pension asset is treated correctly, then the non-cash nature of this adjustment is not an
17 issue.
18
19 **Q. PLEASE EXPLAIN.**
20 A. The customer will benefit from the pension credit in the form of reduced revenue requirements,
21 similar to the past when they benefited from pension credits the Company recorded in the late
22 80's and early 90's. Pension credits, which are a non-cash item, reduce the revenue
23 requirement. However, this reduction is a cash item. By this I mean that the revenues
24 collected from customers are lower because of the inclusion of the pension credit in the
25 development of the revenue requirement. Since the earnings of the pension plan cannot be
26 withdrawn, the Company's investors have to contribute the cash required to fund this
27 reduction in revenue requirements generated by the pension credits. The equitable balance

between the Company's customers and its investors is to flow through the pension credits to the customers and to allow the accumulated pension asset resulting from the pension credits to earn a return as part of the rate base. This reimburses the investors. This is my second pension related adjustment. It is shown at Exhibit GAR-8D.

D. ACCOUNTING ADJUSTMENTS

Q. EARLIER YOU MENTIONED THAT THERE WERE SOME ACCOUNTING ADJUSTMENTS THAT YOU WANTED TO EXPLAIN IN DETAIL.

A. Yes, they both relate to income taxes. Income taxes are the one portion of the end of period adjustment that are not brought to an end of period level directly. Income taxes on the difference between the actual net operating revenues recorded for the test year and the end of period net operating revenues are calculated. For this reason, the accounting adjustments that relate to income taxes are directly included in the calculation of the revenue requirement.

During the test year there were two such adjustments. One was the annual true-up of the prior year's income taxes in November of 1997. The other was the tax effect of the split costs that was inadvertently included in operating income taxes in June of 1998.

E. ADJUSTMENTS FOR ONE-TIME ITEMS

Q. ARE THERE ANY OTHER ADJUSTMENTS YOU WISH TO DISCUSS?

A. Yes, there are. There are three adjustments that I have made that involve a three year amortization of the costs to allow them to fit into the ratemaking model. Since these adjustments involve one-time issues, the most appropriate way to reflect them is a three year revenue requirement that will automatically cease after an amortization period. This three year revenue requirement is added to the basic revenue requirement to produce the total revenue requirement (see Exhibit GAR-1). All of these one-time adjustments are summarized at Exhibit GAR-9

U S WEST
Arizona Intrastate Operations
Proforma Adjustment
Pension Asset
Test Year Ending June 30, 1998
$(000)

Operating Revenues	0
Operating Expenses	(7,374)
Total Operating Income Taxes	2,936
Net Operating Income	4,438
Rate Base	64,057
Revenue Requirement	4,106

This adjustment reflects the incremental difference between the normal pension expense credit and the 3rd quarter 1998 and estimated 4th quarter 1998 credit per SFAS 87. It also reflects the incremental difference in the pension asset because of the expense credit booked. The adjustment also reflects the reduction to the pension asset and pension liability for a transfer from the pension fund to retiree healthcare claims in accordance with IRC Section 420.

1 **PENSION ASSET**

2 **Q. DO YOU AGREE WITH RUCO'S AND STAFF'S PROPOSAL TO**
3 **REMOVE PENSION ASSET FROM RATE BASE? [LARKIN, P. 29, LINE**
4 **8 TO P. 33. LINE 9; CARVER, PP. 116-134]**

5 A. No.

6

7 **Q. PLEASE EXPLAIN WHAT THE PENSION FUND IS.**

8 A. The pension fund is a trust (Pension Trust) that is a separate legal entity
9 from Qwest and, by law, is operated solely for the benefit of participating
10 employees and retirees. This is a very important point that bears
11 repeating. The Pension Trust and Qwest are completely separate legal
12 entities.

13

14 **Q. IS THERE A SURPLUS IN THE PENSION FUND?**

15 A. Yes. At the end of 1999, the pension plan's total benefit obligation was
16 computed under the rules of Statement of Financial Accounting Standards
17 No. 87 (FAS 87) to be $8.9 billion and the fair value of plan assets was
18 computed to be $14.6 billion. So the surplus was roughly $5.8 billion.

19

20 **Q. WHY IS THERE A SURPLUS IN THE PENSION FUND?**

1 A. Prior to Qwest's adoption of FAS 87 in 1987, the amount of pension
2 expense reported for financial reporting purposes in any given year
3 equaled the amount contributed to the pension fund for that year. The
4 amount contributed was (and remains) subject to limitations under ERISA
5 and federal income tax laws. After the adoption FAS 87, the recognition
6 of pension expense was de-coupled from the amount of funding; pension
7 expense became a computed amount.

8 Similarly, the FAS 87 rules for determining the amount of any surplus or
9 deficit in a pension fund are not tied to the laws governing pension plan
10 funding. So, right out of the box in 1987 the amount of surplus in the
11 pension fund recognized under FAS 87 rules was roughly $1.9 billion,
12 even though Qwest and its predecessors had never over-funded the plan
13 under ERISA and tax laws.

14 While the plan has continued to pay pension benefits, there has been no
15 funding of the Pension Trust since 1987. Nevertheless, the fair value of
16 plan assets in the Pension Trust has grown from $6.6 billion at year-end
17 1987 to $14.6 billion at year-end 1999 and the computed surplus under
18 FAS 87 has grown to $5.8 billion.

19 So the surplus arose when new measurement rules (FAS 87) were
20 adopted and has grown since then as a result of higher than actuarially
21 expected ("stellar" in Mr. Carver's parlance) returns on Pension Trust

1 investments. [Carver, p. 122, line 14; see also Attachment 1 to Mr.
2 Larkin's testimony]
3
4 **Q. IS ANY OF THIS MONEY RECORDED ON QWEST'S BOOKS?**
5 A. No. The plan assets (including the surplus) belong to the Pension Trust
6 and are recorded on the Pension Trust's books, not Qwest's books.
7
8 **Q. WHO BENEFITS FROM THE SURPLUS?**
9 A. Ratepayer, investors, current employees and retirees all benefit from the
10 surplus. As the sole beneficiaries of the pension plan, retirees and
11 current employees benefit from the surplus because it provides strong
12 assurance that their pensions will remain fully funded. Investors benefit
13 from the surplus because it prolongs the time before they will have to
14 begin funding the pension plan and because some of the surplus can be
15 used to pay health care benefits of current retirees. Ratepayers benefit
16 from the surplus because it is one of the variables used in the calculation
17 of pension expense credits recorded on Qwest's books (Pension Credits)
18 that reduce cost of service.
19
20 **Q. THEN WHAT IS THE PENSION ASSET?**
21 A. The Pension Asset is a balance recorded on Qwest's balance sheet.

Q. WHAT CAUSES THE PENSION ASSET ON QWEST'S BOOKS?

A. The Pension Asset has been created by the recording of Pension Credits on Qwest's books. Under FAS 87 accounting rules, pension expense is computed using a five factor formula that takes into account 1) service cost, 2) interest cost, 3) expected return on plan assets, 4) amortization of transition asset and 5) amortization of prior service cost. The first, second and fifth items typically generate positive expenses (charges). Because of the surplus in the Pension Trust, the computation of the third item (expected return on plan assets) and the fourth item (amortization of transition asset) generate negative expenses (credits). The sum of these five items has, for all but two years since Qwest's adoption of FAS 87 in 1987, generated a net negative expense (Pension Credit). The Pension Credit is an accrued negative expense on Qwest's books (not the Pension Trust's books).

Qwest cannot legally receive money from the Pension Trust to fund this negative pension expense accrual. Consequently, Qwest must charge this negative pension expense to a Pension Asset. So the Pension Asset is the accumulation of negative pension expense (Pension Credits) recorded in prior periods on Qwest's books.

Q. WHO BENEFITS FROM PENSION CREDITS?

A. Ratepayers, and to a small degree, investors benefit from Pension Credits. Ratepayers benefit from Pension Credits because they reduce cost of service and, therefore, put downward pressure on regulated rates. For instance, in the current test year, the Pension Credit puts downward pressure on revenue requirement by about $20 million. Investors benefit to a small degree from the Pension Credit because it increases reported earnings, but not cash flow.

Q. HAVE RATEPAYERS BENEFITED FROM ALL OF THE PENSION CREDITS RECORDED ON THE COMPANY'S BOOKS?

A. Yes. As I explained in my testimony concerning incentive compensation, ratepayers always benefit from decreases in costs reflected in regulated results of operations under cost of service regulation. Pension Credits are negative costs that reduce revenue requirement. Because every financial period is a test period (regardless of whether it warrants a case before the Commission), every dollar recorded as Pension Credit has a direct effect on revenue requirement. If revenue requirement changes enough, a rate case and a rates change will be warranted. But whether or not a rate case occurs, and regardless of the outcome of the case, ratepayers always benefit from the revenue requirement dampening effect of Pension Credits.

1 Mr. Carver observes that regulatory agencies are often reluctant to
2 commit the required resources to pursue and process formal earnings
3 complaint cases. [Carver, p. 132, lines 2 through 6] My experience
4 suggests that utilities are also reluctant to file a case unless the outcome
5 is likely to involve a significant change in rates. This reluctance to fully
6 litigate a case unless the financial stakes are substantial does not
7 diminish the benefit to utilities of any particular factor that increases
8 revenue requirement nor the benefit to ratepayers of any factor (such as a
9 pension credit) that decreases revenue requirement. It simply means that
10 all the factors that make up revenue requirement, considered in
11 aggregate, may not warrant a case.

12

13 **Q. RUCO IMPLIES THAT THE PENSION ASSET IS "THE NET AMOUNT**
14 **OF THE COMPANY'S PENSION OVER-FUNDING...." [LARKIN, P. 29,**
15 **LINE 18] IS THIS CORRECT?**

16 A. No. The surplus in the Pension Trust could be described (albeit
17 inaccurately) as the "net amount of pension over-funding". However, it is
18 not a correct description of the Pension Asset. The Pension Asset is the
19 accumulation on Qwest's books of Pension Credits and pension expense
20 debits over the years since Qwest's adoption FAS 87. Beginning on page
21 117, line 3, Mr. Carver's testimony also explains the accounting that
22 creates the Pension Asset and on page 118, chronicles the Pension

Credits and debits that have resulted in the Pension Asset on Qwest's books.

Q. WHAT IS THE SOURCE OF FUNDING FOR THE PENSION ASSET?

A. One of the fundamental accounting concepts that first year accounting students learn is that all assets on a balance sheet must be funded by liabilities or equity. Because Qwest cannot withdraw funding money from the Pension Trust for negative expense and must, instead, debit the Pension Asset, the source of funding for the Pension Asset is Qwest's investors who provide the money to fund debt and equity on Qwest's books.

Q. MR. LARKIN CLAIMS THE PENSION ASSET SHOULD BE REMOVED FROM RATE BASE BECAUSE THE COMPANY HAS NOT CLEARLY DEMONSTRATED THAT THE PENSION ASSET HAS BEEN FUNDED BY SHAREHOLDERS. IS HE CORRECT?

A. No. The accounting that shows the Pension Asset is funded by investors is rudimentary and clear. The source of funding for the Pension Asset is the debt and equity on the Company's books. It follows that under the same ratemaking standards that apply to the other major balances in the Company's Arizona rate base, the Company has fully met its obligation to demonstrate that investors have funded the Pension Asset.

In contrast, Mr. Larkin claims that the sources of the funding for the Pension Asset are:

> (1) the switch to accrual accounting when Statement of Financial Accounting Standards 87 (FAS 87) was adopted by the Company; (2) ratepayer payments to the Company for amounts of pension expense that were reflected in rates; and (3) earnings on the pension trust assets. . [Larkin, p. 30, line 10 to p. 31, line 2.]

None of these assertions is correct. The adoption of FAS 87 was not a financial transaction. So it could not be a source of funding. Instead, the adoption of FAS 87 was a change in accounting principle that made it possible for the Company to begin accruing the Pension Credits that gave rise to the Pension Asset.

Ratepayers' payments for services are clearly a source of positive cash flow. But they are not a source of funding. No sound accounting theory supports the contention that payments for services are contributions of capital to a privately held corporation.

Earnings on assets in the Pension Trust increase its balance. Increases in the Pension Trust balance increase the expected return on plan assets used in the calculation of pension expense. Increased expected return on plan assets reduces pension expense (in Qwest's case to a negative number). Accruing negative pension expense causes the accrual of the Pension Asset. However, the mere recording of these accruals provides no funding.

By law, Qwest cannot withdraw money from the Pension Trust for reimbursement of the Pension Credits recorded on its books. So Qwest must record negative pension expense under FAS 87 accounting rules, but can get no money from the Pension Trust to fund the negative expense. Without any other source for funding the asset, it falls to Qwest's investors to supply the capital for funding the Pension Asset. Contrary to Mr. Larkin's assertion, the earnings on the trust fund assets do not provide a source of funding for the Pension Asset because the law prevents Qwest from getting access to them for that purpose.

Q. WHY DOES STAFF BELIEVE THE PENSION ASSET SHOULD BE REMOVED FROM RATE BASE?

A. As I understand it, Mr. Carver's opinion is as follows:

- The Company improperly relies on its balance sheet accounting records for purposes of determining the amount that is includable in rate base. [Carver, p. 120, lines 18 and 19; p. 121, lines 5 through 14, p. 129, lines 16 through 19]
- In order to allow the Pension Asset in ratebase, the Company bears a burden of demonstrating that cumulative Pension Credits (the negative pension expense) of at least $62.2 million (intrastate) have been flowed through to its ratepayers. [Carver p. 119, lines 22 through 24; p. 120, line 25; p. 122, lines 17 through 20; p. 127, lines 15 through 17]
- The Company has not made this demonstration. [Carver, p. 120, lines 20 through 23; p. 121, lines 15 through 19; p. 128, lines 6 through 8, p. 128, lines 14 through 16]
- The Company can not make this demonstration because it is not possible to make this demonstration. [Carver, p. 120, lines 4 through 6;

p. 121, lines 15 through 19; p. 122, lines 20 and 21; p. 123, lines 17 and 18]

Q. DO YOU AGREE WITH MR. CARVER'S OPINION?

A. No. Mr. Carver has departed from sound ratemaking principles and invented his own special rule for deciding whether Pension Asset should be included in ratebase. By his own admission, it is not possible to satisfy his rule.

Q. WHY DO YOU SAY MR. CARVER HAS DEPARTED FROM SOUND RATE MAKING PRINCIPLES?

The primary components that must be considered for inclusion in rate base are:

1. Working Capital
2. Plant in service
3. Accumulated depreciation
4. Accumulated deferred taxes
5. Pension Asset

Of these five items, the last three are created by expense accruals: depreciation expense accruals create Accumulated Depreciation; deferred tax expense accruals create Accumulated Deferred Taxes, and negative pension expense accruals create the Pension Asset.

As Mr. Carver explains, under widely accepted rate making principles, a cost (which includes accrued expenses) is presumed to be covered by

existing rates, regardless of whether the cost of service study underlying those rates included a specific allowance for that unique cost. Were it otherwise, "the result could entail an endless reconciliation process comparing each element of actual costs during the rate effective period with the cost of service details underlying the preceding rate case order." [Carver, p. 132, lines 7 through 24] In fact, the rule against retro-active ratemaking is intended to prevent just such an "endless reconciliation process" (like the one Mr. Carver suggests must be performed to allow inclusion of Pension Asset in ratebase).

Under this widely accepted ratemaking principle, the balances on a utility's balance sheet that were created by accruals (Accumulated Depreciation, Accumulated Deferred Taxes, and Pension Asset) are treated as having been recovered or provided in rates whether or not they actually were.

> When rate base is constructed, the original cost of the assets is reduced by the accumulated provisions for depreciation. These accumulated provisions represent the prior years allocations [(accruals)] of depreciation for which the utility has had the opportunity to recover through rates but which recovery is not assured. [Principles of Public Utility Rates, Bonbright, Danielson and Kamerschen, (1988) p. 271, emphasis added]

Because this general principle is, and has long been accepted in Arizona, when the Commission reviews the ratebase in this proceeding, it will not require Staff and RUCO to engage in any reconciliation process to determine whether, and to what extent, the Company actually recovered in rates in prior years the Accumulated Depreciation and Accumulated

Deferred Taxes on Qwest's books. Instead, the parties, (including Staff) will presume that the Company has recovered all Accumulated Depreciation and all Accumulated Deferred Taxes on its books.

Regarding the Pension Asset, Mr. Carver's opinion departs from the widely this accepted presumption. He claims that it has "limited application" [Carver, p. 123, lines 3 through 7] and argues that the Pension Asset can be included in ratebase only if the Company meets a burden of a reconciliation process that shows that the Pension Credits recorded on the books were flowed through to ratepayers in rates. He also believes the Company cannot and could never meet that burden.

Not true

Q. WHY DO YOU SAY MR. CARVER HAS INVENTED HIS OWN STANDARD?

A. Mr. Carver's testimony is careful to couch his advocacy concerning the reconciliation requirement as his opinion. Mr. Carver's opinion—that the Company bears a burden of demonstrating through a reconciliation that cumulative Pension Credits (the negative pension expense) have been flowed through to its ratepayers—is not a generally accepted ratemaking principle. If it were, then the other elements of ratebase that are created by expense accruals (Accumulated Depreciation and Accumulated Deferred taxes) would also be subject to the same burden that Mr. Carver would impose on the Pension Asset. In fact, his position directly violates

widely accepted ratemaking standards by contravening the rule against retroactive ratemaking.

Mr. Carver asserts that the widely accepted presumption that accrued expenses have been recovered or flowed through in rates does not extend to Pension Asset. [Carver, p. 132, line 24 through p. 133, line 2] However, he fails to offer any sound reason why Pension Asset should not be subject to the same ratemaking principles that govern the other elements of ratebase.

Q. MR. CARVER CLAIMS THAT, "THE QUESTION OF COST RECOVERY WITH REGARD TO NEGATIVE PENSION EXPENSE HAS A SUBSTANTIAL HISTORICAL CONTEXT WHICH, IF IGNORED, COULD LEAD TO INAPPROPRIATE CONCLUSIONS." [CARVER, P. 121, LINES 19 AND 20] DOESN'T THIS "SUBSTANTIAL HISTORICAL CONTEXT" JUSTIFY HIS DEPARTURE FROM WIDELY ACCEPTED RATEMAKING PRINCIPLES?

A. No. Mr. Carver recites the history of pension plan funding prior to and after the adoption of FAS 87 and observes that "the plan assets [in the Pension Trust] have accumulated over a long period of time, not just the last few years." [Carver, p. 122, lines 8 and 9] He also points out, correctly, that the high returns the Pension Trust has earned have "contributed to the negative pension expense being recorded by the

Company in accordance with FAS87, since 1987." [Carver, p. 122, lines 14 through 16] However, he offers no explanation about why he believes these factors justify a departure from widely accepted ratemaking principles and adoption, instead, of his proposed standard.

Accumulated depreciation and Accumulated deferred taxes also have a "substantial historical context." Like the funding of the Pension Trust and accrual of the Pension Asset, both Accumulated Depreciation and Accumulated Deferred Taxes have been created over long periods of time. Were the Commission to apply to them the same burden of reconciliation that Mr. Carver proposes for the Pension Asset, the reconciliation would, under Mr. Carver's interpretation of his own rule, extend back in time to the Company's first investment in Arizona. So a "substantial historical context" does not differentiate the Pension Asset from the other accrual-created balances on the Company's books and does not, in any event, justify a departure from widely accepted ratemaking standards.

Q. MR. CARVER ASSERTS THAT "IN SPITE OF THE REALITIES OF THE RATEMAKING PROCESS, THE COMPANY HAS BASICALLY RELIED ON AN 'AS RECORDED' COST RECOVERY THEORY...." [CARVER, P. 133, LINES 10 AND 11] HOW DO YOU RESPOND?

This assertion is curious. The Company relies on the "as recorded" cost recovery theory because of the realities of the ratemaking process, not in spite of them. Apparently, Mr. Carver seeks to create a separate and different reality for Pension Asset from the ratemaking reality that applies to the other elements of ratebase.

In the reality Mr. Carver seeks to create, he establishes a rule that, by his own admission, the Company can never satisfy. He proposes a reconciliation process to quantify the accumulated net pension recoveries from, or benefits provided to ratepayers. He complicates this process with his own set of conditions.

> First, I do not believe that it is possible to accurately quantify the accumulated net pension recoveries from or benefits provided to ratepayers. In order to prepare such a calculation, I believe that it would be necessary to reconcile the amount of actual pension costs recovered from ratepayers with the amounts actually contributed to the pension fund since the establishment of the pension plan. [Carver, p. 120, lines 4 through 9]

So under Mr. Carver's rule, the reconciliation of recorded expense to recovery and flow through must go back to the beginning of the pension fund and reconcile all of the rate orders and recorded expenses since then. He also requires that settlements of rate cases be ignored.

> In assessing the amount of pension credits flowed through to ratepayers, it is imperative that only those orders which specifically address the various components of cost of service be considered. [Carver, p. 126, lines 1 through 3]

By proposing a rule that requires a reconciliation back to the beginning of the pension plan, Mr. Carver has invented a "Catch 22" type of rule—one that, as he readily acknowledges, can never be satisfied.

Q. WHY DO YOU SAY MR. CARVER'S PROPOSED STANDARD FOR INCLUDING PENSION ASSET IN RATE BASE VIOLATES THE RULE AGAINST RETROACTIVE RATEMAKING?

A. Mr. Carver testifies:

> It is generally recognized that to allow utilities to collect additional funds from ratepayers in the future simply because expenses were incurred which had not been specifically provided for in the determination of the existing base rates is considered retroactive ratemaking. While past expenses are frequently employed in quantifying or developing the prospective cost of service on which overall rates are based, it is improper to establish future rates at levels intentionally designed to recover past losses or under-recoveries due to historical imbalances in the matching of rates and actual expenses. [Carver, p. 133, lines 3 through 9]

Mr. Carver's Pension Asset proposal would do exactly what he says is improper retroactive ratemaking. His reconciliation is a matching of recovery provided by prior rates with actual expenses accrued and capitalized on Qwest's balance sheet. To the extent recovery of negative expense by ratepayers was less than the negative expense accrued, he would recognize only the lesser amount. Hence, he would establish future rates at levels intentionally designed to remedy ratepayers' alleged

1 past under-recoveries of pension credits by reducing the capitalized
2 balance to the level of actual recoveries.

3 His proposal violates the rule against retroactive ratemaking in the same
4 way the rule would be violated if Qwest were allowed to reduce
5 Accumulated Depreciation because the amount of depreciation included
6 in rates was less than the amount of depreciation it recorded on its books
7 in prior rate effective periods. The only difference between Mr. Carver's
8 proposed retroactive ratemaking treatment of Pension Asset and the
9 retroactive ratemaking treatment of Accumulated Depreciation I have just
10 described is that his case deals with credits to pension expense and mine
11 deals with debits to depreciation expense.

12

13 **Q. DO YOU SEE ANY INCONSISTENCIES IN MR. CARVER'S**
14 **ARGUMENTS AND HIS CONCLUSION THAT RATEPAYERS HAVE**
15 **NOT RECEIVED SUBSTANTIAL BENEFITS FROM THE RECORDING**
16 **OF PENSION CREDITS? [CARVER, P. 123, LINE 10]**

17 A. Yes. On the same page that Mr. Carver asserts ratepayers have not
18 received substantial benefits [Carver, p. 123, line 10], he also asserts that
19 it is not possible to accurately quantify the benefits ratepayers have
20 received. [Carver, p. 123, lines 17 and 18] With regard to cases in which
21 revenue requirement was settled, Mr. Carver also admits, "I am unable to
22 conclude what amount of any pension credits were embedded within the

test years used in either of these proceedings or whether any credits were partially or fully flowed through to benefit ratepayers...." [Carver, p. 126, lines 26 through 30]

If it is not possible to accurately quantify the benefits provided to ratepayers, then any conclusion that ratepayers have received no substantial benefits necessarily must be questioned.

If it is not possible for the author of a proposed standard to determine whether or not it has been met, then that standard should be questioned. The fact that Mr. Carver offers two different calculations of the benefits ratepayers have received [Carver Appendix SCC-1 and Appendix SCC-2], and that these two calculations differ by more than $100 million, suggests and illustrates why the reconciliation standard that he advocates is not workable or reasonable.

Q. BOTH STAFF AND RUCO CITE THE COMMISSION'S ORDER IN QWEST'S LAST RATE CASE IN SUPPORT OF THEIR POSITION. [CARVER, P. 133, LINE 16 THROUGH P. 134, LINE 14; LARKIN, P. 29, LINES 15 THROUGH 23] WHY HAS QWEST TAKEN A POSITION DIFFERENT FROM THE COMMISSION'S PRIOR ORDER?

A. Qwest respectfully disagrees with the conclusion the Commission reached in the prior order. As my testimony makes clear, we believe the Commission should determine the amount of Pension Asset by applying

1 the widely accepted standard for determining the elements of ratebase2
2 instead of Mr. Carver's proposed standard.
3
4 **Q. HOW DO YOU RECOMMEND THE COMMISSION TREAT THE**
5 **PENSION ASSET FOR RATEMAKING PURPOSES?**
6 A. I recommend that the Commission reject the imposition of Mr. Carver's
7 proposed standards for inclusion of Pension Asset in ratebase and,
8 instead, employ the widely accepted standard of establishing ratebase
9 that relies on balances as recorded. I recommend the Commission not
10 deny investors their right to recover a return on their capital invested in the
11 Pension Asset. Therefore, I recommend the Commission make no
12 adjustment to remove the Pension Asset from rate base.
13 If the Commission chooses to deny investors a return on the Pension
14 Asset by imposing a reconciliation burden that cannot be met, then the
15 Commission should 1) ensure that no further Pension Asset is created by
16 ceasing any further recognition of negative pension expense in regulated
17 results of operations and cost of service and 2) return the Pension Asset
18 to investors by amortizing it into cost of service over an appropriate
19 amortization period.
20 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

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[2] In an Order adopted December 17, 1987, in Docket 86-497, the FCC ruled, at paragraph 43 regarding items to be included in rate base, "We will allow deferred charges related to...pension fund payments in

1 A. Yes.

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excess of expenses recognized for regulatory purposes."

1 plans from the perspective of the management compensation discipline.
2 Accordingly, I have asked Qwest's Director of Management
3 Compensation, Mr. Jeffrey Haynes, to provide his expert opinion
4 regarding the effectiveness, reasonableness and prudence of Qwest's
5 1999 APB, STIP and ITCSBP. Attachment PG-1 is Mr. Haynes sworn
6 affidavit that the performance criteria of Qwest's 1999 APB, STIP and
7 ITCSBP were reasonable and prudent from a management compensation
8 standpoint and that the total compensation Qwest paid its managers was
9 reasonable in amount based on a comparison with other firms.

10

11 **PENSION ASSET**

12 ***Rejoinder To RUCO's Surrebuttal***

13 **Q. ARE YOU RESPONDING TO SURREBUTTAL FROM RUCO?**

14 A. No. RUCO did not file any surrebuttal testimony on Pension Asset.

15

16 ***Rejoinder To Staff's Surrebuttal***

17 **Q. MR. CARVER SUGGESTS THAT YOU CRITICIZE HIS OPINION ONLY**
18 **BECAUSE IT DIFFERS FROM YOUR OWN. [CARVER, P 51, LINES. 9--**
19 **11. IS THIS TRUE?**

20 A. No. I drew attention to the fact that Mr. Carver relies only on his opinion
21 because that opinion:

22 1. is unsupported by sound ratemaking principles;

2. supports a test for disallowance that violates the rule against retroactive ratemaking;

3. supports a standard-of-proof that even Mr. Carver acknowledges cannot be satisfied;

4. applies to the one major balance created by accruals that happens to reduce ratebase (Pension Asset); and

5. does not apply to the two major balances created by accruals that do not happen to reduce ratebase (accumulated depreciation and accumulated deferred taxes).

Q. MR. CARVER SUGGESTS THE STANDARD-OF-PROOF ON PENSION ASSET SHOULD BE DIFFERENT THAN THE STANDARD-OF-PROOF THAT APPLIES TO ACCUMULATED DEPRECIATION AND ACCUMULATED DEFERRED TAXES BECAUSE "PENSION ACCOUNTING CHANGED DRAMATICALLY WITH THE ADOPTION OF SFAS 87." [CARVER SURREBUTTAL P. 52, L. 3—13] DO YOU AGREE WITH HIS REASONING?

A. No. Mr. Carver relies on a distinction that makes no difference. No ratemaking principle suggests that one element of the balance sheet should be subject to a different standard-of-proof than all the other elements of the balance sheet. The change in accounting brought about by SFAS 87 does not justify imposing on Pension Asset a standard-of-proof that violates the rule against retroactive ratemaking.

1

2 Nor does the fact that the Pension Asset was created by a "dramatic" or
3 "radical" accounting change suggest that it should be treated differently.
4 Pension Asset is not the only ratebase balance created by a significant
5 change. A similarly significant change in federal income tax law gave rise
6 to the recording of accumulated deferred taxes that can and do vary from
7 year to year.

8

9 Section 441 of the Tax Reform Act of 1969 enacted rules requiring the
10 "normalization method of accounting" as a condition to the use of
11 accelerated methods of depreciation for purposes of computing income
12 taxes applicable to regulated utility plant placed in service after January 1,
13 1970. Only after the rules requiring the normalization method of
14 accounting went into effect did Mountain Bell (Qwest's predecessor in the
15 1970's) and all the other Bell Operating Companies begin to compute
16 income taxes using the accelerated methods of depreciation that have
17 created the accumulated deferred tax balances on the Company's books
18 today. The fact that the Pension Asset was created by a "dramatic" or
19 "radical" change hardly makes it unique.

20

21 **Q. IF ACCUMULATED DEFERRED TAXES WERE EXCLUDED FROM**
22 **RATEBASE FOR FAILING THE SAME TEST MR. CARVER WOULD**
23 **APPLY TO PENSION ASSET, HOW MUCH WOULD THE TEST YEAR'S**
24 **RATEBASE BE INCREASED?**

A. If Qwest's 1999 test year Arizona ratebase excluded accumulated deferred taxes, the ratebase would increase over $300 million, an amount far greater than the amount ratebase would decrease if Pension Asset were excluded.

Q. IN SURREBUTTAL, MR. CARVER CLAIMS THAT IF PENSION ASSET IS TO BE INCLUDED IN RATEBASE, "REGULATORS MUST BE ASSURED THAT RATEPAYERS HAVE FULLY ENJOYED REDUCED RATES OR SOMEHOW BEEN PROVIDED THE BENEFIT OF THE NEGATIVE COSTS RESULTING FROM THE ADOPTION OF FAS87." [CARVER SURREBUTTAL, P. 53, L. 14] DO ALL REGULATORS REQUIRE SUCH ASSURANCE?

A. No. I am aware of several jurisdictions in which regulators have included pension asset in ratebase without imposing the standard-of-proof that Mr. Carver argues is required. Such jurisdictions include, for example, the federal jurisdiction, Colorado, Iowa, Minnesota, Oregon and Washington.

The FCC's rules specifically provide for inclusion of Pension Asset in ratebase. In Docket 86-497, the FCC examined its rules to prescribe components of rate base and net income of dominant carriers such as the Company. In an Order adopted December 17, 1987, in Docket 86-497, the FCC ruled, at paragraph 43 regarding items to be included in rate base,

> We will allow deferred charges related to...pension fund payments in excess of expenses recognized for regulatory purposes.

Hence, for ratemaking purposes, the FCC determined to include the pension asset in rate base in 1987.

Q. DOES THE PUBLIC UTILITY COMMISSION OF COLORADO REQUIRE THE STANDARD-OF-PROOF MR. CARVER SUGGESTS REGULATORS MUST IMPOSE?

A. No. Pages 28 through 30 of USWC witness G. Y. Fleming's direct testimony in Colorado Docket No. 90S-544T, explains that his filing follows the FCC's approach regarding the pension asset. Mr. Fleming's testimony quoted footnote 35 in the FCC's Report and Order in Docket No. 86-497 adopted December 17, 1989. That footnote states:

> In the Pension and Debt Proceeding (note 31 supra), we concluded that it would be appropriate to include in the rate base pension fund payments in excess of recognized expenses. We also concluded that in the converse situation, the excess should be deducted from the rate base, to the extent recognized expenses exceed pension fund payments. (emphasis added)

In rate case Docket No. 90S-544T, USWC included a pension asset as part of its Cash Working Capital (CWC) requirement in the amount of $13.6 million. Following negotiations and a stipulation in the case, this asset was removed from the CWC calculation and included as a rate base item.

Q. DOES THE IOWA UTILITIES BOARD REQUIRE THE STANDARD-OF-PROOF MR. CARVER SUGGESTS REGULATORS MUST IMPOSE?

A. No. The IUB did not initially accept adoption of SFAS 87 so the pension credit was not initially recognized in Iowa cost of service. In 1994, in Docket No. RPU-93-9 (TF-94-343) the IUB changed its position and ordered amortization of the pension credit into cost of service over seven years. In regards to the pension asset, Page 6 of the Commission's order states:

> The rate base will not be adjusted. It is based on a 13-month average, and the record contains no persuasive evidence that an adjustment is necessary. <u>As the FAS 87 negative pension expense is amortized</u>, <u>future 13-month average rate bases will reflect the change.</u> (emphasis added)

Q. DOES THE MINNESOTA DEPARTMENT OF PUBLIC SERVICE REQUIRE THE STANDARD-OF-PROOF MR. CARVER SUGGESTS REGULATORS MUST IMPOSE?

A. No. On pages 6 and 7 of the comments concerning USWC's incentive regulation plan, dated May 17, 1996, filed in Minnesota Docket No. P421/EM-89-860, the Minnesota DPS explained :

> The pension asset has been included in every filing since the first one in 1990, and its basis comes from the settlement in Docket No.P421/C-86-354, where negative rather than positive pension expense was first recognized. The Incentive Plan calls for the inclusion of a cash working capital requirement, and the pension asset component of the cash working capital requirement reflects the accumulation of negative pension expenses as a result of an over-funded pension trust. No cash flows back to USWC for the negative expense credit because the Company is not reimbursed by the trustee for temporary excesses in the pension fund. Consequently, this deferred asset is included in the cash working capital requirement representing an accumulated cash drain as a result of the negative pension expense credited to USWC's operations. If and when it is determined that additional funds are needed in the pension trust, a positive expense will be recognized, and a corresponding reduction will be made in the deferred asset balance. <u>Until future pension expense fully reduce this deferred</u>

> asset, it is included in the cash working capital requirement of USWC's rate base so that a return can be earned on this balance of negative expenses that have not been compensated by cash flows from the pension fund. (emphasis added)

Q. DOES THE PUBLIC UTILITY COMMISSION OR OREGON REQUIRE THE STANDARD-OF-PROOF MR. CARVER SUGGESTS REGULATORS MUST IMPOSE?

A. No. In Docket UT 125, the pension asset was initially a contested issue. However, after discussions between the Company and Public Utility Commission of Oregon Staff, the issue was settled. The following appears on page 29 of Oregon Staff Exhibit 87 which is witness Lambeth's Supplemental Testimony on Support of the Second Stipulation in Docket UT 125.

> Q. DO STAFF AND USWC AGREE ON THIS ADJUSTMENT, SHOWN IN EXHIBIT REVISED STAFF/3, LAMBETH/17, COLUMN 35?
>
> A. Yes. This issue is completely settled. Exhibit Staff/88, paragraph 5, shows that staff and USWC agree to (1) leave the negative expense in operating expenses, (2) leave accumulated deferred taxes in the rate base, and (3) add the pension asset to the rate base.
>
> Q. WHAT IS THE BASIS OF THE STIPULATION?
>
> A. I added the pension asset to the rate base because it is fair to the company and to its customers.

Q. DOES THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION REQUIRE THE STANDARD-OF-PROOF MR. CARVER SUGGESTS REGULATORS MUST IMPOSE?

A. No. In Docket No. UT-950200, the Washington Utilities and Transportation Commission's Order, dated April 11, 1996, addresses the pension asset on pages 66 and 67. In conclusion, it provides:

> The Company proposes to include the pension asset as a discrete item in rate base. Ms. Wright discusses the pension asset adjustment, PFA-3. which increases rate base by $69.9 million.
>
> * * *
>
> The commission accepts the Company position on this adjustment. All of the return earned in the fund is used to reduce the need for further investment by the company, and thus it works to reduce the pension expense. That was the company's position in docket No. UT-930307. The Company's proposal appears to be consistent with the prior order. The order in that docket states that the commission does not question the prudence of the asset, and that the reason for rejection at that time was merely that it should be examined in conjunction with a total working capital analysis such as the one presented in this proceeding.

Q. IN QWEST'S LAST RATE CASE DID THE ACC CONCLUDE THAT PENSION ASSET SHOULD BE EXCLUDED FROM RATEBASE AS A MATTER OF PRINCIPLE?

A. No. The ACC's order dated January 3, 1995, in Docket No. E-1051-93-183, UT-950200, addresses the pension asset issue on pages 3 through 5. In pertinent part, the order states:

> We concur with the Company that the overfunded pension assets which were contributed by shareholders should be included in rate base. It would be unfair to permit ratepayers to benefit by reduced expenses resulting from capital invested by Company shareholders.

1 **Q. THEN WHY DID THE ACC EXCLUDE PENSION ASSET FROM**
2 **RATEBASE IN QWEST'S LAST RATE CASE?**

3 A. In Qwest's last rate case Mr. Carver proposed the same standard-of-proof
4 for Pension Asset that he is proposing in this case. In the prior case, the
5 ACC concluded:

6 Although the Company has presented evidence in an effort to
7 demonstrate that since 1986 the shareholders have provided the
8 monies which resulted in the current overfunded pension asset,
9 Staff's analysis has raised significant questions as to the accuracy
10 of the Company's claim. Even if we were convinced of the
11 accuracy of the Company's number for the 1976-1993 period, we
12 would still not be able to conclude that shareholders have
13 advanced the excess pension amounts. Accordingly, we must
14 deny the Company's request to include the net amount overfunding
15 of $36,213,000 in rate base.

16 I did not attempt to satisfy Mr. Carver's proposed standard-of-proof
17 because it is not supported by sound ratemaking principles, violates the
18 rule against retroactive ratemaking, is proposed for no other element of
19 ratebase and is, by Mr. Carver's own admission, impossible to satisfy. For
20 these reasons, I respectfully request the ACC to reconsider the
21 evidentiary test and standard-of-proof upon which it relied to disallow
22 Qwest's Pension Asset in Qwest's last rate case.

23

24 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

25 A. Yes.

1 **PENSION ASSET (A-19)**

2 Q. PLEASE EXPLAIN THE ADJUSTMENT FOR PENSION ASSET (A-19).

3 A. This adjustment adds to ratebase the Company's Utah intrastate pension asset.

4 The adjustment increases ratebase $20,398,078.

5

6 Q. THIS IS NOT THE FIRST TIME USWC PROPOSED THAT ITS REVENUE

7 REQUIREMENT INCLUDE A PENSION ASSET IN RATEBASE. THE

8 COMMISSION HAS DENIED THE COMPANY'S PRIOR REQUESTS. WHY ARE

9 YOU AGAIN PROPOSING THAT THE PENSION ASSET BE INCLUDED IN

10 RATEBASE?

11 A. On page 50 of the Commission's Order in Docket 95-049-05 the Commission

12 found that a comprehensive analysis of the alternatives regarding pension asset was

13 necessary but was not possible given the incomplete state of the record. The

14 Commission also found that the claims and counterclaims in the case did not produce

15 evidence permitting the Commission to determine whether the Company's proposal

16 involves retroactive ratemaking and what the effect of regulatory lag is on the calculation

17 of the size of the pension asset.

18 I believe I have rectified that problem. Attached as Exhibit 4 is what I hope will

19 be for the Commission a comprehensive analysis of the pension asset question. I had

20 originally intended to include the analysis as part of this written testimony. But as the

1 volume of questions and answers grew to 49 pages, I decided it would be best to include
2 the analysis as a separate exhibit.

3 **PLANT UNDER CONSTRUCTION (A-20)**

4 Q. PLEASE EXPLAIN THE ADJUSTMENT FOR PLANT UNDER
5 CONSTRUCTION (A-20).

6 A. In 1977, the FCC ordered carriers to use the "capitalization" method of accounting
7 for calculating the Allowance for Funds Used During Construction (AFUDC) on long
8 term construction projects and the "rate base" method for short term construction
9 projects. Since the Commission's July 23, 1980 order in Docket 80-049-01, the
10 calculation of AFUDC in Utah on *both* long and short term construction projects has used
11 the capitalization method. Accordingly, since that time, USWC's revenue requirement
12 has included an adjustment to reflect the difference between using the rate base method
13 for short term construction for FCC accounting purposes and the capitalization method
14 for short term construction for Utah intrastate purposes.

15 On February 28, 1995, the FCC released an order in CC Docket No. 93-50 that
16 adopted a "revenue requirement offset" method of for both long and short term
17 construction projects. The order offers several valid reasons for its selection of this
18 method including its conformance to GAAP, its incentives for capital investment, and the
19 mitigation of cost of service provided by capitalizing the cost of funds used during
20 construction. Attached as Exhibit 5 is a copy of the order. Following is a chart that
21 identifies the FCC's old and new methods and the method Utah has been using.

PENSION ASSET (A-19)

Q. THE COMMITTEE ASSERTS THAT IN REQUESTING INCLUSION OF PENSION ASSET IN RATEBASE, "THE COMPANY SEEKS TO IMPROPERLY COMBINE THE HISTORICAL ACCOUNTING FOR PENSION COSTS WITH PRESUMED RATEMAKING EFFECTS IN AN ATTEMPT TO DEMONSTRATE THAT USWC'S CUSTOMERS HAVE BENEFITED TO THE DETRIMENT OF ITS INVESTORS."[51] DO YOU AGREE?

A. I agree in part and disagree in part. I agree that USWC seeks to combine the historical accounting for pension costs with presumed ratemaking effects to demonstrate that USWC's customers have benefited. I strongly disagree that this type of demonstration is in any way inappropriate.

In cost of service ratemaking, it is axiomatic that all of the components of ratebase are calculated using the accounting records of the utility. No attempt is made to measure and reconcile the actual recovery in rates of the various elements that make up the ratebase. Nevertheless, this is precisely what the Committee argues USWC must do in order to justify inclusion of pension asset in ratebase.

> Q. Do you agree with the Company that its investors have funded additional cash flow to ratepayers as a result of recording pension credits?
> A. No. Mr. Grate's Exhibit 4 does not provide any definitive or comprehensive analysis of the amount of pension credits ratepayers have actually received through the ratemaking process. Carver, p. 33, l. 11.

* * *

> In order to prepare such a calculation, I believe that it would be necessary to reconcile the amount of actual pension costs recovered from ratepayers with the amounts actually contributed to the pension fund since the establishment of the pension plan. Carver, p. 35, l. 12.

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[51] Carver, p. 33, l. 15.

1 Q. IS THE TEST FOR INCLUSION OF PENSION ASSET IN RATEBASE THAT
2 THE COMMITTEE ADVOCATES A REASONABLE AND JUST STANDARD?
3 A. No. It is not reasonable or just for four reasons. First, it is unworkable. As the
4 Committee's own testimony illustrates,[52] the process of attempting to provide definitive
5 or comprehensive analyses of the amount of costs or credits ratepayers have actually paid
6 or received through the ratemaking process does not lend itself to any reliable answer.
7 The problems of determining what costs and credits were in rates, and the amount of
8 investment upon which the Company is entitled to recovery are hard enough to
9 determine for a single test period. As the Committee readily admits,[53] a reconciliation
10 that spans many years or even decades presents practically insurmountable problems,
11 particularly where (as is the case for USWC), some rate changes were stipulated and
12 others were voluntary. Yet, inexplicably, the Committee suggests that USWC should take
13 into account the funding history of USWC's pension plan.[54] So the Committee is

---

[52] "Q. Why do you believe that this Company prepared analysis does not support USWC's proposal to include the pension asset in rate base? A. There are several reasons why I believe that this analysis does not accurately depict the amount of pension credits which may have been flowed through to ratepayers. First, the Company's analysis does not attempt to identify or quantify the amount of pension expense included in rates which were in effect from January 1, 1987 through September 22, 1988. Second, it appears that the orders relied upon by the Company for Docket Nos. 88-049-07 and 90-049-03/06 were associated with interim orders of the Commission or were resolved through negotiated agreements. Third, the Commission had also concluded that the Company had over-earned during the late 1980's. Overall, I believe that these concerns raise considerable doubt as to whether the Company has been able to demonstrate that ratepayers have benefited at the expense of USWC's investors." Carver, p. 40, l. 6.

[53] "I do not believe that it is possible to accurately quantify the accumulated net pension recoveries from or benefits provided to ratepayers." Carver, p. 35, l. 10.

[54] "Second, the Company's pension plan and pension accounting have existed for decades. By focusing solely on the accounting entries underlying the pension asset balance recorded since 1987, the Company has excluded from consideration a substantial portion of the history which underlies the

1 proposing a standard of proof for inclusion of pension asset in ratebase that, by its own
2 account, is practically impossible to satisfy.
3
4 Q. WHAT IS THE SECOND DEFECT IN COMMITTEE'S PROPOSED TEST
5 FOR INCLUSION OF PENSION ASSET IN RATEBASE?
6 A. The second defect is that the Committee's standard is inconsistent with and
7 contrary to the standard by which the other elements of ratebase are determined. The
8 other elements of costs and credits that are reflected in ratebase balances are determined
9 by direct reference to what appears on a utility's books of account. For example, the
10 calculation of ratebase includes two major components that reduce ratebase: depreciation
11 reserves and deferred tax reserves. Both are determined based on what is shown on the
12 utility's books. Neither requires a definitive or comprehensive analysis of the amount of
13 depreciation expense or deferred tax expense ratepayers have actually paid through the
14 ratemaking process.
15 The Committee fails to even address-- much less explain--why a reconciliation of
16 the amount of pension expense in rates is required to justify inclusion of pension asset in
17 ratebase while no reconciliation of depreciation expense included in rates or deferred tax
18 expense included in rates is required to justify the inclusion of depreciation reserves or
19 deferred tax reserves in ratebase.

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pension fund, pension accounting and cost of service." Carver, p. 35, l. 19. "The Company has simply not demonstrated that the overall cumulative amount of pension costs recovered from ratepayers through the cost of service has, over the long-term, been fully contributed to the pension plan. To 'prove' investor harm, a longer term analysis comparing rate recoveries to pension fund contributions would be required." Carver, p. 38, l. 12.

1 Clearly the Committee understands that cost-of-service ratemaking principles
2 assume that costs (and by mathematical extension, credits) are covered by existing rates
3 whether or not they actually are.[55] One result of this assumption is that if a component of
4 ratebase is created by the recordation of expenses (such as depreciation and deferred
5 taxes) and credits (such as negative deferred taxes) the expenses or credits are presumed
6 to be recovered or provided in rates. Yet the Committee fails to explain why this widely
7 accepted ratemaking principle does not apply to pension asset. Instead, it simply asserts
8 that a different standard applies.[56]
9
10 Q. DOESN'T THE COMMITTEE'S RECITATION OF THE COMMISSION'S
11 ORDER REGARDING SALES OF RURAL EXCHANGES SHOW THAT NOT ALL
12 COSTS AND CREDITS ARE PRESUMED TO BE INCLUDED IN RATES?[57]

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[55] "It is widely accepted that cost based utility rates, once established by a ratemaking body, are deemed to be just and reasonable until such time as a moving party carries its burden of proof to establish that said rates are no longer just and reasonable. Costs incurred by the utility are often presumed to be covered by existing rates, regardless of whether the cost of service study underlying said rates included a specific allowance for that unique cost. Otherwise, the result could entail an endless reconciliation process comparing each element of actual costs during the rate-effective period with the cost of service details underlying the preceding rate case order." Carver, p. 47, l. 9.

[56] "However, this presumption does not extend to the actual adjustment of utility rates charged ratepayers between rate cases to track specific cost levels, such as negative pension expense or represcription changes." Carver, p. 47, l.16.

[57] "It is true that a common simplifying assumption in the ratemaking process is that costs are recovered as expensed. However, this assumption is not globally applied. In Docket No. 94-049-08, the Commission issued a Report and Order on May 9, 1995 associated with USWC's gain on the sale of several rural telephone exchanges in Utah. At page 9, the Commission states:

> The gain from the completed sales was booked in the years in which the sales were consummated, 1992 and 1993. No rate case is presently pending using 1992 or 1993 as a test year, nor is it likely that those years will become test years in future rate cases.

1 A. No. The Commission did not say the presumption did not exist. A careful
2 reading of the order's language shows the Commission did not address whether the
3 *presumption* exists or not; it was discussing whether the exchange sales were, in fact,
4 reflected in rates. The Committee misapplies the order's language. The Committee uses
5 language to support a ratemaking principle the language does not address.
6
7 Q. DO YOU AGREE WITH THE COMMITTEE'S ASSERTION THAT
8 WITHOUT AN EXCEPTION TO THE RULE THAT COSTS AND CREDITS ARE
9 PRESUMED TO BE RECOVERED, UTILITIES WOULD HAVE NO NEED TO
10 OBTAIN REGULATORY AUTHORITY TO DEFER OR RECOVER ANY
11 INCURRED COST?[58]
12 A. No. The Committee makes the incredible claim that because costs are *presumed*
13 to be recovered in rates and credits are *presumed* to be provided in rates, it follows that
14 utilities need never seek regulatory authority to recover changes in costs because the act
15 of recording such cost (or credit) would provide recovery of the costs. This claim is
16 preposterous. Equating the *presumption* of cost recovery with the *fact* of cost recovery is
17 specious. The widely known and understood fact that revenues authorized in rates almost

---

Without a rate case based on those test years, the sales have no direct effect on rates. [Docket No. 94-049-08, May 9, 1995 Report and Order, page 9]" Carver, p. 46, l. 5.

[58] "Further, if this premise of cost recovery were true without exception, utilities would have absolutely no need to obtain regulatory authority to defer or recover any incurred costs, as the act of recording such costs as current period expense would provide the needed recovery. Under such a theory, the Company would not have needed to seek Commission authority to defer and amortize one-time transition costs such as compensated absences, merit awards, medical & dental costs, or costs associated with FAS112 or FAS106." Carver, p. 16, l. 46.

never match costs and credits actually recorded on the utility's books does not invalidate the also widely accepted and applied presumption that costs are recovered and credits are provided in rates. The existence of the fact provides no justification for carving out an exception to the principle and applying that exception to pension asset.

Q. WHAT IS THE THIRD DEFECT IN COMMITTEE'S PROPOSED TEST FOR INCLUSION OF PENSION ASSET IN RATEBASE?

A. The third defect is that the Committee's proposed test is not supported by sound ratemaking authority. The Committee cites nothing in support of a requirement that elements of ratebase be proved by a definitive or comprehensive analysis of the amount of costs or credits ratepayers have actually paid or received through the ratemaking process. The Committee fails to explain what sound ratemaking principles make it necessary to reconcile the amount of actual pension costs recovered from ratepayers with the amounts actually contributed to the pension fund since the establishment of the pension plan.

USWC asked the Committee to explain why a higher burden of proof should apply to pension asset than to other elements of ratebase. The Committee declined to answer.

Q. **"Please describe and differentiate the burden the Committee believes a utility must meet to establish that investors have some claim to inclusion in the calculation of rate base the following items: gross investment in assets, depreciation reserves, deferred tax reserves, pension assets, the cost of unfunded postretirement benefits other than pensions. Provide all facts, data and authority that support your answer. To the extent the utility's burden for these various items differs from one another,**

please explain why the burdens differ and provide all facts, data, and authority supporting the answer."

A. "This question calls for a legal conclusion, which Mr. Carver is unable to provide. Nevertheless, Mr. Carver holds the opinion that a utility carries a substantial burden to demonstrate that the net amounts included in rate base are funded entirely by investors." [Committee response to sixth set of USWC's data requests, question 20, (emphasis added)]

Were the Commission to accept the standard of proof the Committee advocates for pension asset, then consistent and uniform application of that standard would require that ratepayers demonstrate that the Company had recovered in rates all of the accumulated depreciation and accumulated deferred tax expense that ratepayers would seek to have included in the calculation of net ratebase.

Q. WHAT IS THE FOURTH DEFECT IN COMMITTEE'S PROPOSED TEST FOR INCLUSION OF PENSION ASSET IN RATEBASE?

A. The fourth defect is that the Committee's proposal requires retroactive ratemaking. It seeks to determine the amount of a cost (debit) that is included in ratebase by determining whether ratepayers actually recovered the corresponding credits in rates. As the Committee's testimony explains, this is improper ratemaking.

> It is also generally recognized that to allow utilities to collect additional funds from ratepayers in the future simply because expenses were incurred which had not been specifically provided for in the determination of the existing base rates is considered retroactive ratemaking. While past expenses are frequently employed in quantifying or developing the prospective cost of service on which overall rates are based, it is improper to establish future rates at levels intentionally designed to recover past losses or under-recoveries due to a historical imbalance in the matching of rates and actual expenses. Carver, p. 47, l. 19.

In a bold display of incongruity, the Committee suggests in the immediately following paragraph of its testimony that USWC should bear the burden of proving what Mr. Carver's testimony had just explained is retroactive ratemaking.

> In spite of the realities of the ratemaking process, the Company has basically relied on an "as recorded" cost recovery theory to support an allegation that the prospective ratemaking process should be modified to recognize that past accounting practices have benefited ratepayers (i.e., negative pension costs) to the detriment of its investors. In my opinion, the Company must assume an even greater burden to demonstrate the existence of this alleged "harm" than has been presented in this proceeding. Carver, p. 48, l. 3.

Q. ARE OTHER ASPECTS OF THE COMMITTEE'S PENSION ASSET TESTIMONY MISLEADING?

A. Yes. One misleading argument is the false assertion that USWC's claim for inclusion of pension asset in ratebase is based on the notion that USWC was unjustly harmed or ratepayers were unduly benefited by the inclusion of pension credits in cost of service. [59] None of USWC's testimony or exhibits claims that inclusion of pension *credits* in the calculation of *cost of service* unduly or improperly benefited ratepayers or unjustly harmed USWC. That is because no showing of undue or improper ratepayer benefit from pension credits is required to justify inclusion of pension *asset* in *ratebase*,

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[59] "From a cost of service perspective, data provided by the Company for the period 1987 through 1996 does not appear to support the position that ratepayers have unduly benefitted from the pension credits from a cost of service perspective." Carver, p. 36, l. 2. "As discussed above, I do not believe that the Company has demonstrated that ratepayers have unduly benefitted by this accounting. For these reasons, the Commission should reject the Company's rate base request. Carver, p. 45, l. 21. "In order to establish that ratepayers have improperly benefited to the investors' detriment, it is my opinion that the Company would need to clearly demonstrate..." Carver, p. 38, l. 1. "Although the Company apparently believes that investors have somehow been "harmed" by ratepayers receiving the benefit of the pension credits, how can shareholders be harmed..." Carver, p. 45, l. 3. (emphasis added)

1 just as no showing of undue utility harm or undue ratepayer benefit from, for example,
2 depreciation or deferred tax expense is required to include accumulated depreciation or
3 accumulated deferred taxes in ratebase. The Committee's discussion of *undue* or
4 *improper* ratepayer benefit from pension credits is purely a red herring.
5
6 Q. ARE THERE OTHER EXAMPLES OF SELF-CONTRADICTORY OR
7 MISLEADING ARGUMENTS IN THE COMMITTEE'S PENSION ASSET
8 TESTIMONY?
9 A. Yes. In response to a Committee data request,[60] USWC prepared an analysis that
10 attempted to compute the amount of pension credits provided to ratepayers in rates. The
11 Committee devotes six pages of Mr. Carver's testimony to a critique of the original
12 version of that analysis.[61] Since the Committee filed its testimony, USWC has twice
13 revised its response to the original Committee data request. Attached as my exhibit 11 is
14 a spreadsheet that reflects USWC's last revision to its response to the Committee's data
15 request. Exhibit 12 is the written notes that explain the spreadsheet in exhibit 11.
16 The critique of USWC's original version of the analysis identifies three criticisms,
17 the third of which is that pension credits may not have been flowed through to ratepayers
18 because the Commission concluded the Company had over-earned during the late

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[60] Fourth set of data requests from the Committee of Consumer Services, request UTI-03.

[61] Carver, p. 38, l. 21 to p. 45, l. 7.

1980's.[62]

This criticism is squarely at odds with the Committee's testimony that the utility bears risk that rates will be inadequate and (by logical extension) ratepayers bear the risk that rates will be above the authorized level.[63] Setting rates so as to correct for past earnings that were above or below the authorized rate of return is retroactive ratemaking. Yet, the Committee incongruously argues that the Commission should consider USWC's past earnings in determining the amount of USWC's pension asset. The Committee's argument for consideration of achieved rates of return in past years should be disregarded.

Another example of a misleading argument is the unsubstantiated assertion that "pension credits appear to have been retained and used to increase earnings." Carver, p. 45, l. 5. No proper argument or data support this assertion. Nor could anything. By the Committee's own admission, it is not possible for anyone to demonstrate that pension credits have been retained and used to increase USWC's earnings for exactly the same

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[62] Carver, p. 44, l. 7 through l. 10. "Unless the Company can some how 'color code' the pension credits recorded during this three-plus year period, substantial questions arise as to whether the $11,996,085 of cumulative pension credits (i.e., pension asset balance) as of December 1990 had actually been flowed through to customers or whether those pension credits were fully retained by the Company as part of the $49 million of excess earnings retained for the benefit of USWC's investors." Carver, p. 44, l. 15.

[63] "Whenever a rate case is filed by a utility, it assumes a risk that the rates filed and ultimately approved will either be inadequate or excessive, no matter what test year approach or series of adjustments are proposed by the parties. * * * If utility rates are inadequate, then the available remedy is to timely file for a rate increase. Conversely, excessive utility rates normally require the filing of a complaint-style investigation by the commission staff or a consumer group, as utilities are rarely willing to voluntarily initiate base rate reductions." Carver, p. 47, l. 1

1 reason that it is not possible to demonstrate that pension credits have been provided to
2 ratepayers.[64]

3 The Committee attempts to back up its claim that pension credits did not benefit
4 ratepayers by relying on the Commission's statement that USWC over-earned in the late
5 1980's. Using over-earnings in past periods to deny recognition of a balance on a
6 utility's books is no more appropriate than removal of some portion of the depreciation
7 reserve on a utility's books in order to compensate it for past under-earnings. Both are
8 clearly examples of retroactive ratemaking.

9 But having asserted--in contravention of the rule against retroactive ratemaking--
10 that past over-earnings prevented pension credits from benefiting ratepayers, the
11 Committee relies on the assertion to support its position that pension asset should be
12 excluded from ratebase.[65] An argument that relies on a prohibited practice should be
13 disregarded.

14

15 Q. YOU MENTIONED AN ANALYSIS OF PENSION CREDITS IN USWC'S
16 RATES INCLUDED IN YOUR EXHIBITS 11 AND 12. WHAT DOES THE
17 ANALYSIS SHOW?

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[64] "I do not believe that it is possible to accurately quantify the accumulated net pension recoveries from or benefits provided to ratepayers." Carver, p. 35, l.. 10.

[65] "On the other hand if ratepayers are assumed to have substantially funded the Company's past pension contributions with USWC actually retaining the pension credits, then the inclusion of the Company's "pension asset" in rate base would improperly charge ratepayers a return on funds they have already provided to the Company and would result in a windfall to investors. As discussed above, I do not believe that the Company has demonstrated that ratepayers have unduly benefited by this accounting.

1 A. As the Committee and I have both argued, a reliable quantification of the amount
2 of any cost or credit included in rates is practically impossible to achieve. However, the
3 analysis is USWC's best effort in the event the Commission believes an analysis is
4 required. Based on reasonable and conservative assumptions, the analysis indicates that
5 net pension credit equal to at least the amount of the pension asset on USWC's books in
6 1997 was embedded in USWC's rates in effect January 1, 1987 through December 1,
7 1997.
8
9 Q. WHY DOES THE PENSION CREDIT ANALYSIS START WITH JANUARY
10 1, 1987?
11 A. 1987 was the first year in which USWC did not deposit funds into the Pension
12 Trust Fund. The critique in Mr. Carver's direct testimony criticizes USWC's original
13 pension credit analysis for failing to start with January 1, 1987.[66] After Mr. Carver filed
14 that direct testimony, USWC responded by twice revising the analysis and submitting the
15 revisions in supplemental responses to the Committee's data request. The final revised
16 analysis is my exhibit 11 and the notes thereto are exhibit 12.

For these reasons, the Commission should reject the Company's rate base request." Carver, p. 17, l. 17. (emphasis added)

[66] "Q. Why should the above analysis have started in 1987?
A. 1987 represents the year in which USWC adopted FAS87. The rate order immediately preceding the adoption of FAS87 appears to have been implemented with an effective date of January 1, 1986. [Report and Order dated December 31, 1995, Docket No. 85-049-02.] By starting with 1987 to compare annual FAS87 based pension credits and pension amounts included in the cost of service, it would be possible to examine how closely the cost of service allowance for this item has followed the recorded pension credits (or alleged ratepayer "benefits") the Company seeks to include in rate base." Carver, p. 40, l 18.

1

2 Q. THE COMMITTEE ALSO CRITICIZED USWC'S ORIGINAL ANALYSIS
3 FOR ITS HANDLING OF INTERIM RATE CHANGES.[67] HOW DOES USWC'S
4 REVISED ANALYSIS HANDLE INTERIM RATE CHANGES?

5 A. USWC'S revised analysis includes pension credits for which USWC could locate
6 documentation substantiating the amount of pension credit included in the calculation of
7 interim rates ordered effective June 22, 1990, in Docket No. 90-049-03 and 06. As note
8 D to my exhibit 12 explains in greater detail, USWC, in order to present a conservative
9 view of the probable amount of pension expense and credits included in rates since
10 January 1, 1987, revised its analysis to assume zero pension credits were included in rate
11 reductions ordered effective September 22, 1988 and January 1, 1989 in Docket 88-049-
12 07. As note C to my exhibit 12 explains, the revised analysis also includes zero pension
13 credits attributable to the Company's voluntary rate reduction effective December 22,
14 1987.

15

16 Q. OVERALL, WHAT DOES THE COMPANY'S REVISED ANALYSIS OF
17 PENSION CREDITS INCLUDED IN RATES SHOW?

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[67] "Q. In explaining why the Company's analysis provided in response to CCS Data Request No. UTI 4-3 does not accurately depict the amount of pension credits which may have been flowed through to ratepayers, you indicated that it appears that the orders relied upon by the Company for Docket Nos. 88-049-07 and 90-049-03/06 were associated with interim orders or negotiated agreements." Carver, p. 41, l. 19. "In summary, I do not believe that the Company has demonstrated that any specific test year pension credits associated with interim or stipulated proceedings have benefited ratepayers to the detriment of investors." Carver, p. 44, l. 4.

1 A. The revised analysis is reasonable because it uses conservative assumptions.
2 Nevertheless, its shows that an amount greater than the amount of pension asset on
3 USWC's books in 1997 probably was passed through to ratepayers in rates between the
4 beginning of 1987 (when pension asset first came into existence on USWC's books) and
5 the beginning of December, 1997.

6 The analysis does not attempt to analyze whether USWC's returns exceeded or
7 fell short of the rate authorized during this period because that is so clearly an exercise in
8 retroactive ratemaking and, therefore, unreasonable.

9 And, as I have explained, I believe in the first place that it is retroactive
10 ratemaking to rely on this kind of analysis, instead of the Company's books, to measure
11 the amount of pension asset that should be included in ratebase. In accordance with
12 sound ratemaking principles, the proper measure of pension asset--like all the other
13 elements of ratebase--is the amount properly recorded on the Company's books of
14 account.

15 That is why I did not attempt to include in my direct testimony and exhibits the
16 type of analysis the Committee suggests is required. Contrary to the Committee's
17 assertions,[68] a comprehensive analysis of the pension asset question does not require or
18 warrant one.

19

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[68] "Although [Mr. Grate's] Exhibit 4 does provide the Commission with a significant volume of additional information, I still do not believe the Company has adequately demonstrated that ratepayers have received substantial pension credit benefits to support the inclusion of the pension asset in rate base." Carver, p. 48, l. 15.

1 Q. WOULD YOU PLEASE SUMMARIZE YOUR CONCLUSIONS REGARDING
2 THE COMMITTEE'S PENSION ASSET TESTIMONY?
3 A. The Committee seeks to impose a burden of proof of the pension asset which, by
4 its own account, cannot be met. In support of that position, the Committee filed
5 testimony that is shot through with inconsistent application of ratemaking principles,
6 contradictions, misrepresentations, illogic, misleading arguments and red herrings. It is a
7 finely crafted exercise in obfuscation, should be read with great care, and disregarded.
8
9 Q. DO YOU AGREE WITH THE DIVISION'S ASSERTION THAT THE OVER-
10 FUNDING OF THE PENSION FUND IS DUE TO CUSTOMER OVERPAYMENTS
11 OF PENSION EXPENSE IN THE PAST?[69]
12 A. No. the U S WEST Pension Plan (Plan) is administered by an Employee's Benefit
13 Committee that is appointed by U S WEST and that is a named fiduciary to the Plan. The
14 *funds* of the Plan are held, invested and administered pursuant to a Trust Agreement
15 (Trust Fund).
16 I do not agree that USWC is responsible for overstating pension expense or over-
17 funding the Trust Fund. USWC has funded the Trust Fund in accordance with the
18 ERISA rules under the professional advice and guidance of pension fund actuaries. To
19 my knowledge, nobody in Utah (or anywhere else for that matter) has ever claimed that
20 USWC negligently or wrongfully over-funded the Trust Fund.

1 Since the beginning of 1974, federal income tax law has imposed penalties on
2 excess contributions to qualified pension plans through an excise tax. This penalty tax
3 has been in effect since ERISA was enacted. None of the U S WEST Pension Plans have
4 ever paid this penalty tax. It follows that under the federal tax laws enacted to support
5 and coordinate with ERISA, the Company has not made excess contributions to the Plan
6 and, therefore, cannot be said to have over-funded the Plan.

7 The reason there is a pension asset is not because USWC wrongfully or
8 negligently put too much money in the Trust Fund, but simply because the *accounting*
9 *rules* changed so that pension credits could be recognized. Prior to SFAS 87, there was
10 no possibility of pension credits and, hence no pension asset that anyone could claim was
11 an over-funding by the Company. With the advent of SFAS 87 *nothing* changed except
12 the bookkeeping entries. So it is unreasonable to say that the Company is to blame for
13 over-funding the Trust Fund.

14 Hence, I disagree with the Division's assertion that ratepayers overpaid pension
15 costs in the past. Ratepayers were charged the cost of funding the Trust Fund. I am not
16 aware that anybody in Utah ever challenged the amount of USWC's pension plan funding
17 in those years when the Company was paying funds into the Trust Fund. When only the
18 *accounting* rules (not the *funding* rules under ERISA) have changed, it is illogical to
19 conclude that the Company overcharged ratepayers for pension expense.

---

[69] The over funding of the pension fund is due to customer overpayments of pension expense in the past and the better than projected returns on the fund investments. Mower, p. 13, l. 14.

1

2 Q. DO YOU AGREE WITH THE DIVISION'S ASSERTION THAT THE
3 COMMISSION NEED NOT CONCERN ITSELF WITH THE LAST NINE YEARS OF
4 HISTORY CONCERNING THE PENSION CREDIT AND PENSION ASSET.[70]

5 A. No. I do not believe it is appropriate for the Commission to ignore what is on
6 USWC's books as a result of recording pension expense in compliance with the rules the
7 Commission adopted when it adopted Part 32--any more than it would be appropriate for
8 the Commission to simply ignore some amount of accumulated depreciation expense in
9 USWC's depreciation reserves. The Division's proposal to wipe the slate clean of
10 pension asset violates the Company's basic rights under the regulatory compact to be
11 given a reasonable opportunity to earn a reasonable return on the capital it provides. The
12 Division offers no reason why that right should be abridged.

13

14 Q. DO YOU AGREE WITH THE DIVISION WHEN IT IMPLIES THAT
15 RECOGNIZING THE PENSION ASSET IS RETROACTIVE RATEMAKING?[71]

16 A. The notion is preposterous. Including in ratebase the pension asset recorded on
17 USWC's books is no more an act of retroactive ratemaking than is including in ratebase
18 deferred taxes or accumulated depreciation on USWC's books.

---

70 "Q. IN SETTING POLICY FOR THE FUTURE, SHOULD THE COMMISSION BE CONCERNED ABOUT WHAT HAS HAPPENED IN THE PAST ON THIS ISSUE?
A. I believe that the Commission can start fresh on this issue in setting policy for the future. The Commission could be accused of retroactive rate making if it tries to make up for past losses or gains." Mower, p. 21, l. 8.

1

2 Q. IS THE DIVISION CORRECT IN ASSERTING THAT INCLUDING THE
3 PENSION ASSET IN RATEBASE WILL CAUSE RATEPAYERS TO PAY A
4 RETURN TO THE COMPANY ON THEIR OWN MONEY?[72]

5 A. No. As exhibit 4 to my direct testimony clearly explains in detail, the pension
6 asset is not the ratepayers' money. It is funded by investors' capital. The Division's
7 assertion to the contrary is incorrect. The Division offers no analysis or proof to support
8 its erroneous contention because there is none for it to offer. The Division's assertion
9 should be disregarded.

10

11 Q. IS IT PROPER FOR THE DIVISION TO ARGUE THAT ADOPTION OF SFAS
12 87 ACCOUNTING FOR PENSION EXPENSES CONTRIBUTED SIGNIFICANTLY
13 TO OVER EARNINGS OF THE COMPANY DURING THE 1987 TO 1989 PERIOD.[73]

14 A. No. Setting rates in this case based on alleged over-earnings in prior periods
15 would be a prohibited act of retroactive ratemaking. Using over-earnings in past periods
16 to deny recognition of a balance on a utility's books is no more appropriate than removal
17 of some portion of the deferred tax reserve on a utility's books in order to compensate it

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[71] *Id.*

[72] "If the pension asset is included in rate base, the customers will continue to pay the Company a return on the amount of money that was returned to them as a result of over payments to the pension fund. They will pay a return to the Company on their own money." Mower, p. 22, l. 19.

[73] "The Division found that the adoption of SFAS 87 accounting for pension expenses contributed significantly to over earnings of the Company during the 1987 to 1989 period." Mower, p. 24, l. 1.

1 for past under-earnings. Both are clearly examples of retroactive ratemaking. It follows
2 that it was improper for the Division to have raised this argument and it would not be
3 proper for the Commission to consider it. The Division's argument should be
4 disregarded.
5
6 Q. THE DIVISION ARGUES THE PENSION ASSET SHOULD BE EXCLUDED
7 FROM RATEBASE BECAUSE THE DIVISION CONCLUDED THE COMPANY
8 WAS NOT FORTHRIGHT IN 1987 AND 1988 IN DEALING WITH FAS 87.[74] IS
9 THIS AN APPROPRIATE REASON TO EXCLUDE THE PENSION ASSET FROM
10 RATEBASE?
11 A. No. In Docket No. 88-049-18, the Division claims the Company had a burden,
12 that it did not meet, to inform the Division about a decline in pension expense and that
13 the Company concealed its effect. The Division argues its claim in that case justifies
14 excluding pension asset from ratebase in this case, apparently as a means of punishing the
15 Company for former wrongdoing the Division alleges.
16 The Division's testimony fails to disclose that reflected in pages 106 through 109
17 of the transcript of deposition in Docket No. 88-049-18 taken of Mr. Huntsman May 27,
18 1997 (which was prior to the Division's distribution of its testimony in this docket) the
19 Division clarified the following:

[74] "Sixth, the Division concluded from its MCI Remand investigation that the Company was not forthright in its dealings with regulators during the early years when SFAS 87 was adopted by the Company." Mower, p. 25, l. 11. See also Mower, p. 23, l. 18 through p. 24, l. 7.

1. It makes no claim the Company had an obligation to highlight the decline in pension expense.
2. It makes no claim that any failure to highlight the decline in pension expense was actuated by bad faith or ill intent.
3. It makes no claim of misconduct for any failure to highlight the decline in pension expense.
4. It makes no claim the Company made any attempt to hide or disguise the decline in pension expense.
5. The decline in pension expense was included in earnings forecasts that the Company provided the Division and upon which the Division relied to make a determination not to start a rate case.

Given the fact that the Commission has yet to rule on the Division's claim and given that the Division's clarification of its claim is so significant, the Division should withdraw this portion of its testimony and, if it does not, the record will show, through cross examination of the Division, that its Pre-filed testimony on this issue should not be believed.

Q. IS THE DIVISION RIGHT TO ASSERT THAT PENSION ASSET SHOULD BE EXCLUDED FROM RATEBASE BECAUSE USWC SHOULD HAVE RAISED THE ISSUE TEN YEARS AGO?[75]

A. No. I am aware of no rule of law or equity that suggests the Company is estopped from seeking proper ratemaking treatment of an issue simply because it did not do so at its earliest opportunity. Under that theory, many of the new ratemaking adjustments the Division proposed in USWC's last rate case would have been rejected.

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[75] "[T]his whole issue has been in controversy for the past 10 years. The Company is just now making a detailed analysis. This is something it should have done 10 years ago." Mower, p. 24, l. 21.

1

2 Q. WHAT IS YOUR CONCLUSION CONCERNING THE DIVISION'S

3 PROPOSED TREATMENT OF USWC'S PENSION ASSET?

4 A. The Division's proposal should be rejected because each of the six points upon

5 which it relies is fatally defective.

6 1. The assertion that return of the pension credits through lower rates was simply a

7 return of ratepayers' money is factually incorrect. Pension asset is funded by

8 investors and this fact is widely recognized.

9 2. Denying USWC pension asset in ratebase simply for failure to pursue the issue sooner

10 violates the Company's rights of due process and is manifestly inequitable.

11 3. Consideration of whether USWC earned in excess of its authorized rate of return

12 violates sound ratemaking principles prohibiting retroactive ratemaking.

13 4. Ignoring past actions, as the Division suggests, is inequitable and violates sound

14 ratemaking principles entitling utilities to a reasonable opportunity to earn a

15 reasonable return on invested capital.

16 5. The assertion that inclusion of pension asset in ratebase would allow USWC to

17 "recoup any past losses" is factually incorrect as is the assertion that inclusion of

18 pension asset in ratebase is retroactive ratemaking.

19 6. The assertion the Company was not forthright in its dealings with regulators during

20 the early years when SFAS 87 was adopted by the Company is unsubstantiated and

21 contrary to the evidence the Division gave in deposition.

1 Q. DO YOU HAVE ANY COMMENTS REGARDING THE COMPANY'S
2 PROVISION OF EVIDENCE ON THE QUESTION OF PENSION ASSET?
3 A. Yes. The Division suggests the Company has been "delinquent in providing the
4 Commission with information."[76] I believe the Division's allegation of delinquency is
5 both harsh and unjustly discriminatory. It is harsh because it assumes the Company
6 should know how to meet a burden of proof--a comprehensive analysis--which the
7 Commission did not identify until its April 15, 1993 order in Docket 92-049-05 and
8 which, to my knowledge, is not a standard of proof commonly recognized or understood
9 in American jurisprudence. It is unjustly discriminatory because it puts all the blame on
10 the Company. The Division has some responsibility in this issue to provide the
11 Commission with objective and comprehensive information.[77] The Division's testimony
12 fails to provide information that is either. The Division's recommendation to exclude
13 pension asset from ratebase should be rejected.
14
15 Q. IF THE COMMISSION EXCLUDES PENSION ASSET FROM USWC'S
16 RATEBASE DO YOU AGREE WITH THE PROPOSALS OF THE DIVISION[78] AND

---

[76] Mower, p. 25, lines 8 and 9.

[77] UCA 54-4a-6.

[78] "The Division recommends that the Commission remove the effects of the pension credits from rate making. That is, to follow the proposal of the Company in Docket No. 95-049-05 where the Company proposed to eliminate the deferred taxes from rate base if the pension asset is not placed in rate base and eliminate the pension credits as a reduction of expenses." Mower, p. 24, l. 9 (emphasis added)

1 COMMITTEE[79] TO ALSO REMOVE FROM RATEBASE THE ACCUMULATED
2 DEFERRED TAXES RESULTING FROM RECORDATION OF THE PENSION
3 ASSET?
4 A. Yes. Removal from ratebase of accumulated deferred taxes created by the
5 pension asset is a proper application of the ratemaking principle of comprehensive inter-
6 period income tax allocation.

[79] "If the Company's proforma pension asset adjustment is to be excluded from rate base, I believe that the companion deferred income tax reserves should be similarly reversed." Carver, p. 30, l. 12.

1 **PENSION ASSET (A-19)**

2 Q. DO YOU HAVE CORRECTIONS OF A **TYPOGRAPHICAL** NATURE TO

3 EXHIBIT 4 OF YOUR DIRECT TESTIMONY?

4 A. Yes. Following are those corrections:

5 • Page 5, fourth line of text from the bottom, the reference to "Docket 88-049-08"
6 should be to "Docket 88-049-18."
7 • Page 31, beginning of the second full paragraph, the first word should be "It" instead
8 of "I."
9 • Page 44, about four lines of testimony from the bottom, the reference to "Colorado
10 Docket No. 90S-S44T" should be to "Colorado Docket No. 90S-544T."
11
12 Q. DO YOU HAVE CORRECTIONS TO EXHIBIT 4 OF YOUR DIRECT

13 TESTIMONY OF A **SUBSTANTIVE** NATURE?

14 A. Yes. Following are corrections to **substantive** errors on my Exhibit 4.

15 • On page 26, the following question and answer appear.

16 Q. IS THE PENSION ASSET SHRINKING OR GROWING?
17 A. The pension asset has not materially grown nor shrunk in the past 3 years.
18 The Company does not expect that it will grow or shrink appreciably in the next 5
19 years.
20
21 The response to that question requires updating. Attached as my CONFIDENTIAL

22 exhibit 15 is updating information pertinent to this question.

23 • On page 45, the following statement appears at the top of the page:

24 The Colorado Public Utility Commission staff agreed with this inclusion
25 of the pension asset in rate base and, therefore, did not file testimony on it. So in
26 Colorado, the pension asset is now included in the calculation of rate base through
27 the cash working capital calculation.
28
29 Based on information I received since I prepared my exhibit 4, the correct information

30 is as follows:

In rate case Docket No. 90S-544T, USWC included a pension asset as part of its Cash Working Capital (CWC) requirement in the amount of $13.6 million. Following negotiations and a stipulation in the case, this asset was removed from the CWC calculation and included as a rate base item. The fact is that the pension asset in ratebase was not verbally mentioned in any of the signed stipulations or the Colorado Commission's decisions.

- On page 48, the following statement appears at the top of the page:

> In 1994, in Docket 93-9 the Iowa Commission changed its position and ordered amortization of the pension credit into cost of service over seven years. However, the issue of the pension asset was not raised in that docket and so the Iowa commission has not been asked to rule on it.

Based on information I received since I prepared my exhibit 4, it should have been written as follows:

> In 1994, in Docket No. RPU-93-9 (TF-94-343) the Iowa Commission changed its position and ordered amortization of the pension credit into cost of service over seven years. In regards to the pension asset, Page 6 of the Commission's order states,
>
> > "The rate base will not be adjusted. It is based on a 13-month average, and the record contains no persuasive evidence that an adjustment is necessary. <u>As the FAS 87 negative pension expense is amortized, future 13-month average rate bases will reflect the change</u>." (emphasis added)

PLANT UNDER CONSTRUCTION (A-20)

Q. HAVE YOU CHANGED THE CALCULATION OF PLANT UNDER CONSTRUCTION (A-20)?

A. Yes. As explained in USWC's response to Committee Data Request Set No. 05, UTI-003, USWC should have computed taxes on the allowance for funds used during construction (AFUDC). Adjustment A-20 in my rebuttal testimony now reflects a proper

CA-T-7
DOCKET NO. 94-0298

DIRECT TESTIMONY AND EXHIBITS

OF

STEVEN C. CARVER

ON BEHALF OF

THE DIVISION OF CONSUMER ADVOCACY

SUBJECT: **Pension Plan Asset, State Capital Goods Excise Tax Credit, Deferred Income Tax Reserve Adjustment, Hurricane Iniki, Process Re-Engineering, Labor Expense, Employee Benefits, Incentive Compensation, Productivity/Inflation Forecast, Shared Asset Study, Alakea Restack - Lease Savings, Revenue Taxes, Interest Synchronization**

pages as well as any related accounting schedules located in Exhibit CA-801:

Topic	Page	Exh. CA-801 Schedules
Pension Plan Asset	4-27	B-7
State Capital Goods Excise Tax Credit	27-29	B-8
Deferred Income Tax Reserve Adjustment . . .	29-30	B-9
Hurricane Iniki	30-46	B-10,B-11,C-20
Process Re-Engineering	47-65	C-21
Labor Expense	66-79	C-9
Employee Benefits	80	C-10
Incentive Compensation	81-91	C-27
Productivity/Inflation Forecast	92-107	C-18
Shared Asset Study	107-113	C-19
Alakea Restack - Lease Savings	113-120	C-28
Revenue Taxes	121-122	C-29
Interest Synchronization	122-128	C-30

I. PENSION PLAN ASSET

Q. PLEASE DESCRIBE CA SCHEDULE B-7.

A. CA Schedule B-7 (Exhibit CA-801) represents the reversal of the Company's proposal to include a pension asset in rate base. Referring to HTC Workpaper P27, the Company proposed to included, $139,394,076 in rate base, before nonregulated allocation and jurisdictional separation. Referring to Company Exhibit HTC-400 and Workpaper P32, the projected intrastate pension asset amount is $85,415,342.

1 Q. IF THE PROJECTED INTRASTATE PENSION ASSET IS $85,415,342, WHY DOES
2 CA SCHEDULE B-7 REMOVE ONLY $47,917,000 FROM RATE BASE?
3 A. The amount shown on Exhibit HTC-400 as the Company rate base allowance does not
4 recognize, or is shown gross of, the related deferred income tax reserves. While the
5 deferred income tax reserves are not included within or netted against the Company's
6 specific pension asset rate base adjustment, these amounts were nevertheless reflected
7 in rate base through the deferred income tax reserves employed as a rate base offset
8 as quantified in HTC Workpaper P29. If the Company's proforma pension asset
9 adjustment is to be excluded from rate base, then the companion deferred income tax
10 reserves should be similarly reversed.
11
12 Q. WHAT IS THE BASIS FOR THE COMPANY'S CLAIM THAT THE PENSION
13 ASSET SHOULD BE INCLUDED IN RATE BASE?
14 A. Mr. McCormick [HTC T-4] discusses the rationale supporting the Company's request
15 for rate base inclusion of the pension asset. The following excerpt from pages 94
16 through 96 of Mr. McCormick's direct testimony summarizes the Company's basis for
17 seeking rate base inclusion:

18 Incorporated into the rate base is the impact of the pension asset created
19 by the adoption of Statement of Financial Accounting Standard No. 87,
20 "Employers' Accounting for Pensions". Significant earnings by the
21 Company's pension plan assets and the plan's funding status have made
22 it possible to reduce pension costs. In fact, <u>these conditions have</u>
23 <u>resulted in a credit to the cost of service in each year since 1987</u>. The
24 pension asset represents the accumulation of pension credits, or negative
25 pension costs, booked since 1987. These negative pension costs are a

> direct reduction to expense and reduce rate base through the capitalization of benefit cost.
>
> . . .
>
> The recording of the negative pension cost has an impact on the income statement and balance sheet and <u>both must be taken into consideration when evaluating this item for ratemaking treatment</u>. Since the income statement impact was included in cost of service, the balance sheet impact must also be included in rate base. The regulatory treatment of the pension asset, deferred taxes associated with the pension asset and the pension credit must be consistent.
> [HTC T-4, p. 94-96; Emphasis added]

As indicated in the response to CA-IR-931, it is GTE Hawaiian Tel's view that the pension asset represents investor supplied funds. In essence, the Company has proposed rate base inclusion of the pension asset on the basis that ratepayers have benefited through a lower cost of service since the adoption of Statement of Financial Accounting Standard No. 87 ("FAS87") in 1987. Accordingly, the Company believes that the pension asset should be included in rate base as ratepayer compensation for the use of investor funds.

Q. HAVE YOU SIMILARLY PROPOSED TO REVERSE THE NEGATIVE PENSION EXPENSE INCLUDED IN THE 1995 TEST YEAR FORECAST?

A. No. While I generally concur with the Company regarding the "consistent" treatment of these items, I do not believe that ratepayers have yet received the benefits alleged by the Company. For that reason, the rate base allowance proposed by GTE Hawaiian Tel is inappropriate. Nevertheless, the recognition of the negative pension expense for

1995 is appropriately recognized in quantifying cost of service for purposes of the current proceeding.

Q. COULD YOU PLEASE DESCRIBE THE EVENTS OR CIRCUMSTANCES WHICH GAVE RISE TO THE RECORDING OF A PENSION ASSET?

A. Yes. In December 1985, the Financial Accounting Standards Board (FASB) issued FAS87 concerning employers' accounting for pension costs. Although issued in 1985, FAS87 was first effective for fiscal years beginning after December 15, 1986, which GTE Hawaiian Tel adopted for financial accounting purposes effective January 1, 1987, subsequent to the rate order issued in the Company's last rate case [Decision and Order No. 8711 dated April 4, 1986, Docket No. 5114].

Prior to FAS87, the amount of pension costs distributed to expense and capital accounts was equal to the level of contributions actually made to the pension fund. It is only after the adoption of FAS87 that pension costs expensed/capitalized and pension contributions diverge. According to information supplied by the Company, GTE Hawaiian Tel's actual pension funding has totaled only $1.5 million during the period 1987 through 1995 [CA-IR-941]. During this same time frame, GTE Hawaiian Tel has actually recorded a pension asset associated with the negative pension costs of approximately $141 million (on a total Hawaii basis) in compliance with FAS87 [CA-IR-929].

1 Q. SINCE THE ADOPTION OF FAS87, HAS THE COMPANY CONTINUED TO
2 RECORD POSITIVE PENSION EXPENSE IN ITS ACCOUNTING RECORDS?
3 A. No. Beginning with the adoption of FAS87 in 1987, the Company began recording
4 negative pension expense (a pension credit) instead of positive pension expense. It is
5 several years' accumulation of this pension credit which the Company represents has
6 resulted in the pension asset which it now seeks to include in rate base.
7
8 Q. COULD YOU BRIEFLY OUTLINE THE RATE BASE CONCEPT?
9 A. Yes. Rate base is commonly viewed as being comprised of net utility asset
10 investments used to provide service to ratepayers, which have not yet been recovered
11 from ratepayers. When utility investors provide the necessary funds to support these
12 company investments, those amounts are generally included in rate base to allow the
13 investors a return to which they are entitled. Similarly, funds advanced, reimbursed,
14 or otherwise paid for by ratepayers are properly excludable from rate base.
15 With respect to the pension asset, the Company has represented that its
16 shareholders have effectively "invested" the cumulative amount by which pension
17 funding has historically exceeded the recorded pension expense, thereby justifying the
18 inclusion of those amounts in rate base.

Q. HOW HAS NEGATIVE PENSION EXPENSE RESULTED IN A PENSION ASSET?

A. Pension expense is normally thought of as being positive (or an added cost) in determining a utility's total expenses. However, as implied by the reference, negative pension expense is actually recorded as a credit or a decrease to total expenses. Under traditional accounting, the pension credit may reduce both expense and capital accounts, thereby resulting in a corresponding debit or an increase to a pension asset account.

Q. SINCE THE ADOPTION OF FAS87, HAS THE COMPANY CONTINUED TO MAKE CONTRIBUTIONS TO THE PENSION FUND?

A. No. In 1987, HTC's pension plan became over-funded in that the funding limitations of the Internal Revenue Code restricted the Company from making any further tax deductible contributions to the pension plan. In 1987, the Company funded $1.5 million to the pension plan, but has made no contributions since that time. [See the response to CA-IR-941.]

1 Q. DO YOU AGREE WITH THE COMPANY THAT ITS INVESTORS HAVE
2 REALIZED ADDITIONAL CASH OUTLAYS AS A RESULT OF RECORDING
3 PENSION CREDITS, WHICH ARE LESS THAN ITS CONTRIBUTIONS TO THE
4 PENSION FUND?
5 A. No. The Company seeks to improperly combine the ratemaking treatment of pension
6 costs with its historical accounting for this item as evidence that ratepayers have
7 benefited to the detriment of its shareholders. If contributions to the pension fund (i.e.,
8 only $1.5 million of contributions since 1987) exceed the "negative" pension expense
9 recorded, then the difference is typically recognized as a "prepayment". The
10 assumption relied upon by the Company is that this "prepayment" must have been
11 funded by its investors, since ratepayers benefit from negative pension costs, while
12 investors are unable to withdraw comparable amounts from the pension fund to recover
13 the amount of negative pension costs flowed to ratepayers.
14
15 Q. IN THE EARLIER QUOTE FROM HTC T-4, MR. MCCORMICK INDICATED
16 THAT THE EXISTENCE OF A PENSION CREDIT HAS RESULTED IN A
17 CREDIT TO THE COST OF SERVICE IN EACH YEAR SINCE 1987. DO YOU
18 AGREE?
19 A. No. For that to be the case, negative pension costs would have to have been included
20 in the cost of service and flowed to customers each year when recorded by the
21 Company. In effect, GTE Hawaiian Tel would have to demonstrate that the benefits

1 resulting from the recording of the pension credits, which total about $140 million
2 from 1987 through the 1995 forecast test year, have been flowed through to its
3 ratepayers on an annual basis.
4
5 Q. DO YOU BELIEVE THAT RATEPAYERS HAVE RECEIVED THE BENEFIT OF
6 THESE PENSION CREDITS MERELY AS A RESULT OF THE COMPANY
7 RECORDING THE NEGATIVE PENSION COSTS FOR ACCOUNTING
8 PURPOSES?
9 A. No, I disagree with that premise for several reasons. First, I do not believe that it is
10 possible to accurately quantify the accumulated net pension recoveries from or benefits
11 provided to ratepayers. In order to prepare such a calculation, I believe that it would
12 be necessary to reconcile the amount of actual pension costs recovered from ratepayers
13 with the amounts actually contributed to the pension fund since the establishment of
14 the pension plan. Such a quantification would be significantly complicated by the fact
15 that the level of pension costs charged to expense over the years does not necessarily
16 equate to the amount of pension costs recovered from ratepayers (i.e., included in cost
17 of service) or contributed to the pension plan.
18 Second, the Company's pension plan and pension accounting have existed for
19 decades. By focusing solely on the accounting entries underlying the pension asset
20 balance recorded since 1987, the Company has excluded from consideration a
21 substantial portion of the history which underlies the pension fund, pension accounting

1 and cost of service. Assuming that net recoveries from ratepayers can be accurately
2 quantified, the Company inappropriately relied solely on its accounting records for
3 purposes of determining the amount includable in rate base. From a cost of service
4 perspective, the use of data beginning in 1987 would indicate that ratepayers have
5 provided more pension costs through rates than have been contributed to the pension
6 plan. Such a calculation leads to further questions as to whether rate base should be
7 reduced, rather than increased as proposed by the Company.

8 Third, GTE Hawaiian Tel has sought to include the entire pension asset balance
9 in rate base even though the Company has not demonstrated that 100% of these
10 benefits have actually been flowed through to its ratepayers. The cost of service on
11 which existing rates are based was determined prior to the Company's adoption of
12 FAS87. Unless the Company can somehow demonstrate that the negative pension
13 costs have been flowed through to its customers, GTE Hawaiian Tel's rate base
14 proposal will charge ratepayers with a return on funds they never received -- thereby,
15 unnecessarily benefitting Company investors.

16

17 Q. WHY DID YOU CONCLUDE THAT THE COMPANY INAPPROPRIATELY
18 RELIED SOLELY ON ITS ACCOUNTING RECORDS FOR PURPOSES OF
19 DETERMINING THE RATE BASE ALLOWANCE FOR PENSION CREDITS?

20 A. In my opinion, the ratemaking treatment of pension credits, or negative pension
21 expense, did not commence in 1987 with the adoption of the FAS87. Furthermore, the

1 ratemaking treatment of pension credits and is not fully reflected in the Company's
2 accounting records. Starting the calculation in 1987 represents only a small part of the
3 overall history of pension accounting and regulatory recovery. In many situations, it
4 may be possible to clearly point to an occurrence or event and establish whether the
5 ratepayer or investor has paid for or benefited from a particular transaction. However,
6 in this case, it is my opinion that the overall evidence does not support the Company's
7 contention that shareholders have advanced any "excess" pension funds.
8
9 Q. SINCE FAS87 WAS ADOPTED BY THE COMPANY IN 1987, WHY WOULD
10 ANY INFORMATION PRIOR TO 1987 BE OF INTEREST?
11 A. According to HTC T-4 (p.94), negative pension costs ". . . have resulted in a credit to
12 cost of service in each year since 1987." For ratepayers to have benefited from the
13 recording of negative pension costs, it is my opinion that the Company would have to
14 allege that costs are recovered from ratepayers as expensed and that the ratepayers have
15 benefited to the detriment of its shareholders. I do not accept, nor do I believe that
16 the Company can sustain such a representation. The question of cost recovery with
17 regard to negative pension expense has a substantial historical context which, if
18 ignored, could lead to inappropriate conclusions.
19 Prior to FAS87, the amount of pension costs charged to expense/capital
20 accounts and contributed to the pension fund were equal. Subsequent to FAS87, the
21 Company has recorded negative pension costs and made no fund contributions. In

1 order to establish whether ratepayers have inappropriately benefited to the shareholders
2 detriment, neither the act of recording costs nor making contributions necessarily
3 establish the pension cost amount that ratepayers have "invested" in or "benefited" from
4 through the cost of service.

5 Pension funding is basically determined from a comparison of pension plan
6 assets with the expected pension liability. The pension plan assets are comprised of
7 prior contributions to the fund plus the actual returns received on the plan assets. Once
8 the plan assets exceed the expected liability and meet certain provisions of the Internal
9 Revenue Code, the plan is considered overfunded and no further tax deductible
10 contributions can be made. However, the plan assets have accumulated over a long
11 period of time, not just the last few years.

12 Since the adoption of FAS87, the Company has been recording a negative
13 pension expense primarily due to the pension fund's favorable investment experience
14 [CA-IR-943]. The annual returns on pension plan assets have ranged from 16.13% to
15 30.44% in seven of the eleven years since 1985 [CA-IR-944]. It is these "stellar"
16 returns that have primarily contributed to the negative pension expense being recorded
17 by the Company since 1987.

18 In order to establish that ratepayers have improperly benefited to the investors
19 detriment, it is my opinion that the Company would need to clearly demonstrate that
20 the amount of funds collected from ratepayers through the cost of service were fully
21 contributed to the pension plan and that the Company was truly out-of-pocket for

1 additional cash outlays, over and above those collections. However, I do not believe
2 that such a situation applies with regard to this issue.
3
4 Q. HOW DOES THIS POSITION DIFFER FROM THE COMPANY'S PRESENTATION
5 ON THIS ISSUE?
6 A. Although similar to the Company's argument, there are two major differences. First,
7 GTE Hawaiian Tel has not sufficiently compared and evaluated the pension cost and
8 pension funding issue. Second, the Company has effectively assumed that the mere
9 recording of negative pension costs equates to ratepayer benefits. While this theory
10 has some limited application in situations where alternative forms of regulation are
11 based on a sharing of earnings above predetermined thresholds, it does not apply to
12 GTE Hawaiian Tel's operations in Hawaii. The Company has simply not demonstrated
13 that the overall cumulative amount of pension costs recovered from ratepayers through
14 the cost of service has, over the long-term, been fully contributed to the pension plan.
15 To "prove" investor harm, a longer term analysis comparing rate recoveries to pension
16 fund contributions would be required.

1 Q. IN YOUR OPINION, HAS THE COMPANY TAKEN THE POSITION WITH
2 REGARD TO THESE PENSION CREDITS THAT SHAREHOLDERS HAVE BEEN
3 HARMED BECAUSE RATEPAYERS HAVE BENEFITED AT THEIR EXPENSE?
4 A. Yes. In response to CA-IR-41, the Company describes its pension credit theory of the
5 use of shareholder funds and cash outlays to the benefit of ratepayers. However, I do
6 not believe that ratepayers have thus far received any substantial benefit which would
7 justify the inclusion of a significant pension asset in rate base.
8
9 Q. HOW DOES THE AMOUNT OF PENSION COSTS INCLUDED IN COST OF
10 SERVICE COMPARE TO THE ACTUAL PENSION CONTRIBUTIONS AND
11 PENSION COST CREDITS RECORDED BY THE COMPANY?
12 A. While the Company seems to argue that costs or benefits are recovered from or
13 provided to ratepayers when the expense is booked in order to support including the
14 pension asset in rate base [see HTC T-4, p.94], the amount of pension costs actually
15 recorded by the Company varies significantly from both the actual amount of pension
16 contributions and the level of pension costs included in cost of service. While the
17 following estimated comparison starts in 1987 with the adoption of FAS87, it
18 illustrates the potentially extreme differences in these pension cost amounts. [Note:
19 The following pension costs are shown in millions, before nonregulated allocation and
20 jurisdictional separation. Further, the cost of service amounts do not recognize the
21 effect of revenue growth on customer collections.]

Year	Amount Funded	Recorded Cost	Cost of Service	
1987	$1.5	($15.7)	$15.1	#
1988	0.0	(9.7)	15.1	#
1989	0.0	(8.3)	14.8	@
1990	0.0	(8.3)	14.4	@
1991	0.0	(12.1)	14.4	@
1992	0.0	(15.6)	14.4	@
1993	0.0	(26.5)	14.4	@
1994	0.0	(18.6)	14.4	@
1995	0.0	(26.3)	14.4	@
Total	$1.5	($141.1)	$131.4	

See response to CA-IR-39.
@ See response to CA-IR-935 (TRA reduction effective 4/1/89).

Unless the Company can somehow demonstrate that pension credits arising between rate proceedings are flowed through to the benefit of ratepayers, this comparison indicates that the rates in effect during the period 1987-1995 have resulted in pension costs being charged to ratepayers in the approximate amount of $131.4 million, excluding the effect of access line or revenue growth. This does not support the Company's contention that ratepayers have benefited by some $140 million of pension credits at shareholder expense.

1 Q. WHY DID YOU START THE ABOVE COMPARISON IN 1987?

2 A. The year 1987 represents the year in which GTE Hawaiian Tel adopted FAS87. The
3 rate order immediately preceding the adoption of FAS87 was implemented in April
4 1986 [Decision and Order No. 8711, Docket No. 5114]. By starting with 1987 to
5 compare annual FAS87 based pension costs, actual funding levels and cost of service
6 amounts, it is possible to examine how closely the cost of service allowance for this
7 item has followed the amount of pension cost "benefits" the Company seeks to include
8 in rate base. As shown by this comparison, the amounts (i.e., funded pension, recorded
9 pension cost, pension cost recovered from ratepayers) do not "track" at all.
10 Considering access line and revenue growth during this period would make the
11 disparity between the amounts recovered from ratepayers and the recorded costs and
12 funding levels even greater.

13

14 Q. IN PREPARING THIS COMPARISON, HOW DID YOU DETERMINE THE
15 AMOUNT OF PENSION COSTS INCLUDED IN THE COST OF SERVICE?

16 A. The responses to CA-IR-39 and CA-IR-935 provided the amount of pension costs
17 included in cost of service beginning with the rate case immediately preceding the
18 Company's adoption of FAS87. The following table shows how the pension costs

identified therein were weighted for purposes of the above comparison:

Year	Order No.	Docket No.	Order Date	Pension Cost	Prorate
1987..1988	8711	5114	4/4/86	$15,094,000	100%
1989	8711	5114	4/4/86	$15,094,000	100%
	10269	5921	7/12/89	($697,000)	50%
1990..1995	8711	5114	4/4/86	$15,094,000	100%
	10269	5921	7/12/89	($697,000)	100%

Q. HAVE YOU ASKED FOR THE COMPANY'S OPINION AS TO WHETHER RATEPAYERS PARTICIPATE IN REDUCED EXPENSES ARISING BETWEEN RATE PROCEEDINGS?

A. Yes. Interestingly enough, the Company and I appear to concur that ratepayers do not participate in cost reductions which occur between rate case proceedings. The following information was supplied in partial response to CA-IR-938:

> Rate changes do not occur each and every time expenses are reduced or increased. Rates are based on the test year concept, which is representative of a going forward level of financial results. For this purpose, the test year is normalized, restated and in some cases such as in Hawaii, projected. As such, the rate making process generally results in ratepayer participation in changes of expenses periodically, once every few years, and not continuously each time expenses (or revenues) change.
> [CA-IR-938(b)]

However, in the same response, the Company also indicated that ratepayers still receive full benefit of the reduced expenses "because the Company is filing for <u>less</u>

rate relief <u>later</u> rather than sooner." [See response to CA-IR-938(a). Original emphasis.]

In addition, the Company also discussed the question of cost recovery in response to CA-IR-939, as follows:

> The rate case process sets rates to recover costs based on a test year level which is representative of what operations will be in the near term future. As time passes, after rates are re-calibrated in a rate proceeding, operating expenses as well as revenues and investments will increase or decrease due to a variety of reasons (inflation, growth in the business, changes in the business, etc.). If during these periods, the Company earns at or near its' authorized return levels, it can be said that its' costs have been recovered.
> [CA-IR-939]

Q. HOW MUCH SOONER AND IN WHAT INCREASED AMOUNT WOULD THE COMPANY HAVE SOUGHT RATE RELIEF, ABSENT THE NEGATIVE PENSION CREDIT RESULTING FROM FAS87?

A. While I do not know the answer to that question, the following response to CA-IR-937 indicates to me that neither does the Company:

> a. The credit pension expenses reduce the Company's expenses (and capitalized cost), thereby improving the Company's earned rates of return for reporting purposes (all else being equal). This increase in earnings influences the timing and magnitude of the Company's need for rate relief. Without this increase in earnings the Company would have filed for rate relief sooner (the Company's rates of return have declined over the past decade, but would show a greater decline if the pension cost credit were excluded). Without this increase in earnings the Company would have requested more relief than otherwise (the Company's rates of return would have even been lower without the expense credit).

b. Conceivably the Company could have filed for rate relief as early as 1987, the year the pension accrual, or pension cost, became negative. However, filing for rate relief is not solely dependent on pension cost. Ultimately, it is the overall financial condition of the Company, among other factors, that determines the decision for requesting rate relief.

c. In the absence of the pension cost credit, the Company's filing would have been higher by, at a minimum, the grossed up intrastate amount of the pension expense credit booked during that test year ($17.4M) and the accumulated rate base impact associated with the capitalized pension cost, grossed up for taxes and uncollectibles.
[CA-IR-937]

I agree that utilities determine the need to seek rate relief based on the overall financial condition of the company. However, it is the Company who has alleged that ratepayers have enjoyed a reduced cost of service since the implementation of FAS87. Since 1987, ratepayers have paid through rates approximately $131.4 million for pension costs while the Company has recorded pension credits of $141.4, and funded only $1.5 million. [Note: All amounts are before nonregulated allocation and jurisdictional separation.]

Although the Company posits that shareholders have somehow been "harmed" by its decision to not seek higher rates earlier, GTE Hawaiian Tel has also indicated that the existence of the pension credit improved the Company's earned rates of return which benefits shareholders. How can shareholders be harmed when the retained pension credits increased earnings? In my opinion, the Company has not presented sufficient justification to support its request to include the pension asset in rate base.

Q. WHAT HAS BEEN THE LEVEL OF RETURNS EARNED BY THE COMPANY SINCE 1987?

A. The Company has provided its Intrastate Separated Results of Operations Reports filed with the Commission for the years 1987 through 1994. Without reviewing or evaluating such data for purposes of normalizing the recorded results (e.g., adjusting the results to account for out of period items or differences between accounting recognition and ratemaking inclusion), these achieved returns are summarized below:

Year	Intrastate ROI
1987	9.75%
1988	9.96%
1989	7.46%
1990	8.86%
1991	9.23%
1992	7.36%
1993	6.41%
1994	4.23%

[CA-IR-35 and CA-IR-936]

Although I am certain that the Company would have preferred much higher returns for any number of these years, the fact remains that GTE Hawaiian Tel has continued to operate successfully in Hawaii throughout this period. By definition, these returns represent the residual earnings remaining after all operating expenses are deducted from operating revenues. Consequently, all recorded expenses have been

1 recovered. otherwise the Company would have reported operating losses. There are
2 no guarantees of specified earnings levels, merely an opportunity to earn.
3
4 Q. DO YOU BELIEVE THAT ALL ELEMENTS OF THE COST OF SERVICE
5 INCLUDED IN PAST RATES SHOULD BE RECONCILED WITH CURRENT
6 COST LEVELS TO DETERMINE PROSPECTIVE RATE TREATMENT FOR EACH
7 ITEM?
8 A. No. As a matter of ratemaking policy, I do not recommend that the Commission rely
9 solely on or otherwise reconcile past decisions in establishing cost of service for future
10 periods. However, it is my opinion that the above comparison is indeed relevant in
11 demonstrating the Company's failure to meet its burden to establish that investors have
12 some claim to inclusion of the pension asset in rate base.
13 If the funded status and related earnings of the pension plan were created solely
14 with shareholder moneys, I could understand the Company's concerns on this issue.
15 On the other hand if ratepayers are assumed to have substantially funded the
16 Company's past pension contributions, then the inclusion of the Company's "pension
17 asset" in rate base would improperly charge ratepayers a return on funds they have
18 already provided to the Company and would result in a windfall to shareholders. As
19 shown by the above comparison, the Company's ratepayers appear to have provided
20 substantial pension costs since 1987. For these reasons, the Commission should reject
21 the Company's rate base request.

1 Q. DO YOU AGREE THAT THE COMPANY RECOVERS COSTS FROM
2 RATEPAYERS WHEN EXPENSED AND IN THE AMOUNT EXPENSED ON ITS
3 BOOKS?
4 A. No, not necessarily. It is true that a common simplifying assumption in the ratemaking
5 process is that costs are recovered as expensed. However, this assumption is not
6 globally applied, even by the Company. If this statement were true without exception,
7 then utilities would have absolutely no need to obtain regulatory authority to defer or
8 recover any incurred cost, as the act of recording such costs as incurred would provide
9 the needed recovery. Under such a theory, the Company would not have needed to
10 seek Commission authority to defer the Iniki-related expenses which are included in
11 the regulatory asset GTE Hawaiian Tel has included in revenue requirement in this
12 proceeding.
13
14 Q. HOW DOES THIS THEORY OF "AS RECORDED" COST RECOVERY RELATE
15 TO THE TRADITIONAL RATEMAKING PROCESS?
16 A. Whenever a rate case is filed by a utility, it assumes a risk that the rates filed and
17 ultimately approved will either be inadequate or excessive, no matter what test year
18 approach or series of adjustments are proposed by the parties. Generally, utility rates
19 are authorized based on a known and measurable test year cost of service regardless
20 of the actual level of costs which might be incurred during the rate-effective period.
21 If utility rates are inadequate, then the available remedy is to timely file for a rate

1 increase. Conversely, excessive utility rates normally require the filing of a
2 complaint-style investigation by the commission staff or a consumer group, as utilities
3 are rarely willing to voluntarily initiate base rate reductions.

4 It is widely accepted that cost based utility rates, once established by a
5 ratemaking body, are deemed to be just and reasonable until such time as a moving
6 party carries its burden of proof to establish that said rates are no longer just and
7 reasonable. Costs incurred by the utility are often presumed to be covered by existing
8 rates, regardless of whether the cost of service study underlying said rates included a
9 specific allowance for that unique cost. Otherwise, the result could entail an endless
10 reconciliation process comparing each element of actual costs during the rate-effective
11 period with the cost of service details underlying the preceding rate case order.
12 However, this presumption does not extend to the actual adjustment of utility rates
13 charged ratepayers between rate cases to track specific cost levels, such as negative
14 pension expense or represcription changes.

15 It is also generally recognized that to allow utilities to collect additional funds
16 from ratepayers in the future simply because expenses were incurred which had not
17 been specifically provided for in the determination of the existing base rates is
18 considered retroactive ratemaking. While past expenses are frequently employed in
19 quantifying or developing the prospective cost of service on which overall rates are
20 based, it is improper to establish future rates at levels intentionally designed to recover

1 past losses or under-recoveries due to a historical imbalance in the matching of rates
2 and actual expenses.
3 In spite of the realities of the ratemaking process, the Company has basically
4 relied on an "as recorded" or "we could have filed earlier" cost recovery theory to
5 support an allegation that the prospective ratemaking process should be modified to
6 recognize that past accounting practices have benefited ratepayers (i.e., negative
7 pension costs) to the detriment of its investors. In my opinion, the Company must
8 assume an even greater burden to demonstrate the existence of this alleged "harm" than
9 has been presented in this proceeding.
10
11 Q. EARLIER, YOU CITED A PORTION OF MR. MCCORMICK'S DIRECT
12 TESTIMONY [HTC T-4, P.94] IN WHICH HE STATES THAT "THESE NEGATIVE
13 PENSION COSTS ARE A DIRECT REDUCTION TO EXPENSE AND REDUCE
14 RATE BASE THROUGH THE CAPITALIZATION OF BENEFIT COST." HAVE
15 YOU ATTEMPTED TO INVESTIGATE THE EXTENT TO WHICH PENSION
16 CREDITS MAY BE BEEN CREDITED TO PLANT INVESTMENT AND
17 RESULTED IN A REDUCED RATE BASE?
18 A. Yes. However, I have been unsuccessful in obtaining any meaningful capital credit
19 information. In response to CA-IR-930 and CA-IR-932, the Company was unable to
20 supply the amount of pension costs credited to plant since 1987. Instead, GTE
21 Hawaiian Tel provided an estimate of such credits using the 1994 benefits distribution

as a surrogate factor. I do not believe that such information results in quality data which the Commission should rely upon for ratemaking purposes because of the questionable value of the resulting amount.

In summary, the Commission should deny GTE Hawaiian Tel's proposal to include the pension asset in rate base for the reasons previously discussed.

II. STATE CAPITAL GOODS EXCISE TAX CREDIT

Q. PLEASE DESCRIBE CA SCHEDULE B-8.

A. CA Schedule B-8 (see Exhibit CA-801) reflects a rate base reduction for the cost free capital attributable to the State Capital Goods Excise Tax Credit.

Q. WHAT IS THE STATE CAPITAL GOODS EXCISE TAX CREDIT?

A. The State Capital Goods Excise Tax Credit (or "State ITC") was enacted in 1987 through H.R.S. § 235-110.7. Generally, the State ITC was designed to track the qualification rules of the Federal Investment Tax Credit, which has been amended and repealed from time to time. A four percent credit is earned on qualifying property placed in service by Hawaii businesses. For accounting and ratemaking purposes, the State ITC is deferred and amortized over a period of years.

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FAS87 PENSION ASSET

1 Q. What is the purpose of ACC Staff Adjustment B-3?
2 A. Staff Adjustment No. B-3 represents the elimination of the Company's proposal to include a
3 pension asset in rate base. Referring to USWC Adjustment P-04, the Company has proposed
4 to include a pension asset of $66,221,000 in rate base for intrastate ratemaking purposes.

5 Q. If USWC has proposed to include a $66.2 million pension asset in rate base, why does Staff
6 Adjustment No. B-3 remove only $42.3 million from rate base?
7 A. The amount shown on USWC Adjustment P-04 as the Company rate base allowance does not
8 recognize, or is shown gross of, the related deferred income tax reserves. While the deferred
9 income tax reserves are not included within, or netted against, the Company's specific pension
10 asset rate base adjustment, these amounts were nevertheless reflected in the quantification of
1 rate base through the deferred income tax reserves employed as a rate base offset. If the
12 Company's proforma pension asset adjustment is to be excluded from rate base, I believe that
13 the companion deferred income tax reserves should be similarly reversed.

14 **Pension Cost Accounting**
15 Q. Could you please describe the events or circumstances which gave rise to the recording of a
16 pension asset?
17 A. Yes. In December 1985, the Financial Accounting Standards Board (FASB) issued FAS87
18 concerning employers' accounting for pension costs. Although issued in 1985, FAS87 was first
19 effective for fiscal years beginning after December 15, 1986, which the Company adopted for
20 financial accounting purposes effective January 1, 1987.

21 Prior to FAS87, the amount of pension costs distributed to expense and capital accounts was
22 equal to the level of contributions actually made to the pension fund. It was only after the

1 adoption of FAS87 that pension costs expensed/capitalized and pension contributions began
2 to diverge.

3 Q. Since the adoption of FAS87, has the company continued to record positive pension expense
4 in its accounting records?
5 A. No. Beginning with the adoption of FAS87 in 1987, the Company began recording negative
6 pension costs (a pension credit) instead of positive pension costs. It is several years'
7 accumulation of this pension "credit" which has resulted in the pension asset the Company
8 now seeks to include in rate base.

9 Q. How have negative pension costs resulted in a pension asset?
10 A. Pension costs are normally thought of as being positive (or an added cost) in determining a
11 company's total cost of providing service. However, as implied by the reference, negative
pension costs are actually recorded as a credit or a decrease to the appropriate expense and
13 capital accounts, thereby resulting in a corresponding debit (or increase) to the pension asset
14 account.

15 On a total State basis, the following table summarizes the annual pension credits to expense
16 and capital accounts recorded by USWC since the adoption of FAS87:

Total Arizona – Net Pension Credits
(000's)

	Qualified Pension Credit				
Year	Expense	Capital	Total	NonQualified Expense	Net Pension Credits
1987	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1988	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1989	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1990	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1991	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1992	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1993	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1994	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1995	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1996	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1997	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1998	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
1999	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total	($101,004)	($12,525)	($113,529)	$9,152	($104,377)

Sources: USWC confidential responses to UTI 20-5 and UTI 46-13S1.

Q. Why do the net pension credits shown in the above table not tie to the $66.2 million pension asset that the Company has proposed to include in rate?

A. The above table reflects annual pension credits on a total Arizona basis, including the cost of the Company's non-qualified retirement plan. One major difference between the amounts included in this table (Total State) and the amount the Company has proposed to include in rate

through to its ratepayers. Unless the Company can somehow demonstrate that the negative pension costs have unquestionably been flowed through to its customers, USWC's rate base proposal would charge ratepayers with a return on funds they never received -- thereby, unnecessarily benefitting Company investors.

Q. Why did you conclude that the Company inappropriately relied on its accounting records for purposes of determining the rate base allowance for pension credits?

A. In my opinion, the ratemaking treatment of pension credits, or negative pension costs, did not commence in 1987 with the adoption of the FAS87 and is not fully reflected in the Company's accounting records. In many situations, it may be possible to clearly point to an occurrence or event and establish whether ratepayers or investors have paid for or benefitted from a particular transaction. However, in this case, it is my opinion that the overall evidence does not support the Company's contention that investors have "contributed the cash required to fund this reduction in revenue requirements generated by the pension credits" in the amount of the $66.2 million (intrastate) included in rate base.

For ratepayers to have benefitted from the recording of negative pension costs, it is my opinion that the Company would have to allege that costs are recovered from ratepayers as recorded or that the ratepayers have benefitted through reduced revenue requirements to the detriment of its investors. I do not accept, nor do I believe that the Company can sustain either representation. The question of cost recovery with regard to negative pension expense has a substantial historical context which, if ignored, could lead to inappropriate conclusions.

Q. Please explain.

A. Prior to FAS87, the amount of pension costs charged to expense/capital accounts and contributed to the pension fund were equal. Subsequent to FAS87, the Company has recorded negative pension costs and made no further contributions to its pension fund. In order to

1 establish whether ratepayers have inappropriately benefitted to the investors detriment, neither
2 the act of recording costs nor making contributions necessarily establish the pension cost
3 amount that ratepayers have "invested" in or "benefitted" from through the cost of service.

4 Pension funding is basically determined from a comparison of pension plan assets with the
5 expected pension liability. The pension plan assets are comprised of prior contributions to the
6 fund plus the actual returns received on the plan assets. Once the plan assets exceed the
7 expected liability and meet certain provisions of the Internal Revenue Code, the plan is
8 considered overfunded and no further tax deductible contributions can be made. However, the
9 plan assets have accumulated over a long period of time, not just the last few years.

10 Since the adoption of FAS87, the Company has recorded negative pension costs for all plan
11 years, but one, primarily due to the pension fund's favorable investment experience. The
12 annual returns on pension plan assets have ranged from about 13% to over 23% in nine (9) of
13 the thirteen (13) years since the adoption of FAS87 [USWC responses to Data Request Nos.
14 UTI 20-7 and UTI 47-5]. It is these "stellar" returns that have primarily contributed to the
15 negative pension expense being recorded by the Company, in accordance with FAS87, since
16 1987.

17 In order to establish that ratepayers have benefitted to the investors' detriment, it is my opinion
18 that the Company would need to clearly demonstrate that the amount of pension credits flowed
19 through to USWC's Arizona intrastate customers equal or exceed the cumulative pension asset
20 the Company has proposed to include in rate base. However, I do not believe that such a
21 situation can be demonstrated with regard to this issue.

22 Q. How does this position differ from the Company's presentation on this issue?

1 A. Although the Company's allegation of ratepayer benefits will be discussed later in more detail,
2 there are two major differences. First, USWC's filed evidence does not address or evaluate
3 the value of pension credit benefits that customers are alleged to have received. Second, it
4 appears that the Company has effectively assumed that the recording of negative pension costs
5 equates to ratepayer benefits. While this theory has some limited application in situations
6 where alternative forms of regulation are based on a sharing of earnings above predetermined
7 thresholds, I do not believe that this process would apply to the Company's Arizona operations.

8 Q. In your opinion, has the Company taken the position with regard to these pension credits that
9 ratepayers have benefitted at the expense of its investors?
10 A. Yes. However, I do not believe that ratepayers have thus far received substantial benefits that
11 would justify the inclusion of a significant pension asset in rate base.

12 Q. Since the Company's adoption of FAS87 in 1987, how does the amount of pension costs
13 included in cost of service compare to the pension credits recorded by the Company?
14 A. While the Company seems to argue that costs or benefits are recovered from or provided to
15 ratepayers when the expense is booked in order to support including the pension asset in rate
16 base, the amount of pension costs actually recorded by the Company varies significantly from
17 year to year, as previously shown. Although I do not believe that it is possible to accurately
18 quantify the accumulated net pension recoveries from or benefits provided to ratepayers, I have
19 prepared a series of calculations which attempt to estimate the level of pension credit benefits
20 ratepayers might have received since the adoption of FAS87.

21 Relying on USWC responses to Staff/UTI discovery in Docket E-1051-93-183 (Staff Data
22 Request Nos. 191, 386-388) and Data Request No. UTI 20-5 in the pending proceeding, the
23 following table was assembled to show the amount of pension credits allegedly flowed through

to ratepayers in each proceeding immediately preceding or following USWC's adoption of FAS87.

Arizona Intrastate – Net Pension Expense
(000's)

ACC Docket	Order Date		Ratemaking Pension Expense
84-100	1/10/86		$12,200
88-146	3/01/89	(a)	(600)
91-004	7/15/91	(a)	(9,900)
93-183	1/03/95		(9,000)

Sources: USWC response to UTI 20-5.
Note (a): Resolved by negotiated settlement.

On its face, this table would seem to indicate that the rates in effect since early1989 have resulted in pension credits being flowed through to ratepayers. However, after further review and analysis, I do not believe that this information demonstrates that ratepayers have materially benefitted from the pension credits.

Q. Please explain.

A. Appendix SCC-1 represents an analysis of the amount of pension expense explicitly included in the Company's rates, starting with the rate case immediately preceding the adoption of FAS87. Recognizing that two of the rate cases before this Commission in the late 1980's - early 1990's (i.e., E-1051-88-146 and E-1051-91-004) were resolved by negotiated settlement, I have estimated that ratepayers may reasonably be assumed to have provided USWC with cumulative positive pension expense up to $64.8 million, as compared to the negative $66.2 million of pension credits that the Company proposes to include in rate base as a pension asset.

1 Q. How does Appendix SCC-1 quantify the amount of pension cost included in the cost of service
2 resulting from Dockets E-1051-88-146 and E-1051-91-004?
3 A. Because these two Dockets were stipulated settlements, Appendix SCC-1 assumes that the
4 amount of pension cost included in the preceding litigated rate case continued in full force and
5 effect.

6 Q. Why was the analysis presented by Appendix SCC-1 start in 1986?
7 A. Calendar year 1987 represents the year in which USWC adopted FAS87. The rate order
8 immediately preceding the adoption of FAS87 was implemented by order dated January 10,
9 1986. [Decision No. 54843, dated December 31, 1995, Docket No. E-1051-84-100.] By
10 starting the analysis in 1986, it is possible to capture the transition to FAS87 and recognize that
11 customer rates did not change immediately upon adoption of this accounting change.
12 Consequently, it would be possible to examine how closely the cost of service allowance for
3 this item has followed the recorded pension credits (or alleged ratepayer "benefits") the
14 Company seeks to include in rate base.

15 Since the test year in Docket No. E-1051-84-100 was calendar year 1984 and the next rate case
16 was Docket No. E-1051-84-100 with an order issued March 1, 1989 adopting a negotiated
17 resolution, any rates in effect during the intervening period (i.e., calendar year 1986, 1987,
18 1988 and through February 1989) would not have reflected any pension credits associated with
19 FAS87. Consequently, any positive pension costs included in the development of the rates
20 effective during this period would tend to offset or mitigate the net amount of pension credits
21 included in the cost of service since the FAS87 adoption.

22 Q. In describing Appendix SCC-1, you indicated that two of the rate cases (i.e., E-1051-88-146
23 and E-1051-91-004) were resolved by negotiated settlement. Why do you believe that this is
24 important?

A. In assessing the amount of pension credits flowed through to ratepayers, it is imperative that only those orders which specifically address the various components of cost of service be considered.

- Docket No. E-1051-88-146 represented an earnings complaint proceeding that was styled as a Commission examination of the Company's rates and charges. By Decision 56471, the Commission rescinded its earlier order finding for an interim rate reduction of $33.4 million and adopted a negotiated settlement offered by the parties to implement a permanent rate reduction.

- In Docket No. E-1051-91-004, the parties again presented the Commission with a negotiated settlement agreement, which contained the following provision:

> 23. Except as otherwise expressly provided in this Agreement, all the provisions of this Agreement have been negotiated for Settlement purposes only, and no party to this Agreement has approved, accepted, agreed to or otherwise consented to any method for determining return on equity or investment, rate base, cost of service, or any allocation method or rate design formula underlying any of the rates, charges, terms and conditions set forth in this Agreement.
> [Settlement Agreement appended to Decision 57462]

Settlement agreements are typically non-specific, by design. The negotiation process entails any number of compromises by each participant in the interest of reaching a resolution or common ground that each party finds acceptable. Such settlements leave the Commission unaware of important details, instead only presenting the final outcome as set forth in the agreement. By its very nature, a settlement agreement reflects a compromise that can be valued in various ways, not necessarily reflecting the filed positions of any particular party. As a result, I am unable to conclude what amount of any pension credits were embedded within the test years used in either of these proceedings or whether any credits were partially or fully flowed through to benefit ratepayers, to the detriment of the Company's investors.

1 Q. If the assumption were to be made that it was reasonable to go behind these negotiated
2 settlements in order to identify the amount of pension costs included in rates, have you
3 attempted to estimate that effect on the calculations set forth in Appendix SCC-1?
4 A. Yes. Appendix SCC-2 attempts that very calculation. If the Commission were to conclude
5 that it was proper to step behind the explicit language and basic underpinnings of settlement
6 agreements, Appendix SCC-2 would indicate that ratepayers may have participated in
7 cumulative negative pension expense of approximately $42 million. If the Commission were
8 to endorse this premise, the amount of the net pension asset (net of related deferred income tax
9 reserves) included in rate base should not exceed 63% of the amounts set forth on ACC Staff
10 Adjustment B-3, supported as follows:

Description	Ref.	Pension Asset
Cumulative Pension Credits Included In Rates	**(a)**	$42,029
USWC's Proposed Pension Asset	**(b)**	66,221
Ratepayer Percentage of Pension Credits		63.47%

Note (a): Appendix SCC-2.
Note (b): USWC Adjustment P-04.

11 Q. Do you believe that all elements of the cost of service included in past rates should be
12 reconciled with current cost levels to determine prospective rate treatment for each item?
13 A. No. As a matter of ratemaking policy, I do not recommend that the Commission rely solely
14 on or otherwise reconcile past decisions in establishing cost of service for future periods.
15 However, it is my opinion that the consideration of past Commission rate orders are indeed
16 relevant in demonstrating the Company's failure to meet its burden to establish that investors
17 have some claim to inclusion of the pension asset in rate base.

If the funded status and related earnings of the pension plan were created solely with investor funds, I could understand the Company's concerns on this issue. On the other hand if ratepayers are assumed to have substantially funded the Company's past pension contributions with USWC retaining a material portion of the pension credits, then the inclusion of the Company's "pension asset" in rate base would improperly charge ratepayers a return on funds retained by the Company and would result in a windfall to investors. As discussed above, I do not believe that the Company has demonstrated that ratepayers have benefitted from the pension credits to the detriment of investors. For these reasons, the Commission should reject the Company's rate base request.

Company Position

Q. What is the basis for the Company's claim that the pension asset should be included in rate base?

A. At pages 15-16 of his initial direct testimony filed in this proceeding, Company witness Redding briefly discusses USWC's rationale for including the pension asset in rate base. Mr. Redding generally refers to the test year pension credits as a "non-cash" item, which should be treated consistently with the pension asset. The following excerpt appears in this portion of Mr. Redding's testimony, further explaining why the Company has proposed that the pension asset be included in rate base:

> The customer will benefit from the pension credit in the form of reduced revenue requirements, similar to the past when they benefited [sic] from pension credits the Company recorded in the late 80's and early 90's. Pension credits, which are a non-cash item, reduce the revenue requirement. However, this reduction is a cash item. By this I mean that the revenues collected from customers are lower because of the inclusion of the pension credit in the development of the revenue requirement. Since the earnings of the pension plan cannot be withdrawn, the Company's investors have to contribute the cash required to fund this reduction in revenue requirements generated by the pension credits. The equitable balance between the Company's customers and its investors is to flow through the pension credits to the

> customers and to allow the accumulated pension asset resulting from the pension credits to earn a return as part of the rate base. This reimburses the investors. [Redding Direct, pages 15-16]

As indicated above, it is the Company's view that the pension asset represents investor supplied funds. In essence, the Company has proposed rate base inclusion of the pension asset on the basis that ratepayers have benefitted through a lower cost of service because the pension credits reduced revenue requirements and because the Company recorded pension credits in the late 80's and 90's. Accordingly, the Company has proposed that the recorded pension asset should be included in rate base as ratepayer compensation for the use of investor funds.

Q. Do you agree with the Company that its investors have contributed the additional cash required to "fund" reduced revenue requirements generated by the pension credits?

A. No. Other than providing a general reference to customers benefitting from "reduced revenue requirements, similar to the past when they benefited [sic] from pension credits the Company recorded in the late 80's and early 90's," Mr. Redding does not provide any definitive or comprehensive analysis of the amount of pension credits ratepayers are alleged to have actually received through the ratemaking process. Instead, I believe that the Company seeks to generally and improperly combine its historical accounting for pension costs with presumed ratemaking effects in an attempt to convince the Commission that USWC's customers have benefitted to the detriment of its investors.

Q. Have you made any further inquiries into the details underlying the Company's position on this issue?

A. Yes. Data Request No. UTI 20-4 was submitted specifically to obtain additional information regarding the Company's position on ratepayer benefits. The following passage was provided in partial response to this discovery request:

> Mr. Redding and Mr. Grate subscribe to the generally accepted ratemaking principle that rates based on sound cost-of-service ratemaking principles will, nonetheless, likely be either inadequate or excessive because revenues actually collected during a rate effective period will likely be, respectively, either less than costs actually incurred or more than costs actually incurred. If utility rates are inadequate, then the available remedy is for the utility to file for a rate increase. Conversely, excessive utility rates may require the filing of a complaint-style investigation by the regulatory agency, its staff or another party. Ratepayers benefit from the recordation of expense credits because they reduce costs actually incurred which, in turn, cause a revenue requirement reduction that helps to either obviate the need for a rate increase filing by the utility or to support a complaint of excessive rates by a regulator or other party.
> [Data Request No. UTI 20-4(a)]

Based on this theory, the Company then postulates that the potential for rate increase filings or complaint reductions effectively serves as the balance to ensure that ratepayers benefit from cost reductions (i.e., pension credits) as they arise. The response to Data Request No. UTI 20-4 further discusses this point, as follows:

> For the reason stated in response to subpart "a," Mr. Redding and Mr. Grate believe that ratepayers receive the benefit of reduced expenses (i.e. pension credits) regardless of whether a specific year's reduced expenses are used to establish cost of service in ratemaking proceeding. Specifically, reduced expenses reduce revenue requirement and reduced revenue requirement benefits ratepayers.
> [Data Request No. UTI 20-4(b)]

Using this logic, the Company essentially concludes that the pension asset must have been funded by its investors – since ratepayers have benefitted from negative pension costs, while investors were required to absorb the resulting short-fall in earnings.

Q. Do you agree with this premise?

A. I understand the Company's position, but respectfully disagree. Anticipating the Company's position on this subject, subpart (d) to Data Request No. UTI 20-4 asked whether it would then follow that ratepayers immediately incur or fund increases in expense that are recorded by the

Company, regardless of the extent to which those amounts are explicitly recognized in the ratemaking process. Not too surprisingly, the Company's response, reproduced below, declined to symmetrically apply its theory of ratepayer benefit to also apply to funding costs increases:

> No. Ratepayers do not immediately incur or fund increases or decreases in expenses (or revenues or ratebase for that matter) because changes in the elements of revenue and cost that comprise revenue requirement do not reflect themselves in rate immediately. See the response to part "a."
>
> So long as the parties to the ratemaking process are vigilant, however, all changes in expenses, revenues and ratebase are recognized in the cost-of-service ratemaking process because once known and measurable, they can be included in a measurement of revenue requirement. From that measurement, the parties to the ratemaking process can determine whether filing a rate case or complaint is justified.
> [Data Request No. UTI 20-4(d)]

It is true that a common simplifying assumption in the ratemaking process is that costs are recovered as expensed. If this premise of cost recovery was globally applied and true without exception, utilities would have absolutely no need to obtain regulatory authority to defer or seek explicit recovery of any incurred cost, as the act of recording such costs as a current period expense would provide the needed recovery. Under such a theory, the Company would not have needed to seek Commission authority in prior dockets to defer and amortize one-time transition costs (e.g., compensated absences, merit awards, medical & dental costs) or request the explicit recovery of costs associated with FAS112 or FAS106. Even the Company's response to Data Request No. UTI 20-4(c) recognizes the limitations of this argument and seems to undermine any symmetry to its position.

Nevertheless, I do not believe that one can simply assume that an ever vigilant ratemaking process will ensure that "all changes in expenses, revenues and ratebase are recognized in the cost-of-service ratemaking process." All parties including the Commission have competing

demands for limited resources. As interested as regulatory commissions are in ensuring that regulated rates are no higher or lower than necessary, it has been my experience that regulatory agencies are often hesitant to commit the required resources to pursue and process formal earnings complaint cases – particularly in the context of the likely discovery challenges surrounding a complaint investigation and the obligation to process other filed applications within more typically stringent time frames.

Q. In your opinion, how does this theory of "as recorded" cost recovery relate to the traditional ratemaking process?

A. Whenever a rate case is filed by a utility, it assumes a risk that the rates filed and ultimately approved will either be inadequate or excessive, no matter what test year approach or series of adjustments are proposed by the parties. Generally, utility rates are authorized based on a known and measurable test year cost of service regardless of the actual level of costs which might be incurred during the rate-effective period. If utility rates are inadequate, then the available remedy is to timely file for a rate increase. Conversely, excessive utility rates normally require the filing of a complaint-style investigation by the commission staff or a consumer group, as utilities are rarely willing to voluntarily initiate base rate reductions.

It is widely accepted that cost based utility rates, once established by a ratemaking body, are deemed to be just and reasonable until such time as a moving party carries its burden of proof to establish that said rates are no longer just and reasonable. Costs incurred by the utility are often presumed to be covered by existing rates, regardless of whether the cost of service study underlying said rates included a specific allowance for that unique cost. Otherwise, the result could entail an endless reconciliation process comparing each element of actual costs during the rate-effective period with the cost of service details underlying the preceding rate case order. However, this presumption does not extend to the actual adjustment of utility rates

charged ratepayers between rate cases to track specific cost levels, such as negative pension expense or represcription changes.

It is also generally recognized that to allow utilities to collect additional funds from ratepayers in the future simply because expenses were incurred which had not been specifically provided for in the determination of the existing base rates is considered retroactive ratemaking. While past expenses are frequently employed in quantifying or developing the prospective cost of service on which overall rates are based, it is improper to establish future rates at levels intentionally designed to recover past losses or under-recoveries due to historical imbalances in the matching of rates and actual expenses.

In spite of the realities of the ratemaking process, the Company has basically relied on an "as recorded" cost recovery theory to support an allegation that the prospective ratemaking process should be modified to recognize that past accounting practices have allegedly benefitted ratepayers (i.e., negative pension costs) to the detriment of its investors. In my opinion, the Company must assume an even greater burden to demonstrate the existence of the alleged "investor contribution" than has been presented in this proceeding.

Q. Do you have any further comments on this issue?

A. Yes. In Docket No. E-1051-93-183, the Commission was presented with a very similar ratemaking issue associated with the pension asset and FAS87 pension credits. The ACC adopted the Staff's recommendation in that rate case. The following excerpt appears at page 5 of the Decision No. 58927:

> We concur with the Company that the overfunded pension assets which were contributed by shareholders should be included in rate base. It would be unfair to permit ratepayers to benefit by reduced expenses resulting from capital invested by Company shareholders. However, at the same time it would be equally unfair to include the overfunded pension assets in rate base if ratepayers have previously

> provided those funds to the Company. Although the Company has presented evidence in an effort to demonstrate that since 1986 the shareholders have provided the monies which resulted in the current overfunded pensions asset, Staff's analysis has raised significant questions as to the accuracy of the Company's claim. Even if we were convinced of the accuracy of the Company's number for the 1976-1993 period, we would still not be able to conclude that shareholders have advanced excess pension amounts from the inception of the pension account. Based on all the above, we find the Company has not presented sufficient evidence to clearly demonstrate that its shareholders have advanced the excess pension amounts. Accordingly, we must deny the Company's request to include the net amount of overfunding of $36,213,000 in rate base.
> [Arizona Docket No. E-1051-93-183, Decision No. 58927, page 5]

In spite of this language, the Company declined to directly address this issue in direct testimony.

Conclusion

Q. Please summarize your recommendation on this issue.

A. I do not believe that the Company has adequately demonstrated that ratepayers have received substantial pension credit benefits to support the inclusion of the entire pension asset in rate base. Although some pension credits have been returned to ratepayers through a reduction in revenue requirements, it is my opinion that the amount of any such benefits are relatively limited in comparison to the pension asset balance. For the reasons previously set forth, the Commission should deny the Company's request to include a pension asset in rate base and similarly remove the related deferred income tax reserves from rate base.

Q. Does this conclude your direct testimony?

A. Yes.

U S WEST COMMUNICATIONS, INC.
DOCKET NO. T-1051B-99-105
Analysis of Pension Costs Included in Revenue Requirement

				Arizona Intrastate (000's)	
Year	ACC Docket	Order Date	Assumed Months in Effect	Ratemaking Pension Allowance	Estimated Pension Credit in Rates
1986	84-100	1/10/86	12	$12,200	$12,200
1987	84-100		12	12,200	12,200
1988	84-100		12	12,200	12,200
1989	84-100		2	12,200	2,033
	84-100 (a)	3/01/89	10	12,200	10,167
1990	84-100 (a)		12	12,200	12,200
1991	84-100 (a)		6.5	12,200	6,608
	84-100 (b)	7/15/91	5.5	12,200	5,592
1992	84-100 (b)		12	12,200	12,200
1993	84-100 (b)		12	12,200	12,200
1994	84-100 (b)		12	12,200	12,200
1995	93-183	1/03/95	12	(9,000)	(9,000)
1996	93-183		12	(9,000)	(9,000)
1997	93-183		12	(9,000)	(9,000)
1998	93-183		12	(9,000)	(9,000)
1999	93-183		12	(9,000)	(9,000)
					$64,800

Note (a): The pension costs from Docket 84-100 are assumed to continue due to the settlement in Docket 88-146.

Note (b): The pension costs from Docket 84-100 are assumed to continue due to the settlement in Docket 91-004.

If negotiated settlements are treated as resolutions without any finding on specific costs and/or recoveries, a reasoned assumption would look to the results from the previous most recently litigated case to determine the amount of pension expense.

Appendix SCC-2

U S WEST COMMUNICATIONS, INC.
DOCKET NO. T-1051B-99-105
Analysis of Pension Costs Included in Revenue Requirement

				Arizona Intrastate (000's)	
Year	ACC Docket	Order Date	Assumed Months in Effect	Ratemaking Pension Allowance	Estimated Pension Credit in Rates
1986	84-100	1/10/86	12	$12,200	$12,200
1987	84-100		12	12,200	12,200
1988	84-100		12	12,200	12,200
1989	84-100		2	12,200	2,033
	88-146 (a)	3/01/89	10	(600)	(500)
1990	88-146		12	(600)	(600)
1991	88-146		6.5	(600)	(325)
	91-004 (a)	7/15/91	5.5	(9,900)	(4,538)
1992	91-004		12	(9,900)	(9,900)
1993	91-004		12	(9,900)	(9,900)
1994	91-004		12	(9,900)	(9,900)
1995	93-183	1/03/95	12	(9,000)	(9,000)
1996	93-183		12	(9,000)	(9,000)
1997	93-183		12	(9,000)	(9,000)
1998	93-183		12	(9,000)	(9,000)
1999	93-183		12	(9,000)	(9,000)
					($42,029)

Note (a): Per USWC response to UTI 20-5, booked amount assumed as pension credit included in both settlements.

If negotiated settlements are not treated as resolutions without any finding on specific costs and/or recoveries, the above tabulation would reflect the net pension expense credits conveyed to ratepayers – even though two of the proceedings that involved the introduction of negative pension costs were negotiated settlements.

PREPARED SURREBUTTAL TESTIMONY OF STEVEN C. CARVER
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US WEST COMMUNICATIONS, INC.
DOCKET NO. T-1051B-99-105

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FAS87 PENSION ASSET

1 Q. Have you review the rebuttal testimony of Mr. Grate on the pension asset issue?
2 A. Yes, I have.

3 Q. On page 42 of his rebuttal, Mr. Grate testifies as follows:

> 4 "One of the fundamental accounting concepts that first year accounting students learn
> 5 is that all assets on a balance sheet must be funded by liabilities or equity. Because
> 6 Qwest cannot withdraw funding money from the Pension Trust for negative expense
> 7 and must, instead, debit the Pension Asset, the source of funding for the Pension Asset
> 8 is Qwest's investors who provide the money to fund debt and equity on Qwest's
> 9 books."

10 How do you respond to this statement?
11 A. This statement is curious. It is true that fundamental double-entry accounting is based on the
12 concept that debits equal credits. It is also true that, on the balance sheet, total assets must
13 equal the total of liabilities and equity. However, Mr. Grate's implication that only investors
14 supply debt and equity funds to support the pension asset is an oversimplification.

15 First, a substantial component of the "equity" recorded on the balance sheet is comprised of
16 retained earnings or cumulative income retained by the Company. If the negative pension
17 credits have <u>not</u> been flowed through to the benefit of ratepayers, those pension credits would
18 have increased the recorded income and, theoretically, resulted in higher retained earnings.

19 Second, Mr. Grate oversimplifies the accounting process. According to the response to ACC
20 Staff Data Request No. UTI 69-12, the average year-to-date Intrastate net investment at May
21 2000 used for the charts at page 9 of Mr. Redding's rebuttal is approximately $1.63 billion.
22 However, the average Intrastate debt and equity capital from the same 1990 Report processor
23 supplied in response to ACC Data Request No. UTI 42-2 S1, Attachment H, is about of $1.33
24 billion. Clearly, the debit side of the balance sheet equals the credit side of the balance sheet,
25 but the process of matching debits with credits is not a simple as that implied by Mr. Grate.

Q. Referring to page 40, Mr. Grate makes the following statement:

> "As I explained in my testimony concerning incentive compensation, ratepayers always benefit from decreases in costs reflected in regulated results of operations under cost of service regulation. Pension Credits are negative costs that reduce revenue requirement. Because every financial period is a test period (regardless of whether it warrants a case before the Commission), every dollar recorded as Pension Credit has a direct effect on revenue requirement. If revenue requirement changes enough, a rate case and a rates change will be warranted. But whether or not a rate case occurs, and regardless of the outcome of the case, ratepayers always benefit from the revenue requirement dampening effect of Pension Credits."

Do you agree?

A. No. Mr. Grate posits that "ratepayers always benefit" from the Company's recording of pension credits. It does not seem to matter that the pension credits may fluctuate significantly from year-to-year, but ratepayers "always" benefit. If the Commission concurs with this theory, then the "as recorded" approach to ratemaking should be symmetrical. If pension credits "always" benefit ratepayers, would it also seem that positive expenses recorded by the Company are always recovered when recorded "because every financial period is a test period (regardless of whether it warrants a case before the Commission)". Interestingly, Mr. Redding does not appear to concur, as he has proposed a rate rider or tracker to capture the annual change in revenue requirement associated with the adoption with SOP 98-1.

Q. At rebuttal page 47, Mr. Grate states:

> "Mr. Carver's testimony is careful to couch his advocacy concerning the reconciliation requirement as his opinion. Mr. Carver's opinion-that the Company bears a burden of demonstrating through a reconciliation that cumulative Pension Credits (the negative pension expense) have been flowed through to its ratepayers-is not a generally accepted ratemaking principle. If it were, then the other elements of ratebase that are created by expense accruals (Accumulated Depreciation and Accumulated Deferred taxes) would also be subject to the same burden that Mr. Carver would impose on the Pension Asset. In fact, his position directly violates widely accepted ratemaking standards by contravening the rule against retroactive ratemaking."

Do you care to comment on this testimony?

A. Yes. First, the Company has the initial responsibility to present a prima facie case to support its requested rate relief. Once that case has been challenged, I believe that the burden does

shift to the Company to demonstrate that it has a right to include the pension asset in rate base – a burden that I do not believe that the Company has carried in this proceeding.

Second, this Commission determines the "generally accepted ratemaking principles" that apply in Arizona. In the last USWC rate case, this Commission concurred with my testimony on this issue and excluded the pension asset from rate base – concluding that "the Company has not presented sufficient evidence to clearly demonstrate that its shareholders have advanced the excess pension amounts." [ACC Decision No. 58927, page 5] As indicated at rebuttal page 53, Mr. Grate and I hold different opinions concerning the Commission's past findings.

Third, Mr. Grate seems to be critical of the fact that I express my opinions in testimony. This is a rather odd comment, particularly since a witness can only offer facts or opinions. I suppose that Mr. Grate only likes the opinions that are set forth in his rebuttal testimony.

Q. At page 48 of Mr. Grate's rebuttal, he states:

> "Mr. Carver asserts that the widely accepted presumption that accrued expenses have been recovered or flowed through in rates does not extend to Pension Asset. [Carver, p. 132, line 24 through p. 133, line 2] However, he fails to offer any sound reason why Pension Asset should not be subject to the same ratemaking principles that govern the other elements of ratebase."

On rebuttal pages 51-52, Mr. Grate further addresses your proposal using an analogy to reconciling the balance of the accumulated depreciation reserve. How do you respond?

A. I do not agree that such a reconciliation would be necessary or appropriate with regard to accumulated depreciation reserves, which I address briefly at pages 127-128 and 132-133 of my direct testimony.

Costs incurred by a regulated entity are often presumed to be covered by existing rates, regardless whether the cost of service study underlying said rates included a specific allowance for those unique costs. In my opinion and experience, this presumption is based on the premise that cost based utility rates are considered to be just and reasonable until such time as a moving

1 party carries its burden to establish that said rates are no longer just and reasonable (i.e., either
2 too high or too low).

3 Pension accounting changed dramatically with the adoption of FAS87. Prior to that change,
4 most companies (including USWC) based the amount of pension costs distributed between
5 expense and capital accounts on the level of contributions actually made to the pension fund.
6 Since the adoption of FAS87, USWC began recording negative pension costs that can and does
7 vary significantly from year to year. [See the table on page 118 of my direct testimony.]

8 Simply because the Company recorded negative pension costs, should regulators assume that
9 ratepayers have fully participated in and enjoyed lower rates as a direct result of the decrease
10 in recorded costs? If so, does that participation justify increasing rate base so that the utility
11 can earn a return on those "negative" costs through the pension asset? As discussed in direct
12 testimony, I do not believe that those questions should automatically be answered in the
13 affirmative.

14 The Company has sought to include a pension asset in rate base that arose from this accounting
15 change. In order to substantiate the inclusion of the pension asset in rate base, the Company
16 has argued that the associated pension credits have been flowed through to the benefit of
17 customers, thereby resulting in lower rates and investors being out-of-pocket for the
18 cumulative amount of the pension asset. In order to substantiate the claim for rate base
19 inclusion, particularly in light of the history associated with pension accounting, I have
20 proposed that the Company be required to clearly demonstrate that the cumulative pension
21 credits flowed through to ratepayers equal or exceed the cumulative pension asset proposed to
22 be included in rate base.

23 Certainly, regulated entities employ accrual accounting for purposes of recording depreciation
24 expense and maintaining the accumulated depreciation reserve. The depreciation accruals also

vary from year to year. However, unlike pension costs, the typical accounting for depreciation does not result from a radical change in accounting, leading to an newly created asset that is not directly "cash affecting" but which the company seeks to include in rate base.

Depreciation accrual rates change periodically and the level of depreciable plant generally increases over time. However, the depreciation accrual process has existed for many years and has not experienced the radical accounting change fostered by FAS87. Also, represcription changes have often been accompanied by rate proceedings, comparable to the current proceeding, unless the parties desired that the accrual rate change be implemented outside the context of a rate proceeding.

I have not suggested or recommended that the recovery of each and every cost of service item should be reconciled with past ratemaking decisions in establishing the cost of service for future periods. However, if ratepayers are to be required to pay a return through the ratemaking process on a pension asset balance (resulting from the recordation of negative pension costs), I believe that regulators must be assured that ratepayers have fully enjoyed reduced rates or somehow been provided the benefit of the negative costs resulting from the adoption of FAS87. In this context, the change in pension accounting and the requested inclusion of the pension asset in rate base requires a demonstration of ratepayer benefits, as discussed previously; otherwise the pension asset should be excluded from rate base.

Q. Does this conclude your prepared surrebuttal testimony?

A. Yes.

DIRECT TESTIMONY OF
STEVEN C. CARVER
US WEST COMMUNICATIONS, INC.
DOCKET NO. E-1051-93-183

Q. Please state your name and business address.

A. My name is Steven C. Carver. My business address is 740 North Blue Parkway, Suite 204, Lee's Summit, Missouri 64086.

Q. What is your present occupation?

A. I am a principal in the firm of Utilitech, Inc., which specializes in providing consulting services for clients who actively participate in the process surrounding the regulation of public utility companies. Our work includes the review of utility rate applications as well as the performance of special investigations and analyses related to utility operations and ratemaking issues.

Q. On whose behalf are you now appearing?

A. Utilitech was retained by the Staff of the Arizona Corporation Commission (hereinafter "Staff" or "ACC Staff") to review the Arizona rate filing of US West Communications, Inc., ("USWC" or "Company") and to file testimony with this Commission respecting the results of our review. Consequently, I am appearing on behalf of the Staff.

Q. What is your educational background?

A. I graduated from State Fair Community College where I received an Associate of Arts Degree with an emphasis in Accounting.

PENSION ASSET

Q. Please identify Staff Accounting Schedule B-6.

A. Staff Accounting Schedule B-6 represents the reversal of the Company's proposal to include a pension asset in rate base. USWC included $55,421,000 in rate base as one of three components which comprise the $34,375,000 amount summarized on R-14 Schedule B-2 Attachment 9.

Q. Please briefly identify and describe these three items.

A. Although R-14 Schedule B-2 Attachment 9 is actually identified by the Company as "CWC Proforma Adjustments", the breakdown of the individual components of the $34,375,000 intrastate adjustment amount is set forth on Company Worksheet No. 18.7 (W/S#18.7) which supports R-14 Schedule B-2 Attachment 3, "Exclusion of Non-cash Items from CWC":

(000's)	CWC Amount	Deferred Inc. Tax Reserve	Net Rate Base
Pension Asset	$ 55,421	$(19,201)	$ 36,220
Deferred Rent	(6,900)	1,085	(5,815)
OPEB Liability	(14,146)	9,142	(5,004)
Total	$ 34,375	$ (8,974)	$ 25,401

[W/S# 18.7 & UTI-384]

The OPEB liability component listed above will be separately discussed in a subsequent testimony section.

Q. Why did you present separate amounts for deferred income tax reserves when such amounts are not included in the Company's proforma CWC rate base adjustment?

A. While the deferred income tax reserves are not included in the Company's specific rate base adjustment, these amounts were nevertheless reflected in rate base through the deferred income tax reserves employed as a rate base offset. If the Company's proforma CWC adjustments are to be excluded from rate base, then the companion deferred income tax reserves should be similarly reversed.

Q. What is the basis for the Company's claim that the pension asset should be included in rate base?

A. The following excerpt from page 54 of Company witness Thompson's direct testimony summarizes the Company's rationale for seeking the inclusion of the pension asset in rate base:

> Under rate of return regulation, the ratepayers reimburse the Company for its pension expense when the expense is booked, creating a source of cash for the Company. Payments to the pension trust fund are the corresponding use of cash for the Company. If the accrued pension expense booked by the Company exceeds the amount needed to be transferred to the trust fund, the Company has the use of this cash until it is remitted to the fund. Alternatively, as is the case with USWC, if payments are required to be made to the trust fund that exceed the pension expense accrued and booked by the Company, it is the investor that has contributed the cash until it is collected from rate payers. It is this lag between the Company's contribution to the pension fund and the recovery of the pension expense from its customers, that I have included in the cash working capital calculation.
> [Thompson Direct, p. 54]

The Company further elaborated on its theory of investor funding in the response to Staff Data Request No. UTI-190:

> The pension asset is created by the booking of an expense credit that lowers the Company's revenue requirement, thereby lowering the customer's rates. Prior to FAS 87, the Company did not immediately recognize changes in the ongoing pension expense and the amount invested in the pension trust fund. With FAS 87, reductions in the level of funding necessary are reflected as reductions in the current pension expense, even to the extent of creating a <u>negative</u> expense that reduces overall corporate expenses. In this way the rate payer benefits from the earnings of the pension trust fund, or changes in actuarial assumptions, by receiving a credit in the revenue requirement for previous contributions from rates. However, since there is no return of cash or capital disinvestment from the trust fund, the stockholder has capital invested in the fund, but is not able to earn a return on the investment, <u>unless the asset</u> (which is the accumulated amount of the pension expense reduction), <u>is included in the rate base</u>. This use of cash for the business is considered a Cash Working Capital adjustment by the Company in this filing.
> [Staff Data Request No. UTI-190; Original Emphasis]

According to the Company, costs are recovered from the customer when the expense is recorded. Therefore, these alleged benefits are said to have resulted from the recording of pension credits or negative pension expense, which total about $67 million from 1987 through 1992 with another $10 million expected in 1993. [Thompson Direct, p. 55]

Q. Could you please describe the events or circumstances which gave rise to the recording of a pension asset?

A. Yes. In December 1985, the Financial Accounting Standards Board (FASB) issued Statement of Financial Accounting Standard No. 87 (FAS87) concerning employers' accounting for pension

costs. Although issued in 1985, FAS87 was first effective for fiscal years beginning after December 15, 1986, which the Company adopted for financial accounting purposes in 1987, subsequent to Decision No. 54843 dated January 10, 1986 (Docket No. E-1051-84-100).

Prior to FAS87, USWC recorded positive pension expense equal to the amount of its contributions to the pension fund. It is only after the adoption of FAS87 that pension expense and pension contributions began to diverge. According to information supplied by the Company, pension funding of "zero" has exceeded the level of negative pension expense determined in compliance with FAS87 by the cumulative amount of approximately $74.8 million (Total Arizona) for the period 1987 through March 1993. It is the March 1993 pension asset recorded on the Company's books and records which USWC allocated to intrastate operations for inclusion in rate base. [Company W/S#18.1]

Q. Since the adoption of FAS87, has the Company continued to record positive pension expense in its accounting records?

A. No. Beginning with the adoption of FAS87 in 1987, the Company began recording negative pension expense (a pension credit) instead of positive pension expense. It is several years' accumulation of this pension credit which the Company represents has resulted in the pension asset which USWC seeks to include in rate base.

Q. Could you briefly outline the rate base concept?

A. Yes. Rate base is commonly viewed as being comprised of net utility asset investments used to provide service to ratepayers, which have not yet been recovered from ratepayers. When utility investors provide the necessary funds to support these company investments, those amounts are generally included in rate base to allow the investors a return to which they are entitled. Similarly, funds advanced, reimbursed, or otherwise paid for by ratepayers are properly excludable from rate base.

With respect to the pension asset, the Company has represented that its shareholders have "invested" the cumulative amount by which pension funding has historically exceeded the recorded pension expense, thereby justifying the inclusion of those amounts in rate base.

Q. How has negative pension expense resulted in a pension asset?

A. Pension expense is normally thought of as being positive (or an added cost) in determining a utility's total expenses. However, as implied by the reference, negative pension expense is actually recorded as a credit or a decrease to total expenses. Under traditional accounting, the pension credit reduces expense and results in a corresponding debit or an increase to a pension asset account.

Q. Since the adoption of FAS87, has the Company continued to make contributions to the pension fund?

A. No. In 1987, USWC's pension plan became over-funded in that the funding limitations of the Internal Revenue Code restricted the Company from making any further tax deductible contributions to the pension plan. Since that time, the Company has made no contributions to the plan.

Q. Do you agree with the Company that its investors have contributed additional cash payments as a result of recording pension credits, or negative pension expense, which is less than its contributions to the pension fund?

A. No. The Company seeks to improperly combine the ratemaking treatment of pension costs with its historical accounting for this item as evidence that ratepayers have benefited to the detriment of its shareholders. If contributions to the pension fund (i.e., "zero" contributions since 1987) exceed the "negative" pension expense recorded, then the difference is typically recognized as a "prepayment". The assumption relied upon by the Company is that this prepayment must have been funded by its investors, since ratepayers benefit from negative expense, while investors are unable to withdraw comparable amounts from the pension fund to recover the amount of negative pension expense flowed to ratepayers.

1 Q. Do you agree that ratepayers have received the benefit of
2 these negative expenses merely as a result of the Company
3 recording the pension credits?
4 A. No, I do not agree with the the Company's premise for several
5 reasons. First, I do not believe that it is possible to
6 accurately quantify the accumulated net pension recoveries
7 from or benefits provided to ratepayers. In order to prepare
8 such a calculation, it is my opinion that it would be
9 necessary to reconcile the amount of actual pension costs
10 recovered from ratepayers with the amounts actually
11 contributed to the pension fund since the establishment of the
12 pension plan. Such a quantification would be significantly
13 complicated by the fact that the level of pension costs
14 charged to expense over the years does not necessarily equate
15 to the amount of pension costs recovered from ratepayers
16 (i.e., included in cost of service) or contributed to the
17 pension plan.
18
19 Second, the Company's pension plan and pension accounting have
20 existed for decades. By relying on the pension asset balance
21 recorded since 1987, the Company has excluded a substantial
22 portion of the history which underlies the pension fund,
23 pension accounting and cost of service considerations from
24 this calculation. Assuming that net recoveries from
25 ratepayers can be accurately quantified, the Company
26 inappropriately started the analysis in 1987, the year that
27 FAS87 was adopted by USWC. From a cost of service

perspective, the use of data beginning in 1986 would indicate that ratepayers have provided more pension costs through rates than have been contributed to the pension plan. Such a calculation leads to further questions as to whether rate base should be reduced, rather than increased as proposed by the Company.

Third, USWC has sought to include the entire pension asset balance in rate base even though the Company has not demonstrated that 100% of these benefits have been actually flowed through to its ratepayers.

Q. Why did you conclude that the quantification of benefits inappropriately began in 1987?

A. The ratemaking treatment of pension credits or pension expense did not commence in 1987 with the adoption of the FAS87. Starting the calculation in 1987 represents only a small part of the overall history of pension accounting and regulatory recovery. In many situations, it may be possible to clearly point to an occurrence or event and establish whether the ratepayer or investor has paid for or benefited from a particular transaction. However, in this case, it is my opinion that the overall evidence does not support the Company's contention that shareholders have advanced the excess pension funds.

1 Q. Since FAS87 was adopted by the Company in 1987, why is it
2 necessary to consider any information prior to 1987?
3 A. The Company has alleged that costs are recovered from
4 ratepayers as expensed and that the ratepayers have benefited
5 to the detriment of its shareholders by limiting its review to
6 the period from 1987 through 1992. The current situation with
7 regard to negative pension expense has a substantial
8 historical context which, if ignored, could lead to
9 inappropriate conclusions.
10
11 Prior to FAS87, the pension costs charged to expense and the
12 pension fund contributions made by the Company were equal.
13 Subsequent to FAS87, the Company has recorded negative pension
14 expense and made no fund contributions. In order to establish
whether ratepayers have inappropriately benefited to the
16 shareholders detriment, neither the act of recording expense
17 nor making contributions necessarily establish the amount that
18 ratepayers have "invested" in or "benefited" from pension
19 expense through the cost of service.
20
21 Pension funding is basically determined from a comparison of
22 the pension plan assets with the expected pension liability.
23 The pension plan assets are comprised of prior contributions
24 to the fund plus the actual returns received on the plan
25 assets. Once the plan assets exceed the expected liability
26 and meet certain provisions of the Internal Revenue Code, the
27 plan is considered overfunded and no further tax deductible

contributions can be made. However, the plan assets have accumulated over a very long period of time, not just the last three or four years.

Since the adoption of FAS87, the Company has been recording a negative pension expense primarily due to the pension fund's favorable investment experience and an increase in the actuarial rates of return. It is these stellar returns that have primarily contributed to the negative pension expense being recorded by the Company since 1987. [Staff Data Request No. UTI-390 and RUCO Data Request No. CGI-142]

In order to establish that ratepayers have improperly benefited to the investors detriment, it is my opinion that the Company would need to clearly demonstrate that the amount of funds collected from ratepayers through the cost of service were fully contributed to the pension plan. If that were the case, then the earnings on 100% of the pension costs recovered from ratepayers would have primarily resulted in the negative pension expense. To the extent that ratepayers received any benefit from the negative pension expense, the investors would have been harmed by not being able to withdraw comparable amounts from the pension plan.

Q. How does this position differ from the Company's presentation on this issue?

A. This is similar to the Company's argument, but with two major differences. First, USWC has provided only a short-term comparison of pension expense and pension funding. Second, the Company has effectively assumed that pension expense equates to ratepayer recoveries. While this theory has some limited application to alternative forms of regulation based on the sharing of earnings above predetermined thresholds, it does not apply to USWC's Arizona operations. The Company has not clearly demonstrated that the overall cumulative amount of pension expense recovered from ratepayers through the cost of service over the long-term was, in fact, fully contributed to the pension plan. To "prove" investor harm, a long-term analysis comparing rate recoveries to pension fund contributions would be required.

Q. How does the amount of pension costs included in cost of service compare to the actual pension contributions and pension expense/credits recorded by the Company?

A. While the Company has presented an argument that costs or benefits are recovered from or provided to ratepayers when the expense is booked to support including the pension asset in rate base, the amount of pension expense actually recorded by the Company varies significantly from both the actual amount of pension contributions and the level of pension costs included in the cost of service. While the following estimate comparison starts only one year prior to USWC's adoption of

FAS87, it illustrates the potentially extreme differences in these amounts:

[millions]	Arizona Intrastate			
	Amount Funded	Recorded Expense	USWC Rate Base Allowance	Cost of Service @
1986	$ 18.9	$ 17.1	$ 0	$ 12.2
1987	0	(.9)	#	12.2
1988	0	(4.0)	#	12.2
1989	0	(9.5)	#	1.5
1990	0	(8.6)	#	(.6)
1991	0	(9.1)	#	(4.8)
1992	0	(9.3)	#	(9.9)
1993	0	(1.4)	#	(2.5)
Total	$ 18.9	$ (25.7)	$ (55.4)	$ 20.3 @

[Updated Staff Data Request No. UTI-383]
Annual distribution unknown.
@ See Appendix SCC-1

Assuming that this comparison indicates that ratepayers may have theoretically received some benefit through the cost of service as a result of the cost of service pension credit during 1990-1993, it does not demonstrate that ratepayers have received benefits in the amount of USWC's proposed rate base allowance. The estimated $20.3 million of cumulative pension expense included in the cost of service since 1986 is more than the $18.9 million funded since 1986 by about $1.4 million. This is far from USWC's proposed $55.4 million intrastate rate base allowance.

Q. Why did you start the above comparison with the year 1986?

A. The year 1986 represents the year in which the rate order immediately preceding the adoption of FAS87 was implemented. By starting with 1986 to compare expense, funding and cost of

1 service levels, it is possible to examine how closely the cost
2 of service allowance for this item has followed the amount of
3 pension costs the Company has charged to expense. As shown by
4 this comparison, these amounts do not "track" at all.
5
6 Q. Do you believe that all elements of the cost of service
7 included in past rates should be reconciled with current cost
8 levels to determine prospective rate treatment for each item?
9 A. No. As a matter of ratemaking policy, I do not recommend that
10 the Commission rely solely on past decisions in establishing
11 cost of service. However, it is my opinion that the above
12 comparison of funding, expense and cost of service levels is
13 indeed relevant in demonstrating the Company's failure to meet
14 its burden to establish that investors have some claim to
5 inclusion of the pension asset in rate base.
16
17 If the funded status and related earnings of the pension plan
18 were created solely with shareholder moneys, I could
19 understand the Company's concerns on this issue. On the other
20 hand if ratepayers are assumed to have substantially funded
21 the Company's past pension contributions, then the inclusion
22 of the Company's "pension asset" in rate base will improperly
23 charge ratepayers a return on a portion of the very funds they
24 have already provided to the Company and would result in a
25 windfall to USWC's investors. As shown by the above
26 comparison, the Company's ratepayers appear to have
27 substantially provided the pension costs that have been funded

since 1986. For these reasons, the Commission should reject the Company's rate base request.

Q. How did you determine the amount of pension costs included in the cost of service during this period?

A. In response to Staff Data Request Nos. 191, 386, 387 and 388, USWC provided the amount of pension expense included in cost of service beginning with the rate case immediately preceding the Company's adoption of FAS87, as follows:

Docket #	Order Date	Intrastate Cost of Service Pension Expense
84-100	1/21/86	$12.2 million
88-146	3/01/89 @	(.6) million
91-004	7/15/91	(9.9) million

@ Interim Decision No. 56363.

As noted in an earlier testimony section, the 1986 order represents the only litigated case of the three dockets listed above. The 1989 and 1991 orders were the result of negotiated settlements. While I do believe it is neither possible nor appropriate to attempt to delve into the cost of service components comprising a negotiated settlement, I nevertheless assumed that the Company's response to the referenced discovery was reasonably accurate in estimating the cost of service for the limited purpose of illustrating the amount of pension expense which may have been theoretically included in the cost of service since 1986.

If no consideration had been afforded these settlement amounts provided by the Company, I would have been required to use the $12.2 million of pension expense from the 1986 rate order for every year in the comparison. This would have demonstrated an even higher level of pension costs recovered from ratepayers.

Q. Do you agree that the Company recovers costs from ratepayers when expensed and in the amount expensed on its books?

A. No, not necessarily. It is true that a common simplifying assumption in the ratemaking process is that costs are recovered as expensed. However, this assumption is not globally applied, even by the Company. If this statement were true without exception, then utilities would have absolutely no need to obtain regulatory authority to defer any incurred cost for future amortization recovery, as the act of expensing costs on an incurred basis would provide the needed recovery.

For example, the Company immediately recognized the write-off of the FAS106 transition benefit obligation (TBO) for financial statement purposes in 1992. If costs are recovered from ratepayers as expensed, it would logically follow that the Company should have similarly recorded the expensing of the TBO for regulatory accounting (MR basis accounting) purposes in 1992, thereby immediately recovering such costs from its Arizona intrastate ratepayers. However, this is not the approach followed or recommended by the Company.

1 Similarly, under this theory of recovery as expensed, there
would be no need to amortize the catch-up accrual for
3 compensated absences or synchronize the effective date of
4 depreciation represcription changes (i.e., depreciation rate
5 increases) with a rate proceeding. If the Company was able to
6 substantiate a $100 million increase in depreciation expense,
7 such a change could be readily implemented between rate cases,
8 under the Company's theory, as the moneys would automatically
9 be recovered from ratepayers through the simple action of
10 charging the added costs to expense. Obviously, the Company's
11 assumption of automatic recovery as expensed is not realistic.
12 However, if the Company were interested in implementing
13 authorized represcription increases without a concomitant rate
14 increase, I might be willing to seriously consider such a
proposal, provided it would not spawn future Company proposed
16 ratemaking adjustments decreasing the depreciation reserve to
17 recognize that the increased depreciation expense implemented
18 between rate cases had not been recovered from ratepayers.
19
20 Q. How does this theory of recovery of expense as recorded relate
21 to the traditional ratemaking process?
22 A. Whenever a rate case is filed by a utility, it assumes a risk
23 that the rates filed and ultimately approved will either be
24 inadequate or excessive, no matter what test year approach or
25 series of adjustments are proposed by the parties. Generally,
26 utility rates are authorized based on a known and measurable
test year cost of service regardless of the actual level of

costs which might be incurred during the rate-effective period. If utility rates are inadequate, then the remedy available to the Company is to timely file for a rate increase. Conversely, excessive utility rates normally require the filing of a complaint-style investigation by the commission staff or consumer group, as utilities are rarely willing to voluntarily initiate base rate reductions.

It is widely accepted that cost based utility rates, once established by a ratemaking body, are deemed to be just and reasonable until such time as a moving party carries its burden of proof to establish that said rates are no longer just and reasonable. Costs incurred by the utility are often presumed to be covered by existing rates, regardless whether the cost of service study underlying said rates included a specific allowance for that unique cost. Otherwise, the result could entail a endless reconciliation process comparing each element of actual costs during the rate-effective period with the cost of service details underlying the preceding rate case order. However, this presumption does not extend to the actual adjustment of utility rates charged ratepayers between rate cases to track specific cost levels, such as negative pension expense or represcription changes.

It is also generally recognized that to allow utilities to collect additional funds from ratepayers in the future simply because expenses were incurred which had not been specifically

provided for in the determination of the existing base rates is considered retroactive ratemaking. While past expenses are frequently employed in quantifying or developing the prospective cost of service on which overall rates are based, it is improper to establish future rates at levels intentionally designed to recover past losses or under-recoveries due to a historical imbalance in the matching of rates and actual expenses.

In spite of the realities of the ratemaking process, the Company has relied on an "as recorded" cost recovery theory to support an allegation that the prospective ratemaking process should be modified to recognize that past accounting practices have benefited ratepayers (i.e., negative pension expense) to the detriment of its investors. In my opinion, the Company must assume an even greater burden to demonstrate the existence of this harm than has been presented in this proceeding.

Q. You previously indicated that USWC has sought to include the entire pension asset balance in rate base even though the Company has not demonstrated that 100% of these benefits have been flowed through to its ratepayers. Would you please explain this statement?

A. Yes. While I disagree with the Company's calculations, USWC has represented by its proposed rate base treatment that ratepayers have received approximately $55.4 million

(intrastate) in benefits as a result of the pension credits. Even if the Commission were to rely on this calculation, there is still a margin between the $55.4 million test year pension asset balance [W/S#18.7] and the assumed $42.8 million ($25.7 million plus $17.1 million) of alleged ratepayer cost of service benefits received since 1987.

If ratepayers have not received the balance of these credits, then they must have been retained by the Company's investors. In the event that the Commission were to conclude that some amount of pension asset should be included in rate base, it would be totally inappropriate to include therein any benefits retained by the Company's investors, as such treatment would unnecessarily penalize the Company's ratepayers. It is my opinion that the Company has not presented sufficient evidence clearly demonstrating that it is the investors, not the ratepayers, who have advanced the excess pension amounts to include the pension asset in rate base.

BEFORE THE ARIZONA CORPORATION COMMISSION

U S WEST COMMUNICATIONS

DOCKET NO. E-1051-93-183

PREPARED SURREBUTTAL TESTIMONY
OF
STEVEN C. CARVER

On Behalf of the

Arizona Corporation Commission Staff

May, 1994

1 PENSION ASSET

2

3 Q. What is the purpose of this section of your surrebuttal
4 testimony?
5 A. This section of my surrebuttal testimony addresses the
6 rebuttal testimony filed by Company Witness Thompson
7 (pages 8-21) on the pension asset issue.
8
9 Q. At pages 10 through 12 of his rebuttal, Mr. Thompson
10 states that the pension analysis you present on page 27
11 of your direct testimony is incomplete, although on the
12 right track. He then proceeds to extend your analysis
3 back to 1976. Do you concur with Mr. Thompson's
14 modification of your analysis?
15 A. No. There are several reasons why I disagree with Mr.
16 Thompson's calculations. Each of these reasons revolve
17 around the premise at line 5, page 22 of my direct
18 testimony which states: "...I do not believe that it is
19 possible to accurately quantify the accumulated net
20 pension recoveries from or benefits provided to
21 ratepayers." However, it is my belief that the Company
22 must provide just such a quantification in order to carry
23 its burden to prove that its investors have, in effect,
24 supplied a cash rebate to its customers as alleged by Mr.
25 Thompson [Thompson Rebuttal, p.8].
6

1 Q. Would you briefly outline those reasons?
2 A. Yes. First, the focus of this issue concerns whether
3 ratepayers have benefited at investor expense. In order
4 to realistically make such a determination, it would be
5 necessary to essentially reconcile every element of cost
6 of service with the actual costs the Company has incurred
7 over time. While easily said, it is my opinion that this
8 task is impossible. Certain cost of service elements may
9 increase at the same time that other elements decrease,
10 thereby providing the Company, on balance, with an
11 opportunity to earn a reasonable rate of return.
12
Whenever a rate regulated enterprise assesses whether to
14 seek an increase in revenue requirement, it is the total
15 cost of service which must be evaluated, not just the
16 increasing or decreasing cost components. This fact is
17 amply demonstrated by Mr. Thompson's testimony during the
18 cross-examination wherein he stated that the Company did
19 not seek a rate increase for a period of almost 20 years
20 from 1954 to 1971 [Tr. 529]. By deciding when and
21 whether to file for a rate increase, the Company plays a
22 significant role in its recovery or non-recovery of
23 costs.
24
25 Second, as stated on page 30 of my direct testimony, I do
not believe that it is either possible nor appropriate to

attempt to delve into the cost of service components comprising a negotiated settlement. In preparing the analysis set forth on page 27 of my direct testimony, I did make a simplifying, yet conservative, assumption that employed negative pension expense for the stipulated settlements resulting from Docket Nos. E-1051-88-146 and E-1051-91-004. Had I not made such an assumption, the cost of service column of the comparison presented on page 27 would have been even greater, as the $12.2 million of positive pension expense would have been employed for each and every year of the analysis.

Q. What was the effect of that simplifying assumption?

A. Using Mr. Thompson's expanded analysis as presented on page 12 of his rebuttal, such an assumption can be quite significant as demonstrated by the following data:

[thousands]	Arizona Intrastate		
	COS Without Stipulated $	COS With Stipulated $	Difference
1976	$ 6,270	$ 6,270	$ 0
1977	6,270	6,270	0
1978	6,270	6,270	0
1979	6,270	6,270	0
1980	6,270	6,270	0
1981	8,819	8,819	0
1982	16,464@	18,079	(1,615)
1983	16,464@	19,231	(2,767)
1984	16,655	16,655	0
1985	16,655	16,655	0
1986	12,226	12,226	0
1987	12,226	12,226	0
1988	12,226	12,226	0
1989	12,226@	1,329	10,897
1990	12,226@	(850)	13,076
1991	12,226@	(4,846)	17,072
1992	12,226@	(9,929)	22,155
1993	3,057@	(2,482)	5,539
Total	$ 195,046	$ 130,689	$ 64,357

[Staff Data Request No. UTI-949]
@ Settled rate proceedings. Amounts based on prior COS.

The cost of service amounts included in this comparison could be understated by as much as $64 million during this time period. This differential alone exceeds the $55.4 million pension asset (gross of deferred income tax reserves) the Company has proposed to include in rate base. Such a wide differential further underscores the importance of assumptions and quantification difficulties as the overall time frame expands.

Q. Please continue.

A. Third, Mr. Thompson's calculations include another flaw that substantially overstates the results of his comparison. As admitted by Mr. Thompson during a series of cross-examination questions, his analysis compares apple and oranges [Tr. 495-499]. The funded amounts presented in Column A of his comparison include both the expense and capital components of pension costs, while the Column B amounts include only the expense component of pension costs.

While Mr. Thompson has stated that his calculations were designed to mirror my calculations, I intentionally used this information for three reasons: (a) the data I presented was readily available; (b) the time period covered by my review was of limited duration; and (c) the overstatement of the amount funded in relation to the cost of service amounts introduced yet another avenue of conservatism into my comparison. However, given Mr. Thompson's interest in expanding the calculation another ten years into the past, it is my belief that it is extremely important that these amounts be presented on a common basis, if any consideration is to be afforded such amounts.

Q. Were you present during Mr. Thompson's cross-examination earlier in this proceeding?

1 A. No.
2
3 Q. Have you reviewed the transcript of Mr. Thompson's
4 cross-examination in this proceeding?
5 A. Yes.
6
7 Q. Are you aware that he has generally testified that it
8 would be more appropriate to include pension costs
9 capitalized in cost of service Column B of his comparison
10 for consistency purposes rather than remove the
11 capitalized pension cost from the funded Column A?
12 A. Yes, that is my understanding of his testimony.
13
14 Q. Do you agree?
15 A. No, not for the purposes of this proceeding. I do agree
16 with Mr. Thompson that the pension plan and pension
17 funding have existed for decades. However, the detailed
18 information required to include capitalized pension costs
19 in the cost of service column of his comparison on
20 rebuttal page 12 is simply not available. The only
21 information that does exist is the split of pension fund
22 contributions between expense and capital. Consequently,
23 an expense to expense comparison can be readily prepared.
24
25 Q. Do you have a breakdown of the pension contribution
amounts between expense and capital?

A. Yes. The following distribution was obtained from Mr. Thompson's rebuttal workpapers:

[thousands]	Arizona Intrastate		
	Amount Funded - Expense -	Amount Funded - Capital -	Total Amount Funded
1976	$ 8,742	$ 2,489	$ 11,231
1977	9,502	2,944	12,446
1978	11,373	3,718	15,091
1979	15,014	4,240	19,254
1980	16,466	4,276	20,742
1981	19,231	4,055	23,286
1982	22,743	3,042	25,785
1983	16,655	1,828	18,483
1984	12,775	1,779	14,554
1985	14,291	1,801	16,092
1986	17,111	1,773	18,884
1987	0	0	0
1988	0	0	0
1989	0	0	0
1990	0	0	0
1991	0	0	0
1992	0	0	0
1993	0	0	0
Total	$ 163,903	$ 31,945	$ 195,848

[Staff Data Request No. UTI-949]

Based on the above distribution of pension contributions between expense and capital, the $65,157,000 cost of service difference presented on page 12 of Mr. Thompson's rebuttal testimony is overstated by about $31,945,000 due to this inconsistency in the presentation.

Q. How do you respond to Mr. Thompson's comments during cross-examination [Tr. 499] that some of the amounts capitalized are still in the capital accounts and have not yet been recovered by the Company?

1 A. Mr. Thompson's statement is quite correct as far as it
2 goes. However, the $32 million of capitalized pension
3 costs have been capitalized as a component of plant in
4 service and theoretically included in rate base until
5 said amounts are recovered as a component of book
6 depreciation. So, depending on how one values this rate
7 base component of the cost of service, the Company has
8 been compensated for its carrying costs on the
9 capitalized pension amounts through rate base inclusion.
10 This added complexity is yet another example of the
11 impossibility of the task of the reconciliation process
12 discussed previously. Nevertheless, if a consistent
comparison is to be made over a longer period of time,
14 the more appropriate presentation is on an expense basis,
15 not capital plus expense.
16
17 Q. If you did not believe that such a quantification was
18 possible, why did you prepare the analysis which appears
19 on page 27 of your direct testimony?
20 A. The Company has claimed investor harm as a result of past
21 accounting and cost of service determinations. It was my
22 belief that the Commission should at least be presented
23 with some quantitative measure by which to assess this
24 allegation. As a result, I made a series of simplifying
25 yet conservative assumptions to present an analysis

1 showing that the Company has not met its burden on this
2 issue.
3
4 Based on the above conservative assumptions as included
5 in my direct testimony, the Company recovered
6 approximately $1.4 million ($20.3 minus $18.9 million)
7 more pension costs through the cost of service than was
8 funded from 1986 through March 1993. While the Company
9 has represented that it has under-recovered pension costs
10 by about $65.2 million since 1976, I have explained how
11 that quantification may be overstated by as much as $96.3
12 million ($64.4 million stipulation assumption plus $31.9
million cost mismatch).
14
15 Q. Do you have anything further you wish to address with
16 respect to the pension asset issue?
17 A. Yes. During his cross-examination [Tr. 573-575], Mr.
18 Thompson discussed the origin of the $50 million of OPEB
19 plan assets that generated the $7.2 million of plan
20 earnings used by the Company to reduce OPEB costs as an
21 enticement for this Commission to adopt FAS106. I find
22 it quite ironic that, after a series of questions from
23 RUCO's counsel, Mr. Thompson stated that the $50 million
24 of OPEB assets came from the very same shareholders who
25 he also says have allegedly provided the pension asset
USWC has proposed to include in rate base. However,

rather than consistently propose the inclusion of these shareholder funded OPEB assets in rate base, the Company suggests a rate base reduction for an OPEB liability even though Arizona rates have always reflected PAYGO.

PREPARED TESTIMONY OF STEVEN C. CARVER TABLE OF CONTENTS

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FAS87 PENSION ASSET

1 Q. What is the purpose of Committee Adjustment No. B-3?

2 A. Committee Adjustment No. B-3 represents the elimination of the Company's proposal to
3 include a pension asset in rate base. Referring to USWC Adjustment A-19, the Company
4 has proposed to include $20,398,078 in the average test year intrastate rate base.

5 Q. If USWC has proposed to include a $20,398,078 pension asset in rate base, why does
6 Committee Adjustment No. B-3 remove only $12,847,000 from rate base?

7 A. The amount shown on USWC Adjustment A-19 as the Company rate base allowance does
8 not recognize, or is shown gross of, the related deferred income tax reserves. While the
9 deferred income tax reserves are not included within, or netted against, the Company's
10 specific pension asset rate base adjustment, these amounts were nevertheless reflected in the
11 quantification of rate base through the deferred income tax reserves employed as a rate base
12 offset. If the Company's proforma pension asset adjustment is to be excluded from rate base,
13 I believe that the companion deferred income tax reserves should be similarly reversed.

14 Q. What is the basis for the Company's claim that the pension asset should be included in rate
15 base?

16 A. At pages 58-59 of his direct testimony, Company witness Grate briefly discusses the pension
17 asset issue and introduces Exhibit 4 (49 pages of additional testimony) as well as Exhibits
18 4.1 through 4.9. At page 27 of Exhibit 4, Mr. Grate provides the following summary as to
19 why the Commission should include the pension asset in rate:

20 The Commission should allow inclusion of the pension asset in
21 ratebase because it is created by a contra-expense (the pension credit) that is
22 included in cost of service and for which the Company receives no cash

> inflow from the pension funds. The Commission should include the pension asset in rate base in order to allow the Company to earn a return on an asset that investors have provided that reduces revenue requirement and, hence, the rates charged to ratepayers.
> [Grate, Exhibit 4, pages 27-28]

Mr. Grate further elaborates on this point beginning at page 31 of Exhibit 4, as follows:

> One can reasonably argue that, as a matter of public policy, the funds attributable to pension credits should not have been made available to ratepayers. Conversely, one can argue that ratepayers should get the cash represented by the pension credit. We need not resolve that issue because whether ratepayers should or should not have received cash for the pension credit is now moot. The fact is the pension credits *have* been included in USWC's Utah revenue requirements and Utah ratepayers *have*, in fact, been getting the benefit of those pension credits.
>
> It is important to remember this point, the ratepayers have been getting the cash. They have been free to do whatever they want with that cash, including use it to make purchases, retire debt, invest, etc. So they have been fully enjoying the financial benefit of all of the cash made available through the pension credit.
>
> The Pension asset, net of accumulated deferred taxes, is the amount by which the Company's investors have been funding this cash flow to ratepayers. And to this day, investors have not been compensated for the use of the capital they have provided to fund this cash stream to ratepayers.
> [Grate, Exhibit 4, page 31]

As indicated in the above quotes, it is the Company's view that the pension asset represents investor supplied funds. In essence, the Company has proposed rate base inclusion of the pension asset on the basis that ratepayers have benefited through a lower cost of service since the adoption of Statement of Financial Accounting Standard No. 87 ("FAS87") in 1987. Accordingly, the Company believes that the pension asset should be included in rate base as ratepayer compensation for the use of investor funds.

1 Q. Could you please describe the events or circumstances which gave rise to the recording of
2 a pension asset?
3 A. Yes. In December 1985, the Financial Accounting Standards Board (FASB) issued FAS87
4 concerning employers' accounting for pension costs. Although issued in 1985, FAS87 was
5 first effective for fiscal years beginning after December 15, 1986, which the Company
6 adopted for financial accounting purposes effective January 1, 1987.

7 Prior to FAS87, the amount of pension costs distributed to expense and capital accounts was
8 equal to the level of contributions actually made to the pension fund. It was only after the
9 adoption of FAS87 that pension costs expensed/capitalized and pension contributions
10 diverge.

1 Q. Since the adoption of FAS87, has the company continued to record positive pension expense
12 in its accounting records?
13 A. No. Beginning with the adoption of FAS87 in 1987, the Company began recording negative
14 pension expense (a pension credit) instead of positive pension expense. It is several years'
15 accumulation of this pension "credit" which has resulted in the pension asset the Company
16 now seeks to include in rate base.

17 Q. Could you briefly outline the rate base concept?
18 A. Yes. Rate base is commonly viewed as being comprised of net utility asset investments used
19 to provide service to ratepayers, which have not yet been recovered from ratepayers. When
20 utility investors provide the necessary funds to support these company investments, those
21 amounts are generally included in rate base to allow the investors a return to which they are
22 entitled. Similarly, funds advanced, reimbursed, or otherwise paid for by ratepayers are

1 properly excludable from rate base. With respect to the pension asset, the Company has
2 represented that its shareholders have effectively "invested" the cumulative amount by which
3 pension funding has historically exceeded the recorded pension expense, thereby justifying
4 the inclusion of those amounts in rate base.

5 Q. How has negative pension expense resulted in a pension asset?
6 A. Pension expense is normally thought of as being positive (or an added cost) in determining
7 a utility's total expenses. However, as implied by the reference, negative pension expense
8 is actually recorded as a credit or a decrease to total expenses. Under traditional accounting,
9 the pension credit may reduce both expense and capital accounts, thereby resulting in a
10 corresponding debit or an increase to a pension asset account.

11 Q. Do you agree with the Company that its investors have funded additional cash flow to
12 ratepayers as a result of recording pension credits?
13 A. No. Mr. Grate's Exhibit 4 does not provide any definitive or comprehensive analysis of the
14 amount of pension credits ratepayers have actually received through the ratemaking process.
15 Instead, I believe that the Company seeks to improperly combine the historical accounting
16 for pension costs with presumed ratemaking effects in an attempt to demonstrate that
17 USWC's customers have benefitted to the detriment of its investors.

18 If the cumulative contributions to the pension fund exceed the "negative" pension expense
19 recorded, then the difference is typically recognized as a "prepayment", or pension asset.
20 The assumption apparently relied upon by the Company is that the "prepayment" must have
21 been funded by its investors, since ratepayers benefit from negative pension costs, while
22 investors are unable to withdraw comparable amounts from the pension fund as

compensation for the negative pension costs flowed to rate payers. On an intrastate basis, the following table summarizes the annual pension credits to expense and capital accounts which comprise the pension asset USWC has proposed to include in rate base:

	Pension Credit			
Year	Capital	Expense	Total	Pension Asset
1987	($114,876)	($796,837)	($911,713)	$911,713
1988	(248,803)	(2,125,274)	(2,374,077)	3,285,790
1989	(431,964)	(3,442,154)	(3,874,118)	7,159,908
1990	(623,383)	(4,212,794)	(4,836,177)	11,996,085
1991	(390,957)	(2,379,824)	(2,770,781)	14,766,866
1992	(462,663)	(2,779,545)	(3,242,208)	18,009,074
1993	(503,916)	(2,855,522)	(3,359,438)	21,368,512
1994	641	4,321	4,962	21,363,550
1995	(10,090)	(72,298)	(82,388)	21,445,938
1996	(18,509)	(131,156)	(149,665)	21,595,603
Total	($2,804,520)	($18,791,083)	($21,595,603)	

Source: USWC response to CCS Data Request No. UTI 4-5.

Q. Why does the 1996 intrastate pension asset of $21,595,603 in the above table not tie to the $20,398,078 pension asset that the Company has proposed to include in rate base through USWC Adjustment A-19?

A. The above table reflects the intrastate pension asset as of year-end 1996. The amount the Company has proposed to include in rate base is an average 1996 balance.

1 Q. In your opinion has the existence of a pension credit resulted in a decrease to the cost of
2 service in each year since 1987?
3 A. No. For that to be the case, negative pension costs would need to have been included in the
4 cost of service and flowed to customers each year when recorded by the Company. In effect,
5 the Company would have to demonstrate that the benefits resulting from the recording of the
6 pension credits, which total about $21.6 million (intrastate) from 1987 through the 1996 test
7 year, have been flowed through to its ratepayers on an annual basis.

8 Q. Do you believe that ratepayers have received the benefit of these pension credits merely as
9 a result of the Company recording the negative pension costs?
10 A. No, I disagree with that premise for several reasons. First, I do not believe that it is possible
11 to accurately quantify the accumulated net pension recoveries from or benefits provided to
2 ratepayers. In order to prepare such a calculation, I believe that it would be necessary to
13 reconcile the amount of actual pension costs recovered from ratepayers with the amounts
14 actually contributed to the pension fund since the establishment of the pension plan. Such
15 a quantification would be significantly complicated by the fact that the level of pension costs
16 charged to expense over the years does not necessarily equate to the amount of pension costs
17 recovered from ratepayers (i.e., included in cost of service) or contributed to the pension
18 plan.

19 Second, the Company's pension plan and pension accounting have existed for decades. By
20 focusing solely on the accounting entries underlying the pension asset balance recorded since
21 1987, the Company has excluded from consideration a substantial portion of the history
22 which underlies the pension fund, pension accounting and cost of service. Assuming that
23 net recoveries from ratepayers can be accurately quantified, the Company inappropriately

1 relied solely on its accounting records for purposes of determining the amount includable in
2 rate base. From a cost of service perspective, data provided by the Company for the period
3 1987 through 1996 does not appear to support the position that ratepayers have unduly
4 benefitted from the pension credits from a cost of service perspective.

5 Third, USWC has sought to include the entire pension asset balance in rate base even though
6 the Company has not demonstrated that 100% of these benefits have been actually flowed
7 through to its ratepayers. Unless the Company can somehow demonstrate that the negative
8 pension costs have unquestionably been flowed through to its customers, USWC's rate base
9 proposal would charge ratepayers with a return on funds they never received -- thereby,
10 unnecessarily benefitting Company investors.

Q. Why did you conclude that the Company inappropriately relied solely on its accounting
12 records for purposes of determining the rate base allowance for pension credits?
13 A. In my opinion, the ratemaking treatment of pension credits, or negative pension expense, did
14 not commence in 1987 with the adoption of the FAS87 and is not fully reflected in the
15 Company's accounting records. Starting the calculation in 1987 represents only a small part
16 of the overall history of pension accounting and regulatory recovery. In many situations, it
17 may be possible to clearly point to an occurrence or event and establish whether the ratepayer
18 or investor has paid for or benefited from a particular transaction. However, in this case, it
19 is my opinion that the overall evidence does not support the Company's contention that
20 investors have advanced any "excess" pension funds.

21 For ratepayers to have benefited from the recording of negative pension costs, it is my
22 opinion that the Company would have to allege that costs are recovered from ratepayers as

1 expensed and that the ratepayers have benefited to the detriment of its shareholders. I do not
2 accept, nor do I believe that the Company can sustain such a representation. The question
3 of cost recovery with regard to negative pension expense has a substantial historical context
4 which, if ignored, could lead to inappropriate conclusions.

5 Prior to FAS87, the amount of pension costs charged to expense/capital accounts and
6 contributed to the pension fund were equal. Subsequent to FAS87, the Company has
7 recorded negative pension costs and made no fund contributions. In order to establish
8 whether ratepayers have inappropriately benefited to the shareholders detriment, neither the
9 act of recording costs nor making contributions necessarily establish the pension cost amount
10 that ratepayers have "invested" in or "benefited" from through the cost of service.

11 Pension funding is basically determined from a comparison of pension plan assets with the
12 expected pension liability. The pension plan assets are comprised of prior contributions to
13 the fund plus the actual returns received on the plan assets. Once the plan assets exceed the
14 expected liability and meet certain provisions of the Internal Revenue Code, the plan is
15 considered overfunded and no further tax deductible contributions can be made. However,
16 the plan assets have accumulated over a long period of time, not just the last few years.

17 Since the adoption of FAS87, the Company has been recording a negative pension expense
18 primarily due to the pension fund's favorable investment experience. The annual returns on
19 pension plan assets have ranged from 13.13% to 23.59% in six of the ten years since 1987
20 [USWC response to CCS Data Request No. UTI 4-8]. It is these "stellar" returns that have
21 primarily contributed to the negative pension expense being recorded by the Company, in
22 accordance with FAS87, since 1987.

In order to establish that ratepayers have improperly benefited to the investors' detriment, it is my opinion that the Company would need to clearly demonstrate that the amount of funds collected from ratepayers through the cost of service were fully contributed to the pension plan and that the Company was truly out-of-pocket for additional cash outlays. However, I do not believe that such a situation applies with regard to this issue.

Q. How does this position differ from the Company's presentation on this issue?

A. Although similar to the Company's argument, there are two major differences. First, USWC has not sufficiently compared and evaluated the pension cost and pension funding issue. Second, the Company has effectively assumed that the mere recording of negative pension costs equates to ratepayer recoveries. While this theory has some limited application in situations where alternative forms of regulation are based on a sharing of earnings above predetermined thresholds, it does not apply to the Company's Utah operations. The Company has simply not demonstrated that the overall cumulative amount of pension costs recovered from ratepayers through the cost of service has, over the long-term, been fully contributed to the pension plan. To "prove" investor harm, a longer term analysis comparing rate recoveries to pension fund contributions would be required.

Q. In your opinion, has the Company taken the position with regard to these pension credits that investors have been harmed because ratepayers have benefitted at their expense?

A. Yes. However, I do not believe that ratepayers have thus far received any substantial benefit which would justify the inclusion of a significant pension asset in rate base.

Q. Since the Company's adoption of FAS87 in 1987, how does the amount of pension costs included in cost of service compare to the pension credits recorded by the Company?

A. While the Company seems to argue that costs or benefits are recovered from or provided to ratepayers when the expense is booked in order to support including the pension asset in rate base, the amount of pension costs actually recorded by the Company appears to vary significantly from the level of pension costs included in cost of service. On July 28, 1997, USWC faxed a response to Utilitech in response to CCS Data Request No. UTI 4-3 which attempted to quantify the amount of pension credits included in revenue requirement since the adoption of FAS87. Although this analysis initially appeared to support the Company's pension asset proposal, further review of the details underlying the ratemaking process during the late 1980's and early 1990's lead me to conclude that the analysis does not reflect the amount of net pension credits provided to ratepayers during this time frame.

The following information, showing the amount of pension credits allegedly flowed through to ratepayers , was summarized from the Company supplied analysis which initially appeared to support the USWC's position on the pension asset issue. [Note: The following intrastate pension credits are shown in millions and do not recognize the effect of revenue growth on customer collections.]

Docket	Effective Date of Order	Ratemaking Pension Expense	Total Credit in Rates
88-049-07	9/22/88	($3.7)	($4.1)
90-049-03/06	6/22/90	(4.7)	(4.8)
90-049-03/06	1/01/91	(16.2)	(17.4)
92-049-05	4/15/93	(6.2)	(7.3)
95-049-05	11/27/95	0.0	0.0
Total		($30.8)	($33.6)

Source: See response to CCS Data Request No. UTI 4-3.

On its face, this comparison seemed to indicate that the rates in effect during the period 1987-1996 have resulted in pension credits being flowed through to ratepayers in the approximate amount of $30.8 to 33.6 million. However, after further review, I do not believe that this analysis demonstrates that these pension credits have actually been flowed through to the benefit of ratepayers.

Q. Why do you believe that this Company prepared analysis does not support USWC's proposal to include the pension asset in rate base?

A. There are several reasons why I believe that this analysis does not accurately depict the amount of pension credits which may have been flowed through to ratepayers. First, the Company's analysis does not attempt to identify or quantify the amount of pension expense included in rates which were in effect from January 1, 1987 through September 22, 1988. Second, it appears that the orders relied upon by the Company for Docket Nos. 88-049-07 and 90-049-03/06 were associated with interim orders of the Commission or were resolved through negotiated agreements. Third, the Commission had also concluded that the Company had over-earned during the late 1980's. Overall, I believe that these concerns raise considerable doubt as to whether the Company has been able to demonstrate that ratepayers have benefitted at the expense of USWC's investors.

Q. Why should the above analysis have started in 1987?

A. 1987 represents the year in which USWC adopted FAS87. The rate order immediately preceding the adoption of FAS87 appears to have been implemented with an effective date of January 1, 1986. [Report and Order dated December 31, 1995, Docket No. 85-049-02.] By starting with 1987 to compare annual FAS87 based pension credits and pension amounts included in the cost of service, it would be possible to examine how closely the cost of

1 service allowance for this item has followed the recorded pension credits (or alleged
2 ratepayer "benefits") the Company seeks to include in rate base.

3 Since the test year in Docket No. 85-049-02 was calendar year 1985, any rates in effect
4 during the period January 1987 through September 1988 would not have reflected any
5 pension credits associated with FAS87. Consequently, any positive pension costs included
6 in the development of the rates effective during this period would tend to offset or mitigate
7 the net amount of pension credits included in the cost of service since the FAS87 adoption.
8 By failing to reflect this impact, the Company appears to have misstated its calculated
9 pension benefits. After all, the Company's proposed pension asset includes pension credits
10 recorded in 1987 and 1988 of approximately $2.4 million. If the rates charged to ratepayers
11 during the period 1987 and 1988 primarily reflected positive pension expense, then the
2 Company's pension asset accounting process would clearly overstate the amount of pension
13 credits flowed through to ratepayers.

14 Q. How much pension costs were included in cost of service in the rate case immediately
15 preceding Docket No. 88-049-07?
16 A. I do not know. CCS Data Request No. UTI 4-3 specifically requested this information, but
17 USWC chose not to provide the requested information. However, it has been my experience
18 in other USWC rate proceedings that such pension costs were positive, not negative.

19 Q. In explaining why the Company's analysis provided in response to CCS Data Request No.
20 UTI 4-3 does not accurately depict the amount of pension credits which may have been
21 flowed through to ratepayers, you indicated that it appears that the orders relied upon by the

Company for Docket Nos. 88-049-07 and 90-049-03/06 were associated with interim orders or negotiated agreements. Why do you believe that this is important?

A. In assessing the amount of pension credits flowed through to ratepayers, it is imperative that only those orders which specifically address the various components of cost of service be considered. In the Commission's June 19, 1991 Report and Order in Docket No. 90-049-03/06, the Commission expressed the following concern with regard to the non-specific nature of negotiated settlements:

> The Stipulation is a negotiated settlement of revenue requirement issues, as distinct from each party advancing its own interest through discovery and hearing, in an adversarial way, on every single issue. Negotiation is a process of compromise in the interest of reaching an end result that each party is able to accept. The Commission has criticized this process of bargaining and compromise before, because it leaves the Commission unaware of important details. The Commission knows only outcomes. In addition, and perhaps most importantly, some issues have been "decided" in the course of the negotiations without having been brought to the Commission's attention. Therefore, the Commission had been reluctant to accept stipulations in recent major rate cases, and, where stipulation seemed the prudent course, has sought to confine them to purely technical as distinct from policy issues. [Docket No. 90-049-03/06, June 19, 1991 Report and Order, page 10]

With regard to Docket No. 88-049-07, the parties entered into a negotiated stipulation which provided for a $16 million rate reduction effective September 22, 1988, with an additional $10 million effective January 1, 1989. Paragraph 6 of the terms of the stipulation stated:

> The Stipulation reflects the compromise of disputed issues and does not necessarily reflect the positions that any particular party would have asserted in hearings or in court in the absence of approval of the Stipulation. [Docket No. 88-049-07, October 13, 1988 Order, Stipulation page 9]

Certainly, a rate case resolved by stipulated agreement among the parties is not the same as a Commission action authorizing an interim rate change. However, interim rate changes also

do not necessarily result in the consideration of the detailed cost of service data that the Commission criticized as lacking from the negotiated settlement process. Also in Docket No. 90-049-06, the Commission discussed the considerations underlying interim rate changes in the following excerpts from the interim order issued June 22, 1990:

> The amended statute makes clear that the rights of the parties are somewhat restricted in an interim proceeding and that an abbreviated hearing is contemplated. The presentation of a major portion of a rate case in the context of an interim proposal renders the interim consideration meaningless. The statute only requires an adequate prima facie showing that an interim rate increase or decrease is justified. The parties to this restricted process are substantially protected by the ability of the Commission to order a refund or surcharge to remedy any over- or underestimate of revenues and costs. [Docket No. 90-049-06, June 22, 1990 Order, pages 5-6]
>
> . . .
>
> Our interim rate decrease considerations do not proceed on the basis of a previously filed complete rate change application, as has been true of all our interim rate increase cases. The information presented to us in this case has been developed by witnesses on the basis either of USWC's actual performance during 1989, adjusted to be forward-looking, or its 1990 budget. Witnesses, given the time demands and the nature of interim proceedings, have not analyzed this information to the extent they will have done for the full rate case.
>
> The fact that the information base and the analyses so far performed are incomplete, plus the lack of a complete set of rate case issues, heightens our concern to reach the dollar amount of any interim rate decrease carefully. [Docket No. 90-049-06, June 22, 1990 Order, page 12]

At page 35 of the June 19, 1991 Report and Order Docket No. 90-049-03/06, the Commission refers to two interim orders in the long history of this proceeding which were dated June 22, 1990 and January 1, 1991. These two interim reductions decreased revenues by $10,711,000 and $8,238,000, respectively. Because of the "prima facie", restricted nature of the interim proceedings and the negotiated resolution of the final decrease of $19,799,000

1 effective July 1, 1991, I am unable to conclude that the full amount of any pension credits
2 embedded within the test year used in this proceeding were partially or fully flowed through
3 to ratepayers.

4 In summary, I do not believe that the Company has demonstrated that any specific test year
5 pension credits associated with interim or stipulated proceedings have benefitted ratepayers
6 to the detriment of investors.

7 Q. The third reason you gave that the Company's pension credit analysis does not accurately
8 depict the amount of pension credits which may have been flowed through to ratepayers
9 concerned a Commission conclusion that the Company had over-earned during the late
10 1980's. Could you explain the rationale for this statement?
1 A. Yes. At page 15 of the June 22, 1990 interim Order in Docket No. 90-049-06, the
12 Commission also found that "the Company [had] earned in excess of its authorized rate of
13 return on equity by an amount approximating $49 million over the period of the last three
14 and more years, despite revenue reductions during that time in excess of $56 million."
15 Unless the Company can some how "color code" the pension credits recorded during this
16 three-plus year period, substantial questions arise as to whether the $11,996,085 of
17 cumulative pension credits (i.e., pension asset balance) as of December 1990 had actually
18 been flowed through to customers or whether those pension credits were fully retained by
19 the Company as part of the $49 million of excess earnings retained for the benefit of
20 USWC's investors.

21 Further, when the finding of excess earnings is coupled with the interim increases and final
22 negotiated resolution of Docket No. 90-049-03/06 as discussed previously, I believe that

1 ratepayer participation in any significant portion of the pension credits alleged to have been
2 considered in the ratemaking process is highly questionable and suspect.

3 Although the Company apparently believes that investors have somehow been "harmed" by
4 ratepayers receiving the benefit of the pension credits, how can shareholders be harmed when
5 pension credits appear to have been retained by the Company and used to increase earnings?
6 In my opinion, the Company has not presented sufficient justification to support its request
7 to include the pension asset in rate base.

8 Q. Do you believe that all elements of the cost of service included in past rates should be
9 reconciled with current cost levels to determine prospective rate treatment for each item?
10 A. No. As a matter of ratemaking policy, I do not recommend that the Commission rely solely
1 on or otherwise reconcile past decisions in establishing cost of service for future periods.
12 However, it is my opinion that the consideration of past Commission rate orders and the
13 Company analysis referenced previously are indeed relevant in demonstrating the Company's
14 failure to meet its burden to establish that investors have some claim to inclusion of the
15 pension asset in rate base.

16 If the funded status and related earnings of the pension plan were created solely with
17 shareholder moneys, I could understand the Company's concerns on this issue. On the other
18 hand if ratepayers are assumed to have substantially funded the Company's past pension
19 contributions with USWC actually retaining the pension credits, then the inclusion of the
20 Company's "pension asset" in rate base would improperly charge ratepayers a return on funds
21 they have already provided to the Company and would result in a windfall to investors. As
22 discussed above, I do not believe that the Company has demonstrated that ratepayers have

1 unduly benefitted by this accounting. For these reasons, the Commission should reject the
2 Company's rate base request.

3 Q. Do you believe that the Company recovers costs from ratepayers when expensed, and in the
4 amount expensed, on its books?
5 A. No, not necessarily. It is true that a common simplifying assumption in the ratemaking
6 process is that costs are recovered as expensed. However, this assumption is not globally
7 applied. In Docket No. 94-049-08, the Commission issued a Report and Order on May 9,
8 1995 associated with USWC's gain on the sale of several rural telephone exchanges in Utah.
9 At page 9, the Commission states:

10 The gain from the completed sales was booked in the years in which the sales
11 were consummated, 1992 and 1993. No rate case is presently pending using
12 1992 or 1993 as a test year, nor is it likely that those years will become test
13 years in future rate cases. Without a rate case based on those test years, the
14 sales have no direct effect on rates.
15 [Docket No. 94-049-08, May 9, 1995 Report and Order, page 9]

16 Further, if this premise of cost recovery were true without exception, utilities would have
17 absolutely no need to obtain regulatory authority to defer or recover any incurred costs, as
18 the act of recording such costs as current period expense would provide the needed recovery.
19 Under such a theory, the Company would not have needed to seek Commission authority to
20 defer and amortize one-time transition costs such as compensated absences, merit awards,
21 medical & dental costs, or costs associated with FAS112 or FAS106.

22 Q. How does this theory of "as recorded" cost recovery relate to the traditional ratemaking
23 process?

A. Whenever a rate case is filed by a utility, it assumes a risk that the rates filed and ultimately approved will either be inadequate or excessive, no matter what test year approach or series of adjustments are proposed by the parties. Generally, utility rates are authorized based on a known and measurable test year cost of service regardless of the actual level of costs which might be incurred during the rate-effective period. If utility rates are inadequate, then the available remedy is to timely file for a rate increase. Conversely, excessive utility rates normally require the filing of a complaint-style investigation by the commission staff or a consumer group, as utilities are rarely willing to voluntarily initiate base rate reductions.

It is widely accepted that cost based utility rates, once established by a ratemaking body, are deemed to be just and reasonable until such time as a moving party carries its burden of proof to establish that said rates are no longer just and reasonable. Costs incurred by the utility are often presumed to be covered by existing rates, regardless of whether the cost of service study underlying said rates included a specific allowance for that unique cost. Otherwise, the result could entail an endless reconciliation process comparing each element of actual costs during the rate-effective period with the cost of service details underlying the preceding rate case order. However, this presumption does not extend to the actual adjustment of utility rates charged ratepayers between rate cases to track specific cost levels, such as negative pension expense or represcription changes.

It is also generally recognized that to allow utilities to collect additional funds from ratepayers in the future simply because expenses were incurred which had not been specifically provided for in the determination of the existing base rates is considered retroactive ratemaking. While past expenses are frequently employed in quantifying or developing the prospective cost of service on which overall rates are based, it is improper to

1 establish future rates at levels intentionally designed to recover past losses or
2 under-recoveries due to a historical imbalance in the matching of rates and actual expenses.

3 In spite of the realities of the ratemaking process, the Company has basically relied on an "as
4 recorded" cost recovery theory to support an allegation that the prospective ratemaking
5 process should be modified to recognize that past accounting practices have benefited
6 ratepayers (i.e., negative pension costs) to the detriment of its investors. In my opinion, the
7 Company must assume an even greater burden to demonstrate the existence of this alleged
8 "harm" than has been presented in this proceeding.

9 Q. Do you have any further comments on this issue?
10 A. Yes. In Docket Nos. 92-049-05 and 95-049-05, the Commission was presented with several
11 different ratemaking issues associated with the pension asset and FAS87 pension credits.
12 In both proceedings, the Commission concluded that the record evidence did not contain
13 sufficient evidence nor a comprehensive analysis of the issues raised by the Company.

14 At page 58 of his direct testimony, Mr. Grate expresses an opinion that his Exhibit 4 rectifies
15 that problem. Although Exhibit 4 does provide the Commission with a significant volume
16 of additional information, I still do not believe the Company has adequately demonstrated
17 that ratepayers have received substantial pension credit benefits to support the inclusion of
18 the pension asset in rate base. Although the Commission stated in its order in Docket No.
19 95-049-05 (page 7) that the pension credits have been returned to ratepayers through a
20 reduction in revenue requirements, it is my opinion that the amount of any such benefits are
21 relatively immaterial in comparison to the pension asset balance. For the reasons previously

1 set forth, the Commission should deny the Company's request to include a pension asset in
2 rate base and similarly remove the related deferred income tax reserves from rate base.

PREPARED SURREBUTTAL TESTIMONY OF STEVEN C. CARVER
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FAS87 PENSION ASSET

Q. Could you please summarize the Company's rebuttal conclusions regarding the Committee's pension asset testimony?

A. Rather than attempt to summarize USWC's fourteen pages of rebuttal testimony to the Committee's recommendation on this issue, the following quote appears at page 64 of Mr. Grate's rebuttal testimony:

> The Committee seeks to impose a burden of proof of the pension asset which, by its own account, cannot be met. In support of that position, the Committee filed testimony that is shot through with inconsistent application of ratemaking principles, contradictions, misrepresentations, illogic, misleading arguments and red herrings. It is a finely crafted exercise in obfuscation, which should be read with great care, and disregarded.
> [Grate Rebuttal, page 64]

That Mr. Grate appears ruffled is not wholly unexpected, given that the position offered by the Committee was adopted by the Arizona Corporation Commission in USWC's last Arizona rate case. The following excerpt appears at page 5 of the ACC's Opinion and Order in Docket No. E-1051-93-183 (Decision No. 58927):

> We concur with the Company that the overfunded pension assets which were contributed by shareholders should be included in rate base. It would be unfair to permit ratepayers to benefit by reduced expenses resulting from capital invested by Company shareholders. However, at the same time it would be equally unfair to include the overfunded pension assets in rate base if ratepayers have previously provided those funds to the Company. Although the Company has presented evidence in an effort to demonstrate that since 1986 the shareholders have provided the monies which resulted in the current overfunded pensions asset, Staff's analysis has raised significant questions as to the accuracy of the Company's claim. Even if we were convinced of the accuracy of the Company's number for the 1976-1993

> period, we would still not be able to conclude that shareholders have advanced excess pension amounts from the inception of the pension account. Based on all the above, we find the Company has not presented sufficient evidence to clearly demonstrate that its shareholders have advanced the excess pension amounts. Accordingly, we must deny the Company's request to include the net amount of overfunding of $36,213,000 in rate base. [Arizona Docket No. E-1051-93-183, Decision No. 58927, page 5]

Because of the length of the testimony submitted by the Company on this issue, my surrebuttal testimony will only address the more significant issues which I believe Mr. Grate raises.

Q. At page 50 of his rebuttal testimony, Mr. Grate states:

> In cost of service ratemaking, it is axiomatic that all of the components of ratebase are calculated using the accounting records of the utility. No attempt is made to measure and reconcile the actual recovery in rates of the various elements that make up the ratebase. Nevertheless, this is precisely what the Committee argues USWC must do in order to justify inclusion of pension asset in ratebase.

Do you agree with this testimony?

A. Yes, but I do not agree with the application proposed by Mr. Grate. It is true that the components of rate base are normally calculated using the accounting records of the utility. However, ratemaking adjustments to the recorded amounts may be required for the purposes of removing amounts not properly chargeable to ratepayers or including amounts not recorded by the utility. While it is true that the Company has recorded a pension asset, the focus of this issue concerns whether ratepayers have benefitted from reduced rates at investor expense, because negative pension credits were flowed through to ratepayers. If so, then I would agree that the pension asset should be included in rate base.

1 With the adoption of FAS87, the accounting for pension costs changed so radically that some
2 companies who previously recorded zero or positive pension costs began recording negative
3 costs shortly following adoption. If ratepayers are to be required to pay a return through the
4 ratemaking process on a pension asset balance (resulting from the recordation of negative
5 pension costs), I believe that regulators must be assured that ratepayers have fully enjoyed
6 reduced rates or somehow been provided the benefit of the negative costs uniquely resulting
7 from of the adoption of FAS87. In the absence of such an affirmative showing, the pension
8 asset (net of any related accumulated deferred income tax reserves) should be excluded from
9 rate base.

10 Q. Are the rate base components of plant investment, depreciation reserve and deferred income
11 tax reserve valued at recorded book cost?
12 A. These items are often recognized in the ratemaking process at recorded book costs. When
a utility engages in the construction of assets dedicated to the provision of regulated utility
14 service, those expenditures are typically included in rate base in the company's next rate case
15 provided specific disallowances are not warranted. However, the ratemaking process may
16 result in the rate base exclusion of certain amounts recorded by the utility that are associated
17 with a variety of issues including the cost of projects that: are not used and useful, represent
18 excess capacity, reflect unnecessary costs or are not related to the provision of utility service.

19 Unlike the expenditure of funds on construction projects, USWC does not write a check for
20 the pension asset. The pension asset arises from the Company having recorded negative
21 pension expense. For USWC to argue that the pension asset must be included in rate base,
22 I believe that the Company must present support for at least one of the following theories:

1 ▸ ratepayers automatically received the benefit of lower rates by the mere act of the
2 Company recording the pension credits (i.e., negative expense) or
3 ▸ ratepayers received the benefit because the pension credits have been consistently
4 used to reduce the rates the Company has charged customers through the ratemaking
5 process.

6 Obviously, USWC does not believe that it is necessary for the Company to demonstrate that
7 ratepayers have participated in the pension credits through the ratemaking process.
8 Additionally, the Company does not believe that the recordation of costs has anything to do
9 with the recovery of such amounts.

10 Q. At page 53 of his rebuttal testimony, Mr. Grate discusses the concept of recovering costs
11 through the ratemaking process. What is the basis of your comment that the Company does
not believe that the recordation of costs has anything to do with their recovery?
13 A. Referring to pages 47-48 of my direct testimony, costs incurred by a utility are often
14 presumed to be covered by existing rates, regardless whether the cost of service study
15 underlying said rates included a specific allowance for those unique costs. This is consistent
16 with Mr. Grate's rebuttal testimony at page 53.

17 But, if the act of recording pension credits has the effect of flowing the negative pension
18 expense through to the benefit of ratepayers, then I would expect a similar act of recording
19 positive charges to expense to result in a consistent view that ratepayers pay for any amounts
20 so recorded (see Carver Direct, page 46). However, the Company is seeking special
21 ratemaking treatment for the amortization of amounts attributable to the FAS106, FAS112
22 and ELG/RDA issues. If the Company really believes the concept of recovering costs on an

"as recorded" basis, USWC should simply charge these costs to expense for recovery from ratepayers.

At page 54 of his rebuttal, Mr. Grate addresses the following point made at page 46 of my direct testimony regarding the recovery/ deferral of costs: "if this premise of cost recovery were true without exception, utilities would have absolutely no need to obtain regulatory authority to defer or recover any incurred costs, as the act of recording such costs as current period expense would provide the needed recovery." Not surprisingly, Mr. Grate characterizes this portion of my testimony as "incredible", "preposterous" and "specious". However, this does not stop the Company from arguing that there is no need to determine whether the ratemaking process has actually captured the pension credits for the benefit of ratepayers – after all, the Company has recorded the pension credits.

It is difficult to avoid the conclusion that the Company's theory of ratepayer participation through the recording of costs must be dependent on whether the particular accounting entry increases or decreases expense. Expense decreases are presumably flowed through to customers, but expense increases apparently are not. In support of this inconsistent treatment, Mr. Grate discusses the Division's position concerning the Company's proposed adjustment to recover the FAS106 phase-in amounts from ratepayers. At rebuttal page 83, Mr. Grate states:

> It is axiomatic that under cost-of-service rate of return regulation, regulators grant an opportunity to recover a cost by including the cost in the calculation of rates. The Division is incorrect to claim USWC had an opportunity to recover these costs when they were specifically excluded from USWC's cost of service.
> [Grate Rebuttal, page 83]

1 I believe that the ratemaking process is faced with a rather unique situation as a result of the
2 negative pension costs many companies have experienced as a result of the adoption of
3 FAS87. Simply because a company records negative pension costs, should regulators
4 assume that ratepayers have fully participated and enjoyed lower rates as a direct result of
5 the decrease in recorded costs? If so, does that participation justify increasing rate base so
6 that the utility can earn a return on those negative costs through the pension asset? As
7 discussed in my direct testimony (pages 30-49), I do not believe that those questions should
8 be automatically answered in the affirmative. Instead, I believe that the regulatory process
9 should review the ratemaking history and experience surrounding the pension issue in greater
10 detail before concluding that rate base inclusion of the pension asset is appropriate for a
11 particular utility.

12 Q. If the act of recording costs is not dispositive of their recovery from or flow through to
ratepayers, how would it be possible to determine whether the pension credits have been
14 consistently used to reduce regulated rates?
15 A. In order to definitively determine whether pension credits have been consistently used to
16 reduce regulated rates, it would be necessary to essentially reconcile every element of cost
17 of service with the actual costs the Company has incurred over time. While easily said, it is
18 my opinion that such an undertaking is impossible. Certain cost of service components
19 increase over time while others may decrease, thereby providing the Company, on balance,
20 with an opportunity to earn a reasonable rate of return. So, instead of requiring the
21 reconciliation of every element, I have recommended that the Company be required to
22 demonstrate that the cumulative amount of pension credits specifically flowed to the benefit
23 of ratepayers, through the ratemaking process, is equal to or in excess of the pension asset
24 proposed for rate base inclusion.

Q. At page 52 of his rebuttal testimony, Mr. Grate states that "[t]he Committee fails to even address – must less explain – why a reconciliation of the amount of pension expense in rates is required to justify inclusion of pension asset in ratebase while no reconciliation of depreciation expense included in rates or deferred tax expense included in rates is required to justify the inclusion of depreciation reserves or deferred tax reserves in ratebase." Do you have any comments?

A. Yes. The accrual accounting process for depreciation and income taxes has existed in different forms for many years. There is simply no question that utility rates have historically been established using accrual accounting methods for these items. In comparison, the adoption of accrual accounting for pension costs is a fairly recent development. Previously, pension costs were recorded and included in utility rates on a "funding" method (also known as the "as paid" or "cash" method) of accounting. Under the funding method, it was not possible for a company to record negative pension costs, because funding could not be negative. As indicated earlier, the adoption of accrual accounting has resulted in a substantial change in valuation for some companies in that pension credits have replaced the "zero" or positive expenses previously recorded under the cash method.

Further, I have been involved in several rate cases in which the adoption of FAS87 resulted in the recording of pension costs in amounts higher than funding levels, leading the utility to record a pension liability. Interestingly enough, those utilities have been very adamant about not reducing rate base for the pension liability, alleging that the higher pension costs have not been included in rates and paid for by ratepayers. So, if the Commission ultimately adopts USWC's views on determining whether ratepayers have enjoyed the recording of pension credits, the same theory should be consistently applied to situations in which a pension liability has been recorded by the subject utility.

1 Q. Referring to page 58 of Mr. Grate's rebuttal testimony, he appears to be critical that six pages
2 of your direct testimony were devoted to a critique of the Company's original analysis of
3 pension credits provided to ratepayers in rates, even though USWC has twice revised its
4 response to the original Committee data request. Do you care to comment on this point?
5 A. Yes. I find this portion of the Company's rebuttal testimony disingenuous because it detracts
6 from the debate of the pension asset issue. This testimony distorts the facts and
7 circumstances surrounding CCS Data Request No. UTI 4-3, which merit further clarification
8 and discussion herein.

9 First, CCS Data Request No. UTI 4-3 was submitted to the Company on May 21, 1997. The
10 initial response to this request was received on June 18, 1997 and simply stated: "The
11 requested information is all in the public record of the Utah PSC and is as readily available
12 to the CCS as to the Company."

13 Second, on July 28, 1997, Mr. Grate faxed me a copy of the first supplemental response to
14 CCS Data Request No. UTI 4-3 which conveyed what Mr. Grate references on page 58 of
15 his rebuttal as the "original version of that analysis."

16 Third, on August 1, 1997, the Committee filed my final direct testimony which supplanted
17 the earlier submittals of my testimony filed on July 18 and July 28, 1997. This final direct
18 testimony contained the six pages which discuss the Company's "original version of that
19 analysis."

20 Fourth, with the benefit of my direct testimony in hand, USWC revised its original analysis
21 twice. Although the Company's supplemental responses indicate that these revisions were
22 dated August 14th and August 19th, I did not actually receive these revisions until August 18th

1 and August 21st, respectively. So, it is true that USWC has twice revised this analysis, but
2 the revisions occurred two to three weeks following the filing of my direct testimony.

3 Q. Before discussing the more recently revised pension analysis provided in response to CCS
4 Data Request No. 4-3, Mr. Grate alleges that your direct testimony on pages 44-45
5 encourages the Commission to engage in retroactive ratemaking in assessing whether the
6 pension credits recorded by the Company in the late 1980's were actually flowed through to
7 ratepayers. Do you agree?
8 A. No. Referring to pages 41-44 of my direct testimony, I explain why I believe that the
9 Company's original analysis improperly relied on interim orders or negotiated agreements
10 associated with Docket Nos. 88-049-07 and 90-049-03/06. At pages 44-45 of my direct
11 testimony, I simply refer to the Commission having found in its June 22, 1990 interim Order
12 in Docket 90-049-06 that "the Company [had] earned in excess of its authorized rate of
13 return on equity by an amount approximating $49 million over the period of the last three and
14 more years, despite revenue reductions during that time in excess of $56 million."

15 My testimony does not recommend that the Company be required to refund these amounts
16 to ratepayers. Nor does my testimony propose that the Commission use these amounts to
17 reduce rate base. The purpose of this portion of my direct testimony is simply to further
18 underscore the fact that the Company has not demonstrated that all pension credits recorded
19 during this period of time have been fully and completely provided to ratepayers.

20 Q. At page 59 of his rebuttal, Mr. Grate refers to page 45 of your direct testimony where you
21 discuss the Company's apparent retention of pension credits, which appear to have increased
22 USWC's earnings. He contends that this represents "another example of a misleading
23 argument" and is an "unsubstantiated assertion". Is that true?

1 A. No. The Company either misunderstands my testimony on this point or is attempting to
2 mislead the Commission. First, the Company did record annual pension credits in the
3 amounts set forth on page 34 of my direct testimony. To my knowledge, the Company has
4 not contested this fact.

5 Second, if the Company did record the pension credits, there are only two available options
6 to account for the ultimate disposition of these amounts. Either the pension credits were
7 flowed through to ratepayers or they were not flowed through to ratepayers. Under the
8 former option, revenues would be reduced in the amount of the pension credits provided to
9 ratepayers. Accordingly, the reduction in revenues would offset the reduction in expense and
10 operating income would be unaffected by the pension credit transactions. On the other hand,
11 the latter option would not result in any pension credit flow-through to ratepayers, so
12 revenues would not be reduced. This option would result in a "zero" change to revenues to
13 offset the reduction in expense, resulting in an increase to operating income.

14 Third, if it can not be demonstrated that the pension credits were flowed through to
15 ratepayers, which is my position, then the pension credits were retained by the Company and
16 used to increase earnings above levels otherwise attainable. It is possible that this situation
17 may have contributed to the Commission's findings that the Company had over-earned in the
18 late 1990's, despite the rate reductions implemented during that period.

19 Q. Starting at the bottom of rebuttal page 60 and continuing through page 63, Mr. Grate
20 discusses his Rebuttal Exhibits 11 and 12. Are you familiar with these exhibits?
21 A. Yes. These exhibits reflect the Company's final revised response to CCS Data Request No.
22 UTI 4-3 which I received on August 21st. At pages 40-41 of my direct testimony, I address

1 why I believed the original analysis should have started in 1987. This concern has been
2 adequately addressed by the Company's revised analysis and is no longer at issue.

3 Q. At page 62 of his rebuttal and in Notes C and D to Exhibit 12, Mr. Grate states that his
4 analysis is "conservative" because the Company's analysis assumes that "zero" pension
5 credits were included in the rate reductions effective September 22, 1988 and January 1,
6 1989 in Docket 88-049-07. Do you agree?
7 A. No. Certainly, the total amount of pension credits would have been higher if he had not
8 assumed "zero" credits for this period, but I do not believe that the assumption of "zero" is
9 appropriate. The following intrastate analysis summarizes the results from Mr. Grate's
10 Exhibit 11 with the appropriate rate case recovery assumptions which I believe should be
11 made:

1 (Millions)

2 Docket	Resolution	Effective Date of Order	USWC Pension Expense Credit	CCS Pension Expense Credit
3 85-049-02	Order	1/1/86	$-7.41	$-7.41
4 Volun. Reduct.	Voluntary	12/22/87	0.00	-14.49
5 88-049-07	Stipulated	9/22/88	0.00	-2.11
6 88-049-07	Stipulated	1/1/89	0.00	-6.64
7 88-049-07	Order	11/15/89	1.98	1.98
8 90-049-03/06	Interim	6/22/90	1.82	1.74
9 90-049-03/06	Interim	1/01/91	16.19	7.54
10 92-049-05	Stipulated	4/15/93	6.23	6.23
11 94-049-08	N/A		0.00	0.00
95-049-05	Order	11/27/95	-0.01	-0.01
13 Total			$18.80	$-13.16

14 Source: See Revised response to CCS Data Request No. UTI 4-3 and Grate Rebuttal
15 Exhibits 11 and 12.
16 Note: "Positive" amounts denote pension credit. "Negative" amounts represent
17 pension debit, or positive expense.

18 Unless the Company can somehow demonstrate that pension credits arising between litigated
19 rate proceedings are flowed through to the benefit of ratepayers, I believe that this
20 comparison indicates that the rates in effect during the period January 1987 through
21 November 1997 have resulted in pension costs being charged to ratepayers in the
22 approximate cumulative amount of $13.16 million (intrastate), excluding the effect of access
23 line or revenue growth. This cumulative amount of positive pension expense (not pension
24 credits) that appears to have been included in the cost of service since 1986 is substantially
25 at variance with USWC's proposed amount of cumulative pension credits, also identified as

1 the pension asset, that the Company has proposed to include in rate base. I do not believe
2 that this analysis supports the Company's contention that ratepayers have benefitted by some
3 $20.4 million (intrastate) of cumulative pension credits at shareholder expense.

4 Q. Could you explain the assumptions you have relied upon which resulted in the differences
5 observed in the above table?
6 A. Yes. First, Mr. Grate's Exhibit 11 assumes that the amount of pension credit was "zero" for
7 the voluntary rate reduction and for the first two steps of Docket 88-049-07. Because of the
8 voluntary nature of the first reduction and the stipulation associated with the first two steps
9 of Docket 88-049-07, I have assumed that the amount of the pension costs included in
10 Docket 85-049-02 carry-forward until the effective date of the final order in Docket 88-049-
11 07.

2 Second, Docket 90-049-03/06 was comprised of two interim changes and a final stipulated
13 change. Consequently, I have assumed the continued carry-forward of the pension credit
14 amount from the final order in Docket 88-049-07 until the effective date of the order in
15 Docket 92-049-05.

16 At pages 41-44 of my direct testimony, I discuss the results of my review of these
17 Commission orders and explain why the valuation of pension credits provided to ratepayers
18 should exclude any detailed information associated with interim and stipulated rate changes.

19 Q. In quantifying the revised amounts included in the CCS pension expense column of the
20 above comparative analysis, did you use any amounts from sources other than Mr. Grate's
21 Exhibit 11?
22 A. No. I used the intrastate amounts and effective year multipliers from Mr. Grate's Exhibit 11.

EXHIBIT T__

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
Docket Nos. UT-930074, UT-930307 and UT-931378

US WEST COMMUNICATIONS, INC.
(FAS 106 & 112)
PREPARED TESTIMONY OF
STEVEN C. CARVER

On Behalf of the

PUBLIC COUNSEL SECTION,
OFFICE OF ATTORNEY GENERAL

and

TELECOMMUNICATIONS RATEPAYERS ASSOCIATION FOR
COST-BASED AND EQUITABLE RATES

March, 1994

1 **PENSION ASSET**

2

3 Q. Would you please outline the Company's Pension Asset
4 proposal?
5 A. Yes. USWC has proposed to include a Pension Asset of $63
6 million in rate base for the 1992 sharing calculation
7 because ratepayers have allegedly received benefits to
8 the detriment of shareholders as a result of the
9 Company's pension accounting process. Without a rate
10 base allowance for the pension asset, the Company claims
11 that ratepayers receive a double benefit and shareholders
12 are harmed.
13
14 Q. Do you agree with the Company's proposal to include the
15 pension asset in rate base?
16 A. No. As I previously indicated, the Commission should not
17 modify the rate base used for sharing purposes to include
18 the pension asset. However, I do recommend that the
19 deferred income tax reserve balance associated with the
20 pension asset be eliminated from rate base commencing
21 with the 1993 plan year.
22
23 Q. What is the basis for the Company's claim that the
24 pension asset should be included in rate base?
25 A. The following excerpt from page 12 of Company witness
26 Wright's direct testimony summarizes the Company's

rationale for seeking the inclusion of the pension asset in rate base:

> USWC recovers pension costs from its ratepayers when they are expensed. To the extent that USWC's pension expenses are negative, without any withdrawals from the pension fund, current ratepayers benefit through lower rates or increased sharing pursuant to the provisions of USWC's incentive regulation plan. Since Washington ratepayers have already benefited by reduced rates or additional sharing dollars from these pension credits, it is inappropriate for ratepayers to further benefit by receiving income from pension assets for which they were already reimbursed without giving the company an offsetting return on the pension asset in the ratebase. [Exhibit__(MJW-1), p. 12]

These alleged benefits are said to have resulted from the recording of pension credits or negative pension expense [Exhibit__(MJW-1), p.9], the historical exclusion of the pension asset from rate base [Exhibit__(MJW-1), p.10], and the historical reduction of rate base by the deferred income tax reserve balance associated with the pension credit [Exhibit__(MJW-1), p.11].

Q. Could you please describe the events or circumstances which gave rise to the recording of a pension asset?

A. Yes. In December 1985, the Financial Accounting Standards Board (FASB) issued Statement of Financial Accounting Standard No. 87 (FAS87) concerning employers' accounting for pension costs. Although issued in 1985, FAS87 was first effective for fiscal years beginning

after December 15, 1986, which the Company adopted for financial accounting purposes in 1987, subsequent to the Commission's order dated February 10, 1983, in Docket No. U-82-19.

Prior to FAS87, USWC recorded positive pension expense equal to the amount of its contributions to the pension fund. It is only after the adoption of FAS87 that pension expense and pension contributions began to diverge. According to information supplied by the Company, pension funding of "zero" has exceeded the level of negative pension expense determined in compliance with FAS87 by the cumulative amount of $67 million (intrastate) for the period 1987 through 1992. It is the average pension asset recorded on the Company's 1992 books and records of $63 million which USWC is seeking to include in rate base. [Exhibit__(MJW-1), p. 8-9]

Q. Since the adoption of FAS87, has the Company continued to record positive pension expense in its accounting records?

A. No. Beginning with the adoption of FAS87 in 1987, the Company began recording negative pension expense (a pension credit) instead of positive pension expense. It is several years' accumulation of this pension credit

1 which the Company represents has resulted in the pension
2 asset which USWC seeks to include in rate base.
3
4 Q. Could you briefly outline the rate base concept?
5 A. Yes. Rate base is commonly viewed as being comprised of
6 net utility asset investments used to provide service to
7 ratepayers, which have not yet been recovered from
8 ratepayers. When utility investors provide the necessary
9 funds to support these company investments, those amounts
10 are generally included in rate base to allow the
11 investors a return to which they are entitled.
12 Similarly, funds advanced, reimbursed, or otherwise paid
13 for by ratepayers are properly excludable from rate base.
14
15 With respect to the pension asset, the Company has
16 represented that its shareholders have "invested" the
17 cumulative amount by which pension funding has
18 historically exceeded the recorded pension expense,
19 thereby justifying the inclusion of those amounts in rate
20 base.
21
22 Q. How has negative pension expense resulted in a pension
23 asset?
24 A. Pension expense is normally thought of as being positive
25 (or an added cost) in determining a utility's total
26 expenses. However, as implied by the reference, negative

1 pension expense is actually recorded as a credit or a
2 decrease to total expenses. Under traditional
3 accounting, the pension credit reduces expense and
4 results in a corresponding debit or an increase to a
5 pension asset account.
6
7 Q. Since the adoption of FAS87, has the Company continued to
8 make contributions to the pension fund?
9 A. No. In 1987, USWC's pension plan became over-funded in
10 that the funding limitations of the Internal Revenue Code
11 restricted the Company from making any further tax
12 deductible contributions to the pension plan. Since that
13 time, the Company has made no contributions to the plan.
14
15 Q. Do you agree with the Company that its shareholders have
16 been harmed as a result of the recording of pension
17 credits, or negative pension expense, without any
18 corresponding reductions or withdrawals from the pension
19 fund?
20 A. No. The Company seeks to improperly combine the
21 ratemaking treatment of pension costs with its historical
22 accounting for this item as evidence that ratepayers have
23 benefited to the detriment of its shareholders. If
24 contributions to the pension fund (i.e., "zero"
25 contributions since 1987) exceed the "negative" pension
26 expense recorded, then the difference is typically

recognized as a prepayment. The assumption relied upon by the Company is that this prepayment must have been funded by its investors, since ratepayers benefit from negative expense, while investors are unable to withdraw comparable amounts from the pension fund to recover the amount of negative pension expense flowed to ratepayers.

Q. Has the Company attempted to quantify the amount of any benefits received by ratepayers as a result of the pension credits during the period 1987 through 1992?

A. Yes. According to the Company, ratepayers have benefited by approximately $27 million in reduced rates or additional sharing as a result of the pension credits. Another $4 million in ratepayer benefits are said to have occurred due to the use of the deferred income tax reserve as a rate base offset. The following information summarizes USWC's presentation of the $31 million of ratepayer benefits:

	Pension Credits			Deferred Income Tax Reserves			Total Alleged
(000's)	Rate Reductions	Additional Sharing	Total	Rate Reductions	Additional Sharing	Total	Ratepayer Benefits
1987							
1988							
1989							
1990	$ 9,567	$ 8,615	$18,182	$ 1,424	$ 1,019	$ 2,443	$20,625
1991		4,463	4,463		1,209	1,209	5,672
1992		3,549	3,549		1,235	1,235	4,784
Total	$ 9,567	$16,627	$26,194	$ 1,424	$ 3,463	$ 4,887	$31,081
	[USWC Exhibit__(MJW-13 and 14)]			[USWC Exhibit__(MJW-15 and 16)]			

1 Q. Do you agree that these calculations accurately portray
2 the benefits received by ratepayers as a result of the
3 pension credits?
4 A. No, I do not agree with these calculations for several
5 reasons. First, the Company's calculations include an
6 estimate of the amount of negative pension expense
7 included in the cost of service underlying the 1990 rate
8 reduction. This rate reduction was the product of a
9 negotiated settlement providing for a $65 million initial
10 year rate decrease and the introduction of the AFOR plan.
11 There is no finding of fact which supports the $9.5
12 million of negative pension expense attributed to the
13 1990 rate reduction. Rather, this pension expense amount
14 was obtained from Company workpapers in that case.
15 [Public Counsel Data Request Nos. 64 and 74]
16
17 In addition, USWC adopted FAS87 in 1987 and could have
18 negotiated for the rate base inclusion of the $25 million
19 (intrastate) pension asset for sharing purposes, which
20 existed at the beginning of 1990. At the time of these
21 negotiations, Public Counsel would have preferred more
22 favorable sharing terms, but the resolution of the
23 Commission's complaint pending at that time was
24 negotiated as a package.
25
26

1 Second, I do not believe that it is possible to
2 accurately quantify the accumulated net pension
3 recoveries from or benefits provided to ratepayers. In
4 order to prepare such a calculation, it is my opinion
5 that it would be necessary to reconcile the amount of
6 actual pension costs recovered from ratepayers with the
7 amounts actually contributed to the pension fund since
8 the establishment of the pension plan. Such a
9 quantification would be significantly complicated by the
10 fact that the level of pension costs charged to expense
11 over the years does not necessarily equate to the amount
12 of pension costs recovered from ratepayers or contributed
13 to the pension plan.
14
15 Third, the Company's pension plan and pension accounting
16 have existed for decades. By starting the analysis in
17 1990, the Company has excluded a substantial portion of
18 the history which underlies the pension fund, pension
19 accounting and cost of service considerations from this
20 calculation. Assuming that net recoveries from
21 ratepayers can be accurately quantified, the Company
22 inappropriately started the analysis in 1990, the initial
23 year that the sharing plan was adopted. Even if a number
24 of the Company's assumptions were adopted, corrections
25 were recognized and the quantification was extended only
26 a few years further into the past, the information would

1 indicate that ratepayers have provided far more pension
costs through rates than have been contributed to the
3 pension plan. Such a calculation leads to further
4 questions as to whether rate base should be reduced,
5 rather than increased as proposed by the Company.
6
7 Fourth, the Company has sought to include the full
8 pension asset in rate base even though its own
9 calculations do not demonstrate that 100% of the pension
10 credits have been flowed through to ratepayers.
11 According to USWC's calculations, the cumulative
12 ratepayer benefits total about $31 million, while the
13 Company's proposed addition to rate base is $63 million.
14
Fifth, the Company appears to have selectively proposed
16 only one modification to rate base. In a pending Arizona
17 rate case, USWC has similarly included a pension asset in
18 rate base, but has also proposed to recognize a rate base
19 reduction for an OPEB liability and a deferred rent
20 offset.
21
22 Q. Why did you conclude that the quantification of benefits
23 inappropriately began in 1990?
24 A. The ratemaking treatment of pension credits or pension
25 expense did not commence in 1990 with the initiation of
26 the AFOR sharing plan. In fact, the first entry to

record the pension asset which USWC now proposes to include in rate base began in 1987. If the intent of the Company's testimony was to demonstrate the alleged benefits received by ratepayers as a result of FAS87, the the quantification should have at least commenced with 1987.

However, even starting the calculation in 1987 would still only represent a small part of the overall history of pension accounting and regulatory recovery. In many situations, it may be possible to clearly point to an occurrence or event and establish whether the ratepayer or investor has paid for or benefited from a particular transaction. However, in this case, it is my opinion that the overall evidence does not support the Company's contention that shareholders have advanced the excess pension funds.

Q. Since FAS87 was adopted by the Company in 1987, why is it necessary to consider any information prior to 1987?

A. The Company has alleged that costs are recovered from ratepayers as expensed and that the ratepayers have benefited to the detriment of its shareholders by solely examining the period from 1990 through 1992. The current situation with regard to negative pension expense has a

1 substantial historical context which, if ignored, could
2 lead to inappropriate conclusions.
3
4 Prior to FAS87, the pension costs charged to expense and
5 capital accounts were equal to the pension fund
6 contributions made by the Company. Subsequent to FAS87,
7 the Company has recorded negative pension expense and
8 made no fund contributions. In order to establish
9 whether ratepayers have inappropriately benefited to the
10 shareholders detriment, neither the act of recording
11 expense nor making contributions necessarily establish
12 the amount that ratepayers have "invested" in or
13 "benefited" from pension expense through the cost of
14 service.
15
16 Pension funding is basically determined from an initial
17 comparison of the pension plan assets with the expected
18 pension liability. The pension plan assets are comprised
19 of prior contributions to the fund plus the actual
20 returns received on the plan assets. Once the plan
21 assets exceed the expected liability and meet certain
22 provisions of the Internal Revenue Code, the plan is
23 considered overfunded and no further tax deductible
24 contributions can be made. However, the plan assets have
25 accumulated over a very long period of time, not just the
26 last three or four years.

1 Since the adoption of FAS87, the Company has been
2 recording a negative pension expense primarily due to the
3 pension fund's favorable investment experience and an
4 increase in the actuarial rates of return. It is these
5 stellar returns that have primarily contributed to the
6 negative pension expense being recorded by the Company
7 since 1987. [Public Counsel Data Request Nos. 32 and 39]
8
9 In order to establish that ratepayers have improperly
10 benefited to the shareholders detriment, it is my opinion
11 that the Company would need to clearly demonstrate that
12 the amount of funds collected from ratepayers through the
13 cost of service were fully contributed to the pension
14 plan. If that were the case, then the earnings on 100%
5 of the pension costs recovered from ratepayers would have
16 primarily resulted in the negative pension expense. To
17 the extent that ratepayers received any benefit from the
18 negative pension expense, the shareholders would have
19 been harmed by not being able to withdraw comparable
20 amounts from the pension plan.
21
22 Q. Isn't this argument similar to the Company's presentation
23 on this issue?
24 A. This is similar to the Company's argument, but with two
25 major differences. First, USWC has provided only a
26 short-term comparison of pension expense and pension

1 funding. Second, the Company has effectively assumed
2 that pension expense equates to ratepayer recoveries.
3 While this theory has some limited application since the
4 implementation of sharing, it does not necessarily apply
5 over the long term. The Company has not clearly
6 demonstrated that the overall cumulative amount of
7 pension cost recovered from ratepayers through the cost
8 of service over the long term was, in fact, fully
9 contributed to the pension plan. To "prove" shareholder
10 harm, a long term analysis comparing rate recoveries to
11 pension fund contributions would be required.
12
13 Q. How does the amount of pension costs included in cost of
14 service compare to the actual pension contributions and
15 pension expense/credits recorded by the Company over a
16 longer period of time?
17 A. While the Company has attempted to argue that "USWC
18 recovers pension costs from its ratepayers when they are
19 expensed" [Exhibit__(MJW-1), p. 12] to support including
20 the pension asset in rate base, the amount of pension
21 expense actually recorded by the Company varies
22 significantly from both the actual amount of pension
23 contributions and the level of pension costs theratically
24 included in the cost of service and sharing calculations.
25 The following comparison illustrates the potentially
26 extreme differences in these amounts:

[millions]	Washington Intrastate			
	Actual Amount Funded	Recorded Expense@@	USWC Alleged Ratepayer Benefits	Cost of Service @
1983	$ 26.0 #	$ 23.6	$	$ 40.3
1984	20.6 #	17.5		40.3
1985	21.6 #	18.4		40.3
1986	16.8 #	14.3		40.3
1987	0	(4.1)		15.5
1988	0	(3.4)		(2.2)@
1989	0	(13.4)		(2.2)@
Subtotal (Pre-sharing)	85.0	52.9	0	172.3
1990	0	(19.9)	(20.6)	(13.7)@
1991	0	(10.3)	(5.7)	(10.0)@
1992	0	(7.9)	(4.8)	(9.1)@
Total	$ 85.0	$ 14.8	$ (31.1)	$ 139.5

[Public Counsel DR Nos. 1, 33, 34 & 60]

Expense and capital portions - REVISED Public Counsel DR No. 60.

@ See Exhibit__(SCC-3) and Public Counsel DR No. 34.

@@ Public Counsel DR No. 60 and Staff DR No. 33 - REVISED.

Even though this comparison indicates that ratepayers have received some benefit through the cost of service as a result of the pension credit (i.e., negative pension expense) during 1988-1992, it does not demonstrate that ratepayers have received benefits totaling $67 million (intrastate) that has harmed the Company's shareholders. The $139.5 million of pension expense theoretically included in the cost of service actually exceeds the total amount funded since 1983 by approximately $54.5 million (i.e., $139.5 million minus $85.0 million).

1 Q. Why did you start the above comparison with the year
1983?
3 A. The year 1983 represents the year in which the rate order
4 immediately preceding the adoption of FAS87 was
5 implemented. By starting with 1983 to compare expense,
6 funding and cost of service levels, it is possible to
7 examine how closely the cost of service allowance for
8 this item has followed the amount of pension costs the
9 Company has charged to expense. As shown by this
10 comparison, these amounts do not "track" at all. In
11 fact, a case could be made that a pension liability was
12 "owed" ratepayers throughout this time period.
13
14 Q. Do you believe that all elements of the cost of service
included in past rates should be reconciled with current
16 cost levels to determine prospective rate treatment for
17 each item?
18 A. No. As a matter of ratemaking policy, I do not recommend
19 that the Commission rely solely on past decisions in
20 establishing cost of service. However, it is my opinion
21 that the above comparison of funding, expense and cost of
22 service levels is indeed relevant in demonstrating the
23 Company's failure to meet its burden to establish that
24 ratepayers have been unjustly rewarded at shareholder
25 expense.
26

If the funded status and related earnings of the pension plan were created solely with shareholder moneys, I could understand the Company's concerns on this issue. On the other hand if ratepayers are assumed to have funded more than the Company's past pension contributions, then the inclusion of the Company's "pension asset" in rate base will improperly charge ratepayers a return on a portion of the very funds they have already provided to the Company and would result in a windfall to USWC's investors. As shown by the above comparison, the Company's ratepayers appear to have provided more pension costs than have been funded since 1983. For these reasons, the Commission should reject the Company's rate base request.

Q. How did you determine the amount of pension costs included in the cost of service during this period?

A. In response to Public Counsel Data Request No. 34, USWC provided the amount of pension costs included in cost of service beginning with the rate case immediately preceding the Company's adoption of FAS87, as follows:

Docket #	Order Date	Cost of Service Pension Expense
U-82-19	2/10/83	$40.3 million
U-85-52	5/27/87	(2.2) million
U-89-2698-F & U-89-3245-P	1/16/90	(9.4) million

[Public Counsel Data Request No. 34 & 64]

1 As noted previously, the 1990 rate reduction was the
2 result of a negotiated settlement, as was the case
3 ordered in 1987. While I do believe it is neither
4 possible nor appropriate to attempt to delve into the
5 cost of service components comprising a negotiated
6 settlement, I nevertheless assumed that the Company's
7 response to the referenced discovery was reasonably
8 accurate in estimating the cost of service for the
9 limited purpose of illustrating the amount of pension
10 expense which may have been theoretically included in the
11 cost of service since 1983.
12
13 Q. Why are USWC's quantified ratepayer benefits and the cost
14 of service amounts you have identified significantly
15 different for the period 1990-1992?
16 A. Besides failing to demonstrate that the ratepayers have
17 received any overall benefit to the detriment of the
18 Company's shareholders, the Company has improperly
19 accounted for the interaction of base rates with the
20 sharing plan in quantifying the amounts for these years.
21 The Company's presentation assumes a one-time $9.5
22 million rate reduction in 1990 with the full amount of
23 the annual pension credits flowing through the sharing
24 plan in 1990, 1991 and 1992. This quantification
25 approach is flawed.
26

A rate reduction did occur in 1990, but the lower base rates have remained in effect throughout this entire time frame, not just 1990. Assuming the accuracy of the $9.4 million of negative pension expense the Company estimated for the negotiated settlement, the cost of service associated with the 1990 rate reduction [Public Counsel Data Request No. 34] has remained embedded in base rates since that time. Only the net change between this amount and the pension credit recorded each year during the period 1990-1992 would have theoretically flowed through the sharing calculation.

By modifying the calculations to recognize this change in the base rate versus sharing treatment, the earlier comparison would indicate that ratepayers have participated in approximately $33 million rather than the Company's $31 million of pension credits since 1990. However, as I indicated previously, it is inappropriate to rely on such a limited period of time in order to attempt to draw conclusions as to which party has benefited to whose detriment.

Q. You previously indicated that USWC has sought to include the entire pension asset balance in rate base even though the Company's own quantifications have not demonstrated

that 100% of these benefits have been flowed through to its ratepayers. Would you please explain this statement?

A. Yes. While I disagree with the Company's calculations, USWC has represented that ratepayers have received approximately $31 million in benefits as a result of the pension credits. Even if the Commission were to rely on this calculation, there is a very wide margin which exists between the $67 million year-end, or $63 million average, 1992 pension asset balance [Public Counsel Data Request No. 43] and the $31 million of ratepayer benefits quantified by the Company.

If ratepayers have not received the balance of these credits, then they must have been retained by the Company's shareholders. In the event that the Commission were to conclude that some amount of pension asset should be included in rate base, it would be totally inappropriate to include therein any benefits retained by the Company's shareholders. Such treatment would unnecessarily penalize the Company's ratepayers to the benefit of its shareholders.

Q. You previously indicated that one component of ratepayer benefits cited by USWC in support of including the pension asset in rate base is the fact that, historically, the pension asset has not been included in rate base while rate base was reduced by the related

1 deferred income tax reserve balance. In your opinion,
2 does this justify the Company's proposal that the 1992
3 sharing plan should be modified to include the pension
4 asset in rate base?
5 A. No. The existence of a pension asset on the Company's
6 accounting records is not a phenomenon that arose for the
7 first time in 1992. Referring to the responses to Public
8 Counsel Data Request Nos. 42 and 61, the Company has
9 recorded a pension asset since 1987. As of the beginning
10 of 1990, the intrastate pension asset balance was
11 approximately $24.9 million while the related deferred
12 income tax reserve as about $9.3 million.
13
14 Q. Why hasn't the Company previously sought to include a
15 pension asset in its regulated rate base for ratemaking
16 purposes?
17 A. The Company has indicated that rate base inclusion of the
18 pension asset had not been sought as the pension credits
19 were not expected to continue on an annual basis.
20 However, the Company decided to seek rate base treatment
21 in 1992 due to its increasing significance. [Public
22 Counsel Data Request No. 45] Nevertheless, USWC had not
23 been precluded from attempting to negotiate the inclusion
24 of a pension asset in rate base.
25
26

However, it is my opinion that the Company has not presented sufficient evidence clearly demonstrating that it is the shareholders, not the ratepayers, who have advanced the excess pension amounts. Instead of including the pension asset in rate base, it is my recommendation that the deferred income tax reserves be eliminated from the rate base offset.

Q. You also indicated that the rate base modification to eliminate the deferred income tax reserves should commence in 1993, not 1992 as requested by the Company. Why is that?

A. It is my opinion that the deferred income tax reserve modification should only be implemented on a prospective basis beginning in 1993. Since the prior sharing calculations including 1992 were based on the past regulatory practices of this Commission to which USWC did not previously object, the 1990-1992 sharing calculations reasonably relied on uncontested past ratemaking methods. Clearly, nothing has prohibited the Company from raising this issue in 1988 or any subsequent year. As such, I do not believe that the 1992 sharing amounts should be retroactively adjusted at this time.

BEFORE THE WASHINGTON UTILITIES & TRANSPORTATION COMMISSION

WUTC v. VERIZON

DOCKET NO. UT-040788

DIRECT TESTIMONY OF STEVEN C. CARVER (SCC-1T)

ON BEHALF OF

PUBLIC COUNSEL, AARP AND WEBTEC

THIS DOCUMENT IS THE NON-CONFIDENTIAL VERSION OF THIS TESTIMONY PURSUANT TO THE PROTECTIVE ORDER IN THIS DOCKET.

November 22, 2004

V. FAS87 PENSION ASSET

Q. Should the Commission adopt Verizon's proposal to include the pension asset in rate base?

A. No. Exhibit SCC-8 represents Consumers adjustment eliminating Verizon's proposed inclusion of the pension asset in rate base. This adjustment also removes the related accumulated deferred income tax reserve from rate base.

Q. Have you addressed this issue in past rate proceedings?

A. Yes. I have sponsored testimony in various jurisdictions opposing the inclusion of a pension asset in rate base, including:

Jurisdiction	Case / Docket	
Arizona Corporation Commission	E-1051-93-183	(a)
	T-1051B-99-105	(a)
	T-1051B-03-0454	(c)
Public Utilities Commission of Hawaii	94-0298	(e)
Oklahoma Corporation Commission	PUD 001151	(d)
Utah Public Service Commission	97-049-08	(a)
Washington Utilities and Transportation Commission	UT-930074	(b)

Note (a): Qwest Corp. rate case.
Note (b): Qwest Corp. AFOR – sharing.
Note (c): Qwest price cap review.
Note (d): Oklahoma Natural Gas.
Note (e): GTE Hawaiian Telephone.

Q. In the proceedings identified in this table, did you recommend the complete elimination of the pension asset from rate base?

A. Yes, except for the most recent Arizona proceeding (ACC Docket No. T-1051B-03-0454). In the remaining dockets, my pension asset analysis was similar to the analysis prepared in the current proceeding and resulted in recommendations excluding the pension asset from rate base. However, in the recent Qwest proceeding in Arizona, the

1 update of my earlier analyses did support, for the first time, the inclusion of the pension
2 asset in rate base. Absent a demonstration that ratepayers had materially participated in
3 the cumulative pension credits comprising the pension asset, my analyses have fairly
4 consistently questioned whether the alleged benefits were instead enjoyed by investors,
5 not ratepayers.

6 **Pension Cost Accounting**

7 **Q. Please describe the events or circumstances giving rise to the pension asset.**

8 A. In December 1985, the Financial Accounting Standards Board ("FASB") issued
9 Statement of Financial Accounting Standards No. 87 ("FAS87"), concerning employers'
10 accounting for pension costs. FAS87 was effective for fiscal year beginning after
11 December 15, 1986, for financial accounting purposes. Prior to FAS87, the amount of
2 pension costs distributed to expense and capital accounts was equal to the level of
13 contributions actually made to the pension fund. After the adoption of FAS87, pension
14 costs expensed/ capitalized and pension contributions began to diverge. Since the
15 adoption of FAS87, Verizon has recorded negative pension costs (a pension credit)
16 instead of positive pension costs since at least 1993.[8] The pension asset balance
17 represents the accumulation of those pension "credits".

18 **Consumers Approach**

19 **Q. Could you briefly outline the rate base concept?**

20 A. Rate base is commonly viewed as being comprised of net utility asset investments used
21 and useful in providing service to customers. When investors provide the funds

8 According to Verizon's responses to Data Request PC-128 and PC-261. Thus far, Verizon has been unable to produce pension cost information prior to 1993.

necessary to support these company investments, those amounts are generally included in rate base, allowing investors an opportunity to earn a return on invested capital. Similarly, funds advanced, reimbursed, or otherwise paid for by customers are properly excluded from rate base.

The direct testimony of Company witness Heuring (page 27) only makes passing reference to the inclusion of the pension asset in Verizon's rate base. However, the most succinct explanation of Verizon's rationale for rate base inclusion was provided in response to Data Request PC-215(b), as follows:

> Yes. The Company has passed back to the ratepayers the benefit of the FAS 87 accounting change and the performance of the pension fund assets by reducing its cost of service over the years through the recording of a pension expense credit on its books. The ratepayer has received the full benefit of reduced reported operating expense over the years, while the Company has suffered an annual outlay of cash that has no other valid way of being recognized. As such, the Company is seeking to earn a fair return on these financial resources which have been so committed. If the pension expenses had not been substantially reduced since 1987, the need for rate relief would have been more acute. In addition, as shown in the corrected response to PC-131, the ratepayers benefited from the negative pension cost associated with the rate reduction ordered in Docket UT-991164.
>
> In Docket No. UT-950200, the Commission accepted US West's position that the pension asset should be included in the rate base. "All of the return earned in the fund is used to reduce the need for further investment by the Company, and thus it works to reduce the pension expense." [Data Request PC-215(b)]

Q. Does the mere existence of pension credits result in an automatic and substantial decrease to the cost of service benefiting ratepayers?

A. No. Under traditional utility regulation, utility rates are based on a test year cost of service, theoretically designed to balance the various components of the ratemaking equation. Once determined, those rates are generally considered just and reasonable until

1 a moving party presents evidence that the utility is materially under, or over, earning the
2 authorized return in support of revised rates. In general terms, the utility is considered to
3 have recovered all costs recorded between rate cases and achieved a reasonable return on
4 its rate base investment.

5 However, it is not uncommon for regulators to be presented with various issues
6 associated with accounting changes (e.g., transition from pay-as-you-go to FAS106
7 accrual accounting for OPEB costs, adoption of FCC Part 32 capital to expense shifts),
8 cost deferrals (e.g., storm damage, demand-side management costs), amortization
9 requests (e.g., depreciation reserve deficiency, workforce reduction program costs) or
10 tracking mechanisms (fuel adjustment clause) that deviate from this general framework.
11 If the mere recording of a transaction meant that ratepayers symmetrically funded
2 increases and benefited from decreases in expense, there would seem to be no need for
13 the many deferral, cost tracker or amortization issues that arise in utility regulation. The
14 fact is that such issues do arise and have existed for many years. Rather than
15 dismissively reject these requests, regulators typically review the facts and circumstances
16 unique to each situation and determine whether the regulatory treatment requested by the
17 utility should be accepted, rejected or modified.

18 The pension asset is no different. While negative pension credits have been
19 recorded by some utilities since the late 1980's, the question is whether Verizon's
20 Washington ratepayers have adequately participated in the reduced expense to support
21 rate base inclusion of the pension asset. In other words, have negative pension costs been
22 included in the cost of service or somehow separately flowed through to customers "as
3 recorded" each year since the adoption of FAS87? If the ratepayers are not the

1 beneficiaries of those pension credits, then the Company and its investors are the only
2 remaining parties that could have benefited from the cost reductions through higher
3 earnings than would have otherwise been achieved.

4 While Verizon has alleged that the Company "has suffered an outlay of cash that
5 has no other valid way of being recognized", but for rate base inclusion of the pension
6 asset, Verizon has provided no factual support that a cash "outlay" has indeed occurred in
7 support of the proposed pension asset treatment. Rate base inclusion is appropriate only
8 if it is reasonably demonstrated that a comparable level of cumulative pension credits
9 have been flowed through to the benefit of Verizon's Washington ratepayers.

10 **Q. Do you believe that ratepayers receive the benefit of pension credits merely as a**
11 **result of recording the negative pension costs?**

2 A. No. The mere act of recording costs or credits does not conclusively demonstrate "who"
13 may have funded, or benefited from, the pension credits. Since Verizon has sought rate
14 base treatment of the pension asset, the Company should bear some burden to
15 demonstrate that such inclusion is proper. When rate base inclusion is premised on the
16 "as recorded" concept (i.e., the company recorded credits so ratepayers have benefited) or
17 the "cash outlay" concept (i.e., somehow translating a non-cash accrual entry into an
18 expenditure of cash), I disagree with reliance only on those theories for determining
19 ratepayer <u>benefit</u> and rate base inclusion. Absent some attempt to assess ratepayer
20 participation in those cumulative pension credits, Verizon's rate base proposal would
21 charge ratepayers with a rate base return on funds they may have never received –
22 unnecessarily benefiting Verizon and its investors.

3 **Q. Does Verizon concur that the pension credits have resulted in higher earnings?**

A. Yes. Data Request PC-215(e) sought confirmation that the Company agreed that the recording of negative pension costs pursuant to FAS87 had the cumulative effect of increasing Verizon's net operating income above levels that would have been realized absent FAS87. The Company responded as follows:

> The pension asset balance is the accumulation of the recording of net pension income since the adoption of FAS 87 that has resulted in the Company increasing its net operating income.

Q. By attempting to assess ratepayer participation in the pension credits recorded by the Company over the years, are you suggesting that the Commission engage in retroactive ratemaking?

A. No, absolutely not. I do not propose or suggest that Verizon should pay back past excessive profits or recoup past operating losses, as implied by that concept. Instead, the retrospective analysis or review that I propose would solely be used to gauge the extent of benefits received by ratepayers or retained by investors in determining whether the pension asset balance is includable in rate base.

Q. Please explain.

A. Prior to FAS87, the pension costs charged to expense/capital accounts and contributed to the pension fund were equal. Subsequent to FAS87, the Company has recorded negative pension costs, since at least 1993,[9] and has made no pension fund contributions, since **[CONFIDENTIAL BEGINS]** ****.**CONFIDENTIAL ENDS]** [10] In order to establish whether ratepayers have inappropriately benefited to the investors' detriment, neither the

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9 According to the response to Data Requests PC-128 and PC-261, Verizon has been unable to locate any accounting records showing the amount of any pension costs recorded during calendar years 1987-1992.

10 Verizon's confidential responses to Data Request PC-129 and 130, indicate that the last pension contributions were made in **[CONFIDENTIAL BEGINS]** **********. **[CONFIDENTIAL ENDS]** No contributions are expected in 2004.

act of recording costs nor making contributions necessarily establish the pension cost amount ratepayers have "invested" in or "benefited" from through cost of service.

In assessing whether these pension credits have inured to the benefit of ratepayers to the detriment of investors, Verizon would need to demonstrate that the cumulative pension credits reasonably flowed through to its Washington intrastate customers equal or exceed the pension asset it proposes to include in rate base. If analytical results cannot demonstrate substantial ratepayer benefits, Verizon's proposal to include the pension asset in rate base should be rejected.

Q. Has your approach been used for any other element of rate base?

A. No, it has not. However, such a criticism fails to address the key points of concern relative to this issue:

- Have ratepayers benefited from the pension credits?
- If so, by how much?
- Is the cumulative extent of any benefits enjoyed by ratepayers sufficient to include the pension asset in rate base?

The implementation of FAS87 resulted in a significant shift in accounting method from a cash basis to an accrual basis – a shift implemented by the Company for accounting purposes outside the context of a rate proceeding.[11] This shift resulted in Verizon recording negative expenses (i.e., pension credits) since at least 1993. Because the existence of these pension credits are the sole cause of a pension asset being recorded, I believe that it is responsible and reasonable for regulators to question the extent to which

11 The original response to Data Request PC-131 indicated that the Company's "last formal rate review" was in 1983, Docket Nos. U-82-12 and U-82-48.

1 ratepayers, not the Company and its investors, have enjoyed the benefits of those annual
2 pension credits.[12]

3 All components of the ratemaking equation change over time – revenues,
4 expenses and investment. As each component changes, a utility should have a reasonable
5 opportunity to achieve its authorized return (i.e., not materially over or under earn), so
6 long as the components remain in relative balance or changes to one component are
7 mitigated or offset by changes to the others. I generally agree that the prohibition against
8 retroactive ratemaking presumes that recorded costs are assumed to be recovered,
9 regardless of explicit inclusion in cost of service. This presumption holds the utility
10 accountable for incurred costs and prevents a potentially abusive process of collecting
11 past earnings deficiencies from current and future ratepayers.

2 Since adoption of FAS87, the amount of pension credits recorded by Verizon has
13 varied significantly from year to year.[13] In the absence of rate case activity or some
14 mechanism to flow the volatile annual pension credits through to benefit ratepayers,
15 FAS87 pension accounting may have resulted in large pension credits increasing utility
16 income and investor returns. Contrary to implications otherwise, the evaluation of this
17 issue is <u>not</u> designed, intended nor does it result in a retrospective inquiry of past earnings
18 to impose a surcharge for past under-recoveries or a refund for past over-recoveries.
19 Instead, my approach is designed to evaluate, based on available information, whether it
20 is reasonable to assume that ratepayers have sufficiently enjoyed the benefits of the ever
21 fluctuating pension credits (supporting rate base inclusion of some portion of the pension

12 See discussion of the "benefit-burden test" in the incentive compensation testimony section.
13 The amount of annual pension credits recorded since 1993 have ranged from about $(6.9) million to $(14) million, before jurisdictional separation – Verizon non-confidential response to Data Request PC-128.

1 asset) or whether the resulting earnings benefits have been retained by investors
2 (supporting the rate base exclusion). Exhibit SCC-5C compares the annual pension
3 credits for the periods for which available information has been provided.

4 **Q. Since Verizon's adoption of FAS87, how does the amount of pension costs included**
5 **in cost of service compare to the pension credits recorded by the Company?**

6 A. Although it is not possible to precisely quantify the amount of accumulated net pension
7 recoveries from or benefits provided to ratepayers over the decades predating or
8 following the adoption of FAS87, I have prepared a series of calculations which attempt
9 to estimate the level of pension credit benefits ratepayers might have received since the
10 adoption of FAS87. Relying on Company's responses to Data Requests PC-131 and PC-
11 262, the last formal rate review in Washington occurred in 1983 (WUTC Docket Nos. U-
12 82-45 and U-82-48). Since the adoption of FAS87, Verizon identified a series of rate
13 reductions implemented in 2000 and 2001 that did not result from a fully litigated or
14 formal rate review proceeding.[14] According to the corrected response to Data Request
15 PC-131, Verizon's financial results for calendar year 1998 served as the basis for Staff's
16 informal review, which included pension credits of about $7.9 million, before
17 jurisdictional separation, or $5.3 million intrastate.[15]

18 Based on this information, Exhibit SCC-6 represents an analysis of the net
19 pension credits that might have been flowed through to ratepayers, under several
20 conservatively generous assumptions. First, this analysis assumes that 100% of the
21 pension credits recorded in 1998 was directly flowed through to the benefit of ratepayers

14 Docket No. UT-991164 (informal earnings-review investigation initiated by WUTC Staff), UT-981367 (Verizon merger) and UT-990672 (access charge complaint) were resolved by an "omnibus" Settlement Agreement that resolved all three dockets and implemented a four-step rate reduction: $7 million by May 1,

1 via the 2000-2001 rate reductions. Second, although it is likely that the 1983 rate case
2 would have included positive pension expense, this analysis assumes "zero" pension
3 expense in all calendar years prior to 2000 – the first year of the four-step rate reductions.
4 Finally, Exhibit SCC-6 assumes that the negative pension costs included in the 1998
5 financials would continue to flow through to the benefit of ratepayers until the "next" rate
6 case, which is the current proceeding. Such conservative assumptions would indicate that
7 ratepayers may have received no more than $15.5 million cumulative pension credits, as
8 compared to the negative $138 million of cumulative pension credits, gross of
9 accumulated deferred income tax reserves, Verizon proposes to include in rate base.

10 **Q. Why have you characterized these assumptions as "conservatively generous"?**

11 A. It may not be possible to accurately or precisely quantify the exact amount of cumulative
net pension recoveries from or benefits provided to ratepayers, particularly over the
13 decades predating the adoption of FAS87. However, it is reasonable to consider all
14 relevant information available to assess regulatory intent and estimate the amount of
15 cumulative pension credits that might have been reasonably flowed through to the benefit
16 of ratepayers, in the context of Verizon's proposed rate base treatment and theories
17 regarding the flow through of those pension credits to ratepayers. The assumptions
18 underlying Exhibit SCC-6 are conservatively generous in that, in the aggregate, they
19 maximize the cumulative value of pension credits provided to ratepayers.

20 If any positive value is assigned to the pension cost included in the 1983 rate
21 proceeding, the amounts shown for years 1987-1999 would increase above "zero",
22 resulting in the cumulative pension credits approaching "zero" and possibly swinging

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2000; $8 million by July 1, 2000; $8 million by January 1, 2001; and $7 million by July 1, 2001.

1 positive. Similarly, if only a portion of the $5.3 million intrastate pension credits
2 recorded in 1998 is attributed to the 2000-2001 rate reductions, the cumulative pension
3 credits would also approach "zero". As a consequence, the $15.5 million of cumulative
4 pension credits set forth on Exhibit SCC-6 represents a maximum credit value –
5 conservatively and generously.

6 Under alternative assumptions, it is reasonable to expect that the cumulative
7 amount could be positive, not negative, given the regulatory history and cost information
8 unique to Verizon's Washington operations. In any event, Exhibit SCC-6 supports
9 cumulative pension credits of only $15.5 million, far short of the Company's $138
10 million pension asset, indicating that ratepayers have not yet received substantial
11 cumulative benefits from the pension credits to support rate base inclusion of the pension
2 asset. Therefore, the Commission should reject Verizon's proposed rate base treatment.

13 **Q. Exhibit SCC-6 relies on a series of rate reductions implemented in calendar years**
14 **2000 and 2001 that resulted from a negotiated settlement. Have you previously filed**
15 **testimony that you were unable to determine what amount of pension credits may**
16 **have been flowed through to ratepayers as a result of the settlement process?**

17 A. Yes. I have taken the position that, in assessing the amount of pension credits flowed
18 through to ratepayers, only those orders which specifically address the various
19 components of cost of service be considered. Settlements are typically non-specific, by
20 design, and entail any number of compromises in the interest of reaching an acceptable
21 resolution. By its very nature, a settlement agreement reflects a compromise that can

15 Verizon's response to Data Request PC-262(a).

often be valued in various ways, not necessarily reflecting the filed positions of any particular party.

However, on further reflection, the amount of pension credits included in negotiated settlements may not change, even if the rate case were litigated, provided pension cost valuations were uncontested. With regard to Verizon's specific situation, the pension credits recorded in 1998 that may have been recognized in quantifying these negotiated reductions cannot be known with certainty. However, even assuming the maximum credit does not support Verizon's rate base treatment. As a result, Exhibit SCC-6 is conservative in quantifying possible ratepayer participation in the Washington pension credits.

Q. Do you believe that all elements of the cost of service included in past rates should be reconciled with current cost levels to determine prospective rate treatment for each item?

A. No. As a matter of ratemaking policy, I do not recommend that the Commission rely solely on or otherwise reconcile past decisions in establishing cost of service for future periods. However, the consideration of past rate orders is indeed relevant in assessing whether investors have some claim to inclusion of the pension asset in rate base. As discussed above, I am not recommending the inclusion of the pension in rate base.

VI. INCENTIVE COMPENSATION

Q. Is an adjustment to the test year amount of incentive compensation expense Verizon has included in revenue requirement being proposed by Consumers?

A. Yes. In quantifying its overall revenue requirement, Verizon's revised Adjustment WP P12 appears to increase the amount of incentive compensation accrued during the test

PSO

BEFORE THE OKLAHOMA CORPORATION COMMISSION

PUBLIC SERVICE COMPANY OF OKLAHOMA

CAUSE NO. PUD 920001342

DIRECT TESTIMONY OF

STEVEN C. CARVER

On Behalf of the

Public Utility Division Staff

September 1993

1 **PENSION FUNDING ADJUSTMENT**

2

3 Q. Please identify Staff Adjustment/Schedule B-10.

4 A. Staff Adjustment/Schedule B-10 represents the reversal of
5 PSO's proposal to include a pension asset in rate base as
6 reflected on Company Schedules B-2 and H-31. Due to
7 Company's test year update to actual 1992, Staff
8 Adjustment B-10 actually reverses the updated rate base
9 value presented on Staff Adjustment B-2, line 19, Column
10 D.

11

12 Q. Could you please describe the events or circumstances
13 which gave rise to the recording of a pension asset?

14 A. Yes. In December 1985, the Financial Accounting
15 Standards Board (FASB) issued Statement of Financial
16 Accounting Standard No. 87 (FAS87) concerning employer's
17 accounting for pension costs. Although issued in 1985,
18 FAS87 was first effective for fiscal years beginning
19 after December 15, 1986, which PSO adopted for financial
20 accounting purposes subsequent to the last review of the
21 Company's rates in Cause No. PUD 000260.

22

23 According to the Company's description of this proposed
24 rate base adjustment, as contained in the direct
25 testimony of Company witness John A. Jeter and in various
26 data request responses, PSO is seeking to include in rate

1 base the cumulative amount by which the Company's actual
2 pension funding has exceeded the level of FAS87 pension
3 expense for the period 1987 through test year-end.
4
5 Q. Do you agree with the Company's proposal to include the
6 pension asset in rate base?
7 A. No.
8
9 Q. Could you briefly outline the rate base concept?
10 A. Yes. Rate base is commonly viewed as being comprised of
11 investments which have not yet been collected from
12 ratepayers, rather the Company's investors have provided
13 the necessary funds to support these investments. When
14 investors have advanced capital to support components of
15 rate base, those amounts are generally included in rate
16 base to allow the investors a return thereon. Similarly,
17 funds advanced, reimbursed, or paid for by ratepayers are
18 properly excludable from rate base. With respect to the
19 pension asset, the Company has represented that its
20 investors have provided the cumulative amount by which
21 pension funding has historically exceeded pension
22 expense, thereby <u>earning a right</u> to have those amounts
23 included in rate base.
24
25 Q. How has the Company contended that the excess pension
26 funding has been provided by its investors?

A. The following excerpt from PSO's response to Staff Data Request No. 292 clearly sets forth the Company's position that investors have funded the excess pension contribution:

> When rates are set based on inclusion of SFAS 87 expense in cost of service, rate base treatment for the excess of pension funding over SFAS 87 expense is appropriate because: (1) the customers have not funded the prepayment, the investors have; and (2) the earnings on the amounts funded in excess of SFAS 87 expense reduce future SFAS 87 expense, the customer receives those benefits. [Staff Data Request No. 292]

Company witness Jeter's direct testimony also presents a similar argument for including these funds in rate base as follows:

> Since there have been no proceedings to review the rates of PSO since the 1986 test year, PSO has clearly been appropriately recording pension costs on its books in accordance with SFAS 87. The amount PSO has funded in excess of SFAS 87 costs results in additional assets in the pension fund. The investors have funded those additional amounts. [Jeter Direct, p. 7]

Q. Do you agree with the Company that its investors have funded the excess pension funding?

A. No. The Company has merely relied on the book accounting for this item as evidence that investors, not ratepayers, have advanced the excess funding. If contributions to the pension fund exceed pension expense, then the difference is typically recorded as a prepayment. The

1 assumption relied upon by the Company is that any
2 prepayment must have been funded by its investors, since
3 the excess amount was not charged to expense. In order
4 to further support its position, the Company has
5 rationalized that, since pension expense in the Company's
6 last rate review (PUD 260) was based on GAAP and FAS87
7 accounting is also GAAP, investors clearly must be
8 "out-of-pocket" and rate base inclusion is appropriate.
9 [Staff Data Request No. 292]
10
11 In most circumstances, it is possible to clearly point to
12 an occurrence or event and establish who paid for what
13 costs. Through the utilization of lead/lag studies, it
4 is also possible to measure whether certain transactions
15 are effectively paid with investor or ratepayer supplied
16 funds. However, in this case, the Company has not
17 presented any evidence that investors have actually
18 advanced the excess pension funds other than to cite to
19 the continuation of accrual accounting from PUD 260.
20
21 Q. Was the level of pension expense included in the PUD 260
22 cost of service based on accrual accounting?
23 A. Not necessarily. According to the response to Staff Data
24 Request No. 499, the amount of pensions funded and
25 charged to expense, pursuant to APB8, were the same in
26 1985 and 1986. The PUD 260 proceeding was based on a

1986 historical test year adjusted for the funding of an early retirement window. Consequently, an argument could be made that the PUD 260 pension expense was based on an actual funding method, since the amount funded and expensed was the same. Under that scenario, the Company would have historically been collecting the amount "funded" through utility rates; therefore the excess of pension contributions over pension expense would have been supplied by ratepayers, not investors.

Q. Since the Company is representing that the PUD 260 was based on accrual accounting which justifies including the pension asset in rate base and you are presenting a similar argument that PUD 260 considered actual funding levels, how can the Commission reconcile these positions?

A. In order to clarify the Company's position on this issue, Staff Data Request No. 430 was submitted to assess whether PSO's rate base inclusion was dependent on a comparison of actual pension costs provided by ratepayers (i.e., included in the PUD 260 cost of service) with actual pension funding during the 1987-1992 period. The Company responded as follows:

> No. The level of pension costs included in test year cost of service in our last case is not relevant to our proposed inclusion of the pension funding adjustment in rate base.

> In Cause No. PUD 000260, pension costs were included in cost of service based on APB 8 which was GAAP at the time. In 1987, SFAS 87 became effective. Absent a specific directive or order, PSO is required to follow GAAP, as are all regulated entities. The $12.9 million represents the cumulative amount of pension funding that has been in excess of pension costs calculated in accordance with GAAP.
>
> Prices are set on a test year basis. Therefore, a utility does not track individual levels of expenditures incurred against amounts included in prices unless directed by and/or discussed with regulators. Pension cost is one example of an item included in test year cost of service that has decreased since 1986. However, there are several costs included in test year cost of service that have increased such as depreciation (based on existing depreciation rates) and ad valorem taxes. [Staff Data Request No. 430]

Generally, I agree with the Company that it is not appropriate to reconcile specific components of cost included in past rate orders with subsequent costs incurred. In fact, I will address this matter in a subsequent testimony, concerning PSO's requested storm damage allowance, arguing that it is improper to allow utilities to engage in retroactive or piecemeal ratemaking, simply because expenses were incurred which had not been specifically considered in determining existing rate levels.

In my opinion, this same theory applies to this excess pension funding issue. While the Company has not attempted to specifically identify dollars included in

the last cause, it has attempted to construct a theory predicated on its view of the accounting framework underlying the last rate proceeding to support its rate base position in this case. Nevertheless, the Company has not presented any evidence clearly demonstrating that it is the investors, not the ratepayers, who have advanced the excess pension amounts.

Q. How does the PUD 260 pension expense compare to actual pension fund contributions since that time?

A. The Company's primary position on this issue appears to rely on the consistent use of accrual accounting to determine pension expense subsequent to and including the PUD 260 test year. The following information compares the pension cost included in PUD 260 with subsequent funding levels, which illustrates the problem raised by PSO's position on this issue:

	Actual Amount Funded	PUD 260 Expense	Funding Difference	FAS 87 Cost	PSO Funding Difference
1987	$7,219,387	$ 6,606,164	$ 613,223	$ 7,146,320	$ 73,067
1988	6,838,724	6,606,164	232,560	5,619,438	1,219,286
1989	6,641,132	6,606,164	34,968	5,031,000	1,610,132
1990	6,638,954	6,606,164	32,790	3,866,000	2,772,954
1991	4,171,607	6,606,164	(2,434,557)	1,565,333	2,606,274
1992	5,856,000	6,606,164	(750,164)	1,283,000	4,573,000
Total	$37,365,804	$39,636,984	$(2,271,180)	$24,511,091	$12,854,713

[Staff Data Request Nos. 23, 291 and 499]

Although the PUD260 rate order was not effective until late September, 1987, this comparison would appear to

1 indicate that ratepayers may have provided more than the
2 amount PSO has contributed to the pension fund during
3 this period of time. While I am not recommending that
4 the Commission's decision in the current cause be based
5 on past cost levels, it is my opinion that the above
6 comparison is indeed relevant in further demonstrating
7 PSO's failure to meet its burden of proof to establish
8 that ratepayers have not effectively contributed the
9 excess pension funding. If the ratepayer is the source
10 of the funds, then the inclusion of the Company's
11 "pension asset" in rate base will improperly charge
12 ratepayers a return on the very funds they have already
13 provided and will result in a windfall to PSO's
14 investors. For these reasons, the Staff recommends that
15 the Commission reject PSO's rate base request.
16
17 Q. You previously indicated that the pension amount included
18 in PUD 260 included consideration of an early retirement
19 window. Could you explain how that adjustment would be
20 consistent with your point that the amount of PUD 260
21 expense could be argued to have been based on an actual
22 funding method?
23 A. Yes. The actual pension fund contributions during the
24 period 1987-1990 included $2,506,239 annually which was
25 related to the funding of the early retirements taken
26 under a specific early-out program offered by PSO. [Staff

Data Request No. 499] By recognizing the impact of funding the early retirement in the 1986 test year, PUD 260 had the effect of including this additional contribution in operating expense as a known and measurable change.

Referring to the above cost comparison, it is interesting to note that the actual amount funded for the years 1987-1990 included this $2.5 million which comprises approximately $10 million ($2,506,239 times 4 years) of PSO's excess funding amount of $12.9 million. Since this amount was specifically included in the PUD 260 cost of service and recovered annually from ratepayers, it would appear that at least 78% ($10 million divided by $12.9 million), if not more than 100%, of the funds PSO has included in rate base may have been supplied by ratepayers, not investors.

BEFORE THE OKLAHOMA CORPORATION COMMISSION

PUBLIC SERVICE COMPANY OF OKLAHOMA

CAUSE NO. PUD 960000214

DIRECT TESTIMONY OF

STEVEN C. CARVER

On Behalf of the

Attorney General - State of Oklahoma

July 1997

FAS87 - PENSION FUNDING

Q. What does AG Adjustment B-3-4 represent?

A. AG Adjustment B-3-4 represents the reversal of the Company's proposal to include a pension asset in rate base, as reflected on PSO Schedule B-3, Revised 1/10/97, and W/P B-3-9. Referring to PSO Schedule B-3, the Total Company pension asset amount included in rate base is $16,797,808.

Q. If the Total Company pension asset is $16,797,808, why does AG Adjustment B-3-4 remove only $10,412,842 from rate base?

A. The amount shown on PSO Schedule B-3 as the Company rate base allowance does not recognize, or is shown gross of, the related deferred income tax reserves. While these deferred income tax reserves are not included within, or netted against, the Company's specific pension asset rate base adjustment, these amounts were nevertheless reflected in rate base through the deferred income tax reserves employed as a reduction to rate base on PSO Schedule B-3. If the Company's proforma pension asset adjustment is excluded from rate base, then the companion deferred income tax reserves should be similarly reversed.

Q. What is the basis for the Company's claim that the pension asset should be included in rate base?

A. AG Data Request No. 1-19 sought copies of all prior OCC orders and other documents relied upon by PSO as authority for the inclusion of the pension asset in rate base. In response, the Company stated:

> While there is no prior OCC order, the Company has included the Pension Funding asset as an addition to rate base.
>
> For a complete discussion of the Company's rationale, please see the prefiled testimony of Mr. John A. Jeter in this Cause.
> [AG Data Request No. 1-19]

Company witness Jeter does discuss the rationale supporting the Company's request for rate base inclusion of the pension asset. The following excerpt from pages 9 and 10 of Mr. Jeter's direct testimony summarizes the Company's basis for seeking rate base inclusion:

> From January 1, 1987 to June 30, 1996, the amount of pension costs determined in accordance with SFAS No. 87 has been $16.8 million less than the amount PSO has funded. In accordance with SFAS No. 87, PSO has recorded the difference as a prepaid pension asset (classified as deferred charges and other assets in the Company's balance sheet). The customer will receive all of the benefit of the amount funded in excess of SFAS No. 87 cost levels because the additional amounts invested in the pension fund increase the investment earnings; those earnings, which are tax free, are used to reduce, dollar for dollar, the pension cost computed in accordance with SFAS No. 87 on which PSO proposes to base its rates. Accordingly, PSO should be permitted to earn a return on its prepaid pension asset.
> [Jeter Direct Testimony, pages 9-10]

In order to support rate base inclusion of the pension asset on the basis that "[t]he customer will receive all of the benefit of the amount funded in excess of SFAS No. 87 cost levels", PSO must support a position that the pension asset amounts actually represent investor, not ratepayer, supplied funds. Logically, it would then follow that the Company's proposed rate base treatment of the pension asset is based on the presumption that, since the adoption of Statement of Financial Accounting Standard No. 87 ("FAS87") in 1987, ratepayers have benefited through a lower cost of service than would have otherwise existed. Apparently, the Company believes that the pension asset should be included in rate base as ratepayer compensation for the use of investor funds, since all earnings on those fund contributions will be used to decrease future FAS87 pension costs.

Q. Have you proposed any adjustments to the amount of pension expense included in the test year?

A. No. I have not proposed any adjustment to the amount of test year pension expense included in the Company's filed revenue requirement calculations. Since I do not believe that ratepayers have yet received the reduced pension benefits alleged by the Company, the rate base allowance proposed by the Company is inappropriate.

1 Q. Could you please describe the events or circumstances which gave rise to the recording of
a pension asset?
3 A. Yes. In December 1985, the Financial Accounting Standards Board (FASB) issued
4 Statement of Financial Accounting Standard No. 87 ("FAS87") concerning employer's
5 accounting for pension costs. Although issued in 1985, FAS87 was first effective for fiscal
6 years beginning after December 15, 1986, which PSO adopted for financial accounting
7 purposes subsequent to the review of the Company's rates in Cause No. PUD 000260.

8 Prior to FAS87, the amount of pension costs distributed to expense and capital accounts was
9 equal to the level of contributions actually made to the pension fund. It is only after the
10 adoption of FAS87 that pension costs expensed/capitalized and pension contributions began
11 to diverge. According to information supplied by the Company in response to OCC Staff
12 Data Request No. AFA-37, PSO's actual pension funding has totaled $58.3 million during
13 the period 1987 through June 30, 1996. During this same time frame, the Company recorded
14 FAS87 pension costs of $41.5 million and recorded a pension asset of $16.8 million (on a
Total Company basis) in compliance with FAS87.

16 According to the Company's description of this proposed rate base adjustment, as contained
17 in the direct testimony of Company witness Jeter, PSO is seeking to include in rate base the
18 cumulative amount by which the Company's actual pension funding has exceeded the level
19 of FAS87 pension cost during the period 1987 through test year-end.

20 Q. Since the adoption of FAS87, has the Company continued to record positive pension costs
21 in its accounting records?
22 A. Yes. Beginning with the adoption of FAS87 in 1987, the Company has continuously
23 recorded positive pension expense through the June 1996 test year. However, according to
24 PSO's responses to Transok Data Request Nos. 2-9 and 4-5, the Company will record a
25 pension credit (instead of positive pension costs) in 1997 due to adopted pension plan
26 amendments effective July 1, 1997. As illustrated by the following table, the pension asset
27 PSO has proposed to include in rate base is based on the accumulation of the difference

between the amount of funds actually contributed to the pension fund and the positive pension costs recorded by the Company in conformance with FAS87:

Year	Actual Contribution	FAS87 Pension Cost	Pension Asset
1987	$7,217,575	$7,217,575	$0
1988	6,838,724	5,546,371	1,292,353
1989	6,641,132	5,031,000	1,610,132
1990	6,638,954	3,866,000	2,772,954
1991	4,171,607	1,565,333	2,606,274
1992	5,856,000	1,283,000	4,573,000
1993	6,693,756	1,860,000	4,833,756
1994	6,345,201	12,214,000	(5,868,799)
1995	5,194,638	1,968,000	3,226,638
6/30/96	2,660,500	909,000	1,751,500
Total	$58,258,087	$41,460,279	$16,797,808

[OCC Staff Data Request No. AFA-37]

Q. Could you briefly outline the rate base concept?

A. Yes. Rate base is commonly viewed as being comprised of net utility asset investments used to provide service to ratepayers, which have not yet been recovered from ratepayers. When utility investors provide the necessary funds to support these company investments, those amounts are generally included in rate base to allow the investors a return to which they are entitled. Similarly, funds advanced, reimbursed, or otherwise paid for by ratepayers are properly excludable from rate base. With respect to the pension asset, the Company appears to have taken the position that its investors have effectively "invested" or provided the cumulative amount by which pension funding has historically exceeded the recorded pension costs, thereby justifying a current return on such amounts through rate base inclusion.

Q. Has the Company provided any further indication that the excess pension funding has been provided by its investors?

A. Yes. Referring to Appendix SCC-6, the following excerpt from PSO's response to Staff Data Request No. 292 in Cause No. PUD 1342 clearly sets forth the position that investors have funded the excess pension contribution:

> When rates are set based on inclusion of SFAS 87 expense in cost of service, rate base treatment for the excess of pension funding over SFAS 87 expense is appropriate because: (1) the customers have not funded the prepayment, the investors have; and (2) the earnings on the amounts funded in excess of SFAS 87 expense reduce future SFAS 87 expense, the customer receives those benefits.
> [Staff Data Request No. 292; Cause No. PUD 1342]

Company witness Jeter's direct testimony in Cause No. PUD 1342 also presented a similar argument for including these funds in rate base as follows:

> Since there have been no proceedings to review the rates of PSO since the 1986 test year, PSO has clearly been appropriately recording pension costs on its books in accordance with SFAS 87. The amount PSO has funded in excess of SFAS 87 costs results in additional assets in the pension fund. The investors have funded those additional amounts.
> [Jeter Direct, p. 7; Cause No. PUD 1342]

Q. Do you agree with the Company that its investors have contributed the excess pension funds?

A. No. The Company seeks to improperly combine the ratemaking treatment of pension costs with its historical accounting for this item as evidence that ratepayers have benefited to the detriment of its shareholders, alleging that investors (not ratepayers) have advanced the "excess" funds. It is true that when contributions to the pension fund exceed recorded pension costs, the difference is typically recorded as a "prepayment". The assumption relied upon by the Company is that any prepayment must have been funded by its investors, since the "excess" amount funded was not charged to expense, while investors were unable to withdraw comparable amounts from the pension fund. In order to further support its position, the Company has rationalized that, since pension expense in Cause No. PUD 260 was based on GAAP and the amount of pension costs included in PSO's last rate case (Cause PUD 1342) is not determinable because of the settlement in that proceeding, investors must be "out-of-pocket" and rate base inclusion is appropriate. [OCC Staff Data Request No. AFA-37]

In many circumstances, it may be possible to clearly point to an occurrence or event and establish who paid for what costs. Through the utilization of lead/lag studies, it is also possible to measure whether certain transactions are effectively paid with investor or ratepayer supplied funds. However, in this case, the Company has not presented any evidence that investors have actually advanced the excess pension funds other than to cite to the continuation of accrual accounting from PUD 260.

Q. Do you believe that ratepayers have received the benefit of the excess pension funding merely as a result of the Company recording lower pension costs?

A. No. I disagree with that premise for several reasons. First, I do not believe that it is possible to accurately quantify the accumulated net pension recoveries from or benefits provided to ratepayers. In order to prepare such a calculation, I believe that it would be necessary to reconcile the amount of actual pension costs recovered from ratepayers with the amounts actually contributed to the pension fund since the establishment of the pension plan. Such a quantification would be significantly complicated by the fact that the level of pension costs charged to expense over the years does not necessarily equate to the amount of pension costs recovered from ratepayers (i.e., included in cost of service) or contributed to the pension plan.

Second, the Company's pension plan and pension accounting have existed for decades. By focusing solely on the accounting entries underlying the pension asset balance recorded since 1987, the Company has excluded from consideration a substantial portion of the history which underlies the pension fund, pension accounting and cost of service. Assuming that net recoveries from ratepayers can be accurately quantified, the Company inappropriately relied solely on its accounting records for purposes of determining the amount includable in rate base. From a cost of service perspective, the use of data beginning in 1987 would indicate that ratepayers have provided more pension costs through rates than have been contributed to the pension plan. Such a calculation leads to further questions as to whether rate base should be reduced, rather than increased as proposed by the Company.

1 Third, PSO has sought to include the entire pension asset balance in rate base even though
the Company has not demonstrated that 100% of these "excess" benefits have been actually
3 flowed through to its ratepayers. Unless the Company can somehow demonstrate that the
4 negative pension costs have been flowed through to its customers, PSO's rate base proposal
5 will charge ratepayers with a return on funds they never received -- thereby, unnecessarily
6 benefitting Company investors.

7 Q. Was the level of pension cost included in the PUD 260 and the PUD 1342 cost of service
8 based on accrual accounting?
9 A. Not necessarily. According to the response to Staff Data Request No. 499 [PUD 1342]
10 which is attached as Appendix SCC-7, the amount of pensions funded and charged to
11 expense, pursuant to APB8, were the same in 1985 and 1986. The PUD 260 proceeding was
12 based on a 1986 historical test year adjusted for the funding of an early retirement window.
13 Consequently, an argument could be made that the PUD 260 pension expense was based on
14 an actual funding method, since the amount funded and expensed was the same. Under that
scenario, the Company would have historically been collecting the amount "funded" through
16 utility rates; therefore, the excess of pension contributions over pension expense would have
17 been supplied by ratepayers, not investors.

18 Further, PUD 1342 was resolved through a negotiated settlement. As indicated in the
19 response to OCC Staff Data Request No. 37 in the current proceeding, the amount of pension
20 cost included in cost of service in PUD 1342 is not determinable because of that settlement.
21 Similarly, an argument can be made that the existing rates are based on "funded" pension
22 costs.

23 Q. It would seem that the Company is basically representing that cost of service has been based
24 on the lower FAS87 pension costs which justifies including the pension asset in rate base.
25 It is your representation that the lower FAS87 accruals have not been reflected in cost of
26 service and flowed through to the benefit of ratepayers. How can the Commission reconcile
27 these positions?

A. In order to clarify the Company's position on this issue, Staff Data Request No. 430 was submitted in PUD 1342 (attached as Appendix SCC-8) to assess whether PSO's rate base inclusion was then dependent on a comparison of actual pension costs provided by ratepayers (i.e., included in the PUD 260 cost of service) with actual pension funding during the 1987-1992 period. The Company responded as follows:

> No. The level of pension costs included in test year cost of service in our last case [PUD 260] is not relevant to our proposed inclusion of the pension funding adjustment in rate base.
>
> In Cause No. PUD 000260, pension costs were included in cost of service based on APB 8 which was GAAP at the time. In 1987, SFAS 87 became effective. Absent a specific directive or order, PSO is required to follow GAAP, as are all regulated entities. The $12.9 million [pension asset] represents the cumulative amount of pension funding that has been in excess of pension costs calculated in accordance with GAAP.
>
> Prices are set on a test year basis. Therefore, a utility does not track individual levels of expenditures incurred against amounts included in prices unless directed by and/or discussed with regulators. Pension cost is one example of an item included in test year cost of service that has decreased since 1986. However, there are several costs included in test year cost of service that have increased such as depreciation (based on existing depreciation rates) and ad valorem taxes.
> [Staff Data Request No. 430; PUD 1342]

In the pending proceeding, the Company has included positive pension costs in the quantification of revenue requirement and has projected that 1997 pension costs will be negative under FAS87 in 1997. Since negative pension costs will also cause the pension asset to increase over time, Attorney General Data Request No. 7-15 was submitted to determine how the Company plans to account for the difference between the level of positive pension costs included in rates and the negative costs expected to be recorded in 1997. The Company responded as follows:

> For accounting purposes, the Company will follow GAAP and record pension expense in accordance with SFAS 87. For regulatory purposes, test period expenses should be used in determining rates. The Company will not compare future SFAS 87 pension book expenses with test period expenses to record a regulatory asset for under-recovery of expense and the Company will not record a regulatory liability for over-recovery of pension expenses. Nor will the Company compare other

> components of cost of service expenses such as office supplies, production maintenance, tree-trimming expenses, sub-station operations, etc., to see if actual costs are greater than those used in the test period to set rates. In determining rates, it is proper to use a test period approach in determining the expense level to be used in determining the Company's revenue requirements.
> [Attorney General Data Request No. 7-15]

Generally, I agree with the Company that it is not appropriate to reconcile specific components of cost included in past rate orders with subsequent costs incurred. In fact, I address this matter in another testimony section concerning PSO's requested storm damage allowance, arguing that it is improper to allow utilities to engage in retroactive or piecemeal ratemaking, simply because expenses were incurred which had not been specifically considered in determining existing rate levels.

In my opinion, this same theory applies to this "excess" pension funding issue. While the Company has not attempted to specifically identify dollars included in prior causes, it has attempted to construct a theory predicated on its view of the accounting framework underlying the prior rate proceedings to support its rate base position in this case. Nevertheless, the Company has not presented any evidence clearly demonstrating that investors, not ratepayers, have advanced the "excess" pension amounts.

Q. Since the adoption of FAS87, how do the levels of pension costs considered in prior rate proceedings compare to actual pension fund contributions?

A. While the Company seems to argue that costs or benefits are recovered from or provided to ratepayers when the expense is booked in order to support including the pension asset in rate base, the amount of pension costs actually recorded by the Company varies significantly from both the actual amount of pension contributions and the level of pension costs included in cost of service. The following estimated comparison, which starts in 1987 with the adoption of FAS87, illustrates the potentially extreme differences between pension funding, FAS87 pension costs and pension costs included in rates. [Note: The following results are comparable to the earlier table which computed the pension asset. Further, the cost of service amounts do not recognize the effect of revenue growth on customer collections.] Because the PUD 1342 pension cost amount is not determinable due to the compromise

resolution of the revenue requirement issues in that proceeding, this table compares funding levels with FAS87 pension costs and pension costs included in PUD 260 cost of service in order to illustrate the problem raised by PSO's position on the pension asset issue:

Year	Actual Funding	FAS87 Pension Cost	PUD 260 Cost
1987	$7,217,575	$7,217,575	$6,606,164
1988	6,838,724	5,546,371	6,606,164
1989	6,641,132	5,031,000	6,606,164
1990	6,638,954	3,866,000	6,606,164
1991	4,171,607	1,565,333	6,606,164
1992	5,856,000	1,283,000	6,606,164
1993	6,693,756	1,860,000	6,606,164
1994	6,345,201	12,214,000	6,606,164
1995	5,194,638	1,968,000	6,606,164
6/30/96	2,660,500	909,000	3,303,082
Total	$58,258,087	$41,460,279	$62,758,558

[OCC Staff DR AFA-37; OCC Staff DR 23, 291 and 499, PUD 1342]

Although the PUD260 rate order was not effective until late September, 1987, this comparison would appear to indicate that ratepayers may have provided more than the amount PSO has contributed to the pension fund during this period of time. Unless the Company can somehow demonstrate that the lower FAS87 pension costs arising between rate proceedings were somehow flowed through to the benefit of ratepayers, it is my opinion that the above comparison is relevant in further demonstrating PSO's failure to meet its burden of proof to establish that shareholders, not ratepayers, have effectively contributed the excess pension funding. If the ratepayer is the source of the funds, then the inclusion of the Company's "pension asset" in rate base will improperly charge ratepayers a return on the very funds they have already provided and will result in a windfall to PSO's investors.

Q. Do you have any final comments concerning this issue?

A. Yes. In the discussion of the storm cost issue addressed in an earlier testimony section, I referenced the Company's achieved returns on equity during calendar years 1987 through 1996. Appendix SCC-2 supported the quantification of an Adjusted ROE earned by PSO during this time frame after the write-off of the 1987 Ice Storm costs. Further, Appendix SCC-2 also provides a year-by-year quantification of the estimated earnings excess/ deficiency achieved by PSO that is implied by the Adjusted ROE in comparison to an ROE of 13.5% authorized by the Commission in PUD 260.

Conservatively using the 13.5% ROE as the target return throughout this entire ten year period, it would appear that PSO may have achieved cumulative excess earnings of approximately $16.6 million. Interestingly, this $16.6 million <u>after tax</u> cumulative excess is approximately equal to the $16.8 million pension asset (gross of deferred income tax reserves) and exceeds the $10.4 million net pension asset amount that PSO has proposed to include in rate base. In addition to the reasons stated earlier for excluding the pension asset from rate base, I believe that the adoption of the Company's proposal will result in an avoidable and unnecessary earnings windfall to PSO's investors.

BEFORE THE OKLAHOMA CORPORATION COMMISSION

OKLAHOMA GAS AND ELECTRIC COMPANY

CAUSE NO. PUD 960000116

DIRECT TESTIMONY OF

STEVEN C. CARVER

On Behalf of the

Attorney General - State of Oklahoma

October 1996

DEFERRED INCOME TAX RESERVES - PENSION LIABILITY

Q. Why is AG Adjustment B-3-6 necessary?

A. AG Adjustment B-3-6 adjusts OG&E's rate base to reflect the elimination of the debit deferred income tax reserves associated with the pension liability recorded by the Company.

Q. Has the pension liability been included as a reduction to rate base?

A. No. In response to Data Request No. AG2-68, the Company provided the following rationale for not using the pension liability as an offset to rate base:

> Rate base has not been reduced for the accrued OPEB and pension liabilities as the expenses recorded in past periods have not been collected in rates as specifically disallowed in PUD 1055 and PUD 259. Beginning in 1994, the Company's goal is to fund OPEB and pension liability to the extent they have been recovered through rates.
> [Data Request No. AG2-68]

Q. Could you briefly outline the rate base concept?

A. Yes. Rate base is commonly viewed as being comprised of net utility asset investments used to provide service to ratepayers, and which have not yet been recovered from ratepayers. When utility investors provide the necessary funds to support these company investments, those amounts are generally included in rate base to allow the investors an opportunity to earn a return to which they are entitled. Similarly, funds advanced, reimbursed, or otherwise paid for by ratepayers are properly excludable from rate base.

With respect to the pension liability, the Company's accounting for this item also gave rise to a companion debit deferred income tax reserve, which has been used to increase OG&E's proposed rate base. Because the Commission has historically set rates to include pension costs on a funded basis only, it is my recommendation that the pension liability not be used as a rate base offset and that the related deferred income tax reserves also be similarly and consistently excluded.

Q. Could you please briefly describe the events or circumstances which gave rise to the recording of a pension liability?

A. Yes. In December 1985, the Financial Accounting Standards Board (FASB) issued FAS87 concerning employers' accounting for pension costs. Although issued in 1985, FAS87 was first effective for fiscal years beginning after December 15, 1986. Prior to FAS87, most companies recorded an amount for pension costs in their expense and capital accounts equal to the level of contributions actually made to the pension fund. It is only after the adoption of FAS87 that pension costs expensed/capitalized and pension contributions began to diverge.

In order to implement FAS87 accounting, utilities have typically record either a pension asset (if the FAS87 determined pension costs are less than the amount of pension costs actually funded) or a pension liability (if FAS87 costs exceed the funded amount). Since OG&E falls into the latter situation, a pension liability has been recorded by the Company.

1 Q. Why do you believe that this adjustment is necessary?

2 A. Over the past several years, I have been involved in a number of rate proceedings in which
3 the utility has sought to include a recorded pension asset in rate base, alleging that such asset
4 represents investor supplied funds. In my opinion, this argument has been made despite the
5 fact the utility has been unable to demonstrate that ratepayers have actually benefited from
6 the lower pension costs booked in accordance with FAS87.

7

8 In the current proceeding, the Company has stated that ratepayers have not paid the higher
9 FAS87 based pension costs, so rate base should not be reduced by the pension liability
10 account. I agree. Unless ratepayers have fully participated in the cost levels which gave rise
11 to either the pension asset or pension liability balances, those amounts do not belong in rate
12 base.

13

14 Because provisions of the Internal Revenue Code only allow a deduction for pension costs
15 actually funded (after considering other funding limitations), the recording of either a
16 pension asset or a pension liability also results in the recording of certain entries to deferred
17 income tax expense and deferred income tax reserve accounts. I strongly believe that if the
18 facts and circumstance surrounding the pension liability do not support a rate base reduction,
19 then it would be improper to increase rate base by the debit deferred income tax reserves
20 related to that liability.

Exh 57

BEFORE THE OKLAHOMA CORPORATION COMMISION

OKLAHOMA NATURAL GAS COMPANY

CAUSE NOS. PUD 001151, 001144 & 001190

DIRECT TESTIMONY OF

STEVEN C. CARVER

On Behalf of the

Attorney General of the State of Oklahoma (AG)

August 1993

PENSION ASSET

Q. Please identify AG Adjustments/Schedules B-4 and C-18.

A. AG Adjustments/Schedules B-4 and C-18 represent the elimination of a portion of ONG's Pro Forma Adjustment No. E-1 from the cost of service. According to the Company's description of this adjustment, ONG is seeking to include in rate base the amount of deferred pension costs existing as of test year-end. In addition, the Company has proposed to include a cost of service allowance for pension expense equal to the sum of a five-year amortization of the deferred balance and its 1992 pension fund contribution. These Attorney General adjustments eliminate the pension asset net of the related deferred income tax reserves from rate base and remove the five-year amortization from the cost of service.

Q. Could you please describe the events or circumstances which gave rise to the deferral of pension costs?

A. Yes. In December 1985, the Financial Accounting Standards Board (FASB) issued Statement of Financial Accounting Standard No. 87 (FAS87) concerning employer's accounting for pension costs. Although issued in 1985, FAS87 was first effective for fiscal years beginning after December 15, 1986, which ONG adopted for financial accounting purposes

during its 1987 fiscal year. However, the test year in Cause No. PUD 000260 (i.e., the Company's last rate review) was based on the twelve month period ended December 1986 and included "zero" pension expense in cost of service.

Q. If the test year in PUD 000260 included "zero" pension expense in cost of service, could you explain the factors which contributed to the creation of the deferred pension costs which ONG has proposed to include in the determination of revenue requirement?

A. In response to a request by ONG, the OCC Staff issued a letter dated September 11, 1989, from Mr. Howard W. Motley (then Director of the Public Utility Division) to Mr. J. A. Metcalf of ONG recognizing that the PUD 000260 case did not include any pension expense and suggesting the form of rate treatment the Staff would propose for this item in ONG's next rate case. Generally, the Staff was supportive of a proposal in which actual cash funding amounts would be compared with the level of pension expense included in the Company's most recent cost of service determination with any resulting difference deferred for recovery, or refund, in the next rate proceeding, over an unspecified period of time.

The closing paragraph of this letter contained the following Staff recommendation:

> Accordingly, we recommend that ONG defer the difference between actual cash funding requirements for pensions and the amount allowed in the most recent rate determination. The accumulation of these unrecovered pension funding payments will be carried on the books at cost and will not accrue any carrying charges; however, Staff will further evaluate these amounts during its rate case audit for rate base consideration.
> [Staff Data Request No. 132]

On a cumulative basis, the Company has deferred approximately $18.4 million as of test year-end representing the excess of pension fund contributions over the "zero" allowance included in PUD 000260. A copy of Mr. Motley's letter, provided in response to OCC Staff Data Request No. 132, has been attached as Appendix SCC-3.

Q. Do you have a breakdown of the $18.4 million by year?

A. Yes. As provided in response to OCC Staff Data Request Nos. 102 and 250, the $18.4 million is comprised of annual deferrals of pension contributions and administrative costs recorded in the following amounts:

Fiscal Year	Pension Cost Deferral
1987	$ 0
1988	0
1989	1,276,102
1990	2,249,131
1991	8,876,275
1992 *	5,984,903
Total	$18,386,411

* Through February 1992.

PER AG 24-24 ONG
ERISA Min for YE 12/31:
1986 ~~0~~
1987 ~~0~~
1988 533.67

Q. Does this breakdown of the deferral balance mean that ONG did not experience any pension expense in 1987 or 1988?

A. No. According to the response to OCC Staff Data Request No. 102, the Company did recognize pension expense which was not deferred in 1987 and 1988 of $40,788 and $706,289, respectively. However, in the 1990 fiscal year, ONG recorded a "true-up" deferral accounting entry which had the effect of deferring the 1987 and 1988 amounts. While the timing of the deferral was delayed in relation to the year of the initial expense recognition, the Company did ultimately defer all pension expense during this time period.

Q. You previously referenced a 1989 letter from the Staff to ONG recommending that the Company record the deferral of the difference between actual cash funding and the amount of pension costs included in the preceding rate review. Do you agree with the Staff's recommendation?

A. No. I disagree with the Staff's recommendation for several reasons. First, it is interesting to note that this letter was quick to point out that the OCC Staff had not performed a thorough study in determining the pension expense level in PUD 000260 as set forth in the following excerpt from said letter:

> Historically, the Commission has followed a "pay-as-you-go" approach, which compensated the utilities for pension expense as it was incurred and paid to the trustee during the test year for which rates were determined. However, the Commission Staff has also recognized unusual circumstances or incurrence of extraordinary expenses on a pro forma, normalized basis. The fact that there was zero pension cost recognized for ratemaking purposes for ONG in Cause No. 000260 was an extraordinary circumstance. Staff's desire to move quickly to establish reduced rates did not permit performance of a thorough study to determine a normalized level of pension cost. Therefore, it was determined to include a zero cost for pensions and to address the issue in a generic hearing, or at such time as specific funding requirements became a reality.
> [OCC Data Request No. 132]

While the Staff letter dated September 11, 1989, followed the Company's August 1989 verbal request for accounting guidance for ONG's outside auditors (see response to AG Data Request No. 24-23), the letter also indicates that the small amount of pension expense recorded during the test year was eliminated because "...ONG's funding requirements for the prospective year were zero, and Staff had plans to conduct generic hearings to consider the pension cost issue." Even though the Staff's review may not have been as thorough as would have been preferred, the Staff did support the pension cost elimination by determining that the prospective year funding was expected to be "zero".

The second reason I disagree with the Staff's letter recommendation concerns the violation of basic ratemaking

1 tenets. It is widely accepted that cost based utility
2 rates, once established by a ratemaking body, are deemed to
3 be just and reasonable until such time as a moving party
4 carries its burden of proof to establish that said rates are
5 no longer just and reasonable.
6
7 Whenever a rate case is filed by a utility, it assumes a
8 risk that the rates filed and ultimately approved will
9 either be inadequate or excessive, no matter what test year
10 approach or series of adjustments are proposed by the
11 parties. Generally, utility rates are authorized based on a
12 known and measurable test year cost of service regardless of
13 the actual level of costs which might be incurred during the
14 rate-effective period. If utility rates are inadequate,
15 then the remedy available to the Company is to timely file
16 for a rate increase. Conversely, excessive utility rates
17 normally require the filing of a complaint-style
18 investigation by the commission staff or consumer group, as
19 utilities are rarely willing to voluntarily initiate base
20 rate reductions.
21
22 It is also generally recognized that to allow utilities to
23 collect additional funds from ratepayers simply because
24 expenses were incurred which had not been specifically
25 provided for in the determination of the existing base rates
26 is considered retroactive ratemaking. While past expenses

are frequently employed in quantifying or developing the prospective cost of service on which overall rates are based, it is improper to establish future rates at levels intentionally designed to recover past losses or under-recoveries due to a historical imbalance in the matching of rates and actual expenses.

Q. Do you have anything further to add on this point?

A. Yes. Another problem with the approach outlined in the Staff's letter and proposed by the Company concerns the concept of piecemeal ratemaking. "Piecemeal ratemaking" generally relates to situations in which utility rates are sought to be increased or decreased through incremental changes without any showing that the proposed changes have not been offset by yet other changes in the components of the revenue requirement formula. With respect to the pension asset, ONG has failed to demonstrate that other factors have not occurred since the implementation of the PUD 000260 rates which offset the deferred pension amount. In my opinion, the Company's proposal represents a piecemeal attempt to set prospective rates on isolated past costs.

Q. Could you give some examples of items which may offset the pension asset recorded by ONG, but the Company has not similarly quantified as an offset to the pension asset?

A. Yes. Since the PUD 000260 proceeding, the Company has experienced additional growth in customer levels which have provided additional margins to the benefit of ONG. (1) The PUD 000260 rate base contained allowances for prepaid gas, primarily comprised of prepaid gas purchase deficiencies, and the Edmond Storage Loss which have continued to decline subsequent to the Commission's order. However, none of these rate base decrements were similarly deferred or captured by ONG for offset against the pension deferrals.

Q. How significantly have these items changed since PUD 000260?

A. The rate base in a typical rate proceeding is often quantified using several different valuation methodologies, including test year-end or thirteen month averages. PUD 000260 was no exception. The following comparison sets forth the amount of these items at different valuation dates so as to illustrate the magnitude of their related rate base decline since the last rate review:

	12/31/86 BALANCE	PUD 260 ORDER	PUD 1190 ONG FILING	2/28/92 BALANCE	Decrease Since PUD 260
Gas Deficiency Payments	$ 24,911,229 #	$ 24,911,229 #	$ 14,743,768 @	$ 14,103,076 @	10,808,153
Edmond Storage Loss	21,820,626 *	20,672,172 *	9,953,268 @	9,953,268 @	10,718,904
					21,527,057

AG Data Request No. 11-6 [PUD 260; Staff Exhibit ONG-9; Sec.E, Sch.1].
* OCC Data Request 122A [PUD 260; Staff Exhibit ONG-9; Sec.E, Sch.4].
@ ONG 2/92 Filing PUD 1190 [Sec.E, Sch.1 and 2].

1 Q. Have the balances for the Gas Deficiency Payments and Edmond
2 Storage Loss continued to decline subsequent to February
3 1992?
4 A. Yes.
5
6 Q. What is the accounting disposition of the amounts by which
7 the Gas Deficiency Payments have declined during this time
8 period?
9 A. According to the response to OCC Staff Data Request No. 34A,
10 ONG makes gas deficiency payments to producers for gas it is
11 contractually required to take, but is unable to sell or
12 even take possession of due to market conditions. However,
13 ONG retains a right to either take such gas in the future or
14 receive repayment, subject to certain contract limitations,
15 thereby making these deficiency payments recoupable by ONG.
16
17 If ONG does ultimately take gas previously paid for, the
18 balance of the gas deficiency account is reduced accordingly
19 and the cost of the gas received is recovered through the
20 Company's purchase gas adjustment clause. However, since a
21 rate base allowance was provided in PUD 000260 for these gas
22 deficiency payments, the Company has continued to recover a
23 return on the full rate base allowance through its tariffs
24 even though the amounts have been subsequently recovered
25 from ratepayers. This process results in ratepayers
26

1 continuing to provide a return on funds for which ONG is no
2 longer out-of-pocket.
3
4 On the other hand, the cost associated with any gas that ONG
5 is ultimately unable to take is transferred from the gas
6 deficiency account to the take-or-pay account. Even though
7 an allowance was included in the PUD 000260 rate base for
8 gas deficiency payments, any amounts transferred to the
9 take-or-pay account are immediately eligible for carrying
10 costs without any offset for the return on said funds
11 already included in the determination of the revenue
12 requirement in the last rate review. Consequently, the
13 Company effectively recovers a return on the same funds
14 twice until the next following rate review is concluded.
5
16 AG Data Request No. 27-22 was issued to follow-up on this
17 matter. As of the writing of this testimony, the discovery
18 request remained outstanding.
19
20 Q. Can you briefly describe the Edmond Storage Loss including
21 any subsequent declines in the deferred debit account
22 balance since PUD 000260?
23 A. Yes. In 1985 and 1986, ONG commissioned studies which
24 determined that sub-surface leaks in the Edmond Storage
25 facility had resulted in a substantial quantity of lost gas.
26 Pursuant to OCC Staff concurrence and rate treatment in PUD

000260, the Company transferred approximately $23 million attributed to the loss from gas storage inventory to a deferred debit account to be ratably amortized to purchased gas expense over a ten year period. The Company has proposed in the instant proceeding to continue the recovery of the Edmond Storage Loss amortization through base rates. [OCC Staff Data Request Nos. 122 and 122A; AG Data Request No. 7-28; ONG Section H, Schedule 3(G-6)]

As ONG continues to amortize and recover this loss through ratable amortization, the accounting entry to record the amortization would continue the charge to purchased gas expense and decrease the balance in the deferred debit account. The deferred debit account balance will continue to decline until the balance reachs "zero" upon completion of the amortization in 1996.

Q. Based on the declines in these cost of service elements, is it your testimony that the Company's overall revenue requirement has declined since PUD 000260?

A. No. On a pro forma basis, the Attorney General has recommended a rate increase for ONG in this proceeding. Although utilities do experience declines in overall revenue requirement from time to time, it is not my testimony that such a situation presently applies to ONG.

1 Q. Could you then explain the purpose behind your discussion of
2 changes in these cost of service components since PUD
3 000260?
4 A. Yes. ONG has intentionally selected one isolated element of
5 a past revenue requirement determination (i.e., pension
6 costs) to defer for possible prospective rate recovery on
7 the basis that a "zero" allowance for such costs was
8 included in PUD 000260. However, ONG has failed to account
9 for the fact that the revenue requirement in the last case
10 ultimately provided the Company an opportunity to
11 over-recover certain other elements.
12
13 Q. Is it your recommendation that a reasonable alternative to
14 the Company's proposal would be to implement a mechanism to
15 track various changes in the components of revenue
16 requirement over time?
17 A. No. The creation of mechanisms which are designed to track
18 changes in specific revenue requirement elements, as ONG has
19 proposed for pension costs, represents a movement toward
20 formula-based rate regulation. It is my opinion that a
21 formula-based approach to ratemaking severely handicaps or
22 undermines the basic goal of utility regulation: by serving
23 as a surrogate to full and complete competition, regulation
24 should attempt to ensure that utilities provide safe and
25 adequate service at reasonable cost with the opportunity for
26 the utility to earn a fair return on its investment.

1 Depending on the breadth of the cost tracking mechanisms,
2 such an approach to regulation erodes the element of risk
3 and uncertainty from a utility's financial picture. As risk
4 diminishes and certainty increases, the utility should
5 expect a lower equity return as compensation for the lower
6 risk. Additionally, the evolution of such mechanisms
7 provide the utility with a diminishing incentive to improve
8 its overall efficiencies. Although regulatory lag is often
9 cited as a negative feature of utility regulation, utility
10 companies can also benefit by or receive incentives from
11 such a lag by having the opportunity to solely retain all
12 operational efficiencies and savings achieved between rate
13 case proceedings.
14
15 The downside to regulatory lag, often the ire of utility
16 companies, is that cost increases between rate cases are
17 also retained by the utility until a new rate case is filed
18 by the company. However, a utility might be able to achieve
19 the best of both worlds if it could convince the regulator
20 to implement a cost tracking mechanism to protect earnings
21 from increasing (or fluctuating) cost of service elements
22 while ignoring offsetting efficiencies, revenue requirement
23 declines or equity return impacts. Under such an
24 arrangement, the utility would ensure recovery of certain
25 costs from ratepayers while other efficiencies achieved
26 during the same period would not be shared with ratepayers.

Rather than engage in piecemeal, retroactive ratemaking, it is my belief that regulators should adopt the view that approved utility rates are established prospectively on the best information available, until modified by subsequent commission order. Absent symmetrical procedures for under-earning and over-earning situations, any costs incurred by the utility should be presumed to be covered by existing rates, regardless whether the cost of service study underlying said rates included a specific allowance for that unique cost. Otherwise, the result could entail a endless reconciliation process comparing each element of actual costs during the rate-effective period with the cost of service details underlying the preceding rate case order.

For the above reasons, I believe that the pension asset and related amortization should be eliminated from ONG's revenue requirement. In addition, I recommend that the Commission deny ONG's request for a pension tracking mechanism as I generally do not believe that such mechanisms are appropriate for utility ratemaking purposes.

Q. Does the Company agree that piecemeal, retroactive ratemaking should not be considered in the ratemaking process?

A. Based solely on its pension asset proposal in this case, I would have assumed that the Company does not agree.

However, after reviewing ONG's responses to several data requests, it does not appear that the Company and I have significant differences with the concept of piecemeal, retroactive ratemaking. Instead, the immediate issue may concern more the interpretation and application of that concept to the pension asset issue.

Q. Please address the Company data request responses which address ONG's views on retroactive ratemaking.

A. ONG has responded to three separate OCC Staff data requests in a manner setting forth the Company's view on piecemeal, retroactive ratemaking. First, OCC Staff Data Request No. 122A sought information concerning the return ONG has collected to date as a result of including the Edmond Storage Loss in rate base. A portion of the response thereto included the following discussion in which ONG briefly addresses the concept of piecemeal ratemaking:

> Additionally to single out an individual investment item which is decreasing in magnitude is likewise <u>improper</u> without also looking at the other utility investments made by ONG, such as rebuilding pipelines, etc., that would increase the ratebase if taken into account.
> [OCC Staff Data Request No. 122A; Emphasis Added]

Second, OCC Staff Data Request No. 301 required the Company to prepare a recalculation of the take-or-pay (TOP) amortization by quantifying settlement carrying costs on "a

net of deferred taxes basis." While the Company provided the information requested, ONG also supplied a brief description of the rate case history surrounding the TOP deferrals as well as the following discussion of piecemeal, retroactive ratemaking:

> From the calculation requested in Data Request No. 301, we can only assume that Staff is contemplating making an adjustment relating to deferred income taxes on the take-or-pay settlement payments. It is, and will be, ONG's position that any such adjustment for past rate calculations is totally inappropriate and would amount to <u>retroactive ratemaking</u> and/or a collateral attack on previous Commission orders. It is ONG's feeling that even though additional settlement payments have been made and approved for amortization calculations subsequent to the above-mentioned orders and there are additional deferred income taxes as a result of these payments, it would be totally inappropriate for Staff to make <u>retroactive adjustments</u> relating to these payments and deferred income taxes.
>
> To pick one item out of the whole array of items upon which return is calculated we feel is <u>unwarranted</u>. There are numerous examples of increases in rate base between rate hearings in which a utility company such as ONG does not recover appropriate returns. The increase in deferred pension cost and the net increase in utility plant are two examples of investments upon which ONG has received no return subsequent to the 1987 rate order.
> [OCC Staff Data Request No. 301; Emphasis Added]

Third, OCC Staff Data Request No. 365 referenced the response to OCC Staff Data Request No. 301 and requested another recalculation of the TOP deferral, instead using a rate of return which contained a tax gross-up on only the equity component. Without debating the propriety of

correcting errors or inaccuracies in the earlier TOP deferral calculations in this testimony, it is important to recognize that the Company did provide certain calculations, further responded by referencing the above quoted response to OCC Staff Data Request No. 301, and stated:

> It is Oklahoma Natural's position the calculations provided herewith are inappropriate and contrary to direct Commission order. Oklahoma Natural followed the order issued by the Oklahoma Corporation Commission in determining the appropriate return factor to use for the unamortized balance of the take-or-pay account. Upon notice from the Commission of a revision to the appropriate return, Oklahoma Natural reduced the rate of return it applied to the account on a prospective basis. At no time did the Commission staff suggest a prior period adjustment would be necessary as a result of utilizing the return factor provided for in the initial order. Hence, Oklahoma Natural believes it is <u>improper</u> to <u>retroactively</u> make an adjustment for correctly following prior Commission orders.
> [OCC Staff Data Request No. 365; Emphasis Added]

Although ONG only specifically referenced rate base as opposed to the overall cost of service, the Company's views on piecemeal and retroactive ratemaking do not appear to be significantly different from mine. However, as I indicated previously, the Company has a very different approach to applying this apparently common theory. It seems that ONG finds it quite acceptable to retroactively reach back in time to reflect isolated costs which increase future revenue requirements, but any corrections or circumstances that

could decrease rates prospectively are decried as improper and unwarranted. Clearly, I disagree with ONG's position in this regard.

Q. Has the Attorney General proposed any adjustments to ONG's quantification of the TOP deferral and amortization?

A. Mr. Brosch is responsible for the review of this area and will sponsor any Attorney General proposals to modify ONG's deferral and amortization of TOP settlements. Any questions concerning that issue should be addressed to Mr. Brosch.

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF QWEST CORPORATION'S FILING AMENDED RENEWED PRICE REGULATION PLAN	)))	DOCKET NO. T-01051B-03-0454
IN THE MATTER OF THE INVESTIGATION OF THE COST OF TELECOMMUNICATIONS ACCESS	))	DOCKET NO. T-00000D-00-0672

DIRECT TESTIMONY

OF

STEVEN C. CARVER

ON BEHALF OF THE STAFF OF THE ARIZONA CORPORATION COMMISSION

PUBLIC VERSION

("Highlighted" Text Denotes Confidential Material)

NOVEMBER 18, 2004

Q. Please briefly summarize the key elements underlying Staff's proposed TBO amortization.

A. As discussed previously, the adoption of accrual accounting was not disputed by Staff or RUCO in Qwest's last rate case. It is my belief that it was the regulatory intent of the parties in Qwest's last rate case to explicitly recognize the TBO amortization as an added cost of transitioning from PAYGO to accrual accounting, even though the settlement agreement in that docket was silent on the issue. In addition, Qwest has not maintained its Arizona intrastate regulatory accounting records in strict compliance with the PAYGO accounting method adopted by the Commission in Docket No. E-1051-93-183 (Decision No. 58927). Based on this information and history, Staff has recognized accrual accounting for OPEB costs in developing overall revenue requirement, including the amount of the TBO amortization requested by Qwest and not opposed by Staff in Docket No. T-1051B-99-105.

FAS87 PENSION ASSET

Q. Is Staff proposing an adjustment to the Company's proposed inclusion of the pension asset in rate base?

A. No.

Q. If Staff is not opposing the Company's proposed treatment of the pension asset, why is Staff presenting testimony on this issue?

A. Since Staff has opposed similar recommendations in prior Qwest rate proceedings, the basis for Staff's non-opposition should be clearly communicated. As discussed previously, I believe the Company has misconstrued and misinterpreted Staff's non-opposition to the regulatory recognition of accrual accounting for OPEB costs in Qwest's last rate proceeding (Docket No. T-1051B-99-105) – a problem Staff desires to avoid in future proceedings concerning either OPEB costs or the pension asset.

Q. Why is Staff not opposing inclusion of the pension asset in rate base?

A. Updated Staff analyses of pension credits presumably recognized in the ratemaking process now indicate that Qwest's Arizona intrastate customers have substantially participated in cumulative pension credits, supporting rate base inclusion .

Q. Have you addressed this issue in past rate proceedings involving Qwest?

A. Yes. The following table identifies the Qwest proceedings in various jurisdictions in which I have sponsored testimony opposing the inclusion of a pension asset in rate base:

Jurisdiction	Case / Docket	
Arizona Corporation Commission	E-1051-93-183	(a)
	T-1051B-99-105	(a)
Utah Public Service Commission	97-049-08	(a)
Washington Utilities and Transportation Commission	UT-930074	(b)

Note (a): Rate case proceedings. Note (b): AFOR – sharing proceeding.

Q. In the proceedings identified in this table, did you recommend the complete elimination of the pension asset from rate base?

A. Yes. In those proceedings, my pension asset analyses were similar to those prepared in the current proceeding and resulted in recommendations excluding the pension asset from rate base. Absent a demonstration that ratepayers had materially participated in the cumulative pension credits comprising the pension asset, my analyses fairly consistently questioned whether the alleged benefits were instead enjoyed by investors, not ratepayers.

Pension Cost Accounting

Q. Please describe the events or circumstances giving rise to the pension asset.

A. In December 1985, the Financial Accounting Standards Board ("FASB") issued Statement of Financial Accounting Standards No. 87 ("FAS87"), concerning employers' accounting for pension costs. Qwest adopted FAS87 for financial accounting purposes effective January 1, 1987. Prior to FAS87, the amount of pension costs distributed to expense and capital accounts was equal to the level of contributions actually made to the pension fund. After the adoption of FAS87, pension costs expensed/ capitalized and pension contributions began to diverge. Since the adoption of FAS87, Qwest began

recording negative pension costs (a pension credit) instead of positive pension costs. The pension asset balance represents the accumulation of those pension "credits".

Staff Approach

Q. Could you briefly outline the rate base concept?

A. Rate base is commonly viewed as being comprised of net utility asset investments used and useful in providing service to customers. When investors provide the funds necessary to support these company investments, those amounts are generally included in rate base, allowing investors an opportunity to earn a return on invested capital. Similarly, funds advanced, reimbursed, or otherwise paid for by customers are properly excluded from rate base. The direct testimony of Company witness Grate (page 116) discusses various reasons supporting rate base recognition of the pension asset, including:

- The pension asset is a capital asset.
- Investors have contributed the capital for the pension asset.
- There is no sound reason for denying investors a return on the pension asset.

Q. Does the mere existence of pension credits result in an automatic and substantial decrease to the cost of service benefiting ratepayers?

A. No. Under traditional utility regulation, utility rates are based on a test year cost of service, theoretically designed to balance the various components of the ratemaking equation. Once determined, those rates are generally considered just and reasonable until a moving party presents evidence that the utility is materially under, or over, earning the authorized return in support of revised rates. In general terms, the utility is considered to have recovered all costs recorded between rate cases and achieved a reasonable return on its rate base investment.

However, it is not uncommon for regulators to be presented with issues associated with accounting changes (e.g., transition from pay-as-you-go to FAS106 accrual accounting for OPEB costs, adoption of FCC Part 32 capital to expense shifts), cost deferrals (e.g., storm damage, demand-side management costs), amortization requests (e.g., depreciation reserve deficiency, workforce reduction program costs) or tracking mechanisms (fuel cost trackers) that deviate from this general framework. If the mere recording of a transaction

meant that ratepayers symmetrically funded increases and benefited from decreases in expense, there would seem to be no need for the deferral, cost tracker or amortization issues that arise in utility regulation. The fact is that such issues do arise and have existed for many years. Rather than dismissively reject these requests, regulators typically review the facts and circumstances unique to each situation and determine whether the regulatory treatment requested by the utility should be accepted, rejected or modified.

The pension asset is no different. While negative pension credits have been recorded since the late 1980's, the question is whether Arizona ratepayers have adequately participated in the reduced expense to support rate base inclusion of the pension asset. In other words, have negative pension costs been included in the cost of service or somehow separately flowed through to customers "as recorded" each year since the adoption of FAS87? If the ratepayers are not the beneficiaries of those pension credits, then the Company and its investors are the only remaining parties that could have benefited from the cost reductions through higher earnings than would have otherwise been achieved.

While Mr. Grate has alleged that investors have "supplied capital to fund the pension asset," he has provided no factual support for the $97 million pension asset Qwest proposes to include in intrastate rate base, gross of ADIT reserves. Such treatment is appropriate only if it is reasonably demonstrated that a comparable level of cumulative pension credits have been flowed through to the benefit of Qwest's Arizona ratepayers.

Q. Do you believe that ratepayers receive the benefit of pension credits merely as a result of recording the negative pension costs?

A. No. The mere act of recording costs or credits does not conclusively demonstrate "who" may have funded, or benefited from, the pension credits. Since Qwest has sought rate base treatment of the pension asset, Qwest should bear some burden to demonstrate that such inclusion is proper. When rate base inclusion is premised on the "as recorded" concept (i.e., the company recorded credits so ratepayers have benefited), I disagree with reliance only on that premise for determining ratepayer <u>benefit</u> and rate base inclusion. Absent some attempt to assess ratepayer participation in those cumulative pension

credits, Qwest's rate base proposal would charge ratepayers with a rate base return on funds they may have never received – unnecessarily benefiting Qwest and its investors.

Q. Are you suggesting that the Commission engage in retroactive ratemaking?

A. No, absolutely not. I do not propose or suggest that Qwest should pay back past excessive profits or recoup past operating losses, as implied by Mr. Grate.[58] Instead, the retrospective review would solely be used to gauge the extent of benefits received by ratepayers or retained by investors in determining the amount of the pension asset balance includable in rate base.

Q. Please explain.

A. Prior to FAS87, the pension costs charged to expense/capital accounts and contributed to the pension fund were equal. Subsequent to FAS87, the Company has recorded negative pension costs and made no further pension fund contributions. In order to establish whether ratepayers have inappropriately benefited to the investors' detriment, neither the act of recording costs nor making contributions necessarily establish the pension cost amount ratepayers have "invested" in or "benefited" from through cost of service.

In assessing whether these pension credits have inured to the benefit of ratepayers to the detriment of investors, Qwest would need to demonstrate that the cumulative pension credits reasonably flowed through to its Arizona intrastate customers equal or exceed the pension asset it proposes to include in rate base. In past Qwest proceedings, I have stated that, based on the results of my analyses, Qwest could not demonstrate substantial ratepayer benefits to support inclusion of the pension asset in rate base. While my prior testimonies were accurate, updated analyses now indicate that Arizona ratepayers have received sufficient pension credit benefits to support rate base inclusion.

Q. At page 117 of his direct testimony, Mr. Grate contends that your approach "was not used for any other element of rate base." How do you respond?

[58] See Grate direct testimony, page 118, footnote 67.

A. I agree that this approach is generally not used for other elements of rate base. However, that criticism fails to address the key points of concern relative to this issue:

- Have ratepayers benefited from the pension credits?
- If so, by how much?
- Is the cumulative extent of those benefits enjoyed by ratepayers sufficient to include the pension asset in rate base?

The implementation of FAS87 resulted in a significant shift in accounting method from a cash basis to an accrual basis – a shift implemented by the Company for accounting purposes outside the context of a rate proceeding. This shift resulted in Qwest recording negative expenses (i.e., pension credits) for fifteen of the past seventeen years. Because the existence of these pension credits are the sole cause of a pension asset being recorded, I believe that it is responsible and reasonable for regulators to question the extent to which ratepayers, not the Company and its investors, have enjoyed the benefits of those annual pension credits.[59]

In this context, Mr. Grate (direct testimony, p. 119) discusses the subject of cost recovery and general ratemaking principles, including the following excerpt:

> Under widely accepted ratemaking principles, the recorded balances for accumulated deprecation [sic] are included in rate base without imposition of any test to prove that shareholders actually recovered the depreciation expense accruals that created the accumulated depreciation balances. There is no rational basis in regulatory accounting or law for asserting that the pension asset should be subject to a recovery test (especially one that is impossible to satisfy) before it too is included in rate base.[60]

It is rather curious that Mr. Grate would suggest that it is improper and irrational to subject any cost of service item to a "recovery test." Although Staff's recommendations on the regulatory treatment of other postretirement benefits (OPEBs) are more fully addressed in another section of my direct testimony, Qwest's own accounting for this item has used just such a "recovery test" since the early 1990's resulting in the Qwest denying Arizona ratepayers any participation in external OPEB fund assets or earnings on

[59] A benefit-burden test.
[60] Grate direct testimony, page 119.

plan assets – because this Commission continued pay-as-you-go ("PAYGO") regulatory accounting for OPEB costs, rather than adopt accrual accounting in the early 1990's.

As indicated in the "Test Year" section of my testimony, all components of the ratemaking equation change over time – revenues, expenses and investment. As each component changes, a utility should have a reasonable opportunity to achieve its authorized return (i.e., not materially over or under earn), so long as the components remain in relative balance or changes to one component are mitigated or offset by changes to the other. I generally agree with Mr. Grate that the prohibition against retroactive ratemaking presumes that recorded costs are assumed to be recovered, regardless of explicit inclusion in cost of service.[61] This presumption holds the utility accountable for incurred costs and prevents a potentially abusive process of collecting past earnings deficiencies from current and future ratepayers.

Since adoption of FAS87, the amount of pension credits recorded by Qwest has varied significantly from year to year.[62] In the absence of rate case activity or some mechanism to flow the volatile annual pension credits through to benefit ratepayers, FAS87 pension accounting may have resulted in large pension credits increasing utility income and investor returns. Contrary to implications otherwise, Staff's evaluation of this issue is <u>not</u> designed, intended nor does it result in a retrospective inquiry of past earnings to impose a surcharge for past under-recoveries or a refund for past over-recoveries. Instead, Staff's approach is designed to evaluate, based on available information, whether it is reasonable to assume that ratepayers have sufficiently enjoyed the benefits of the ever fluctuating pension credits (supporting rate base inclusion of some portion of the pension asset) or whether the resulting earnings benefits have been retained by investors (supporting the rate base exclusion).

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[61] Qwest Adjustment PFA-02 (OPEB pro forma) values the APBO and selects an amortization period assuming adoption of accrual accounting in 2003, contrary to this very presumption.

[62] The amount of annual pension costs recorded since 1987 have ranged from a positive [redacted] to a negative (credit) of [redacted].

Q. Since Qwest's adoption of FAS87, how does the amount of pension costs included in cost of service compare to the pension credits recorded by the Company?

A. Although it is not possible to precisely quantify the amount of accumulated net pension recoveries from or benefits provided to ratepayers over the decades predating or following the adoption of FAS87, I have prepared a series of calculations which attempt to estimate the level of pension credit benefits ratepayers might have received since the adoption of FAS87. Relying on Company responses to discovery in Docket Nos. E-1051-93-183[63] and T-1051B-99-105,[64] the following table attempts to show the amount of pension credits that might have been flowed through to ratepayers in each proceeding immediately preceding or following the adoption of FAS87.

Arizona Intrastate – Net Pension Expense
(000's)

ACC Docket	Order Date		Ratemaking Pension Expense
84-100	1/10/86		$12,200
88-146	3/01/89	(a)	(600)
91-004	7/15/91	(a)	(9,900)
93-183	1/03/95		(9,000)
99-105	4/1/01	(a)	(13,719)

Source: Qwest response to Staff Data Request UTI 3-10.
Note (a): Resolved by negotiated settlement.

Using this information, I have prepared two analyses of the net pension credits that might have been flowed through to ratepayers. Both analyses cover the same time period, starting in 1987 and continuing through 2003. While similar in appearance, Appendices SCC-4 and SCC-5 are different in one material respect – how the amount of pension credits flowed through to ratepayers are determined when a rate proceeding is resolved by negotiated settlement, rather than by a regulatory decision in a litigated proceeding.

Appendix SCC-4 recognizes that three of Qwest's Arizona proceedings since the late 1980's (i.e., Docket Nos. E-1051-88-146, E-1051-91-004 and T-1051B-99-105) were

[63] Company responses to Staff Data Request Nos. 191, 386-388 (Docket No. E-1051-93-183).
[64] Company responses to Data Request Nos. UTI 3-12, UTI 20-5 & RUCO 28-3 (Docket No. T1051B-99-105).

resolved by negotiated settlement. Because of these settlements, Appendix SCC-4 assumes that the positive or negative pension costs included in the preceding litigated rate case would continue to be reflected in rates until the next litigated proceeding. Such an assumption would indicate that ratepayers may have provided Qwest with cumulative positive pension expense of $16.6 million, as compared to the negative $97.3 million of cumulative pension credits Qwest proposes to include in rate base.

In contrast, the analysis set forth in Appendix SCC-5 assumes that it is reasonable to consider all relevant information available to assess regulatory intent and estimate the amount of pension credits underlying negotiated settlements, in order to identify amounts included in rates and flowed through to the benefit of ratepayers. Under this approach, in spite of typical non-precedential language contained in settlement agreements, Appendix SCC-5 indicates that ratepayers may have participated in cumulative negative pension expenses exceeding $100 million, supporting rate base inclusion of the pension asset .

Q. Since these two analyses yield significantly different results, why are you recommending that Qwest be allowed to include the pension asset in rate base?

A. It may not be possible to accurately or precisely quantify the exact amount of cumulative net pension recoveries from or benefits provided to ratepayers, particularly over the decades predating the adoption of FAS87. Admittedly, these two analyses produce dramatically different Arizona-specific estimates of the pension credit benefits ratepayers might have received since the adoption of FAS87, due to the valuation treatment of settled rate proceedings. However, in past Arizona rate cases, both analyses consistently indicated that ratepayers had not yet received substantial cumulative benefits from the pension credits to support rate base inclusion of the pension asset. For the first time, the Arizona analysis depicted on Appendix SCC-5 shows that the situation has changed, at least when test year pension credits involving settled proceedings are considered.

Q. In describing Appendices SCC-4 and SCC-5, you indicated that three of the rate cases were resolved by negotiated settlement. Have you previously filed testimony that you

were unable to determine what amount of pension credits may have been flowed through to ratepayers as a result of the settlement process?

A. Yes. I have taken the position that, in assessing the amount of pension credits flowed through to ratepayers, only those orders which specifically address the various components of cost of service be considered. Settlements are typically non-specific, by design, and entail any number of compromises in the interest of reaching an acceptable resolution. By its very nature, a settlement agreement reflects a compromise that can often be valued in various ways, not necessarily reflecting the filed positions of any particular party.

However, on further reflection, the amount of pension credits recognized in the three Arizona proceedings resolved by negotiated settlement appear to have been uncontested, at least by Staff. As such, the amount of pension costs recognized in those proceedings would not have necessarily changed, even if each case been litigated. As a result, Appendix SCC-5 appears to better reflect ratepayer participation in the Arizona pension credits.

Q. Do you believe that all elements of the cost of service included in past rates should be reconciled with current cost levels to determine prospective rate treatment for each item?

A. No. As a matter of ratemaking policy, I do not recommend that the Commission rely solely on or otherwise reconcile past decisions in establishing cost of service for future periods. However, the consideration of past rate orders is indeed relevant in assessing whether investors have some claim to inclusion of the pension asset in rate base. As discussed above, Staff is recommending the inclusion of the pension in rate base.

VOICE MESSAGING – STATE DEREGULATED SERVICE

Q. What is the purpose of Staff Adjustments B-8 and C-24?

A. In direct testimony, Staff witness Rowell recommends Commission approval of Qwest's pending requests to deregulate both Voice Messaging Services and Intrastate Billing and Collection Services for Arizona intrastate regulatory purposes. Because of Staff's recommendation, Staff Adjustments B-8 and C-24 remove the effects of Voice

MRP
12/4/97
#13010

— BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH —

In the Matter of the Request of U S WEST COMMUNICATIONS, INC. for Approval of an Increase in its Rates and Charges.	)))	DOCKET NO. 97-049-08 REPORT AND ORDER

ISSUED: December 4, 1997

SHORT TITLE

1997 General Rate Case

SYNOPSIS

The Commission herein orders an increase in revenue requirement of $683,400. The cost of capital is set by the Commission at 11.5 percent rate of return on common equity and 9.76 percent rate of return on investment. The 1995 Legislature's direction to remove subsidies from rates by bringing them closer to cost of service is the basis for Commission decisions to increase the rate for residential basic local service by $2.80 per month, to reduce the rate for business basic local service by $1.88 per month, to reduce the charge for call waiting service by $1.50 per month, and to decrease the rates for both intrastate toll and switched access service.

income should be increased by $180, 961 to reflect this disallowance.

b. Membership Expense

The Division reviews Company expense incurred for employee membership and participation in civic organizations, referring to Docket No. 88-049-07, wherein we found that the costs of membership in civic organizations are not necessary to the provision of reliable utility service and are not to be recovered in rates. On this basis, the Division recommends removal of membership costs from test-year expenses. The Committee raises employee participation in chambers of commerce and civic organizations, as well as corporate sponsorship of Utah Musical Theater, Utah Summer Games, United Way and Ballet West events. While not critical of USWC for such support, the Committee asserts that shareholders should bear the costs. Removing these costs from the test year would increase rate making income by $13,573.

The Company believes that membership costs are an ordinary and prudent cost of doing business, recognized by the Internal Revenue Code as deductible expenses for federal income tax purposes. The Company maintains that the costs are prudently incurred and are reasonable given that they are less than .01 percent of total Utah intrastate costs. The Company asserts that ratepayers benefit from Company participation because, in the Company's opinion, civic and community organizations foster economic development and are a public service.

We see nothing new in this record that might cause us to abandon the regulatory position we articulated in Docket No. 88-049-07. The Company has the opinion that ratepayers benefit from Company participation in civic organizations, but this is an insufficient basis for a change in a regulatory policy decision. That certain costs are tax deductible has little bearing on necessary ratemaking treatment of an expense. We accept the Division's and the Committee's adjustment to exclude membership dues from revenue requirement. The adjustment increases rate making income by $13, 573.

c. Pension Expense, Financial Accounting Standard 87

Labor compensation includes pensions. Pension costs are a legitimate part of regulated revenue requirement. The amount of pension costs we determine reasonable is recovered by a utility through the cost-of-service based rates customers pay for utility services. From the revenues received from customers, the utility pays its pension costs. USWC does so through a pension plan incorporating a pension fund. The Company manages the pension plan, but the associated fund (Fund) is independently invested and administered. The Company makes periodic contributions to the Fund. These contributions, plus the Fund's investment earnings, must be sufficient to meet pension benefit obligations, determined on an actuarial basis. The Fund's investment earnings have been unexpectedly strong. As a result, no contributions have been required or made since 1987.

Financial Accounting Standard (FAS) 87 affects pension accounting. FAS 87 standardizes the calculation of pension costs by using a six-factor formula called "net periodic pension cost." The 'net' referenced in the name is reflective of the formula's consideration of the expected investment earnings of a pension fund and its actual earnings. If fund investment earnings are sufficiently high, the contribution to be made is zero. In circumstances like that experienced by

USWC's fund, the "net periodic pension cost" may be negative. This is so because actual investment earnings have not only eliminated the need for a current contribution, they have been so high that future pension contribution installments are not needed either. The Fund's resources exceed the expected obligations to be paid out from the Fund. This situation could continue during the lifetime of the employees covered by the pension fund, affected only by the Fund's subsequent actual investment earnings or modifications of the actuarial calculation of the pension Fund's pension obligations. Under FAS 87, when pension fund earnings are this high, a "pension credit," reflecting a "negative pension expense," arises. In accounting for pension expenses, a firm following FAS 87 that had a high-earning fund would record an accounting entry of a "pension credit," rather than a pension fund contribution. Through the continued process of recording "pension credits" (as determined by the "net periodic pension cost" formula) the firm would essentially be amortizing the pension fund's unexpected actual earnings to try to reach a balance between the pension fund's resources (including projected resources to be derived from future fund investments) and the pension fund's obligations (based upon an actuarial calculation of the payments to be made to employees covered by the fund during the employees' expected lifetimes).

When recording a "pension credit," the firm would also record an equal value "pension asset." One cannot record a "negative pension expense" unless one has a positive amount with which it matches. To the lay person, the "pension asset" is reflective of the pension fund's actual earnings being higher than expectations used in past calculations, a measure of how well the fund did over the earnings expectations. An additional complexity when accounting for pension costs under FAS 87 is the tax consequences of adopting FAS 87. With respect to a situation of an over funded pension fund, FAS 87 also entails the recognition of deferred taxes.

The Commission is responsible to determine whether an accounting standard is appropriate for regulatory, as distinct from financial, purposes. Typically, a party that advocates the use of an accounting standard or rule for regulatory purposes would do so in a rate case or a separate proceeding. It would present evidence of how the proposal would operate in ratemaking and explain why the proposal should be adopted for regulatory purposes. Other parties would be permitted to present their evidence in support or opposition. We would examine the accounting standard or rule for public interest implications and assure that adoption is warranted before permitting it to be used for ratemaking.

On January 1, 1987, the Company adopted FAS 87 for financial reporting purposes. In the Company's subsequent rate case, Docket No. 88-049-07, the Company did not request approval of FAS 87 for regulatory purposes. It did present an accounting adjustment in the 1988 test year used in that docket. A pension credit was presented to reflect the "negative pension expense" resulting from the Fund's overfunded status, resulting from pre-1987 contributions and the higher than expected investment returns on those contributions. The pension credit was adopted as the required adjustment to revenue requirement for that rate case as it was the only available remedy presented on that record. In the next rate case, Docket No. 90-049-06, this issue was resolved by stipulation. The stipulation in that docket is now explained by the Division to include pension credit to reduce expenses and associated deferred taxes that reduced rate base. Our orders in these dockets reflect

a lack of knowledge of deferred taxes, however, until Docket No. 92-049-05. Only then did we learn that FAS 87's use of pension credits gives rise to deferred taxes and pension asset entries.

The records made in the prior dockets had never developed a basis to examine FAS 87's use in the regulatory setting as no party had advocated its adoption. In Docket No. 92-049-05, we did accept the impact of deferred taxes, which resulted in a rate base reduction, but decided against the inclusion of pension asset to rate base. Our decision rested on an incomplete record, which we wished to rectify by calling for a comprehensive rate-making examination of FAS 87. The Company appealed our decision to include the pension credit but exclude the pension asset to the Utah Supreme Court. The Court upheld our decision, relying, in part, upon the inadequate evidence on FAS 87 presented to the Commission. *US West Communications v. Public Service Commission*, 901 P. 2d 270 (Utah 1995). This treatment of pension costs was reaffirmed in Docket No. 95-049-05, the next and most recent rate-case examination to occur. Our exclusion of the pension asset was again appealed by the Company to the Utah Supreme Court, but this appeal was withdrawn before consideration by the Court had begun.

We judged the records in all of these dockets inadequate and concluded that the regulatory implications of adopting FAS 87 for USWC's regulatory purposes were unclear. We called for comprehensive analysis. In our opinion, and certainly this reflects our intent, FAS 87 has not been adopted for regulatory application to USWC, in spite of the use of associated accounting entries of pension credit and deferred taxes. These entries were the only way permitted by the record to make appropriate pension cost adjustments. This reasoning was upheld by the Utah Supreme Court. Until the present Docket, the Company has agreed that FAS 87 has not been adopted here. In this Docket, the Company and the other parties have gone to considerable length to present a full explanation of FAS 87.

i. Positions of the Parties

The Company proposes to include pension asset in rate base so investors may earn the authorized return on capital it claims shareholders have provided to fund the pension asset. The Company argues that adoption into revenue requirement of pension credit and deferred taxes, but exclusion of pension asset, has resulted in uncompensated use of shareholder money. In testimony and accounting example, the Company seeks to show that shareholder monies have funded the pension asset. If we instead continue to exclude pension asset from rate base, the Company advocates removal of deferred taxes from rate base.

The Division objects to placing pension asset in rate base. It recommends removal of both pension credit and deferred taxes from revenue requirement. This results in the complete elimination of FAS 87's impacts in determining pension cost. This recommendation is based on the lack of comprehensive consideration of the regulatory applicability of FAS 87 to USWC. The Division notes that USWC has recently agreed to this treatment in Idaho and advocated it here in Docket No. 95-049-05. The Division maintains that inclusion of pension asset in rate base would allow USWC to recover past losses and is retroactive rate making, especially because the Company has been overearning during the ten-year period.

The Division also claims that USWC was not forthright with regulators during the time when it began FAS 87 pension accounting, and concludes that placing pension asset in rate base would charge ratepayers a return for the use of their own, not investor's, funds.

The Committee believes pension asset should be excluded from rate base because the Company cannot demonstrate that the full benefit of negative pension costs had been received by ratepayers as reduced cost of service. In the Committee's opinion, this is required to prove the Company's assertion that the pension asset has been funded by uncompensated use of shareholder funds. The Committee recommends removal of deferred taxes from rate base. The Committee testifies that the Company cannot demonstrate an uncompensated use of investor funds and that the record must, but cannot, show that ratepayers have received through pension credit and deferred tax entries enough to recoup the overrecovery by the Company of pension costs in earlier years.

Testimony suggests that each of the parties' claims, insofar as it depends on accounting for occurrences prior to the test year of this case, may have retroactive rate making implications.

ii. Discussion, Findings and Conclusions

In this Docket, USWC argues that we have already adopted FAS 87 for regulatory treatment of the Company. As shown above, the Commission has never directly addressed the adoption of FAS 87 in USWC rate cases. We have always found the records unsatisfactory. We have expressed our reluctance to adopt the Standard on these incomplete records. The Company presented testimony in Docket No. 95-049-05 that our decision to accept pension credit and deferred taxes in revenue requirement did not constitute adoption of FAS 87. In the present case, however, the Company contends that we have adopted FAS 87 for regulatory purposes through the adoption of the Uniform System of Accounts.

We adopted FCC Part 32, the Uniform System of Accounts, by rule R746-340-1 on December 13, 1988. We learn from the Company's testimony in this Docket that FAS 87 had been incorporated by the FCC in Part 32 before our rule was issued. The Company therefore asserts that we have adopted FAS 87 for rate making purposes. The Company's reliance upon the system of accounts is misplaced. Entries in numbered accounts used to track the Company's operations is only the beginning, not the end of ratemaking. If there were no review of the harmony and consistency between the accounting entries and the policies and goals pursued in ratemaking, there would be no adjustments to the test-year data when setting rates in general rate cases. One would simply take the results shown in the accounts as the basis for the revenue requirement and set out to establish rates to recover the recorded expenses, pausing, perhaps, to ponder only the prudence of incurring the recorded expenses. There is a difference between accounting and ratemaking. Accounting will deal with the recording of the operations of the Company. Ratemaking deals with applying the results of the operations to achieve public policy and public interest goals to arrive at rates which balance the interests of the Company and ratepayers consistent with statutory and constitutional directives. Accounting rules are applicable in general and are not intended to be the final determination of the specific circumstances encountered in ratemaking. *Re Sierra Pacific Power Company*, 73 PUR4th 306 (1985).

Simply stated, the ratemaking question is, how much pension cost is appropriate for recovery? The answer, given by standard regulatory practice, is, the test-year amount determined legitimate and reasonable. Prior to 1987, this would have been the amount of the periodic contribution to the Fund. But from 1987 forward, including the 1996 test year, no contribution has been required. The contributions of previous years, recovered in rates, plus unexpected investment earnings, have eliminated the need. When contributions fell to zero, the required regulatory decision is an appropriate reflection of that fact in determining the Company's revenue requirement. After 1987, however, the Company presented the adjustment to pension cost as a FAS 87 pension credit, an entry necessitated by negative pension expense. As the Company now explains, "The pension expense accounting rules in effect prior to SFAS 87 did not allow for pension credits. . . . Under those rules, a pension credit was simply not possible; only a zero or a positive pension expense could be accrued." Thus, in Docket No. 92-049-05, we stated, "Pension fund earnings have been unexpectedly favorable during recent years, making reduction in pension expense, termed the 'pension credit,' necessary." We have treated pension credit as the revenue requirement adjustment we would have made prior to FAS 87 upon discovering an overfunded Pension Fund.

USWC builds upon our past use of pension credits and deferred taxes in revenue requirement calculations. It now argues that failure to incorporate all of the accounting aspects of FAS 87 has deprived its shareholders of a reasonable return on their investment. Specifically, it argues that past failure to incorporate the pension asset aspect of FAS 87, while including the pension credits and associated deferred taxes, has prevented shareholders from earning a return on the pension asset. Since shareholders are unable to withdraw that portion of the Fund representing the overfunded amount, shareholders should be allowed to earn a return on those funds. (We must note that the inability of shareholders, or, for that matter, ratepayers or anyone else who is not a covered employee, to access the Fund is a result of federal law and regulation. It is not a result of any regulatory policy or rule of the Commission.) Thus the Company advocates, in this proceeding, the inclusion into rate base of the pension asset, the sum of pension credits since 1987. Through testimony, the Company presents an accounting explanation of how, in its view, our post-1987 treatment of pension expense has produced ratepayer benefit at shareholder expense. We believe the Company's claim that shareholders' funds have been used without compensation must be judged by an earnings, not a single-item accounting, test. The claim would have no merit if actual earnings from Company operations equaled or exceeded the authorized return. Regulation assumes that over time, through a succession of rate cases, the risks of the Company over- or underearning in periods following rate cases will be borne equally by shareholders and ratepayers. A rate case is premised upon test year over- or underearnings, not alleged failure to recover a single expense or investment. This means we do not permit 'single-item rate cases,' but use rate cases to examine the full range of revenues, expenses and investments. This is the process by which regulation seeks a just and reasonable end result, measured by the Company's actual performance under a rate-of-return constraint. The end result is not whether a particular item of expense could be said to have been recovered (in the sense that whereas one amount of it had been allowed in revenue requirement, a different amount of it was afterwards found to have been incurred). The Division

testifies that USWC's earnings equaled or were near allowed return since 1987. The history of rate cases during the period bears this out as only one resulted in a revenue requirement increase. The Company enters testimony taking the contrary, or underearning, view. We reject this contention because it fails to include all standing regulatory policy adjustments decided in previous cases. The Division's estimate contains these and is the one on which we rely.

The Company has not demonstrated a failure to earn the allowed return. The Company might argue that had pension asset been included, earnings would have been correspondingly lower. Even if such inclusion would have reduced earnings such that the Company did not earn its authorized return in the past, we could not use these past underearnings as the basis to include pension asset in this docket. We are barred from doing something today to make up for actions taken in the past. *Utah Dept. Of Business Regulation v. Public Service Commission*, 720 P.2d 420 (Utah 1986). Retroactive rate making is a bar with few exceptions. *MCI Telecommunications Corp. v. Public Service Commission*, 840 P.2d 765 (Utah 1992). USWC had opportunity to appeal our past treatment of pension costs if it indeed deprived shareholders of their required return. If USWC did not appeal, withdrew appeals, or lost on appeal, we cannot now fashion a remedy to make the Company whole, assuming, arguendo, the underearning premise. We must also reject the Committee's position on this same basis. The Committee maintains that our past actions have been insufficient to compensate ratepayers for the over collection of pension expense included in past rates. The Committee's exercise demonstrates the difficulty of attempting to reconcile the funds necessary to meet the Fund's pension obligations with a portion of the revenues received from the consumption of utility service in rates which have included a pension expense in their formulation. The magnitude of the overpayment is disputed and the Committee acknowledges that precise quantification is impossible. But the bar of retroactive rate making applies when ratepayer interests have suffered from our past decisions, just as it is a bar to shareholder interests.

Our decision on the adoption of FAS 87 for regulatory purposes is complicated by the 1995 Telecommunications Reform Act (the 1995 State Act) which ends standard rate-case procedure with the present Docket. This means that whatever pension cost is factored into rates today will remain there indefinitely, given the upcoming rate ceiling and price cap regimes that the Act mandates. The present record does present an explanation of FAS 87's process of calculating pension cost. As shown by the present record, there is conflicting evidence of the ratemaking impact on shareholder and ratepayer interests if FAS 87 is adopted for USWC's regulatory purposes. From our prior experience in considering the regulatory use of FAS 87 for Utah Power and Light, we are aware that it is not simply a question of adopting FAS 87. In the case of Utah Power and Light, we did adopt the regulatory use of FAS 87. But we established qualifications and specific conditions to address the untoward impacts that we there recognized would occur in rate making for that utility. We are not able to do the same on this record for USWC. A misstep in this Docket cannot be corrected in a future rate case. We will adopt the Division's recommendation on the FAS 87 issue. We reject FAS 87 for regulatory accounting of pension costs. Hence, we will not recognize any FAS 87 based accounting entries, pension credit, pension asset or deferred taxes, in

determining the revenue requirement in this Docket. Because pension credit and associated deferred taxes were included in the test-year data, our decision on this issue requires an adjustment to increase expenses, which after accounting for income taxes, decreases income by $92,418, and requires an adjustment to increase rate base by $8,436,653. Thus, we do not use FAS 87 for ratemaking involving USWC.

d. Plant Under Construction

USWC proposes to change the method of accounting for telephone plant under construction (TPUC) to conform with both GAAP and ratemaking treatment adopted by the FCC in 1996. The Company proposes adoption of the revenue requirement offset method, an accounting treatment where short- and long-term TPUC is included in rate base during the construction period. The revenue requirement offset method continues a long-standing regulatory practice, commonly referred to as an Allowance for Funds Used During Construction (AFUDC), where interest expense for construction financing is recognized as a capitalized construction cost properly includable in rate base during the construction period. For ratemaking purposes, AFUDC is treated as a cost-of-service credit, thereby reducing test-year revenue requirement by balancing TPUC, AFUDC and interest expense accounts to prevent double recovery of capitalized interest.

USWC contends that current Utah ratemaking treatment does not allow full recovery of financing costs for TPUC. The Company asserts that insofar as GAAP, as embodied in Financial Accounting Standard 34 and adopted by the FCC, establishes average debt financing cost as the basis for calculation of AFUDC, the Company is unable to recover the difference between average cost of debt and the authorized return on capital during the construction period. The Company presents a hypothetical example in an exhibit intended to illustrate that the capitalization method of AFUDC accounting, unlike the revenue requirement offset method and the rate base method,[1] denies investors an opportunity to fully recover financing costs for TPUC. USWC attests that the AFUDC credit to revenue requirement under the revenue requirement offset method mitigates any equity concern associated with ratepayers provision of a rate-base rate of return on debt and equity capital employed for incomplete construction. As further evidence for securing a return on equity for construction in progress, USWC presents a condensed regulatory cash flow analysis showing negative cash flow, net of dividend payments, over a six-year period ending 1996. The analysis shows that 64.1 percent of net operating cash flow was available to fund capital expenditures during the test period.

The Division and the Committee assert that USWC suffers no difficulty attracting capital in financial markets and that Utah cash flows are adequate to support construction expenditures. They oppose adoption of the revenue requirement offset method claiming it will result in an artificial rate increase of $6.2 million. Both advocate continued use of the capitalization method of accounting for TPUC asserting that it provides both full cost recovery and a return on capital,

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[1] The rate base method is a third method of accounting for TPUC where construction work in progress is included in rate base during the construction period and interest is treated as a non-capitalized pretax operating expense.

SERVICE DATE
AUG 16 1994

NOTE: An important notice to parties about administrative review appears at the end of this order.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petitions of U S WEST COMMUNICATIONS, INC. Relating to the Effective Date for the Accounting Change to Implement SFAS 106, Post Retirement Medical Benefits, and a Ratemaking Adjustment for the Pension Asset	DOCKET NO. UT-930074 DOCKET NO. UT-930307
In the Matter of the Petition of U S WEST COMMUNICATIONS, INC. Relating to the Implementation of SFAS 112, Employers' Accounting for Post Employment Benefits	DOCKET NO. UT-931378 FINDINGS OF FACT, CONCLUSIONS OF LAW AND INITIAL ORDER

PROCEEDINGS: This proceeding consists of two petitions by U S West Communications relating to the adoption and implementation of new accounting procedures promulgated by the Financial Accounting Standard Board (FASB), and one petition relating to the inclusion of a pension asset in ratebase. Docket UT-930074 is the company's request to adopt Statement of Financial Accounting Standards No. 106, Employers' Accounting for Post-Retirement Benefits Other Than Pensions, (SFAS 106) effective January 1, 1992. Docket UT-930307 requests Commission authorization to include a pension asset in ratebase on an on-going basis effective with the 1992 sharing year. Docket UT-931378 requests Commission approval of the company's use for accounting purposes of SFAS 112, Employers' Accounting for Post-Employment Benefits, effective January 1, 1993. The matters were consolidated by order of the Commission and set for hearing.

HEARINGS: Hearings were held on these petitions in Olympia before Administrative Law Judge Lisa A. Anderl on November 1, 1993, and May 16 and 17, 1994. The parties filed briefs by July 8, 1994.

APPEARANCES: U S West Communications, Inc., (USWC or U S WEST) was represented by Edward T. Shaw, attorney, Seattle. The Commission Staff was represented by Steven W. Smith, assistant attorney general, Olympia. The public was represented by Robert F. Manifold, assistant attorney general, Seattle. Intervenor MCI Telecommunications Corporation (MCI) was represented by Brooks Harlow, attorney, Seattle. Intervenor

TRACER was represented by Arthur A. Butler, attorney, Seattle. Intervenor Telephone Pioneers of America was represented by Harold Grimes, chapter officer. Intervenor Washington Independent Telephone Association (WITA) was represented by Richard A. Finnigan, attorney, Tacoma.

SUMMARY: This initial order recommends denial of U S WEST's petition for early adoption of SFAS 106 and the petition to include a pension asset in rate base. This order would grant the petition to adopt SFAS 112 for ratemaking purposes effective January 1, 1994.

MEMORANDUM

Background

On January 20, 1993, U S WEST filed a petition in Docket UT-930074 requesting Commission approval of the company's request to adopt Statement of Financial Accounting Standards No. 106, Employers' Accounting for Post-Retirement Benefits Other Than Pensions, (SFAS 106) effective January 1, 1992. The Commission had previously approved implementation of SFAS 106 effective January 1, 1993. Early adoption of SFAS 106 would result in the company funding $25 million for 1992; $10.9 million would be ratepayer sharing dollars under the company's alternative form of regulation (AFOR).

On March 23, 1993, U S WEST filed a request in Docket UT-930307 for Commission authorization to include a pension asset in rate base on an on-going basis effective with the 1992 sharing year. U S WEST's calculation of this asset is $67 million. The impact on ratepayers for 1992 would be $4 million.

On November 12, 1993, U S WEST filed a request in Docket UT-931378 for Commission approval of the company's use for accounting purposes of SFAS 112, Employers' Accounting for Post-Employment Benefits, effective January 1, 1993. If granted, this accounting petition would involve a one-time catch up entry of $9 million on the company's books, to reflect the liability for disability and worker's compensation claims.

The matters were consolidated by order of the Commission and set for hearing. The parties prefiled all their direct and rebuttal testimony. Hearings for cross-examination of that testimony took place on May 16 and 17, 1994, in Olympia, Washington. U S WEST presented three witnesses: Margaret Wright, the state finance director; Wayne Borkowski, CPA and adjunct professor at Pacific Lutheran University; and Gene Wickes, an actuary with Towers Perrin. Commission Staff's witness was Teresa Pitts, policy specialist. Public Counsel and TRACER jointly sponsored Steven Carver, a consultant with

Utilitech, Inc. The other intervenors did not present any witnesses.

The parties filed briefs, which were due on July 8, 1994. Staff, Public Counsel, TRACER, and MCI oppose the petitions. U S WEST and WITA urge the Commission to grant the petitions. Telephone Pioneers of America did not file a brief.

SFAS 106 / DOCKET NO. UT-930074

This petition is the company's request for Commission approval to adopt Statement of Financial Accounting Standards No. 106, Employers' Accounting for Post-Retirement Benefits Other Than Pensions, (SFAS 106) effective January 1, 1992. The Commission had previously approved implementation of SFAS 106 effective January 1, 1993.[1]

Post-retirement benefits other than pensions are benefits such as health insurance which U S WEST and many other companies provide to retirees and dependents. These benefits have, in the past, been accounted for on a pay-as-you-go basis, with the company recognizing the liability when payment is incurred. The FASB, in promulgating SFAS 106, recognized that the liability for these benefits is generated because of the retiree's employment and ordered that the liability must be accrued on the company's books over the course of the employment during which the benefits are earned. The FASB has required companies to implement SFAS 106 effective with fiscal years after December 15, 1992 and has encouraged earlier adoption. The FCC has authorized companies to implement SFAS 106 effective on or before January 1, 1993.

Implementation of SFAS 106 involves a catch up entry for benefits earned to date, and the ongoing annual obligation. At the time SFAS 106 is adopted, the company faces a catch up entry, also known as the transition benefit obligation (TBO) which represents the amount of vested post-retirement benefits other than pensions which have been earned by employees to date. The company had not booked this liability in the past because on a pay-as-you-go basis it was not required to. SFAS 106 allows the company to take this liability all at once (as it did for

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[1] The Commission approved a settlement agreement between the company and Staff on January 16, 1990, in Dockets U-89-2698F and U-89-3245-P. Paragraph 18E of that agreement provides that if the FCC and the FASB approve or mandate SFAS 106, the company could petition for approval to make accruals and the Staff agreed not to oppose accruals in principle. Staff did not oppose the implementation of SFAS effective January 1, 1993.

financial accounting purposes) or to amortize it over a period no longer than 20 years or the remaining service life of the employees, which is what the company proposes for ratemaking. The other element is the current or annual liability for the post-retirement benefits other than pensions. This amount is calculated actuarially and is subject to annual true-ups to reflect actual events.

The company's main reason for advocating the early adoption of SFAS 106 is that it is good accounting, that early adoption was chosen for financial reporting purposes and that the regulatory treatment should be consistent with and reflect this reality. The company's other reason for requesting early adoption of SFAS 106 is because it contends that such early adoption would cost less in the long run and would thus benefit the ratepayers. Early adoption would result in the company funding $25 million for 1992; $10.9 million of that would be ratepayer sharing dollars under the company's alternative form of regulation (AFOR).

This order rejects the company's argument that early adoption should be approved in order to be consistent with the method chosen for financial reporting purposes. First, regulatory accounting is not the same as financial accounting. Everyone, including the FASB, recognizes that what may be mandated for financial reporting purposes may be treated differently for regulatory or ratemaking purposes. SFAS 71 was adopted to address this particular situation.[2] Secondly, the company's desire for consistency is in itself inconsistent -- the company does not ask that the entire TBO be written off in 1992, as it did for financial accounting purposes.[3] The company proposes that the TBO be amortized over 17.3 years. The company's consistency argument is not persuasive.

As Public Counsel points out, the standard for analyzing this petition should be whether a grant of the petition is consistent with the public interest. In order to establish public interest, the company has emphasized the potential

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[2] This statement, entitled "Accounting for the Effects of Certain Types of Regulation", addresses deviations from generally accepted accounting principles for regulated firms and describes booking and reporting guidelines when ratemaking methodology differs from generally accepted accounting principles.

[3] This order would likely recommend approval of early adoption if the company's desire for consistency manifested itself in a willingness to write off the TBO for ratemaking purposes as it did for financial accounting purposes, but that is not at issue here.

ratepayer benefit of early adoption -- calculated savings of $12-$24 million over the next 17 years because of the earlier funding of the obligation. However, Staff and Public Counsel argue that these benefits are speculative at best, and in any event would not begin to accrue until 1998, which is the break even point.

Staff further suggests that if the petition is granted, it should be granted only on several conditions, including that the company be required to amortize the TBO over 20 years instead of 17.3, that the amount of the obligation be recalculated based on the company's current defined contributions plan, and that the medical plan asset be recalculated. The company opposes these conditions and argues that the level of expense is not at issue in this proceeding. This initial order will not recommend granting the petition for early adoption, so the conditions are not at issue. This order agrees that these issues may be better explored in a ratemaking or revenue requirements proceeding.

On the question of whether the petition for early adoption is in the public interest, this initial order concludes that the benefits to the ratepayer are highly speculative and that they do not outweigh the initial cost of funding the obligation a year earlier. The calculation of $12-$24 million in savings to the ratepayer is based on traditional, rate base, rate of return regulation. However, no one at the hearing seriously suggested that U S WEST would be regulated in that way in the future. For the past four years U S WEST has been regulated under an alternative form of regulation. It seems likely that future regulatory frameworks will continue to evolve to accommodate an ever more competitive market for this industry.[4]

This order concludes that US West has not established that there would be any ratepayer benefit to early adoption. There would be a certain reduction in sharing dollars of $10 million for 1993. Early adoption of SFAS 106 is not consistent with the public interest. The petition should be denied.

PENSION ASSET / DOCKET NO. UT-930307

On March 23, 1993, U S WEST filed a request in Docket UT-930307 for Commission authorization to include a pension asset in rate base on an on-going basis effective with the 1992 sharing

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[4] Several parties cited the Commission's policy statement to US WEST in a letter earlier this year, suggesting that price cap regulation will be the direction of the future. This order cannot ignore that clear statement of the likely future regulatory form and the probability that U S WEST will not be subject to rate of return regulation.

year. U S WEST's calculation of this asset is $67 million. The impact on ratepayers for 1992 would be a reduction in sharing dollars of $4 million.

The pension asset

The parties agree that since 1987 the company has had money in its pension fund in excess of that which is required for financial reporting purposes. The company has not contributed any money to the pension fund since that time, but an excess amount still exists. This has created pension expense credits and a corresponding pension asset. In general, the reason for this is that the pension fund performed and provided returns far beyond U S WEST's expectations.

The company claims that it must be allowed to earn a return on the pension asset, or it would be unfair to shareholders, who the company says have provided the funds which are the pension asset. The company argues that the pension credits benefit ratepayers by reducing revenue requirement and therefore rates and/or increasing sharing. This benefit to the ratepayer is viewed by the company as the buying back or reimbursement of the dollars which originally created the asset. The company concludes that the asset is thus shareholder provided and argues that the shareholders must be allowed to earn a return on this asset.

Staff argues that during the time up until 1987, contributions to the pension fund were entirely recovered in rates and that the pension asset was created by ratepayer provided funds, not shareholder funds.

Aside from this argument, Staff argues more generally that the pension asset is only one element of a working capital analysis. To the extent that miscellaneous assets are shareholder supplied, they are properly included in ratebase as investor supplied working capital. The company has not done a working capital analysis and therefore cannot say what a total analysis would produce in terms of inclusion in ratebase. Even accepting that an increase in this asset represents an increase in stockholders' investment, staff rejects this piecemeal approach, and argues that investor-supplied working capital should be reviewed on an all inclusive basis.

Public Counsel and TRACER argue that quantification of net pension recoveries from or benefits provided to ratepayers is impossible. These parties point out that the company's calculations are based on assumptions regarding cost of service and the recovery of pension costs which are unsupported conjecture. They urge the Commission to deny this petition.

Assuming, arguendo, that this is the appropriate proceeding in which to consider inclusion of a pension asset, the first thing that must be established is that the asset is shareholder supplied. The company argues that the ratepayers have benefitted from reduced rates or additional sharing as a result of the pension credits on U S WEST's books and that the ratepayers have essentially been reimbursed for their contributions to the pension fund. However, because the shareholders do not have access to the cash in the pension fund, they should at least be allowed to earn a return on this asset.[5] Staff and Public Counsel argue that contributions to the pension fund were recoverable in rates and the asset is ratepayer supplied, not shareholder supplied. Additionally, Mr. Carver's testimony, and Public Counsel on brief, point out that any level of reimbursement is not quantifiable and cannot be determined with any certainty. As discussed below, this order concludes that this is not the proper proceeding in which to consider this request. However, if a decision on this issue were required, this order would adopt the position of Public Counsel that the amount is not quantifiable and therefore deny the petition on that basis.

This order concludes that the company should not be allowed to include a pension asset in ratebase as requested in this petition. The inclusion in ratebase of this asset, even if otherwise appropriate, should be done as one element of a total working capital analysis. To do otherwise would allow the company to pick and choose working capital adjustments, petitioning for inclusion of increased amounts without necessarily considering whether there have been offsetting decreases. The petition should be denied.

Deferred Taxes

The other issue which comes up in connection with the pension asset is the company's treatment of the deferred taxes associated with that asset. Those taxes total $23 million as of 1993. The company has always normalized those deferred taxes, which then become a ratebase offset.

Public Counsel suggests that if the Commission denies this petition, it might be appropriate to eliminate the accumulated deferred taxes as a ratebase offset. Staff argues

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5 Even if this order were to accept the company's analysis, which it does not, only $39 million of the asset is argued to have been paid back to the ratepayer -- it is not clear how this would justify inclusion in ratebase of a $67 million pension asset.

that the company is required by rule[6] to be flowing through those tax benefits, as no exceptions to the flow-through requirement have been granted by the Commission, nor is normalization required by federal tax regulations. Staff requests that the company be required to flow through the tax benefits in the 1993 earnings for sharing. The company did not specifically address the issue of normalization versus flow-through on brief, but does seem to agree with Public Counsel's position regarding removal of the deferred taxes as a ratebase offset.

It appears that the company is improperly normalizing the deferred taxes associated with the pension asset and should be required to flow through those benefits beginning with the 1993 earnings for sharing. There is no support or justification on this record for normalizing the tax timing benefits as the company has done. This order also concludes that to the extent these taxes have been deferred and not flowed through to the ratepayers in the past, they should, in the appropriate proceeding, be subtracted from ratebase.

SFAS 112 / DOCKET NO. UT-931378

On November 12, 1993, U S WEST filed a request in Docket UT-931378 for Commission approval of the company's use for accounting purposes of SFAS 112, Employers' Accounting for Post-Employment Benefits, effective January 1, 1993. If granted, this accounting petition would involve a one-time catch up entry of $9 million on the company's books, to reflect the liability for disability and workmen's compensation claims.

The FCC has ordered U S WEST to adopt SFAS 112 effective January 1, 1994. The FASB has required SFAS 112 accounting for all fiscal years beginning after December 15, 1993. The expenses involved in this petition are those expenses associated with claims wherein the disabling event has already occurred, so that the fact of the obligation is certain. The amount of the obligation, for medical expenses, disability payments, etc., varies with each claim and must be estimated.

In support of its petition, U S WEST argues that it is merely requesting permission to adopt accounting practices that reflect reality. The accrual required by SFAS 112 is, U S WEST argues, a superior and more accurate way to keep its books for these legitimate and unavoidable expenses and should be adopted for that reason, not avoided because of impact on revenue requirement. Nor would U S WEST want to amortize the impact over

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6 WAC 480-120-031(1)(f) provides that unless specific exceptions are granted or required, the company shall flow-through tax benefits to the extent allowed by federal tax regulations.

three to five years, as suggested by Mr. Carver, because the impact is small and does not need to be phased in. U S WEST concludes that the Settlement Agreement clearly contemplates that necessary and desirable accounting changes should be made as they come up during the life of the AFOR and that this petition should be granted to comply with the letter and spirit of that agreement.

Staff and Public Counsel oppose this petition on the grounds that the amounts cannot be reliably estimated and that the accrual is nothing more than an accounting entry based on questionable projections.[7] These parties also point out that the $9 million will not be placed in a separate account to fund future obligations, that the company will in fact continue to pay the obligations as they are incurred, and that the annual on-going expense will not change significantly as a result of the transition from pay-as-you-go to accrual accounting.

This order concludes that it is appropriate to allow U S WEST to adopt SFAS 112 as set forth in its petition, with the modification that the effective date should be January 1, 1994. This later effective date is consistent with FASB and FCC required implementation, and no reason was advanced for early adoption. On the merits of the petition, this order concludes that the accrual method is appropriate for the disability and worker's compensation liabilities[8] where the disabling event has already occurred. Although future amounts must be estimated, and necessarily are not exact or certain, the amounts are subject to reasonable projection.

Having discussed the oral and documentary evidence concerning all material matters, and having stated findings and conclusions, the Commission now makes the following summary of those facts. Those portions of the preceding detailed findings pertaining to the ultimate findings are incorporated herein by this reference.

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[7] Staff notes that the actuarial report underlying these estimates contains cautions about the uncertainty of estimates and the possibility of unanticipated events which might cause the actual results to vary significantly from the estimates.

[8] Adoption of SFAS is approved in this order only as to the items and methods of calculation proposed in this proceeding. This is specifically limited to the company's long- and short-term disability plans, disability pension plan and self-insured worker's compensation. It does not include other items which fall under the general heading of post-employment benefits, including severance benefits, job training and other items.

FINDINGS OF FACT

1. The Washington Utilities and Transportation Commission is an agency of the state of Washington vested by statute with authority to regulate rates, services, facilities, practices, rules, accounts, securities, and transfers of public service companies, including telecommunications companies.

2. Petitioner U S WEST is engaged in the business of providing telecommunications services to customers in the state of Washington as a public service company.

3. The company has requested adoption of SFAS 106 for ratemaking purposes effective January 1, 1992 instead of the previously approved January 1, 1993. With early adoption, the company would fund an additional $25 million in 1992, reducing sharing available to ratepayers by $10.9 million. Potential net benefits to ratepayers from early adoption would not accrue, if at all, until 1998. The potential benefit to ratepayers, as calculated by the company, is $12-$24 million over the next 17 years. These benefits are not likely to occur as calculated by the company, as the method used assumes circumstances not likely to continue through the next 17 years.

4. The company has requested inclusion in ratebase of a pension asset in the amount of $67 million on an on-going basis effective with 1992. The pension asset does exist in that amount as a result of an excess amount in the company's pension fund. The pension asset is one element of total working capital. No total working capital calculation was presented in this proceeding.

5. The company has requested adoption of SFAS 112 effective January 1, 1993. The FASB has required SFAS 112 accounting for all fiscal years beginning after December 15, 1993. The expenses involved in this petition are those expenses associated with claims wherein the disabling event has already occurred, so that the fact of the obligation is certain. The amount of the obligation, for medical expenses, disability payments, etc., varies with each claim and must be estimated; the amounts are subject to reasonable projection. No reason was advanced for early adoption.

CONCLUSIONS OF LAW

1. The Washington Utilities and Transportation Commission has jurisdiction over the subject matter of and the parties to this proceeding.

2. The petition in Docket No. UT-930074 for approval of early adoption of SFAS 106 for ratemaking purposes effective January 1, 1992, should be denied as not in the public interest.

3. The petition in Docket No. UT-930307 for inclusion in ratebase of a pension asset should be denied. This addition to ratebase should properly be proposed in a total working capital calculation, which was not presented in this case.

4. The petition in Docket No. UT-931378 for approval of adoption of SFAS 112 for ratemaking purposes effective January 1, 1993, should be modified to request an effective date of January 1, 1994, and, as modified, should be granted.

On the basis of the foregoing findings of fact and conclusions of law, the undersigned Administrative Law Judge enters the following initial order.

ORDER

WHEREFORE, IT IS HEREBY ORDERED That, the petitions by U S WEST in Docket Nos. UT-930074 and UT-930307 for adoption of SFAS 106 effective January 1, 1992, and for inclusion of the pension asset in ratebase are denied. The petition for adoption of SFAS 112, as described and limited in the text of this order, is granted, with the modification that the effective date should be January 1, 1994, not January 1, 1993, as originally requested.

DATED at Olympia, Washington and effective this 16th day of August, 1994.

OFFICE OF ADMINISTRATIVE HEARINGS

LISA A. ANDERL
Administrative Law Judge

NOTICE TO PARTIES:

This is an initial order only. The action proposed in this order is not effective until a final order of the Utilities and Transportation Commission is entered. If you disagree with this initial order and want the Commission to consider your comments, you must take specific action within a time limit as outlined below.

Any party to this proceeding has twenty (20) days after the service date of this initial order to file a Petition for Administrative Review, under WAC 480-09-780(2). Requirements of a Petition are contained in WAC 480-09-780(3). As provided in

WAC 480-09-780(4), any party may file an Answer to a Petition for Administrative Review within ten (10) days after service of the Petition. A Petition for Reopening may be filed by any party after the close of the record and before entry of a final order, under WAC 480-09-820(2). One copy of any Petition or Answer must be served on each party of record and each party's attorney or other authorized representative, with proof of service as required by WAC 480-09-120(2).

In accordance with WAC 480-09-100, all documents to be filed must be addressed to: Office of the Secretary, Washington Utilities and Transportation Commission, 1300 South Evergreen Park Drive S.W., PO Box 47250, Olympia, Washington, 98504-7250. After reviewing the Petitions for Administrative Review, Answers, briefs, and oral arguments, if any, the Commission will by final order affirm, reverse, or modify this initial order.

Legal

Arizona Corporation Commission
DOCKETED

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

JAN 4 1995

LEGAL DIV.
ARIZ. CORPORATION COMMISSION

JAN - 3 1995

DOCKETED BY

MARCIA WEEKS
CHAIRMAN
RENZ D. JENNINGS
COMMISSIONER
DALE H. MORGAN
COMMISSIONER

IN THE MATTER OF THE APPLICATION OF U S WEST COMMUNICATIONS, INC., A COLORADO CORPORATION, FOR A HEARING TO DETERMINE THE EARNINGS OF THE COMPANY, THE FAIR VALUE OF THE COMPANY FOR RATEMAKING PURPOSES, TO FIX A JUST AND REASONABLE RATE OF RETURN THEREON AND TO APPROVE RATE SCHEDULES DESIGNED TO DEVELOP SUCH RETURN.

DOCKET NO. E-1051-93-183

DECISION NO. 58927

OPINION AND ORDER

DATES OF HEARING: May 5, 6, 9, 10, 11, 12, 16, 17, 18, 19, 20, 31 and June 1, 2, 3, 6, 7, 8, and 9, 1994

PUBLIC COMMENTS: April 14, 19, 20, 21, 28, and May 4, 1994

PLACE OF HEARING: Phoenix, Arizona

PRESIDING OFFICER: Jerry L. Rudibaugh

IN ATTENDANCE: Marcia Weeks, Chairman
Renz D. Jennings, Commissioner
Dale H. Morgan, Commissioner

APPEARANCES: Mr. Gary L. Lane, Corporate Counsel - Arizona; Mr. Doug Hickey, Associate General Counsel; Mr. Dave Seykora, Corporate Counsel; and Mr. William M. Ojile, Senior Attorney, on behalf of U S West Communications, Inc.;

Mr. Justin Reidhead, Chief Counsel, on behalf of the Residential Utility Consumer Office;

Mr. T. Larry Barnes, General Attorney, on behalf of AT&T Communications of the Mountain States, Inc.;

O'CONNOR, CAVANAGH, ANDERSON, WESTOVER, KILLINGSWORTH & BESHEARS, by Mr. Raymond S. Heyman, on behalf of Arizona Payphone Association and Communications Vending Corporation of Arizona;

recommendation was for an increase of $6.8 million or .8 percent[2]. RUCO's final recommendation was for an increase of $5 million or .6 percent.[3]

II. ORIGINAL COST RATE BASE

The Company proposed an adjusted original cost rate base ("OCRB") of $1,336,571,000. Staff made several adjustments totaling $48,838,000 resulting in a recommended OCRB of $1,273,461,000[4]. RUCO made similar adjustments totaling $31,205,000 resulting in a recommended OCRB of $1,305,365,000.

A. Pension Asset

In December 1985, the Financial Accounting Standard Board ("FASB") issued its Statement of Financial Accounting Standard No. 87 ("FAS No. 87") concerning employers' accounting for pension costs. The Company adopted FAS No. 87 in 1987. Since that time, the Company's pension plan has been overfunded and at the end of the TY was overfunded by a net amount of $36,213,000. As a result, the Company did not need to contribute additional funds during the TY and did not request any pension expenses as part of this rate case. However, the Company did include the net amount of overfunded pension assets in rate base and requested it be allowed to earn a return on those assets. According to the Company, its shareholders have invested the cumulative amount by which funding has historically exceeded the recorded pension expense.

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[2] Staff's initial recommendation was for an increase of $216,000 or .03 percent.

[3] RUCO's initial recommendation was for a decrease of $4.7 million or a negative .6 percent.

[4] Staff's adjustments were based on the Company's original filed schedules which reflected an OCRB of $1,322,299,000.

Both RUCO and Staff removed the overfunded pension assets from rate base. Staff disagreed with the Company's assertion that shareholders provided the monies which has resulted in the overfunding of the pension plan. Based on information provided by the Company, Staff determined that subsequent to the adoption of FAS No. 87 by the Company, pension expenses have been negative primarily due to the "stellar" returns that have been earned by the pension funds investment. In fact, for the period 1986 through 1993, Staff calculated that the Company actually collected approximately $1.4 million more in pension charges through its cost of service ("COS") than was actually funded in the pension plan.

In response, the Company indicated that funding exceeded the COS by $65.2 million for the period 1976 through 1993. Although the pension plan was started much earlier than 1976, the Company utilized the period for which it had records available. Since the $65.2 million amount exceeds the amount requested in rate base, the Company concluded its request was more than justified.

Staff also performed an analysis of the 1976-1993 period and determined that the Company's claim of excess funding of $65.2 million may be overstated by as much as $96.3 million. First, the amount calculated to be collected through COS depends upon the assumptions made regarding negotiated settlements. Assuming the pension amounts collected through COS did not change as a result of a settlement, Staff determined the Company's COS calculation could be understated by as much as $64.4 million. In addition, Staff indicated that the Company has included both expense and capital components of pension cost funding which are then compared to only expenses in the COS amount. In order to correct this alleged mismatch, Staff determined

the Company's funding amount would need to be reduced by the capital component portion or $31.9 million.

We concur with the Company that the overfunded pension assets which were contributed by shareholders should be included in rate base. It would be unfair to permit ratepayers to benefit by reduced expenses resulting from capital invested by Company shareholders. However, at the same time it would be equally unfair to include the overfunded pension assets in rate base if ratepayers have previously provided those funds to the Company. Although the Company has presented evidence in an effort to demonstrate that since 1986 the shareholders have provided the monies which resulted in the current overfunded pension asset, Staff's analysis has raised significant questions as to the accuracy of the Company's claim. Even if we were convinced of the accuracy of the Company's number for the 1976-1993 period, we would still not be able to conclude that shareholders have advanced excess pension amounts from the inception of the pension account. Based on all the above, we find the Company has not presented sufficient evidence to clearly demonstrate that its shareholders have advanced the excess pension amounts. Accordingly, we must deny the Company's request to include the net amount of overfunding of $36,213,000 in rate base.

B. Short-Term Telephone Plant Under Construction

The Company included $29,282,000 of short-term plant under construction ("STPUC") in its original application. The Company included the STPUC since it was expected to be in service before new rates were approved in this case.

Staff recommended removal of STPUC because of the inherent mismatch that would result from its inclusion. According to Staff,

Arizona Corporation Commission
DOCKETED
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BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED
JAN 4 1995
LEGAL DIV.
ARIZ. CORPORATION COMMISSION

MARCIA WEEKS
CHAIRMAN
RENZ D. JENNINGS
COMMISSIONER
DALE H. MORGAN
COMMISSIONER

IN THE MATTER OF THE APPLICATION OF U S WEST COMMUNICATIONS, INC., A COLORADO CORPORATION, FOR A HEARING TO DETERMINE THE EARNINGS OF THE COMPANY, THE FAIR VALUE OF THE COMPANY FOR RATEMAKING PURPOSES, TO FIX A JUST AND REASONABLE RATE OF RETURN THEREON AND TO APPROVE RATE SCHEDULES DESIGNED TO DEVELOP SUCH RETURN.

DOCKET NO. E-1051-93-183

DECISION NO. 58927

OPINION AND ORDER

DATES OF HEARING: May 5, 6, 9, 10, 11, 12, 16, 17, 18, 19, 20, 31 and June 1, 2, 3, 6, 7, 8, and 9, 1994

PUBLIC COMMENTS: April 14, 19, 20, 21, 28, and May 4, 1994

PLACE OF HEARING: Phoenix, Arizona

PRESIDING OFFICER: Jerry L. Rudibaugh

IN ATTENDANCE: Marcia Weeks, Chairman
Renz D. Jennings, Commissioner
Dale H. Morgan, Commissioner

APPEARANCES: Mr. Gary L. Lane, Corporate Counsel - Arizona; Mr. Doug Hickey, Associate General Counsel; Mr. Dave Seykora, Corporate Counsel; and Mr. William M. Ojile, Senior Attorney, on behalf of U S West Communications, Inc.;

Mr. Justin Reidhead, Chief Counsel, on behalf of the Residential Utility Consumer Office;

Mr. T. Larry Barnes, General Attorney, on behalf of AT&T Communications of the Mountain States, Inc.;

O'CONNOR, CAVANAGH, ANDERSON, WESTOVER, KILLINGSWORTH & BESHEARS, by Mr. Raymond S. Heyman, on behalf of Arizona Payphone Association and Communications Vending Corporation of Arizona;

recommendation was for an increase of $6.8 million or .8 percent[2]. RUCO's final recommendation was for an increase of $5 million or .6 percent.[3]

II. ORIGINAL COST RATE BASE

The Company proposed an adjusted original cost rate base ("OCRB") of $1,336,571,000. Staff made several adjustments totaling $48,838,000 resulting in a recommended OCRB of $1,273,461,000[4]. RUCO made similar adjustments totaling $31,205,000 resulting in a recommended OCRB of $1,305,365,000.

A. Pension Asset

In December 1985, the Financial Accounting Standard Board ("FASB") issued its Statement of Financial Accounting Standard No. 87 ("FAS No. 87") concerning employers' accounting for pension costs. The Company adopted FAS No. 87 in 1987. Since that time, the Company's pension plan has been overfunded and at the end of the TY was overfunded by a net amount of $36,213,000. As a result, the Company did not need to contribute additional funds during the TY and did not request any pension expenses as part of this rate case. However, the Company did include the net amount of overfunded pension assets in rate base and requested it be allowed to earn a return on those assets. According to the Company, its shareholders have invested the cumulative amount by which funding has historically exceeded the recorded pension expense.

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[2] Staff's initial recommendation was for an increase of $216,000 or .03 percent.

[3] RUCO's initial recommendation was for a decrease of $4.7 million or a negative .6 percent.

[4] Staff's adjustments were based on the Company's original filed schedules which reflected an OCRB of $1,322,299,000.

Both RUCO and Staff removed the overfunded pension assets from rate base. Staff disagreed with the Company's assertion that shareholders provided the monies which has resulted in the overfunding of the pension plan. Based on information provided by the Company, Staff determined that subsequent to the adoption of FAS No. 87 by the Company, pension expenses have been negative primarily due to the "stellar" returns that have been earned by the pension funds investment. In fact, for the period 1986 through 1993, Staff calculated that the Company actually collected approximately $1.4 million more in pension charges through its cost of service ("COS") than was actually funded in the pension plan.

In response, the Company indicated that funding exceeded the COS by $65.2 million for the period 1976 through 1993. Although the pension plan was started much earlier than 1976, the Company utilized the period for which it had records available. Since the $65.2 million amount exceeds the amount requested in rate base, the Company concluded its request was more than justified.

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the Company's funding amount would need to be reduced by the capital component portion or $31.9 million.

We concur with the Company that the overfunded pension assets which were contributed by shareholders should be included in rate base. It would be unfair to permit ratepayers to benefit by reduced expenses resulting from capital invested by Company shareholders. However, at the same time it would be equally unfair to include the overfunded pension assets in rate base if ratepayers have previously provided those funds to the Company. Although the Company has presented evidence in an effort to demonstrate that since 1986 the shareholders have provided the monies which resulted in the current overfunded pension asset, Staff's analysis has raised significant questions as to the accuracy of the Company's claim. Even if we were convinced of the accuracy of the Company's number for the 1976-1993 period, we would still not be able to conclude that shareholders have advanced excess pension amounts from the inception of the pension account. Based on all the above, we find the Company has not presented sufficient evidence to clearly demonstrate that its shareholders have advanced the excess pension amounts. Accordingly, we must deny the Company's request to include the net amount of overfunding of $36,213,000 in rate base.

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The Company included $29,282,000 of short-term plant under construction ("STPUC") in its original application. The Company included the STPUC since it was expected to be in service before new rates were approved in this case.

Staff recommended removal of STPUC because of the inherent mismatch that would result from its inclusion. According to Staff,

In Response to HECO/CA-IR-302:

Input Files – HECO's 2005 Test Year November 2004 Direct Testimony Filing.

Avail

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Avail

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Avail

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Avail

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Avail

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12	27	10	1	1	1	1	0	1	0	1	1	1	1	1	1	1	1	1	1	1	0	1
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12	27	12	1	1	1	1	0	1	0	1	1	1	1	1	1	1	1	1	1	1	0	1
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Avail

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12	29	09	1	1	1	1	0	1	0	1	1	1	1	1	1	1	1	1	1	1	0	1
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												Avail									
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BUYPWR

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BUYPWR

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218	219	01	24	43.57
219	220	01	24	43.57
220	221	01	24	43.57
221	222	01	24	43.57
222	223	01	24	43.57
223	224	01	24	43.57
224	225	01	24	43.57
225	226	01	24	43.57
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239	240	01	24	43.57
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243	244	01	24	43.57
244	245	01	24	44.07
245	246	01	24	44.07
246	247	01	24	44.07
247	248	01	24	44.07
248	249	01	24	44.07
249	250	01	24	44.07
250	251	01	24	44.07
251	252	01	24	44.07
252	253	01	24	44.07

BUYPWR

253	254	01	24	44.07
254	255	01	24	44.07
255	256	01	24	44.07
256	257	01	24	44.07
257	258	01	24	44.07
258	259	01	24	44.07
259	260	01	24	44.07
260	261	01	24	44.07
261	262	01	24	44.07
262	263	01	24	44.07
263	264	01	24	44.07
264	265	01	24	44.07
265	266	01	24	44.07
266	267	01	24	44.07
267	268	01	24	44.07
268	269	01	24	44.07
269	270	01	24	44.07
270	271	01	24	44.07
271	272	01	24	44.07
272	273	01	24	44.07
273	274	01	24	44.07
274	275	01	24	44.57
275	276	01	24	44.57
276	277	01	24	44.57
277	278	01	24	44.57
278	279	01	24	44.57
279	280	01	24	44.57
280	281	01	24	44.57
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286	287	01	24	44.57
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292	293	01	24	44.57
293	294	01	24	44.57
294	295	01	24	44.57
295	296	01	24	44.57
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300	301	01	24	44.57
301	302	01	24	44.57
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308	309	01	24	27.59
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310	311	01	24	45.99
311	312	01	24	45.99
312	313	01	24	45.99
313	314	01	24	45.99
314	315	01	24	45.99
315	316	01	24	45.99

BUYPWR

316	317	01	24	45.99
317	318	01	24	45.99
318	319	01	24	45.99
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321	322	01	24	45.99
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323	324	01	24	45.99
324	325	01	24	45.99
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333	334	01	24	45.99
334	335	01	24	45.99
335	336	01	24	47.00
336	337	01	24	28.60
337	338	01	24	28.60
338	339	01	24	28.60
339	340	01	24	28.60
340	341	01	24	28.60
341	342	01	24	28.60
342	343	01	24	28.60
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344	345	01	24	47.00
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357	358	01	24	47.00
358	359	01	24	47.00
359	360	01	24	47.00
360	361	01	24	47.00
361	362	01	24	47.00
362	363	01	24	47.00
363	364	01	24	47.00
364	365	01	24	47.00
365	366	01	24	47.00

COMMIT

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1	5	1	5	12	4	4
1	6	1	6	12	5	5
1	7	1	7	12	4	4
1	8	1	8	12	3	3
1	9	1	11	12	4	4
1	12	1	12	12	5	5
1	13	1	14	12	4	4
1	15	1	15	12	3	3
1	16	1	17	12	5	5
1	18	1	21	12	4	4
1	22	1	22	12	3	3
1	23	1	28	12	4	4
1	29	1	29	12	3	3
1	30	1	31	12	4	4
2	1	2	2	12	5	5
2	3	2	3	12	4	4
2	4	2	4	12	6	6
2	5	2	5	12	4	4
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2	11	2	12	12	4	4
2	13	2	17	12	5	5
2	18	2	20	12	4	4
2	21	2	24	12	5	5
2	25	2	25	12	4	4
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2	27	2	28	12	7	7
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3	4	3	4	12	4	4
3	5	3	5	12	3	3
3	6	3	10	12	4	4
3	11	3	12	12	3	3
3	13	3	15	12	4	4
3	16	3	17	12	8	8
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3	26	3	26	12	4	4
3	27	3	29	12	5	5
3	30	3	30	12	6	6
3	31	3	31	12	5	5
4	1	4	2	12	4	4
4	3	4	3	12	7	7
4	4	4	7	12	5	5
4	8	4	9	12	4	4
4	10	4	11	12	5	5
4	12	4	13	12	6	6
4	14	4	14	12	5	5
4	15	4	17	12	4	4
4	18	4	21	12	5	5
4	22	4	22	12	4	4
4	23	4	23	12	3	3
4	24	4	28	12	4	4
4	29	4	30	12	3	3
5	1	5	2	12	4	4
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5	5	5	5	12	3	3
5	6	5	7	12	3	3
5	8	5	9	12	4	4
5	10	5	11	12	7	7
5	12	5	12	12	4	4

COMMIT

5	13	5	14	12	3	3
5	15	5	15	12	4	4
5	16	5	16	12	5	5
5	17	5	19	12	4	4
5	20	5	20	12	3	3
5	21	5	21	12	2	2
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5	31	5	31	12	3	3
6	1	6	2	12	5	5
6	3	6	4	12	2	2
6	5	6	6	12	5	5
6	7	6	9	12	4	4
6	10	6	12	12	2	2
6	13	6	13	12	4	4
6	14	6	14	12	7	7
6	15	6	16	12	4	4
6	17	6	17	12	2	2
6	18	6	18	12	3	3
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6	23	6	23	12	6	6
6	24	6	25	12	3	3
6	26	6	28	12	5	5
6	29	6	30	12	6	6
7	1	7	2	12	3	3
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7	11	7	14	12	5	5
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7	16	7	16	12	2	2
7	17	7	17	12	7	7
7	18	7	18	12	4	4
7	19	7	19	12	5	5
7	20	7	21	12	4	4
7	22	7	23	12	2	2
7	24	7	25	12	4	4
7	26	7	26	12	5	5
7	27	7	28	12	4	4
7	29	7	30	12	2	2
7	31	7	31	12	4	4
8	1	8	2	12	5	5
8	3	8	4	12	4	4
8	5	8	6	12	2	2
8	7	8	11	12	4	4
8	12	8	13	12	2	2
8	14	8	14	12	6	6
8	15	8	18	12	4	4
8	19	8	21	12	2	2
8	22	8	22	12	4	4
8	23	8	24	12	7	7
8	25	8	25	12	4	4
8	26	8	27	12	2	2
8	28	8	31	12	4	4
9	1	9	1	12	4	4
9	2	9	2	12	3	3
9	3	9	4	12	4	4
9	5	9	8	12	6	6
9	9	9	9	12	4	4

COMMIT

9	10	9	10	12	5	5
9	11	9	13	12	7	7
9	14	9	15	12	4	4
9	16	9	16	12	3	3
9	17	9	17	12	4	4
9	18	9	19	12	6	6
9	20	9	21	12	7	7
9	22	9	22	12	6	6
9	23	9	24	12	4	4
9	25	9	26	12	6	6
9	27	9	27	12	7	7
9	28	9	29	12	6	6
9	30	9	30	12	4	4
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10	2	10	6	12	7	7
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10	10	10	13	12	7	7
10	14	10	15	12	5	5
10	16	10	20	12	7	7
10	21	10	21	12	5	5
10	22	10	22	12	4	4
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10	25	10	26	12	7	7
10	27	10	27	12	5	5
10	28	10	29	12	5	5
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11	27	11	28	12	4	4
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11	30	11	30	12	4	4
12	1	12	2	12	3	3
12	3	12	3	12	2	2
12	4	12	9	12	3	3
12	10	12	10	12	2	2
12	11	12	11	12	3	3
12	12	12	12	12	6	6
12	13	12	14	12	7	7
12	15	12	16	12	3	3
12	17	12	17	12	2	2
12	18	12	19	12	3	3
12	20	12	21	12	4	4
12	22	12	22	12	3	3
12	23	12	23	12	3	3
12	24	12	24	12	3	3
12	25	12	25	12	2	2

COMMIT

12	26	12	27	12	3	3
12	28	12	28	12	6	6
12	29	12	29	12	7	7
12	30	12	30	12	3	3
12	31	12	31	12	2	2

						FUEL
K	BBLS	34.7256	6.2000	LSO	1.026 PF	(1/1.024 = 0.977 AS SHOWN)
W	BBLS	34.7256	6.2000	LSO	1.012 PF	
V	BBLS	34.7256	6.2000	LSO	1.012 PF	
H	BBLS	38.4760	6.2000	LSO	0.997 PF	
D	BBLS	56.7998	5.8600	DIESEL	1.012 PF	
B	BBLS	36.3240	6.0000	KAL	1.029 PF	
A	BBLS	1.4885	1.0000	AES	1.029 PF	(TYPE A FOR FIRST SIX MONTHS)
S	BBLS	34.7256	6.2000	LSO	1.012 PF	(SAME AS W, EXCEPT BASE LOAD)
a	BBLS	1.4885	1.0000	AES	1.029 PF	(TYPE A FOR LAST SIX MONTHS)

LOAD

```
   1096     1108     1065     1056     1046     1119     1117     1154     1150     1149
1159     1171     1995
11.0000 19.0000 11.0000 20.0000 JAN
 0.5241  0.4884  0.4553  0.4456  0.4456  0.5038  0.5470  0.5987  0.7608  0.8202
0.8353  0.8298
 0.8158  0.7905  0.7907  0.7969  0.8362  0.8844  0.9641  0.9548  0.8639  0.8013
0.7088  0.5914
 0.5168  0.4763  0.4610  0.4605  0.4810  0.6276  0.7452  0.8483  0.8918  0.9324
0.9334  0.9220
 0.9251  0.9222  0.9246  0.9270  0.9391  0.9355  0.9852  1.0000  0.9229  0.8299
0.7185  0.5950
13.0000 20.0000 15.0000 20.0000 FEB
 0.5354  0.5039  0.4761    0.47  0.4581  0.5029  0.5412  0.6238  0.7434  0.8027
0.8212  0.8186
 0.8223  0.8146  0.8128  0.8184  0.8535  0.8708  0.8692  0.8758  0.8296  0.7598
0.6744  0.5809
 0.5200  0.4815  0.4685  0.4656  0.4893  0.6104  0.7658  0.8517  0.8907  0.9400
0.9395  0.9304
 0.9228  0.9301  0.9436  0.9407  0.9610  0.9441  0.9841  1.0000  0.9286  0.8394
0.7175  0.6006
10.0000 20.0000 12.0000 20.0000 MAR
 0.5560  0.5243  0.4911  0.4825  0.4819  0.5149  0.5586  0.6659  0.7920  0.8535
0.8497  0.8480
 0.8392  0.8170  0.8235  0.8344  0.8857  0.8839  0.9070  0.9144  0.8813  0.8210
0.7455  0.6131
 0.5241  0.4885  0.4735  0.4707  0.5021  0.5940  0.7885  0.8600  0.9441  0.9642
0.9629  0.9705
 0.9649  0.9659  0.9612  0.9580  0.9836   0.981  0.9950  1.0000  0.9474  0.8556
0.7335  0.6120
12.0000 20.0000 13.0000 17.0000 APR
 0.6003  0.5386  0.4961  0.4859  0.4991  0.5407  0.5770  0.7424  0.8686  0.8885
0.8894  0.8903
 0.8806  0.8724  0.8778  0.8825  0.9025  0.9017  0.9033  0.9054  0.8982  0.8691
0.8347  0.6705
 0.5342  0.4979  0.4856  0.4787  0.5064  0.6530  0.8698  0.9310  0.9796  0.9876
0.9901  0.9884
 0.9911  0.9906  0.9890  0.9893  1.0000  0.9941  0.9941  0.9974  0.9839  0.9294
0.8087  0.6448
15.0000 22.0000 11.0000 17.0000 MAY
 0.6446  0.5805  0.5351  0.5060  0.5075  0.5448  0.5920  0.7161  0.8508  0.8588
0.8582  0.8591
 0.8591  0.8589  0.8590  0.8589  0.8578  0.8568  0.8580  0.8557  0.8574  0.8587
0.8453  0.7143
 0.6071  0.5481  0.5211  0.5030  0.5432  0.6345  0.8367  0.9556  0.9894  0.9995
1.0000  0.9993
 0.9997  0.9995  0.9998  0.9988  0.9989  0.9964  0.9928  0.9958  0.9888  0.9587
0.8596  0.7165
11.0000 20.0000 11.0000 17.0000 JUN
 0.6019  0.5583  0.5267  0.5060  0.5071  0.5335  0.5662  0.6492  0.7628  0.8319
0.8393  0.8238
 0.8252  0.8126  0.8161  0.8124  0.8430  0.8494  0.8408  0.8557  0.8457  0.8078
0.7449  0.6480
 0.5816  0.5375  0.5169  0.5030  0.5338  0.6016  0.7434  0.8564   0.943  0.9955
1.0000  0.9937
 0.9971  0.9949  0.9978  0.9888  0.9898  0.9738  0.9563  0.9704  0.9409  0.8626
0.7588  0.6603
11.0000 20.0000 11.0000 17.0000 JUL
 0.6180  0.5667  0.5299  0.5060  0.5072  0.5378  0.5759  0.6743  0.7959  0.8420
0.8464  0.8370
 0.8379  0.8301  0.8322  0.8299  0.8486  0.8522  0.8473  0.8557  0.8501  0.8269
0.7826  0.6729
 0.5991  0.5415  0.5185  0.5030  0.5373  0.6140  0.7785  0.8937  0.9605  0.9970
1.0000  0.9958
```

LOAD

0.9981 0.9966 0.9986 0.9926 0.9932 0.9823 0.9700 0.9800 0.9589 0.8988
0.7967 0.6814
11.0000 20.0000 11.0000 17.0000 AUG
0.6064 0.5607 0.5276 0.506 0.5071 0.5347 0.5689 0.6562 0.7720 0.8347
0.8413 0.8275
0.8270 0.8175 0.8206 0.8172 0.8446 0.8502 0.8426 0.8557 0.8469 0.8131
0.7554 0.6549
0.5842 0.5386 0.5174 0.5030 0.5348 0.6051 0.7532 0.8667 0.9479 0.9959
1.0000 0.9943
0.9974 0.9954 0.9980 0.9899 0.9907 0.9761 0.9601 0.9731 0.9459 0.8727
0.7693 0.6662
11.0000 19.0000 12.0000 17.0000 SEP
0.5912 0.5600 0.5368 0.5263 0.5233 0.5475 0.5689 0.6466 0.7614 0.8461
0.8499 0.8439
0.8272 0.8127 0.8088 0.8261 0.8628 0.8663 0.8873 0.8824 0.8398 0.7810
0.7061 0.6254
0.5529 0.5241 0.5063 0.4988 0.5228 0.6070 0.7201 0.8242 0.9453 0.9848
0.9935 1.0000
0.9927 0.9997 0.9921 0.9926 0.9985 0.9655 0.9725 0.9858 0.9129 0.8117
0.6956 0.6107
12.0000 18.0000 10.0000 19.0000 OCT
0.5852 0.5411 0.5193 0.5075 0.5046 0.5287 0.5716 0.6513 0.7730 0.8341
0.8476 0.8535
0.8228 0.8189 0.8268 0.8333 0.8676 0.9068 0.9035 0.8862 0.8460 0.7857
0.7015 0.6209
0.5518 0.5139 0.4986 0.4972 0.5142 0.5930 0.7399 0.8439 0.9346 0.9802
0.9703 0.9724
0.9754 0.9753 0.9782 0.9824 0.9951 0.9758 1.0000 0.9726 0.9106 0.8235
0.7044 0.6082
11.0000 19.0000 11.0000 19.0000 NOV
0.5592 0.5228 0.4931 0.4795 0.4852 0.5068 0.5528 0.6294 0.7362 0.8251
0.8325 0.8300
0.8245 0.7966 0.7948 0.8078 0.8369 0.8801 0.9192 0.8743 0.8043 0.7504
0.6727 0.5920
0.5157 0.4821 0.4668 0.4658 0.4846 0.5655 0.7238 0.8109 0.8943 0.9349
0.9459 0.9415
0.9389 0.9386 0.9386 0.9446 0.9532 0.9618 1.0000 0.9461 0.8702 0.7762
0.6764 0.5810
11.0000 19.0000 11.0000 19.0000 DEC
0.5318 0.4940 0.4680 0.4579 0.4593 0.4927 0.5277 0.5851 0.7041 0.7910
0.8081 0.7892
0.7784 0.7545 0.7532 0.7668 0.8004 0.8387 0.9190 0.8756 0.8119 0.7543
0.6675 0.5926
0.5147 0.4729 0.4549 0.4513 0.4739 0.5665 0.6845 0.7860 0.8577 0.8968
0.9047 0.8917
0.8934 0.8953 0.8963 0.8870 0.9024 0.9189 1.0000 0.9428 0.8588 0.7725
0.6727 0.5815
▯

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B2 B B 33  90   00.00   00.00  -1  299.026  4.3444 .009308   8760  0.01
B2  69  74  96  58 192   0
B1 B B 33  90   00.00   00.00  -1  299.026  4.3444 .009308   8760  0.01
B1  69  16  96   0  97   0
B3 B B 01  29   00.00   00.00  -1    0.010  8.7341 .000001   8760  0.01
B3  69  74  96  58 192   0
A2 A A 63 180   00.00   00.00  -1  258.748 14.9713 .0051019  8760  0.01
A2  67   0 130   0 192   0
A1 A A 63  90   00.00   00.00  -1  258.748 14.9713 .0051019  8760  0.01
A1  67   0  80   0  96   0
K5 K K 50 135  4586.0 4586.00  -1  119.921  8.32430 .0053000  8760  0.0113
K5  60  25  70  25  80  25  90  25 100  24 110  18 120  12 130   6 140   0 142
0
W7 W S 33  88  5044.0 5044.00  -1  61.5747  8.66110 .0089700  8760  0.0119
W7  30  26  35  24  40  22  45  20  50  18  55  16  60  13  70   8  80   2  90
0
K4 K K 28  89  5044.0 5044.00  -1  82.4654  7.94950 .0107100  8760  0.0411
K4  35  25  40  22  45  20  50  17  55  15  60  13  70   9  80   3  86   1  90
0
W8 W S 33  88  5044.0 5044.00  -1 105.5491  6.94340 .0234300  8760  0.0179
W8  35  24  40  22  45  20  50  18  55  16  60  13  70   8  80   2  90   0
K2 K K 28  86  5044.0 5044.00  -1  67.3086  8.36910 .0104400  8760  0.0187
K2  30  31  35  28  40  25  45  22  50  19  55  16  60  13  70   8  80   3  85
1  88   0
K3 K K 28  88  5044.0 5044.00  -1 104.9663  7.17590 .0187000  8760  0.0168
K3  35  25  50  33  45  20  50  17  55  15  60  13  70   9  80   3  86   1  90
0
K1 K K 28  88  5044.0 5044.00  -1  87.8473  7.89980 .0151580  8760  0.018
K1  35  28  40  25  45  22  50  19  55  16  60  13  70   8  80   3  85   1  88
0
K6 K K 40 134  9274.0 9274.00  -1 128.2775  8.03510 .0074400  8760  0.0219
K6  60  17  70  17  80  17  90  17 100  17 110  17 120  12 130   6 140   0 142
0
G1 W D 14  52   11.80   11.80  -1 198.6939  7.84970 .0292200  0000  0.3586
G1   5  40  10  35  15  31  20  27  25  23  30  18  35  13  40  10  52   0  53
0
G2 W D 14  50   11.80   11.80  -1 191.3958  7.27570 .0028510  0000  0.2081
G2   5  40  10  35  15  31  20  27  25  23  30  18  35  13  40  10  50   0
W6 W W 23  56  277.00  277.00  -1  61.2878  8.58660 .0206800  0000  0.033
W6  20  25  25  21  30  18  35  15  40  11  45   8  50   4  55   2  57   1
H9 H H 23  54  190.00  190.00  -1  62.6737  9.40380 .0194700  0000  0.0642
H9  20  28  25  24  30  20  35  17  40  13  45   9  50   5  55   2  57   0
W5 W W 23  55  277.00  277.00  -1  31.2522 10.17760 .0099300  0000  0.0257
W5  20  25  25  21  30  18  35  15  40  11  45   8  50   4  55   2  57   0
H8 H H 22  53  190.00  190.00  -1  56.7792 10.5093  .0080000  0000  0.0752
H8  20  22  25  20  30  17  35  16  40  11  45   8  50   4  54   1  55   0  57
0
W4 W V 22  46  337.00  337.00  -1  49.0463  9.23320 .0317600  0000  0.0616
W4  20  25  25  21  30  16  35  12  40   8  45   4  49   0
W3 W V 22  46  337.00  337.00  -1  69.3131  8.45890 .0450000  0000  0.049
W3  20  25  25  21  30  16  35  12  40   8  45   4  49   0
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ORDER

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02	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	G1	G2	H9	W5	H8	W4	W3
03	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	H9	G1	G2	W5	H8	W4	W3
04	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	H9	W5	G1	G2	H8	W4	W3
05	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	H9	W5	H8	G1	G2	W4	W3
06	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	H9	W5	H8	W4	G1	G2	W3
07	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	H9	W5	H8	W4	W3	G1	G2
08	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	W5	H9	H8	W4	G1	G2	W3
09	B2	A2	B3	B1	A1	K3	K6	K1	W7	K4	W8	K2	K5	H8	H9	W5	W6	G2	G1	W3	W4
10	A2	A1	B3	K6	B2	K5	W8	W7	K3	K4	K2	K1	W6	H9	B1	H8	W5	W4	W3	G1	G2
11	B2	A2	B3	B1	A1	K2	K5	W8	W7	K4	K3	K1	K6	W4	W6	H9	W5	W3	H8	G1	G2
12	B2	A2	B3	B1	A1	K2	K5	W8	W7	K4	K3	K1	K6	W4	W6	H9	G1	G2	W5	W3	H8

SPECIAL

1	2	NEW YEARS DAY
2	20	PRESIDENTS DAY
4	17	EASTER
5	30	MEMORIAL DAY
6	12	KAMEHAMEHA DAY
7	4	INDEPENDENCE DAY
8	21	ADMISSIONS DAY
9	4	LABOR DAY
10	9	COLUMBUS DAY
11	10	VETERANS DAY
11	23	THANKSGIVING
12	25	CHRISTMAS

In Response to HECO/CA-IR-302

Input Files – HECO's 2005 Test Year Including May 2005 Updates (CA Direct Testimony).

avail

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avail

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BUYPWR

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BUYPWR

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254	255	01	24	42.20
255	256	01	24	42.20
256	257	01	24	42.20
257	258	01	24	42.20
258	259	01	24	42.20
259	260	01	24	42.20
260	261	01	24	42.20
261	262	01	24	42.20
262	263	01	24	42.20
263	264	01	24	42.20
264	265	01	24	42.20
265	266	01	24	42.20
266	267	01	24	42.20
267	268	01	24	42.20
268	269	01	24	42.20
269	270	01	24	42.20
270	271	01	24	42.20
271	272	01	24	42.20
272	273	01	24	42.20
273	274	01	24	42.20
274	275	01	24	42.20
275	276	01	24	42.20
276	281	01	10	42.20
276	281	11	15	56.98
276	281	16	24	42.20
281	282	01	24	42.20
282	283	01	24	42.20
283	288	01	10	42.20
283	288	11	15	56.98
283	288	16	24	42.20
288	289	01	24	42.20
289	290	01	24	42.20
290	295	01	10	42.20
290	295	11	15	56.98
290	295	16	24	42.20
295	296	01	24	42.20
296	297	01	24	42.20
297	302	01	10	42.20
297	302	11	15	56.98
297	302	16	24	42.20
302	303	01	24	23.80
303	304	01	24	23.80
304	309	01	10	23.80
304	309	11	15	38.58
304	309	16	24	23.80
309	310	01	24	23.80
310	311	01	24	42.20
311	316	01	10	42.20
311	316	11	15	56.98
311	316	16	24	42.20
316	317	01	24	42.20
317	318	01	24	42.20
318	323	01	10	42.20
318	323	11	15	56.98
318	323	16	24	42.20
323	324	01	24	42.20
324	325	01	10	42.20
325	330	01	10	42.20
325	330	11	15	56.98
325	330	16	24	42.20
330	331	01	24	42.20
331	332	01	24	42.20

BUYPWR

332	337	01	10	23.80
332	337	11	15	38.58
332	337	16	24	23.80
337	338	01	24	23.80
338	339	01	10	23.80
339	344	01	10	23.80
339	344	11	15	38.58
339	344	16	24	23.80
344	345	01	24	42.20
345	346	01	24	42.20
346	351	01	10	42.20
346	351	11	15	56.98
346	351	16	24	42.20
351	352	01	24	42.20
352	353	01	24	42.20
353	358	01	10	42.20
353	358	11	15	56.98
353	358	16	24	42.20
358	359	01	24	42.20
359	360	01	24	42.20
360	365	01	10	42.20
360	365	11	15	56.98
360	365	16	24	42.20

COMMIT

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1	23	1	28	12	4	4
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2	27	2	28	12	7	7
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3	31	3	31	12	5	5
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4	10	4	11	12	5	5
4	12	4	13	12	6	6
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4	23	4	23	12	3	3
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5	10	5	11	12	7	7
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COMMIT

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5	16	5	16	12	5	5
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7	20	7	21	12	4	4
7	22	7	23	12	2	2
7	24	7	25	12	4	4
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7	29	7	30	12	2	2
7	31	7	31	12	4	4
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8	28	8	31	12	4	4
9	1	9	1	12	4	4
9	2	9	2	12	3	3
9	3	9	4	12	4	4
9	5	9	8	12	6	6
9	9	9	9	12	4	4

COMMIT

9	10	9	10	12	5	5
9	11	9	13	12	7	7
9	14	9	15	12	4	4
9	16	9	16	12	3	3
9	17	9	17	12	4	4
9	18	9	19	12	6	6
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12	23	12	23	12	3	3
12	24	12	24	12	3	3
12	25	12	25	12	2	2

COMMIT

12	26	12	27	12	3	3
12	28	12	28	12	6	6
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12	30	12	30	12	3	3
12	31	12	31	12	2	2

						FUEL
K	BBLS	53.7346	6.2000	LSO	1.026 PF	(1/1.024 = 0.977 AS SHOWN)
W	BBLS	53.7346	6.2000	LSO	1.012 PF	
V	BBLS	53.7346	6.2000	LSO	1.012 PF	
H	BBLS	57.4850	6.2000	LSO	0.997 PF	
D	BBLS	79.4392	5.8600	DIESEL	1.012 PF	
B	BBLS	55.3330	6.0000	KAL	1.029 PF	
A	BBLS	2.3033	1.0000	AES	1.029 PF	(TYPE A FOR FIRST SIX MONTHS)
S	BBLS	53.7346	6.2000	LSO	1.012 PF	(SAME AS W, EXCEPT BASE LOAD)
a	BBLS	2.3033	1.0000	AES	1.029 PF	(TYPE A FOR LAST SIX MONTHS)

HourL

1	1	5	758	703	649	625	627	652	680	727
825	912	957	974							
1	1	5	965	958	952	955	970	1016	1071	1027
974	909	814	716							
1	2	5	688	647	621	613	624	652	689	753
845	906	928	939							
1	2	5	926	922	909	919	933	987	1065	1015
952	873	771	679							
1	3	5	628	604	593	600	655	765	877	926
979	1021	1036	1044							
1	3	5	1043	1036	1021	1015	1005	1046	1126	1062
979	880	778	681							
1	4	5	626	598	582	592	645	757	864	910
973	1021	1038	1043							
1	4	5	1043	1042	1034	1031	1029	1078	1149	1084
1001	902	786	684							
1	5	5	630	601	586	593	646	768	880	914
980	1038	1050	1061							
1	5	5	1063	1072	1066	1054	1046	1076	1145	1080
997	899	784	684							
1	6	5	628	598	582	589	641	759	867	908
975	1021	1054	1055							
1	6	5	1062	1059	1058	1054	1041	1071	1145	1078
996	895	780	677							
1	7	5	625	593	581	587	636	757	876	917
993	1040	1064	1075							
1	7	5	1087	1087	1087	1075	1061	1098	1130	1061
992	908	811	720							
1	8	5	657	623	603	601	620	668	739	821
909	964	980	982							
1	8	5	971	950	926	931	936	985	1043	979
917	849	772	688							
1	9	5	633	598	581	576	592	624	673	741
823	877	901	909							
1	9	5	906	897	892	909	931	985	1070	1016
942	862	749	657							
1	10	5	608	583	575	585	648	778	911	926
987	1029	1053	1070							
1	10	5	1078	1079	1078	1076	1068	1127	1181	1117
1025	931	809	710							
1	11	5	658	633	618	626	687	828	971	991
1040	1080	1110	1116							
1	11	5	1121	1118	1110	1105	1089	1130	1194	1132
1050	943	824	724							
1	12	5	674	643	633	643	695	840	987	1003
1058	1083	1068	1072							
1	12	5	1075	1053	1041	1036	1029	1059	1136	1076
987	884	764	668							
1	13	5	613	583	568	575	631	765	898	909
953	984	994	997							
1	13	5	999	991	984	983	977	1016	1098	1038
958	858	746	651							
1	14	5	595	567	556	564	616	743	872	902
957	996	1009	1012							
1	14	5	1018	1018	1010	1002	996	1013	1078	1020
962	883	796	710							
1	15	5	650	612	595	595	614	664	742	832
918	976	980	983							
1	15	5	965	950	934	945	955	983	1057	999
947	884	804	718							
1	16	5	657	622	603	600	615	650	697	766
851	910	926	941							
1	16	5	936	930	919	933	949	1001	1069	1026

HourL

970	911	821	731							
1	17	5	676	633	613	616	653	725	810	885
969	1034	1050	1040							
1	17	5	1036	1012	992	986	991	1033	1114	1048
966	867	753	658							
1	18	5	605	575	564	575	629	757	894	913
967	1003	1008	1010							
1	18	5	1018	1016	1013	1004	1000	1028	1124	1048
982	869	749	654							
1	19	5	600	574	560	570	626	758	901	916
961	995	1015	1017							
1	19	5	1025	1026	1021	1020	1016	1049	1139	1063
990	908	791	688							
1	20	5	632	604	593	601	664	794	941	965
1026	1070	1094	1103							
1	20	5	1105	1101	1103	1104	1099	1126	1202	1149
1065	958	832	729							
1	21	5	673	644	629	638	698	841	1000	1032
1087	1124	1146	1150							
1	21	5	1149	1138	1126	1126	1133	1145	1135	1058
986	911	809	716							
1	22	5	655	617	598	596	614	661	740	824
922	978	1002	1008							
1	22	5	995	980	968	969	975	1002	1063	1013
952	886	801	713							
1	23	5	649	612	591	587	601	633	686	763
858	930	968	988							
1	23	5	977	943	936	939	949	1021	1106	1072
1005	909	803	703							
1	24	5	645	620	607	618	679	812	965	992
1063	1110	1138	1155							
1	24	5	1164	1162	1155	1145	1131	1163	1227	1156
1063	949	822	714							
1	25	5	654	622	609	615	673	807	943	964
1038	1084	1112	1116							
1	25	5	1118	1104	1100	1096	1084	1119	1212	1135
1069	952	824	724							
1	26	5	663	635	624	633	690	836	990	1010
1053	1079	1090	1105							
1	26	5	1105	1096	1087	1087	1092	1138	1183	1109
1015	931	807	702							
1	27	5	647	619	605	613	672	812	955	969
1023	1064	1073	1072							
1	27	5	1075	1068	1066	1064	1063	1097	1170	1119
1028	931	806	708							
1	28	5	650	621	607	614	671	808	953	973
1033	1072	1082	1092							
1	28	5	1093	1094	1090	1080	1070	1077	1130	1072
1007	931	829	734							
1	29	5	672	637	616	615	637	688	767	866
964	1015	1024	1021							
1	29	5	1010	993	985	990	999	1015	1090	1038
975	910	826	729							
1	30	5	666	632	609	603	619	655	707	782
876	931	951	953							
1	30	5	951	945	941	949	969	1002	1099	1063
993	907	792	692							
1	31	5	639	614	603	608	668	805	936	960
1036	1075	1096	1104							
1	31	5	1109	1110	1107	1099	1084	1101	1197	1142
1044	939	813	711							
2	1	5	642	617	607	614	657	777	920	939
1001	1040	1069	1074							

HourL

2	1	5	1088	1090	1092	1085	1077	1086	1191	1096
1022	895	772	679							
2	2	5	630	605	595	601	645	765	905	923
998	1044	1071	1085							
2	2	5	1097	1098	1096	1093	1077	1092	1186	1121
1038	923	797	700							
2	3	5	648	626	617	624	673	802	960	990
1062	1093	1096	1083							
2	3	5	1060	1047	1050	1062	1047	1074	1153	1075
989	874	756	665							
2	4	5	617	594	586	589	633	749	877	901
952	985	990	991							
2	4	5	995	998	995	992	979	977	1050	987
923	835	746	667							
2	5	5	618	592	580	579	592	630	689	775
865	912	926	926							
2	5	5	912	901	896	908	917	932	1017	966
896	828	751	672							
2	6	5	624	594	580	577	588	613	650	719
806	860	882	887							
2	6	5	882	875	875	890	918	959	1071	1033
951	852	744	660							
2	7	5	615	596	587	595	645	760	896	923
982	1021	1037	1046							
2	7	5	1048	1042	1038	1031	1022	1048	1159	1096
985	883	759	670							
2	8	5	626	602	592	598	646	764	918	933
980	1026	1042	1048							
2	8	5	1042	1039	1039	1029	1025	1070	1155	1082
1010	889	766	677							
2	9	5	631	609	598	605	653	773	921	940
990	1025	1044	1054							
2	9	5	1062	1051	1047	1031	1033	1074	1147	1078
1001	892	768	676							
2	10	5	630	609	598	605	658	781	930	955
1001	1023	1043	1040							
2	10	5	1037	1033	1040	1031	1042	1083	1150	1074
992	887	771	676							
2	11	5	630	602	593	599	643	751	891	917
976	994	1004	994							
2	11	5	987	969	960	969	984	1016	1055	970
922	847	759	679							
2	12	5	630	602	591	592	606	642	706	790
872	928	946	933							
2	12	5	908	889	876	883	898	922	1009	959
891	829	748	673							
2	13	5	625	596	583	580	590	617	652	723
805	854	872	869							
2	13	5	859	851	852	864	890	922	1001	966
903	834	755	676							
2	14	5	629	603	591	592	615	657	708	783
879	947	970	970							
2	14	5	956	944	940	945	971	1031	1112	1058
944	867	754	667							
2	15	5	626	603	594	602	647	765	905	932
994	1033	1047	1050							
2	15	5	1051	1048	1048	1043	1030	1044	1160	1077
1009	883	765	675							
2	16	5	630	606	595	601	644	763	908	932
994	1027	1052	1062							
2	16	5	1060	1069	1064	1064	1060	1062	1176	1083
994	916	785	688							
2	17	5	640	615	605	612	658	781	924	962

HourL

1022	1055	1058	1073							
2	17	5	1077	1077	1079	1079	1067	1079	1182	1121
1033	922	793	694							
2	18	5	648	622	609	614	658	781	918	956
1030	1070	1083	1088							
2	18	5	1092	1092	1092	1083	1067	1067	1129	1071
1003	911	810	719							
2	19	5	666	636	619	616	633	673	747	848
947	1000	1023	1026							
2	19	5	1009	991	984	990	998	1014	1094	1046
977	901	812	723							
2	20	5	668	635	619	614	623	652	684	768
860	918	941	947							
2	20	5	946	944	945	961	989	1025	1122	1086
1005	915	796	703							
2	21	5	652	628	618	626	675	804	947	992
1060	1108	1119	1119							
2	21	5	1115	1108	1105	1097	1083	1083	1191	1139
1038	920	791	694							
2	22	5	646	619	609	615	667	790	935	969
1021	1077	1092	1105							
2	22	5	1114	1118	1111	1105	1094	1105	1201	1135
1054	926	797	703							
2	23	5	651	628	621	626	672	796	938	974
1031	1078	1101	1107							
2	23	5	1111	1111	1107	1100	1089	1100	1183	1129
1048	933	796	700							
2	24	5	651	624	613	621	668	794	932	971
1043	1090	1111	1111							
2	24	5	1119	1119	1119	1108	1098	1094	1179	1128
1046	929	799	703							
2	25	5	653	626	615	621	671	793	941	981
1031	1075	1089	1096							
2	25	5	1098	1088	1085	1077	1063	1050	1118	1066
990	912	809	720							
2	26	5	664	635	617	616	633	673	743	848
944	992	1007	1007							
2	26	5	990	972	962	965	974	984	1055	1021
957	882	793	710							
2	27	5	658	627	611	608	617	648	687	766
851	909	924	926							
2	27	5	921	915	911	928	950	979	1082	1062
986	887	769	681							
2	28	5	632	608	598	602	652	768	894	940
1017	1047	1073	1085							
2	28	5	1092	1089	1090	1089	1077	1079	1173	1123
1035	904	781	685							
3	1	5	629	609	600	604	642	742	864	901
966	1003	1020	1023							
3	1	5	1035	1038	1045	1045	1032	1038	1138	1080
990	875	754	673							
3	2	5	635	616	607	610	647	749	867	909
975	1025	1056	1065							
3	2	5	1074	1075	1078	1071	1060	1067	1148	1088
1011	888	759	675							
3	3	5	635	613	604	609	657	771	896	945
1016	1081	1106	1101							
3	3	5	1108	1106	1108	1108	1094	1108	1180	1128
1013	898	772	686							
3	4	5	644	625	615	618	657	760	885	945
1023	1085	1097	1110							
3	4	5	1122	1119	1110	1095	1080	1082	1123	1060
986	898	794	712							

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3	5	5	663	637	623	619	633	668	727	825
912	975	987	982							
3	5	5	969	950	942	954	966	986	1031	992
919	857	773	696							
3	6	5	650	626	614	612	621	647	682	753
839	889	906	907							
3	6	5	914	911	906	926	947	979	1087	1071
988	885	767	681							
3	7	5	637	616	607	611	647	752	874	932
1023	1070	1094	1113							
3	7	5	1125	1123	1120	1114	1097	1103	1199	1156
1057	924	792	698							
3	8	5	652	631	621	624	664	769	899	965
1042	1091	1114	1123							
3	8	5	1133	1132	1135	1136	1110	1111	1201	1154
1046	919	785	693							
3	9	5	649	625	616	619	656	764	887	946
1035	1082	1108	1120							
3	9	5	1135	1151	1150	1135	1125	1132	1202	1147
1060	920	786	689							
3	10	5	647	624	614	615	651	754	880	930
1020	1073	1100	1117							
3	10	5	1138	1145	1159	1151	1132	1122	1210	1177
1063	939	798	705							
3	11	5	658	633	621	622	659	760	882	956
1038	1087	1106	1123							
3	11	5	1133	1136	1130	1130	1104	1078	1130	1095
1008	905	793	709							
3	12	5	658	631	617	614	625	660	717	824
923	980	1001	1001							
3	12	5	990	964	955	962	973	986	1047	1005
945	867	786	706							
3	13	5	657	634	619	614	624	649	686	762
851	909	926	929							
3	13	5	921	911	908	924	956	987	1052	1039
968	875	765	685							
3	14	5	644	624	616	622	662	763	882	974
1068	1128	1161	1165							
3	14	5	1173	1171	1168	1151	1132	1142	1199	1153
1038	915	788	702							
3	15	5	657	636	625	629	666	772	884	975
1047	1098	1119	1125							
3	15	5	1132	1130	1122	1108	1085	1084	1153	1103
1013	912	785	694							
3	16	5	652	628	620	625	662	767	863	946
1004	1049	1061	1074							
3	16	5	1078	1071	1073	1064	1050	1053	1130	1082
1001	893	773	687							
3	17	5	644	625	614	618	655	754	867	936
1000	1058	1074	1077							
3	17	5	1088	1085	1084	1075	1060	1056	1128	1098
1003	896	775	690							
3	18	5	649	628	617	619	657	750	864	942
1016	1065	1092	1095							
3	18	5	1097	1095	1087	1074	1056	1036	1080	1042
964	882	789	712							
3	19	5	661	637	621	620	635	666	726	821
912	965	984	984							
3	19	5	971	956	947	954	956	962	1019	992
914	848	777	703							
3	20	5	654	630	615	612	619	642	676	748
829	889	907	918							
3	20	5	909	906	909	925	942	975	1034	1012

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944	872	777	693							
3	21	5	650	631	619	623	659	741	831	940
1027	1075	1104	1117							
3	21	5	1125	1125	1108	1074	1077	1074	1139	1101
1008	896	782	698							
3	22	5	652	631	622	625	657	740	833	931
999	1063	1088	1098							
3	22	5	1103	1101	1090	1098	1082	1074	1125	1084
1004	889	772	689							
3	23	5	644	623	614	614	643	713	786	884
973	1027	1056	1067							
3	23	5	1073	1068	1064	1068	1064	1073	1141	1092
1020	906	792	702							
3	24	5	659	637	627	631	670	761	875	955
1017	1054	1065	1071							
3	24	5	1065	1049	1038	1032	1040	1063	1087	1034
951	848	744	670							
3	25	5	633	615	607	609	643	722	813	903
986	1034	1056	1057							
3	25	5	1053	1043	1031	1031	1008	995	1034	991
923	839	758	680							
3	26	5	638	616	605	604	614	647	697	800
888	941	973	978							
3	26	5	968	961	947	959	961	964	1025	1004
939	862	783	706							
3	27	5	659	634	619	617	625	646	678	744
832	896	921	923							
3	27	5	923	920	917	934	962	1005	1046	1016
951	857	758	681							
3	28	5	643	629	620	627	670	781	906	980
1064	1122	1142	1157							
3	28	5	1162	1153	1147	1135	1117	1125	1191	1182
1068	934	803	709							
3	29	5	663	642	633	635	673	793	919	983
1060	1107	1144	1156							
3	29	5	1170	1167	1170	1161	1139	1130	1191	1157
1064	920	790	699							
3	30	5	655	635	625	629	669	787	917	988
1063	1106	1122	1136							
3	30	5	1144	1147	1139	1126	1107	1108	1167	1123
1039	907	781	691							
3	31	5	647	629	619	621	660	769	891	956
1045	1095	1107	1123							
3	31	5	1130	1130	1119	1103	1095	1103	1187	1156
1060	926	795	704							
4	1	5	662	644	636	623	655	745	870	948
1008	1059	1087	1110							
4	1	5	1126	1138	1135	1110	1078	1069	1115	1080
988	898	794	709							
4	2	5	666	645	635	632	644	674	733	849
917	984	1023	1026							
4	2	5	1017	994	990	995	1008	1013	1072	1042
966	879	790	715							
4	3	5	671	649	638	635	642	664	695	780
871	934	964	978							
4	3	5	980	978	978	990	1007	1035	1105	1102
1005	893	771	696							
4	4	5	661	645	640	645	682	789	928	1001
1107	1161	1153	1158							
4	4	5	1161	1158	1163	1172	1153	1155	1203	1187
1064	917	785	698							
4	5	5	658	640	633	637	670	779	908	990
1080	1138	1161	1175							

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4	5	5	1182	1175	1191	1173	1158	1143	1182	1172
1078	931	791	705							
4	6	5	664	647	639	643	677	785	924	975
1061	1110	1133	1141							
4	6	5	1145	1141	1143	1118	1097	1094	1148	1135
1049	912	778	697							
4	7	5	660	643	636	640	674	786	920	990
1083	1140	1163	1172							
4	7	5	1182	1182	1180	1167	1146	919	1148	1120
1007	876	761	682							
4	8	5	649	635	629	632	664	771	897	987
1078	1121	1153	1165							
4	8	5	1172	1170	1158	1143	1113	1094	1131	1097
1011	919	809	727							
4	9	5	682	658	646	645	657	695	752	864
949	998	1021	1017							
4	9	5	997	980	970	978	978	988	1032	1020
945	870	784	706							
4	10	5	665	643	632	629	637	658	688	765
843	887	911	915							
4	10	5	912	906	903	912	938	961	1038	1059
977	870	758	683							
4	11	5	649	635	629	634	663	771	897	974
1055	1107	1120	1135							
4	11	5	1141	1130	1120	1102	1081	1075	1153	1145
1026	903	772	692							
4	12	5	653	637	631	635	667	770	892	960
1032	1070	1080	1094							
4	12	5	1099	1094	1081	1065	1049	1052	1116	1102
1014	875	755	678							
4	13	5	646	633	625	630	658	760	872	928
995	1039	1050	1064							
4	13	5	1062	1065	1070	1055	1042	1041	1092	1078
1001	869	758	679							
4	14	5	645	630	623	627	658	761	879	942
1023	1062	1084	1095							
4	14	5	1091	1086	1078	1064	1039	1036	1075	1070
974	864	764	686							
4	15	5	651	636	628	629	652	715	791	896
987	1047	1062	1069							
4	15	5	1053	1033	1011	992	994	997	1010	1008
942	856	766	693							
4	16	5	655	636	626	624	634	665	718	816
892	945	960	960							
4	16	5	945	936	925	931	942	951	987	991
929	854	767	697							
4	17	5	653	635	624	621	631	653	676	741
802	849	862	861							
4	17	5	854	845	844	852	864	869	934	964
916	834	736	664							
4	18	5	637	625	621	625	657	755	863	952
1030	1072	1092	1092							
4	18	5	1094	1087	1089	1065	1053	1046	1120	1103
997	865	749	673							
4	19	5	643	628	623	627	657	758	870	936
1001	1055	1069	1084							
4	19	5	1076	1069	1065	1056	1039	1033	1092	1092
1000	868	746	669							
4	20	5	640	626	621	625	653	752	872	949
1023	1064	1083	1081							
4	20	5	1089	1091	1084	1072	1059	1046	1089	1091
1004	877	756	676							
4	21	5	646	632	625	628	661	763	879	944

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1026	1080	1094	1105							
4	21	5	1110	1107	1107	1100	1083	1072	1120	1130
1032	901	776	694							
4	22	5	657	638	630	634	663	766	887	978
1053	1103	1125	1133							
4	22	5	1140	1133	1125	1116	1080	1049	1055	1058
984	887	783	706							
4	23	5	661	641	630	627	638	668	726	830
924	973	991	987							
4	23	5	974	963	959	964	970	971	997	1017
948	863	774	701							
4	24	5	661	639	630	626	632	649	679	758
843	906	929	933							
4	24	5	933	931	933	944	974	988	1032	1065
980	872	761	682							
4	25	5	647	632	624	629	659	754	877	973
1064	1128	1151	1172							
4	25	5	1182	1184	1184	1161	1138	1128	1168	1173
1055	911	779	692							
4	26	5	652	636	628	632	660	760	880	970
1053	1103	1140	1155							
4	26	5	1167	1158	1160	1146	1126	1105	1131	1135
1042	900	767	684							
4	27	5	649	631	625	628	657	751	871	957
1038	1087	1118	1128							
4	27	5	1141	1156	1155	1148	1140	1121	1155	1158
1070	924	790	701							
4	28	5	662	643	636	638	668	769	897	974
1049	1121	1163	1167							
4	28	5	1180	1170	1170	1158	1133	1120	1161	1170
1073	934	802	709							
4	29	5	663	644	636	639	670	771	908	1016
1073	1126	1158	1168							
4	29	5	1172	1167	1155	1130	1107	1086	1081	1086
990	902	794	710							
4	30	5	667	646	635	635	646	675	742	855
953	1004	1019	1023							
4	30	5	1019	1000	992	1001	1008	1016	1058	1065
990	898	803	722							
5	1	5	681	650	633	627	639	668	716	806
889	938	962	963							
5	1	5	961	952	946	955	973	986	1012	1054
991	905	799	707							
5	2	5	661	636	625	633	680	797	924	1002
1063	1103	1113	1112							
5	2	5	1120	1111	1100	1086	1078	1086	1118	1102
1025	917	803	714							
5	3	5	662	636	626	633	684	812	933	998
1064	1098	1113	1121							
5	3	5	1132	1128	1128	1115	1100	1097	1128	1125
1058	947	821	729							
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1049	1086	1107	1123							
5	4	5	1124	1123	1118	1103	1091	1089	1112	1103
1037	921	806	711							
5	5	5	665	636	625	633	683	803	930	1007
1077	1118	1131	1140							
5	5	5	1150	1148	1142	1134	1118	1100	1114	1129
1050	945	827	731							
5	6	5	684	651	638	645	690	807	930	1000
1069	1107	1119	1124							
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998	921	828	738							

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5	7	5	683	653	636	632	655	694	768	869
949	983	994	994							
5	7	5	983	974	967	976	975	969	989	1007
957	891	818	731							
5	8	5	674	642	625	620	631	655	712	799
879	919	933	928							
5	8	5	928	922	927	936	947	941	959	1004
959	892	789	700							
5	9	5	655	630	619	625	675	784	909	990
1056	1094	1115	1124							
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1042	930	809	716							
5	10	5	667	641	627	634	682	800	923	998
1064	1098	1112	1119							
5	10	5	1130	1126	1121	1109	1094	1072	1096	1106
1042	923	802	709							
5	11	5	662	638	624	630	675	790	914	980
1046	1084	1104	1115							
5	11	5	1121	1121	1124	1114	1089	1076	1090	1101
1047	926	808	716							
5	12	5	669	644	629	637	681	797	920	994
1063	1096	1112	1112							
5	12	5	1119	1115	1115	1100	1086	1069	1071	1096
1031	930	810	719							
5	13	5	669	642	630	635	682	788	915	982
1043	1082	1101	1104							
5	13	5	1108	1113	1106	1098	1076	1053	1042	1059
996	922	827	740							
5	14	5	684	653	633	630	647	682	763	866
951	1000	1014	1013							
5	14	5	1006	999	993	998	1004	994	1006	1022
964	895	810	730							
5	15	5	672	637	620	620	630	653	706	788
868	912	928	934							
5	15	5	933	930	933	942	963	976	1002	1053
984	899	799	710							
5	16	5	659	636	628	635	685	801	924	1004
1067	1107	1128	1139							
5	16	5	1137	1134	1132	1120	1101	1084	1111	1124
1039	935	817	725							
5	17	5	676	651	639	642	692	801	932	1006
1071	1113	1128	1136							
5	17	5	1139	1139	1131	1128	1102	1076	1089	1100
1039	927	808	713							
5	18	5	663	636	625	633	681	793	918	984
1050	1089	1103	1111							
5	18	5	1118	1115	1115	1107	1092	1073	1095	1097
1022	944	818	726							
5	19	5	671	647	634	640	684	797	917	980
1044	1089	1103	1121							
5	19	5	1140	1135	1145	1134	1114	1097	1102	1141
1077	965	846	747							
5	20	5	693	662	648	651	696	806	936	1009
1075	1107	1123	1139							
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1016	942	842	749							
5	21	5	695	662	645	639	652	689	768	869
952	991	1005	1016							
5	21	5	1009	1002	998	1005	1009	1004	1014	1035
983	919	833	754							
5	22	5	693	661	642	636	645	666	718	804
888	941	970	976							
5	22	5	981	984	988	1000	1004	999	984	1018

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972	909	822	740							
5	23	5	685	653	637	635	649	677	738	833
927	990	1016	1023							
5	23	5	1024	1024	1036	1054	1072	1072	1072	1120
1054	954	827	735							
5	24	5	684	656	641	648	692	805	931	1007
1090	1137	1167	1183							
5	24	5	1195	1197	1201	1196	1176	1145	1134	1172
1091	975	843	746							
5	25	5	689	661	644	650	695	805	929	1015
1082	1129	1162	1177							
5	25	5	1192	1198	1185	1182	1157	1136	1130	1162
1089	974	850	752							
5	26	5	671	647	634	640	684	797	917	980
1044	1089	1103	1121							
5	26	5	1140	1135	1145	1134	1114	1097	1102	1141
1077	965	846	747							
5	27	5	701	674	659	662	708	817	947	1022
1097	1140	1158	1172							
5	27	5	1178	1172	1171	1157	1126	1088	1064	1077
1023	941	848	760							
5	28	5	704	670	651	648	661	695	770	881
982	1025	1054	1054							
5	28	5	1051	1039	1031	1039	1042	1028	1029	1060
1007	936	849	765							
5	29	5	706	669	652	644	653	670	727	813
899	955	984	996							
5	29	5	1000	998	1000	1012	1020	1024	1045	1083
1040	954	837	746							
5	30	5	685	653	637	635	649	677	738	833
927	990	1016	1023							
5	30	5	1024	1024	1036	1054	1072	1072	1072	1120
1054	954	827	735							
5	31	5	697	666	650	656	697	803	938	1015
1086	1139	1170	1180							
5	31	5	1192	1198	1192	1175	1155	1141	1140	1167
1101	982	856	755							
6	1	5	711	681	664	668	715	831	957	1049
1101	1129	1162	1170							
6	1	5	1182	1187	1182	1169	1156	1139	1139	1158
1096	985	859	759							
6	2	5	707	676	660	662	709	820	940	1022
1097	1139	1164	1180							
6	2	5	1183	1179	1185	1176	1152	1131	1124	1158
1089	983	867	764							
6	3	5	703	673	657	661	708	796	942	1041
1105	1154	1173	1181							
6	3	5	1194	1187	1185	1179	1155	1119	1102	1130
1060	969	867	767							
6	4	5	709	672	653	645	663	697	789	911
999	1050	1072	1072							
6	4	5	1068	1060	1057	1052	1042	1028	1022	1064
1019	953	865	775							
6	5	5	718	680	659	652	661	682	743	837
923	978	1008	1022							
6	5	5	1025	1004	992	1002	1017	1028	1042	1082
1039	953	845	751							
6	6	5	696	666	653	659	707	807	936	1041
1111	1163	1186	1203							
6	6	5	1207	1208	1202	1197	1181	1151	1136	1174
1108	1008	886	783							
6	7	5	727	694	678	679	723	816	934	1041
1113	1168	1196	1202							

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6	7	5	1200	1198	1183	1169	1148	1115	1090	1126
1066	974	862	762							
6	8	5	707	679	662	666	704	773	862	945
1008	1064	1067	1069							
6	8	5	1072	1072	1069	1075	1067	1062	1067	1098
1041	952	848	752							
6	9	5	699	670	655	659	701	801	912	994
1059	1096	1124	1135							
6	9	5	1138	1137	1139	1136	1113	1087	1075	1118
1056	963	851	755							
6	10	5	699	667	653	659	701	791	908	1004
1076	1120	1143	1152							
6	10	5	1154	1146	1148	1139	1118	1090	1054	1089
1033	957	867	774							
6	11	5	716	682	661	657	673	707	776	876
961	1011	1035	1041							
6	11	5	1033	1025	1021	1028	1023	1009	1004	1037
993	929	851	767							
6	12	5	709	673	651	646	656	675	731	811
888	944	964	975							
6	12	5	975	976	984	995	1004	996	992	1041
1015	948	846	752							
6	13	5	698	672	658	667	713	808	919	1014
1094	1145	1170	1183							
6	13	5	1183	1185	1188	1171	1154	1129	1113	1159
1094	996	870	767							
6	14	5	708	676	657	655	701	799	923	1011
1077	1130	1151	1171							
6	14	5	1173	1173	1154	1145	1132	1106	1092	1138
1080	982	860	757							
6	15	5	705	676	661	666	710	816	927	999
1064	1105	1136	1149							
6	15	5	1157	1155	1143	1127	1118	1109	1103	1137
1082	982	862	763							
6	16	5	708	679	663	665	708	809	931	1015
1094	1138	1167	1171							
6	16	5	1173	1181	1175	1163	1145	1115	1103	1139
1080	983	867	766							
6	17	5	709	679	661	664	708	809	930	1014
1085	1137	1167	1174							
6	17	5	1180	1175	1176	1167	1142	1115	1082	1112
1059	980	882	791							
6	18	5	728	692	673	669	683	720	792	899
986	1034	1056	1062							
6	18	5	1051	1037	1033	1039	1030	1019	1019	1057
1012	940	865	774							
6	19	5	717	679	661	656	669	688	737	824
906	959	984	991							
6	19	5	996	996	999	1014	1024	1035	1042	1096
1056	975	869	773							
6	20	5	717	688	673	678	724	825	942	1030
1097	1151	1179	1190							
6	20	5	1186	1183	1175	1161	1150	1125	1112	1162
1097	996	876	777							
6	21	5	718	686	671	677	722	824	940	1057
1136	1186	1210	1224							
6	21	5	1231	1231	1229	1211	1187	1157	1119	1161
1102	1001	882	782							
6	22	5	725	695	678	682	727	846	961	1054
1129	1169	1194	1203							
6	22	5	1207	1208	1214	1205	1150	1135	1123	1156
1101	1002	882	781							
6	23	5	723	689	673	681	723	819	935	1028

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1096	1145	1168	1183							
6	23	5	1191	1198	1198	1188	1151	1132	1113	1156
1097	997	873	772							
6	24	5	714	683	666	673	711	810	932	1032
1112	1158	1183	1183							
6	24	5	1186	1187	1177	1168	1145	1111	1084	1110
1047	972	876	784							
6	25	5	726	690	672	666	682	716	793	900
976	1027	1044	1040							
6	25	5	1030	1013	998	1003	1003	1002	988	1031
996	930	847	765							
6	26	5	705	674	656	653	664	684	734	821
898	950	981	983							
6	26	5	983	975	969	980	994	1003	1012	1061
1021	943	842	749							
6	27	5	695	667	655	664	713	811	927	1001
1085	1132	1140	1162							
6	27	5	1154	1154	1145	1140	1125	1104	1094	1133
1069	975	857	761							
6	28	5	707	679	662	666	711	815	919	997
1069	1113	1146	1149							
6	28	5	1151	1151	1150	1139	1115	1096	1088	1125
1067	970	857	761							
6	29	5	704	675	658	663	703	803	912	996
1067	1113	1143	1144							
6	29	5	1154	1148	1144	1138	1118	1102	1087	1125
1072	982	867	767							
6	30	5	708	674	659	661	703	795	906	998
1076	1122	1137	1144							
6	30	5	1155	1149	1148	1135	1115	1082	1064	1101
1044	968	872	781							
7	1	5	713	681	659	653	668	690	755	840
922	980	999	1003							
7	1	5	997	992	987	992	993	979	946	958
908	905	853	769							
7	2	5	709	674	656	653	667	693	759	863
952	1006	1033	1041							
7	2	5	1034	1024	1018	1026	1026	1015	1005	1046
999	936	857	772							
7	3	5	713	680	662	656	664	680	722	807
886	941	970	976							
7	3	5	969	967	970	985	1000	1007	1008	1061
1019	944	848	760							
7	4	5	713	681	659	653	668	690	755	840
922	980	999	1003							
7	4	5	997	992	987	992	993	979	946	958
908	905	853	769							
7	5	5	714	689	672	675	713	815	921	994
1062	1116	1137	1142							
7	5	5	1141	1134	1137	1133	1114	1090	1072	1121
1061	969	855	760							
7	6	5	706	679	665	669	705	805	919	1005
1077	1116	1134	1140							
7	6	5	1154	1149	1146	1136	1112	1088	1063	1112
1058	961	848	755							
7	7	5	702	671	657	663	705	796	910	993
1056	1107	1123	1141							
7	7	5	1150	1153	1147	1142	1123	1098	1079	1127
1069	980	861	761							
7	8	5	706	679	662	666	704	795	912	1005
1075	1129	1155	1164							
7	8	5	1168	1168	1162	1155	1134	1105	1070	1106
1047	971	878	789							

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7	9	5	727	693	676	671	683	720	791	897
992	1037	1063	1074							
7	9	5	1066	1051	1045	1049	1040	1031	1029	1071
1027	966	882	797							
7	10	5	735	700	678	674	683	702	744	830
913	978	1005	1017							
7	10	5	1017	1014	1017	1031	1038	1043	1037	1087
1049	970	868	773							
7	11	5	720	694	682	690	737	841	962	1051
1124	1172	1201	1218							
7	11	5	1219	1213	1211	1205	1178	1164	1147	1180
1116	1014	898	802							
7	12	5	738	709	696	699	744	848	958	1045
1102	1155	1179	1201							
7	12	5	1203	1211	1213	1207	1182	1158	1152	1192
1130	1027	907	799							
7	13	5	744	712	696	701	743	850	970	1062
1122	1172	1195	1189							
7	13	5	1194	1192	1190	1184	1162	1139	1117	1159
1100	1008	889	787							
7	14	5	731	701	683	688	730	825	935	1025
1102	1158	1189	1196							
7	14	5	1205	1209	1194	1184	1161	1142	1128	1159
1103	1004	890	790							
7	15	5	731	700	683	688	734	826	940	1033
1109	1164	1184	1195							
7	15	5	1196	1198	1197	1182	1158	1122	1084	1114
1064	987	884	797							
7	16	5	741	705	687	680	696	731	803	921
1013	1066	1084	1082							
7	16	5	1072	1067	1063	1070	1066	1055	1047	1083
1038	979	891	807							
7	17	5	743	707	688	683	692	717	764	852
935	1001	1026	1042							
7	17	5	1036	1035	1034	1041	1052	1059	1068	1103
1059	984	880	787							
7	18	5	731	696	683	688	732	833	944	1036
1112	1164	1189	1198							
7	18	5	1198	1201	1197	1180	1158	1129	1119	1161
1090	997	879	781							
7	19	5	726	695	677	682	722	823	929	1022
1094	1144	1168	1183							
7	19	5	1183	1183	1183	1177	1152	1123	1105	1155
1091	999	878	780							
7	20	5	723	692	676	679	720	816	928	1022
1092	1144	1170	1188							
7	20	5	1194	1201	1205	1185	1161	1136	1121	1161
1103	1010	888	790							
7	21	5	732	703	687	690	731	837	946	1035
1116	1172	1196	1202							
7	21	5	1219	1220	1211	1207	1189	1173	1177	1200
1133	1038	918	817							
7	22	5	760	725	707	711	752	855	973	1080
1166	1223	1254	1263							
7	22	5	1279	1275	1271	1256	1230	1200	1159	1195
1135	1058	955	856							
7	23	5	787	750	728	716	732	773	831	924
1018	1075	1074	1060							
7	23	5	1043	1025	1024	1043	1051	1045	1046	1076
1034	968	886	801							
7	24	5	739	703	684	676	689	714	757	841
935	1004	1033	1052							
7	24	5	1055	1062	1064	1078	1093	1094	1113	1156

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1109	1026	913	813							
7	25	5	756	726	711	714	759	865	982	1077
1168	1202	1228	1248							
7	25	5	1248	1245	1250	1243	1224	1200	1180	1211
1137	1029	912	809							
7	26	5	747	717	701	704	748	854	969	1062
1140	1158	1208	1217							
7	26	5	1230	1224	1224	1211	1190	1158	1139	1182
1112	1012	888	790							
7	27	5	732	702	689	692	733	836	946	1033
1105	1146	1176	1176							
7	27	5	1194	1194	1184	1177	1161	1133	1117	1155
1091	988	878	779							
7	28	5	726	696	681	685	727	834	944	1028
1102	1147	1179	1182							
7	28	5	1183	1182	1183	1178	1161	1135	1120	1170
1094	1002	884	785							
7	29	5	727	695	678	682	719	826	937	1032
1110	1152	1167	1174							
7	29	5	1184	1182	1178	1165	1134	1099	1067	1101
1042	964	871	782							
7	30	5	726	693	674	670	684	718	787	890
977	1033	1052	1051							
7	30	5	1040	1033	1032	1036	1035	1026	1026	1058
1005	933	862	782							
7	31	5	722	690	670	668	678	709	745	829
902	963	987	1000							
7	31	5	997	995	996	1004	1018	1022	1023	1080
1037	961	858	759							
8	1	5	710	686	676	678	713	808	924	1015
1104	1166	1198	1216							
8	1	5	1225	1232	1226	1218	1193	1163	1154	1203
1108	997	871	782							
8	2	5	726	700	687	689	723	822	929	1042
1134	1197	1229	1249							
8	2	5	1266	1274	1264	1253	1225	1197	1193	1223
1145	1030	899	799							
8	3	5	750	724	711	716	753	854	971	1073
1162	1226	1250	1267							
8	3	5	1280	1286	1279	1270	1232	1196	1182	1229
1153	1042	911	808							
8	4	5	756	729	714	713	753	856	971	1053
1129	1193	1215	1225							
8	4	5	1237	1244	1243	1233	1204	1167	1159	1208
1126	1017	886	793							
8	5	5	742	714	701	705	740	845	955	1039
1121	1169	1196	1200							
8	5	5	1211	1214	1214	1193	1153	1119	1091	1111
1042	965	869	785							
8	6	5	734	704	688	685	698	733	795	897
994	1047	1062	1063							
8	6	5	1058	1044	1035	1036	1032	1021	1028	1071
1015	951	864	786							
8	7	5	735	704	687	682	690	712	748	818
901	958	989	994							
8	7	5	995	990	994	1002	1021	1027	1044	1096
1042	961	861	770							
8	8	5	720	698	687	693	732	837	955	1045
1129	1179	1211	1226							
8	8	5	1232	1232	1233	1219	1190	1167	1163	1200
1112	1004	881	787							
8	9	5	737	710	697	700	738	845	960	1046
1116	1175	1208	1219							

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8	9	5	1226	1225	1233	1228	1203	1167	1170	1200
1119	1008	884	791							
8	10	5	739	713	701	704	743	854	974	1050
1134	1186	1207	1225							
8	10	5	1232	1235	1229	1208	1189	1163	1158	1197
1129	1011	886	797							
8	11	5	747	720	709	712	752	850	985	1053
1125	1173	1196	1205							
8	11	5	1212	1211	1211	1197	1170	1134	1128	1161
1087	988	883	790							
8	12	5	737	709	694	695	727	805	889	989
1077	1128	1154	1158							
8	12	5	1162	1157	1154	1146	1139	1102	1091	1117
1052	982	884	801							
8	13	5	747	716	701	696	711	751	808	917
1013	1072	1091	1091							
8	13	5	1082	1071	1068	1073	1073	1067	1074	1104
1050	970	890	810							
8	14	5	754	723	706	701	709	734	766	853
942	1002	1035	1041							
8	14	5	1041	1041	1045	1059	1073	1080	1098	1139
1077	984	874	786							
8	15	5	737	713	700	704	747	854	964	1056
1145	1201	1228	1244							
8	15	5	1247	1244	1239	1225	1197	1163	1170	1209
1117	1004	877	790							
8	16	5	739	714	703	706	743	855	974	1061
1135	1203	1226	1232							
8	16	5	1249	1249	1249	1240	1211	1174	1182	1221
1134	1023	892	797							
8	17	5	750	725	713	716	756	874	995	1075
1154	1208	1233	1244							
8	17	5	1256	1252	1259	1256	1218	1193	1207	1221
1134	1029	902	808							
8	18	5	757	731	715	720	759	877	998	1073
1153	1205	1235	1239							
8	18	5	1233	1235	1232	1208	1178	1158	1193	1208
1130	1020	892	799							
8	19	5	748	721	708	711	750	863	981	1072
1149	1190	1215	1226							
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1080	1003	905	815							
8	20	5	758	726	709	703	716	753	812	918
995	1047	1071	1082							
8	20	5	1071	1047	1033	1044	1039	1036	1044	1068
1014	943	862	786							
8	21	5	735	704	688	686	695	722	754	827
918	979	1007	1010							
8	21	5	1008	1009	1003	1015	1028	1040	1082	1119
1050	958	849	765							
8	22	5	720	698	687	693	739	857	965	1045
1120	1178	1204	1218							
8	22	5	1225	1230	1232	1223	1198	1175	1188	1216
1125	1009	874	783							
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1147	1196	1222	1237							
8	23	5	1247	1249	1253	1246	1188	1158	1185	1207
1117	1002	868	777							
8	24	5	731	704	692	698	742	858	968	1035
1111	1155	1178	1189							
8	24	5	1196	1198	1203	1193	1171	1139	1162	1183
1096	986	858	769							
8	25	5	720	698	683	689	734	846	960	1038

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1112	1165	1190	1201							
8	25	5	1208	1192	1179	1163	1133	1110	1132	1150
1063	962	844	758							
8	26	5	709	685	672	676	718	820	929	1014
1096	1159	1174	1177							
8	26	5	1189	1183	1185	1185	1147	1122	1129	1134
1061	981	882	799							
8	27	5	743	713	698	694	703	742	798	911
1013	1071	1094	1106							
8	27	5	1096	1084	1073	1069	1061	1047	1072	1083
1018	962	885	803							
8	28	5	748	719	703	696	704	734	769	855
947	1009	1030	1039							
8	28	5	1044	1042	1035	1046	1051	1046	1080	1087
1044	982	891	810							
8	29	5	754	726	710	709	721	758	803	883
973	1038	1061	1077							
8	29	5	1062	1048	1050	1052	1071	1088	1145	1146
1062	963	849	768							
8	30	5	727	702	693	701	748	870	995	1059
1146	1197	1211	1222							
8	30	5	1230	1233	1229	1209	1179	1153	1203	1207
1116	1004	873	782							
8	31	5	734	710	698	704	743	862	973	1042
1110	1154	1182	1201							
8	31	5	1214	1216	1218	1207	1175	1149	1207	1182
1112	993	868	774							
9	1	5	725	700	683	690	741	861	974	1048
1118	1165	1189	1198							
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1072	976	859	768							
9	2	5	741	712	696	700	748	869	981	1051
1120	1155	1184	1197							
9	2	5	1198	1192	1196	1176	1145	1113	1141	1119
1055	984	892	802							
9	3	5	744	712	692	689	705	753	818	927
1019	1066	1084	1091							
9	3	5	1082	1073	1066	1073	1071	1066	1113	1106
1041	981	895	810							
9	4	5	753	718	696	687	702	734	770	856
945	998	1032	1040							
9	4	5	1040	1033	1034	1048	1057	1061	1122	1122
1057	975	870	778							
9	5	5	764	732	714	713	727	767	816	898
987	1048	1070	1085							
9	5	5	1071	1058	1059	1062	1079	1095	1147	1149
1071	977	864	778							
9	6	5	738	709	696	702	752	876	982	1050
1123	1176	1194	1200							
9	6	5	1211	1215	1221	1213	1182	1168	1228	1201
1114	1001	874	784							
9	7	5	733	707	691	695	742	870	975	1024
1123	1153	1178	1186							
9	7	5	1197	1201	1201	1185	1153	1140	1197	1172
1086	985	867	776							
9	8	5	726	697	685	693	744	868	981	1029
1103	1159	1178	1186							
9	8	5	1186	1179	1180	1144	1126	1119	1184	1156
1073	973	858	765							
9	9	5	719	691	677	685	733	856	967	1041
1126	1170	1192	1201							
9	9	5	1215	1207	1202	1181	1146	1126	1161	1116
1050	979	883	794							

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9	10	5	739	705	688	685	701	749	811	930
1022	1071	1096	1108							
9	10	5	1094	1084	1073	1078	1073	1055	1036	1046
1011	948	873	791							
9	11	5	734	701	682	675	685	715	753	852
939	1000	1031	1043							
9	11	5	1046	1045	1055	1066	1075	1086	1163	1139
1073	980	869	781							
9	12	5	730	705	693	701	745	864	974	1057
1140	1180	1205	1223							
9	12	5	1226	1226	1221	1205	1176	1164	1237	1205
1119	999	881	788							
9	13	5	734	708	694	700	749	867	982	1042
1131	1176	1197	1202							
9	13	5	1212	1218	1221	1208	1187	1165	1245	1212
1125	1017	895	800							
9	14	5	748	722	706	702	748	870	980	1028
1133	1176	1196	1207							
9	14	5	1222	1223	1226	1215	1192	1174	1242	1200
1113	1010	890	799							
9	15	5	741	713	699	703	749	872	986	1049
1131	1178	1202	1216							
9	15	5	1228	1228	1232	1222	1195	1172	1247	1200
1126	1015	888	793							
9	16	5	742	709	696	697	745	864	976	1055
1118	1153	1184	1200							
9	16	5	1205	1206	1210	1186	1165	1131	1163	1113
1043	965	873	791							
9	17	5	735	700	681	677	690	733	796	910
991	1045	1063	1062							
9	17	5	1059	1045	1041	1050	1047	1046	1101	1057
1004	932	867	780							
9	18	5	728	698	679	672	680	710	752	848
943	1004	1032	1053							
9	18	5	1051	1055	1058	1072	1082	1100	1181	1156
1084	991	875	787							
9	19	5	730	708	696	702	757	876	1002	1043
1127	1180	1203	1231							
9	19	5	1241	1252	1241	1221	1194	1189	1277	1225
1134	1020	891	794							
9	20	5	742	716	704	708	760	882	996	1065
1147	1190	1220	1223							
9	20	5	1237	1242	1246	1243	1208	1196	1277	1226
1139	1027	905	808							
9	21	5	754	730	718	722	774	900	1017	1092
1172	1216	1241	1226							
9	21	5	1264	1274	1266	1237	1216	1203	1292	1226
1164	1046	914	818							
9	22	5	764	737	724	731	782	909	1025	1100
1164	1198	1232	1247							
9	22	5	1255	1257	1261	1261	1232	1233	1309	1254
1165	1053	930	829							
9	23	5	769	740	724	725	774	894	1009	1093
1169	1222	1236	1243							
9	23	5	1255	1252	1250	1235	1208	1190	1246	1184
1118	1038	934	841							
9	24	5	775	737	716	709	725	768	836	956
1046	1095	1116	1127							
9	24	5	1126	1116	1110	1108	1095	1077	1133	1088
1025	961	886	799							
9	25	5	740	705	684	674	683	711	749	846
942	1001	1031	1048							
9	25	5	1056	1065	1067	1074	1088	1098	1187	1155

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1080	992	880	782							
9	26	5	731	704	691	697	747	861	975	1057
1155	1202	1221	1228							
9	26	5	1232	1230	1228	1223	1208	1226	1290	1227
1129	1019	891	793							
9	27	5	744	714	700	702	750	872	976	1053
1128	1175	1203	1220							
9	27	5	1235	1237	1230	1213	1195	1206	1279	1208
1116	1008	894	796							
9	28	5	743	718	702	704	750	872	986	1055
1135	1180	1205	1221							
9	28	5	1235	1246	1255	1249	1230	1218	1297	1237
1137	1030	900	803							
9	29	5	747	717	700	704	751	875	982	1064
1141	1181	1213	1227							
9	29	5	1241	1241	1237	1236	1218	1216	1287	1231
1139	1033	911	815							
9	30	5	759	730	717	722	766	883	999	1082
1155	1184	1195	1211							
9	30	5	1218	1217	1215	1200	1179	1185	1205	1143
1080	1002	904	815							
10	1	5	748	716	690	687	703	749	812	937
1038	1090	1102	1107							
10	1	5	1105	1095	1087	1084	1079	1081	1154	1101
1043	974	883	799							
10	2	5	742	708	684	680	691	724	758	846
932	984	1015	1025							
10	2	5	1032	1034	1036	1051	1056	1069	1155	1115
1040	962	863	773							
10	3	5	727	705	691	699	746	862	973	1056
1140	1194	1221	1238							
10	3	5	1244	1250	1246	1235	1208	1208	1285	1217
1132	1010	898	800							
10	4	5	746	715	703	705	751	862	965	1050
1117	1165	1196	1207							
10	4	5	1217	1210	1181	1166	1154	1154	1234	1163
1083	975	863	775							
10	5	5	727	701	689	694	740	852	955	1045
1116	1172	1187	1196							
10	5	5	1215	1202	1190	1174	1163	1181	1235	1170
1079	981	868	775							
10	6	5	731	708	693	699	751	870	980	1063
1137	1186	1220	1238							
10	6	5	1242	1239	1234	1202	1179	1175	1262	1185
1094	993	875	784							
10	7	5	736	711	698	704	747	856	961	1050
1131	1186	1216	1224							
10	7	5	1240	1234	1225	1215	1173	1166	1203	1127
1062	983	892	804							
10	8	5	750	718	699	694	710	750	815	927
1022	1070	1095	1094							
10	8	5	1092	1080	1062	1056	1055	1080	1102	1056
997	933	864	788							
10	9	5	733	703	683	677	688	717	752	844
935	996	1034	1047							
10	9	5	1047	1049	1051	1054	1068	1106	1159	1102
1038	963	869	785							
10	10	5	738	710	695	697	728	803	898	998
1092	1155	1188	1190							
10	10	5	1192	1186	1182	1174	1161	1175	1248	1185
1090	982	865	776							
10	11	5	731	705	692	697	738	859	972	1042
1107	1154	1179	1192							

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10	11	5	1196	1199	1195	1188	1160	1173	1244	1172
1072	966	851	764							
10	12	5	719	695	685	689	733	853	970	1032
1107	1147	1169	1173							
10	12	5	1170	1164	1143	1130	1120	1140	1200	1136
1044	949	832	750							
10	13	5	707	682	671	676	718	840	959	1021
1095	1138	1157	1170							
10	13	5	1173	1168	1169	1163	1140	1138	1224	1147
1063	963	847	763							
10	14	5	716	689	676	682	724	838	959	1022
1095	1131	1147	1166							
10	14	5	1177	1178	1177	1161	1132	1137	1161	1092
1024	950	853	767							
10	15	5	716	687	666	663	677	717	778	879
971	1032	1063	1069							
10	15	5	1058	1045	1028	1034	1034	1050	1098	1035
981	911	830	751							
10	16	5	702	674	656	650	657	683	715	805
894	948	979	994							
10	16	5	1001	1001	997	1007	1022	1077	1120	1060
997	909	808	732							
10	17	5	691	670	661	669	711	828	943	1007
1090	1141	1172	1196							
10	17	5	1207	1202	1196	1182	1166	1194	1242	1173
1078	960	839	750							
10	18	5	703	676	660	666	708	828	935	1007
1083	1135	1168	1183							
10	18	5	1200	1194	1190	1178	1150	1172	1238	1165
1079	964	840	755							
10	19	5	708	684	674	679	719	839	955	1027
1112	1155	1178	1198							
10	19	5	1215	1217	1217	1210	1183	1200	1265	1196
1096	988	861	770							
10	20	5	721	695	682	687	732	850	965	1041
1130	1182	1208	1225							
10	20	5	1240	1250	1254	1240	1211	1224	1281	1212
1122	1008	901	805							
10	21	5	750	723	710	708	757	869	1000	1072
1146	1195	1225	1235							
10	21	5	1246	1239	1224	1208	1187	1204	1211	1137
1077	990	895	806							
10	22	5	750	720	702	696	712	759	828	930
1034	1094	1121	1128							
10	22	5	1127	1123	1120	1113	1091	1108	1149	1083
1020	963	882	799							
10	23	5	738	706	688	681	687	722	759	852
957	1019	1048	1064							
10	23	5	1073	1080	1087	1100	1112	1175	1229	1165
1089	994	875	782							
10	24	5	730	703	691	697	745	869	989	1070
1147	1202	1240	1258							
10	24	5	1269	1263	1262	1244	1220	1269	1316	1235
1143	1023	883	783							
10	25	5	765	736	722	728	785	921	1050	1108
1175	1228	1256	1272							
10	25	5	1215	1212	1210	1200	1164	1232	1273	1191
1105	996	871	778							
10	26	5	735	711	700	705	750	882	1001	1066
1154	1194	1216	1221							
10	26	5	1228	1224	1223	1198	1178	1243	1272	1199
1115	1006	882	786							
10	27	5	738	713	699	703	750	877	1000	1054

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1127	1181	1203	1210							
10	27	5	1212	1200	1186	1182	1168	1231	1258	1179
1105	993	874	778							
10	28	5	723	697	686	687	739	857	974	1041
1132	1174	1196	1206							
10	28	5	1208	1208	1204	1208	1174	1163	1101	1042
1005	952	869	787							
10	29	5	732	705	686	682	696	738	796	910
1014	1073	1102	1107							
10	29	5	1096	1091	1074	1074	1058	1089	1125	1063
1007	938	864	781							
10	30	5	728	695	677	673	687	717	752	837
920	972	997	1006							
10	30	5	1012	1024	1029	1029	1042	1098	1152	1095
1025	943	837	751							
10	31	5	707	687	675	682	730	852	978	1042
1125	1165	1188	1199							
10	31	5	1202	1190	1174	1160	1142	1202	1235	1160
1066	954	848	758							
11	1	5	719	693	681	689	739	867	995	1049
1112	1171	1212	1216							
11	1	5	1216	1213	1213	1202	1166	1213	1262	1185
1096	996	872	779							
11	2	5	729	703	690	697	743	875	1000	1069
1145	1196	1226	1243							
11	2	5	1248	1255	1243	1235	1215	1264	1296	1217
1094	987	863	769							
11	3	5	720	695	680	687	736	865	995	1059
1145	1202	1217	1219							
11	3	5	1217	1208	1216	1206	1184	1230	1283	1198
1108	991	870	777							
11	4	5	726	700	685	689	737	861	989	1068
1144	1195	1217	1232							
11	4	5	1249	1253	1246	1223	1185	1222	1232	1143
1076	988	885	794							
11	5	5	737	707	687	681	696	734	798	911
1012	1059	1077	1082							
11	5	5	1072	1064	1053	1055	1065	1113	1145	1077
1014	946	860	776							
11	6	5	726	694	674	670	683	715	750	842
935	997	1017	1024							
11	6	5	1024	1017	1024	1031	1050	1125	1173	1115
1039	956	854	768							
11	7	5	724	700	688	697	744	860	989	1073
1158	1208	1217	1226							
11	7	5	1229	1216	1212	1196	1171	1236	1250	1158
1070	978	868	781							
11	8	5	728	700	686	688	715	786	857	947
1028	1087	1108	1113							
11	8	5	1105	1099	1091	1087	1092	1181	1215	1143
1048	943	836	751							
11	9	5	707	683	672	676	723	848	976	1013
1094	1136	1151	1158							
11	9	5	1167	1174	1156	1150	1124	1210	1227	1156
1055	950	825	734							
11	10	5	718	693	683	689	740	845	983	997
1072	1120	1145	1141							
11	10	5	1152	1145	1124	1119	1091	1177	1194	1116
1027	925	812	730							
11	11	5	687	667	653	663	712	833	953	1009
1092	1129	1156	1128							
11	11	5	1164	1163	1151	1131	1103	1144	1145	1076
1014	934	841	759							

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11	12	5	711	683	665	662	677	722	782	860
975	1027	1041	1035							
11	12	5	1023	1009	1000	1005	1008	1072	1087	1023
962	912	827	750							
11	13	5	701	676	658	656	665	695	728	813
900	959	977	994							
11	13	5	995	989	979	990	1011	1102	1140	1083
1012	929	824	739							
11	14	5	696	674	665	673	721	844	976	1028
1107	1151	1173	1188							
11	14	5	1188	1188	1189	1174	1148	1213	1252	1170
1072	964	842	753							
11	15	5	705	683	669	676	727	855	982	1024
1100	1144	1177	1184							
11	15	5	1195	1189	1188	1169	1136	1215	1236	1155
1063	948	831	739							
11	16	5	694	672	663	669	717	840	964	979
1020	1058	1059	1056							
11	16	5	1058	1049	1040	1031	1040	1113	1124	1076
979	881	774	697							
11	17	5	676	656	646	654	676	799	913	947
1001	1044	1053	1055							
11	17	5	1065	1058	1056	1046	1023	1103	1144	1073
991	890	782	701							
11	18	5	663	642	632	638	682	796	913	955
1022	1053	1077	1077							
11	18	5	1079	1078	1072	1059	1036	1098	1098	1025
962	890	800	724							
11	19	5	675	649	634	633	647	687	747	845
939	988	1006	1005							
11	19	5	995	981	981	976	979	1048	1060	994
937	889	811	732							
11	20	5	681	654	642	637	647	675	715	794
872	932	950	959							
11	20	5	959	961	958	968	996	1086	1119	1068
988	905	799	716							
11	21	5	672	652	641	648	694	807	926	981
1059	1107	1128	1143							
11	21	5	1148	1148	1145	1139	1121	1209	1226	1141
1056	946	826	734							
11	22	5	689	666	654	661	711	835	963	991
1073	1129	1154	1156							
11	22	5	1164	1160	1154	1137	1119	1206	1229	1148
1068	955	830	740							
11	23	5	693	668	658	664	710	826	948	1001
1077	1127	1140	1144							
11	23	5	1152	1155	1152	1139	1113	1185	1205	1119
1049	959	858	762							
11	24	5	701	671	653	650	668	705	753	851
962	1041	1077	1076							
11	24	5	1051	1028	1008	993	970	985	969	938
911	882	807	727							
11	25	5	683	665	653	659	693	762	842	939
1041	1100	1120	1128							
11	25	5	1128	1125	1120	1092	1085	1174	1159	1089
1028	961	867	784							
11	26	5	728	699	683	680	696	742	804	904
1002	1064	1070	1068							
11	26	5	1046	1028	1007	1008	1024	1103	1128	1073
1019	949	857	775							
11	27	5	681	654	642	637	647	675	715	794
872	932	950	959							
11	27	5	959	961	958	968	996	1086	1119	1068

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988	905	799	716							
11	28	5	672	652	641	648	694	807	926	981
1059	1107	1128	1143							
11	28	5	1148	1148	1145	1139	1121	1209	1226	1141
1056	946	826	734							
11	29	5	673	650	639	647	692	810	931	968
1036	1069	1083	1089							
11	29	5	1092	1091	1092	1082	1070	1143	1187	1115
1029	922	805	717							
11	30	5	668	644	636	642	685	802	925	962
1034	1073	1098	1104							
11	30	5	1109	1107	1100	1090	1083	1178	1195	1125
1039	933	814	725							
12	1	5	664	642	635	642	684	807	932	979
1054	1097	1111	1103							
12	1	5	1121	1129	1125	1116	1110	1197	1229	1148
1074	961	835	739							
12	2	5	688	663	653	658	704	824	964	1019
1094	1140	1165	1175							
12	2	5	1178	1171	1165	1159	1142	1208	1205	1122
1061	974	874	779							
12	3	5	717	685	669	665	681	732	797	906
1007	1069	1094	1094							
12	3	5	1092	1073	1070	1074	1074	1131	1132	1066
1019	948	866	776							
12	4	5	711	677	660	653	665	698	736	818
917	980	1011	1026							
12	4	5	1029	1009	992	993	1015	1136	1179	1110
1046	929	818	725							
12	5	5	679	655	644	653	700	814	951	987
1053	1093	1115	1114							
12	5	5	1114	1110	1094	1090	1089	1205	1224	1145
1051	943	814	722							
12	6	5	677	653	644	650	694	813	963	983
1057	1097	1098	1116							
12	6	5	1123	1122	1121	1114	1101	1209	1250	1166
1078	964	827	732							
12	7	5	687	661	652	658	699	824	970	1001
1059	1097	1115	1119							
12	7	5	1118	1125	1121	1118	1107	1205	1245	1166
1078	968	831	735							
12	8	5	684	660	648	653	694	815	945	976
1047	1094	1104	1101							
12	8	5	1101	1105	1101	1088	1078	1153	1206	1131
1045	942	815	720							
12	9	5	675	648	638	642	686	799	936	970
1043	1069	1097	1100							
12	9	5	1104	1104	1104	1088	1075	1128	1155	1079
1019	953	847	755							
12	10	5	695	661	648	647	662	701	761	845
936	980	985	981							
12	10	5	980	951	947	958	976	1058	1079	1019
971	919	832	746							
12	11	5	690	662	648	642	653	677	712	779
875	925	936	945							
12	11	5	939	935	943	960	982	1081	1161	1096
1037	951	824	724							
12	12	5	677	656	644	651	695	812	946	983
1041	1075	1107	1108							
12	12	5	1105	1107	1100	1088	1070	1146	1218	1148
1062	952	818	721							
12	13	5	668	642	630	638	675	786	911	927
1010	1057	1079	1086							

					HourL					
12	13	5	1110	1111	1114	1092	1075	1140	1205	1128
1049	947	812	716							
12	14	5	670	646	635	640	679	790	922	934
958	1023	1034	1032							
12	14	5	1036	1028	1024	1020	1012	1097	1150	1089
1012	921	795	702							
12	15	5	655	630	623	630	670	776	904	925
988	1019	1033	1025							
12	15	5	1019	1009	1010	1003	1000	1073	1131	1096
1017	931	806	716							
12	16	5	664	640	628	633	670	774	903	933
1001	1038	1046	1042							
12	16	5	1038	1034	1026	1025	1014	1070	1112	1036
974	913	815	727							
12	17	5	674	646	632	628	643	680	739	824
919	969	983	991							
12	17	5	986	970	961	969	977	1042	1085	1019
959	909	826	737							
12	18	5	680	649	630	625	633	660	694	762
837	883	901	903							
12	18	5	904	901	903	918	934	1010	1088	1036
981	910	814	723							
12	19	5	671	645	634	640	674	759	856	936
1034	1094	1105	1111							
12	19	5	1110	1111	1107	1100	1079	1125	1197	1123
1058	971	850	747							
12	20	5	694	664	652	655	691	780	894	968
1043	1098	1110	1104							
12	20	5	1107	1096	1094	1086	1066	1126	1194	1122
1061	982	871	768							
12	21	5	706	674	658	661	698	784	889	964
1053	1105	1115	1097							
12	21	5	1083	1075	1071	1083	1086	1115	1098	1006
958	915	849	772							
12	22	5	715	677	654	646	655	680	708	766
848	909	935	939							
12	22	5	932	929	926	933	939	951	987	970
939	896	817	732							
12	23	5	684	653	641	640	666	727	799	875
982	1057	1090	1098							
12	23	5	1092	1094	1085	1082	1079	1128	1193	1107
1026	939	833	742							
12	24	5	685	657	640	638	652	683	735	801
907	987	1010	1014							
12	24	5	1001	992	977	979	998	1077	1118	1051
986	915	819	726							
12	25	5	715	677	654	646	655	680	708	766
848	909	935	939							
12	25	5	932	929	926	933	939	951	987	970
939	896	817	732							
12	26	5	652	630	621	628	662	739	832	903
979	1032	1049	1053							
12	26	5	1051	1034	1028	1025	1038	1132	1171	1089
1006	920	815	726							
12	27	5	676	651	639	644	680	765	872	948
1023	1098	1128	1145							
12	27	5	1126	1110	1100	1103	1133	1221	1197	1111
1028	947	838	746							
12	28	5	694	663	651	654	684	759	857	918
1002	1065	1083	1086							
12	28	5	1061	1047	1041	1057	1086	1150	1104	993
919	873	831	776							
12	29	5	715	677	654	646	655	680	708	766

HourL

848	909	935	939							
12	29	5	932	929	926	933	939	951	987	970
939	896	817	732							
12	30	5	684	653	641	640	666	727	799	875
982	1057	1090	1098							
12	30	5	1092	1094	1085	1082	1079	1128	1193	1107
1026	939	833	742							
12	31	5	685	657	640	638	652	683	735	801
907	987	1010	1014							
12	31	5	1001	992	977	979	998	1077	1118	1051
986	915	819	726							

LOAD

1096	1108	1065	1056	1046	1119	1117	1154	1150	1149	1159	1171	1995
11.0000	19.0000	11.0000	20.0000	JAN								
0.5241	0.4884	0.4553	0.4456	0.4456	0.5038	0.5470	0.5987	0.7608	0.8202	0.8353	0.8298	
0.8158	0.7905	0.7907	0.7969	0.8362	0.8844	0.9641	0.9548	0.8639	0.8013	0.7088	0.5914	
0.5168	0.4763	0.4610	0.4605	0.4810	0.6276	0.7452	0.8483	0.8918	0.9324	0.9334	0.9220	
0.9251	0.9222	0.9246	0.9270	0.9391	0.9355	0.9852	1.0000	0.9229	0.8299	0.7185	0.5950	
13.0000	20.0000	15.0000	20.0000	FEB								
0.5354	0.5039	0.4761	0.47	0.4581	0.5029	0.5412	0.6238	0.7434	0.8027	0.8212	0.8186	
0.8223	0.8146	0.8128	0.8184	0.8535	0.8708	0.8692	0.8758	0.8296	0.7598	0.6744	0.5809	
0.5200	0.4815	0.4685	0.4656	0.4893	0.6104	0.7658	0.8517	0.8907	0.9400	0.9395	0.9304	
0.9228	0.9301	0.9436	0.9407	0.9610	0.9441	0.9841	1.0000	0.9286	0.8394	0.7175	0.6006	
10.0000	20.0000	12.0000	20.0000	MAR								
0.5560	0.5243	0.4911	0.4825	0.4819	0.5149	0.5586	0.6659	0.7920	0.8535	0.8497	0.8480	
0.8392	0.8170	0.8235	0.8344	0.8857	0.8839	0.9070	0.9144	0.8813	0.8210	0.7455	0.6131	
0.5241	0.4885	0.4735	0.4707	0.5021	0.5940	0.7885	0.8600	0.9441	0.9642	0.9629	0.9705	
0.9649	0.9659	0.9612	0.9580	0.9836	0.981	0.9950	1.0000	0.9474	0.8556	0.7335	0.6120	
12.0000	20.0000	13.0000	17.0000	APR								
0.6003	0.5386	0.4961	0.4859	0.4991	0.5407	0.5770	0.7424	0.8686	0.8885	0.8894	0.8903	
0.8806	0.8724	0.8778	0.8825	0.9025	0.9017	0.9033	0.9054	0.8982	0.8691	0.8347	0.6705	
0.5342	0.4979	0.4856	0.4787	0.5064	0.6530	0.8698	0.9310	0.9796	0.9876	0.9901	0.9884	
0.9911	0.9906	0.9890	0.9893	1.0000	0.9941	0.9941	0.9974	0.9839	0.9294	0.8087	0.6448	
15.0000	22.0000	11.0000	17.0000	MAY								
0.6446	0.5805	0.5351	0.5060	0.5075	0.5448	0.5920	0.7161	0.8508	0.8588	0.8582	0.8591	
0.8591	0.8589	0.8590	0.8589	0.8578	0.8568	0.8580	0.8557	0.8574	0.8587	0.8453	0.7143	
0.6071	0.5481	0.5211	0.5030	0.5432	0.6345	0.8367	0.9556	0.9894	0.9995	1.0000	0.9993	
0.9997	0.9995	0.9998	0.9988	0.9989	0.9964	0.9928	0.9958	0.9888	0.9587	0.8596	0.7165	
11.0000	20.0000	11.0000	17.0000	JUN								
0.6019	0.5583	0.5267	0.5060	0.5071	0.5335	0.5662	0.6492	0.7628	0.8319	0.8393	0.8238	
0.8252	0.8126	0.8161	0.8124	0.8430	0.8494	0.8408	0.8557	0.8457	0.8078	0.7449	0.6480	
0.5816	0.5375	0.5169	0.5030	0.5338	0.6016	0.7434	0.8564	0.943	0.9955	1.0000	0.9937	
0.9971	0.9949	0.9978	0.9888	0.9898	0.9738	0.9563	0.9704	0.9409	0.8626	0.7588	0.6603	
11.0000	20.0000	11.0000	17.0000	JUL								
0.6180	0.5667	0.5299	0.5060	0.5072	0.5378	0.5759	0.6743	0.7959	0.8420	0.8464	0.8370	
0.8379	0.8301	0.8322	0.8299	0.8486	0.8522	0.8473	0.8557	0.8501	0.8269	0.7826	0.6729	
0.5991	0.5415	0.5185	0.5030	0.5373	0.6140	0.7785	0.8937	0.9605	0.9970	1.0000	0.9958	

LOAD

0.9981 0.9966 0.9986 0.9926 0.9932 0.9823 0.9700 0.9800 0.9589 0.8988
0.7967 0.6814
11.0000 20.0000 11.0000 17.0000 AUG
0.6064 0.5607 0.5276 0.506 0.5071 0.5347 0.5689 0.6562 0.7720 0.8347
0.8413 0.8275
0.8270 0.8175 0.8206 0.8172 0.8446 0.8502 0.8426 0.8557 0.8469 0.8131
0.7554 0.6549
0.5842 0.5386 0.5174 0.5030 0.5348 0.6051 0.7532 0.8667 0.9479 0.9959
1.0000 0.9943
0.9974 0.9954 0.9980 0.9899 0.9907 0.9761 0.9601 0.9731 0.9459 0.8727
0.7693 0.6662
11.0000 19.0000 12.0000 17.0000 SEP
0.5912 0.5600 0.5368 0.5263 0.5233 0.5475 0.5689 0.6466 0.7614 0.8461
0.8499 0.8439
0.8272 0.8127 0.8088 0.8261 0.8628 0.8663 0.8873 0.8824 0.8398 0.7810
0.7061 0.6254
0.5529 0.5241 0.5063 0.4988 0.5228 0.6070 0.7201 0.8242 0.9453 0.9848
0.9935 1.0000
0.9927 0.9997 0.9921 0.9926 0.9985 0.9655 0.9725 0.9858 0.9129 0.8117
0.6956 0.6107
12.0000 18.0000 10.0000 19.0000 OCT
0.5852 0.5411 0.5193 0.5075 0.5046 0.5287 0.5716 0.6513 0.7730 0.8341
0.8476 0.8535
0.8228 0.8189 0.8268 0.8333 0.8676 0.9068 0.9035 0.8862 0.8460 0.7857
0.7015 0.6209
0.5518 0.5139 0.4986 0.4972 0.5142 0.5930 0.7399 0.8439 0.9346 0.9802
0.9703 0.9724
0.9754 0.9753 0.9782 0.9824 0.9951 0.9758 1.0000 0.9726 0.9106 0.8235
0.7044 0.6082
11.0000 19.0000 11.0000 19.0000 NOV
0.5592 0.5228 0.4931 0.4795 0.4852 0.5068 0.5528 0.6294 0.7362 0.8251
0.8325 0.8300
0.8245 0.7966 0.7948 0.8078 0.8369 0.8801 0.9192 0.8743 0.8043 0.7504
0.6727 0.5920
0.5157 0.4821 0.4668 0.4658 0.4846 0.5655 0.7238 0.8109 0.8943 0.9349
0.9459 0.9415
0.9389 0.9386 0.9386 0.9446 0.9532 0.9618 1.0000 0.9461 0.8702 0.7762
0.6764 0.5810
11.0000 19.0000 11.0000 19.0000 DEC
0.5318 0.4940 0.4680 0.4579 0.4593 0.4927 0.5277 0.5851 0.7041 0.7910
0.8081 0.7892
0.7784 0.7545 0.7532 0.7668 0.8004 0.8387 0.9190 0.8756 0.8119 0.7543
0.6675 0.5926
0.5147 0.4729 0.4549 0.4513 0.4739 0.5665 0.6845 0.7860 0.8577 0.8968
0.9047 0.8917
0.8934 0.8953 0.8963 0.8870 0.9024 0.9189 1.0000 0.9428 0.8588 0.7725
0.6727 0.5815

```
B2 B B 33  90   00.00   00.00  -1  299.026  4.3444 .009308   8760  0.01
B2  69  74  96  58 192   0
B1 B B 33  90   00.00   00.00  -1  299.026  4.3444 .009308   8760  0.01
B1  69  16  96   0  97   0
B3 B B 01  29   00.00   00.00  -1    0.010  8.7341 .000001   8760  0.01
B3  69  74  96  58 192   0
A2 A A 63 180   00.00   00.00  -1  258.748 14.9713 .0051019  8760  0.01
A2  67   0 130   0 192   0
A1 A A 63  90   00.00   00.00  -1  258.748 14.9713 .0051019  8760  0.01
A1  67   0  80   0  96   0
K5 K K 50 135  4586.0 4586.00  -1  89.3444 8.64339 .0053000  8760  0.0113
K5  60  25  70  25  80  25  90  25 100  24 110  18 120  12 130   6 140   0 142
0
W7 W S 33  88  5044.0 5044.00  -1 88.2107  7.94047 .0196100  8760  0.0119
W7  30  26  35  24  40  22  45  20  50  18  55  16  60  13  70   8  80   2  90
0
K4 K K 28  89  5044.0 5044.00  -1 75.5538  8.43939 .0073900  8760  0.0411
K4  35  25  40  22  45  20  50  17  55  15  60  13  70   9  80   3  86   1  90
0
W8 W S 33  88  5044.0 5044.00  -1 86.8712  8.09192 .0131500  8760  0.0179
W8  35  24  40  22  45  20  50  18  55  16  60  13  70   8  80   2  90   0
K2 K K 28  86  5044.0 5044.00  -1 46.0037  9.09521 .0035000  8760  0.0187
K2  30  31  35  28  40  25  45  22  50  19  55  16  60  13  70   8  80   3  85
1  88   0
K3 K K 28  88  5044.0 5044.00  -1 57.48642 8.51694 .0063400  8760  0.0168
K3  35  25  50  33  45  20  50  17  55  15  60  13  70   9  80   3  86   1  90
0
K1 K K 28  88  5044.0 5044.00  -1 73.4991  8.17333 .0129200  8760  0.018
K1  35  28  40  25  45  22  50  19  55  16  60  13  70   8  80   3  85   1  88
0
K6 K K 40 134  9274.0 9274.00  -1117.0609  8.18188 .0076900  8760  0.0219
K6  60  17  70  17  80  17  90  17 100  17 110  17 120  12 130   6 140   0 142
0
G1 W D 14  52   11.80   11.80  -1 198.6939 7.84970 .0292200  0000  0.3586
G1   5  40  10  35  15  31  20  27  25  23  30  18  35  13  40  10  52   0  53
0
G2 W D 14  50   11.80   11.80  -1 191.3958 7.27570 .0028510  0000  0.2081
G2   5  40  10  35  15  31  20  27  25  23  30  18  35  13  40  10  50   0
W6 W W 22  56  277.00  277.00  -3 64.1104  8.74074 .0319900  0000  0.033
W6  20  25  25  21  30  18  35  15  40  11  45   8  50   4  55   2  57   1
H9 H H 21  54  190.00  190.00  -3 69.89196 8.94844 .0298100  0000  0.0642
H9  20  28  25  24  30  20  35  17  40  13  45   9  50   5  55   2  57   0
W5 W W 22  55  277.00  277.00  -3 61.0595  8.81372 .0298100  0000  0.0257
W5  20  25  25  21  30  18  35  15  40  11  45   8  50   4  55   2  57   0
H8 H H 21  53  190.00  190.00  -3 36.4132  10.3115 .0056800  0000  0.0752
H8  20  22  25  20  30  17  35  16  40  11  45   8  50   4  54   1  55   0  57
0
W4 W V 21  46  377.00  377.00  -3 49.4604  9.31119 .0320300  0000  0.0616
W4  20  25  25  21  30  16  35  12 40   8  45   4  49   0
W3 W V 21  46  337.00  377.00  -3146.5394  4.81132 .0854400  0000  0.049
W3  20  25  25  21  30  16  35  12  40   8  45   4  49   0
```

SPECIAL

1	2	NEW YEARS DAY
2	20	PRESIDENTS DAY
4	17	EASTER
5	30	MEMORIAL DAY
6	12	KAMEHAMEHA DAY
7	4	INDEPENDENCE DAY
8	21	ADMISSIONS DAY
9	4	LABOR DAY
10	9	COLUMBUS DAY
11	10	VETERANS DAY
11	23	THANKSGIVING
12	25	CHRISTMAS

ORDER

01	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	G1	G2	W6	H9	W5	H8	W4	W3
02	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	G1	G2	H9	W5	H8	W4	W3
03	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	H9	G1	G2	W5	H8	W4	W3
04	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	H9	W5	G1	G2	H8	W4	W3
05	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	H9	W5	H8	G1	G2	W4	W3
06	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	H9	W5	H8	W4	G1	G2	W3
07	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	H9	W5	H8	W4	W3	G1	G2
08	B2	B1	B3	A2	A1	K5	W7	K4	W8	K2	K3	K1	K6	W6	W5	H9	H8	W4	G1	G2	W3
09	B2	A2	B3	B1	A1	K3	K6	K1	W7	K4	W8	K2	K5	H8	H9	W5	W6	G2	G1	W3	W4
10	A2	A1	B3	K6	B2	K5	W8	W7	K3	K4	K2	K1	W6	H9	B1	H8	W5	W4	W3	G1	G2
11	B2	A2	B3	B1	A1	K2	K5	W8	W7	K4	K3	K1	K6	W4	W6	H9	W5	W3	H8	G1	G2
12	B2	A2	B3	B1	A1	K2	K5	W8	W7	K4	K3	K1	K6	W4	W6	H9	G1	G2	W5	W3	H8

In Response to HECO/CA-IR-304

Production Simulation Model Program Source Code.

```
C*********************************************************************
C
C       ECONOMIC DISPATCH PROGRAM 2
C           Version 10.0
C
C     Created on:    07/28/94
C     Last Modified: 05/18/05
C
C     CREATED BY:  DR. MICHAEL J. RIDER
C
C           VARIABLE DEFINITIONS
C
C     TTY          UNIT NUMBER FOR TERMINAL I/O
C     FAST         LOGICAL FLAG (.TRUE.=QUICK,  .FALSE.=COMPLETE)
C     BEST         LOGICAL FLAG (.TRUE.=BEST SOLUTION,  .FALSE.=THEIRS)
C     WPOWER       LOGICAL FLAG (.TRUE.=WRITE POWER DATA TO FILE)
C                               (.FALSE. = DON'T WRITE DATA TO FILE)
C     WMMBTU       LOGICAL FLAG (.TRUE.=WRITE MMBTU DATA TO FILE)
C                               (.FALSE. = DON'T WRITE DATA TO FILE)
C     WBBL         LOGICAL FLAG (.TRUE.=WRITE BBL   DATA TO FILE)
C                               (.FALSE. = DON'T WRITE DATA TO FILE)
C     WCOST        LOGICAL FLAG (.TRUE.=WRITE COST  DATA TO FILE)
C                               (.FALSE. = DON'T WRITE DATA TO FILE)
C
C     PEAK         MAXIMUM PEAK VALUE USED TO ADJUST YEARLY LOAD
C     FACTOR       VALUE WHICH MODIFIES LOAD TO PRODUCE THE REQUIRED
C                   ENERGY  (DOUBLE PRECISION)
C
C     MC           MAXIMUM NUMBER OF MACHINE ALLOWED
C     FC           MAXIMUM NUMBER OF FUEL TYPES USED
C     PBRK         MAXIMUM NUMBER OF POWER BREAK POINTS IN QUICK PICK-UP
C                   (Last One = Data for Type "A" Last 6 months)
C     OT           MAXIMUM NUMBER OF COMMITMENT ORDERS AVAILABLE
C     RESERV       RESERVE POWER REQUESTED
C
C     FCODE        FUEL CODE
C     FDOLR        FUEL DOLLAR COST / BARREL
C     FBTU         FUEL MMBTU / BARREL
C     FADJST       FUEL ADJUSTMENT ( ** NOT USED **)
C
C     MACH(MC)     MACHINE NAMES
C     PLANT(MC)    PLANT NAME FOR EACH MACHINE
C     PCODE(MC)    PRICE CODE FOR EACH MACHINE
C     MIN(MC)      MINIMUM POWER FOR EACH MACHINE
C     MAX(MC)      MAXIMUM POWER FOR EACH MACHINE
C     COLD(MC)     ENERGY FOR COLD START FOR EACH MACHINE
C     HOT(MC)      ENERGY FOR HOT START FOR EACH MACHINE
C     C(MC)        C COEFFICENT FOR EACH MACHINE
C     B(MC)        B COEFFICENT FOR EACH MACHINE
C     A(MC)        A COEFFICENT FOR EACH MACHINE
C     DOLLAR(MC)   DOLLARS PER BARREL OF FUEL FOR EACH MACHINE
C     MMBTU(MC)    MMBTU PER BARREL OF FUEL FOR EACH MACHINE
C     DOLBTU(MC)   DOLLARS PER MMBTU FOR EACH MACHINE
C     LAMNA1(MC)   LAMNA AT MINIMUM POWER FOR EACH MACHINE
C     LAMNA2(MC)   LAMNA AT MAXIMUM POWER FOR EACH MACHINE
C     COST1(MC)    OPERATING COST PER MMBTU AT MINIMUM POWER
C     COST2(MC)    OPERATING COST PER MMBTU AT MAXIMUM POWER
```

```
C     STYHOT(MC)  MINIMUM NUMBER OF HOURS STAYS HOT FOR EACH MACHINE
C     MINHR(MC)   MINIMUM NUMBER OF HOURS EACH MACHINE MUST RUN / OFF
C     MPOWER(PBRK,MC)  BREAK POINTS IN MACHINE POWER CURVE
C     RPOWER(PBRK,MC)  QUICK PICK-UP POWER AT BREAK POINTS
C     STRTPK(2)   PEAK START TIME (1=WEEKENDS, 2=WEEKDAYS)
C     STOPPK(2)   PEAK STOP TIME (1=WEEKENDS, 2=WEEKDAYS)
C
C     BUYPWR      AMOUNT OF POWER BOUGHT EACH HOUR
C     PWRBUY      Yearly purchases of non-firm power
C     TOTLD       TOTAL LOAD USED EACH HOUR
C     AMT         AMOUNT BOUGHT FOR GIVEN PERIOD OF TIME
C     PEAKTM(365,2) PEAK TIME FOR EACH DAY (ONCE ON, MACHINE MUST RUN)
C                        ( ,1)=START TIME,  ( ,2)=STOP TIME
C     FDAY        FIRST/FROM DAY
C     LDAY        LAST DAY
C     FHOUR       FIRST HOUR
C     LHOUR       LAST HOUR
C     MTHMAX      MAX. POWER USED DURING EACH MONTH
C     PERCENT     PERCENT OF MAX POWER USED EACH HOUR
C     COMMIT(MC,OT) ORDERED COMMITTED MACHINE NAME LIST
C
C     KNT         ACTUAL NUMBER OF MACHINE IN LIST
C     J           DO LOOP VARIABLE
C     K           DO LOOP VARIABLE
C     MTH         MONTH VARIABLE
C     INDX        INDEX INTO SORTED MACHINE LIST
C     MONTH       CURRENT MONTH
C     DAY         CURRENT DAY
C     HOUR        CURRENT HOUR
C     D           DO LOOP VARIABLE FOR DAY
C     DOFYR       COUNTER FOR DAY OF THE YEAR
C     AVAIL(MC)   CURRENT AVAILABLE LIST FOR EACH MACHINE
C     FMONTH      FROM MONTH
C     FDAY        FROM DAY
C     TMONTH      TO MONTH
C     TDAY        TO DAY
C
C     HMONTH      HOLIDAY MONTH
C     HDAY        HOLIDAY DAY
C
C     MINP        MINIMUM POWER TOTAL
C     MAXP        MAXIMUM POWER TOTAL
C     PGT         REQUIRED POWER TO GENERATE
C     SAVPGT      SAVED REQUIRED POWER TO GENERATE
C     BACKUP      BACKUP (OFF-LINE) RESERVE POWER (NOT STEAM)
C     COMIDX(MC)  COMMITTED MACHINE INDX LIST
C     MINMAC      MINIMUM NUMBER OF BASE LINE MACHINES
C     ORDER       CURRENT COMMITMENT ORDER INDEX
C
C     AI          SUM OF 1/2A FOR ACTIVE MACHINES
C     BA          SUM OF B/2A FOR ACTIVE MACHINES
C     AT          TOTAL A
C     BT          TOTAL B
C     LAMNA       INCREMENTAL FUEL COST
C     KOUNT       DO LOOP VARIABLE
C     MINKNT      MINIMUM NUMBER OF MACHINE TO GET REQUIRED BASE LOAD
C     KNTWS       COUNTED MINIMUM NUMBER OF "W" MACHINES RUNNING
```

```
C     MAXKNT       MAXIMUM NUMBER OF MACHINE TO GET REQUIRED BASE LOAD
C     MAXSAV       MAXIMUM NUMBER SAVED (MAXKNT)
C     FIRST        MINIMUM MACHINE COUNT, FIRST OF LIST THAT MUST RUN
C     AVAIL2(MC)   WORKING LIST OF ORDERED COMMITTED MACHINES
C                  -1 = Maximum Power Exceeded
C                   0 = Minimum Power Exceeded
C                   1 = Power within Allowable Range
C
C     POWER(MC)    POWER GENERATED PER MACHINE
C     TPOWER       TOTAL VARIABLE POWER
C     TPGT         TOTAL GENERATED POWER
C     FMMBTU(MC)   MMBTU REQUIRED PER MACHINE (FROM FUEL)
C     FBBL(MC)     BARRELS OF FUEL REQUIRED PER MACHINE
C     FCOST(MC)    CURRENT FUEL COST FOR EACH MACHINE
C     TFCOST       TOTAL FUEL COST
C     IFLAG        FLAG USED FOR LOOPING UNTIL SOLUTION FOUND
C     JUMP         LOOP COUNTER BEFORE DETERMINING "NO" SOLUTION
C     MCOST        MINIMUM FUEL COST FOR THIS HOUR
C     MLAMNA       MINIMUM LAMNA FOR THIS HOUR
C     MKOUNT       NO. OF MACHINE FOR MINIMUM FUEL COST
C     MTHCST(MC)   MONTHLY COST PER MACHINE
C     LASTHR(MC)   MACHINE RUNNING LAST HOUR  0=NOT RUNNING
C     CSTART(MC)   NUMBER OF COLD STARTS PER MACHINE FOR THE MONTH
C     HSTART(MC)   NUMBER OF HOT STARTS PER MACHINE FOR THE MONTH
C     CSTYR(MC)    NUMBER OF COLD STARTS PER MACHINE FOR THE YEAR
C     HSTYR(MC)    NUMBER OF HOT STARTS PER MACHINE FOR THE YEAR
C
C     QPGOT        QUICK PICKUP POWER AVAILABLE (GOT)
C     QPNEED       QUICK PICKUP POWER NEEDED
C     MXPWR        MAXIMUM POWER PRODUCED BY ANY ONE MACHINE
C
C     DELTA        CHANGE IN LAMNA LOOKING FOR A VALID START PT.
C     EPS          CLOSENESS TO PROPER POWER BEFORE CALC. LAMNA
C     SLAMNA       SAVED LAMNA VALUE
C     SPOWER       SAVED TOTAL POWER
C     YRCOST       TOTAL YEARLY COST FOR THIS RUN ($)
C     YRPENT       TOTAL YEARLY PENALTY COST FOR HOT AND COLD STARTS
C     STEAM        ADJUST STEAM MACHINE PRIORITY (0=NO ADJUST, 1=ADJUST)
C
C     YRPWR        YEARLY TOTAL OF POWER GENERATED BY SYSTEM (W/O A+B)
C
C     REFER1       NUMBER OF SECONDS SINCE MIDNIGHT (REFERENCE TIME 1)
C     REFER2       NUMBER OF SECONDS SINCE MIDNIGHT (REFERENCE TIME 2)
C     KHR          CURRENT HOUR OF DAY
C     KMIN         CURRENT MINUTE OF DAY
C     KSEC         CURRENT SECOND OF DAY
C     K100TH       CURRENT 100TH OF SECOND OF DAY
C     IGNORE       IGNORED VARIABLE USED TO SKIP THIS DATA FILE LINE
C
C     MDAY         MAXIMUM NUMBER OF DAYS IN EACH MONTH
C
C     JANUARY 1, 1995 => SUNDAY
C
C***********************************************************************
C
      IMPLICIT NONE
      INTEGER TTY,MC,FC,OT,PBRK
```

```
      REAL RESERV,PEAK,pwrbuy
      REAL*8 FACTOR
      LOGICAL FAST,BEST,WPOWER,WMMBTU,WBBL,WCOST
C           Unit number for Terminal I/O
      PARAMETER (TTY=5)
C           Logical Flag for writing power to output (TRUE = yes)
      PARAMETER (WPOWER=.TRUE.)
C           Logical Flag for writing power to output (TRUE = yes)
      PARAMETER (WMMBTU=.TRUE.)
C           Logical Flag for writing power to output (TRUE = yes)
      PARAMETER (WBBL=.TRUE.)
C           Logical Flag for writing power to output (TRUE = yes)
      PARAMETER (WCOST=.TRUE.)
C
C           Maximum Number of Machines - Be Careful Increasing This
C           Number because FORMAT statement may need to be modified.
      PARAMETER (MC=21)
C           Maximum Number of Fuel Types
      PARAMETER (FC=9)
C           Maximum Number of Order Types
      PARAMETER (OT=12)
C           Maximum Number of Break Points in Quick Pickup Power Curve
      PARAMETER (PBRK=11)
C           Reserve Power Required (ALWAYS 157 MW for 2005)
      PARAMETER (RESERV=157.)
C           Peak Value for the Year used to adjust load
      PARAMETER (PEAK=1171)
C           Adjustment (Factor=8255.3/8247) for the Load
      PARAMETER (FACTOR=1.001006)
C
C           Logical Speed Flag (APPROXIMATELY 10 TIMES FASTER)
C                 .TRUE. = quick, calculate at MIN machine count only
C                 .FALSE.= complete analysis MIN -> MAX machine count
      PARAMETER (FAST=.TRUE.)
C
C           Logical Best Solution Flag
C                 .TRUE.  = My Best Analysis for Solution
C                 .FALSE. = Their analysis (Base Loads must run)
      PARAMETER (BEST=.FALSE.)
C
C
C           SECTION 1 DECLARATIONS
C
      CHARACTER FCODE(FC)*1
      REAL FDOLR(FC),FBTU(FC),FADJST(FC)
C
      CHARACTER MACH(MC)*2,PLANT(MC)*1,PCODE(MC)*1
      REAL MIN(MC),MAX(MC),COLD(MC),HOT(MC)
      REAL C(MC),B(MC),A(MC),DOLLAR(MC),MMBTU(MC),DOLBTU(MC) ,EFOR(MC)
      REAL LAMNA1(MC),LAMNA2(MC)
      REAL COST1(MC),COST2(MC)
      INTEGER STYHOT(MC),MINHR(MC)
      REAL MPOWER(PBRK,MC),RPOWER(PBRK,MC)
      INTEGER STRTPK(2),STOPPK(2)
C
C           Power bought for each Day and Each Hour
      REAL BUYPWR(365,24),TOTLD(365,24),AMT
```

e. Spinning Reserve

```
      INTEGER FMONT(365,24), FDAY1(365,24), FTRASH(365,24)
C           Peak Time per Day ( ,1)=start  ( ,2)=stop
        INTEGER PEAKTM(365,2), FLOAD(365,24)
      INTEGER FDAY,LDAY,FHOUR,LHOUR
C
C           Monthly Data
      REAL MTHMAX(12)
C           Total Percent Load -> 24 Hours, Each Month,
c           (1=Weekend, 2=Weekday)
      REAL PERCNT(24,2)
C
      CHARACTER COMMIT(MC,OT)*2
C
      INTEGER KNT,J,K,MTH,INDX
C
      INTEGER MONTH,DAY,HOUR,D,DOFYR,AVAIL(MC)
      INTEGER FMONTH,TMONTH,TDAY,HMONTH,HDAY
C
      REAL MINP,MAXP,PGT,SAVPGT,BACKUP
      INTEGER COMIDX(MC),MINMAC,ORDER
      REAL AI,BA,AT,BT,LAMNA
      INTEGER KOUNT,MINKNT,MAXKNT,AVAIL2(MC),FIRST,MAXSAV,KNTWS
      REAL POWER(MC),TPOWER,TPGT,FMMBTU(MC),FBBL(MC),FCOST(MC),TFCOST
      INTEGER IFLAG,JUMP
      REAL MCOST,MLAMNA
      INTEGER MKOUNT
      REAL MTHCST(MC)
      INTEGER LASTHR(MC),CSTART(MC),HSTART(MC),CSTYR(MC),HSTYR(MC)
C
      REAL QPGOT,QPNEED,MXPWR
C
      REAL DELTA,EPS,SLAMNA,SPOWER,YRCOST,YRPENT
      INTEGER STEAM
      INTEGER REFER1,REFER2,KHR,KMIN,KSEC,K100TH
      REAL IGNORE,YRPWR
C
      INTEGER MDAY(12)
      DATA MDAY/31,28,31,30,31,30,31,31,30,31,30,31/

C
      DATA MTHCST/MC*0.0/
      DATA LASTHR/MC*0/
      DATA CSTART/MC*0/
      DATA HSTART/MC*0/
      DATA CSTYR/MC*0/
      DATA HSTYR/MC*0/
      DATA YRCOST,YRPENT/0.0,0.0/
      DATA KHR,KMIN,KSEC,K100TH/4*0/
      DATA YRPWR/0.0/
C
C*********************************************************************
C           Section 1
C
C           Open Fuel Cost Input Data File
      OPEN(UNIT=2,FILE='FUEL.DAT',STATUS='OLD')
C
C           Loop Reading Fuel Information
```

```
      DO 1020 J=1,FC
1022   READ(2,200,END=1021,ERR=1022) FCODE(J),FDOLR(J),FBTU(J),
     $      FADJST(J)
200    FORMAT(A1,5X,2F8.4,9X,F5.3)
       WRITE(TTY,901) FCODE(J),FDOLR(J),FBTU(J),FADJST(J)
901    FORMAT(2X,A1,2F10.4,F8.3)
1020  CONTINUE
C           Close Fuel Data File
      CLOSE(UNIT=2)
      GO TO 1025
C           Ran out of Data -> exit
1021    WRITE(TTY,*) 'FUEL DATA INFORMATION MISSING'
      PAUSE ' PRESS RETURN TO EXIT'
      STOP
C
C           Open Machine Input Data File
1025  OPEN(UNIT=2,FILE='MACHINE8.DAT',STATUS='OLD')
C           Open Machine Summary Data File
      OPEN(UNIT=3,FILE='MACHINE.OUT',STATUS='UNKNOWN')
C
C     WRITE(TTY,*) 'MACHINE DATA SUMMARY'
      WRITE(3,*) 'MACHINE DATA SUMMARY'
C           Loop Reading Machine Information
      DO 1026 J=1,MC
       READ(2,281,END=1028) MACH(J),PLANT(J),PCODE(J),
     $        MIN(J),MAX(J),COLD(J),HOT(J),STYHOT(J),C(J),B(J),A(J),
     $        MINHR(J),EFOR(J)
       Write(TTY,281) MACH(J),PLANT(J),PCODE(J),
     $        MIN(J),MAX(J),COLD(J),HOT(J),STYHOT(J),C(J),B(J),A(J),
     $        MINHR(J) , EFOR(J)
       MAX(J)=MAX(J)*(1-EFOR(J))
       MIN(J)=MIN(J)*(1-EFOR(J))
281    FORMAT(A2,1X,A1,1X,A1,F3.0,F4.0,2F8.1,I4,3F9.7,2X,I4,2x,F6.4)
       STYHOT(J)=ABS(STYHOT(J))
       KNT=J
C
       READ(2,282) (MPOWER(K,KNT),RPOWER(K,KNT),K=1,PBRK)
282    FORMAT(2X,22F4.0)
C      WRITE(TTY,282) (MPOWER(K,KNT),RPOWER(K,KNT),K=1,PBRK)
       WRITE(3,282) (MPOWER(K,KNT),RPOWER(K,KNT),K=1,PBRK)
C
C           Search for Correct Fuel Type
       DO 1029 K=1,FC
        IF(PCODE(KNT).NE.FCODE(K)) GO TO 1029
C           Found Correct Fuel Type, Copy Data
        DOLLAR(KNT)=FDOLR(K)
        MMBTU(KNT)=FBTU(K)
C           Calculate Dollars per MMBTU
        DOLBTU(KNT)=DOLLAR(KNT)/MMBTU(KNT)
C           Calculate Minimum and Maximum Lamna
        LAMNA1(KNT)=(2.*A(KNT)*MIN(KNT)+B(KNT))*DOLBTU(KNT)
        LAMNA2(KNT)=(2.*A(KNT)*MAX(KNT)+B(KNT))*DOLBTU(KNT)
C           Calculate Fuel Cost for This Machine
        COST1(KNT)=(((A(KNT)*MIN(KNT))+B(KNT))*MIN(KNT)+
     $      C(KNT))*DOLBTU(KNT)/MIN(KNT)
        COST2(KNT)=(((A(KNT)*MAX(KNT))+B(KNT))*MAX(KNT)+
     $      C(KNT))*DOLBTU(KNT)/MAX(KNT)
```

```
C        WRITE(TTY,900) MACH(KNT),A(KNT),B(KNT),C(KNT),MIN(KNT),
C     $      MAX(KNT),COST1(KNT),COST2(KNT)
C     $      ,LAMNA1(KNT),LAMNA2(KNT),MINHR(KNT),DOLBTU(KNT)
         WRITE(3,900) MACH(KNT),A(KNT),B(KNT),C(KNT),MIN(KNT),
      $      MAX(KNT),COST1(KNT),COST2(KNT)
      $      ,LAMNA1(KNT),LAMNA2(KNT),MINHR(KNT),DOLBTU(KNT)
900      FORMAT(1X,A,F8.6,F10.6,F12.6,F6.2,F7.2,4F8.3,I5,F7.4)
C
C            Next Generator from Machine Data File
         GO TO 1026
1029    CONTINUE
C            Never Found Correct Fuel Type, Report It !
        GO TO 1021
1026   CONTINUE
C            Close Machine Data Files
1028   CLOSE(UNIT=2)
       CLOSE(UNIT=3)
C
C            Open Data File for Amount of Power Bought
       OPEN(UNIT=2,FILE='BUYPWR.DAT',STATUS='OLD')
       pwrbuy=0.0
1030   READ(2,210,END=1038) FDAY,LDAY,FHOUR,LHOUR,AMT
210    FORMAT(I3,3I4,F6.2)
C            Save Amount Bought for given Period (DAY,HOUR)
       DO 1032 J=FDAY,LDAY
        DO 1031 K=FHOUR,LHOUR
         BUYPWR(J,K)=AMT
       pwrbuy=pwrbuy+amt
1031    CONTINUE
1032   CONTINUE
C            Get Next Record of Information
       GO TO 1030
C            Close Power Bought Data File
1038   CLOSE(UNIT=2)
C
C***   WRITE(TTY,910) ((BUYPWR(1,K),K=1,24)
C***   WRITE(TTY,910) ((BUYPWR(365,K),K=1,24)
C910   FORMAT(12F6.2)
C
C            Open Holiday Date Data File
       OPEN(UNIT=3,FILE='SPECIAL.DAT',STATUS='OLD')
C            Get first Line of Data => 1st Holiday
       READ(3,317) HMONTH,HDAY
317    FORMAT(2I3)
C
C            Open Loading Data File
C
       OPEN(UNIT=2,FILE='HourL.PRN',STATUS='OLD')
         OPEN(UNIT=1,FILE='HourLL.OUT',STATUS='OLD')
            DO 1023 J=1,365
         READ(2,250,END=1045,ERR=1045) FMONT(J,k),FDAY1(J,k),FTRASH(J,k),
      $      (FLOAD(J,k),K=1,12)
       WRITE(1,251) FMONT(J,k),FDAY1(J,k),FTRASH(J,k),(FLoad(J,k),K=1,12)
C****     CAS added statements
          DO 249 k=1,12
              TOTLD(J,k)=FLoad(J,k)
249       CONTINUE
```

_ C. fixed transactions

```
C****      CAS
        READ(2,250,END=1045,ERR=1045) FMONT(J,k),FDAY1(J,k),FTRASH(J,k),
     $      (FLoad(J,k),K=1,12)
250       FORMAT(I8,I8,I8,12(I8))
      WRITE(1,251) FMONT(J,k),FDAY1(J,k),FTRASH(J,k),(FLoad(J,k),K=1,12)
C****       CAS added statements
          DO 252 k=13,24
              TOTLD(J,k)=FLoad(J,k-12)
252       CONTINUE
C****       CAS
251       FORMAT(I8,1x,I8,1x,I8,1x,12(I8,1x))
1023  CONTINUE
1045  CLOSE(UNIT=2)
      OPEN(UNIT=2,FILE='LOAD.DAT',STATUS='OLD')
C           Read Maximum Load for each of 12 Months
      READ(2,220) MTHMAX
220   FORMAT(F7.0,11F8.0)
      MTH=0
      DOFYR=0
C           Read Peak Start/Stop Times for Weekend, then Weekday
1040  READ(2,211,END=1047,ERR=1047) STRTPK(1),STOPPK(1),
     $  STRTPK(2),STOPPK(2)
211   FORMAT(I2,6X,I2,6X,I2,6X,I2)
C                Increment Month Counter, Get Percentage of Max. Load
      MTH=MTH+1
C           1=Weekend
      READ(2,220) (PERCNT(J,1),J=1,12)
      READ(2,220) (PERCNT(J,1),J=13,24)
C           2=Weekday
      READ(2,220) (PERCNT(J,2),J=1,12)
      READ(2,220) (PERCNT(J,2),J=13,24)
C
C           Convert Percentages to Actual Load Required
C           1=Weekend,   2=Weekday
C           Each Month for 24 Hours
      DO 1042 D=1,MDAY(MTH)
C           Calculate Day-of-the-Week
        DOFYR=DOFYR+1
C           Assume WeekEnd (REMAINDER = 0,1)
        INDX=1
C           Adjust if Weekday (REMAINDER = 2,3,4,5,6)
        IF(MOD(DOFYR,7) .GT.1) INDX=2
C           Now Check for Special Dates -> Holidays
        IF(MTH.EQ.HMONTH .AND. D.EQ.HDAY) THEN
         INDX=1
         READ(3,317,END=1041) HMONTH,HDAY
         WRITE(TTY,*) 'NEXT HOLIDAY IS: ',HMONTH,HDAY
        ENDIF

C************ Lines from here to label 1041 commented  **************
C****         5/17/2005 - Original section calculated load into TOTLD
C****         HOURL.PRN containsload readings to be loaded directly
C****         into the TOTLD array
C*********************************************************************
C
C1043  DO 1041 J=1,24
C       TOTLD(DOFYR,J)=PERCNT(J,INDX)*MTHMAX(MTH)
```

```
C           Adjust Load Curve if FACTOR not 1.00
C       TOTLD(DOFYR,J)=PEAK*(1.-(1.-TOTLD(DOFYR,J)/PEAK)*FACTOR)
1041   CONTINUE
C*****   END OF COMMENTED LINES 5/17/2005  **************************
C           Save Peak Times for this day ( ,1)=START  ( ,2)=STOP
       PEAKTM(DOFYR,1)=STRTPK(INDX)
       PEAKTM(DOFYR,2)=STOPPK(INDX)
C
1042  CONTINUE
      GO TO 1040
C
1047  CLOSE(UNIT=2)
      CLOSE(UNIT=3)
C           Write out First and Last Day of Year
C********  CAS ADDED FILE 9 TOTLD.OUT TO TEST NEW ROUTINE
        OPEN (UNIT=9,FILE='TOTLD.OUT',STATUS='OLD')
        DO 921 J=1,365
          WRITE (9,922) (TOTLD(J,K),K=1,24)
922         FORMAT (24(F8.0,1X))
921     CONTINUE
        CLOSE(UNIT=9)
c
C***  WRITE(TTY,920) (TOTLD(1,J),J=1,24)
C***  WRITE(TTY,920) (TOTLD(365,J),J=1,24)
920   FORMAT(8F10.2)
C
C
      OPEN(UNIT=2,FILE='ORDER.DAT',STATUS='OLD')
      DO 1046 J=1,OT
       READ(2,202) (COMMIT(K,J),K=1,KNT)
202    FORMAT(2X,21(1X,A2))
1046  CONTINUE
      CLOSE(UNIT=2)
C
C
C           Save # of Seconds Since Midnight
       CALL GETTIM(KHR,KMIN,KSEC,K100TH)
       REFER1=KHR*3600+KMIN*60+KSEC
C*********************************************************************
C           Section 2
C
C           Output file for Hourly Machine Power Usage
       IF(WPOWER) OPEN(UNIT=1,FILE='POWER.OUT',STATUS='UNKNOWN')
C           Open Monthly/Daily/Hourly Available Machine File (READONLY)
       OPEN(UNIT=2,FILE='AVAIL.DAT',STATUS='OLD')
C           Open Machine Commitment Order Data File (READONLY)
       OPEN(UNIT=3,FILE='COMMIT.DAT',STATUS='OLD')
C           Open ERROR Data File PLUS Summary Information
       OPEN(UNIT=4,FILE='ERROR.OUT',STATUS='UNKNOWN')
C           Output file for Hourly Machine MMBTU Usage
       IF(WMMBTU) OPEN(UNIT=6,FILE='MMBTU.OUT',STATUS='UNKNOWN')
C           Output file for Hourly Machine BBL Usage
       IF(WBBL) OPEN(UNIT=7,FILE='BBLS.OUT',STATUS='UNKNOWN')
C           Output file for Hourly Machine COST Usage
       IF(WCOST) OPEN(UNIT=8,FILE='COST.OUT',STATUS='UNKNOWN')
C
C           Set From and To Months = 0 for start up
```

– b. unit commitment

```
      FMONTH=0
      TMONTH=0
C           Set Current Day Number in Year
      DOFYR=0
C           Steam Unit Order is OK
      STEAM=0
C
C           Read Month, Day, Hour,
C           Available units in B2,B1,A2,A1... order
C           Ignore Available Machines Count
19    READ(2,201,END=9998) MONTH,DAY,HOUR,(AVAIL(J),J=1,KNT)
201   FORMAT(1X,3I3,21I3)
C
C      WRITE(TTY,201) MONTH,DAY,HOUR,(AVAIL(J),J=1,KNT)

C           Update Day Counter for a New Day
      IF(HOUR.EQ.1) THEN
       DOFYR=DOFYR+1
C
C           Middle of Year, Switch "A" Fuel Cost to (Fuel Type = 2)
       IF(MONTH.EQ.7 .AND. DAY.EQ.1) THEN
        DO 3000 J=1,MC
         IF(PCODE(J).NE.'A') GO TO 3000
C           Found Correct Fuel Type, Copy Data as Last Fuel Type (FC)
         DOLLAR(J)=FDOLR(FC)
         MMBTU(J)=FBTU(FC)
C           Calculate Dollars per MMBTU
         DOLBTU(J)=DOLLAR(J)/MMBTU(J)
C           Calculate Minimum and Maximum Lamna
         LAMNA1(J)=(2.*A(J)*MIN(J)+B(J))*DOLBTU(J)
         LAMNA2(J)=(2.*A(J)*MAX(J)+B(J))*DOLBTU(J)
C           Calculate Fuel Cost for This Machine
         COST1(J)=(((A(J)*MIN(J))+B(J))*MIN(J)+
     $       C(J))*DOLBTU(J)/MIN(J)
         COST2(J)=(((A(J)*MAX(J))+B(J))*MAX(J)+
     $       C(J))*DOLBTU(J)/MAX(J)
3000     CONTINUE
       ENDIF
      ENDIF
C
C           Zero MINHR for Machines 16 and above (PCODE=W,H,V)
C           when hour exceeds peak time for the day
      IF((HOUR-1).EQ.PEAKTM(DOFYR,2)) THEN
       DO 3001 J=16,MC
        MINHR(J)=0
3001   CONTINUE
      ENDIF
C
C           Calculate MINHR for Machines 16 and above (PCODE=W,H,V)
C           when hour begins peak time range for the day
      IF(HOUR.EQ.PEAKTM(DOFYR,1)) THEN
       DO 3002 J=16,MC
        IF(LASTHR(J).GT.0) MINHR(J)=PEAKTM(DOFYR,2)-HOUR+1
3002   CONTINUE
      ENDIF
C
C           Set starting Month HERE !!!
```

```
C***  IF(MONTH.LT.1) GO TO 19
C
C***  WRITE(TTY,*) 'READ ',MONTH,DAY,HOUR
C***  WRITE(4,*) 'READ ',MONTH,DAY,HOUR
C
C           First of the Month, Zero Monthly Totals
      IF(DAY.EQ.1 .AND. HOUR.EQ.1) THEN
        IF(MONTH.NE.1) THEN
C           Monthly Fuel Cost per Machine
          WRITE(4,*)
          WRITE(4,*) ' MONTH NUMBER ',MONTH-1
          WRITE(4,*) 'MONTHLY POWER COST PER MACHINE'
          WRITE(4,603) (MTHCST(J),J=1,KNT)
          WRITE(4,*) 'COLD STARTS'
          WRITE(4,602) (CSTART(J),J=1,KNT)
          WRITE(4,*) 'HOT STARTS'
          WRITE(4,602) (HSTART(J),J=1,KNT)
C
602       FORMAT(12I4)
603       FORMAT(8F10.1)
C
C         WRITE(TTY,*)
C         WRITE(TTY,*) ' MONTH NUMBER ',MONTH-1
C         WRITE(TTY,*) 'MONTHLY POWER COST PER MACHINE'
C         WRITE(TTY,603) (MTHCST(J),J=1,KNT)
C         WRITE(TTY,*) 'COLD STARTS'
C         WRITE(TTY,602) (CSTART(J),J=1,KNT)
C         WRITE(TTY,*) 'HOT STARTS'
C         WRITE(TTY,602) (HSTART(J),J=1,KNT)
C
        ELSE
          WRITE(4,*) 'WORKING ...'
C         WRITE(TTY,*) 'WORKING ...'
        ENDIF
C
C           Zero Monthly Cost per Machine after Adding to Total
        DO 18 J=1,KNT
          YRCOST=YRCOST+MTHCST(J)
          YRPENT=YRPENT+(CSTART(J)*COLD(J)+HSTART(J)*HOT(J))*DOLBTU(J)
          MTHCST(J)=0.0
C           Zero number of HOT and COLD Starts for each Machine
          HSTART(J)=0
          CSTART(J)=0
C           Do not Adjust "LASTHR" variable !!
18      CONTINUE
C
C           Report Total Cost to Date
        WRITE(4,*)
        WRITE(4,*) 'Total Operational Cost to Date = $',YRCOST
        WRITE(4,*) '  Excluding HOT and COLD Start Costs'
        WRITE(4,*)
        WRITE(4,*) '  HOT and COLD Start Costs to Date = $',YRPENT
        WRITE(4,*)
        WRITE(4,*) 'Total Operational Cost to Date = $',YRCOST+YRPENT
        WRITE(4,*)
C
C       WRITE(TTY,*)
```

```
C       WRITE(TTY,*) 'Total Operational Cost to Date = $',YRCOST
C       WRITE(TTY,*) '  Excluding HOT and COLD Start Costs'
C       WRITE(TTY,*)
C       WRITE(TTY,*) '  HOT and COLD Start Costs to Date = $',YRPENT
C       WRITE(TTY,*)
C       WRITE(TTY,*) 'Total Operational Cost to Date = $',
C     $    YRCOST+YRPENT
C       WRITE(TTY,*)
C
      ENDIF
C
C           Set of IF statements for Debugging -> STOP Program
C           Set Ending Month, Day, or Hour HERE !!!
C***  IF(MONTH.EQ.2) GO TO 9998
C***  IF(DAY.EQ.2) GO TO 9998
C***  IF(HOUR.EQ.5) GO TO 9998
C
C           Check to see if MONTH between From Month and To Month
20    IF(MONTH.LT.FMONTH .OR. MONTH.GT.TMONTH) GO TO 21
C           Check to see if DAY between From Day and To Day
      IF(DAY.LT.FDAY .OR. DAY.GT.TDAY) GO TO 21
C           Range is OK, continue with analysis
      GO TO 22
C
C           Read From Month,From Day, To Month, To Day,
C           Base Load, Minimum Steam Units(Y or C) code,
C           Commitment Order
21    READ(3,301,END=9998) FMONTH,FDAY,TMONTH,TDAY,MINMAC,ORDER
301   FORMAT(1X,6I3)
C           Determine Indices from Commitment Order
      CALL SORT1(MC,KNT,COMMIT(1,ORDER),MACH,PCODE,LASTHR,MINHR,
     $ COMIDX,AVAIL,FIRST,BEST)
C
C***  WRITE(TTY,*) 'INDEX ORDER ',FMONTH,FDAY,(COMIDX(J),J=1,KNT)
C***  WRITE(4,*) 'INDEX ORDER ',FMONTH,FDAY,(COMIDX(J),J=1,KNT)
      GO TO 20
C
C           ADJUST INDX ORDERED LIST IF NECESSARY
C
22    IF(STEAM.EQ.1) THEN
C           Calculate Indices from Commitment Order (necessary adjustment)
C           Steam Machine added or removed from service
        CALL SORT1(MC,KNT,COMMIT(1,ORDER),MACH,PCODE,LASTHR,MINHR,
     $   COMIDX,AVAIL,FIRST,BEST)
C
C***    WRITE(TTY,*) 'SORT ADJUSTED because of Steam Machines'
C***    WRITE(TTY,*) COMIDX
C***    WRITE(TTY,*)
C***    WRITE(4,*) 'SORT ADJUSTED because of Steam Machines'
C***    WRITE(4,*) COMIDX
C***    WRITE(4,*)
      ENDIF
C
C           Calculate Power to Generate & Save It
      SAVPGT=(TOTLD(DOFYR,HOUR))* Factor - BUYPWR(DOFYR,HOUR)
C***  WRITE(TTY,*) 'POWER TO GENERATE ',SAVPGT
C***  WRITE(4,*) 'POWER TO GENERATE ',SAVPGT
```

```
C
C           Find Minimum and Maximum Machines from Ordered List for
C           This Power Rate plus must have 2 "W" Machines Running
        MINP=0
        MAXP=0
        KNTWS=0
C           Find Minimum Number of Machines
        DO 24 MINKNT=1,KNT
          INDX=COMIDX(MINKNT)
          IF(AVAIL(INDX).NE.1) GO TO 24
          MAXP=MAXP+MAX(INDX)
C           Count the Number of "W" Machines [ 1st letter is W ]
          IF(MACH(INDX)(1:1) .EQ. 'W') KNTWS=KNTWS+1
C           Reached Required Power plus at least 2 "W" Machines
          IF(MAXP.GT.SAVPGT .AND. KNTWS.GE.2) GO TO 26
          MINP=MINP+MIN(INDX)
24      CONTINUE
        STOP 2
C           Find Maximum Number of Machines
26      DO 25 MAXKNT=MINKNT,KNT
          INDX=COMIDX(MAXKNT)
          IF(AVAIL(INDX).NE.1) GO TO 25
          MINP=MINP+MIN(INDX)
          IF(MINP.GT.SAVPGT) GO TO 27
25      CONTINUE
27      MAXKNT=MAXKNT-1
        MAXSAV=MAXKNT
C
C***  WRITE(TTY,*) 'MACHINE RANGE = ',MINKNT,MAXKNT,' ON ',MONTH,'/',
C***     $  DAY,' AT ',HOUR
C***  WRITE(4,*) 'MACHINE RANGE = ',MINKNT,MAXKNT,' ON ',MONTH,'/',
C***     $  DAY,' AT ',HOUR
C
C           Modify Range if Machine Must be Left ON
70    IF(MINKNT.LT.MAXKNT) THEN
        DO 72 J=MINKNT+1,MAXKNT
          INDX=COMIDX(J)
C           Skip Diesel Machines
           IF(PCODE(INDX).EQ.'D') GO TO 72
            IF(LASTHR(INDX).GT.0 .AND.
     $       LASTHR(INDX).LT.MINHR(INDX)) THEN
              MINKNT=J
C***          WRITE(TTY,*) 'ADJUSTED RANGE ON = ',MONTH,DAY,HOUR,
C***     $      ' TO ',MINKNT,MAXKNT,INDX
C***          WRITE(4,*) 'ADJUSTED RANGE ON = ',MONTH,DAY,HOUR,
C***     $      ' TO ',MINKNT,MAXKNT,INDX
            ENDIF
72      CONTINUE
      ENDIF
C
C           Modify Minimum Number of Machines that Must RUN
        IF(MINKNT.LT.FIRST) MINKNT=FIRST
C
C           Begin Loop looking for Lowest Cost Operation
C           (( For short CUT Method,  SET DO LOOP from MIN to MIN ))
C           (( For best results,  use MIN to MAX ))
71    IF(FAST) MAXKNT=MINKNT
```

```
C
      DO 50 KOUNT=MINKNT,MAXKNT
C
      LAMNA=25.
      DELTA=1.0
      EPS=0.005
      JUMP=0
C
85    JUMP=JUMP+1
C           Set Maximum of 75 Iterations before quitting search (if needed)
      IF(JUMP.GT.75) GO TO 89
C
      TPOWER=0
C           Calculate Power for Each Available Unit & Total Them
      DO 81 J=1,KOUNT
        INDX=COMIDX(J)
C           Must be 1 to be included in this calculation, else skip it
        IF(AVAIL(INDX).NE.1) GO TO 81
C
        POWER(INDX)=((LAMNA-B(INDX)*DOLBTU(INDX))/
     $                  (2.*A(INDX)*DOLBTU(INDX)))
C           Check for Maximum Power Value
        IF(POWER(INDX).GT.MAX(INDX)) THEN
          POWER(INDX)=MAX(INDX)
        ENDIF
C           Check for Minimum Incremental Power Value
        IF(POWER(INDX).LT.MIN(INDX)) THEN
          POWER(INDX)=MIN(INDX)
        ENDIF
C           Total Variable Power
        TPOWER=TPOWER+POWER(INDX)
81    CONTINUE
C
      IF(ABS(TPOWER-SAVPGT).LT.EPS) GO TO 89
      IF(TPOWER.GT.SAVPGT) THEN
        LAMNA=LAMNA-DELTA
      ELSE
        LAMNA=LAMNA+DELTA
      ENDIF
C
      IF(JUMP.EQ.1) THEN
C           Save 1st Point in search
        SPOWER=TPOWER
C           Check for passed answer (bounded)
      ELSE IF((SPOWER-SAVPGT)*(TPOWER-SAVPGT).LT.0) THEN
C           Trapped it, sub-divide step size for lamna
        DELTA=DELTA/10.
C           Which side on answer am I ?
        IF(TPOWER.GT.SAVPGT) THEN
C           I just passed it from the left, old value + small step
          LAMNA=LAMNA+DELTA
        ELSE
C           I just passed it from the right, old value - small step
          LAMNA=LAMNA-DELTA
        ENDIF
      ENDIF
C
```

- a. Economic dispatch

```
      GO TO 85
C
C           Reset Calculated Power Generated
89    PGT=SAVPGT
      SLAMNA=LAMNA
C***  WRITE(TTY,*) 'JUMP VALUE, LAMNA = ',JUMP,LAMNA
      JUMP=0
C
C           If doing Fast Calculations, don't refine LAMNA any further
      IF(FAST) GO TO 41
C
C
C           Copy available array to AVAIL2 array
      DO 29 J=1,KOUNT
        INDX=COMIDX(J)
        AVAIL2(INDX)=AVAIL(INDX)
        IF(AVAIL(INDX).EQ.0) GO TO 29
        POWER(INDX)=((LAMNA-B(INDX)*DOLBTU(INDX))/
     $                  (2.*A(INDX)*DOLBTU(INDX)))
C           Check for Maximum Power Value
        IF(POWER(INDX).GT.MAX(INDX)) THEN
          POWER(INDX)=MAX(INDX)
          AVAIL2(INDX)=-1
          PGT=PGT-MAX(INDX)
        ENDIF
C           Check for Maximum Power Value
        IF(POWER(INDX).LT.MIN(INDX)) THEN
          POWER(INDX)=MIN(INDX)
          AVAIL2(INDX)=0
          PGT=PGT-MIN(INDX)
        ENDIF
29    CONTINUE
C           Work with Total Generated Power
      TPGT=PGT
C
C           Calculate Lamna ($/KWHR) for Specified Available Machines
32    AI=0
      BA=0
C           Loop for all machines available (1=AVAILABLE)
      DO 30 J=1,KOUNT
        INDX=COMIDX(J)
        IF(AVAIL2(INDX).NE.1) GO TO 30
        AI=AI+0.5/(A(INDX)*DOLBTU(INDX))
        BA=BA+B(INDX)/(2.*A(INDX))
30    CONTINUE
C
      IF(AI.EQ.0.0) GO TO 41
      AT=1.0/AI
      BT=AT*BA
C
      IF(ABS(LAMNA-(AT*TPGT+BT)).LT. 16.) THEN
        LAMNA=AT*TPGT+BT
      ELSE
C       WRITE(TTY,*) MONTH,DAY,HOUR,SAVPGT
C       WRITE(TTY,*) AVAIL
C       WRITE(TTY,*) '*** LAMNA ERROR ***',LAMNA,AT*TPGT+BT,TPGT,
C    $   KOUNT,AT,BT
```

```
C       WRITE(TTY,*) (AVAIL2(COMIDX(J)),J=1,KOUNT)
C       WRITE(TTY,603) (POWER(COMIDX(J)),J=1,KOUNT)
C       WRITE(4,*) MONTH,DAY,HOUR,SAVPGT
C       WRITE(4,*) AVAIL
C       WRITE(4,*) '*** LAMNA ERROR ***',LAMNA,AT*TPGT+BT,TPGT,
C     $   KOUNT,AT,BT
C       WRITE(4,*) (AVAIL2(COMIDX(J)),J=1,KOUNT)
C       WRITE(4,603) (POWER(COMIDX(J)),J=1,KOUNT)
C
        LAMNA=SLAMNA
        GO TO 41
      ENDIF
C
C           2nd Iteration Counter
      JUMP=JUMP+1
C***  WRITE(TTY,*) 'LAMNA= ',LAMNA,JUMP
C***  WRITE(4,*) 'LAMNA= ',LAMNA,JUMP
      IF(JUMP.GT.10) GO TO 49
C
      IFLAG=0
      TPOWER=0
C           Calculate Power for Each Available Unit & Total Them
      DO 31 J=1,KOUNT
        INDX=COMIDX(J)
        POWER(INDX)=0.0
C           Must be 1 to be included in this calculation, else skip it
        IF(AVAIL(INDX).NE.1) GO TO 31
C
        POWER(INDX)=(LAMNA-B(INDX)*DOLBTU(INDX))/
     $                    (2.*A(INDX)*DOLBTU(INDX))
C***    WRITE(TTY,399) INDX,MACH(INDX),POWER(INDX),LAMNA1(INDX),
C*** $  LAMNA2(INDX)
C***    WRITE(4,399) INDX,MACH(INDX),POWER(INDX),LAMNA1(INDX),
C*** $  LAMNA2(INDX)
C           Check for Maximum Incremental Power Value
        IF(LAMNA.GT.LAMNA2(INDX)) THEN
          POWER(INDX)=MAX(INDX)
          IF(AVAIL2(INDX).NE.1) GO TO 33
          TPGT=TPGT-MAX(INDX)
          AVAIL2(INDX)=-1
          IFLAG=1
          GO TO 33
        ENDIF
C           Check for Minimum Incremental Power Value
        IF(LAMNA.LT.LAMNA1(INDX)) THEN
          POWER(INDX)=MIN(INDX)
          IF(AVAIL2(INDX).NE.1) GO TO 33
          TPGT=TPGT-MIN(INDX)
          AVAIL2(INDX)=0
          IFLAG=1
          GO TO 33
        ENDIF
C
        IF(AVAIL2(INDX).EQ.1) GO TO 33
C           Available =1
        IFLAG=1
        IF(AVAIL2(INDX).EQ.0) THEN
```

```
C           Reset available for calculations, was 0=Minimum
          AVAIL2(INDX)=1
          TPGT=TPGT+MIN(INDX)
        ELSE
C           Reset available for calculations, was -1=Maximum
          AVAIL2(INDX)=1
          TPGT=TPGT+MAX(INDX)
        ENDIF
C           Total Variable Power
33      POWER(INDX)=POWER(INDX)*(1-EFOR(INDX))
        TPOWER=TPOWER+POWER(INDX)
```

– d. EFOR

```
C***    WRITE(TTY,399) INDX,MACH(INDX),POWER(INDX),LAMNA1(INDX),
C***     $  LAMNA2(INDX),AVAIL2(INDX),TPGT
C***    WRITE(4,399) INDX,MACH(INDX),POWER(INDX),LAMNA1(INDX),
C***     $  LAMNA2(INDX),AVAIL2(INDX),TPGT
399   FORMAT(1X,I3,4X,A,2X,F9.2,2F7.3,3X,I3,F7.2)
31    CONTINUE
C           Flag set, recalculate lamna
      IF(IFLAG.NE.0) GO TO 32
C
C           Calculate Fuel Cost for Each Machine & Total for this Hour
41    TFCOST=0
      DO 40 J=1,KOUNT
        INDX=COMIDX(J)
        IF(AVAIL(INDX).EQ.0) GO TO 40
        FCOST(INDX)=(((A(INDX)*POWER(INDX))+
     $    B(INDX))*POWER(INDX)+C(INDX))*DOLBTU(INDX)
        TFCOST=TFCOST+FCOST(INDX)
40    CONTINUE
C
C***  WRITE(TTY,500) MONTH,DAY,HOUR,KOUNT,LAMNA,TPOWER,SAVPGT,IFLAG,
C***     $ TFCOST,(MACH(COMIDX(J)),POWER(COMIDX(J)),J=1,KOUNT)
C***  WRITE(4,500) MONTH,DAY,HOUR,KOUNT,LAMNA,TPOWER,SAVPGT,IFLAG,
C***     $ TFCOST,(MACH(COMIDX(J)),POWER(COMIDX(J)),J=1,KOUNT)
500   FORMAT(1X,4I3,F8.4,2F7.2,I2,'  $',F8.2,/,
     $ 7(2X,A,F6.2),/,7(2X,A,F6.2),/,7(2X,A,F6.2))
C
C           1st Time for This Hour, Save Data
      IF(KOUNT.EQ.MINKNT) THEN
        MKOUNT=KOUNT
        MLAMNA=LAMNA
        MCOST=TFCOST
C           If less Fuel Cost after 1st Time, then Save Data
      ELSE IF(TFCOST.LT.MCOST) THEN
        MKOUNT=KOUNT
        MLAMNA=LAMNA
        MCOST=TFCOST
      ENDIF
C
C           Reset Total Power Generated
49    PGT=SAVPGT
      TPGT=PGT
C
50    CONTINUE
C
C           Set NO adjust for steam Machines
```

```
      STEAM=0
C
C           Recalculate Power used by Each Machine
      DO 60 J=1,KNT
        INDX=COMIDX(J)
        POWER(INDX)=(MLAMNA-B(INDX)*DOLBTU(INDX))/
     $                  (2.*A(INDX)*DOLBTU(INDX))
C           Must be atleast MIN Power
        IF(POWER(INDX).LT.MIN(INDX)) POWER(INDX)=MIN(INDX)
C           Must be atmost MAX Power
        IF(POWER(INDX).GT.MAX(INDX)) POWER(INDX)=MAX(INDX)
C           Machine Not Available ->  Zero POWER
        IF(AVAIL(INDX).EQ.0) POWER(INDX)=0.0
C           Machine Not in Solution List ->  Zero POWER
        IF(J.GT.MKOUNT) POWER(INDX)=0.0
60    CONTINUE
C
C           Quick Pick-up Power in Reserve Calculated
      MXPWR=0.
      QPGOT=0.
      DO 65 J=1,KNT
       INDX=COMIDX(J)
C***   WRITE(TTY,*) J,INDX,POWER(INDX)
       IF(POWER(INDX).EQ.0) GO TO 65
       IF(POWER(INDX).GT.MXPWR) MXPWR=POWER(INDX)
       DO 66 K=2,PBRK
C***    WRITE(TTY,*) K,MPOWER(K,INDX),'RES ',RPOWER(K,INDX),
C***     $  RPOWER(K-1,INDX)
        IF(POWER(INDX).LE.MPOWER(K,INDX)) THEN
         QPGOT=QPGOT + RPOWER(K-1,INDX) +
     $          (RPOWER(K,INDX)-RPOWER(K-1,INDX)) *
     $          (POWER(INDX)-MPOWER(K-1,INDX)) /
     $          (MPOWER(K,INDX)-MPOWER(K-1,INDX))
C***        WRITE(TTY,*) INDX,QPGOT,MPOWER(K,INDX),MPOWER(K-1,INDX)
         GO TO 65
        ENDIF
66     CONTINUE
65    CONTINUE
C
C           Needed Power = 0.95*SAVPGT - (SAVPGT-MXPWR)
      QPNEED=MXPWR-0.05*SAVPGT
C***    WRITE(TTY,*) 'QUICK POWER GOT, NEEDED = ',QPGOT,QPNEED
C
C           Report ERROR, if not enough reserve power off line
      IF(QPGOT.LT.QPNEED) THEN
       IF(MINKNT.LT.MAXSAV) THEN
        MINKNT=MINKNT+1
        IF(FAST) MAXKNT=MINKNT
        GO TO 71
       ENDIF
C           Can't increase Machine Count, Report Error !
C       WRITE(TTY,*) '*** QUICK POWER GOT, NEEDED = ',QPGOT,QPNEED
C       WRITE(4,*) '*** QUICK POWER GOT, NEEDED = ',QPGOT,QPNEED
      ENDIF
C
C           Total Off-Line Reserve
      BACKUP=0.0
```

```
      DO 23 J=1,KNT
       INDX=COMIDX(J)
C           Must be available !
       IF(AVAIL(INDX).EQ.1) THEN
C           Running at Partial Power
        IF(POWER(INDX).NE.0.) THEN
         BACKUP=BACKUP+(MAX(INDX)-POWER(INDX))
        ELSE
C           Not Running, check for type of Machine (G ONLY)
         IF(PCODE(INDX).EQ.'D') THEN
C           Machine can cycle, Count it in Reserve
          BACKUP=BACKUP+MAX(INDX)
         ENDIF
        ENDIF
       ENDIF
23    CONTINUE
C           Report ERROR, if not enough reserve power off line
      IF(BACKUP.LT.RESERV) THEN
       IF(MINKNT.LT.MAXSAV) THEN
        MINKNT=MINKNT+1
        IF(FAST) MAXKNT=MINKNT
        GO TO 71
       ENDIF
C           Can't increase Machine Count, Report Error !
C       WRITE(TTY,*) '*** POWER,NEEDED,PERCENT= ',
C     $ SAVPGT,BACKUP,BACKUP/SAVPGT*100.0,'%'
        WRITE(4,*) '*** POWER,NEEDED,PERCENT= ',
      $ SAVPGT,BACKUP,BACKUP/SAVPGT*100.0,'%'
      ENDIF
C
C           Met Reserve Requirements, Continue Calculations per Machine
      DO 61 J=1,KNT
        INDX=COMIDX(J)
C           Calculate MMBTU required for This Machine
        FMMBTU(INDX)=(((A(INDX)*POWER(INDX))+
      $    B(INDX))*POWER(INDX)+C(INDX))
C           Machine Not Available ->  Zero POWER = Zero MMBTUs
        IF(AVAIL(INDX).EQ.0) FMMBTU(INDX)=0.0
C           Machine Not in Solution List ->  Zero MMBTUs required
        IF(J.GT.MKOUNT) FMMBTU(INDX)=0.0
C           Calculate Barrels of Fuel Required for this Machine
        FBBL(INDX)=FMMBTU(INDX)/MMBTU(INDX)
C           Calculate Fuel Cost for This Machine
        FCOST(INDX)=FBBL(INDX)*DOLLAR(INDX)
C
        MTHCST(INDX)=MTHCST(INDX)+FCOST(INDX)
C
C           FOR "A" AND "B" CODES ONLY, SKIP !!
        IF(PCODE(INDX).EQ.'A' .OR. PCODE(INDX).EQ.'B') GO TO 61
C
C           Check for OFF last time
        IF(LASTHR(INDX).LE.0) THEN
          IF(POWER(INDX).EQ.0.0) THEN
C           OFF and still OFF
            LASTHR(INDX)=LASTHR(INDX)-1
          ELSE
C           OFF and now ON  -> cold start
```

```
            IF((-LASTHR(INDX)).LE.STYHOT(INDX)) THEN
C           HOT start counted
              HSTART(INDX)=HSTART(INDX)+1
              HSTYR(INDX)=HSTYR(INDX)+1
            ELSE
C           COLD start counted
              CSTART(INDX)=CSTART(INDX)+1
              CSTYR(INDX)=CSTYR(INDX)+1
            ENDIF
            LASTHR(INDX)=1
C           Must Adjust priority List for Steam Machines
            STEAM=1
C
C           For Machines>14, calculate MINHR time until peak ends
            IF(INDX.GT.14 .AND. HOUR.GE.PEAKTM(DOFYR,1)) THEN
             MINHR(INDX)=PEAKTM(DOFYR,2)-HOUR+1
            ENDIF
          END IF
C
        ELSE
C           Machine was ON last hour (BEFORE)
          IF(POWER(INDX).NE.0.0) THEN
            LASTHR(INDX)=LASTHR(INDX)+1
          ELSE
C           Machine was ON and now OFF
            IF(LASTHR(INDX).LT.MINHR(INDX)) THEN
C            WRITE(TTY,400) MONTH,DAY,HOUR,MACH(INDX),LASTHR(INDX)
             WRITE(4,400) MONTH,DAY,HOUR,MACH(INDX),LASTHR(INDX)
400          FORMAT(1X,'*** WARNING *** ',I2,'/',I2,I4,3X,A,
     $         ' was ON only ',I4,' hours')
             IF(AVAIL(INDX).EQ.0) THEN
C             WRITE(TTY,*) '    Machine taken OFF LINE'
              WRITE(4,*) '    Machine taken OFF LINE'
             ENDIF
            ENDIF
C           It is now OFF for 1 hour
            LASTHR(INDX)=-1
C           Must Adjust priority List for Steam Machines
            STEAM=1
          ENDIF
        ENDIF
61    CONTINUE
C
C           Completed 1 Hour, Write data To Data File
C***  WRITE(4,600) MONTH,DAY,HOUR,SAVPGT,MCOST,MLAMNA,MKOUNT
C***  WRITE(TTY,600) MONTH,DAY,HOUR,SAVPGT,MCOST,MLAMNA,MKOUNT
600   FORMAT(3I3,F10.4,'  $',F8.2,F9.4,I3)

C           Pick Output Type:  ->  DataBase (HOURLY.OUT)
C           Power, MMBTU required, Barrels of Fuel, or Fuel Cost
      IF(WPOWER) WRITE(1,601) (POWER(J),J=1,KNT)
      IF(WMMBTU) WRITE(6,604) (FMMBTU(J),J=1,KNT)
      IF(WBBL) WRITE(7,606) (FBBL(J),J=1,KNT)
      IF(WCOST) WRITE(8,613) (FCOST(J),J=1,KNT)
C
C           Pick Output Type:  ->  ERROR.OUT
C           Power, MMBTU required, Barrels of Fuel, or Fuel Cost
```

```
C***  WRITE(4,603) (POWER(J),J=1,KNT)
C***  WRITE(4,607) (FMMBTU(J),J=1,KNT)
C***  WRITE(4,608) (FBBL(J),J=1,KNT)
C***  WRITE(4,607) (FCOST(J),J=1,KNT)
C
C           Pick Output Type:  ->  Screen
C           Power, MMBTU required, Barrels of Fuel, or Fuel Cost
C***  WRITE(TTY,603) (POWER(J),J=1,KNT)
C***  WRITE(TTY,607) (FMMBTU(J),J=1,KNT)
C***  WRITE(TTY,608) (FBBL(J),J=1,KNT)
C***  WRITE(TTY,607) (FCOST(J),J=1,KNT)
C
601   FORMAT(24F7.2)
604   FORMAT(24F9.2)
606   FORMAT(24F9.3)
607   FORMAT(7F10.2)
608   FORMAT(7F10.3)
613   FORMAT(24F7.0)
C
C           Add power generated by machines excluding (B2,B1,A2,A1)
      DO 82 J=5,MC
       YRPWR=YRPWR+POWER(J)
82    CONTINUE
C
      GO TO 19
C
C           Finished the year, print December's Totals
C           Monthly Fuel Cost per Machine
9998  WRITE(4,*)
      WRITE(4,*) ' MONTH NUMBER ',MONTH
      WRITE(4,*) 'MONTHLY POWER COST PER MACHINE'
      WRITE(4,603) (MTHCST(J),J=1,KNT)
      WRITE(4,*) 'COLD STARTS'
      WRITE(4,602) (CSTART(J),J=1,KNT)
      WRITE(4,*) 'HOT STARTS'
      WRITE(4,602) (HSTART(J),J=1,KNT)
C
      WRITE(4,*)
      WRITE(4,*) 'COLD STARTS FOR YEAR'
      WRITE(4,602) (CSTYR(J),J=1,KNT)
      WRITE(4,*) 'HOT STARTS FOR YEAR'
      WRITE(4,602) (HSTYR(J),J=1,KNT)
C
C     WRITE(TTY,*)
C     WRITE(TTY,*) ' MONTH NUMBER ',MONTH
C     WRITE(4,*) 'MONTHLY POWER COST PER MACHINE'
C     WRITE(TTY,603) (MTHCST(J),J=1,KNT)
C     WRITE(TTY,*) 'COLD STARTS'
C     WRITE(TTY,602) (CSTART(J),J=1,KNT)
C     WRITE(TTY,*) 'HOT STARTS'
C     WRITE(TTY,602) (HSTART(J),J=1,KNT)
C
C     WRITE(TTY,*)
C     WRITE(TTY,*) 'COLD STARTS FOR YEAR'
C     WRITE(TTY,602) (CSTYR(J),J=1,KNT)
C     WRITE(TTY,*) 'HOT STARTS FOR YEAR'
C     WRITE(TTY,602) (HSTYR(J),J=1,KNT)
```

```
C
C           Add December's Monthly Total to Running Total
      DO 80 J=1,KNT
        YRCOST=YRCOST+MTHCST(J)
        YRPENT=YRPENT+(CSTART(J)*COLD(J)+HSTART(J)*HOT(J))*DOLBTU(J)
80    CONTINUE
C
C           Done, Report, Clean-up, and Exit
9999  CONTINUE
C
C           Get Wall Clock seconds since Midnight
      CALL GETTIM(KHR,KMIN,KSEC,K100TH)
      REFER2=KHR*3600+KMIN*60+KSEC
C
      WRITE(4,*)
      WRITE(4,605) 'Program took ',(REFER2-REFER1)/60.,' minutes'
605   FORMAT(1X,A,F10.2,A)
      WRITE(4,*)
      WRITE(4,*) 'Total Operational Cost = $',YRCOST
      WRITE(4,*) '  Excluding HOT and COLD Start Costs'
      WRITE(4,*)
      WRITE(4,*) '  HOT and COLD Start Costs = $',YRPENT
      WRITE(4,*)
      WRITE(4,*) 'Total Operational Cost = $',YRCOST+YRPENT
      WRITE(4,*)
      WRITE(4,*) 'Yearly Area under Generated Power Curve ',YRPWR
C
C     WRITE(TTY,*)
C     WRITE(TTY,605) 'Program took ',(REFER2-REFER1)/60.,' minutes'
C     WRITE(TTY,*)
C     WRITE(TTY,*) 'Total Operational Cost = $',YRCOST
C     WRITE(TTY,*) '  Excluding HOT and COLD Start Costs'
C     WRITE(TTY,*)
C     WRITE(TTY,*) '  HOT and COLD Start Costs = $',YRPENT
C     WRITE(TTY,*)
C     WRITE(TTY,*) 'Total Operational Cost = $',YRCOST+YRPENT
C     WRITE(TTY,*)
C     WRITE(TTY,*) 'Press RETURN to exit from the program'
C     WRITE(TTY,*)
C     WRITE(TTY,*) 'Yearly Area under Generated Power Curve ',YRPWR
C     WRITE(TTY,*) 'Yearly purchases of non-firm power ',pwrbuy
C
C           Place End-of-File Marker at end of OUTPUT Files
      IF(WPOWER) ENDFILE 1
      IF(WMMBTU) ENDFILE 6
      IF(WBBL) ENDFILE 7
      IF(WCOST) ENDFILE 8
      ENDFILE 4
C
C           Close all Data Files
      IF(WPOWER) CLOSE(UNIT=1)
      IF(WMMBTU) CLOSE(UNIT=6)
      IF(WBBL) CLOSE(UNIT=7)
      IF(WCOST) CLOSE(UNIT=8)
      CLOSE(UNIT=2)
      CLOSE(UNIT=3)
      CLOSE(UNIT=4)
```

```
C
      PAUSE
      STOP
      END
C
C*********************************************************************
      SUBROUTINE SORT1(MC,KNT,COMMIT,MACH,PCODE,LASTHR,MINHR,COMIDX,
     $                 AVAIL,FIRST,BEST)
C
C           Routine to sort Machines(MACH) according to current
C           commitment order.  Indices stored in Integer array, COMIDX.
C
C           Order modified if STEAM machine must run. !!
C
C           COMIDX(1) = Machine number of 1st committed machine
C           COMIDX(2) = Machine number of 2nd committed machine
C                 ...
C           COMIDX(KNT) = Machine number of KNT'th committed machine
C
C           Created on:    May 17, 1994
C           Last Modified: August 11, 1994
C
C     PARAMETERS:
C
C           MC          MAXIMUM NUMBER OF MACHINE ALLOWED
C           KNT         ACTUAL NUMBER OF MACHINE IN LIST
C           COMMIT(MC)  ORDERED COMMITTED MACHINE NAME LIST
C           MACH(MC)    MACHINE NAMES
C           PCODE(MC)   PRICE CODE FOR EACH MACHINE
C           LASTHR(MC)  MACHINE RUNNING LAST HOUR  0=NOT RUNNING
C           MINHR(MC)   MINIMUM NUMBER OF HOURS TO RUN FOR EACH MACHINE
C           COMIDX(MC)  COMMITTED MACHINE INDX LIST
C           AVAIL(MC)   AVAILABLE FOR RUNNING (1=YES, 0=NO)
C           FIRST       FIRST MACHINE NUMBER TO LOOK AT
C           BEST        LOGICAL BEST SOLUTION FLAG
C                       (.FALSE. = AVAILABLE BASE UNITS MUST RUN)
C
C           J           DO LOOP VARIABLE
C           K           DO LOOP VARIABLE
C           TEMP        TEMPORARY VARIABLE
C           INDX        MACHINE INDEX FOR SORTED LIST
C
C*********************************************************************
C
      IMPLICIT NONE
      LOGICAL BEST
      INTEGER MC,KNT,COMIDX(MC),J,K,LASTHR(MC),MINHR(MC)
      INTEGER FIRST,TEMP,INDX,AVAIL(MC)
      CHARACTER COMMIT(MC)*2, MACH(MC)*2,PCODE(MC)*1
C
C           Loop according to commitment order
      DO 10 J=1,KNT
C           Loop comparing according to Machine order
        DO 20 K=1,KNT
C           Look for Match in Name
          IF(COMMIT(J).NE.MACH(K)) GO TO 20
C           Found match, Save Machine # for this Commitment
```

```
            COMIDX(J)=K
            GO TO 10
C           Next Machine
20        CONTINUE
C           Next Committed Machine in order
10      CONTINUE
C
C           Now adjust for STEAM machines that must run !!
C           Skip first 4 machines that must run if available
        FIRST=5
        DO 30 J=5,KNT
          INDX=COMIDX(J)
C           Must not be the diesel Machine, else Skip it !!
C***      IF(PCODE(INDX).NE.'K' .AND. PCODE(INDX).NE.'S') GO TO 30
          IF(PCODE(INDX).EQ.'D') GO TO 30
C
C           Make sure Machine is available, else skip
          IF(AVAIL(INDX).EQ.0) GO TO 30
C           Machine OFF and Best Solution Required, Skip it !!
C           Otherwise, Machine MUST run
C***      WRITE(4,'(2I5,3X,A,3X,I5)') J,INDX,PCODE(INDX),LASTHR(INDX)
C
          IF(LASTHR(INDX).LE.0) GO TO 30
C
C           Check for Time this Machine has been ON  > MINHR
C***        WRITE(4,*) 'LASTHR,MINHR ',LASTHR(INDX),MINHR(INDX)
            IF(LASTHR(INDX).LT.MINHR(INDX)) THEN
C             Move if different than First Machine in List
              IF(J.NE.FIRST) THEN
C***            WRITE(4,*) 'SWITCHING ',J,FIRST
                TEMP=COMIDX(J)
                COMIDX(J)=COMIDX(FIRST)
                COMIDX(FIRST)=TEMP
              ENDIF
C             Update FIRST Machine Number to replace with MUST BE ON
              FIRST=FIRST+1
            ENDIF
30      CONTINUE
C
        RETURN
        END
```

Hawaiian Electric Company
Docket No. 04-0113

Development of Composite O&M Classification
FERC Predominance Method:

Acct No.	Account Description	2004 Actual $000 Per FERC Form 1	Classification - FERC Method Demand	Energy
500	Steam - Operations Supv/Eng	$ 1,413	$ 1,413	
501	Fuel	328,149	separately to energy	
502	Steam Expenses	7,283	7,283	
503	Steam - Other Sources			
504	Less: Steam Transferred			
505	Electric Expenses	5,295	5,295	
506	Misc. Steam Power Exp	5,043	5,043	
507	Rents	70	70	
509	Allowances			
510	Maint Supv/Eng	94		94
511	Maint of Structures	3,078	3,078	
512	Maint of Boiler Plant	14,562		14,562
513	Maint of Electric Plant	9,066		9,066
514	Maint Misc Steam Power Plant	2,219	2,219	
	Total Steam Production O&M	376,272		
547	Fuel	7,132	separately to energy	
548	Generation Expense	10	10	
549	Misc. Other Power Operating	180	180	
550	Rents		-	
551	Maint Supv & Engineering	6	6	
552	Maint of Structures	98	98	
553	Maint of Gen & Elec Plant	956	956	
554	Maint of Misc Other Pwr Gen Plt	92	92	
	Total Other Production O&M	8,474		
	Total Excluding Fuel - Classified		25,743	23,722
	Classification Percentages - FERC Method >>		**52.0%**	**48.0%**

Federal Energy Regulatory Commission
Electric Rates and Corporate Regulation
Washington, D.C. 20426

Federal Energy Regulatory Commission Electric Rate Handbook

Federal
Energy
Regulatory
Commission

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considered in Philadelphia Electric need to be considered in determining whether to have an equity exclusion. 86/

VII. FUNCTIONALIZATION, CLASSIFICATION, AND ALLOCATION

In allocating costs to a particular class of customers, there are three major steps (if all cost of service issues have been resolved): (1) functionalization, (2) classification, and (3) allocation. These steps will be discussed below.

A. Functionalization

Expense items are first functionalized into five major categories:

(1) Production. Production expenses include those associated with generating or purchasing power and delivering that power to the utility's bulk transmission system. Examples of costs included in the production function are the fuel, labor, materials and supplies utilized for operation and maintenance at generating facilities.

(2) Transmission. Transmission costs are those associated with the delivery of power over the primary transmission system or wheeling between other utilities. The transmission expenses may include the cost of labor and supplies necessary to maintain high-voltage transmission lines, transformers, safety equipment, etc.

86/ In Ohio Edison Company, Initial Decision, 24 FERC ¶ 63,068, mimeo at 11-13 (August 23, 1983), the ALJ concluded that Philadelphia Electric did not apply to the facts in his case. This case, though, was settled before a Commission decision.

(3) Distribution. The costs associated with the distribution function are those incurred in connection with the delivery of power from the bulk transmission system through a secondary distribution system to the utility's consumers. Such expenses may include labor costs and materials necessary to operate and maintain distribution lines, substations, and other low voltage facilities. Because customers purchasing at wholesale for resale generally provide their own distribution facilities, the costs associated with the jurisdictional utility's distribution system usually are not assigned to the wholesale customers.

(4) Other Functions.

(a) Customer Accounts Expense. These expenses include, e.g., meter reading costs, billing expenses, and general bookkeeping costs.

(b) Sales Expenses. Included in this category of costs are items such as advertising, expenses incurred in attracting new business, showrooms, etc.

Each expense item will be segregated into the category with which it is most closely related.

While functionalization for most expense items is relatively straightforward, and not usually litigated, problems do arise with respect to the functionalization of administrative and general expenses (A&G) 87/ and general plant expenses. 88/

87/ A&G expenses include salaries of officers, executives, and office employees, employee benefits, insurance, etc.

88/ General plant includes office furniture and equipment, transportation vehicles, lockers, tools, lab equipment, etc.

With respect to general plant expenses, the Commission has stated that general plant will be functionalized by labor ratios unless it is shown that the use of labor ratios produces unreasonable results. Minnesota Power & Light Company, Opinion No. 20, 4 FERC ¶ 61,116 at 61,268 (1978). Thus labor ratios have been used to functionalize general plant in most, if not all, recent cases where the issue has been litigated. See, e.g., Kansas City Power & Light Company, Initial Decision, 21 FERC ¶ 63,003 at 65,034 (1982), affirmed, 22 FERC ¶ 61,262 (1983); Delmarva Power & Light Company, Initial Decision, 17 FERC ¶ 63,044 at 65,204 (1981), affirmed, Opinion No. 185, 24 FERC ¶ 61,199 (1983); Philadelphia Electric Company, Initial Decision, 10 FERC ¶ 63,034 at 65,355-6 (1980), affirmed, 13 FERC ¶ 61,057 (1980).

The Commission has also held that most A&G expenses are to be functionalized on the basis of labor ratios. Missouri Power & Light Company, Opinion No. 31, 5 FERC ¶ 61,086 at 61,137-8 (1978); KCPL, 21 FERC at 65,035; Delmarva, 17 FERC at 65,204. An exception to this has been established for property insurance which is functionalized on plant ratios. Pacific Gas & Electric Company, Initial Decision, 16 FERC ¶ 63,004 at 65,015-16 (1981), affirmed, Opinion No. 147, 20 FERC ¶ 61,340 (1982); Kansas-Nebraska Natural Gas Company, Opinion No. 731, 53 FPC 1691, 1722 (1975).

It should also be noted that common plant and intangible plant have been analogized to general plant and functionalized on the basis of labor ratios. KCPL, 21 FERC at 65,035; Delmarva, 17 FERC at 65,204; Philadelphia Electric, 10 FERC at 65,355-6.

Another issue that has arisen is the calculation of the labor ratios. Usually, the labor ratio consists of total labor costs in the denominator with the labor costs associated with a particular category, such as production, in the numerator where part of the expenses are being functionalized into that particular category. In a number of proceedings, companies have attempted to change the ratio by only including production, transmission, and distribution-related labor costs in the denominator; thus excluding customer service related labor costs. This, however, has been rejected. KCPL, 21 FERC at 65,033-34.

B. Classification

After functionalizing, the next step is to classify those expenses as either demand, energy, or customer-related. The classification issues most frequently litigated are: (1) whether the predominance method should be used; that is -- if an account is predominantly energy (or demand) related, should it be classified as 100% energy (or demand) or some lesser percentage; and (2) the proper classification scheme for production O&M accounts. These issues will be discussed below.

1. Predominance method

Staff for a number of years has used a method called the predominance method for classifying production O&M accounts. Under this method if an account is predominantly (51-100%) energy-related, it will be classified as energy. The same is also true with respect to demand related costs. This method has been repeatedly adopted by the Commission. See e.g., Arizona Public Service Company, 4 FERC ¶ 61,101 at 61,209-10 (1978); Illinois Power Company, Initial Decision, 11 FERC ¶ 63,040 at 65,255-6 (1980), affirmed, 15 FERC ¶ 61,050 at 61,093 (1981); Kansas City Power & Light Company, Initial Decision, 21 FERC ¶ 63,003 at 65,037 (1982), affirmed, 23 FERC ¶ 61,262 (1983); Minnesota Power & Light Company, Opinion No. 86, 11 FERC ¶ 61,312 at 61,648-9 (1980).

It should be noted, though, that if a company is able to justify a percentage split, such as 70-30, in an account, then that split may be accepted. However, in light of the Commission precedent on this subject, any party proposing a deviation from the predominance method has an especially heavy burden to carry.

2. Classification of production O&M accounts

In addition to the Commission's adoption of Staff's predominance method, the Commission has adopted Staff's classification index of production O&M accounts. Arizona Public Service Company, 4 FERC at 61,209-10; KCPL, 21 FERC at 65,037; Minnesota Power & Light Company, 11 FERC at 61,648-9. Under this

fication index the production O&M accounts are classified as follows:

CLASSIFICATION OF PRODUCTION EXPENSES

Uniform System of Accounts' Account No.	Description	Classification Demand	Classification Energy
	Steam Power Generation Operation		
500	Operation supervision and engineering	X	
501	Fuel		X
502	Steam expenses	X	
503	Steam from other sources		X
504	Steam transferred-Cr.		X
505	Electric expenses	X	
506	Miscellaneous steam power expenses	X	
507	Rents	X	
	Maintenance		
510	Supervision and engineering		X
511	Structures	X	
512	Boiler plant		X
513	Electric plant		X
514	Miscellaneous steam plant	X	
	Nuclear Power Generation Operation		
517	Operation supervision and engineering	X	
518	Fuel		X
519	Coolants and water	X	
520	Steam expenses	X	
523	Electric expenses	X	
524	Miscellaneous nuclear power expenses	X	
525	Rents	X	
	Maintenance		
528	Supervision and engineering		X
529	Structures	X	
530	Reactor plant equipment		X
531	Electric plant		X
532	Miscellaneous nuclear plant	X	

Uniform System of Accounts' Account No.	Description	Classification Demand	Classification Energy
	Hydraulic Power Generation		
	Operation		
535	Operation supervision and engineering	X	
536	Water for power,	X	
537	Hydraulic expenses	X	
538	Electric expenses	X	
539	Miscellaneous hydraulic power expenses	X	
540	Rents	X	
	Maintenance		
541	Supervision and engineering	X	
542	Structures	X	
543	Reservoirs, dams and waterways	X	
544	Electric plant		X
545	Miscellaneous hydraulic plant	X	
	Other Power Generation		
	Operation		
546	Operation Supervision and engineering	X	
547	Fuel		X
548	Generation expenses	X	
549	Miscellaneous other power generation	X	
550	Rents	X	
	Maintenance		
551	Supervision and engineering	X	
552	Structures	X	
553	Generating and electric equipment	X	
554	Miscellaneous other power generation plant	X	
	Other Power Supply Expenses		
555	Purchased power		As billed
556	System control and load dispatching	X	
557	Other expenses	X	

While this classification index may not be appropriate for every utility, any party advocating a deviation from this index has a heavy burden to overcome.

C. Allocation

After classifying costs to demand, energy, and customer categories, the next step is to allocate these costs to the various classes to determine their respective cost responsibilities. The allocation of these cost categories, with particular emphasis on the allocation of demand costs, will be discussed below.

1. Allocation of demand costs

The allocation of demand costs is a complex and often litigated issue. The particular issues that are usually litigated are: (1) which coincident peak (CP) demand allocation method (1 CP, 3 CP, 4 CP, or 12 CP) should be adopted; (2) whether the numerator (CP's) and/or the denominator (total system demands) in the demand allocator have been properly projected; and (3) whether transmission costs should be rolled-in and allocated on the same basis. These issues will be discussed below. However, before doing so because of the complexity of the issues, a number of terms will be defined.

a. Definitions

(1) Coincident Peak (CP) demands -

Demands of a particular customer or class occurring at the time of the system peak for a particular time period.

(2) Noncoincident Peak (NCP) demands -

The maximum demands of a particular customer or class for a particular time period.

(3) Coincidence Factor (CF) -

CP's divided by NCP's for a particular time period.

(4) Diversity Factor -

The inverse of a CF.

(5) Load Factor (LF)

$$LF(\%) = \frac{\text{Kwh's in a particular period}}{(\text{Max Kw}) \times (\text{No. of hours in that period})}$$

b. Choice of CP Methodology

The four CP methods which have been accepted in cases at this Commission are 1 CP, 3 CP, 4 CP, and 12 CP. Under a 1 CP method the allocator for a particular wholesale class will be the following:

$$\frac{\text{Wholesale class' CP for the peak month}}{\text{Total company system peak}}$$ 89/

Similarly, for 3, 4, and 12 CP companies the numerator would consist of the average of the wholesale class' coincident peaks for each of the peak months while the denominator would consist of the average of the total system peaks for each of the peak months.

89/ Since the CP demands are measured at the customer's meter and the total system demands are measured at the generating plants, it is necessary to increase the CP demands to account for losses.

While this Commission has not established a hard and fast rule for determining which allocation method is appropriate, this Commission has set out certain factors which must be considered:

> [T]he full range of a company's operating realities including, in addition to system demand, scheduled maintenance, unscheduled outages, diversity, reserve requirements, and off-system sales commitments.

Carolina Power & Light Company, Opinion No. 19, 4 FERC ¶ 61,197 at 61,230 (1978); Commonwealth Edison Company, Initial Decision, 15 FERC ¶ 63,048 at 65,196 (1981), affirmed, Opinion No. 165, 23 FERC ¶ 61,219 (1983); Illinois Power Company, Initial Decision, 11 FERC ¶ 63,040 at 65,247-8 (1980), affirmed, 15 FERC ¶ 61,050 (1981). The major factors will be discussed below.

(1). System demand tests

If a utility's system demand curve is relatively flat, then that supports the use of a 12 CP method. If a utility experiences a pronounced peak during one, three, or four consecutive months, then that supports the use of a 1,3, or 4 CP method, respectively.

In determining whether a utility experiences a pronounced peak during a particular time period, a number of tests are used. First, the average of the system peaks during the purported peak period as a percentage of the annual peak should be compared to the average of the system peaks during the off-peak months as a percentage of the annual peak. Large

differences between these two figures lends support to using something other than a 12 CP method while a smaller difference supports 12 CP. This comparison has been used in the following cases:

(1) Louisiana Power & Light Company,
Opinion No. 813,
(31% difference - 4 CP);

(2) Louisiana Power & Light Company,
Opinion No. 110,
(26% difference - 4 CP)

(3) Lockhart Power Company,
Opinion No. 29,
(18% difference - 12 CP);

(4) Illinois Power Company,
11 FERC at 65,248,
(19% - 12 CP); and

(5) Commonwealth Edison Company,
15 FERC at 65,196,
(16.4-24.9% differences - 4 CP).

A second test used has been to look at the lowest monthly peak as a percentage of the annual peak. The higher the percentage, the greater the support for 12 CP and vice-versa. This test has been used in the following cases:

(1) Louisiana Power & Light Company,
Opinion No. 813,
(56% - 4 CP);

(2) Idaho Power Company,
Opinion No. 13,
(58% - 3 CP);

(3) Southwestern Electric Power Company,
Opinion No. 28,
(55.8% - 4 CP);

(4) Lockhart Power Company,
Opinion NO. 29
(73% - 12 CP);

(5) Southern California Edison Company,
Opinion No. 821,
(79% - 12 CP);

(6) Alabama Power Company,
Opinion No. 54,
(75% - 12 CP);

(7) Illinois Power Co.
11 FERC at 65,248,
(66% - 12 CP);

(8) Commonwealth Edison Company,
15 FERC at 65,198,
(64.6-67.8% - 4 CP)

(9) Louisiana Power & Light Co.,
Opinion No. 110,
(61.9% - 4 CP);

(10) El Paso Electric Co.,
Opinion No. 109,
(71% -12 CP);

(11) Carolina Power & Light Company,
Opinion No. 19,
(72% - 12 CP);

(12) New England Power Company,
Opinion No. 803,
(80% - 12 CP)

Another test is the extent to which peak demands in non-peak months exceed the peak demands in the alleged peak months. In Carolina Power & Light Company, Opinion No. 19, the Commission adopted a 12 CP approach where the monthly peaks in three nonpeak months exceeded the peaks in two of the alleged peak months. In Commonwealth Edison Company, 15 FERC at 65,198 a 4 CP method was adopted where over a four year period, a

peak in one of the 4 peak months was only exceeded once by a peak from a non-peak month.

Another test is the average of the twelve monthly peaks as a percentage of the highest monthly peak. This test has been used in the following cases:

(1) Illinois Power Co.
(81% - 12 CP);

(2) El Paso
Opinion No. 109,
(84% - 12 CP);

(3) Lockhart Power
Opinion No. 29,
(84% - 12 CP);

(4) Southern California Edison,
Opinion No. 821,
(87.8% - 12 CP)

(5) Louisiana Power & Light Co.,
Opinion No. 110,
(81.2% - 4 CP); and

(6) Commonwealth Edison Co.,
15 FERC at 65,198,
(79.4-79.5% - 4 CP)

(2). Tests relating to reserves/maintenance

To the extent a utility uses the off-peak months to perform its scheduled maintenance, that supports the use of 12 CP. Alabama Power Company, Opinion No. 54, 8 FERC ¶ 61,083 at 61327 (1979); Illinois Power Company, 11 FERC at 65,249; New England Power Company, Opinion No. 803, 58 FPC 2322, 2338 (1977); but see Commonwealth Edison, 15 FERC at 65,199.

However, the scheduled maintenance must be considered together with the reserves available after the maintenance.

To the extent the reserve margins are fairly stable after maintenance, then a 12 CP method is supported. If the reserve margins drop substantially to marginal levels during certain months, then a method other than 12 CP would be supported. Reserves after maintenance have been considered in:

(1) Illinois Power Co., 11 FERC at 65,249

(46 percent for 8 non-summer months and 34.5 percent for summer months -- 12 CP);

(2) Commonwealth Edison Co., 15 FERC at

(For 1979 36.63 percent for 8 non-summer months and 22.15 percent for 4 summer months -- 4 CP).

c. Projection of CP and total system demands

In challenging either the numerator or the denominator of the demand allocator, the general standards for challenging estimates apply. That is -- after the company has met its initial burden, the challenging party must show that the estimate was unreasonable when made or that the estimates substantially differ from the actuals. See section II.A., supra. In determining whether the company's estimates should be rejected, a number of items should be considered.

First, if the company used coincident factors or load factors from one year or Period I to derive its Period II estimates, was that year a representative year? One way of determining this is to look at degree day data which will show whether that year was abnormal in terms of weather. In

addition, it is possible to attack the use of only one year to derive the Period II estimate as being unreasonable. That is -- multiple years of historical data should be used in developing the estimate, not just one year. See e.g. Otter Tail Power Company, Opinion No. 93, 12 FERC ¶ 61,169 at 61,429 (1980); Commonwealth Edison Co., Initial Decision, 15 FERC at 65,190, affirmed, Opinion No. 165, 23 FERC ¶ 61,219 (1983) (3 yr. average adopted). The Commission has, however, adopted CP projections based on the use of one year's data. Carolina Power & Light Co., Opinion No. 19, 4 FERC at 61,229-30.

Second, if the company trended multiple years data through a regression analysis to derive its estimate, the first question should be what is the correlation coefficient for that analysis? If the correlation is low, then the use of a regression analysis may be improper. Each of the years used should also be examined to determine if any are abnormal. Degree data is one tool that can be used.

Third, the numerator and the denominator should be developed on similar bases. Thus in Otter Tail Power Company, Opinion No. 93, 12 FERC at 61,429, the Commission modified a demand allocator to provide for the use of the same number of years data in the derivation of both the numerator and the denominator.

Fourth, if the company's estimating process produces CP's that are greater than NCP's, then there is a problem

because NCP's represent the maximum demand. This may be explained by the fact that NCP's are usually determined on a billing month basis while CP's are determined on a calendar month basis. If the CP's and the NCP's are derived over the same time period, however, then there is a definite problem with the company's estimating process.

Fifth, billing demands should be calculated in a consistent fashion with the demands used in the demand allocator. See El Paso Electric Co., Opinion No. 109, 14 FERC ¶ 61,081 at 61,147 (1981).

In any event, the company's estimating process should be thoroughly examined to determine if it is appropriate.

d. Rolled-in transmission

A utility's transmission network will consist of transmission 90/, sub-transmission 91/, and distribution facilities. 92/ Usually only transmission and sub-transmission facilities are used to provide service to wholesale customers; therefore, distribution facilities will rarely be at issue in electric rate cases at FERC.

90/ Typically transmission voltages are 115 kv and above, though some systems have transmission facilities at lower voltage levels.

91/ Sub-transmission voltages are usually between 23 kv and 115 kv, though it depends upon the system.

92/ Distribution voltages are usually below 23 kv.

The primary question that arises in proceedings at FERC is how the transmission and sub-transmission facilities should be allocated to the wholesale customers. This will be discussed below.

In the vast majority of cases where this issue has been litigated, all transmission and sub-transmission facilities have been rolled-in. 93/ Potomac Edison Company, Initial Decision, 20 FERC ¶ 63,060 (1983); Southern California Edison Company, 59 FPC 2167, 2179-80 (1977), reh. denied, 2 FERC ¶ 61,018 (1978); Florida Power & Light Co., 56 FPC 3581, 3604-05 (1976); Public Service Company of Indiana, 56 FPC 3003, 3034-36 (1976); Union Electric Company, 47 FPC 144, 151, 172 (1972); Utah Power & Light Company, Opinion No. 114, 14 FERC ¶ 61,162 at 61,296 (1981); Alabama Power Company, Opinion No. 54, 8 FERC ¶ 61,083 at 61,327-30 (1979); Illinois Power Company, Initial Decisoin, 11 FERC ¶ 63,046 at 65,252 (1980), affirmed, 15 FERC ¶ 61,050 (1981). Indeed, the Commission has stated that it is "the policy of this Commission to roll-in all transmission facilities." Idaho Power Company, Opinion No. 13, 3 FERC ¶ 61,108 at 61,296 (1978).

93/ Transmission facilities have even been rolled-in where they are not directly connected to the utility's transmission grid. Public Service Company of New Hampshire, Initial Decision, 22 FERC ¶ 63,083 (1983), affirmed 24 FERC ¶ 61,007 (1983).

The basis for this policy is that all electric utilities have integrated systems and generating plants scattered throughout their service territories. Thus in most instances, the entire grid will provide some benefit to each and every customer.

There have been, however, a few exceptions to this policy, though the Commission has stated that "[w]e will narrowly limit any exceptions to the rolling-in procedure." Missouri Utilities Co., Opinion No. 82, 10 FERC ¶ 61,297 at 61,599 (1980). These exceptions have involved two circumstances: (1) where a single long line has been excluded from The transmission costs and (2) where the sub-transmission and transmission facilities have been allocated separately. The cases detailing these exceptions will be set out below.

Idaho Power Company, Opinion No. 13, 3 FERC ¶ 61,108 at 61,295 (1978) involved:

> unusually long transmission lines ranging from 67 miles to 110 miles from Idaho's main transmission system, together with certain substations and metering facilities. The facilities were installed to serve Cal-Pac in a remote area and were built especially for that purpose, although Idaho does utilize the facilities for purposes other than service to Cal-Pac. (FN omitted).

The Commission, therein, held that these facilities should not be rolled-in, but directly assigned to Cal-Pac. Id. at 61,296.

In Minnesota Power & Light Company, Initial Decision, 16 FERC ¶ 63,012 at 65,070 (1981), the judge held that the sub-transmission costs should be allocated separately from the transmission costs. The four questions that the judge considered critical in making his determination were (Id. at 65,071):

> (1) Whether the reliability of service to customers served at 115 kv is affected by the sub-transmission system;
>
> (2) Whether there is any significant system-wide cost savings to be realized as a result of the sub-transmission system;
>
> (3) Whether loads served directly from 115 kv cause additional sub-transmission facilities to be built; and
>
> (4) Whether MP&L builds sub-transmission facilities to assist in providing service at 115 kv.

The judge found that the record evidence supported negative answers to all four questions. It should be noted that the judge in reaching this conclusion stated that "what is the common, prevailing situation" should be used in answering these questions. Id. at 65,071-72. Thus the judge held that if various switches were usually in an open position 94/, then this issue should be determined assuming the switches were open. Id. at 65,072. The judge's decision was

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94/ If a switch is open, then power cannot flow over that line.

subsequently affirmed by the Commission in Opinion No. 155, 21 FERC ¶ 61,233 (1982). 95/

Therefore, while the Commission's policy is to roll-in all transmission and sub-transmission facilities, exceptions to that general policy have been granted in certain instances.

2. Allocation of energy costs

Energy costs are allocated to particular classes of customers through the following formula:

$$\frac{\text{Estimated firm energy usage (Kwh's) by the wholesale class over the test period}}{\text{Total system firm energy usage (kwh's) over the test period}}$$ 96/

There is usually little controversy, however, with respect to this allocation. If there is any controversy, it is with the projections of energy usage. The questions arising with respect to energy projections are many of the same questions that occur with respect to demand allocation which were discussed above.

95/ In four previous Minnesota Power & Light Company cases this Commission held that sub-transmission should be separated from transmission. Opinion No. 87, 11 FERC ¶ 61,313 at 61,660 (1980); Opinion No. 86, 11 FERC ¶ 61,312 at 61,645-46 (1980); Opinion No. 20, 4 FERC ¶ 61,116 (1978); Opinion No. 12, 3 FERC ¶ 61,045 (1978).

96/ Since the wholesale energy usage is measured at the customer's meter and the system energy usage is measured at the generating plants, it is necessary to add losses back into the numerator.

3. Allocation of Customer Costs.

There is no hard-and-fast method of allocating customer costs. It will depend upon the types of costs involved. In any event, this issue is one which is usually not the subject of litigation, since the dollars involved are not substantial in most cases.

VIII. RATE DESIGN

After the total revenue requirement is determined, then it is necessary to determine the unit charges or rates. This is called rate design. While different rate designs may shift costs between customers, the overall revenue requirement will not be affected.

In most electric cases, the rates are determined as follows. First, in deriving the demand charge for a class, the total demand costs allocated to that class will be divided by the total estimated billing demand (kw) for that class. Second, in deriving the energy charge for that class, the total energy costs allocated to that class will be divided by the total estimated energy usage (kwh's) for that class. While this seems to be straightforward, a number of issues arise which eliminate the simplicity. These issues are:

(1) whether there should be a rate tilt; that is -- whether any demand costs should be shifted into the energy charge or vice-versa;

(2) whether particular customers should be in a particular class;

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	No. Cust.	% of Total Customers	Account 909 ESD[1]	Account 909 Total	Account 910 - DSM	Account 910 - NON-DSM ALL Div Excl Ed & Cons Affairs, SN, SR Divs.[3]	Account 910 - NON-DSM Ed & Cons Affairs[2]	Account 910 - NON-DSM ESD - SN & SR Divs[3]	Account 910 - NON-DSM Total	Account 911 Corp Comm, Environ, ESD[1]	Account 911 Total	Account 912 CSD[1]	Account 912 Total	Cust Serv Ex Account 909-912 Total DSM	Cust Serv Ex Account 909-912 NON-DSM ($000s)	Cust Serv Ex Account 909-912 Total DSM ($000s)	TOTAL CUST SERV EXP ($000s)	TOTAL CUST SERV EXP (C8 FCT, %)
Schedule R/E	257,519																	
	129																	
	257,648	88.307%	$27.4		$16,096.4	$1,375.3	$391.9		$1,767.2	$292.4		$30.0		$2,117.0		$0.0	$2,117.0	56.702%
Schedule G	16,121																	
	9,508																	
	25,629	8.784%	$2.7		$130.0	$136.8			$136.8	$29.1		$3.0		$171.6		$0.0	$171.6	4.596%
Schedule J - DP	4																	
	127																	
	131																	
Schedule J - DS	1																	
	22																	
	23																	
Schedule J - Pri	5																	
	149																	
	154																	
Schedule J - Sec	547																	
	5,953																	
	6,500																	
Schedule J - Nwk	0																	
	24																	
	24																	
Schedule J - Sec	547																	
	5,977																	
	6,524																	
Schedule J Total	552																	
	6,128																	
	6,680	2.290%	$0.7		$4,997.7	$35.7		$1,317.1	$1,352.8	$7.6		$0.8		$1,361.9		$0.0	$1,361.9	36.477%
Schedule H/K	332																	
	710																	
	1,042	0.357%	$0.1		$8.1	$5.6			$5.6	$1.2		$0.1		$7.0		$0.0	$7.0	0.187%
Schedule PS	190	0.065%	$0.0		$3,104.8	$1.0		$37.5	$38.5	$0.2		$0.0		$38.7		$0.0	$38.7	1.037%
Schedule PP	166	0.057%	$0.0		$5,923.3	$0.9		$32.7	$33.6	$0.2		$0.0		$33.8		$0.0	$33.8	0.905%
Schedule PT	4	0.001%	$0.0		$13.5	$0.0		$0.8	$0.8	$0.0		$0.0		$0.8		$0.0	$0.8	0.021%
	360																	
Schedule F - Pri																		
Metered	52																	
Unmetered	275																	
	327																	
Schedule F - Sec																		
Metered	79																	
Flat	0																	
	79																	
Schedule F - Total																		
Metered	131																	
Unmetered	275																	
	406	0.139%	$0.0		$0.0	$2.2			$2.2	$0.5		$0.0		$2.7		$0.0	$2.7	0.073%
TOTAL	291,765	100.000%	$31.0		$30,273.8	$1,557.4	$391.9	$1,388.1	$3,337.4	$331.1		$34.0		$3,733.5			$3,733.5	99.998%
			$30.9			$1,557.5		$1,388.1	$3,337.5	$331.2		$33.9		$3,733.5		$0.0		

[1] Allocation basis - % of customers (all rate classes).
[2] Allocation basis - 100% residential class. See e-mail from K. DeSilva dated 3/26/04.
[3] Allocate to Schedules J, PS, PP, and PT.

C8 Factor - No DSM

Pricing/Es 7-14-04
HECO_TY_2005_COS_Cust_Allo_Fct_NO DSM
C8 - Cust Serv -P1

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