

**BEFORE THE KANSAS CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of Southern)
Pioneer Electric Company for Approval to) Docket No. 20-SPEE-169-RTS
Make Certain Changes in its Charged for)
Electric Service.

**PREFILED DIRECT TESTIMONY OF
RICHARD J. MACKE
VICE PRESIDENT, ECONOMICS, RATES, AND BUSINESS
PLANNING
POWER SYSTEM ENGINEERING, INC.**

**ON BEHALF OF
SOUTHERN PIONEER ELECTRIC COMPANY**

October 10, 2019

TABLE OF CONTENTS

PART I - QUALIFICATIONS	1
PART II - SUMMARY OF DIRECT TESTIMONY	5
PART III - CLASS COST OF SERVICE ANALYSIS	5
PART IV - RATE DESIGN	16
A. Rate Change Request - Current Rates.....	19
B. Rate Change Request - LED Lighting	23
C. Rate Change Request - Grid Access Charge	255

TABLES

Table 1 - Retail Class Cost of Service Summary.....	15
Table 2 - Class Allocation Summary	15
Table 3 - Rate Design Factors.....	16
Table 4 - Proposed Rate Schedule Revenue	19
Table 5 - Change in Rate Schedule Revenue.....	20
Table 6 - Southern Pioneer Electric Company - LED Lighting Analysis - Summary.....	24
Table 7 - Southern Pioneer Electric Company - LED Flood Lighting Analysis - Summary .	24
Table 8 - DG Grid Access Charge - Summary	26

EXHIBITS

Exhibit PSE-1	- Curriculum Vitae - Richard J. Macke
Exhibit PSE-4	- Class Cost of Service Analysis
Exhibit PSE-5	- LED Lighting Analysis
Exhibit PSE-6	- Grid Access Charge Analysis
Exhibit PSE-7	- Statement of Operations - Proposed Rates
Exhibit PSE-8	- Comparison of Present and Proposed Rate Schedules

**PREFILED DIRECT TESTIMONY
RICHARD J. MACKE
VICE PRESIDENT, RATES AND FINANCIAL PLANNING
POWER SYSTEM ENGINEERING, INC.**

**ON BEHALF OF
SOUTHERN PIONEER ELECTRIC COMPANY**

PART I - QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Richard J. Macke. My business address is 10710 Town Square Drive NE, Suite 201, Minneapolis, Minnesota 55449.

Q. What is your profession?

A. I am a Vice President and lead the Economics, Rates, and Business Planning Department at Power System Engineering, Inc. ("PSE"), which is headquartered at 1532 W. Broadway, Madison, Wisconsin 53713.

Q. Please describe the business activities of PSE.

A. PSE is a consulting firm serving electric utilities across the country, but primarily in the Midwest. Our headquarters is in Madison, Wisconsin with regional offices in Indianapolis, Indiana; Topeka, Kansas; Lexington, Kentucky; Minneapolis, Minnesota; Marietta, Ohio; and Sioux Falls, South Dakota. PSE is involved in: power supply, transmission and distribution system planning; distribution, substation and transmission design; construction contracting and supervision; retail and wholesale rate and cost of service ("COS") studies; economic feasibility studies; merger and acquisition feasibility analysis; load forecasting; financial and operating consultation; telecommunication and network design, mapping/GIS; and system automation including Supervisory Control and Data Acquisition ("SCADA"), Demand Side Management ("DSM"), metering, and outage management systems.

1 **Q. Please describe your responsibilities with PSE.**

2 A. I lead and direct staff in Indiana, Kansas, Minnesota, and Wisconsin who provide economic,
3 financial, and rate-related consulting services to investor-owned, cooperative and municipal
4 utilities as well as regulators and industry associations. These services include:

- 5 • Cost of Service Studies.
- 6 • Capital Credit Allocations.
- 7 • Demand Response.
- 8 • Distributed Generation Rates.
- 9 • Energy Efficiency.
- 10 • Financial Forecasting.
- 11 • Individual Customer Profitability.
- 12 • Large Power Contract Rates/Proposals.
- 13 • Line Extension Policies/Charges.
- 14 • Load Management Analysis.
- 15 • Load Forecasting.
- 16 • Market and Load Research.
- 17 • Merger Analysis.
- 18 • Pole Attachment Charges.
- 19 • Policy and Board Audits.
- 20 • Power Cost Adjustments.
- 21 • Rate Consolidation.
- 22 • Retail Rate Design and Analysis.
- 23 • Special Fees and Charges.
- 24 • Statistical Performance Measurement (Benchmarking).
- 25 • Value of Service.

11 **Q. What is your educational background?**

12 A. I graduated from Bethel University in St. Paul, Minnesota in 1996 with a Bachelor of Arts
13 degree in Business, which included an emphasis in Finance and Marketing. In 2007, I received
14 my Master of Business Administration degree, with an emphasis in Finance and Strategic
15 Management, from the University of Minnesota in Minneapolis, Minnesota. I have also
16 attended numerous industry seminars/courses on cost of service, pricing, valuation, distributed
17 generation, etc.

18 **Q. What is your professional background?**

19 A. From 1996 to 1998, I was employed by PSE in its Minneapolis, Minnesota office as a Financial
20 Analyst in the Utility Planning and Rates Department. My work responsibilities primarily
21 were focused on retail rate studies, including revenue requirements and bundled/unbundled
22 COS studies. I also provided analyses used to support testimony, mergers and acquisitions,
23 and financial forecasting.

1 From 1998 to 1999, I was employed as a Senior Analyst by Energy & Resource Consulting
2 Group, LLC in Denver, Colorado, a financial, engineering, and management consulting firm.
3 I performed consulting services related to electric, gas, and water rate studies. As part of the
4 Legend Consulting Advisor Team contracted by the City Council of the City of New Orleans,
5 Louisiana, I assisted in various electric and gas utility matters. I also provided general
6 financial, management, and public policy support to clients.

7 I rejoined PSE in 1999; and from 1999 to 2002, I held the position of Rate and Financial
8 Analyst in the Rates and Financial Planning Department. From 2002 to March 2008, I held
9 the position of Senior Rate and Financial Analyst in the Utility Planning and Rate Division.
10 My responsibilities have included performing complex financial analyses, such as rate studies
11 consisting of determination of revenue requirements, bundled and unbundled COS analysis,
12 and rate design. Other responsibilities included performing analysis of special rates and
13 programs, key account analyses, financial forecasting, merger and acquisition analysis,
14 activity-based costing, policy development and evaluation, and other financial analyses for
15 various PSE clients. Additional responsibilities included strategic planning, litigation support,
16 regulatory compliance, capital expenditure and operational assessments, and advisement.
17 From April 2008 to June 2010, I held the position of Leader, Rates and Financial Planning. In
18 July 2010, I was named Vice President, Rates and Financial Planning. Since June 2011, I have
19 held the position of Vice President, Economics, Rates, and Business Planning. In this capacity,
20 I continue to provide, amongst other things: 1) rate, financial, and economic consulting
21 services to clients, 2) management and leadership to the Economics, Rates, and Business
22 Planning Department, and 3) management and leadership at the corporate level to PSE through
23 participation on the Executive Committee and Board of Directors.

24

25

1 **Q. Have you previously presented testimony before the Kansas Corporation Commission**
2 **(“KCC” or “Commission”)?**

3 A. Yes. I submitted testimony on behalf of: Pioneer Electric Cooperative, Inc. in Docket No. 09-
4 PNRE-563-RTS; Wheatland Electric Cooperative, Inc. in Docket No. 09-WHLE-681-RTS;
5 Mid-Kansas Electric Company, LLC (“Mid-Kansas”) in Docket Nos. 09-MKEE-969-RTS, 11-
6 MKEE-439-RTS, 12-MKEE-491-RTS, 12-MKEE-380-RTS, 13-MKEE-452-MIS, and 16-
7 MKEE-023-TAR; Southern Pioneer Electric Company (“Southern Pioneer”) in Docket Nos.
8 14-SPEE-507-RTS, 15-SPEE-161-RTS, 15-SPEE-519-RTS, 16-SPEE-497-RTS, 16-SPEE-
9 501-TAR, 17-SPEE-476-TAR, and 18-SPEE-477-RTS; Prairie Land Electric Cooperative,
10 Inc. in Docket No. 16-PLCE-490-TAR; Victory Electric Cooperative Association, Inc. in
11 Docket No. 16-VICE-494-TAR; and Western Cooperative Electric Association in Docket No.
12 16-WSTE-496-TAR.

13 **Q. Do you have any other relevant experience?**

14 A. Yes. I have directed well over 100 rate and COS studies and numerous other rate and financial
15 related projects. Many times, these projects were conducted for self-regulated electric utilities.
16 I have also performed such analyses for state-regulated cooperatives in Iowa, Kansas,
17 Michigan, Minnesota, New Hampshire, and Texas.

18 I have also conducted seminars and made presentations to utilities, consumers, and industry
19 groups on a variety of topics including: COS, rate design, rate change communications, line
20 extension policies, mergers and acquisitions, DSM pilot programs, conservation and energy
21 efficiency, distributed generation rates, and industry trends.

22

23

24

25

PART II - SUMMARY OF DIRECT TESTIMONY

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony is to present my analysis of the Class COS study and certain proposed rates for the Southern Pioneer Electric Company (“Southern Pioneer” or “Company”).

Q. Are you sponsoring any exhibits?

A. Yes. I have included the following exhibits detailing the analysis completed:

Exhibit PSE-1 - Curriculum Vitae - Richard J. Macke.

Exhibit PSE-4 - Class Cost of Service Analysis.

Exhibit PSE-5 - LED Lighting Analysis.

Exhibit PSE-6 - Grid Access Charge Analysis.

Exhibit PSE-7 - Statement of Operations - Proposed Rates.

Exhibit PSE-8 - Comparison of Present and Proposed Rate Schedules.

Q. Have the exhibits been prepared by you or by others under your supervision?

A. Yes.

PART III - CLASS COST OF SERVICE ANALYSIS

Q. Please explain the Class COS study analysis you prepared for Southern Pioneer.

A. I prepared the retail Class COS analysis to evaluate the cost of providing service to Southern Pioneer’s retail rate classes and to provide information used in evaluating and designing retail rates. The basic objective of a Class COS is to identify the cost of providing service to each rate class as a function of load and service characteristics. The methodology employed is often referred to as the “fully allocated average embedded” COS approach, meaning that 1) costs are allocated on an average system-wide basis and 2) embedded or accounting costs as recorded on the utility’s books are used in the analysis. I believe that this is generally the most

1 appropriate technique to use in allocating cost responsibility to the various classes and
2 developing rate design data.

3 **Q. Please describe the Class COS you prepared.**

4 A. Exhibit PSE-4 includes the Class COS analysis. The detailed calculations and assumptions
5 that go into the analysis are organized as follows:

<u>Pages</u>	<u>Description</u>
1-3	Cost of Service Summary
4-5	Classification of Plant in Service
6-11	Classification of Revenue Requirements
12-13	Adjusted Statement of Operations
14-17	Summary of Classification Factors
18	Summary of Allocation of Revenue Requirements to Rate Classes
19	Allocation of Plant in Service to Rate Classes
20-22	Allocation of Revenue Requirements to Rate Classes
23	Rate Class Weighting Factors
24	Summary of Class Demands
25-27	Calculation of Class Demand Characteristics
28-29	Development of Allocation Factors.

13
14 **Q. Please explain the general procedure for conducting a Class COS study.**

15 A. The basic procedure used to determine the cost responsibility of each consumer classification
16 is as follows:

17 Step 1 - Classify the plant account records into basic cost causative categories.

18 Step 2 - Classify the Test Year expenses and margin requirement into the same cost
19 causative categories.

20 Step 3 - Develop allocation factors for each rate class.

21 Step 4 - Allocate costs to the various rate classes using the class allocation factors
22 developed for each cost causative category.

23 **Q. Please explain the process of classification into cost causative categories.**

24

25

1 A. Plant investments, Test Year expenses, and margin requirement are classified into the
2 following cost causative categories:

3 1. Direct - Plant and costs which are directly attributable to one specific customer
4 classification. Expense associated with security and street lighting is an example of a
5 Direct Expense.

6 2. Consumer - Plant and costs that are directly related to the number of customers and
7 which do not vary significantly with the demand imposed on the system or the amount
8 of energy consumed. Metering and customer accounting expenses best illustrate this
9 type of expense.

10 3. Capacity - Plant and costs which result from providing and maintaining in readiness
11 for operation facilities required to meet the peak demand whether it be the system peak,
12 circuit peak, or individual customer service peak. At least a portion of the expense of
13 owning, operating, and maintaining a three-phase backbone feeder (100 percent in this
14 study) fall within this category as does the demand charge and transmission costs from
15 the purchased power rate/bills.

16 4. Energy - Costs which are related to the amount of energy used. The major items in this
17 category are the Energy Charge and Energy Cost Adjustment (“ECA”) in the wholesale
18 purchased power rate.

19 Each of these general cost causative categories is further subdivided as follows:
20
21
22
23
24
25

<u>Direct</u>	<u>Consumer</u>	<u>Capacity</u>	<u>Energy</u>
As Assigned	Secondary & Service Meter Customer Accounting	Power Supply Transmission Distribution Substation Primary Line Line Transformer	Power Supply

1
2
3
4
5
6 **Q. Please explain the methodology used in assigning plant accounts to cost causative**
7 **categories.**

8 A. The cost causative classification of the various electric plant accounts is presented on pages 4
9 and 5 of Exhibit PSE-4. The methodology used in assigning the plant accounts to the cost
10 causative categories is discussed as follows:

- 11 1. Intangible Plant (Acct. 301 to 303) - The Intangible Plant accounts were prorated to the
12 cost categories in the same relationship as the distribution plant allocations, as
13 discussed below.
- 14 2. Transmission Plant (Acct. 350-359) - The Transmission Plant accounts were assigned
15 to the Capacity component.
- 16 3. Distribution Plant was classified as following:
 - 17 • Land, Structures, Station and Battery (Accts. 360 to 363) - The Land and Land
18 Rights, Structures and Improvements, Station Equipment, and Battery accounts
19 were classified as Capacity related since the facilities represented by the investment
20 are generally dictated by capacity considerations.
 - 21 • Primary Line and Devices (Accts. 364, 365, 366, 367) - The Primary Line and
22 Device accounts were assigned to the Capacity component.
 - 23 • Line Transformers (Acct. 368) - Classification of the Line Transformer account
24 was assigned to the Capacity component.

- 1 • Services and Meters (Accts. 369 and 370) - Because the investment in Services and
2 Meters is basically independent of usage level, it was assigned entirely to the
3 Consumer component.
- 4 • Consumer Premise (Acct. 371) - The investment in installations on Consumer's
5 Premises was assigned to the Capacity component (Primary Line).
- 6 • Street Lighting (Acct. 373) - Investment in street or security lighting facilities was
7 assigned directly to the Lighting Class (i.e. direct-assigned).
- 8 4. General Plant Accounts (Accts. 389 to 399) - The General Plant accounts were assigned
9 to the cost causative categories in the same relationship as the total distribution plant
10 allocations. Because the assignment of the investment in general plant has minimal
11 impact on the classification of Test Year expenses, which ultimately is used to
12 determine class COS responsibility, a more detailed analysis of general plant
13 investment was not warranted.

14 **Q. Please explain how revenue requirements were classified.**

15 A. The Adjusted Operating Statement shown in Exhibit PSE-4, pages 12 and 13, forms the basis
16 for the revenue requirements included in the COS analysis.¹ Actual expenses by account for
17 the historical 12-month period were used to establish the pattern of the Test Year cost
18 breakdown to the various accounts.

19 The various components of the revenue requirements were classified to the four basic cost
20 causative categories as presented on pages 6 through 11 of Exhibit PSE-4. The factors used in
21

22 ¹ Adjusted Operating Statement used in the retail COS is based on the same Operating Statement as developed
23 in the Revenue Requirements portion of the analysis contained in Exhibit PSE-2, with the following
24 appropriate adjustments performed in order to reflect the revenue requirements included in the retail COS:
25 (1) elimination of revenue and expenses associated with the non-adjustable special rates (Real-Time Pricing,
or RTP, and Transmission Level Service, or STR), as well as (2) subtraction of the revenues and expenses
related to the wholesale Local Access Delivery Service (performed using results as approved in the 18-
SPEE-477-RTS Docket).

1 the expense classification are summarized on pages 14 through 17 of Exhibit PSE-4. The
2 process and rationale for that methodology is discussed below:

- 3 1. Purchased Power (Acct. 555) - The demand and energy charge portions of the cost of
4 Purchased Power were assigned to the Capacity and Energy components, respectively.
- 5 2. Transmission Operation and Maintenance (Acct. 560-573) - These accounts were
6 assigned to the Capacity component.
- 7 3. Distribution Operation and Maintenance (Accts. 580 - 598) - Distribution expense
8 accounts that are related to specific plant accounts (Accts. 582, 583, 584, 585, 586, 587,
9 591, 592, 593, 594, 595, 596, and 597) were classified in proportion to the
10 corresponding plant accounts. These expenses result from operating and maintaining
11 the distribution plant and thus may be considered plant related. The remaining
12 distribution expense accounts (Accts. 580, 581, 588, 589, 590, and 598) were prorated
13 based on the sum of the previously assigned distribution expense accounts. These
14 accounts basically represent overhead or general distribution expenses.
- 15 3. Consumer Accounting (Accts. 901 - 905) - Consumer Accounting expenses were
16 assigned in total to the Consumer component since this expense is basically
17 independent of energy usage or capacity requirements. Instead, these accounts are
18 related to the number of consumers.
- 19 4. Consumer Service and Information and Sales (Accts. 907 - 916) - Consumer Service
20 and Information and Sales expenses are also considered consumer-related expenses.
- 21 5. Administrative and General or "A&G" (Accts. 920 - 932) - A&G expenses are common
22 costs for which there exists no obvious relationship to the functional categories. Thus,
23 we have assigned portions to all four basic cost categories (with 10 percent supporting
24
25

1 the Power Supply function, around 5 percent - the Transmission function, and the
2 remainder assigned in proportion to the total of all other expenses).²

3 6. Depreciation and Amortization (Accts. 403 - 407) - Depreciation and Amortization
4 expense was allocated in proportion to the total plant account assignments.

5 7. Property Taxes (Acct. 408) - Property Taxes are allocated to various accounts in the
6 general ledger. The COS, therefore, classifies these expenses as part of the other
7 general ledger accounts.

8 8. Other Taxes, Other Interest, and Other Deductions - Other Taxes, Other Interest, and
9 Other Deductions expenses are related to income taxes and have therefore been
10 classified as revenue-related.

11 9. Net Operating Income (Margin Requirement) - Since margin is comprised of interest
12 expense and debt service payments, which is a function of plant investment, it is
13 reasonable to classify this cost in proportion to the total plant assignments. This
14 approach most nearly parallels the method used to determine target margin
15 requirements (i.e., DSC method).

16 **Q. In the above you identify that distribution primary line and line transformer plant and**
17 **revenue requirements were classified as being capacity related. Can you please explain**
18 **this further?**

19 A. Yes. Often in retail COS studies, the plant and revenue requirements related to distribution
20 primary lines and line transformers is split between the Consumer and Capacity cost causative
21 categories. This is done utilizing either the minimum-size or zero-intercept method. Both
22 methods quantify the amount of plant and revenue requirement that is caused by simply having
23

24 ² Assigning 4.96 percent of A&G expenses to the transmission function mimics the allocation of the A&G in
25 the 34.5kV Formula-Based Rate as last approved by the Commission in the 18-SPEE-477-RTS Docket.

1 consumers, and that which is caused by serving the peak load requirements of those consumers.
2 Both methods are also contained in and described in the National Association of Regulatory
3 Utility Commissioners' (NARUC) Cost Allocation Manuals. This approach was considered
4 for this study; however, classifying a portion of distribution primary line and line transformer
5 plant and related revenue requirement to the Consumer component would show a very
6 significant under-recovery from the residential class and a very significant increase needed in
7 the residential monthly consumer charge. Although, in my opinion, this approach can be
8 supported and is appropriate for distribution utilities such as Southern Pioneer, the impact on
9 the results was determined to be too significant to implement at this time. To avoid this type
10 of an abrupt change, the regulatory concept of gradualism was employed, and distribution
11 primary line and line transformer plant and revenue requirement was classified fully to the
12 capacity component, which is consistent with prior studies submitted to the Commission in
13 Southern Pioneer rate applications. A gradual movement to the alternative, consumer-
14 weighted method may be considered in the future.

15 **Q. If the Class COS were to classify a portion of distribution plant and revenue requirement**
16 **as Consumer-related by using the minimum-size or zero-intercept method, how would**
17 **the results be affected?**

18 A. The results would end up allocating significantly more costs to relatively low capacity per
19 consumer rate classes (i.e., Residential) and away from high capacity per consumer classes
20 (i.e., General Service Large) and would indicate the need for a substantial increase in the
21 consumer related charge (i.e., Customer Charge) in Southern Pioneer's rate schedules.

22 **Q. Please discuss the allocation of the revenue requirement to rate classes.**

23 A. The allocation of the revenue requirement to each rate class is presented on page 18 of Exhibit
24 PSE-4. The allocations are based on various allocation factors that reflect certain cost
25

1 causative drivers as discussed below:

- 2 1. Direct Cost Allocation - Costs specifically associated with street or security lighting
3 facilities (investment and O&M) directly assigned to the Lighting Class are an example
4 of a Direct cost allocation.
- 5 2. Consumer Costs Allocations - Generally speaking, Consumer related costs were
6 allocated to the various classes based on the total number of consumers in each class.
7 However, several adjustments were made in the general allocation procedure to reflect
8 differences in the cost of providing basic service. Weighting factors were developed
9 on page 23 of Exhibit PSE-4 to recognize the higher cost of three-phase service versus
10 standard single-phase service for each subcategory of consumer related cost. A
11 “weighting factor” of 0.02 was used to allocate the consumer expense related to
12 providing basic service to an individual security or street light. Because these lights
13 make use of facilities and services which have been primarily provided for under other
14 rate schedules, it may be argued that it costs no more to prepare a bill for a consumer
15 with a security light than for one without. However, it seems only fair that the lighting
16 classes should be required to pay a token portion of the consumer related expense;
17 hence, the 0.02 weighting factor.
- 18 3. Capacity Cost Allocations - Three different allocation factors were developed for the
19 Capacity component. (See pages 24 to 27 of Exhibit PSE-4 for the development of
20 class demand allocators)³:
21
22
23

24 ³ Actual metered hourly data from the Company’s Advanced Metering Infrastructure (“AMI”) system was
25 used to develop class demands.

- 1 a. Line transformer capacity related costs were allocated in accordance with the non-
- 2 coincidental peak demand of each consumer in each class as this definition of
- 3 demand most closely approximates transformer capacity requirements.
- 4 b. Distribution primary line and substation capacity costs were allocated using the
- 5 average monthly non-coincidental class demand.
- 6 c. Purchased power demand charges were allocated in accordance with the average
- 7 monthly coincidental class demands by Summer and Winter season which is
- 8 consistent with how Southern Pioneer is billed for purchased capacity from its
- 9 power supplier.
- 10 d. Transmission capacity related costs were allocated using the non-coincidental class
- 11 demand.

- 12 4. Energy Cost Allocations - Energy related costs were allocated based on total energy
- 13 sales in each rate class adjusted for line loss.

14 Allocation factors for each category are developed on pages 28 and 29 of Exhibit PSE-4.

15 **Q. Please summarize the results of the retail Class COS study you performed for Southern**
16 **Pioneer.**

- 17 A. Results obtained from the Class COS analysis are summarized in Tables 1, 2, and 3 on the
- 18 following pages. Table 1 provides a comparison of the calculated cost of providing service to
- 19 each rate class with the revenue generated under the present rates by that class. The
- 20 “Difference” and “As Percent” columns in the table represent the amount by which present
- 21 rates would need to be adjusted to exactly align with the cost of service for each rate class.

22

23

24

25

Table 1
Retail Class Cost of Service Summary
Under Present Rates

Rate Class	Present Rate Revenue	Cost of Service	Difference	As Percent
	(\$)	(\$)	(\$)	(%)
Residential Service General Use 18-RS	16,003,561	17,527,740	1,524,179	9.5
Residential Space Heating 18-RS	797,668	909,511	111,844	14.0
General Service Small 18-GSS	1,868,895	1,927,675	58,779	3.1
General Service Large 18-GSL	17,615,005	16,156,340	(1,458,665)	(8.3)
General Service Space Heating Rider No 1	561,184	664,688	103,505	18.4
Industrial Service 18-IS	3,632,451	3,540,983	(91,468)	(2.5)
Municipal Power Service 18-M-I	200,559	239,654	39,095	19.5
Water Pumping Service 18-WP	652,696	639,129	(13,568)	(2.1)
Irrigation Service 18-IP-I	361,316	357,255	(4,062)	(1.1)
Temporary Service 18-CS	12,351	9,822	(2,529)	(20.5)
Lighting	1,116,717	846,621	(270,097)	(24.2)
TOTAL	42,822,404	42,819,417	(2,987)	

Table 2 shows a breakdown of the COS by cost category for each class.

Table 2
Class Allocation Summary

Rate Class	Power Supply		Transmission	Distribution		Total COS
	Capacity	Energy		Consumer	Capacity	
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
Residential Service General Use 18-RS	2,739,430	3,986,371	2,908,827	2,495,881	5,397,232	17,527,740
Residential Space Heating 18-RS	125,052	215,952	148,878	118,461	301,168	909,511
General Service Small 18-GSS	236,575	423,409	268,045	568,072	431,574	1,927,675
General Service Large 18-GSL	2,765,789	4,864,192	3,183,045	374,356	4,968,960	16,156,340
General Service Space Heating Rider No 1	109,865	187,003	127,891	16,214	223,716	664,688
Industrial Service 18-IS	557,257	1,136,847	640,904	14,388	1,191,586	3,540,983
Municipal Power Service 18-M-I	30,586	52,647	33,045	37,442	85,933	239,654
Water Pumping Service 18-WP	82,105	195,601	90,973	36,784	233,666	639,129
Irrigation Service 18-IP-I	57,550	87,932	50,379	21,378	140,016	357,255
Temporary Service 18-CS	1,300	1,873	1,572	1,200	3,877	9,822
Lighting	42,322	147,241	67,946	396,127	192,985	846,621
TOTAL	6,747,832	11,299,067	7,521,504	4,080,302	13,170,712	42,819,417

Table 3 provides total costs by class expressed in terms of \$/customer/month (consumer component) and ¢/kWh (capacity and energy components).

Table 3 Rate Design Factors						
Rate Class	Power Supply		Transmission	Distribution		Total COS
	Capacity	Energy		Consumer	Capacity	
	(¢/kWh)	(¢/kWh)	(¢/kWh)	(\$/mo.)	(¢/kWh)	(¢/kWh)
Residential Service General Use 18-RS	2.56	3.73	2.72	17.39	5.05	16.40
Residential Space Heating 18-RS	2.16	3.73	2.57	17.39	5.20	15.71
General Service Small 18-GSS	2.08	3.73	2.36	18.78	3.80	16.98
General Service Large 18-GSL	2.12	3.73	2.44	22.15	3.81	12.39
General Service Space Heating Rider No 1	2.19	3.73	2.55	22.15	4.46	13.26
Industrial Service 18-IS	1.83	3.73	2.10	70.88	3.91	11.62
Municipal Power Service 18-M-I	2.17	3.73	2.34	22.31	6.09	16.98
Water Pumping Service 18-WP	1.57	3.73	1.73	43.43	4.46	12.19
Irrigation Service 18-IP-I	2.44	3.73	2.14	43.45	5.94	15.15
Temporary Service 18-CS	2.59	3.73	3.13	17.39	7.72	19.56
Lighting	1.07	3.73	1.72	0.35	4.89	21.45
SYSTEM AVERAGE	2.23	3.73	2.48	14.28	4.35	14.13

Q. Please summarize your observations about the COS results.

A. As is typical, the Class COS study shows various level of cross-class subsidies between the rates. For the major revenue producing rate classes, the over or under recovery versus the Class COS is plus or minus 10 percent, while there are some “smaller” rate classes with variances greater than this. At this point, it is important to distinguish between the Class COS study and rate design -- the latter of which should consider not only the Class COS results but also other industry-accepted ratemaking principles.

PART IV - RATE DESIGN

Q. How should the results of a Class COS be applied?

A. It is vital to recognize some of the inherent limitations of a Class COS study. First, it must be emphasized that a Class COS analysis, while basically an engineering and economic

1 evaluation, is an art; not an exact science. There are many different methodologies, techniques,
2 and assumptions that have been and will continue to be advocated by rate analysts. Because
3 the various philosophies and assumptions can significantly affect the results of the analysis,
4 the results should be treated as providing an indication of the general range of class cost
5 responsibility; not as precise values.

6 Second, a Class COS analysis is of necessity directed at determining the cost imposed by
7 a rate class on the system rather than at determining the cost imposed by individual consumers
8 within each classification. The cost responsibility of a specific, individual consumer may or
9 may not be entirely consistent with the cost allocations made to their assigned consumer
10 classification. Furthermore, the study does not address the problem of maintaining relatively
11 smooth transitions between the various rate classes or subclasses of consumers which may be
12 eligible to receive service under more than one rate schedule.

13 Third, a Class COS analysis does not address itself to many of the other legitimate
14 objectives of rate design such as consumer acceptance or the avoidance of excessively abrupt
15 changes from the historical rate policies. In addition, it does not recognize the desire to keep
16 each rate schedule competitive, in as much as possible, with the corresponding rate schedule
17 of neighboring utilities or the need to keep the rate structure simple so that it is easily
18 administered and understood by consumers.

19 With the above limitations in mind, a Class COS study may be used as a general guide for
20 assigning cost responsibility (i.e., revenue requirements) to each of the rate classes in a manner
21 which avoids unjustifiable price discrimination. The study also provides information useful in
22 designing the individual rate schedules and provides support for justifying rate differentials to
23 retail customers.

24

25

1 **Q. What objectives have you considered in developing the proposed rates?**

2 A. There are many legitimate objectives that influence the design of rates. Some of the more
3 important ones are as follows:

- 4 1. The proposed rates must develop the requisite total revenue.
- 5 2. The proposed rates should reflect the cost of providing service. Subsidization between
6 classes or subclasses should be minimized if not eliminated.
- 7 3. The rate design should be simple and concise to facilitate consumer acceptance and
8 administration.
- 9 4. Abrupt departures from historical rate practices and levels should be avoided.
- 10 5. The rate structure should be acceptable to the ratepayers.
- 11 6. Where there is a possibility of a consumer being eligible to receive service under more
12 than one rate schedule, the transition should be made as smoothly as possible.
- 13 7. The rates should promote the efficient use of energy and system capacity.
- 14 8. Whenever possible, the rate schedule should be competitive with those of neighboring
15 utilities and alternative energy sources.

16 It is generally not possible to fully accomplish all the above objectives in developing rates.
17 Compromises must be made.

18 **Q. Are you testifying in support of any rate design requests in this application?**

19 A. Yes. I am testifying in support of rate design requests concerning the current rates and two
20 new rates. The new rates being requested are for light emitting diode (“LED”) rates and for a
21 Grid Access Charge (“GAC”) for consumers opting to participate in Southern Pioneer’s Net
22 Metering (“NM”) tariff.

23
24
25

A. Rate Change Request - Current Rates

Q. Please describe the rate design request concerning the current Southern Pioneer rates.

A. The request is for a three-year transition plan to address two major concepts -- both aimed at bringing rates closer in line with the Class COS, gradually. First, the rate changes during this transition period will help reduce the level of cross-class subsidies; second, the rate changes will improve the rate design to reduce the extent of intra-class subsidies. The transition plan is designed as revenue-neutral, which means that the total rate revenue to Southern Pioneer is the same throughout each year of the 3-year transition plan – assuming constant Test Year billing determinants.

Table 4 below shows the rate schedule revenue by rate class under the requested three-year transition plan.

Table 4 Proposed Rate Schedule Revenue				
Rate Class	Present Rates¹	Proposed Rates²		
		Year 1	Year 2	Year 3
	(\$)	(\$)	(\$)	(\$)
Residential Service (19-RS)				
General Use	16,002,466	16,174,693	16,346,921	16,519,148
Space Heating	797,613	805,788	813,962	822,136
General Service Small (19-GSS)	1,868,767	1,889,656	1,910,545	1,931,434
General Service Large (19-GSL)	17,613,799	17,410,495	17,207,190	17,003,886
General Service Space Heating (Rider No. 1)	561,145	561,145	561,145	561,145
Industrial Service (19-IS)	3,632,202	3,632,202	3,632,202	3,632,202
Industrial Service-Primary Discount	-	-	-	-
Real -Time Pricing (13-RTP)	33,528	33,528	33,528	33,528
Transmission Level Service (18-STR)	26,258,290	26,258,290	26,258,290	26,258,290
Municipal Power Service (19-M-I)	200,545	202,559	204,573	206,586
Water Pumping Service (19-WP)	652,651	652,651	652,651	652,651
Irrigation Service (19-IP-I)	361,292	361,292	361,292	361,292
Temporary Service (19-CS)	12,350	12,350	12,350	12,350
Lighting	1,116,641	1,116,641	1,116,641	1,116,641
Total Retail Rates	69,111,289	69,111,289	69,111,289	69,111,289
Local Access Delivery Service	2,142,184	2,142,184	2,142,184	2,142,184
Total All Rates	71,253,473	71,253,473	71,253,473	71,253,473

As shown in Table 4, the total revenue from retail rates is the same across all years of the proposed rate transition plan. Table 5 below shows the change in revenue by rate class. Notice that while some rates are increasing, others decrease so that there is no net change in rate schedule revenue; again, this is also illustrated in Table 4.

Table 5			
Change in Rate Schedule Revenue			
Rate Class	Annual Revenue Change		
	Year 1	Year 2	Year 3
	(\$)	(\$)	(\$)
Residential Service (19-RS)			
General Use	172,228	172,228	172,228
Space Heating	8,174	8,174	8,174
General Service Small (19-GSS)	20,889	20,889	20,889
General Service Large (19-GSL)	(203,304)	(203,304)	(203,304)
General Service Space Heating (Rider No. 1)	-	-	-
Industrial Service (19-IS)	-	-	-
Industrial Service-Primary Discount	-	-	-
Real -Time Pricing (13-RTP)	-	-	-
Transmission Level Service (18-STR)	-	-	-
Municipal Power Service (19-M-I)	2,014	2,014	2,014
Water Pumping Service (19-WP)	-	-	-
Irrigation Service (19-IP-I)	-	-	-
Temporary Service (19-CS)	-	-	-
Lighting	-	-	-
Total Retail Rates	-	-	-
Local Access Delivery Service	-	-	-
Total All Rates	-	-	-

Q. Is it correct from Table 5 above that the request is for an increase in the Residential Service (“RS”), General Service Small (“GSS”), and Municipal Power Service (“M-I”) rates and a corresponding decrease to the General Service Large (“GSL”) rate?

A. Yes. The Class COS results, as previously discussed, do show that relative to the allocated cost of providing service, the RS, GSS, and M-I rates are currently under-recovering, while the GSL rate is over-recovering. Resolving issues like this can be challenging, especially when

1 there is not an overall rate change being requested. The three-year rate transition plan, while
2 it does not completely resolve the issue due to a desire to avoid rate shock, does move the rates
3 and rate designs closer to the Class COS results which will improve fairness and price signals.

4 **Q. What rate design changes are being requested for the RS rate?**

5 A. The RS rate, according to the Class COS, has a Customer Charge that is too low. The Customer
6 Charge is currently only \$13.77 per month; whereas the Class COS shows a consumer-related
7 cost of \$17.39 per month. I would also point out again that this is also using a Class COS
8 methodology (as was previously discussed) that produces a relatively low consumer-related
9 cost.⁴ The three-year transition plan will gradually move the present Customer Charge up to
10 the Class COS result in equal steps. Each step will increase the Customer Charge by \$1.20 per
11 month until the charge gets to \$17.37 per month -- which is barely short of the \$17.39
12 consumer-related cost in the Class COS for the RS class. No other rate design changes are
13 being requested for the RS rate.

14 **Q. What is the bill impact from the requested RS rate?**

15 A. As noted, the three-year transition plan includes a \$1.20 per month increase in the Customer
16 Charge for each of the next three years. Because there are no other changes requested for this
17 rate, that \$1.20 per month is the total bill impact of this request. This makes the change easy
18 to communicate, explain, and implement while being predictable for customers. It also is
19 somewhat certain for both Southern Pioneer and the customer since it will not fluctuate with
20 the sales/consumption which can be volatile due to weather.

24 ⁴ The cost per month would be much higher using one of the alternative Class COS
25 methodologies previously described.

1 **Q. What rate design changes are being requested for the GSS rate?**

2 A. The request for the GSS rate is to increase the Energy Charge (a.k.a., Delivery Charge).
3 According to the Class COS, the Customer Charge is adequate at its current level; and the
4 Energy Charge is under-recovering. Increasing the Energy Charge in equal steps represents a
5 gradual change that will have relatively minor bill impacts. The bill impacts will depend on
6 the level of usage; but at the average usage level of 210 kWh per month, it amounts to less than
7 \$0.40 per month.

8 **Q. What rate design changes are being requested for the M-I rate?**

9 A. The M-I rate currently adopts the RS Customer Charge -- and the request is to continue this
10 such that the Customer Charge increases requested for the RS rate would also apply to the M-
11 I rate. Beyond this, no other rate changes are requested for the M-I rate.

12 **Q. What rate design changes are being requested for the GSL rate?**

13 A. According to the Class COS, the GSL rate is over-recovering; and the request is for a decrease
14 that will offset the increases from the other rates. The Class COS also indicates that the Energy
15 Charge (a.k.a., Delivery Charge) is high relative to the cost. This means that the rate is over-
16 recovering from customers that use a large amount of energy relative to their demand (i.e.,
17 high load factor customers). A gradual reduction of the Energy Charge is requested and will
18 relieve these customers somewhat and will help make the rate more attractive to industry with
19 high load factors. All GSL customers will experience a bill reduction from the requested
20 change; however, those with higher load factors will experience a somewhat larger percentage
21 reduction.

22

23

24

25

1 **Q. You also mentioned that Southern Pioneer is requesting two new rates or charges. Please**
2 **explain further.**

3 A. First, the Company is requesting that the Commission approve rates that it can use to serve
4 LED lighting being deployed for customers in its service areas. Second, Southern Pioneer is
5 requesting the Commission approve an update to its NM to include the addition of the GAC
6 that would be applicable to customers that decide in the future to install behind the meter
7 distributed generation (“DG”) facilities.

8 **B. Rate Change Request - LED Lighting**

9 **Q. The first request you identified is for the Commission to approve rates that Southern**
10 **Pioneer can use to serve LED lighting. Please explain.**

11 A. Southern Pioneer, along with most electric utilities across the country, provides electric service
12 to various types of outdoor lighting such as security and street lighting. Lighting technologies
13 have changed over the years; currently, most electric utilities are increasingly serving LED
14 lights. LED lights have a variety of benefits over existing Mercury Vapor (“MV”), High
15 Pressure Sodium (“HPS”), or Metal Halide (“MH”) technologies, at least for certain
16 applications. This includes lower energy usage per lumen and a longer bulb life (i.e., hours).
17 While the upfront price to purchase an LED light remains somewhat higher than the other
18 technologies, those prices have dropped significantly. Southern Pioneer’s lighting rates are
19 based upon serving MV and HPS lights. It is therefore recommending a new set of lighting
20 rates that it can use to serve various sizes of LED lights to accommodate the preferences of its
21 customers.

22 **Q. How is Southern Pioneer proposing to price service provided to LED lights?**

23 A. The LED lighting for private area and cobra head street lighting would be priced at the rates
24 currently in place for the equivalent HPS lights. The rate is applied as a monthly charge based
25

1 upon the wattage of the lights. The wattage of the lights is directly related to the cost of serving
 2 the lights.

3 In order to establish the rates for LED lights, a separate cost analysis was prepared. (Please
 4 reference Exhibit PSE-5 for the details and analysis). This LED lighting analysis utilizes the
 5 Class COS results and accounts for the difference in cost for the lights and the lower energy
 6 requirements. The LED Cost column in the following Table 6 below, shows the calculated
 7 costs for LED equivalent lights. As shown, there is not a significant difference between the
 8 rates calculated for LED and the current lighting rates being billed.

9

10

11

Table 6
Southern Pioneer Electric Company
LED Lighting Analysis - Summary

Light Type	HPS Equivalent	LED Cost ¹	Proposed HPS Tariff Rate ¹	Proposed LED Tariff Rate ¹
48 W LED - Existing Pole	100 W HPS	\$ 12.74	\$ 12.09	\$ 12.09
108 W LED - Existing Pole	200 W HPS	\$ 18.69	\$ 19.92	\$ 19.92
215 W LED - Existing Pole	400 W HPS	\$ 30.88	\$ 28.27	\$ 28.27
48 W LED - New Wood Pole ²	100 W HPS		\$ 19.33	\$ 19.33
108 W LED - New Wood Pole ²	200 W HPS		\$ 26.28	\$ 26.28
215 W LED - New Wood Pole ²	400 W HPS		\$ 35.60	\$ 35.60
108 W LED - New Steel Pole ²	200 W HPS		\$ 39.02	\$ 39.02
215 W LED - New Steel Pole ²	400 W HPS		\$ 49.85	\$ 49.85

12

13

14

15

16

17

18 ¹ Per light, excluding ECA and PTS and assuming company-owned lights.
² Incremental cost of new Wood or Steel Pole is assumed to be the same for either LED or HPS lights

19

20

21 The LED lighting that would replace MH and HPS lights currently used for flood lighting has
 22 a calculated cost that is considerably lower than the current or proposed flood lighting rates as is
 23 illustrated in Table 7 below. It is therefore recommended that the Proposed LED Tariff Rate be
 24 based on the LED Cost as calculated.

25

Table 7 Southern Pioneer Electric Company LED Flood Lighting Analysis - Summary				
Light Type	HPS/MH Equivalent	LED Cost ¹	Proposed HPS Tariff Rate ¹	Proposed LED Tariff Rate ¹
43 W LED - Existing Pole	150 W HPS	\$ 15.34	\$ 22.28	\$ 15.34
140 W LED - Existing Pole	400 W HPS	\$ 22.48	\$ 42.42	\$ 22.48
459 W LED - Existing Pole	1000 W MH	\$ 44.49	\$ 67.56	\$ 44.49
43 W LED - New Wood Pole ²	150 W HPS		\$ 24.92	\$ 17.98
140 W LED - New Wood Pole ²	400 W HPS		\$ 44.47	\$ 24.53
459 W LED - New Wood Pole ²	1000 W MH		\$ 87.41	\$ 64.34

¹ Per light, excluding ECA and PTS and assuming company-owned lights.
² Incremental cost of new Wood or Steel Pole is assumed to be the same for either LED or HPS lights

C. Rate Change Request - Grid Access Charge

Q. The second request you identified is for a charge that would be applicable to Southern Pioneer NM tariff customers. Please explain.

A. Correct. The requested GAC would apply to Southern Pioneer’s customers that install a DG system in the future -- so there would be no Test Year revenue impact to the Company for this change and no immediate impact of the GAC on Southern Pioneer’s current customers served under its NM tariff. Concerning existing customers on the NM tariff, Southern Pioneer is proposing to grandfather them such that the GAC will not apply to them until January 1, 2030, or to the extent permitted by law, which is consistent with the Commission’s directive in Docket No. 16-GIME-403-GIE. ⁵

The goal of this request is not revenue driven. Instead, it serves the following purposes:
 1) to provide a price signal to customers that may be evaluating DG investment in the future and 2) to ensure that customer installations of DG do not negatively affect the costs borne by customers that do not install DG.

⁵ Final Order, ¶ 29 (issued Sept. 21, 2017).

Q. What is the requested GAC and how will it be applied?

A. The GAC will be charged per kW of installed DG capacity in addition to base tariff charges and at the rates shown in Table 8 below for each applicable rate schedule.

Table 8							
DG Grid Access Charge - Summary							
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
Line	Description	Residential General Service (18-RS)	General Service Small (18-GSS)	General Service Large (18-GSL)	Industrial Service (18-IS)	Irrigation (18-IP-I)	Notes
1	Grid Access Charge						
2	Year 1	\$ 7.36	\$ 4.97	\$ 1.89	\$ 1.36	\$ 4.79	per kW (DC)
3	Year 2	\$ 7.36	\$ 5.21	\$ 1.89	\$ 1.36	\$ 4.79	per kW (DC)
4	Year 3	\$ 7.36	\$ 5.42	\$ 1.89	\$ 1.36	\$ 4.79	per kW (DC)
5	Not-to-Exceed *	\$ -	\$ -	\$ -	\$ -	\$ -	
6	Year 1	\$ 41.00	\$ 14.00	\$ 110.00	\$ 1,540.00	\$ 173.00	per month
7	Year 2	\$ 41.00	\$ 15.00	\$ 110.00	\$ 1,540.00	\$ 173.00	per month
8	Year 3	\$ 41.00	\$ 15.00	\$ 110.00	\$ 1,540.00	\$ 173.00	per month
* Equivalent to 5.6 kW DG installation for RS, 2.8 kW for GSS, 58.1 kW for GSL, 1,129.9 kW for IS, 36.1 kW for IP (DC)							

For example, if a residential customer installs a 6 kW solar array (which is a typical size for a residential customer), in Year 1 of the three-year transition plan, they would be billed a GAC determined as follows:

1. 6 kW DC solar array x \$7.36 GAC per kW DC GAC = \$44.16 charge.
2. Not-to-Exceed amount for residential of \$41.00 per month.
3. Residential DG customer billed \$41.00 for GAC.

Q. How does the requested GAC provide a price signal to customers that may be evaluating an investment in a DG system?

A. As will be discussed further, Southern Pioneer incurs significant costs to own, operate, and maintain the grid (i.e., sub transmission and distribution systems). Consistent with long-standing, industry-accepted, cost of service principles, these costs exist based upon 1) the number and location of customers served (i.e., customer-related) and/or 2) the peak

1 capacity/demand requirements of the grid. So, if a customer installs DG and thus reduces the
2 amount of energy that Southern Pioneer delivers over its grid, the cost of the grid itself is not
3 affected (i.e., is not reduced, stays the same). Southern Pioneer's current rate structure does
4 not adequately convey this since it collects some or all demand-related fixed costs in an energy
5 charge. Separating the fixed, demand-related costs into a GAC is a way to correct for this
6 without making an abrupt change to the other rates which could affect thousands of customers.

7 **Q. How does the requested GAC address cost shifting that could otherwise result from**
8 **servicing residential DG customers under a two-part (i.e., Customer Charge and Energy**
9 **Charge) rate structure?**

10 A. As the Commission stated in its Docket No. 16-GIME-403-GIE Final Order,

11 "22. Second, the Commission finds the current two-part residential rate design is
12 problematic for utilities and residential private DG customers because DG
13 customers use the electric grid as a backup system resulting in their consuming
14 less energy than non-DG customers, which results in DG customers not paying
15 the same proportion of fixed costs as non-DG customers.⁶⁰ The Commission finds
16 DG customers are thus being subsidized by non-DG customers.⁶¹

17 23. Third, the Commission finds the following rate design options are appropriate
18 for residential private DG customers, to allow utilities to better recover the costs
19 of providing service to that class or sub-class of customers:

- 20 a. A cost of service based three-part rate consisting of a customer charge,
21 demand charge, and energy charge;⁶²
- 22 b. A grid charge based upon either the DG output or nameplate rating;⁶³
23 or
- 24 c. A cost of service-based customer charge that is tiered based upon a
25 customer's capacity requirements.⁶⁴"

(pages 8-9 of referenced Commission Order)

To resolve this subsidy finding by the Commission, the GAC is calculated to recover the fixed
costs of Southern Pioneer that would not otherwise be paid by DG customers under the existing
and proposed rate design. I have set this out in Exhibit PSE-6.

The calculation of the GAC is to identify the distribution fixed costs that are not being
collected by Southern Pioneer's fixed or demand charges. This is done by calculating the

1 annual distribution fixed costs being recovered under each of the applicable rate tariffs and
2 then subtracting the revenues from the Customer and Demand Charges.⁶ The difference is the
3 amount of distribution fixed costs that are, by design, being recovered through the variable
4 energy rate component(s). This dollar amount is divided by the annual sales to arrive at the \$
5 per kWh rate. This result is then converted to a \$ per kW DC GAC charge by applying the DG
6 capacity factor.

7 **Q. Could Southern Pioneer have corrected the price signal for DG by some other means?**

8 A. In my opinion, currently, there is not a better option for dealing with Southern Pioneer's
9 concerns regarding fairness to all customers and providing a better price signal to customers
10 that consider installing DG. I have worked with other utilities on this issue on dozens of
11 occasions as they are also dealing with this issue of fairness, cost recovery, and price signals
12 in their rate design. The potential alternatives available include: 1) creating a separate rate
13 class for DG customers or 2) changing the rate design for all customers. Neither of these are
14 very good options for Southern Pioneer, and I can understand why the GAC is preferred.

15 The first option of separating DG customers into their own rate class(es) is problematic
16 because, for the Test Year, there were only five customers with DG in the Test Year, with four
17 of them being residential and one being small general service. Creating a separate rate class
18 for four or one customer is not common practice. The resulting rate or costs would be very
19 specific to the cost and usage characteristics of those few customers and may not be appropriate
20 to additional customers that may be added to the rate in the future.

21 Changing the rate design for all customers is something that could be considered.
22 However, such a change would likely include either a substantial increase to the Customer
23

24 ⁶ Southern Pioneer's General Service Large, Industrial, and Irrigation rate tariffs have a demand charge which
25 assists in the collection of fixed costs. The calculation therefore reduces the fixed costs that would otherwise
go into the determination of the GAC for these rate classifications.

1 Charge and/or the addition/increase of a Demand Charge. Either of these would provide a
2 better price signal related to fixed and demand cost recovery; however, it could cause “rate
3 shock” for thousands of customers.

4 The requested GAC balances many objectives and provides the following benefits:

- 5 1. No immediate impact on existing DG customers.
- 6 2. No immediate impact on Southern Pioneer’s revenues.
- 7 3. Provides a better price signal to customers to support DG investment decisions while
8 avoiding a dramatic rate design change, such as increased Fixed Charge or
9 additional/increased Demand Charge.
- 10 4. Avoids the risks of developing a DG-specific rate based upon a few customers.
- 11 5. Protects against cost-shifting that would otherwise occur from DG installations under
12 Southern Pioneer’s existing rates structures, such as the two-part rate structure used to
13 serve customers under its residential and small commercial service rates.
- 14 6. Is a simple and stable rate approach.

15 **Q. Does this conclude your Direct Testimony?**

16 A. Yes, it does.

17
18
19
20
21
22
23
24
25

RICHARD J. MACKÉ

VICE PRESIDENT, ECONOMICS, RATES, AND BUSINESS PLANNING

SUMMARY OF EXPERIENCE AND EXPERTISE

- Over 23 years of experience in electric utility consulting.
- Specialized expertise in financial advisement with particular emphasis on: cost of service analyses, wholesale and retail rate design, strategic planning, mergers and acquisitions, and financial modeling.
- Frequent speaker at industry events and utility board, commission, and staff meetings.
- Expert witness in regulatory cases concerning rates and distributed generation policies.

PROFESSIONAL EXPERIENCE

Power System Engineering, Inc. - Minneapolis, MN (1999-present)

Vice President, Economics, Rates, and Business Planning (June 2011-present)

Vice President, Rates and Financial Planning (July 2010-May 2011)

Various Other Positions (1999-June 2010)

As Vice President of the Economics, Rates, and Business Planning Department at PSE, responsibilities include managing the firm's economic and rate practice areas and providing senior level consulting services to clients in the areas of cost of service, rate design, financial planning and forecasting, merger and acquisition analysis, and support. Additional responsibilities include strategic planning, litigation support, expert witness, regulatory compliance, capital expenditure, and operational assessments and advisement.

Energy & Resource Consulting Group, LLC - Denver, CO (1998-1999)

Senior Analyst

Senior Analyst for financial, engineering, and management consulting firm. Performed consulting services related to electric, gas, and water rate studies. Part of the Financial and Engineering Advisor Team contracted to the City Council of the City of New Orleans, LA to assist in various electric and gas utility matters. Provided expert testimony and participated in various regulatory proceedings involving the City Council, the Public Utilities Commission of Texas, and the Public Utilities Commission of Nevada. Provided general financial, management, and public policy support to clients.

Power System Engineering, Inc. - Blaine, MN (1996-1998)

Financial Analyst

Financial Analyst in Utility Planning and Rates Division. Emphasis on retail rate studies, including revenue requirements, and bundled/unbundled cost of service studies. Provided analysis used to support testimony, mergers and acquisitions cases, and financial forecasting.

RICHARD J. MACKE

EDUCATION

University of Minnesota, Minneapolis, MN
 Masters of Business Administration, 2007
 Bethel University, St. Paul, MN
 Bachelor of Arts Degree in Business, Minor in Economics, 1996

PRESENTATIONS AND PUBLICATIONS

Presentations at Industry Meetings

Topic	Organization	Conference	Location	Date
<i>Legislative Interim Study Committee</i>				
<i>Trends in Rate Design - Panel</i>	Minnesota Rural Electric Association	2019 Energy Issues Summit	St. Cloud, MN	7/2019
<i>Electric Vehicle Development and Rate Trends</i>	Iowa Association of Electric Cooperatives	2019 Accountants Conference	Des Moines, IA	5/2019
<i>Electric Vehicle Development and Rate Trends</i>	Iowa Association of Electric Cooperatives	2019 CEO Conference	Des Moines, IA	4/2019
<i>Cost of Service and Rate Design Seminar</i>	PSE/Minnesota Rural Electric Association	Spring 2018 Seminar	Bloomington, MN	4/2018
<i>Cost of Service and Rate Design Seminar</i>	PSE/Kansas Electric Cooperatives	Fall 2017 Seminar	Salina, KS	10/2017
<i>Evolving Rate Structures</i>	Wisconsin Electric Cooperative Assoc.	Fall Manager's Meeting	Wisconsin Dells, WI	10/2017
<i>Rate Design and Cost of Service Seminar</i>	PSE/KEC	Fall 2017 Seminar	Salina, KS	10/2017
<i>Cost of Service: Transforming Theory into Reality</i>	APPA	Business and Finance Conference	Nashville, TN	9/2017
<i>Anti-Demand Charges: The Case for Peak-Time Rebate (PTR) Programs</i>	EUCI	Residential Demand Charges Conference	Charleston, SC	7/2017
<i>Power Cost Adjustment (PCA)</i>	Iowa Association of Electric Cooperatives	Managers and Board President's Summer Conference	Okoboji, IA	7/2017
<i>Distributed Generation Rate Design</i>	Kansas Rural Electric Cooperatives	Manager's Association Spring Meeting	Wichita, KS	6/2017
<i>NEM Policy Update and DG Rate Design</i>	Kansas Electric Cooperatives, Inc.	Regulatory Review and Tax Committee	Salina, KS	3/2017
<i>Rate Impact of Net Metering</i>	Generation and Transmission Finance and Accountants Assoc.	G&T Finance and Accounting Conference	Charleston, SC	6/2016
<i>Net Metering and Fixed Cost Recovery</i>	Iowa Association of Electric Cooperatives	Manager's Spring Conference	Des Moines, IA	4/2016
<i>Net Metering Deep Dive</i>	Minnesota Rural Electric Assoc.	Annual Meeting	St. Paul, MN	3/2016
<i>Retail Rate Design and Industry Update</i>	Association of Missouri Electric Cooperatives	Manager's Fall Conference	Branson, MO	9/2015
<i>Rate Design and Cost of Service Seminar</i>	Power System Engineering, Inc.	Fall 2015 Seminar	Lexington, KY	9/2015

RICHARD J. MACKE

<i>Distributed Generation WI Survey Results</i>	Dairyland Power Cooperative	Solar Workshop	Plover, WI	9/2015
<i>Consumer-Owned Generation</i>	Hoosier Energy	2015 Board Strategic Issues Forum	French Lick, IN	8/2015
<i>Retail Rate Design and DG</i>	National Rural Electric Cooperative Assoc.	CEO Close-Up Conference	St. Petersburg, FL	1/2015
<i>Evolution of Retail Rate Design</i>	National Rural Electric Cooperative Assoc.	NRECA Issues Summit	Indianapolis, IN	10/2014
<i>Net Metering and Retail Rate Design</i>	Kansas Electric Cooperatives	Accountant's Meeting	Wichita, KS	10/2014
<i>DG Rate Considerations</i>	Wisconsin Electric Cooperative Assoc.	Emerging Energy Issues Summit	Wisconsin	8/2014
<i>Rate Design and Cost of Service Seminar</i>	Power System Engineering, Inc.	Spring 2014 Seminar	Indianapolis, IN	5/2014
<i>Rate Trends and Facilities Charges</i>	South Dakota Rural Electric Assoc.	Accountant's Fall Conference	Mitchell, SD	10/2013
<i>Rate Design and Cost of Service Seminar</i>	Power System Engineering, Inc.	Fall 2013 Seminar	Bloomington, MN	10/2013
<i>Tackling New Trends in Rates and Facilities Charges</i>	Rural Electric Managers Assoc.	Fall Financial Manager's Conf.	Duluth, MN	8/2013
<i>Dynamic Pricing</i>	National Rural Electric Cooperative Assoc.	Accounting, Finance and Tax Meeting	New Orleans, LA	7/2013
<i>Rate Trends</i>	Wisconsin Electric Cooperative Assoc.	Manager's Meeting	Warrens, WI	7/2013
<i>Standby Rates</i>	Iowa Association of Electric Cooperatives	Manager's Spring Conference	Des Moines, IA	4/2013

Publications

- Macke, Richard; Butz, Thomas; and Sonju, Erik. "Distributed Energy Resources: Trends and Impacts on G&Ts and Their Member Cooperatives." National Rural Electric Association, July 2019.
- Macke, Richard and Butz, Thomas. "The Value of Distributed Solar Generation." National Rural Electric Association, 2016.
- Mbiad, Garry and Macke, Richard. "Cooperative Rate Structures - Seven Case Studies." National Rural Electric Association, 2016.
- Macke, Richard. "Survey: Electric Cooperative Fixed Cost Recovery." Power System Engineering, Inc., 2014.
- Mbiad, Garry and Macke, Richard. "NRECA Cooperative Solar Case Studies." National Rural Electric Association, 2014.
- Macke, Richard. "G&T DER Whitepaper." Power System Engineering, Inc., 2013.
- Macke, Richard, Fenrick, Steve, and Getachew, Lullit. "Performance Based Regulation for Electric and Gas Distributors." Power System Engineering, Inc., 2011.

RICHARD J. MACKE

EXPERT TESTIMONY

Case or Jurisdiction	Docket No.	Description
Kansas	18-SPEE-477-RTS	Southern Pioneer Electric Company, Annual Filing for approval to make certain changes to its charges for electric services, pursuant to the Debt Service Coverage Formula Based Ratemaking Plan approved in Docket No. 13-MKEE-452-MIS and 34.5kV Formula Based Ratemaking Plan approved in Docket No. 16-MKEE-023-TAR. Testimony filed on behalf of Southern Pioneer.
Kansas	16-GIME-403-GIE	Kansas Electric Cooperatives and Southern Pioneer Electric Company, in the matter of the General Investigation to Examine Issues Surrounding Rate Design for Distributed Generation Customers. Testimony filed in support of Stipulation and Agreement on behalf of both entities.
Kansas	16-PLCE-490-TAR	Prairie Land Electric Cooperative, Inc., application for approval to update its Local Access Delivery Service Tariff pursuant to the 34.5kV Formula Based Rate Plan approved in Docket No. 16-MKEE-023-TAR. Testimony filed on behalf of Prairie Land.
Kansas	16-SPEE-501-TAR	Southern Pioneer Electric Company, Annual Filing for approval to make certain changes to its charges for electric services pursuant to the 34.5kV Formula Based Rate Plan approved in Docket No. 16-MKEE-023-TAR. Testimony filed on behalf of Southern Pioneer.
Kansas	16-VICE-494-TAR	The Victory Electric Cooperative Association, Inc., application for approval to update its Local Access Delivery Service Tariff pursuant to the 34.5kV Formula Based Rate Plan approved in Docket No. 16-MKEE-023-TAR. Testimony filed on behalf of Victory.
Kansas	16-WSTE-496-TAR	Western Cooperative Electric Association, Inc., application for approval to update its Local Access Delivery Service Tariff pursuant to the 34.5kV Formula Based Rate Plan approved in Docket No. 16-MKEE-023-TAR. Testimony filed on behalf of Western.
Kansas	16-MKEE-023-TAR	Mid-Kansas Electric Company, application for approval of individual 34.5kV formula-based rates. Testimony filed on behalf of Mid-Kansas, Southern Pioneer, Victory, and Western.
Kansas	15-SPEE-519-RTS	Southern Pioneer Electric Company, Annual Filing for approval to make certain changes to its charges for electric services, pursuant to the Debt Service Coverage Formula Based Ratemaking Plan approved in Docket No. 13-MKEE-452-MIS. Testimony filed on behalf of Southern Pioneer.
Kansas	15-SPEE-161-RTS	Southern Pioneer Electric Company, application for approval to make certain changes to its Local Access Charge Rate. Testimony filed on behalf of Southern Pioneer.
Kansas	14-SPEE-507-RTS	Southern Pioneer Electric Company, Annual Filing for approval to make certain changes to its charges for electric services pursuant to the Debt Service Coverage Formula Based Ratemaking Plan Approved in Docket No. 13-MKEE-452-MIS. Testimony filed on behalf of Southern

RICHARD J. MACKE

		Pioneer.
Kansas	13-MKKEE-452-MIS	Mid-Kansas Electric Company, LLC, application for approval of a Debt Service Coverage Ratemaking Pilot Plan. Testimony filed on behalf of its member-owner, Southern Pioneer Electric Company.
Kansas	11-MKKEE-380-RTS	Mid-Kansas Electric Company, LLC, application for revised rates, tariffs, and rate design changes. Testimony filed on behalf of its member-owner, Southern Pioneer Electric Company.
Kansas	11-MKKEE-491-RTS	Mid-Kansas Electric Company, LLC, application for revised rates, tariffs, and rate design changes. Testimony filed on behalf of its member-owner, Western Cooperative Electric Assn., Inc.
Kansas	11-MKKEE-439-RTS	Mid-Kansas Electric Company, LLC, application for revised rates, tariffs, and rate design changes. Testimony filed on behalf of its member-owner, Wheatland Electric Cooperative, Inc.
Kansas	09-MKKEE-969-RTS	Mid-Kansas Electric Company, LLC, application for approval to make certain changes in the charges for electric services. Testimony filed on behalf of Mid-Kansas and its member-owners: Lane-Scott Electric Cooperative, Inc.; Prairie Land Electric Cooperative, Inc.; Southern Pioneer Electric Company; Victory Electric Cooperative Association, Inc.; Western Cooperative Electric Association, Inc.; and Wheatland Electric Cooperative, Inc.
Kansas	09-PNRE-563-RTS	Pioneer Electric Cooperative, Inc., application to increase rates. Testimony filed on behalf of Pioneer.
Kansas	09-WHLE-681-RTS	Wheatland Electric Cooperative, Inc., application to increase rates. Testimony filed on behalf of Wheatland.
Kentucky	2016-00365	Farmers Rural Electric Cooperative Corporation, application for matter of adjustment of rates. Testimony filed on behalf of Farmers.
Maryland	S.B. 771	Testified before Maryland State Senate in support of Senate Bill 771.
Maryland	H.B. 996	Testified before Maryland House of Delegates in support of House Bill 996.
Minnesota	E-111/GR-03-261	Dakota Electric Association, application to increase rates. Testimony filed on behalf of Dakota.
South Carolina	2014-246-E	Testimony in support of the Settlement Agreement submitted by the parties to the Commission as the generic net metering methodology required by S.C. Code §58-40- 20(F)(4) of Act 236 on behalf of Central Electric Power Cooperative, Inc. and the Electric Cooperatives of South Carolina.
South Dakota	Regarding Senate Bill 66	South Dakota Legislative Interim Study Committee - Electric Services in an Annexed Area. Presented oral testimony to the Legislative Committee at August 28, 2019 meeting. Testimony on behalf of South Dakota Rural Electric Association.
Texas	2150	North Star Steel, appropriateness of settlement rates being charged by Entergy Gulf States, Inc. Testimony filed on behalf of North Star Steel before the Public Utilities Commission of Texas.

**Cost of Service Summary
Revenue Requirements Summary -- BUNDLED**

Line No.	Description	Total	Residential Service General Use 18-RS	Residential Space Heating 18-RS	General Service Small 18-GSS	General Service Large 18-GSL	General Service Space Heating Rider No 1	Industrial Service 18-IS	Municipal Power Service 18-M-I	Water Pumping Service 18-WP	Irrigation Service 18-IP-I	Temporary Service 18-CS	Lighting
1	Revenue Requirements												
2	Revenue Requirements	42,819,417	17,531,674	909,744	1,928,483	16,151,815	664,716	3,540,287	239,747	639,130	357,274	9,822	846,724
3													
4	Present Rates												
5	Revenue-Present Rates	42,819,472	16,002,466	797,613	1,868,767	17,613,799	561,145	3,632,202	200,545	652,651	361,292	12,350	1,116,641
6	Revenue Credits	2,932	1,096	55	128	1,206	38	249	14	45	25	1	76
8		42,822,404	16,003,561	797,668	1,868,895	17,615,005	561,184	3,632,451	200,559	652,696	361,316	12,351	1,116,717
9													
10	Difference	(2,987)	1,528,113	112,076	59,588	(1,463,190)	103,532	(92,164)	39,188	(13,566)	(4,042)	(2,529)	(269,993)
11	As Percent of Rate Schedule Revenue		9.55%	14.05%	3.19%	(8.31%)	18.45%	(2.54%)	19.54%	(2.08%)	(1.12%)	(20.48%)	(24.18%)
12													

Cost of Service Summary
Class Allocation Summary -- BUNDLED

Line No.	Category	Total	Residential Service General Use 18-RS	Residential Space Heating 18-RS	General Service Small 18-GSS	General Service Large 18-GSL	General Service Space Heating Rider No 1	Industrial Service 18-IS	Municipal Power Service 18-M-I	Water Pumping Service 18-WP	Irrigation Service 18-IP-I	Temporary Service 18-CS	Lighting
13	Power Supply												
14	Direct												
15	Wholesale Cost												
16	Allocated Cost												
17	Subtotal												
18	Capacity Related												
19	Wholesale Cost	6,648,636	2,699,160	123,213	233,097	2,725,131	108,250	549,066	30,137	80,898	56,704	1,281	41,700
20	Allocated Cost	100,928	40,974	1,870	3,538	41,368	1,643	8,335	457	1,228	861	19	633
21	Subtotal	6,749,564	2,740,133	125,084	236,635	2,766,499	109,893	557,401	30,594	82,126	57,565	1,301	42,333
22	Energy Related												
23	Wholesale Cost	11,132,967	3,927,770	212,778	417,185	4,792,686	184,254	1,120,135	51,873	192,725	86,639	1,845	145,076
24	Allocated Cost	169,001	59,624	3,230	6,333	72,754	2,797	17,004	787	2,926	1,315	28	2,202
25	Subtotal	11,301,968	3,987,395	216,008	423,518	4,865,440	187,051	1,137,139	52,661	195,651	87,955	1,873	147,279
26	Sub. Power Supply	18,051,532	6,727,528	341,092	660,153	7,631,939	296,944	1,694,539	83,255	277,777	145,519	3,174	189,612
27	Transmission												
28	Direct												
29	Capacity	4,365,670	1,688,356	86,413	155,580	1,847,519	74,231	371,997	19,180	52,803	29,241	912	39,437
30	Energy												
31	Allocated Cost	3,158,133	1,221,360	62,511	112,547	1,336,499	53,699	269,103	13,875	38,198	21,153	660	28,529
32	Sub. Transmission	7,523,803	2,909,716	148,924	268,127	3,184,018	127,930	641,100	33,055	91,000	50,394	1,573	67,966
33	Distribution												
34	Direct	376,772											376,772
35	Consumer	3,715,492	2,503,429	118,820	569,787	375,485	16,263	14,433	37,556	36,898	21,444	1,204	20,174
36	Capacity	13,151,818	5,391,002	300,909	430,415	4,960,373	223,579	1,190,215	85,882	233,455	139,917	3,872	192,200
37	Energy												
38	Sub. Distribution	17,244,082	7,894,430	419,729	1,000,202	5,335,858	239,842	1,204,648	123,438	270,353	161,361	5,075	589,146
39													
40	Total	42,819,417	17,531,674	909,744	1,928,483	16,151,815	664,716	3,540,287	239,747	639,130	357,274	9,822	846,724

**Cost of Service Summary
Rate Design Factors -- BUNDLED**

Line No.	Category	Units	Total	Residential Service General Use 18-RS	Residential Space Heating 18-RS	General Service Small 18-GSS	General Service Large 18-GSL	General Service Space Heating Rider No 1	Industrial Service 18-IS	Municipal Power Service 18-M-I	Water Pumping Service 18-WP	Irrigation Service 18-IP-I	Temporary Service 18-CS	Lighting
41	Costs Broken Down by Function													
42	Power Supply													
43	Direct													
44	Wholesale Cost	\$/Mo./cons												
45	Allocated Cost	\$/Mo./cons												
46	Subtotal													
47	Capacity Related													
48	Wholesale Cost	¢/kWh	2.19	2.53	2.13	2.05	2.09	2.16	1.80	2.13	1.54	2.41	2.55	1.06
49	Allocated Cost	¢/kWh	0.03	0.04	0.03	0.03	0.03	0.03	0.03	0.03	0.02	0.04	0.04	0.02
50	Subtotal	¢/kWh	2.23	2.56	2.16	2.08	2.12	2.19	1.83	2.17	1.57	2.44	2.59	1.07
51	Energy Related													
52	Wholesale Cost	¢/kWh	3.67	3.67	3.67	3.67	3.67	3.67	3.67	3.67	3.67	3.67	3.67	3.67
53	Allocated Cost	¢/kWh	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06
54	Subtotal	¢/kWh	3.73	3.73	3.73	3.73	3.73	3.73	3.73	3.73	3.73	3.73	3.73	3.73
55	Sub. Power Supply	¢/kWh	5.96	6.29	5.89	5.82	5.85	5.92	5.56	5.90	5.30	6.17	6.32	4.80
56	Transmission													
57	Direct	¢/kWh												
58	Capacity	¢/kWh	1.44	1.58	1.49	1.37	1.42	1.48	1.22	1.36	1.01	1.24	1.82	1.00
59	Energy	¢/kWh												
60	Allocated Cost	¢/kWh	1.04	1.14	1.08	0.99	1.02	1.07	0.88	0.98	0.73	0.90	1.31	0.72
61	Sub. Transmission	¢/kWh	2.48	2.72	2.57	2.36	2.44	2.55	2.10	2.34	1.74	2.14	3.13	1.72
62	Distribution													
63	Direct	\$/Mo./cons	1.45											6.52
64	Consumer	\$/Mo./cons	14.33	17.44	17.44	18.84	22.22	22.22	71.10	22.38	43.56	43.58	17.44	0.35
65	Capacity	¢/kWh	4.34	5.04	5.20	3.79	3.80	4.46	3.90	6.08	4.45	5.93	7.71	4.87
66	Energy	¢/kWh												
67	Sub. Distribution	¢/kWh	5.69	7.39	7.25	8.81	4.09	4.78	3.95	8.74	5.15	6.84	10.11	14.92
68	Total	¢/kWh	14.13	16.40	15.71	16.99	12.38	13.26	11.61	16.98	12.19	15.15	19.56	21.45
69	Costs Broken Down by Classification													
70	Direct	\$/Mo./cons	1.45											6.52
71	Consumer	\$/Mo./cons	14.33	17.44	17.44	18.84	22.22	22.22	71.10	22.38	43.56	43.58	17.44	0.35
72	Capacity	¢/kWh	9.05	10.33	9.93	8.24	8.37	9.20	7.84	10.59	7.75	10.51	13.43	7.66
73	Energy	¢/kWh	3.73	3.73	3.73	3.73	3.73	3.73	3.73	3.73	3.73	3.73	3.73	3.73
74	Total	¢/kWh	14.13	16.40	15.71	16.99	12.38	13.26	11.61	16.98	12.19	15.15	19.56	21.45

Classification of Plant in Service -- BUNDLED

Line No.	Acct. No.	Description	Class. Factor	Power Supply		Transmission		Dist. Substation		Primary Line		Line Transf.		Second. & Serv. Cons.	Meter Cons.	Acct. & Serv. Cons.	Revenue
				Energy	Capacity	Energy	Capacity	Capacity	Cons.	Capacity	Cons.	Capacity	Cons.				
1		Intangible Plant															
2	301	Organization	PLNT														
3	302	Franchises and consents	PLNT														
4	303	Miscellaneous intangible plant	PLNT														
5	301-303	Subtotal															
6																	
7		Production Plant															
8	310-346	Production Plant	PROD1														
9																	
10		Transmission Plant															
11	350-359	Transmission Plant	TRAN1	29,310,492		29,310,492											
12																	
13		Distribution Plant															
14	360	Land	LAND	16,306				16,306									
15	361	Structures	SUB	59,605				59,605									
16	362	Station	SUB	11,003,925				11,003,925									
17	363	Battery	SUB														
18	364	Poles, towers	PRI-OH	15,057,486					15,057,486								
19	365	OH Conduit	PRI-OH	12,961,782					12,961,782								
20	366	UG Conduit	PRI-UG														
21	367	UG Conduit	PRI-UG	2,975,788					2,975,788								
22	368	Transf	TRF	7,667,021							7,667,021						
23	369	Services	SERV	1,633,235								1,633,235					
24	370	Meters	MTR	5,910,592											5,910,592		
25	371	Cons Premise	ICON	345,457					345,457								
26	372	Leased Prop	LICON														
27	373	St. Light	STL	1,477,369													
28	360-373	Subtotal		59,108,566				11,079,835	31,340,514		7,667,021		1,633,235		5,910,592		
29																	
30		General Plant															
31	389	Land & Land Rights	PLNT	272,812		90,436	34,186		96,699		23,656		5,039		18,237		
32	390	Structures and Improve.	PLNT	6,807,460		2,256,640	853,046		2,412,933		590,291		125,744		455,062		
33	391	Office Furniture & Equip.	PLNT	722,811		239,608	90,576		256,203		62,677		13,351		48,318		
34	392	Transportation & Equipment	PLNT	3,998,692		1,325,547	501,078		1,417,353		346,736		73,862		267,303		
35	393	Stores Equipment	PLNT	368,215		122,062	46,141		130,515		31,929		6,801		24,614		
36	394	Tool, Shop & Garage Equip.	PLNT	64,829		21,490	8,124		22,979		5,621		1,197		4,334		
37	395	Laboratory Equipment	PLNT	291,250		96,548	36,497		103,235		25,255		5,380		19,469		
38	396	Power Operated Equipment	PLNT	122,810		40,711	15,389		43,531		10,649		2,268		8,210		
39	397	Communication Equipment	PLNT	344,385		114,162	43,155		122,069		29,862		6,361		23,021		
40	398	Miscellaneous Equipment	PLNT	146,092		48,429	18,307		51,783		12,668		2,699		9,766		
41	399	Other tangible property	PLNT														
42	389-399	Subtotal		13,139,357		4,355,634	1,646,499		4,657,301		1,139,344		242,704		878,333		
43																	
44		Total Plant		101,558,415		33,666,126	12,726,335		35,997,815		8,806,365		1,875,939		6,788,925		

Classification of Plant in Service -- BUNDLED

Line No.	Acct. No.	Description	Class. Factor	Total	Residential Service	Residential	General Service	General Service	General Service	Industrial	Municipal Power	Water Pumping	Irrigation	Temporary	Lighting
					General Use 18-RS Direct	Space Heating 18-RS Direct	Small 18-GSS Direct	Large 18-GSL Direct	Space Heating Rider No 1 Direct	Service 18-IS Direct	Service 18-M-I Direct	Service 18-WP Direct	Service 18-IP-I Direct	Service 18-CS Direct	Lighting Direct
1		Intangible Plant													
2	301	Organization	PLNT												
3	302	Franchises and consents	PLNT												
4	303	Miscellaneous intangible plant	PLNT												
5	301-303	Subtotal													
6															
7		Production Plant													
8	310-346	Production Plant	PROD1												
9															
10		Transmission Plant													
11	350-359	Transmission Plant	TRAN1	29,310,492											
12															
13		Distribution Plant													
14	360	Land	LAND	16,306											
15	361	Structures	SUB	59,605											
16	362	Station	SUB	11,003,925											
17	363	Battery	SUB												
18	364	Poles, towers	PRI-OH	15,057,486											
19	365	OH Cond	PRI-OH	12,961,782											
20	366	UG Conduit	PRI-UG												
21	367	UG Cond	PRI-UG	2,975,788											
22	368	Transf	TRF	7,667,021											
23	369	Services	SERV	1,633,235											
24	370	Meters	MTR	5,910,592											
25	371	Cons Premise	ICON	345,457											
26	372	Leased Prop	LICON												
27	373	St. Light	STL	1,477,369											1,477,369
28	360-373	Subtotal		59,108,566											1,477,369
29															
30		General Plant													
31	389	Land & Land Rights	PLNT	272,812											4,558
32	390	Structures and Improve.	PLNT	6,807,460											113,744
33	391	Office Furniture & Equip.	PLNT	722,811											12,077
34	392	Transportation & Equipment	PLNT	3,998,692											66,813
35	393	Stores Equipment	PLNT	368,215											6,152
36	394	Tool, Shop & Garage Equip.	PLNT	64,829											1,083
37	395	Laboratory Equipment	PLNT	291,250											4,866
38	396	Power Operated Equipment	PLNT	122,810											2,052
39	397	Communication Equipment	PLNT	344,385											5,754
40	398	Miscellaneous Equipment	PLNT	146,092											2,441
41	399	Other tangible property	PLNT												
42	389-399	Subtotal		13,139,357											219,542
43															
44		Total Plant		101,558,415											1,696,911

Classification of Revenue Requirements -- BUNDLED

Line No.	Acct. No.	Description	Class. Factor	Power Supply		Transmission		Dist. Substation		Primary Line		Line Transf.		Second. & Serv. Cons.	Meter Cons.	Acct. & Serv. Cons.	Revenue
				Total	Energy	Capacity	Energy	Capacity	Capacity	Cons.	Capacity	Cons.	Capacity				
1		Power Supply															
2		Production															
3	500-557	Fuel	FUEL														
4	500-557	Non-Fuel O&M - Demand	PROD1														
5	500-557	Non-Fuel O&M - Energy	PROD1														
6		Subtotal - Production															
7		Purchases															
8	555	Direct Assign. Chgs (Cr.)															
9	555	Substation Charges	SUB														
10	555	Demand Charges	PURKW-1														
11	555	Summer - MKEC	PURKW-2	3,024,070		3,024,070											
12	555	Winter - MKEC	PURKW-3	3,624,566		3,624,566											
16	555	Energy Charges	PURKWH-1	11,132,967	11,132,967												
17	555	ECA Charges	PURKWH-2														
18	555	Contract Energy	PURKWH-3														
19	555	Revenue Related Charges	REV														
20		Subtotal - Purchases		17,781,603	11,132,967	6,648,636											
21	500-557	Total Power Supply		17,781,603	11,132,967	6,648,636											
22																	
23		Transmission															
24	560-573	Operation & Maintenance	TRAN1	548,530			548,530										
26	555	Transmission - MKEC	TRAN3	3,817,140			3,817,140										
27	555	Transmission - SEPC	TRAN4														
28	555	Transmission - KEPCo	TRAN5														
29		Total Transmission		4,365,670			4,365,670										
30																	
31		Distribution		45,133													
32	580	Oper. Super & Eng.	EX1	503,968				95,282		320,922					78,091		
33	581	Load Dispatch	EX1														
34	582	Oper. Station	SUB	485,632				485,632									
35	583	Oper. OH Line	PRI-OH	1,322,742						1,322,742							
36	584	Oper. UG Line	PRI-UG	248,803						248,803							
37	585	Oper. St. Lighting	STL	49,298													
38	586	Oper. Meters	MTR	398,015											398,015		
39	587	Oper. Cons. Install	ICON	64,125						64,125							
40	588	Oper. Misc. Oper.	EX1	1,122,510				212,226		714,804					173,937		
41	589	Rents	EX1														
42	590	Main. Super. & Eng.	EX2	193,957				22,282		163,533		741			517		
43	591	Main. Structure	SUB														
44	592	Main. Station	SUB	146,099				146,099									
45	593	Main. OH Line	PRI-OH	1,059,327						1,059,327							
46	594	Main. UG Line	PRI-UG	12,917						12,917							
47	595	Main. Line Transf.	TRF	4,859								4,859					
48	596	Main. St. Lighting	STL	45,133													
49	597	Main. Meters	MTR	3,390											3,390		
50	598	Main. Misc. Dist.	EX2	239,993				27,571		202,348		917			640		
51	580-598	Subtotal		5,900,769				989,092		4,109,522		6,518			654,590		

Classification of Revenue Requirements -- BUNDLED

Line No.	Acct. No.	Description	Class. Factor	Total	Residential Service General Use 18-RS Direct	Residential Space Heating 18-RS Direct	General Service Small 18-GSS Direct	General Service Large 18-GSL Direct	General Service Space Heating Rider No 1 Direct	Industrial Service 18-IS Direct	Municipal Power Service 18-M-1 Direct	Water Pumping Service 18-WP Direct	Irrigation Service 18-IP-1 Direct	Temporary Service 18-CS Direct	Lighting Direct
1		Power Supply													
2		Production													
3	500-557	Fuel	FUEL												
4	500-557	Non-Fuel O&M - Demand	PROD1												
5	500-557	Non-Fuel O&M - Energy	PROD1												
6		Subtotal - Production													
7		Purchases													
8	555	Direct Assign. Chgs (Cr.)													
9	555	Substation Charges	SUB												
10	555	Demand Charges	PURKW-1												
11	555	Summer - MKEC	PURKW-2	3,024,070											
12	555	Winter - MKEC	PURKW-3	3,624,566											
16	555	Energy Charges	PURKWH-1	11,132,967											
17	555	ECA Charges	PURKWH-2												
18	555	Contract Energy	PURKWH-3												
19	555	Revenue Related Charges	REV												
20		Subtotal - Purchases		17,781,603											
21	500-557	Total Power Supply		17,781,603											
22															
23		Transmission													
24	560-573	Operation & Maintenance	TRAN1	548,530											
26	555	Transmission - MKEC	TRAN3	3,817,140											
27	555	Transmission - SEPC	TRAN4												
28	555	Transmission - KEPCo	TRAN5												
29		Total Transmission		4,365,670											
30															
31		Distribution		45,133											
32	580	Oper. Super & Eng.	EX1	503,968											
33	581	Load Dispatch	EX1												9,672
34	582	Oper. Station	SUB	485,632											
35	583	Oper. OH Line	PRI-OH	1,322,742											
36	584	Oper. UG Line	PRI-UG	248,803											
37	585	Oper. St. Lighting	STL	49,298											49,298
38	586	Oper. Meters	MTR	398,015											
39	587	Oper. Cons. Install	ICON	64,125											
40	588	Oper. Misc. Oper.	EX1	1,122,510											21,544
41	589	Rents	EX1												
42	590	Main. Super. & Eng.	EX2	193,957											6,883
43	591	Main. Structure	SUB												
44	592	Main. Station	SUB	146,099											
45	593	Main. OH Line	PRI-OH	1,059,327											
46	594	Main. UG Line	PRI-UG	12,917											
47	595	Main. Line Transf.	TRF	4,859											
48	596	Main. St. Lighting	STL	45,133											45,133
49	597	Main. Meters	MTR	3,390											
50	598	Main. Misc. Dist.	EX2	239,993											8,517
51	580-598	Subtotal		5,900,769											141,047

Classification of Revenue Requirements -- BUNDLED
(Continued)

Line No.	Acct. No.	Description	Class. Factor	Total	Power Supply		Transmission		Dist. Substation		Primary Line		Line Transf.		Second. & Serv. Cons.	Meter Cons.	Acct. & Serv. Cons.	Revenue
					Energy	Capacity	Energy	Capacity	Capacity	Cons.	Capacity	Cons.	Capacity	Cons.				
52		Consumer Acct., Service & Sales																
53		Consumer Accounting																
54	901	Supervision	CACC															
55	902	Meter Reading Expense	CACC	39,525													39,525	
56	903	Records & Collections	CACC	1,063,764													1,063,764	
57	904	Uncollectible Accounts	CACC	65,837													65,837	
58	905	Misc. Customer Account	CACC	41,977													41,977	
59		Subtotal		1,211,103													1,211,103	
60																		
61		Consumer Service & Info.																
62	907	Supervision	CS	11,546													11,546	
63	908	Customer Assistance	CS	179,478													179,478	
64	909	Info. & Instruction	CS															
65	910	Misc. Cust Serv. & Info	CS	21,233													21,233	
66		Subtotal		212,257													212,257	
67																		
68		Sales																
69	911	Supervision	SALES															
70	912	Demonstrating & Selling	SALES	6,649													6,649	
71	913	Advertising	SALES															
72	916	Misc. Sales	SALES															
73		Subtotal		6,649													6,649	
74																		
75		Prorated Operating Expenses																
76	920-	Administrative & General																
77	932	Power Supply	EX6-PS	184,003	115,203	68,800												
78		Transmission	EX6-TR	91,288			91,288											
79		Distribution	EX6-D	1,564,740				211,120		877,169		1,391				139,721	305,232	
80		Subtotal - A&G		1,840,031	115,203	68,800		91,288	211,120	877,169		1,391			139,721	305,232		
81																		
82	408	Other Taxes																
83		Power Supply	EX6-PS															
84		Transmission	EX6-TR															
85		Distribution	REV	(46,333)														(46,333)
86		Subtotal - Other Taxes		(46,333)														(46,333)
87																		
88	421-	Miscellaneous Expense																
89	426,431	Power Supply	EX6-PS	85,926	53,798	32,128												
90		Transmission	EX6-TR	42,630			42,630											
91		Distribution	EX6-D	730,703				98,589		409,621		650			65,247	142,538		
92		Subtotal - Misc. Expense		859,258	53,798	32,128		42,630	98,589	409,621		650		65,247	142,538			

Classification of Revenue Requirements -- BUNDLED

(Continued)

Line No.	Acct. No.	Description	Class. Factor	Total	Residential Service	Residential	General Service	General Service	General Service	Industrial	Municipal Power	Water Pumping	Irrigation	Temporary	Lighting
					General Use	Space Heating	Small	Large	Space Heating	Service	Service	Service	Service	Service	Lighting
					18-RS	18-RS	18-GSS	18-GSL	Rider No 1	18-IS	18-M-I	18-WP	18-IP-I	18-CS	Direct
					Direct	Direct	Direct	Direct	Direct	Direct	Direct	Direct	Direct	Direct	Direct
52		Consumer Acct., Service & Sales													
53		Consumer Accounting													
54	901	Supervision	CACC												
55	902	Meter Reading Expense	CACC	39,525											
56	903	Records & Collections	CACC	1,063,764											
57	904	Uncollectible Accounts	CACC	65,837											
58	905	Misc. Customer Account	CACC	41,977											
59		Subtotal		1,211,103											
60															
61		Consumer Service & Info.													
62	907	Supervision	CS	11,546											
63	908	Customer Assistance	CS	179,478											
64	909	Info. & Instruction	CS												
65	910	Misc. Cust Serv. & Info	CS	21,233											
66		Subtotal		212,257											
67															
68		Sales													
69	911	Supervision	SALES												
70	912	Demonstrating & Selling	SALES	6,649											
71	913	Advertising	SALES												
72	916	Misc. Sales	SALES												
73		Subtotal		6,649											
74															
75		Prorated Operating Expenses													
76	920-	Administrative & General													
77	932	Power Supply	EX6-PS	184,003											
78		Transmission	EX6-TR	91,288											
79		Distribution	EX6-D	1,564,740											30,106
80		Subtotal - A&G		1,840,031											30,106
81															
82	408	Other Taxes													
83		Power Supply	EX6-PS												
84		Transmission	EX6-TR												
85		Distribution	REV	(46,333)											
86		Subtotal - Other Taxes		(46,333)											
87															
88	421-	Miscellaneous Expense													
89	426,431	Power Supply	EX6-PS	85,926											
90		Transmission	EX6-TR	42,630											
91		Distribution	EX6-D	730,703											14,059
92		Subtotal - Misc. Expense		859,258											14,059

Classification of Revenue Requirements -- BUNDLED
(Continued)

Line No.	Acct. No.	Description	Class. Factor	Power Supply		Transmission		Dist. Substation		Primary Line		Line Transf.		Second. & Serv.	Meter	Acct. & Serv.	Revenue
				Energy	Capacity	Energy	Capacity	Capacity	Cons.	Capacity	Cons.	Cons.	Cons.	Cons.			
93		Fixed Charges															
94	403-	Depreciation															
95	407	Power Supply	PROPLNT														
96		Transmission	TRNPLNT	801,970		801,970											
97		Distribution	DSTPLNT	1,769,329			331,659		938,133		229,501		48,889		176,925		
98		Subtotal - Depreciation		2,571,298		801,970	331,659		938,133		229,501		48,889		176,925		
99																	
100	408	Property Taxes															
101		Power Supply	REV														
102		Transmission	REV														
103		Distribution	REV														
104		Subtotal - Property Taxes															
105																	
106	427	Interest-LT															
107		Power Supply	PROPLNT														
108		Transmission	TRNPLNT	1,307,821		1,307,821											
109		Distribution	DSTPLNT	3,469,208			650,299		1,839,442		449,994		95,858		346,905		
110		Subtotal - Interest-LT		4,777,030		1,307,821	650,299		1,839,442		449,994		95,858		346,905		
111																	
112		Required Margin															
113		Power Supply	PROPLNT														
114		Transmission	TRNPLNT	914,424		914,424											
115		Distribution	DSTPLNT	2,425,658			454,687		1,286,131		314,634		67,024		242,555		
116		Subtotal - Required Margin		3,340,082		914,424	454,687		1,286,131		314,634		67,024		242,555		
117																	
118		Summary of Revenue Requirements															
119		Power Supply		18,051,532	11,301,968	6,749,564											
120		Transmission		7,523,803			7,523,803										
121		Distribution		17,244,082				2,735,446	9,460,017		1,002,687		211,770	1,625,943	1,877,778	(46,333)	
122		Total Revenue Required		42,819,417	11,301,968	6,749,564	7,523,803	2,735,446	9,460,017		1,002,687		211,770	1,625,943	1,877,778	(46,333)	

Classification of Revenue Requirements -- BUNDLED
(Continued)

Line No.	Acct. No.	Description	Class. Factor	Total	Residential Service General Use 18-RS Direct	Residential Space Heating 18-RS Direct	General Service Small 18-GSS Direct	General Service Large 18-GSL Direct	General Service Space Heating Rider No 1 Direct	Industrial Service 18-IS Direct	Municipal Power Service 18-M-1 Direct	Water Pumping Service 18-WP Direct	Irrigation Service 18-IP-1 Direct	Temporary Service 18-CS Direct	Lighting Direct
93		Fixed Charges													
94	403-	Depreciation													
95	407	Power Supply	PROPLNT												
96		Transmission	TRNPLNT	801,970											
97		Distribution	DSTPLNT	1,769,329											44,223
98		Subtotal - Depreciation		2,571,298											44,223
99															
100	408	Property Taxes													
101		Power Supply	REV	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
102		Transmission	REV	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
103		Distribution	REV	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
104		Subtotal - Property Taxes													
105															
106	427	Interest-LT													
107		Power Supply	PROPLNT												
108		Transmission	TRNPLNT	1,307,821											
109		Distribution	DSTPLNT	3,469,208											86,710
110		Subtotal - Interest-LT		4,777,030											86,710
111															
112		Required Margin													
113		Power Supply	PROPLNT												
114		Transmission	TRNPLNT	914,424											
115		Distribution	DSTPLNT	2,425,658											60,627
116		Subtotal - Required Margin		3,340,082											60,627
117															
118		Summary of Revenue Requirements													
119		Power Supply		18,051,532											
120		Transmission		7,523,803											
121		Distribution		17,244,082											376,772
122		Total Revenue Required		42,819,417											376,772

**Adjusted Statement of Operations
and Revenue Requirements**

(a) Line No.	(b) Description	(c) Total System ¹	(d) Adjustment ²	(e) SpRateElim Adjustment ³	(f) LAC Revenue Credits ⁴	(g) Adjusted System
	Operating Revenue	(\$)		(\$)		(\$)
1	Retail Electricity Sales	68,808,760	302,529	(26,291,817)		42,819,472
2	Wholesale Electricity Sales	2,142,184			(2,142,184)	
3	Other Operating Revenue	305,461	(302,529)			2,932
4	Total Operating Revenue	71,256,405		(26,291,817)	(2,142,184)	42,822,404
5	Operating Expenses					
6	Cost of Purchased Power					
7	Transmission - all Capacity	7,288,658		(3,471,518)	-	3,817,140
8	Demand					
9	Summer	5,314,551		(2,290,482)		3,024,070
10	Winter	7,643,209		(4,018,643)		3,624,566
11	Energy	9,898,085		(5,830,002)	-	4,068,083
12	ECA	16,791,346		(9,726,461)	-	7,064,884
13	Transmission - O & M	1,293,444		(202,656)	(542,258)	548,530
14	Distribution - Operation	4,195,093		-	-	4,195,093
15	Distribution - Maintenance	1,705,676		-	-	1,705,676
16	Consumer Accounts	1,211,103		-	-	1,211,103
17	Consumer Service & Information	212,257		-	-	212,257
18	Sales	6,649		-	-	6,649
19	Administrative & General	2,086,076		(202,656)	(43,389)	1,840,031
20	Depreciation & Amortization	3,064,894		(202,656)	(290,940)	2,571,298
21	Taxes - Property	-		-	-	-
22	Taxes - Other	(51,878)		-	5,545	(46,333)
23	Other Interest Expense	108,337		-	(11,274)	97,063
24	Other Deductions	861,019		-	(98,824)	762,195
25	Total Operating Expenses (Before					
26	Long Term	61,628,518		(25,945,074)	(981,139)	34,702,305
27	Long Term Interest	5,625,339		(202,656)	(645,653)	4,777,030
28	Required Margin ⁴	3,999,561		(144,087)	(515,393)	3,340,082
29	Revenue Requirements	71,253,418		(26,291,817)	(2,142,184)	42,819,417

¹ See Exhibit 2, page 1.

² Move Unbilled Revenue (\$444,182) and ACA Under-recovery \$141,653 into Other Operating Revenue - net sum of (\$302,529).

³ See next page for calculation of adjustments for rates not included in the class cost of service analysis.

⁴ Credits related to revenue generated by the Local Access Rate.

⁵ Required Net Operating Income less Interest. See calculation below:

$$9,733,237 - \$5,733,676 = \$3,999,561$$

**Adjustment to Eliminate Revenue
and Expenses Associated with Non-Adjustable Rates**

1. Revenue ¹	Proposed (\$)
a. Real -Time Pricing (13-RTP)	= 33,528
b. Transmission Level Service (18-STR)	= 26,258,290
c. Total -- Revenue	= <u>26,291,817</u>
2. Expenses	
a. Purchased Power Expenses ²	
Transmission	
Transmission Level Service (18-STR)	= 3,471,518
Subtotal -- Transmission Expenses	<u>3,471,518</u>
Demand	
Transmission Level Service (18-STR)	= 6,309,124
Subtotal -- Demand Expenses	<u>6,309,124</u>
Energy	
Transmission Level Service (18-STR)	= 5,808,023
Real -Time Pricing (13-RTP)	= 21,979
Subtotal -- Energy Expenses	<u>5,830,002</u>
ECA	
Transmission Level Service (18-STR)	= 9,726,461
Subtotal -- ECA	<u>9,726,461</u>
Total -- Purchased Power Expenses	25,337,105
b. Transmission O&M	= 202,656 ³
d. Administrative and General	= 202,656 ³
e. Depreciation	= 202,656 ³
f. Interest	= 202,656 ³
g. Margin Requirements	= 144,087 ³
h. Subtotal	<u>954,712</u>
i. Total -- Expenses	<u>\$ 26,291,817</u>

¹ From Exhibit PSE-2, Schedule A.

² From Exhibit PSE-2 - see Schedule A, Page 5 for STR wholesale power detail, Schedule B Page 9 for RTP rider.

³ Margin requirement based on Target ratio. Split remainder of revenue equally between Transmission Operation and Maintenance, A&G, Depreciation, and Interest.

Summary of Classification Factors -- BUNDLED

Line No.	Name	Description	Source	Total	Power Supply		Transmission		Dist. Substation		Primary Line		Line Transf.		Second.	Meter	Acct.	Revenue
					Energy	Cap.	Energy	Capacity	Cap.	Cons.	Cap.	Cons.	Cons.	Cons.	Cons.			
Classification Factor Data																		
1	PROPLNT	Production Plant	Plant															
2	TRNPLNT	Transmission Plant	Plant	29,310,492			29,310,492											
3	DSTPLNT	Distribution Plant	Plant	59,108,566					11,079,835		31,340,514		7,667,021		1,633,235	5,910,592		
4	PLNT	Prod, Trans, Dist. Subtotal	Plant	88,419,058			29,310,492		11,079,835		31,340,514		7,667,021		1,633,235	5,910,592		
5	EX1	Assigned Dist. Oper. Exp.	Rev Req	2,568,614					485,632		1,635,670					398,015		
6	EX2	Assigned Dist. Main. Exp.	Rev Req	1,271,726					146,099		1,072,244		4,859			3,390		
7	EX3	Dist. Oper. & Main.	Rev Req	5,900,769					989,092		4,109,522		6,518			654,590		
8	EX4	Assigned O & M Exp.	Rev Req	29,478,050	11,132,967	6,648,636	4,365,670		989,092		4,109,522		6,518			654,590	1,430,008	
9	EX4-PS	Power Supply	Rev Req	17,781,603	11,132,967	6,648,636												
10	EX4-TR	Transmission	Rev Req	4,365,670			4,365,670											
11	EX4-D	Distribution	Rev Req	7,330,777					989,092		4,109,522		6,518			654,590	1,430,008	
12	EX5	Rev. Req. Less Margin	Rev Req	37,094,140	11,301,968	6,749,564	6,475,461		1,971,050		6,887,097		686,013		144,747	1,178,420	1,430,008	(46,333)
13	EX5-PS	Power Supply	Rev Req	18,005,199	11,301,968	6,749,564												(46,333)
14	EX5-TR	Transmission	Rev Req	6,475,461			6,475,461											
15	EX5-D	Distribution	Rev Req	12,613,480					1,971,050		6,887,097		686,013		144,747	1,178,420	1,430,008	

Summary of Classification Factors -- BUNDLED

Line No.	Name	Description	Source	Total	Residential Service	Residential	General Service	General Service	General Service	Industrial	Municipal Power	Water Pumping	Irrigation	Temporary	Lighting	
					General Use	Space Heating	Small	Large	Space Heating	Service	Service	Service	Service	Service	Service	Service
					18-RS	18-RS	18-GSS	18-GSL	Rider No 1	18-IS	18-M-I	18-WP	18-IP-I	18-CS		
					Direct	Direct	Direct	Direct	Direct	Direct	Direct	Direct	Direct	Direct	Direct	
Classification Factor Data																
1	PROPLNT	Production Plant	Plant													
2	TRNPLNT	Transmission Plant	Plant	29,310,492												
3	DSTPLNT	Distribution Plant	Plant	59,108,566												1,477,369
4	PLNT	Prod, Trans, Dist. Subtotal	Plant	88,419,058												1,477,369
5	EX1	Assigned Dist. Oper. Exp.	Rev Req	2,568,614												49,298
6	EX2	Assigned Dist. Main. Exp.	Rev Req	1,271,726												45,133
7	EX3	Dist. Oper. & Main.	Rev Req	5,900,769												141,047
8	EX4	Assigned O & M Exp.	Rev Req	29,478,050												141,047
9	EX4-PS	Power Supply	Rev Req	17,781,603												
10	EX4-TR	Transmission	Rev Req	4,365,670												
11	EX4-D	Distribution	Rev Req	7,330,777												141,047
12	EX5	Rev. Req. Less Margin	Rev Req	37,094,140												316,145
13	EX5-PS	Power Supply	Rev Req	18,005,199												
14	EX5-TR	Transmission	Rev Req	6,475,461												
15	EX5-D	Distribution	Rev Req	12,613,480												316,145

Summary of Classification Factors -- BUNDLED

Line No.	Name	Description	Source	Total	Power Supply		Transmission		Dist. Substation		Primary Line		Line Transf.		Second. & Serv.	Meter	Acct. & Serv.	Revenue	
					Energy	Cap.	Energy	Capacity	Cap.	Cons.	Cap.	Cons.	Cap.	Cons.	Cons.	Cons.	Cons.		
16	Classification Factors																		
17	CACC	Consumer Accounting	Input	1.000000														1.000000	
18	CS	Customer Service	Input	1.000000														1.000000	
19	CS-PS	Cust. Service - Pwr. Supply	Input																
20	CS-TR	Cust. Service - Transmission	Input																
21	CS-D	Cust. Service - Distribution	Input	1.000000														1.000000	
22	SALES	Sales	Input	1.000000														1.000000	
23	SALES-PS	Sales - Power Supply	Input																
24	SALES-TR	Sales - Transmission	Input																
25	SALES-D	Sales - Distribution	Input	1.000000														1.000000	
26	PROPLNT	Production Plant	Plant																
27	TRNPLNT	Transmission Plant	Plant	1.000000				1.000000											
28	DSTPLNT	Distribution Plant	Plant	1.000000					0.187449		0.530219		0.129711		0.027631	0.099996			
29	PLNT	Prod, Trans, Dist. Subtotal	Plant	1.000000				0.331495		0.125310	0.354454		0.086712		0.018472	0.066847			
30	EX1	Assigned Dist. Oper. Exp.	Rev Req	1.000000					0.189064		0.636791					0.154953			
31	EX2	Assigned Dist. Main. Exp.	Rev Req	1.000000					0.114883		0.843141		0.003821			0.002666			
32	EX3	Dist. Oper. & Main.	Rev Req	1.000000					0.167621		0.696438		0.001105			0.110933			
33	EX4	Assigned O & M Exp.	Rev Req	1.000000	0.377670	0.225545		0.148099	0.033554		0.139410		0.000221			0.022206	0.048511		
34	EX4-PS	Power Supply	Rev Req	0.603215	0.377670	0.225545													
35	EX4-TR	Transmission	Rev Req	0.148099				0.148099											
36	EX4-D	Distribution	Rev Req	0.248686					0.033554		0.139410		0.000221			0.022206	0.048511		
37	EX5	Rev. Req. Less Margin	Rev Req	1.000000	0.304683	0.181958		0.174568	0.053136		0.185665		0.018494		0.003902	0.031768	0.038551	(0.001249)	
38	EX5-PS	Power Supply	Rev Req	0.485392	0.304683	0.181958												(0.001249)	
39	EX5-TR	Transmission	Rev Req	0.174568				0.174568											
40	EX5-D	Distribution	Rev Req	0.340040					0.053136		0.185665		0.018494		0.003902	0.031768	0.038551		
41	EX6	A&G Classification	Input	1.000000	0.062609	0.037391		0.049612	0.114737		0.476714		0.000756			0.075934	0.165884		
42	EX6-PS	Power Supply	Input	0.100000	0.062609	0.037391													
43	EX6-TR	Transmission	Input	0.049612				0.049612											
44	EX6-D	Distribution	Input	0.850388					0.114737		0.476714		0.000756			0.075934	0.165884		
45	FUEL	Fuel	Input																
46	ICON	Install Cons. Prem.	Input	1.000000							1.000000								
47	LAND	Land & Land Rights	Input	1.000000					1.00000										
48	LICON	Leased Property	Input	1.000000							1.000000								
49	MTR	Meters	Input	1.000000												1.000000			
50	PRI-OH	Primary Line - Overhead	Input	1.000000							1.000000								
51	PRI-UG	Primary Line - Underground	Input	1.000000							1.000000								
52	PROD1	Production Plant	Input																
53	PROD2	Production O & M	Input																
54	PURTR-1	Trans. Capacity	Input	1.000000				1.000000											
55	PURTR-2	Trans. Energy	Input	1.000000	1.000000														
56	PURKW-1	Purchased Power Capacity	Input	1.000000		1.000000													
57	PURKW-2	MKEC - Summer	Input	1.000000		1.000000													
58	PURKW-3	MKEC - Winter	Input	1.000000		1.000000													
58	PURKWH-1	Purchased Power Energy	Input	1.000000	1.000000														
59	PURKWH-2	On-Peak	Input	1.000000	1.000000														
60	PURKWH-3	Off-Peak	Input	1.000000	1.000000														
61	SERV	Services	Input	1.000000											1.000000				
62	STL	Street Lighting	Input																
63	SUB	Substation	Input	1.000000					1.000000										
64	TRAN1	Transmission O&M - MKEC	Input	1.000000				1.000000											
65	TRAN3	Transmission Purchases - MKEC	Input	1.000000				1.000000											
66	TRF	Line Transf.	Input	1.000000									1.000000						
67	REV	Revenue Related	Input	1.000000														1.000000	

Summary of Classification Factors -- BUNDLED

Line No.	Name	Description	Source	Total	Residential General Use 18-RS Direct	Residential Space Heating 18-RS Direct	General Service Small 18-GSS Direct	General Service Large 18-GSL Direct	General Service Space Heating Rider No 1 Direct	Industrial Service 18-IS Direct	Municipal Service 18-M-I Direct	Water Pumping Service 18-WP Direct	Irrigation Service 18-IP-I Direct	Temporary Service 18-CS Direct	Lighting Direct
16	Classification Factors														
17	CACC	Consumer Accounting	Input	1.000000											
18	CS	Customer Service	Input	1.000000											
19	CS-PS	Cust. Service - Pwr. Supply	Input												
20	CS-TR	Cust. Service - Transmission	Input												
21	CS-D	Cust. Service - Distribution	Input	1.000000											
22	SALES	Sales	Input	1.000000											
23	SALES-PS	Sales - Power Supply	Input												
24	SALES-TR	Sales - Transmission	Input												
25	SALES-D	Sales - Distribution	Input	1.000000											
26	PROPLNT	Production Plant	Plant												
27	TRNPLNT	Transmission Plant	Plant	1.000000											
28	DSTPLNT	Distribution Plant	Plant	1.000000											
29	PLNT	Prod, Trans, Dist. Subtotal	Plant	1.000000											0.024994
30	EX1	Assigned Dist. Oper. Exp.	Rev Req	1.000000											0.019192
31	EX2	Assigned Dist. Main. Exp.	Rev Req	1.000000											0.035489
32	EX3	Dist. Oper. & Main.	Rev Req	1.000000											0.023903
33	EX4	Assigned O & M Exp.	Rev Req	1.000000											0.004785
34	EX4-PS	Power Supply	Rev Req	0.603215											
35	EX4-TR	Transmission	Rev Req	0.148099											
36	EX4-D	Distribution	Rev Req	0.248686											0.004785
37	EX5	Rev. Req. Less Margin	Rev Req	1.000000											0.008523
38	EX5-PS	Power Supply	Rev Req	0.485392											
39	EX5-TR	Transmission	Rev Req	0.174568											
40	EX5-D	Distribution	Rev Req	0.340040											0.008523
41	EX6	A&G Classification	Input	1.000000											0.016362
42	EX6-PS	Power Supply	Input	0.100000											
43	EX6-TR	Transmission	Input	0.049612											
44	EX6-D	Distribution	Input	0.850388											0.016362
45	FUEL	Fuel	Input												
46	ICON	Install Cons. Prem.	Input	1.000000											
47	LAND	Land & Land Rights	Input	1.000000											
48	LICON	Leased Property	Input	1.000000											
49	MTR	Meters	Input	1.000000											
50	PRI-OH	Primary Line - Overhead	Input	1.000000											
51	PRI-UG	Primary Line - Underground	Input	1.000000											
52	PROD1	Production Plant	Input												
53	PROD2	Production O & M	Input												
54	PURTR-1	Trans. Capacity	Input	1.000000											
55	PURTR-2	Trans. Energy	Input	1.000000											
56	PURKW-1	Purchased Power Capacity	Input	1.000000											
57	PURKW-2	MKEC - Summer	Input	1.000000											
58	PURKW-3	MKEC - Winter	Input	1.000000											
58	PURKWH-1	Purchased Power Energy	Input	1.000000											
59	PURKWH-2	On-Peak	Input	1.000000											
60	PURKWH-3	Off-Peak	Input	1.000000											
61	SERV	Services	Input	1.000000											
62	STL	Street Lighting	Input												
63	SUB	Substation	Input	1.000000											
64	TRAN1	Transmission O&M - MKEC	Input	1.000000											
65	TRAN3	Transmission Purchases - MKEC	Input	1.000000											
66	TRF	Line Transf.	Input	1.000000											
67	REV	Revenue Related	Input	1.000000											

Summary of Allocation of Revenue Requirements to Rate Classes -- BUNDLED

Line No.	Cost Classification	Alloc. Factor	Total	Residential Service General Use 18-RS	Residential Space Heating 18-RS	General Service Small 18-GSS	General Service Large 18-GSL	General Service Space Heating Rider No 1	Industrial Service 18-IS	Municipal Power Service 18-M-I	Water Pumping Service 18-WP	Irrigation Service 18-IP-I	Temporary Service 18-CS	Lighting	
1	Power Supply														
2	Wholesale Power														
3	Direct Assigned Charges (Credits)	Direct													
4	Demand Related														
5	Demand Related - MKEC Summer	D5	3,024,070	1,472,771	39,785	97,416	1,052,921	39,541	212,874	15,359	37,231	50,465	397	5,311	
6	Demand Related - MKEC Winter	D6	3,624,566	1,226,389	83,428	135,681	1,672,210	68,709	336,192	14,778	43,667	6,240	884	36,389	
6	Subtotal - Demand		6,648,636	2,699,160	123,213	233,097	2,725,131	108,250	549,066	30,137	80,898	56,704	1,281	41,700	
7	Energy Related	E1	11,132,967	3,927,770	212,778	417,185	4,792,686	184,254	1,120,135	51,873	192,725	86,639	1,845	145,076	
8	ECA Charges	E2													
9	Contract Energy	E3													
10	Subtotal - Energy		11,132,967	3,927,770	212,778	417,185	4,792,686	184,254	1,120,135	51,873	192,725	86,639	1,845	145,076	
11	Revenue Related	R2													
12	Subtotal - Wholesale		17,781,603	6,626,930	335,991	650,282	7,517,817	292,504	1,669,201	82,010	273,623	143,343	3,126	186,777	
13	Allocated Overhead & Margin														
14	Direct Related	Direct													
15	Revenue Related	R2													
16	Demand Related	D7	100,928	40,974	1,870	3,538	41,368	1,643	8,335	457	1,228	861	19	633	
17	Energy Related	E1	169,001	59,624	3,230	6,333	72,754	2,797	17,004	787	2,926	1,315	28	2,202	
18	Subtotal - Allocated		269,929	100,598	5,100	9,871	114,122	4,440	25,339	1,245	4,154	2,176	47	2,835	
19	Subtotal - Power Supply		18,051,532	6,727,528	341,092	660,153	7,631,939	296,944	1,694,539	83,255	277,777	145,519	3,174	189,612	
20															
21	Transmission														
22	Direct Assigned	Direct													
23	Demand Related - SPEC O&M	D4	548,530	212,135	10,857	19,548	232,134	9,327	46,740	2,410	6,634	3,674	115	4,955	
24	Demand Related - MKEC Purch	D4	3,817,140	1,476,221	75,555	136,032	1,615,385	64,904	325,257	16,770	46,168	25,567	798	34,482	
25															
26	Subtotal--Transmission		4,365,670	1,688,356	86,413	155,580	1,847,519	74,231	371,997	19,180	52,803	29,241	912	39,437	
27	Allocated Overhead & Margin														
28	Direct Related	Direct													
29	Revenue Related	R2													
30	Demand Related	D8	3,158,133	1,221,360	62,511	112,547	1,336,499	53,699	269,103	13,875	38,198	21,153	660	28,529	
31	Subtotal - Allocated		3,158,133	1,221,360	62,511	112,547	1,336,499	53,699	269,103	13,875	38,198	21,153	660	28,529	
32	Subtotal - Transmission		7,523,803	2,909,716	148,924	268,127	3,184,018	127,930	641,100	33,055	91,000	50,394	1,573	67,966	
33															
34	Distribution														
35	Power Supply	-Energy	E1												
36	Dist. Sub.	-Capacity	D2	2,735,446	1,104,879	60,249	86,039	1,044,254	46,907	255,260	16,447	49,310	29,049	807	42,245
38	Primary Line	-Capacity	D2	9,460,017	3,821,012	208,361	297,549	3,611,354	162,220	882,768	56,878	170,529	100,460	2,791	146,095
40	Line Transf.	-Capacity	D1	1,002,687	482,426	33,162	48,849	323,824	15,059	56,117	12,773	14,321	10,799	288	5,068
42	Sec. & Serv.	-Consumer	C4	211,770	143,004	6,787	33,374	22,244	963	309	1,851	1,269	748	69	1,152
43	Meter	-Consumer	C5	1,625,943	1,095,383	51,990	248,929	163,926	7,100	6,555	16,570	16,534	9,604	527	8,827
44	Acct. & Serv.	-Consumer	C6	1,877,778	1,265,042	60,042	287,484	189,316	8,199	7,570	19,136	19,095	11,092	608	10,194
45	Revenue Related	-Revenue	R1	(46,333)	(17,315)	(863)	(2,022)	(19,059)	(607)	(3,930)	(217)	(706)	(391)	(13)	(1,208)
46	Direct Assigned	Direct	376,772												376,772
47	Subtotal - Distribution		17,244,082	7,894,430	419,729	1,000,202	5,335,858	239,842	1,204,648	123,438	270,353	161,361	5,075	589,146	
48	Total		42,819,417	17,531,674	909,744	1,928,483	16,151,815	664,716	3,540,287	239,747	639,130	357,274	9,822	846,724	

Allocation of Plant in Service To Rate Classes -- BUNDLED

Line No.	Acct. No.	Description	Class. Factor	Residential Service											Lighting		
				Total	General Use 18-RS	Space Heating 18-RS	General Service Small 18-GSS	General Service Large 18-GSL	General Service Space Heating Rider No 1	Industrial Service 18-IS	Municipal Power Service 18-M-I	Water Pumping Service 18-WP	Irrigation Service 18-IP-I	Temporary Service 18-CS			
1		Intangible Plant															
2	301	Organization	PLNT														
3	302	Franchises and consents	PLNT														
4	303	Miscellaneous intangible plant	PLNT														
5	301-303	Subtotal	PLNT														
6																	
7		Production Plant															
8	310-346	Production Plant	PRODI														
9																	
10		Transmission Plant															
11	350-359	Transmission Plant	TRAN1	29,310,492	11,335,385	580,163	1,044,544	12,403,984	498,378	2,497,533	128,771	354,510	196,320	6,126	264,777		
12																	
13		Distribution Plant															
14	360	Land	LAND	16,306	6,586	359	513	6,225	280	1,522	98	294	173	5	252		
15	361	Structures	SUB	59,605	24,075	1,313	1,875	22,754	1,022	5,562	358	1,074	633	18	920		
16	362	Station	SUB	11,003,925	4,444,615	242,366	346,111	4,200,739	188,694	1,026,839	66,161	198,360	116,855	3,246	169,938		
17	363	Battery	SUB														
18	364	Poles, towers	PRI-OH	15,057,486	6,081,896	331,648	473,609	5,748,183	258,205	1,405,100	90,533	271,431	159,902	4,442	232,539		
19	365	OH Cond	PRI-OH	12,961,782	5,235,416	285,489	407,692	4,948,150	222,268	1,209,538	77,933	233,653	137,646	3,823	200,174		
20	366	UG Conduit	PRI-URD														
21	367	UG Cond	PRI-URD	2,975,788	1,201,956	65,543	93,599	1,136,005	51,029	277,688	17,892	53,643	31,601	878	45,956		
22	368	Transf	TRF	7,667,021	3,688,857	253,571	373,522	2,476,114	115,150	429,096	97,671	109,508	82,576	2,200	38,756		
23	369	Services	SERV	1,633,235	1,102,892	52,346	257,391	171,549	7,430	2,380	14,272	9,789	5,769	530	8,887		
24	370	Meters	MTR	5,910,592	3,981,910	188,993	904,900	595,900	25,809	23,828	60,233	60,104	34,913	1,914	32,088		
25	371	Cons Premise	ICON	345,457	139,534	7,609	10,866	131,878	5,924	32,237	2,077	6,227	3,669	102	5,335		
26	372	Leased Prop	LICON														
27	373	St. Light	STL	1,477,369											1,477,369		
28	360-373	Subtotal		59,108,566	25,907,737	1,429,236	2,870,076	19,437,495	875,810	4,413,789	427,229	944,084	573,736	17,158	2,212,215		
29																	
30		General Plant															
31	389	Land & Land Rights	PLNT	272,812	114,912	6,200	12,078	98,245	4,240	21,325	1,716	4,007	2,376	72	7,643		
32	390	Structures and Improve.	PLNT	6,807,460	2,867,380	154,705	301,390	2,451,503	105,800	532,109	42,807	99,980	59,287	1,793	190,706		
33	391	Office Furniture & Equip.	PLNT	722,811	304,456	16,426	32,001	260,299	11,234	56,499	4,545	10,616	6,295	190	20,249		
34	392	Transportation & Equipment	PLNT	3,998,692	1,684,295	90,874	177,036	1,440,009	62,147	312,560	25,145	58,728	34,825	1,053	112,020		
35	393	Stores Equipment	PLNT	368,215	155,096	8,368	16,302	132,602	5,723	28,782	2,315	5,408	3,207	97	10,315		
36	394	Tool, Shop & Garage Equip.	PLNT	64,829	27,307	1,473	2,870	23,346	1,008	5,067	408	952	565	17	1,816		
37	395	Laboratory Equipment	PLNT	291,250	122,678	6,619	12,895	104,885	4,527	22,766	1,831	4,278	2,537	77	8,159		
38	396	Power Operated Equipment	PLNT	122,810	51,729	2,791	5,437	44,226	1,909	9,600	772	1,804	1,070	32	3,440		
39	397	Communication Equipment	PLNT	344,385	145,059	7,826	15,247	124,020	5,352	26,919	2,166	5,058	2,999	91	9,648		
40	398	Miscellaneous Equipment	PLNT	146,092	61,536	3,320	6,468	52,611	2,271	11,419	919	2,146	1,272	38	4,093		
41	399	Other tangible property	PLNT														
42	389-399	Subtotal		13,139,357	5,534,448	298,603	581,725	4,731,746	204,209	1,027,045	82,623	192,975	114,433	3,460	368,089		
43																	
44		Total Plant		101,558,415	42,777,570	2,308,003	4,496,345	36,573,225	1,578,397	7,938,367	638,624	1,491,570	884,489	26,744	2,845,081		

Allocation of Revenue Requirements to Rate Classes -- BUNDLED

Line No.	Acct. No.	Description	Class. Factor	Total	Residential Service	Residential	General Service	General Service	General Service	Industrial	Municipal Power	Water Pumping	Irrigation	Temporary	Lighting	
					General Use	Space Heating	Small	Large	Space Heating	Service	Service	Service	Service	Service		
					18-RS	18-RS	18-GSS	18-GSL	Rider No 1	18-IS	18-M-I	18-WP	18-IP-I	18-CS		
1		Power Supply														
2		Production														
3	500-557	Fuel	FUEL													
4	500-557	Non-Fuel O&M - Demand	PRODI													
5	500-557	Non-Fuel O&M - Energy	PRODI													
6		Subtotal - Production														
7		Purchases														
8	555	Direct Assign. Chgs (Cr.)														
9	555	Substation Charges	PURSUB													
10	555	Demand Charges	PURKW-1													
11	555	MKEC - Summer	PURKW-2	3,024,070	1,472,771	39,785	97,416	1,052,921	39,541	212,874	15,359	37,231	50,465	397	5,311	
12	555	MKEC - Winter	PURKW-3	3,624,566	1,226,389	83,428	135,681	1,672,210	68,709	336,192	14,778	43,667	6,240	884	36,389	
12	555	Total Demand		6,648,636	2,699,160	123,213	233,097	2,725,131	108,250	549,066	30,137	80,898	56,704	1,281	41,700	
13	555	Energy Charges	PURKWH-1	11,132,967	3,927,770	212,778	417,185	4,792,686	184,254	1,120,135	51,873	192,725	86,639	1,845	145,076	
14	555	ECA Charges	PURKWH-2													
15	555	Contract Energy	PURKWH-3													
16		Total Energy		11,132,967	3,927,770	212,778	417,185	4,792,686	184,254	1,120,135	51,873	192,725	86,639	1,845	145,076	
17	555	Revenue Related Charges	REVENUE													
18		Subtotal - Purchases		17,781,603	6,626,930	335,991	650,282	7,517,817	292,504	1,669,201	82,010	273,623	143,343	3,126	186,777	
19	500-557	Total Power Supply		17,781,603	6,626,930	335,991	650,282	7,517,817	292,504	1,669,201	82,010	273,623	143,343	3,126	186,777	
20		Transmission														
21	560-573	Operation & Maintenance	TRAN1	548,530	212,135	10,857	19,548	232,134	9,327	46,740	2,410	6,634	3,674	115	4,955	
23	555	Transmission - MKEC	TRAN3	3,817,140	1,476,221	75,555	136,032	1,615,385	64,904	325,257	16,770	46,168	25,567	798	34,482	
26		Total Transmission		4,365,670	1,688,356	86,413	155,580	1,847,519	74,231	371,997	19,180	52,803	29,241	912	39,437	
27		Distribution														
28	580	Oper. Super & Eng.	EX1	503,968	220,719	11,664	25,047	166,759	7,478	39,153	3,298	8,297	4,881	148	16,524	
29	581	Load Dispatch	EX1													
30	582	Oper. Station	SUB	485,632	196,152	10,696	15,275	185,389	8,328	45,317	2,920	8,754	5,157	143	7,500	
31	583	Oper. OH Line	PRI-OH	1,322,742	534,271	29,134	41,605	504,956	22,682	123,433	7,953	23,844	14,047	390	20,428	
32	584	Oper. UG Line	PRI-UG	248,803	100,494	5,480	7,826	94,980	4,266	23,217	1,496	4,485	2,642	73	3,842	
33	585	Oper. St. Lighting	STL	49,298											49,298	
34	586	Oper. Meters	MTR	398,015	268,139	12,727	60,935	40,127	1,738	1,605	4,056	4,047	2,351	129	2,161	
35	587	Oper. Cons. Install	ICON	64,125	25,901	1,412	2,017	24,480	1,100	5,984	386	1,156	681	19	990	
36	588	Oper. Misc. Oper.	EX1	1,122,510	491,618	25,980	55,788	371,429	16,656	87,208	7,346	18,480	10,872	330	36,804	
37	589	Rents	EX1													
38	590	Main. Super. & Eng.	EX2	193,957	75,758	4,134	5,960	71,226	3,200	17,383	1,132	3,365	1,984	55	9,760	
39	591	Main. Structure	SUB													
40	592	Main. Station	SUB	146,099	59,011	3,218	4,595	55,773	2,505	13,633	878	2,634	1,551	43	2,256	
41	593	Main. OH Line	PRI-OH	1,059,327	427,875	23,332	33,319	404,397	18,165	98,852	6,369	19,096	11,249	312	16,360	
42	594	Main. UG Line	PRI-UG	12,917	5,217	285	406	4,931	222	1,205	78	233	137	4	199	
43	595	Main. Line Transf.	TRF	4,859	2,338	161	237	1,569	73	272	62	69	52	1	25	
44	596	Main. St. Lighting	STL	45,133											45,133	
45	597	Main. Meters	MTR	3,390	2,284	108	519	342	15	14	35	34	20	1	18	
46	598	Main. Misc. Dist.	EX2	239,993	93,739	5,115	7,374	88,132	3,959	21,509	1,401	4,164	2,455	68	12,076	
47	580-598	Subtotal		5,900,769	2,503,517	133,445	260,903	2,014,492	90,387	478,784	37,409	98,659	58,081	1,718	223,374	

Allocation of Revenue Requirements to Rate Classes -- BUNDLED
(Continued)

Line No.	Acct. No.	Description	Class. Factor	Residential Service											Lighting		
				Total	General Use 18-RS	Space Heating 18-RS	General Service Small 18-GSS	General Service Large 18-GSL	General Service Space Heating Rider No 1	Industrial Service 18-IS	Municipal Power Service 18-M-I	Water Pumping Service 18-WP	Irrigation Service 18-IP-I	Temporary Service 18-CS			
48		Consumer Acct., Service & Sales															
49		Consumer Accounting															
50	901	Supervision	CACC														
51	902	Meter Reading Expense	CACC	39,525	26,628	1,264	6,051	3,985	173	159	403	402	233	13	215		
52	903	Records & Collections	CACC	1,063,764	716,648	34,014	162,860	107,248	4,645	4,288	10,841	10,817	6,283	345	5,775		
53	904	Uncollectible Accounts	CACC	65,837	44,354	2,105	10,080	6,638	287	265	671	669	389	21	357		
54	905	Misc. Customer Account	CACC	41,977	28,279	1,342	6,427	4,232	183	169	428	427	248	14	228		
55		Subtotal		1,211,103	815,909	38,725	185,418	122,102	5,288	4,882	12,342	12,315	7,154	392	6,575		
56		Consumer Service & Info.															
57	907	Supervision	CS	11,546	7,778	369	1,768	1,164	50	47	118	117	68	4	63		
58	908	Customer Assistance	CS	179,478	120,913	5,739	27,478	18,095	784	724	1,829	1,825	1,060	58	974		
59	909	Info. & Instruction	CS														
60	910	Misc. Cust Serv. & Info	CS	21,233	14,304	679	3,251	2,141	93	86	216	216	125	7	115		
61		Subtotal		212,257	142,995	6,787	32,496	21,400	927	856	2,163	2,158	1,254	69	1,152		
62		Sales															
63	911	Supervision	SALES														
64	912	Demonstrating & Selling	SALES	6,649	4,479	213	1,018	670	29	27	68	68	39	2	36		
65	913	Advertising	SALES														
66	916	Misc. Sales	SALES														
67		Subtotal		6,649	4,479	213	1,018	670	29	27	68	68	39	2	36		
68		Prorated Operating Expenses															
69		Administrative & General															
70	920	Administrative & General		1,080,780													
71	921	Office Supplies & Expenses		105,125													
72	922	Admin. Expenses Transferred															
73	923	Outside Services Employed		293,629													
74	924	Property Insurance															
75	925	Injuries & Damages															
76	926	Employee Pensions & Benefits															
77	927	Franchise Requirements															
78	928	Regulatory Commission Exp.		70,277													
79	929	Duplicate Charges		(79,931)													
80	930.1	General Advertising		9,700													
81	930.2-930.31	Misc.		234,187													
82	931	Rents															
83	932	Maint. of General Plant		126,264													
84		Accounts 920-935		1,840,031													
85		Power Supply	EX6-PS	184,003	68,575	3,477	6,729	77,794	3,027	17,273	849	2,831	1,483	32	1,933		
86		Transmission	EX6-TR	91,288	35,304	1,807	3,253	38,633	1,552	7,779	401	1,104	611	19	825		
87		Distribution	EX6-D	1,564,740	740,003	38,244	102,420	460,762	20,626	103,426	11,095	24,162	14,200	466	49,336		
88		Subtotal - A&G		1,840,031	843,882	43,527	112,402	577,189	25,205	128,478	12,345	28,098	16,295	517	52,093		

Allocation of Revenue Requirements to Rate Classes -- BUNDLED
(Continued)

Line No.	Acct. No.	Description	Class. Factor	Total	Residential Service General Use 18-RS	Residential Space Heating 18-RS	General Service Small 18-GSS	General Service Large 18-GSL	General Service Space Heating Rider No 1	Industrial Service 18-IS	Municipal Power Service 18-M-I	Water Pumping Service 18-WP	Irrigation Service 18-IP-I	Temporary Service 18-CS	Lighting
89	408	Other Taxes													
90		Power Supply	EX6-PS												
91		Transmission	EX6-TR												
92		Distribution	REV	(46,333)	(17,315)	(863)	(2,022)	(19,059)	(607)	(3,930)	(217)	(706)	(391)	(13)	(1,208)
93		Subtotal - Other Taxes		(46,333)	(17,315)	(863)	(2,022)	(19,059)	(607)	(3,930)	(217)	(706)	(391)	(13)	(1,208)
94	421-	Miscellaneous Expense													
95	426,431	Power Supply	EX6-PS	85,926	32,023	1,624	3,142	36,328	1,413	8,066	396	1,322	693	15	903
96		Transmission	EX6-TR	42,630	16,486	844	1,519	18,041	725	3,632	187	516	286	9	385
97		Distribution	EX6-D	730,703	345,567	17,859	47,828	215,167	9,632	48,298	5,181	11,283	6,631	217	23,039
98		Subtotal - Misc. Expense		859,258	394,076	20,326	52,490	269,536	11,770	59,996	5,765	13,121	7,609	241	24,326
99		Fixed Charges													
100	403-	Depreciation													
101	407	Power Supply	PROPLNT												
102		Transmission	TRNPLNT	801,970	310,149	15,874	28,580	339,388	13,636	68,335	3,523	9,700	5,372	168	7,245
103		Distribution	DSTPLNT	1,769,329	775,510	42,782	85,912	581,833	26,216	132,120	12,788	28,260	17,174	514	66,219
104		Subtotal - Depreciation		2,571,298	1,085,660	58,656	114,491	921,221	39,852	200,456	16,312	37,960	22,546	681	73,464
105	408	Property Taxes													
106		Power Supply	REV												
107		Transmission	REV												
108		Distribution	REV												
109		Subtotal - Property Taxes													
110															
111		Total Oper. Expenses		30,885,165	12,612,269	647,666	1,427,025	11,657,501	474,682	2,585,489	170,607	471,930	259,604	6,848	571,544
112															
113	427	Interest-LT													
114		Power Supply	PROPLNT												
115		Transmission	TRNPLNT	1,307,821	505,780	25,887	46,607	553,460	22,237	111,439	5,746	15,818	8,760	273	11,814
116		Distribution	DSTPLNT	3,469,208	1,520,581	83,885	168,451	1,140,828	51,403	259,055	25,075	55,410	33,674	1,007	129,840
117		Subtotal - Interest-LT		4,777,030	2,026,361	109,772	215,058	1,694,289	73,641	370,494	30,821	71,228	42,434	1,280	141,654
118		Required Margin													
119		Power Supply	PROPLNT												
120		Transmission	TRNPLNT	914,424	353,639	18,100	32,588	386,977	15,548	77,918	4,017	11,060	6,125	191	8,260
121		Distribution	DSTPLNT	2,425,658	1,063,184	58,652	117,780	797,663	35,941	181,130	17,532	38,743	23,545	704	90,783
122		Subtotal - Required Margin		3,340,082	1,416,824	76,752	150,368	1,184,640	51,489	259,048	21,550	49,803	29,669	895	99,044
123		Summary of Revenue Requirements													
124		Power Supply		18,051,532	6,727,528	341,092	660,153	7,631,939	296,944	1,694,539	83,255	277,777	145,519	3,174	189,612
125		Transmission		7,523,803	2,909,716	148,924	268,127	3,184,018	127,930	641,100	33,055	91,000	50,394	1,573	67,966
126		Distribution		17,244,082	7,894,430	419,729	1,000,202	5,335,858	239,842	1,204,648	123,438	270,353	161,361	5,075	589,146
127		Total Rev. Req.		42,819,417	17,531,674	909,744	1,928,483	16,151,815	664,716	3,540,287	239,747	639,130	357,274	9,822	846,724

Rate Class Weighting Factors

I. Three Phase Vs. Single Phase Class Weighting Factors

A. Investment to Serve 3Ø vs. 1Ø Consumers (use replacement cost) ¹			
	<u>1Ø</u>		<u>3Ø</u>
1. kWh & kW Meter - Type 2, 7	\$325		\$400
2. kWh, kW, PF Meter - Type 6			\$550
3. kWh, kW, PF, CP/PT Meter - Type 5			\$1,600
4. Service ¹	\$300		\$459
5. Transformer ²	\$2,764		\$4,358
6. Primary Line ³	\$855		\$1,350
B. Weighting Factors for Relative 3Ø Class Investment Costs			
1. General Service Small	450 ÷	\$325 =	1.38
2. General Service Large	469 ÷	\$325 =	1.44
3. Industrial Service	1,375 ÷	\$325 =	4.23
4. Irrigation Service	831 ÷	\$325 =	2.56
5. Municipal Service	795 ÷	\$325 =	2.45
6. Water Pumping Service	713 ÷	\$325 =	2.19
7. Service	\$459 ÷	\$300 =	1.53
8. Transformer	\$4,358 ÷	\$2,764 =	1.58
9. Primary Line	\$1,350 ÷	\$855 =	1.58

¹ Single phase meter costs represent weighted cost by meter type (Type 1, Type 2, and Type 3).

² Assume a typical installation of 80 feet of 1/0 triplex (or quadriplex), pole and miscellaneous materials to estimate the difference between a 1Ø and 3Ø installation.

³ Use the cost difference between 1-75 kVA transformer and 3-25 kVA transformers as representative of the difference between a 1Ø versus a 3Ø transformer installation.

⁴ Assume a typical installation of 150 feet of 1/0 ACSR to estimate the difference in primary line between a 1Ø and 3Ø installation.

Estimate of Class Demands Summary

Description	Total System	Residential Service General Use 18-RS	Residential Space Heating 18-RS	General Service Small 18-GSS	General Service Large 18-GSL	General Service Space Heating Rider No 1	Industrial Service 18-IS	Municipal Service 18-M-I	Water Pumping Water Service 18-WP	Irrigation Service 18-IP-I	Temporary Service 18-CS	Lighting
<u>Class Billing Determinants</u>												
Number of Consumers	21,611	11,960	568	2,521	1,408	61	17	140	71	41	6	4,819
Energy (MWh)	302,954	106,884	5,790	11,353	130,420	5,014	30,481	1,412	5,245	2,358	50	3,948
Billing Demand (kW)	1,352,574	698,988	42,861	54,520	390,065	19,765	98,985	11,158	25,057	10,918	258	n/a
<u>Estimated Demand Responsibility</u>												
Non-Coincident Consumer Demand	184,339	88,691	6,097	8,981	59,533	2,769	10,317	2,348	2,633	1,985	53	932
Non-Coincident Class Demand	63,817	25,777	1,406	2,007	24,362	1,094	5,955	384	1,150	678	19	986
Allocated Coincident Class Demand - MKEC Avg Monthly	54,883	21,225	1,086	1,956	23,226	933	4,677	241	664	368	11	496
Allocated Coincident Class Demand - MKEC Summer	74,011	36,044	974	2,384	25,769	968	5,210	376	911	1,235	10	130
Allocated Coincident Demand - MKEC Winter	48,507	16,412	1,116	1,816	22,379	920	4,499	198	584	84	12	487

Month	Peak Time	Data Type	Rate Class										
			18-RS General Service	18-RS Space Heat	18-GSS	18-GSL	GSL Rider 1	18-IS	18-MI-1	18-WP	18-IP-1	18-CS	
January	N/A	Total kWh (Individually normalized for missing readings)	8,462,965	850,247	1,073,782	10,692,559	427,055	2,680,617	103,257	377,043	2,129,38	12,045.56	
		Customers (Daily Avg)	12,200	645	2,421	1,413	57	17	139	69	29	9	
		kWh per Customer	694	1,316	444	7,567	7,492	157,683	743	5,464	73.43	1,338.40	
	N/A	Sum of Maximum kW	52,559.8	4,755	4,369.9	35,493.3	1,590.1	6,552.0	336.0	1,806.9	58.51	33.28	
		Customers (Daily Avg)	12,200	645	2,421	1,413	57	17	139	69	29	9	
		kW per Customer	4.3	7.4	1.8	25.1	27.9	385.4	2.4	26.2	2.02	3.70	
	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	1/5/17 20:00	1/7/17 9:00	1/5/17 17:00	1/5/17 11:00	1/7/17 7:00	1/9/17 20:00	1/5/17 9:00	1/6/17 19:00	1/31/17 13:00	1/5/17 8:00	
		Maximum kW (Class NCP)	18,248.1	2,257.8	1,950.1	21,787.4	1,035.5	5,508.7	187.1	881.7	33.17	27.55	
Customers (Daily Avg)		12,171	645	2,407	1,389	57	17	137	69	29	9		
01/16/18 HE 11	kW at System CP (Hour in Column C) Coincident To MKEC	13,234.3	1,972.7	1,930.1	21,787.4	1,023.7	4,156.7	169.0	465.2	1.33	26.14		
	Customers (Daily Avg)	12,171	645	2,407	1,389	57	17	137	69	28	9		
	CP kW per Customer (Coincident to MKEC)	1.09	3.06	0.8	15.7	17.9	244.5	1.2	6.7	0.05	2.90		
February	N/A	Total kWh (Individually normalized for missing readings)	6,310,269	550,752	812,843	9,323,743	270,217	2,145,540	84,340	314,344	4,742.17	9,115.79	
		Customers (Daily Avg)	12,177	647	2,405	1,414	57	17	139	69	29	9	
		kWh per Customer	518	851	338	6,594	4,741	126,208	607	4,556	163.52	1,012.87	
	N/A	Sum of Maximum kW	49,281.6	4,387.5	3,891.6	33,953.3	1,186.7	6,033.4	453.6	2,079.4	131.16	28.81	
		Customers (Daily Avg)	12,177	647	2,405	1,414	57	17	139	69	29	9	
		kW per Customer	4.0	6.8	1.6	24.0	20.8	354.9	3.3	30.1	4.52	3.20	
	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	2/2/17 21:00	2/3/17 8:00	2/2/17 11:00	2/9/17 10:00	2/2/17 19:00	2/2/17 11:00	2/14/17 12:00	2/8/17 15:00	2/28/17 18:00	2/15/17 7:00	
		Maximum kW (Class NCP)	15,094.5	1,721.3	1,647.5	20,406.3	728.2	5,279.6	209.1	1,002.8	94.54	27.23	
Customers (Daily Avg)		12,154	644	2,384	1,402	57	17	136	69	29	9		
02/06/18 HE 20	NCP kW per Customer	1.2	2.7	0.7	14.6	14.6	310.6	1.5	14.5	3.26	3.03		
	kW at System CP (Hour in Column C) Coincident To MKEC	10,916.7	1,405.1	1,647.5	19,512.7	627.7	5,279.6	162.7	430.1	1.92	19.77		
	Customers (Daily Avg)	12,154	644	2,384	1,403	57	17	138	69	29	9		
March	N/A	Total kWh (Individually normalized for missing readings)	6,509,304	495,356	822,864	9,431,931	254,419	2,758,194	88,958	404,563	62,434.24	4,554.45	
		Customers (Daily Avg)	12,193	648	2,411	1,414	58	17	137	69	29	9	
		kWh per Customer	534	764	341	6,670	4,387	162,247	649	5,863	2,152.90	508.94	
	N/A	Sum of Maximum kW	51,818.3	4,115.5	3,940.2	34,671.6	1,079.0	7,380.0	573.8	2,232.6	421.35	25.19	
		Customers (Daily Avg)	12,193	648	2,411	1,414	58	17	137	69	29	9	
		kW per Customer	4.2	6.4	1.6	24.5	18.6	434.1	4.2	32.4	14.53	2.80	
	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	3/19/17 19:00	3/2/17 8:00	3/13/17 11:00	3/20/17 15:00	3/10/17 20:00	3/23/17 17:00	3/23/17 20:00	3/16/17 23:00	3/16/17 21:00	3/7/17 8:00	
		Maximum kW (Class NCP)	16,843.6	1,393.6	1,451.2	19,900.6	591.7	6,146.9	234.7	1,011.2	232.34	18.80	
Customers (Daily Avg)		12,152	647	2,398	1,404	57	17	137	68	29	8		
03/07/18 HE 9	NCP kW per Customer	1.4	2.2	0.6	14.2	10.4	361.6	1.7	14.9	8.01	2.35		
	kW at System CP (Hour in Column C) Coincident To MKEC	9,331.6	1,163.6	1,383.2	16,558.6	461.2	4,393.8	146.1	582.2	23.74	7.03		
	Customers (Daily Avg)	12,154	648	2,399	1,404	57	17	137	69	29	8		
April	N/A	Total kWh (Individually normalized for missing readings)	6,308,782	422,521	750,091	8,997,743	236,305	2,323,109	83,832	380,548	22,598.17	2,161.01	
		Customers (Daily Avg)	12,211	649	2,409	1,414	58	18	137	68	29	8	
		kWh per Customer	517	651	311	6,363	4,074	129,062	612	5,596	779.25	270.13	
	N/A	Sum of Maximum kW	53,760.6	4,015.1	3,918.9	33,916.6	1,145.0	7,163.3	976.0	2,121.3	176.42	15.55	
		Customers (Daily Avg)	12,211	649	2,409	1,414	58	18	137	68	29	8	
		kW per Customer	4.4	6.2	1.6	24.0	19.7	398.0	7.1	31.2	6.08	1.94	
	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	4/19/17 19:00	4/30/17 14:00	4/19/17 16:00	4/19/17 15:00	4/4/17 19:00	4/7/17 22:00	4/18/17 21:00	4/26/17 23:00	4/19/17 14:00	4/26/17 8:00	
		Maximum kW (Class NCP)	19,874.5	1,426.1	1,490.8	21,666.0	628.8	5,838.6	325.3	992.8	122.60	15.53	
Customers (Daily Avg)		12,155	635	2,392	1,404	58	17	137	68	29	7		
04/12/18 HE 16	NCP kW per Customer	1.6	2.2	0.6	15.2	10.8	343.4	2.4	14.6	4.23	2.22		
	kW at System CP (Hour in Column C) Coincident To MKEC	14,732.8	550.6	1,490.8	21,115.7	457.7	3,952.9	183.3	506.1	121.07	6.14		
	Customers (Daily Avg)	12,155	641	2,392	1,404	58	18	137	68	29	8		
May	N/A	Total kWh (Individually normalized for missing readings)	7,316,828	366,249	783,245	9,607,936	243,824	2,432,309	96,464	388,864	39,853.25	1,886.96	
		Customers (Daily Avg)	12,280	637	2,412	1,407	58	17	137	68	29	7	
		kWh per Customer	596	575	325	6,829	4,204	143,077	704	5,719	1,374.25	269.57	
	N/A	Sum of Maximum kW	58,256.8	3,474.5	4,237.0	35,845.7	1,053.9	6,056.7	1,268.3	2,190.9	841.62	28.46	
		Customers (Daily Avg)	12,280	637	2,412	1,407	58	17	137	68	29	7	
		kW per Customer	4.7	5.5	1.8	25.5	18.2	356.3	9.3	32.2	29.02	4.07	
	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	5/15/17 18:00	5/1/17 8:00	5/31/17 15:00	5/15/17 15:00	5/15/17 19:00	5/26/17 10:00	5/30/17 22:00	5/25/17 6:00	5/29/17 19:00	5/1/17 8:00	
		Maximum kW (Class NCP)	23,385.8	1,103.6	1,668.4	22,115.8	597.8	5,416.5	425.6	903.7	354.29	17.24	
Customers (Daily Avg)		12,155	636	2,396	1,401	58	17	137	68	29	7		
05/31/18 HE 16	NCP kW per Customer	1.9	1.7	0.7	15.8	10.3	318.6	3.1	13.3	12.22	2.46		
	kW at System CP (Hour in Column C) Coincident To MKEC	18,884.9	667.1	1,587.0	21,922.2	502.8	3,995.2	210.4	548.5	47.07	8.12		
	Customers (Daily Avg)	12,155	621	2,396	1,401	58	17	137	68	29	6		
June	N/A	Total kWh (Individually normalized for missing readings)	12,474,218	386,532	964,829	11,426,500	305,465	2,697,375	183,668	577,314	314,905.87	1,390.85	
		Customers (Daily Avg)	12,236	553	2,407	1,409	58	17	138	68	29	6	
		kWh per Customer	1,014	699	401	8,110	5,267	158,669	1,331	8,490	10,858.82	231.81	
	N/A	Sum of Maximum kW	69,462.1	2,767.3	4,767.8	41,553.0	1,097.3	8,405.6	1,516.9	2,256.7	1,364.40	6.29	
		Customers (Daily Avg)	12,296	553	2,407	1,409	58	17	138	68	29	6	
		kW per Customer	5.6	5.0	2.0	29.5	18.9	494.4	11.0	33.2	47.05	1.05	
	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	6/17/17 18:00	6/17/17 18:00	6/21/17 16:00	6/21/17 16:00	6/21/17 19:00	6/21/17 13:00	6/15/17 22:00	6/28/17 23:00	6/29/17 1:00	6/28/17 17:00	
		Maximum kW (Class NCP)	38,267.8	1,015.5	2,242.5	26,194.3	781.1	6,240.6	613.9	1,423.1	1,085.71	6.29	
Customers (Daily Avg)		12,228	553	2,397	1,397	58	17	137	68	29	5		
06/28/18 HE 16	NCP kW per Customer	3.1	1.9	0.9	18.8	13.5	367.1	4.5	20.9	37.44	1.26		
	kW at System CP (Hour in Column C) Coincident To MKEC	33,293.9	873.4	2,242.5	26,194.3	683.2	5,811.1	382.4	945.4	443.80	6.17		
	Customers (Daily Avg)	12,237	555	2,392	1,397	58	17	137	68	29	5		
06/28/18 HE 16	CP kW per Customer (Coincident to MKEC)	2.7	1.6	0.9	18.8	11.8	341.8	2.8	13.9	15.30	1.23		

Month	Peak Time	Data Type	Rate Class										
			18-RS General Service	18-RS Space Heat	18-GSS	18-GSL	GSL Rider 1	18-IS	18-MI-I	18-WP	18-IP-I	18-CS	
July	N/A	Total kWh (Individually normalized for missing readings)	15,852,765	461,121	1,111,275	12,959,562	313,943	2,255,218	196,122	632,619	718,236.93	2,696.26	
		Customers (Daily Avg)	12,289	538	2,410	1,419	57	132,660	461	1,411	9,303	24,766.79	539.25
	N/A	kWh per Customer	1,290	827	913	5,508							
		Sum of Maximum kW	72,248.3	2,830.6	5,063.8	42,056.6	1,103.3	7,128.2	1,231.7	2,201.2	1,423.00	19.03	
	Listed By Class	Customers (Daily Avg)	12,289	538	2,410	1,419	57	132,660	461	1,411	9,303	24,766.79	539.25
		kW per Customer	5.9	5.3	2.1	29.6	19.4	419.3	8.9	32.4	49.07	3.81	
07/12/18 HE 15	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	7/22/17 18:00	7/22/17 18:00	7/25/17 16:00	7/19/17 16:00	7/26/17 20:00	7/6/17 14:00	7/6/17 22:00	7/12/17 8:00	7/22/17 10:00	7/18/17 11:00	
		Maximum kW (Class NCP)	39,141.7	1,091.5	2,317.7	25,901.9	791.4	5,572.1	606.7	1,377.6	1,315.38	16.29	
August	N/A	Total kWh (Individually normalized for missing readings)	11,980,830	380,188	960,393	11,623,418	313,620	2,407,474	167,823	495,769	378,658.32	3,182.78	
		Customers (Daily Avg)	12,266	532	2,413	1,413	58	137,139	461	1,411	9,303	24,766.79	539.25
	N/A	kWh per Customer	977	715	398	8,226	5,407	141,616	1,207	7,185	13,057.18	636.56	
		Sum of Maximum kW	66,782.0	2,669.3	4,659.9	40,066.7	1,008.1	6,771.9	1,245.8	2,044.2	1,458.09	16.46	
	Listed By Class	Customers (Daily Avg)	12,266	532	2,413	1,413	58	137,139	461	1,411	9,303	24,766.79	539.25
		kW per Customer	5.4	5.0	1.9	28.4	17.4	398.3	9.0	29.6	50.28	3.29	
08/09/18 HE 15	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	8/19/17 18:00	8/19/17 17:00	8/2/17 16:00	8/15/17 15:00	8/20/17 19:00	8/30/17 14:00	8/23/17 21:00	8/3/17 6:00	8/4/17 23:00	8/2/17 8:00	
		Maximum kW (Class NCP)	34,745.5	963.7	1,903.0	24,008.7	659.7	5,298.0	366.4	1,234.3	1,226.25	13.16	
September	N/A	Total kWh (Individually normalized for missing readings)	9,554,520	322,980	845,008	11,455,507	266,698	2,313,440	126,526	497,843	168,922.01	1,319.22	
		Customers (Daily Avg)	12,240	532	2,430	1,402	58	138	69	30	5		
	N/A	kWh per Customer	784	607	348	8,171	4,598	128,524	917	7,215	5,630.75	263.84	
		Sum of Maximum kW	63,794.0	2,540.6	4,425.9	42,012.8	980.8	6,240.5	1,468.7	2,059.7	1,275.34	18.67	
	Listed By Class	Customers (Daily Avg)	12,240	532	2,430	1,402	58	138	69	30	5		
		kW per Customer	5.2	4.8	1.8	30.0	16.9	346.7	10.6	29.9	42.51	3.73	
09/19/18 HE 16	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	9/3/17 18:00	9/4/17 19:00	9/14/17 16:00	9/22/17 15:00	9/13/17 19:00	9/21/17 21:00	9/15/17 21:00	9/22/17 6:00	9/1/17 16:00	9/19/17 8:00	
		Maximum kW (Class NCP)	31,215.4	867.2	1,942.0	27,820.0	696.7	5,566.3	480.3	1,281.2	1,836.69	12.89	
October	N/A	Total kWh (Individually normalized for missing readings)	6,629,568	314,357	746,532	12,346,701	230,848	2,509,965	94,002	388,986	240,137.4	1,046.03	
		Customers (Daily Avg)	12,239	533	2,424	1,390	57	138	69	30	5		
	N/A	kWh per Customer	542	590	308	8,382	4,050	167,321	681	5,637	806.81	209.21	
		Sum of Maximum kW	54,869.6	2,992.5	3,996.6	42,132.2	934.5	5,909.2	1,236.1	1,931.1	456.81	13.31	
	Listed By Class	Customers (Daily Avg)	12,239	533	2,424	1,390	57	138	69	30	5		
		kW per Customer	4.5	5.6	1.6	30.3	16.4	393.9	9.0	28.0	15.23	2.66	
10/03/18 HE 16	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	10/6/17 18:00	10/28/17 9:00	10/6/17 16:00	10/6/17 15:00	10/6/17 14:00	10/26/17 17:00	10/12/17 20:00	10/26/17 10:00	10/22/17 20:00	10/28/17 8:00	
		Maximum kW (Class NCP)	22,061.0	878.0	1,550.6	25,097.5	479.6	3,390.1	473.2	910.8	166.86	10.94	
November	N/A	Total kWh (Individually normalized for missing readings)	6,593,846	407,762	800,956	10,847,026	261,690	2,056,990	85,097	343,756	363,931.0	2,021.17	
		Customers (Daily Avg)	12,170	533	2,412	1,386	58	137	69	30	5		
	N/A	kWh per Customer	542	765	332	7,826	4,512	137,133	612	4,982	1,248.03	404.23	
		Sum of Maximum kW	50,003.4	3,167.6	3,785.2	36,049.3	1,097.4	5,959.6	499.1	1,855.9	526.86	13.17	
	Listed By Class	Customers (Daily Avg)	12,170	533	2,412	1,386	58	137	69	30	5		
		kW per Customer	4.1	5.9	1.6	26.0	18.9	397.3	3.6	26.9	18.17	2.63	
11/13/18 HE 10	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	11/7/17 20:00	11/19/17 9:00	11/7/17 12:00	11/21/17 11:00	11/10/17 21:00	11/29/17 13:00	11/3/17 21:00	11/17/17 22:00	11/1/17 20:00	11/30/17 9:00	
		Maximum kW (Class NCP)	13,519.7	960.3	1,969.0	20,213.4	595.3	4,697.6	241.0	825.9	225.42	13.16	
December	N/A	Total kWh (Individually normalized for missing readings)	8,615,072	665,921	997,065	11,149,599	396,518	2,391,687	100,332	353,121	16,299.74	3,264.78	
		Customers (Daily Avg)	12,162	528	2,411	1,381	59	138	69	30	5		
	N/A	kWh per Customer	708	1,261	414	8,074	6,721	159,446	717	5,118	562.06	816.19	
		Sum of Maximum kW	54,354.2	3,910.6	4,188.7	36,368.7	1,600.0	6,794.7	342.5	1,849.6	150.94	11.00	
	Listed By Class	Customers (Daily Avg)	12,162	528	2,411	1,381	59	138	69	30	5		
		kW per Customer	4.5	7.4	1.7	26.3	27.1	453.0	2.4	26.8	5.20	2.75	
12/07/18 HE 12	Listed By Class	NCP Time (Calculated as Hour with highest kW/customer)	12/26/17 19:00	12/26/17 9:00	12/27/17 15:00	12/7/17 11:00	12/26/17 20:00	12/18/17 17:00	12/29/17 9:00	12/29/17 10:00	12/2/17 10:00	12/26/17 9:00	
		Maximum kW (Class NCP)	19,301.6	1,811.0	1,869.5	20,410.1	1,132.3	5,263.9	184.3	983.3	141.12	11.00	
Individual Annual Peak Summary	N/A	Total kWh	106,608,968	5,623,987	10,668,884	129,862,225	3,520,601	28,971,918	1,410,419	5,154,770	1,788,987	44,684	
		Customers (Sum of any customer with at least a single interval reading)	12,657	661	2,627	1,522	59	145	71	30	10		
	N/A	Annual kWh per Customer	8,423	8,508	4,061	85,323	59,671	1,609,551	9,727	72,602	59,633	4,468	
		Sum of Maximum kW	88,463.4	5,921.6	8,439.8	59,278.7	1,944.0	9,805.9	2,346.4	2,587.9	1,506.5	47.1	
	Listed By Class	Customers (Sum of any customer with at least a single interval reading)	12,663	661	2,627	1,522	59	145	71	30	10		
		kW per Customer	7.0	9.0	3.2	38.9	32.9	544.8	16.2	36.4	50.2	4.7	

Demand Calculation

	Total Demand	18-RS General Service	18-RS Space Heat	18-GSS	18-GSL	GSL Rider 1	18-IS	18-MLI	18-WP	18-IP-1	18-CS	Lighting
Non-Coincident Consumer Demand												
Consumer Average Monthly kWh - AMI Data		8,884,081	468,666	889,074	10,821,852	293,383	2,414,326	117,535	429,564	149,082	3,724	
Sum of Max Consumer kW - AMI Data		88,463	5,922	8,944	59,279	1,944	2,346	2,588	1,506	47		
Load Factor		13.7571%	11%	14%	25%	21%	34%	7%	23%	14%	11%	
Test Year Energy (annual kWh)		106,883,802	5,790,181	11,352,578	130,420,192	5,013,974	30,481,488	1,411,591	5,244,505	2,357,658	50,207	
Class Average Monthly kWh - Test Year		8,906,984	482,515	946,048	10,868,349	417,831	2,540,124	117,633	437,042	196,472	4,184	
Line Loss		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Non-Coincident Consumer Demand -Ave Monthly (adjusted to Test Year w/losses)	184,339	88,691	6,097	8,981	59,533	2,769	10,317	2,348	2,633	1,985	53	932
Non-Coincident Class Demand												
Class Average Monthly kWh - AMI Data		8,884,081	468,666	889,074	10,821,852	293,383	2,414,326	117,535	429,564	149,082	3,724	
Non-Coincident Class Demand - AMI Data, Ave Monthly		24,308	1,291	1,784	22,935	726	5,352	362	1,069	486	16	
Load Factor		50.1%	49.7%	68.3%	64.6%	55.3%	61.8%	44.4%	55.0%	42.0%	32.2%	
Test Year Energy (annual kWh)		106,883,802	5,790,181	11,352,578	130,420,192	5,013,974	30,481,488	1,411,591	5,244,505	2,357,658	50,207	
Class Average Monthly kWh - Test Year		8,906,984	482,515	946,048	10,868,349	417,831	2,540,124	117,633	437,042	196,472	4,184	
Line Loss		5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	
Non-Coincident Class Demand -Ave Monthly (adjusted to Test Year w/losses)	63,817	25,777	1,406	2,007	24,362	1,094	5,955	384	1,150	678	19	986
Allocated Coincident Demand - MKEC (Ave Monthly)												
Class Average Monthly kWh - AMI Data		8,884,081	468,666	889,074	10,821,852	293,383	2,414,326	117,535	429,564	149,082	3,724	
Coincident Class Demand - MKEC - AMI Data, Ave Monthly		19,895	992	1,727	21,733	616	4,177	226	613	262	10	
Load Factor		61%	65%	71%	68%	65%	79%	71%	96%	78%	53%	
Test Year Energy (annual kWh)		106,883,802	5,790,181	11,352,578	130,420,192	5,013,974	30,481,488	1,411,591	5,244,505	2,357,658	50,207	
Class Average Monthly kWh - Test Year		8,906,984	482,515	946,048	10,868,349	417,831	2,540,124	117,633	437,042	196,472	4,184	
Line Loss		5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	
Coincident Class Demand - MKEC - Ave Monthly (adjusted to Test Year w/losses)	54,550	21,096	1,080	1,944	23,085	928	4,648	240	660	365	11	493
Ratio	100.00%	38.67%	1.98%	3.56%	42.32%	1.70%	8.52%	0.44%	1.21%	0.67%	0.02%	0.90%
Total System Coincident Demand - MKEC (Ave Monthly)	109,269											
Excluded Coincident Demand - MKEC (Ave Monthly)	54,386											
Allocated Coincident Demand - MKEC (Ave Monthly)	54,883	21,225	1,086	1,956	23,226	933	4,677	241	664	368	11	496
Allocated Coincident Demand - MKEC Summer												
Summer - Class Average Monthly kWh - AMI Data		40,307,812	1,227,842	3,036,496	36,009,480	933,028	7,360,067	547,612	1,705,701	1,411,801	7,270	
Summer Coincident Class Demand - MKEC - AMI Data, Ave Monthly		102,527	2,774	6,193	71,070	1,800	13,031	1,098	2,506	2,716	27	
Load Factor		54%	61%	67%	69%	71%	77%	68%	93%	71%	37%	
Test Year Energy (total summer kWh)		38,096,232	1,158,849	3,142,737	35,101,585	1,348,371	7,910,838	504,063	1,667,190	1,725,718	7,138	
Class Average Monthly Summer kWh - Test Year		12,698,744	386,283	1,047,579	11,700,528	449,457	2,636,946	168,021	555,730	575,239	2,379	
Line Loss		5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	
Coincident Class Demand - MKEC - Ave Monthly (adjusted to Test Year w/losses)	70,149	34,164	923	2,260	24,424	917	4,938	356	864	1,171	9	123
Ratio	100%	48.70%	1.32%	3.22%	34.82%	1.31%	7.04%	0.51%	1.23%	1.67%	0.01%	0.18%
Total System Coincident Demand - MKEC Summer (Ave Monthly)	130,067											
Excluded Coincident Demand - MKEC Summer (Ave Monthly)	56,057											
Allocated Coincident Demand - MKEC Summer (Ave Monthly)	74,011	36,044	974	2,384	25,769	968	5,210	376	911	1,235	10	130
Allocated Coincident Demand - MKEC Winter												
Winter Class Average Monthly kWh - AMI Data		7,366,795	488,461	848,043	10,428,083	287,508	2,401,317	95,867	383,230	41,910	4,157	
Winter Coincident Class Demand - MKEC - AMI Data, Ave Monthly		15,134	1,014	1,615	21,081	621	4,122	180	539	48	10	
Load Factor		67%	66%	72%	68%	63%	80%	73%	97%	120%	58%	
Test Year Energy (total winter kWh)		68,787,570	4,631,352	8,209,841	95,318,607	3,665,603	22,570,650	907,528	3,577,315	631,940	43,069	
Class Average Monthly Winter kWh - Test Year		5,732,298	385,944	684,153	7,943,217	305,467	1,880,888	75,627	298,110	52,662	3,589	
Line Loss		5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	
Coincident Class Demand - MKEC - Ave Monthly (adjusted to Test Year w/losses)	36,812	12,456	847	1,378	16,984	698	3,414	150	443	63	9	370
Ratio	100%	33.84%	2.30%	3.74%	46.14%	1.90%	9.28%	0.41%	1.20%	0.17%	0.02%	1.00%
Total System Coincident Demand - MKEC Winter (Ave Monthly)	102,336											
Excluded Coincident Demand - MKEC Winter (Ave Monthly)	53,829											
Allocated Coincident Demand - MKEC Winter (Ave Monthly)	48,507	16,412	1,116	1,816	22,779	920	4,499	198	584	84	12	487

Development of Allocation Factors -- BUNDLED

Line No.	Description	Units	Total	Residential Service General Use 18-RS	Residential Space Heating 18-RS	General Service Small 18-GSS	General Service Large 18-GSL	General Service Space Heating Rider No 1	Industrial Service 18-IS	Municipal Power Service 18-M-I	Water Pumping Service 18-WP	Irrigation Service 18-IP-I	Temporary Service 18-CS	Lighting
1	Allocation Factor Input Data													
2	Energy													
3	Energy Sales -- All	MWh	302,954	106,884	5,790	11,353	130,420	5,014	30,481	1,412	5,245	2,358	50	3,948
4	Energy Sales -- On-Peak	MWh												
5	Energy Sales -- Off-Peak	MWh												
6	Dist. Losses	MWh	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%	5.77%
7	Energy -- All @ Sub.	MWh	320,427	113,049	6,124	12,007	137,942	5,303	32,240	1,493	5,547	2,494	53	4,176
8	Energy -- On-Peak @ Sub.	MWh												
9	Energy -- Off-Peak @ Sub.	MWh												
10	Trans. Losses	MWh												
11	Energy -- All @ Source	MWh	320,427	113,049	6,124	12,007	137,942	5,303	32,240	1,493	5,547	2,494	53	4,176
12	Energy -- On-Peak @ Source	MWh												
13	Energy -- Off-Peak @ Source	MWh												
14	Demand													
15	Non-Coinc. Demand @ Cons.	kW	184,339	88,691	6,097	8,981	59,533	2,769	10,317	2,348	2,633	1,985	53	932
16	Class Non-Coinc. Demand @ Sub.	kW	63,817	25,777	1,406	2,007	24,362	1,094	5,955	384	1,150	678	19	986
18	MKEC Coinc. Demand - Avg Monthly	kW	54,883	21,225	1,086	1,956	23,226	933	4,677	241	664	368	11	496
19	MKEC Coinc. Demand - Summer	kW	74,011	36,044	974	2,384	25,769	968	5,210	376	911	1,235	10	130
20	MKEC Coinc. Demand - Winter	kW	48,507	16,412	1,116	1,816	22,379	920	4,499	198	584	84	12	487
19	Demand Charges @ Class	\$	6,648,636	2,699,160	123,213	233,097	2,725,131	108,250	549,066	30,137	80,898	56,704	1,281	41,700
20	Transmission Capacity Charges @ Class	\$	4,365,670	1,688,356	86,413	155,580	1,847,519	74,231	371,997	19,180	52,803	29,241	912	39,437
21	Class Coinc. Demand @ Sub.	kW	54,883	21,225	1,086	1,956	23,226	933	4,677	241	664	368	11	496
22														
23	Average and Excess Demand													
24	Average Demand	kW	36,578	12,905	699	1,371	15,747	605	3,680	170	633	285	6	477
25	Class Excess Demand	kW	27,239	12,871	707	637	8,615	489	2,275	213	517	393	13	509
26	Allocated Excess Demand	kW	6,612,058	3,124,471	171,499	154,523	2,091,324	118,690	552,204	51,769	125,541	95,408	3,098	123,531
27	Avg. & Excess Demand	kW	6,648,636	3,137,376	172,198	155,893	2,107,071	119,295	555,884	51,940	126,174	95,693	3,104	124,007
28	Margin													
29	Present Rate Revenue	\$	42,819,472	16,002,466	797,613	1,868,767	17,613,799	561,145	3,632,202	200,545	652,651	361,292	12,350	1,116,641
30	Proposed Rate Revenue	\$	42,819,472	16,174,693	805,788	1,889,656	17,410,495	561,145	3,632,202	202,559	652,651	361,292	12,350	1,116,641
31	Consumer													
32	No. Consumers		21,611	11,960	568	2,521	1,408	61	17	140	71	41	6	4,819
33	Pri. Line Weight. Factor			1.00	1.00	1.12	1.35	1.35	1.58	1.12	1.55	1.58	1.00	0.02
34	Weight. No. of Cons.		17,792.8	11,960.3	567.7	2,818.0	1,905.0	82.5	26.7	156.2	109.7	64.7	5.8	96.4
35	Transf. Weight. Factor			1.00	1.00	1.12	1.35	1.35	1.58	1.12	1.55	1.58	1.00	0.02
36	Weight. No. of Cons.		17,791.2	11,960.3	567.7	2,817.4	1,904.1	82.5	26.7	156.2	109.6	64.6	5.8	96.4
37	Service Weight. Factor			1.00	1.00	1.11	1.32	1.32	1.53	1.11	1.50	1.53	1.00	0.02
38	Weight. No. of Cons.		17,711.5	11,960.3	567.7	2,791.3	1,860.3	80.6	25.8	154.8	106.2	62.6	5.8	96.4
39	Meter Weight. Factor			1.00	1.00	1.08	1.27	1.27	4.23	1.29	2.56	2.56	1.00	0.02
40	Weight. No. of Cons.		17,753.3	11,960.3	567.7	2,718.0	1,789.9	77.5	71.6	180.9	180.5	104.9	5.8	96.4
41	Cons. Acct. Weight Factor			1.00	1.00	1.08	1.27	1.27	4.23	1.29	2.56	2.56	1.00	0.02
42	Weight. No. of Cons.		17,753.3	11,960.3	567.7	2,718.0	1,789.9	77.5	71.6	180.9	180.5	104.9	5.8	96.4

Development of Allocation Factors -- BUNDLED
(Continued)

Line No.	Description	Data Line No.	Name	Total	Residential Service General Use 18-RS	Residential Space Heating 18-RS	General Service Small 18-GSS	General Service Large 18-GSL	General Service Space Heating Rider No 1	Industrial Service 18-IS	Municipal Power Service 18-M-I	Water Pumping Service 18-WP	Irrigation Service 18-IP-I	Temporary Service 18-CS	Lighting
43	Allocation Factors														
44	Energy Related														
45	Energy -- All @ Sub.	7	E1	1.000000	0.352805	0.019112	0.037473	0.430495	0.016550	0.100614	0.004659	0.017311	0.007782	0.000166	0.013031
46	Energy -- On-Peak @ Sub.	8	E2												
47	Energy -- Off-Peak @ Sub.	9	E3												
48	Energy -- All @ Source	11	E4	1.000000	0.352805	0.019112	0.037473	0.430495	0.016550	0.100614	0.004659	0.017311	0.007782	0.000166	0.013031
49	Energy -- On-Peak @ Source	12	E5												
50	Energy -- Off-Peak @ Source	13	E6												
51															
52	Demand Related														
53	Non-coinc. Demand @ Cons.	15	D1	1.000000	0.481133	0.033073	0.048718	0.322956	0.015019	0.055966	0.012739	0.014283	0.010770	0.000287	0.005055
54	Non-coinc. Demand @ Class	16	D2	1.000000	0.403912	0.022025	0.031453	0.381749	0.017148	0.093316	0.006013	0.018026	0.010619	0.000295	0.015443
56	MKEC Coinc. Demand - Avg Monthly	18	D4	1.000000	0.386735	0.019794	0.035637	0.423193	0.017003	0.085210	0.004393	0.012095	0.006698	0.000209	0.009034
57	MKEC Coinc. Demand - Summer	19	D5	1.000000	0.487016	0.013156	0.032213	0.348180	0.013075	0.070393	0.005079	0.012312	0.016688	0.000131	0.001756
58	MKEC Coinc. Demand - Winter	20	D6	1.000000	0.338355	0.023017	0.037434	0.461354	0.018957	0.092754	0.004077	0.012047	0.001721	0.000244	0.010040
61	Demand Charges @ Class	19	D7	1.000000	0.405972	0.018532	0.035059	0.409878	0.016282	0.082583	0.004533	0.012168	0.008529	0.000193	0.006272
62	Transmission Capacity Charges @ Class	20	D8	1.000000	0.386735	0.019794	0.035637	0.423193	0.017003	0.085210	0.004393	0.012095	0.006698	0.000209	0.009034
63	Coinc. Demand @ Class	21	D9	1.000000	0.386735	0.019794	0.035637	0.423193	0.017003	0.085210	0.004393	0.012095	0.006698	0.000209	0.009034
64															
65															
66	Revenue Related														
67	Present Rate Revenue	29	R1	1.000000	0.373719	0.018627	0.043643	0.411350	0.013105	0.084826	0.004684	0.015242	0.008438	0.000288	0.026078
68	Proposed Rate Revenue	30	R2	1.000000	0.377742	0.018818	0.044131	0.406602	0.013105	0.084826	0.004731	0.015242	0.008438	0.000288	0.026078
69															
70	Consumer Related														
71	No. of Cons.	32	C1	1.000000	0.553429	0.026267	0.116641	0.065171	0.002823	0.000783	0.006470	0.003266	0.001897	0.000266	0.222987
72	Pri. Line Weight. Cons.	34	C2	1.000000	0.672195	0.031904	0.158378	0.107066	0.004637	0.001500	0.008781	0.006164	0.003636	0.000323	0.005417
73	Transf. Weight. Cons.	36	C3	1.000000	0.672258	0.031907	0.158362	0.107024	0.004635	0.001499	0.008781	0.006160	0.003634	0.000323	0.005417
74	Services Weight. Cons.	38	C4	1.000000	0.675281	0.032051	0.157596	0.105036	0.004549	0.001457	0.008738	0.005994	0.003532	0.000325	0.005442
75	Meter Weight. Cons.	40	C5	1.000000	0.673691	0.031975	0.153098	0.100819	0.004367	0.004031	0.010191	0.010169	0.005907	0.000324	0.005429
76	Cons. Acct. Weight. Cons.	42	C6	1.000000	0.673691	0.031975	0.153098	0.100819	0.004367	0.004031	0.010191	0.010169	0.005907	0.000324	0.005429

**Southern Pioneer Electric Company
Monthly Rate Comparison
HPS vs. LED**

Current HPS Lights - SPECo Owned

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
High Pressure Sodium	kWh Usage	kWh Usage with Line Loss	Direct Power Cost ¹	Direct O&M ²	Allocated Costs & Margin ³	Direct Capital Costs ⁴	Calculated rate ⁵	Rate Book Comparison ⁶
100 W HPS - Existing Pole	40	42	\$ 2.33	\$ 2.19	\$ 4.41	\$ 2.94	\$ 11.88	\$ 12.09
200 W HPS Cobra - Existing Pole	80	85	\$ 4.66	\$ 2.19	\$ 6.36	\$ 2.94	\$ 16.16	\$ 19.92
400 W HPS Cobra - Existing Pole	160	169	\$ 9.33	\$ 2.19	\$ 10.25	\$ 2.94	\$ 24.71	\$ 28.27

LED Lights - SPECo Owned

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
LED	kWh Usage	kWh Usage with Line Loss	Direct Power Cost ¹	Direct O&M ²	Allocated Costs & Margin ³	Direct Capital Costs ⁴	Calculated rate ⁵	Rate Book Comparison ⁶
48 W LED - Existing Pole	19	20	\$ 1.12	\$ 2.19	\$ 3.40	\$ 6.03	\$ 12.74	\$ 12.09
108 W LED - Existing Pole	43	46	\$ 2.52	\$ 2.19	\$ 4.57	\$ 9.41	\$ 18.69	\$ 19.92
215 W LED - Existing Pole	86	91	\$ 5.01	\$ 2.19	\$ 6.65	\$ 17.03	\$ 30.88	\$ 28.27

¹ Based on 2017 MKEC power costs per kWh sold.

² Per 2017 Cost of Service Study: Average O&M costs directly related to lighting.

³ Per 2017 Cost of Service Study: Allocated customer, O&M, and capital costs per light and distribution capacity costs per kWh.

⁴ Direct capital costs based on aggregated cost of HPS lights (COS) or cost of new LED light.

⁵ Column D plus Column E plus Column F plus Column G

⁶ Per 18-PAL-SL-I

**Southern Pioneer Electric Company
Monthly Rate Comparison
HPS vs. LED**

Current Flood Lights

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
High Pressure Sodium	kWh Usage	kWh Usage with Line Loss	Direct Power Cost ¹	Direct O&M ²	Allocated Costs & Margin ³	Direct Capital Costs ⁴	Calculated rate ⁵	Rate Book Comparison ⁶
150 W HPS - Existing Pole	60	63	\$ 3.50	\$ 2.19	\$ 5.39	\$ 2.94	\$ 14.02	\$ 22.28
400 W HPS - Existing Pole	160	169	\$ 9.33	\$ 2.19	\$ 10.25	\$ 2.94	\$ 24.71	\$ 42.42
1000 W MH - Existing Pole	402	425	\$ 23.43	\$ 2.19	\$ 22.04	\$ 2.94	\$ 50.60	\$ 67.56

LED Lights

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
LED	kWh Usage	kWh Usage with Line Loss	Direct Power Cost ¹	Direct O&M ²	Allocated Costs & Margin ³	Direct Capital Costs ⁴	Calculated rate ⁵	Rate Book Comparison ⁶
43 W LED - Existing Pole	16	17	\$ 0.93	\$ 2.19	\$ 3.24	\$ 8.98	\$ 15.34	\$ 22.28
140 W LED - Existing Pole	56	59	\$ 3.26	\$ 2.19	\$ 5.19	\$ 11.83	\$ 22.48	\$ 42.42
459 W LED - Existing Pole	185	195	\$ 10.76	\$ 2.19	\$ 11.45	\$ 20.09	\$ 44.49	\$ 67.56

¹ Based on 2017 MKEC power costs.

² Per 2017 Cost of Service Study: Average O&M costs directly related to lighting.

³ Per 2017 Cost of Service Study: Allocated customer, O&M, and capital costs per light and distribution capacity costs per kWh.

⁴ Direct capital costs based on aggregated cost of HPS lights (COS) or cost of new LED light.

⁵ Column D plus Column E plus Column F plus Column G

⁶ Per 18-PAL-SL-I

Southern Pioneer Electric Company
Grid Access Charge: Cost of Service and Rate Design

(a) Line	(b) Description		(c) Residential General Service (18-RS)		(d) General Service Small (18-GSS)		(e) General Service Large (18-GSL)		(f) Industrial Service (18-IS)	(g) Irrigation (18-IP-1)	(h) Notes
			Summary								
1	Grid Access Charge per kW (DC nameplate rating)										
2		Year 1	\$ 7.36	\$ 4.97	\$ 1.89	\$ 1.36	\$ 4.79			per kW (DC)	
3		Year 2	\$ 7.36	\$ 5.21	\$ 1.89	\$ 1.36	\$ 4.79			per kW (DC)	
4		Year 3	\$ 7.36	\$ 5.42	\$ 1.89	\$ 1.36	\$ 4.79			per kW (DC)	
5	Not-to-Exceed *										
6		Year 1	\$ 41.00	\$ 14.00	\$ 110.00	\$ 1,540.00	\$ 173.00			per Customer per Month	
7		Year 2	\$ 41.00	\$ 15.00	\$ 110.00	\$ 1,540.00	\$ 173.00			per Customer per Month	
8		Year 3	\$ 41.00	\$ 15.00	\$ 110.00	\$ 1,540.00	\$ 173.00			per Customer per Month	
* Equivalent to 5.6 kW DG installation for RS, 2.8 kW for GSS, 58.1 kW for GSL, 1,129.9 kW for IS, 36.1 kW for IP (DC)											
Cost of Service and Rate Design Analysis											
1. Cost of Service Study: Distribution Fixed Costs Not Recovered by Rate											
9	Annual Revenue Requirements per CCOS		\$ 17,531,674	\$ 1,928,483	#####	\$ 3,540,287	\$ 357,274			CCOS Summary, Exhibit PSE-4, Pg. 1, L2	
10	Less: Under-recovery compared to CCOS (Proposed Rates)**										
11		Year 1	\$ 1,355,885	\$ 38,699	\$ -	\$ -	\$ -			Comparison of Present and Proposed Schedules, Exhibit PSE-8, Pg. 1	
12		Year 2	\$ 1,183,658	\$ 17,810	\$ -	\$ -	\$ -			Comparison of Present and Proposed Schedules, Exhibit PSE-8, Pg. 1	
13		Year 3	\$ 1,011,430	\$ -	\$ -	\$ -	\$ -			Comparison of Present and Proposed Schedules, Exhibit PSE-8, Pg. 1	
14	Less: Annual Purchased Power Expense		\$ 8,103,150	\$ 786,314	\$ 9,133,202	\$ 1,994,457	\$ 168,910			CCOS Summary, Exhibit PSE-4, Pg. 2, L19 + L23 + L29 less SPECo Transmission O&M	
15	Equal: Annual Distribution Fixed Costs										
16		Year 1	\$ 8,072,638	\$ 1,103,470	\$ 7,018,613	\$ 1,545,830	\$ 188,364			Line 9 - Line 11 - Line 14	
17		Year 2	\$ 8,244,866	\$ 1,124,359	\$ 7,018,613	\$ 1,545,830	\$ 188,364			Line 9 - Line 12 - Line 14	
18		Year 3	\$ 8,417,094	\$ 1,142,169	\$ 7,018,613	\$ 1,545,830	\$ 188,364			Line 9 - Line 13 - Line 14	
19	Less: Annual Customer Charge Revenue										
20		Year 1	\$ 2,148,539	\$ 678,788	\$ 700,715	\$ 20,736	\$ -			Proposed Customer Charge x customers x 12 months	
21		Year 2	\$ 2,320,767	\$ 678,788	\$ 700,715	\$ 20,736	\$ -			Proposed Customer Charge x customers x 12 months	
22		Year 3	\$ 2,492,995	\$ 678,788	\$ 700,715	\$ 20,736	\$ -			Proposed Customer Charge x customers x 12 months	
23	Less: Annual Demand Charge Revenue (Distribution portion)				\$ 4,458,092	\$ 1,212,404	\$ 103,425			Capacity-related Per Unit Cost (Distribution component) x Billing Demand	
24	Equal: Distribution Fixed Costs Recovered in Energy Rate										
25		Year 1	\$ 5,924,099	\$ 424,683	\$ 1,859,805	\$ 312,690	\$ 84,938			Line 16 - Line 20 - Line 23	
26		Year 2	\$ 5,924,099	\$ 445,571	\$ 1,859,805	\$ 312,690	\$ 84,938			Line 17 - Line 21 - Line 23	
27		Year 3	\$ 5,924,099	\$ 463,381	\$ 1,859,805	\$ 312,690	\$ 84,938			Line 18 - Line 22 - Line 23	
28	Divide By: Annual Energy Sales (kWh)		106,883,802	11,352,578	#####	30,481,488	2,357,658			Revenue Requirement, Exhibit PSE-2, Pg.3	
29	Equal: Distribution Fixed Costs Recovered in Energy Rate										
30		Year 1	\$ 0.0554	\$ 0.0374	\$ 0.0143	\$ 0.0103	\$ 0.0360			Line 25 + Line 28	
31		Year 2	\$ 0.0554	\$ 0.0392	\$ 0.0143	\$ 0.0103	\$ 0.0360			Line 26 + Line 28	
32		Year 3	\$ 0.0554	\$ 0.0408	\$ 0.0143	\$ 0.0103	\$ 0.0360			Line 27 + Line 28	
33											
34	2. Conversion to per kW Rate										
35	Times: DG Capacity Factor (per DC rating)	x	18%	18%	18%	18%	18%			Per NREL PVWatts	
36	Times: Average Hours per Month	x	730	730	730	730	730			365 x 24 ÷ 12	
37	Equal: Monthly Rate per DC Nameplate Rating kW-mo.										
38		Year 1	\$ 7.36	\$ 4.97	\$ 1.89	\$ 1.36	\$ 4.79			Line 30 x Line 35 x Line 36	
39		Year 2	\$ 7.36	\$ 5.21	\$ 1.89	\$ 1.36	\$ 4.79			Line 31 x Line 35 x Line 36	
40		Year 3	\$ 7.36	\$ 5.42	\$ 1.89	\$ 1.36	\$ 4.79			Line 32 x Line 35 x Line 36	
41											
42											
43	3. Monthly Charge Cap per DG Customer										
44	Monthly Distribution Fixed Costs										
45		Year 1	\$ 672,720	\$ 91,956	\$ 584,884	\$ 128,819	\$ 15,697			Line 16 divided by 12	
46		Year 2	\$ 687,072	\$ 93,697	\$ 584,884	\$ 128,819	\$ 15,697			Line 17 divided by 12	
47		Year 3	\$ 701,424	\$ 95,181	\$ 584,884	\$ 128,819	\$ 15,697			Line 18 divided by 12	
48	Divide By: Number of Customers	÷	11,960	2,521	1,408	17	41			Revenue Requirement, Exhibit PSE-2, Pg.3	
49	Equal: Distribution Fixed Costs per Customer (or per HP) per Month										
50		Year 1	\$ 56.25	\$ 36.48	\$ 415.28	\$ 7,614.93	\$ 382.85			Line 45 + Line 48	
51		Year 2	\$ 57.45	\$ 37.17	\$ 415.28	\$ 7,614.93	\$ 382.85			Line 46 + Line 48	
52		Year 3	\$ 58.65	\$ 37.76	\$ 415.28	\$ 7,614.93	\$ 382.85			Line 47 + Line 48	
53	Less: Current Monthly Customer Charge										
54		Year 1	\$ 14.97	\$ 22.44	\$ 41.46	\$ 102.15	\$ -			Proposed Rate Schedules, Exhibit PSE-8, Pg.6-8	
55		Year 2	\$ 16.17	\$ 22.44	\$ 41.46	\$ 102.15	\$ -			Proposed Rate Schedules, Exhibit PSE-8, Pg.6-8	
56		Year 3	\$ 17.37	\$ 22.44	\$ 41.46	\$ 102.15	\$ -			Proposed Rate Schedules, Exhibit PSE-8, Pg.6-8	
57	Less: Monthly Demand Charge - Distribution Component		\$ -	\$ -	\$ 263.78	\$ 5,972.43	\$ 210.21			Line 23 + Line 48 ÷ 12	
58	Equal: Monthly Charge Cap										
59		Year 1	\$ 41.28	\$ 14.04	\$ 110.04	\$ 1,540.35	\$ 172.64			Line 50 - Line 54 - Line 57	
60		Year 2	\$ 41.28	\$ 14.73	\$ 110.04	\$ 1,540.35	\$ 172.64			Line 51 - Line 55 - Line 57	
61		Year 3	\$ 41.28	\$ 15.32	\$ 110.04	\$ 1,540.35	\$ 172.64			Line 52 - Line 56 - Line 57	
62	Equal: Monthly Charge Cap - Rounded										
63		Year 1	\$ 41.00	\$ 14.00	\$ 110.00	\$ 1,540.00	\$ 173.00			Round Line 59	
64		Year 2	\$ 41.00	\$ 15.00	\$ 110.00	\$ 1,540.00	\$ 173.00			Round Line 60	
65		Year 3	\$ 41.00	\$ 15.00	\$ 110.00	\$ 1,540.00	\$ 173.00			Round Line 61	

** Applies only in cases where under-recovery exists. For classes/in years where there is already over-recovery present, taking the difference between COS Revenue Requirement and Targeted Rate revenues into account would result in a higher than necessary GAC.

Statement of Operations
Proposed Rates
For the Test Year Ended December 31, 2017

(a) Line	(b) Description	(c) Historical	(d) (f) Pro Forma Test Year	
No.		Test Year ¹	Present Rates	Proposed Rates
1	Operating Revenue			
2	Retail Electricity Sales	\$ 67,508,951	\$ 68,808,760	\$ 68,808,760 ²
3	Wholesale Electricity Sales	\$ 1,931,977	\$ 2,142,184	\$ 2,142,184
4	Other Operating Revenue	\$ 305,461	\$ 305,461	\$ 305,461
5	Total Operating Revenue	<u>\$ 69,746,389</u>	<u>\$ 71,256,405</u>	<u>\$ 71,256,405</u>
6				
7	Operating Expenses			
8	Cost of Purchased Power	46,935,849	46,935,849	46,935,849
9	Transmission - O & M	1,293,444	1,293,444	1,293,444
10	Distribution - Operation	4,203,913	4,195,093	4,195,093
11	Distribution - Maintenance	1,705,676	1,705,676	1,705,676
12	Consumer Accounts	1,211,640	1,211,103	1,211,103
13	Consumer Service & Information	234,008	212,257	212,257
14	Sales	23,324	6,649	6,649
15	Administrative & General	2,121,868	2,086,076	2,086,076
16	Depreciation & Amortization	3,283,133	3,064,894	3,064,894
17	Taxes - Property	-	-	-
18	Taxes - Other	(1,281,817)	(51,878)	(51,878)
19	Interest on Long Term Debt	5,517,278	5,625,339	5,625,339
20	Other Interest Expense	113,020	108,337	108,337
21	Other Deductions ²	895,163	861,019	861,019
22	Total Operating Expenses	<u>\$ 66,256,499</u>	<u>\$ 67,253,857</u>	<u>\$ 67,253,857</u>
23	Net Operating Margins	<u>\$ 3,489,890</u>	<u>\$ 4,002,548</u>	<u>\$ 4,002,548</u>

¹ Reference page 1 of Exhibit PSE-2.

² Reference Schedule A for an estimate of the Pro Forma Test Year revenue under proposed rates.

Schedule A
Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates

I. Consumer and Sales Data for Pro Forma Test Year

(a) Line No.	(b) Description	(c) Avg. No. Cons. ¹	(d) Energy Sales ¹ (kWh)	(e) Billing Demand ¹ (kW)	(f) (g) (h) Rate Schedule Revenue ²		
					Year 1 (\\$)	Year 2 (\\$)	Year 3 (\\$)
1	Residential Service (19-RS)						
2	General Use	11,960	106,883,802	N.A.	16,174,693	16,346,921	16,519,148
3	Space Heating	568	5,790,181	N.A.	805,788	813,962	822,136
4	General Service Small (19-GSS)	2,521	11,352,578	N.A.	1,889,656	1,910,545	1,931,434
5	General Service Large (19-GSL)	1,408	130,420,192	390,065.4	17,410,495	17,207,190	17,003,886
6	General Service Space Heating (Rider No. 1)	61	5,013,974	10,000.2	561,145	561,145	561,145
7	Industrial Service (19-IS)	17	30,481,488	98,984.6	3,632,202	3,632,202	3,632,202
8	Industrial Service-Primary Discount	-	-	-	-	-	-
9	Real -Time Pricing (13-RTP)	1	390,457	N.A.	33,528	33,528	33,528
10	Transmission Level Service (18-STR)	6	447,734,214	652,632.6	26,258,290	26,258,290	26,258,290
11	Municipal Power Service (19-M-I)	140	1,411,591	N.A.	202,559	204,573	206,586
12	Water Pumping Service (19-WP)	71	5,244,505	N.A.	652,651	652,651	652,651
13	Irrigation Service (19-IP-I)	41	2,357,658	N.A.	361,292	361,292	361,292
14	Temporary Service (19-CS)	6	50,207	N.A.	12,350	12,350	12,350
15	Lighting	4,819	3,947,867	N.A.	1,116,641	1,116,641	1,116,641
16	Total ³	16,799	751,078,714	1,151,682.7	69,111,289	69,111,289	69,111,289
17							
18	Unbilled (prior/current mo.)				(444,182)	(444,182)	(444,182)
19	2017 ACA under-recovery as accounted for in 2018 DSC-FBR				141,653	141,653	141,653
20	Total Retail				68,808,760	68,808,760	68,808,760
21	3rd Party Wholesale				2,142,184	2,142,184	2,142,184
22					305,461	305,461	305,461
23	Grand Total				71,256,405	71,256,405	71,256,405

¹ Using historical billing units from 2017.

² Reference Schedule A, pages 3 - 7.

³ Total number of consumers excludes Lighting. Total revenues exclude revenues from wholesale LADS customers.

Schedule A
Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates
(Continued)

II. Estimate of Pro Forma Test Year Revenue Under Proposed Rates

Rate Class	Billing		Year 1		Year 2		Year 3	
	Determinants	Units	Rate	Revenue	Rate	Revenue	Rate	Revenue
Residential Service (19-RS)								
General Use								
Customer Charge	11,960	cons	\$14.97	2,148,539	\$16.17	2,320,767	\$17.37	2,492,995
Delivery Charge								
Summer (Jul-Oct)	47,033,092	kWh	\$0.13155	6,187,203	\$0.13155	6,187,203	\$0.13155	6,187,203
Winter (Nov-Jun)	59,850,710	kWh	\$0.12055	7,215,003	\$0.12055	7,215,003	\$0.12055	7,215,003
Energy Cost Adjustment	106,883,802	kWh	\$0.00185	197,503	\$0.00185	197,503	\$0.00185	197,503
Property Tax Surcharge	106,883,802	kWh		426,444		426,444		426,444
				16,174,693		16,346,921		16,519,148
Space Heating								
Customer Charge	568	cons	\$14.97	101,976	\$16.17	110,150	\$17.37	118,324
Delivery Charge								
Summer - All kWh	1,491,709	kWh	\$0.13155	196,234	\$0.13155	196,234	\$0.13155	196,234
Winter (Nov-Jun)								
Heating Block (800-5800 kWh)	1,461,515	kWh	\$0.10232	149,539	\$0.10232	149,539	\$0.10232	149,539
Other	2,836,957	kWh	\$0.12055	341,995	\$0.12055	341,995	\$0.12055	341,995
Energy Cost Adjustment	5,790,181	kWh	(\$0.00114)	(6,607)	(\$0.00114)	(6,607)	(\$0.00114)	(6,607)
Property Tax Surcharge	5,790,181	kWh		22,650		22,650		22,650
				805,788		813,962		822,136
General Service Small (19-GSS)								
Customer Charge	2,521	cons	\$22.44	678,788	\$22.44	678,788	\$22.44	678,788
Delivery Charge								
Summer (Jul-Oct)	3,987,908	kWh	\$0.10916	435,320	\$0.11100	442,658	\$0.11284	449,996
Winter (Nov-Jun)	7,364,670	kWh	\$0.09816	722,916	\$0.10000	736,467	\$0.10184	750,018
Energy Cost Adjustment	11,352,578	kWh	\$0.00066	7,500	\$0.00066	7,500	\$0.00066	7,500
Property Tax Surcharge	11,352,578	kWh		45,132		45,132		45,132
				1,889,656		1,910,545		1,931,434
General Service Large (19-GSL)								
Customer Charge	1,408	cons	\$41.46	700,715	\$41.46	700,715	\$41.46	700,715
Minimum Charge				\$698,310		\$698,310		\$698,310
Demand Charge per kW>9								
Summer (Jul-Oct)	144,146.8	kW	\$12.69	1,829,223	\$12.69	1,829,223	\$12.69	1,829,223
Winter (Nov-Jun)	245,918.6	kW	\$10.69	2,628,869	\$10.69	2,628,869	\$10.69	2,628,869
Delivery Charge	130,420,192	kWh	\$0.08369	10,915,017	\$0.08213	10,711,713	\$0.08057	10,508,408
Energy Cost Adjustment	130,420,192	kWh	\$0.00090	117,605	\$0.00090	117,605	\$0.00090	117,605
Property Tax Surcharge	130,420,192	kWh		520,755		520,755		520,755
				17,410,495		17,207,190		17,003,886
General Service Space Heating (Rider No. 1)								
Customer Charge	61	cons	\$41.46	18,408	\$41.46	18,408	\$41.46	18,408
Demand Charge								
Summer (Jul-Oct)	4,801.3	kW	\$12.69	60,928	\$12.69	60,928	\$12.69	60,928
Winter (Nov-Jun)	5,198.9	kW	\$10.69	55,576	\$10.69	55,576	\$10.69	55,576
Energy Charge								
GSL	3,146,260	kWh	\$0.08369	263,314	\$0.08369	263,314	\$0.08369	263,314
Heating	1,867,714	kWh	\$0.07530	140,631	\$0.07530	140,631	\$0.07530	140,631
Energy Cost Adjustment	5,013,974	kWh	\$0.00049	2,441	\$0.00049	2,441	\$0.00049	2,441
Property Tax Surcharge	5,013,974	kWh		19,846		19,846		19,846
				561,145		561,145		561,145

Schedule A
Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates
(Continued)

II. Estimate of Pro Forma Test Year Revenue Under Proposed Rates

Rate Class	Billing		Year 1		Year 2		Year 3	
	Determinants	Units	Rate	Revenue	Rate	Revenue	Rate	Revenue
Industrial Service (18-IS)								
Customer Charge	17	cons	\$102.15	20,736	\$102.15	20,736	\$102.15	20,736
Demand Charge per kW>10								
Summer (Jul-Oct)	35,252.1	kW	\$14.18	499,874	\$14.18	499,874	\$14.18	499,874
Winter (Nov-Jun)	63,732.5	kW	\$11.18	712,529	\$11.18	712,529	\$11.18	712,529
Delivery Charge	30,481,488	kWh	\$0.07433	2,265,689	\$0.07433	2,265,689	\$0.07433	2,265,689
Energy Cost Adjustment	30,481,488	kWh	\$0.00039	11,874	\$0.00039	11,874	\$0.00039	11,874
Property Tax Surcharge	30,481,488	kWh		121,500		121,500		121,500
Feb-Dec		/kWh	\$0.00407	3,632,202		3,632,202		3,632,202
Real -Time Pricing (13-RTP)								
Customer Charge	1	cons	\$251.55	3,019	\$251.55	3,019	\$251.55	3,019
Delivery Charge	390,457	kWh	\$0.07814	30,509	\$0.07814	30,509	\$0.07814	30,509
				33,528		33,528		33,528
Transmission Level Service (18-STR)								
Service at 34.5 kV Voltage								
Customer Charge	2	cons	\$116.52	2,796	\$116.52	2,796	\$116.52	2,796
Local Access Charge	3,733	kW	\$5.00	18,665	\$5.00	18,665	\$5.00	18,665
Delivery Energy Charge	2,374,220	kWh	\$0.001940	4,606	\$0.001940	4,606	\$0.001940	4,606
Property Tax Surcharge	2,374,220	kWh		155		155		155
Wholesale Power Cost (2017 Historical)								
Demand (WHM kW)								
Summer	935	kW	\$13.62	12,741	\$13.62	12,741	\$13.62	12,741
Other								
Jan-May, Sep	1,952	kW	\$8.47	16,536	\$8.47	16,536	\$8.47	16,536
Oct-Dec	1,178	kW	\$7.96	9,376	\$7.96	9,376	\$7.96	9,376
Energy								
Jan - Sep	1,728,303	kWh	\$0.015282	26,412	\$0.015282	26,412	\$0.015282	26,412
Oct-Dec	645,917	kWh	\$0.014358	9,274	\$0.014358	9,274	\$0.014358	9,274
Energy Cost Adjustment	2,374,220.0	kWh	\$0.022154	52,599	\$0.022154	52,599	\$0.022154	52,599
Transmission				10,921		10,921		10,921
HLF Rider				1,815		1,815		1,815
FCC Rider				330		330		330
Make Whole Payment (MWP)				44		44		44
Service at 115 kV Voltage								
Customer Charge	4	cons	\$116.52	5,593	\$116.52	5,593	\$116.52	5,593
Delivery Energy Charge	445,359,994	kW	\$0.001940	863,998	\$0.001940	863,998	\$0.001940	863,998
Property Tax Surcharge	445,359,994	kW		28,986		28,986		28,986
PF Charge				18,364		18,364		18,364
Wholesale Power Cost (2017 Historical)								
Demand								
Summer	167,235	kW	\$13.62	2,277,741	\$13.62	2,277,741	\$13.62	2,277,741
Other								
Jan-May, Sep	316,330.3	kW	\$8.47	2,679,317	\$8.47	2,679,317	\$8.47	2,679,317
Oct-Dec	165,001.8	kW	\$7.96	1,313,414	\$7.96	1,313,414	\$7.96	1,313,414
Energy								
Jan - Sep	330,616,079	kWh	\$0.015282	5,052,475	\$0.015282	5,052,475	\$0.015282	5,052,475
Oct-Dec	114,743,915	kWh	\$0.014358	1,647,493	\$0.014358	1,647,493	\$0.014358	1,647,493
Energy Cost Adjustment	445,359,994	kWh	\$0.021721	9,673,862	\$0.021721	9,673,862	\$0.021721	9,673,862
Transmission				3,279,082		3,279,082		3,279,082
HLF Rider				(862,046)		(862,046)		(862,046)
FCC Rider				22,467		22,467		22,467
Make Whole Payment (MWP)				158,673		158,673		158,673
ECIR credits				(67,400)		(67,400)		(67,400)
Total STR	447,734,214	kWh		26,258,290		26,258,290		26,258,290

Schedule A
Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates
(Continued)

II. Estimate of Pro Forma Test Year Revenue Under Proposed Rates

Rate Class	Billing		Year 1		Year 2		Year 3	
	Determinants	Units	Rate	Revenue	Rate	Revenue	Rate	Revenue
Municipal Power Service (18-M-1)								
Customer Charge	140	cons	\$14.97	25,120	\$16.17	27,133	\$17.37	29,147
Delivery Charge								
Summer (Jul-Oct)	622,653	kWh	\$0.12619	78,573	\$0.12619	78,573	\$0.12619	78,573
Winter (Nov-Jun)	788,938	kWh	\$0.11519	90,878	\$0.11519	90,878	\$0.11519	90,878
Energy Cost Adjustment	1,411,591	kWh	\$0.00166	2,346	\$0.00166	2,346	\$0.00166	2,346
Property Tax Surcharge	1,411,591	kWh		5,642		5,642		5,642
				202,559		204,573		206,586
Water Pumping Service (18-WP)								
Customer Charge	71	cons	\$20.34	17,228	\$20.34	17,228	\$20.34	17,228
Delivery Charge								
Summer (Jul-Oct)	2,139,778	kWh	\$0.12238	261,866	\$0.12238	261,866	\$0.12238	261,866
Winter (Nov-Jun)	3,104,727	kWh	\$0.11138	345,804	\$0.11138	345,804	\$0.11138	345,804
Energy Cost Adjustment	5,244,505	kWh	\$0.00129	6,792	\$0.00129	6,792	\$0.00129	6,792
Property Tax Surcharge	5,244,505	kWh		20,961		20,961		20,961
				652,651		652,651		652,651
Irrigation Service (18-IP-1)								
Demand Charge per horsepower contracted per month	2,721	/HP	\$3.17	103,425	\$3.17	103,425	\$3.17	103,425
Delivery Charge								
Summer (Jul-Oct)	1,934,258	kWh	\$0.09902	191,530	\$0.09902	191,530	\$0.09902	191,530
Winter (Nov-Jun)	423,400	kWh	\$0.08802	37,268	\$0.08802	37,268	\$0.08802	37,268
Energy Cost Adjustment	2,357,658	kWh	\$0.00826	19,466	\$0.00826	19,466	\$0.00826	19,466
Property Tax Surcharge	2,357,658	kWh		9,603		9,603		9,603
		/kWh	\$0.00407	361,292		361,292		361,292
Temporary Service (18-CS)								
Delivery Charge plus equipment service chg.	50,207	kWh	\$0.24473	12,287	\$0.24473	12,287	\$0.24473	12,287
Energy Cost Adjustment	50,207	kWh	(\$0.00255)	(128)	(\$0.00255)	(128)	(\$0.00255)	(128)
Property Tax Surcharge	50,207	kWh		191		191		191
				12,350		12,350		12,350
Private Area / Street Lighting (18-PAL-SL-1)								
Private Area Light (Coop owned)								
On Existing Pole								
100 W P.A.L. Cust 0%	892	lights	\$12.09	129,411	\$12.09	129,411	\$12.09	129,411
100 W P.A.L. Cust 100%	9	lights	\$5.35	578	\$5.35	578	\$5.35	578
150 W P.A.L. Cust 0%	29	lights	\$19.11	6,650	\$19.11	6,650	\$19.11	6,650
200 W P.A.L. Cust 0%	12	lights	\$21.87	3,149	\$21.87	3,149	\$21.87	3,149
200 W P.A.L. Cust 50%	1	lights	\$15.64	188	\$15.64	188	\$15.64	188
On New Pole (Wood)								
100 W P.A.L. Cust 0%	164	lights	\$19.33	38,041	\$19.33	38,041	\$19.33	38,041
100 W P.A.L. Cust 100%	2	lights	\$5.82	140	\$5.82	140	\$5.82	140
150 W P.A.L. Cust 0%	27	lights	\$21.97	7,118	\$21.97	7,118	\$21.97	7,118
200 W P.A.L. Cust 0%	5	lights	\$24.04	1,442	\$24.04	1,442	\$24.04	1,442
Flood Lights								
On Existing Pole								
150 W Flood Cust 0%	82	lights	\$22.28	21,924	\$22.28	21,924	\$22.28	21,924
400 W Flood Cust 0%	204	lights	\$42.42	103,844	\$42.42	103,844	\$42.42	103,844
400 W Flood Cust 50%	5	lights	\$30.14	1,808	\$30.14	1,808	\$30.14	1,808
400 W Flood Cust 100%	4	lights	\$18.45	886	\$18.45	886	\$18.45	886
1000 W Flood M.H. Cust 0%	39	lights	\$67.56	31,618	\$67.56	31,618	\$67.56	31,618
1000 W Flood M.H. Cust 100%	3	lights	\$44.27	1,594	\$44.27	1,594	\$44.27	1,594
On New Pole (Wood)								
150 W P.A.L. Cust 0%	32	lights	\$24.92	9,569	\$24.92	9,569	\$24.92	9,569
400 W P.A.L. Cust 0%	82	lights	\$44.47	43,758	\$44.47	43,758	\$44.47	43,758
400 W P.A.L. Cust 100%	3	lights	\$18.63	671	\$18.63	671	\$18.63	671
1000 W Flood M.H. Cust 0%	3	lights	\$87.41	3,147	\$87.41	3,147	\$87.41	3,147
1000 W Flood M.H. Cust 100%	1	lights	\$43.12	517	\$43.12	517	\$43.12	517

Schedule A
Summary of Consumers, Energy Sales, and
Revenue Under Present Rates
(Continued)

II. Estimate of Pro Forma Test Year Revenue Under Proposed Rates

Rate Class	Billing Determinants	Units	Year 1		Year 2		Year 3	
			Rate	Revenue	Rate	Revenue	Rate	Revenue
<u>Private Area / Street Lighting (18-PAL-SL-I)</u>								
Continued								
<u>Street Lights</u>								
On Existing Pole								
100 W P.A.L. Cust 0%	780	lights	\$13.28	124,301	\$13.28	124,301	\$13.28	124,301
100 W P.A.L. Cust 100%	1	lights	\$5.44	65	\$5.44	65	\$5.44	65
150 W P.A.L. Cust 0%	4	lights	\$16.05	770	\$16.05	770	\$16.05	770
200 W P.A.L. Cust 0%	3	lights	\$19.92	717	\$19.92	717	\$19.92	717
On New Pole (Wood)								
100 W P.A.L. Cust 0%	257	lights	\$19.33	59,614	\$19.33	59,614	\$19.33	59,614
100 W P.A.L. Cust 100%	1	lights	\$5.82	70	\$5.82	70	\$5.82	70
200 W P.A.L. Cust 0%	1	lights	\$24.04	288	\$24.04	288	\$24.04	288
On Existing Pole								
100 W Cobra Head Cust 0%	64	lights	\$13.28	10,199	\$13.28	10,199	\$13.28	10,199
150 W Cobra Head Cust 0%	43	lights	\$16.05	8,282	\$16.05	8,282	\$16.05	8,282
200 W Cobra Head Cust 0%	109	lights	\$19.92	26,055	\$19.92	26,055	\$19.92	26,055
400 W Cobra Head Cust 0%	28	lights	\$28.27	9,499	\$28.27	9,499	\$28.27	9,499
400 W Cobra Head Cust 100%	31	lights	\$17.51	6,514	\$17.51	6,514	\$17.51	6,514
On New Pole (Wood)								
100 W Cobra Head Cust 0%	119	lights	\$22.40	31,987	\$22.40	31,987	\$22.40	31,987
150 W Cobra Head Cust 0%	3	lights	\$24.63	887	\$24.63	887	\$24.63	887
200 W Cobra Head Cust 0%	12	lights	\$26.28	3,784	\$26.28	3,784	\$26.28	3,784
250 W Cobra Head Cust 0%	3	lights	\$29.56	1,064	\$29.56	1,064	\$29.56	1,064
250 W Cobra Head Cust 100%	2	lights	\$12.46	299	\$12.46	299	\$12.46	299
400 W Cobra Head Cust 0%	38	lights	\$35.60	16,234	\$35.60	16,234	\$35.60	16,234
400 W Cobra Head Cust 100%	2	lights	\$18.40	442	\$18.40	442	\$18.40	442
On New Pole (Steel)								
100 W Cobra Head Cust 0%	1	lights	\$34.26	411	\$34.26	411	\$34.26	411
150 W Cobra Head Cust 0%	18	lights	\$36.48	7,880	\$36.48	7,880	\$36.48	7,880
150 W Cobra Head Cust 100%	16	lights	\$8.81	1,692	\$8.81	1,692	\$8.81	1,692
200 W Cobra Head Cust 0%	77	lights	\$39.02	36,054	\$39.02	36,054	\$39.02	36,054
250 W Cobra Head Cust 0%	34	lights	\$43.86	17,895	\$43.86	17,895	\$43.86	17,895
400 W Cobra Head Cust 100%	13	lights	\$18.93	2,953	\$18.93	2,953	\$18.93	2,953
<u>Security (Decorative) Lighting Service (18-DOL-I)</u>								
<u>Acorn</u>								
100 W HPS Cust 50%	8	lights	\$22.07	2,119	\$22.07	2,119	\$22.07	2,119
<u>Shoebox</u>								
400 W HPS Cust 0%	3	lights	\$61.20	2,203	\$61.20	2,203	\$61.20	2,203
<u>Vapor Street Lighting Ornamental Service (18-OSL-V-I)</u>								
175 W MV	328	lights	\$15.22	59,906	\$15.22	59,906	\$15.22	59,906
250 W MV	10	lights	\$19.04	2,285	\$19.04	2,285	\$19.04	2,285
400 W MV	64	lights	\$25.97	19,945	\$25.97	19,945	\$25.97	19,945
100 W HPS	82	lights	\$13.28	13,068	\$13.28	13,068	\$13.28	13,068
150 W HPS	-	lights	\$16.05	-	\$16.05	-	\$16.05	-
200 W HPS	3	lights	\$19.92	717	\$19.92	717	\$19.92	717
<u>Controlled Private Area Lighting (18-PAL-I) Frozen</u>								
175 W MV	251	lights	\$14.04	42,288	\$14.04	42,288	\$14.04	42,288
400 W MV	27	lights	\$27.93	9,049	\$27.93	9,049	\$27.93	9,049
400 W MV (Flood)	46	lights	\$30.05	16,588	\$30.05	16,588	\$30.05	16,588
1000 W MV (Flood)	9	lights	\$59.00	6,372	\$59.00	6,372	\$59.00	6,372
100 W HPS	138	lights	\$12.09	20,021	\$12.09	20,021	\$12.09	20,021
200 W HPS	17	lights	\$21.87	4,461	\$21.87	4,461	\$21.87	4,461
150 W HPS (Flood)	60	lights	\$22.28	16,042	\$22.28	16,042	\$22.28	16,042
400 W HPS (Flood)	59	lights	\$42.42	30,033	\$42.42	30,033	\$42.42	30,033

Schedule A
Summary of Consumers, Energy Sales, and
Revenue Under Present Rates
(Continued)

II. Estimate of Pro Forma Test Year Revenue Under Proposed Rates

Rate Class	Billing		Year 1		Year 2		Year 3	
	Determinants	Units	Rate	Revenue	Rate	Revenue	Rate	Revenue
Street Lighting Service Dusk to Dawn (18-SL-I)								
MV 7000 lumen lamps	455	lights	\$14.69	80,207	\$14.69	80,207	\$14.69	80,207
				(\$)		(\$)		(\$)
Energy Cost Adjustment	3,947,867	kWh	\$0.00040	1,565	\$0.00040	1,565	\$0.00040	1,565
Property Tax Surcharge	3,947,867	kWh		15,761		15,761		15,761
Total Lighting	4,819	lights		1,116,641		1,116,641		1,116,641
Grand Total (retail)	751,078,714	kWh		<u>69,111,289</u>		<u>69,111,289</u>		<u>69,111,289</u>
Local Access Charge (18-LAC)								
Demand Charge	386,556	kW	\$5.00	1,932,778	\$5.00	1,932,778	\$5.00	1,932,778
Property Tax Surcharge	386,556	kW	0.541725	209,407	0.541725	209,407	0.541725	209,407
				2,142,184		2,142,184		2,142,184

**Comparison of Present and Proposed Rates
Annual Rate Schedule Revenue by Rate Class**

(a) Line No.	(b) Rate Class	(c)	(d)	(e)	(f)
		Rate Schedule Revenue			
		Present Rates ¹	Proposed Rates ²		
		Year 1	Year 2	Year 3	
		(\$)	(\$)	(\$)	(\$)
1	Residential Service (19-RS)				
2	General Use	16,002,466	16,174,693	16,346,921	16,519,148
3	Space Heating	797,613	805,788	813,962	822,136
4	General Service Small (19-GSS)	1,868,767	1,889,656	1,910,545	1,931,434
5	General Service Large (19-GSL)	17,613,799	17,410,495	17,207,190	17,003,886
6	General Service Space Heating (Rider No. 1)	561,145	561,145	561,145	561,145
7	Industrial Service (19-IS)	3,632,202	3,632,202	3,632,202	3,632,202
8	Industrial Service-Primary Discount	-	-	-	-
9	Real -Time Pricing (13-RTP)	33,528	33,528	33,528	33,528
10	Transmission Level Service (18-STR)	26,258,290	26,258,290	26,258,290	26,258,290
11	Municipal Power Service (19-M-I)	200,545	202,559	204,573	206,586
12	Water Pumping Service (19-WP)	652,651	652,651	652,651	652,651
13	Irrigation Service (19-IP-I)	361,292	361,292	361,292	361,292
14	Temporary Service (19-CS)	12,350	12,350	12,350	12,350
15	Lighting	1,116,641	1,116,641	1,116,641	1,116,641
16	Total Retail Rates	69,111,289	69,111,289	69,111,289	69,111,289
17					
18	Local Access Delivery Service	2,142,184	2,142,184	2,142,184	2,142,184
19					
20	Total All Rates	71,253,473	71,253,473	71,253,473	71,253,473

¹ Reference page 3 of Exhibit PSE-2.

² Reference page 2 of Exhibit RJM-7.

**Comparison of Present and Proposed Rates
Annual Change in Rate Schedule Revenue**

(a) Line No.	(b) Rate Class	(c) (d) (e) Change in Rate Schedule Revenue²		
		Year 1	Year 2	Year 3
		(\$)	(\$)	(\$)
1	Residential Service (19-RS)			
2	General Use	172,228	172,228	172,228
3	Space Heating	8,174	8,174	8,174
4	General Service Small (19-GSS)	20,889	20,889	20,889
5	General Service Large (19-GSL)	(203,304)	(203,304)	(203,304)
6	General Service Space Heating (Rider No. 1)	-	-	-
7	Industrial Service (19-IS)	-	-	-
8	Industrial Service-Primary Discount	-	-	-
9	Real -Time Pricing (13-RTP)	-	-	-
10	Transmission Level Service (18-STR)	-	-	-
11	Municipal Power Service (19-M-I)	2,014	2,014	2,014
12	Water Pumping Service (19-WP)	-	-	-
13	Irrigation Service (19-IP-I)	-	-	-
14	Temporary Service (19-CS)	-	-	-
15	Lighting	-	-	-
16	Total Retail Rates	-	-	-
17				
18	Local Access Delivery Service	-	-	-
19				
20	Total All Rates	-	-	-

**Comparison of Present and Proposed Rates
Annual Percentage Change in Rate Schedule Revenue**

(a) Line No.	(b) Rate Class	(c) (d) (e) Annual Percent Change (Cumulative)		
		Year 1	Year 2	Year 3
		(\$)	(\$)	(\$)
1	Residential Service (19-RS)			
2	General Use	1.1%	2.2%	3.2%
3	Space Heating	1.0%	2.0%	3.1%
4	General Service Small (19-GSS)	1.1%	2.2%	3.4%
5	General Service Large (19-GSL)	-1.2%	-2.3%	-3.5%
6	General Service Space Heating (Rider No. 1)	0.0%	0.0%	0.0%
7	Industrial Service (19-IS)	0.0%	0.0%	0.0%
8	Industrial Service-Primary Discount			
9	Real -Time Pricing (13-RTP)	0.0%	0.0%	0.0%
10	Transmission Level Service (18-STR)	0.0%	0.0%	0.0%
11	Municipal Power Service (19-M-I)	1.0%	2.0%	3.0%
12	Water Pumping Service (19-WP)	0.0%	0.0%	0.0%
13	Irrigation Service (19-IP-I)	0.0%	0.0%	0.0%
14	Temporary Service (19-CS)	0.0%	0.0%	0.0%
15	Lighting	0.0%	0.0%	0.0%
16	Total Retail Rates	0.0%	0.0%	0.0%
17				
18	Local Access Delivery Service	0.0%	0.0%	0.0%
19				
20	Total All Rates	0.0%	0.0%	0.0%

**Comparison of Present and Proposed Rates
Average Rate Per kWh**

(a) Line No.	(b) Rate Class	(c) Energy Sales (kWh)	(e) Average Rate				(g) Year 3 (¢/kWh)
			(d) Present (¢/kWh)	Year 1 (¢/kWh)	Year 2 (¢/kWh)	Year 3 (¢/kWh)	
1	Residential Service (19-RS)						
2	General Use	106,883,802	14.97	15.13	15.29	15.46	
3	Space Heating	5,790,181	13.78	13.92	14.06	14.20	
4	General Service Small (19-GSS)	11,352,578	16.46	16.65	16.83	17.01	
5	General Service Large (19-GSL)	130,420,192	13.51	13.35	13.19	13.04	
6	General Service Space Heating (Rider No. 1)	5,013,974	11.19	11.19	11.19	11.19	
7	Industrial Service (19-IS)	30,481,488	11.92	11.92	11.92	11.92	
8	Industrial Service-Primary Discount	-	N.A.	N.A.	N.A.	N.A.	
9	Real -Time Pricing (13-RTP)	390,457	8.59	8.59	8.59	8.59	
10	Transmission Level Service (18-STR)	447,734,214	5.86	5.86	5.86	5.86	
11	Municipal Power Service (19-M-I)	1,411,591	14.21	14.35	14.49	14.63	
12	Water Pumping Service (19-WP)	5,244,505	12.44	12.44	12.44	12.44	
13	Irrigation Service (19-IP-I)	2,357,658	15.32	15.32	15.32	15.32	
14	Temporary Service (19-CS)	50,207	24.60	24.60	24.60	24.60	
15	Lighting	3,947,867	28.28	28.28	28.28	28.28	

**Comparison of Present and Proposed - Average Monthly Bill
Average Monthly Bill Per Consumer**

(a) Line No.	(b) Rate Class	(c) Average Consumers (cons.)	(e) Average Bill Per Consumer			
			(d) Present (\$/cons./mo.)	(e) Year 1 (\$/cons./mo.)	(f) Year 2 (\$/cons./mo.)	(g) Year 3 (\$/cons./mo.)
1	Residential Service (19-RS)					
2	General Use	11,960	111.50	112.70	113.90	115.10
3	Space Heating	568	117.09	118.29	119.49	120.69
4	General Service Small (19-GSS)	2,521	61.78	62.47	63.16	63.85
5	General Service Large (19-GSL)	1,408	1,042.17	1,030.15	1,018.12	1,006.09
6	General Service Space Heating (Rider No. 1)	61	766.59	766.59	766.59	766.59
7	Industrial Service (19-IS)	17	17,892.62	17,892.62	17,892.62	17,892.62
8	Industrial Service-Primary Discount	-	N.A.	N.A.	N.A.	N.A.
9	Real -Time Pricing (13-RTP)	1	2,793.96	2,793.96	2,793.96	2,793.96
10	Transmission Level Service (18-STR)	6	364,698.47	364,698.47	364,698.47	364,698.47
11	Municipal Power Service (19-M-I)	140	119.51	120.71	121.91	123.11
12	Water Pumping Service (19-WP)	71	770.54	770.54	770.54	770.54
13	Irrigation Service (19-IP-I)	41	734.33	734.33	734.33	734.33
14	Temporary Service (19-CS)	6	178.99	178.99	178.99	178.99
15	Lighting	4,819	19.31	19.31	19.31	19.31

Present and Proposed Rate Schedules

<u>Present Rates ¹</u>			<u>Proposed Rates ¹</u>			<u>Year 1</u>	<u>Year2</u>	<u>Year 3</u>
<u>Residential Service (18-RS)</u>			<u>Residential Service (19-RS)</u>					
<u>General Use</u>			<u>General Use</u>					
Customer Charge	@	\$13.77 /mo.	Customer Charge	@	\$14.97	\$16.17	\$17.37	/mo.
Delivery Charge			Delivery Charge					
Summer (Jul-Oct)	@	\$0.13155 /kWh	Summer (Jul-Oct)	@	\$0.13155	\$0.13155	\$0.13155	/kWh
Winter (Nov-Jun)	@	\$0.12055 /kWh	Winter (Nov-Jun)	@	\$0.12055	\$0.12055	\$0.12055	/kWh
Energy Cost Adjustment	@	\$0.00185 /kWh	Energy Cost Adjustment	@	\$0.00185	\$0.00185	\$0.00185	/kWh
Property Tax Surcharge			Property Tax Surcharge	@				/kWh
Jan	@	\$0.003105 /kWh						
Feb-Dec	@	\$0.004074 /kWh						
<u>Space Heating</u>			<u>Space Heating</u>					
Customer Charge	@	\$13.77 /mo.	Customer Charge	@	\$14.97	\$16.17	\$17.37	/mo.
Delivery Charge			Delivery Charge					
Summer (Jul-Oct)	@	\$0.13155 /kWh	Summer (Jul-Oct)	@	\$0.13155	\$0.13155	\$0.13155	/kWh
Winter (Nov-Jun)			Winter (Nov-Jun)					
Heat Block (801-5800 kWh)	@	\$0.10232 /kWh	Heat Block (801-5800 kWh)	@	\$0.10232	\$0.10232	\$0.10232	/kWh
Other	@	\$0.12055 /kWh	Other	@	\$0.12055	\$0.12055	\$0.12055	/kWh
Energy Cost Adjustment	@	(\$0.00114) /kWh	Energy Cost Adjustment	@	(\$0.00114)	(\$0.00114)	(\$0.00114)	/kWh
Property Tax Surcharge			Property Tax Surcharge	@				/kWh
Jan	@	\$0.003105 /kWh						
Feb-Dec	@	\$0.004074 /kWh						
<u>General Service Small (18-GSS)</u>			<u>General Service Small (19-GSS)</u>					
Customer Charge	@	\$22.44 /mo.	Customer Charge	@	\$22.44	\$22.44	\$22.44	/mo.
Delivery Charge			Delivery Charge					
Summer (Jul-Oct)	@	\$0.10732 /kWh	Summer (Jul-Oct)	@	\$0.10916	\$0.11100	\$0.11284	/kWh
Winter (Nov-Jun)	@	\$0.09632 /kWh	Winter (Nov-Jun)	@	\$0.09816	\$0.10000	\$0.10184	/kWh
Energy Cost Adjustment	@	\$0.00066 /kWh	Energy Cost Adjustment	@	\$0.00066	\$0.00066	\$0.00066	/kWh
Property Tax Surcharge			Property Tax Surcharge	@				/kWh
Jan	@	\$0.003105 /kWh						
Feb-Dec	@	\$0.004074 /kWh						
<u>General Service Large (18-GSL)</u>			<u>General Service Large (19-GSL)</u>					
Customer Charge	@	\$41.46 /mo.	Customer Charge	@	\$41.46	\$41.46	\$41.46	/mo.
Demand Charge per kW>9			Demand Charge per kW>9					
Summer (Jul-Oct)	@	\$12.69 /kW	Summer (Jul-Oct)	@	\$12.69	\$12.69	\$12.69	/kW
Winter (Nov-Jun)	@	\$10.69 /kW	Winter (Nov-Jun)	@	\$10.69	\$10.69	\$10.69	/kW
Delivery Charge	@	\$0.08525 /kWh	Delivery Charge	@	\$0.08369	\$0.08213	\$0.08057	/kWh
Energy Cost Adjustment	@	\$0.00090 /kWh	Energy Cost Adjustment	@	\$0.00090	\$0.00090	\$0.00090	/kWh
Property Tax Surcharge			Property Tax Surcharge	@				/kWh
Jan	@	\$0.003105 /kWh						
Feb-Dec	@	\$0.004074 /kWh			\$0.00			
<u>General Service Space Heating (Rider No. 1)</u>			<u>General Service Space Heating (Rider N)</u>					
Demand Charge			Demand Charge					
Summer (Jul-Oct)	@	\$12.69 /kW	Summer (Jul-Oct)	@	\$12.69	\$12.69	\$12.69	/kW
Winter (Nov-Jun)	@	\$10.69 /kW	Winter (Nov-Jun)	@	\$10.69	\$10.69	\$10.69	/kW
Energy Charge			Energy Charge					
GSL	@	\$0.08525 /kWh	GSL	@	\$0.08369	\$0.08369	\$0.08369	/kWh
Heating	@	\$0.07267 /kWh	Heating	@	\$0.07530	\$0.07530	\$0.07530	/kWh
Energy Cost Adjustment	@	\$0.00049 /kWh	Energy Cost Adjustment	@	\$0.00049	\$0.00049	\$0.00049	/kWh
Property Tax Surcharge			Property Tax Surcharge	@				/kWh
Jan	@	0.003105 /kWh						/kWh
Feb-Dec	@	0.004074 /kWh			0.004074			/kWh
<u>Industrial Service (18-IS)</u>			<u>Industrial Service (19-IS)</u>					
Customer Charge	@	\$102.15 /mo.	Customer Charge	@	\$102.15	\$102.15	\$102.15	/mo.
Demand Charge per kW>10			Demand Charge per kW>10					
Summer (Jul-Oct)	@	\$14.18 /kW	Summer (Jul-Oct)	@	\$14.18	\$14.18	\$14.18	/kW
Winter (Nov-Jun)	@	\$11.18 /kW	Winter (Nov-Jun)	@	\$11.18	\$11.18	\$11.18	/kW
Delivery Charge			Delivery Charge					
Summer (Jul to Oct)	@	\$0.07433 /kWh	Summer - (July to Oct)	@	\$0.07433	\$0.07433	\$0.07433	/kWh
Winter (Nov-Jun)	@	\$0.07433 /kWh	Winter (Nov-Jun)	@	\$0.07433	\$0.07433	\$0.07433	/kWh
Energy Cost Adjustment	@	\$0.00039 /kWh	Energy Cost Adjustment	@	\$0.00039	\$0.00039	\$0.00039	/kWh
Property Tax Surcharge			Property Tax Surcharge	@				/kWh
Jan	@	\$0.003105 /kWh						
Feb-Dec	@	\$0.004074 /kWh						

¹ ECA and PTS are kept at historical levels to "sync" with last approved FBR Revenue Requirements. For retail PTS in 2017TY, January was still billed Dkt No. 16-SPEE-306-TAR rate. The Order in Dkt No. 17-SPEE-263-TAR was issued 1/12/17 for rates effective 2/1/17.

Present and Proposed Rate Schedules

<u>Present Rates ¹</u>			<u>Proposed Rates ¹</u>			<u>Year 1</u>	<u>Year2</u>	<u>Year 3</u>
<u>Industrial Service-Primary Discount</u>			<u>Industrial Service-Primary Discount</u>					
Customer Charge	@	\$100.11 /mo.	Customer Charge	@	\$100.11	\$100.11	\$100.11	/mo.
Demand Charge per kW>10			Demand Charge per kW>10					
Summer (Jul-Oct)	@	\$13.90 /kW	Summer (Jul-Oct)	@	\$13.90	\$13.90	\$13.90	/kW
Winter (Nov-Jun)	@	\$10.96 /kW	Winter (Nov-Jun)	@	\$10.96	\$10.96	\$10.96	/kW
Delivery Charge			Delivery Charge					
Summer (Jul-Oct)	@	\$0.07284 /kWh	Summer (Jul-Oct)	@	\$0.07284	\$0.07284	\$0.07284	/kWh
Winter (Nov-Jun)	@	\$0.07284 /kWh	Winter (Nov-Jun)	@	\$0.07284	\$0.07284	\$0.07284	/kWh
Energy Cost Adjustment	@	- /kWh	Energy Cost Adjustment	@				/kWh
Property Tax Surcharge	@	- /kWh	Property Tax Surcharge	@				/kWh
<u>Interruptible Industrial Service (18-INT)</u>			<u>Interruptible Industrial Service (19-INT)</u>					
Customer Charge	@	\$100.62 /mo.	Customer Charge	@	\$100.62	\$100.62	\$100.62	/mo.
Demand Charge per kW>10			Demand Charge per kW>10					
Non-Interruptible			Non-Interruptible					
Summer (Jul-Oct)	@	\$14.18 /kW	Summer (Jul-Oct)	@	\$14.18	\$14.18	\$14.18	/kW
Winter (Nov-Jun)	@	\$11.18 /kW	Winter (Nov-Jun)	@	\$11.18	\$11.18	\$11.18	/kW
Interruptible			Interruptible					
Summer (Jul-Oct)	@	\$7.00 /kW	Summer (Jul-Oct)	@	\$7.00	\$7.00	\$7.00	/kW
Winter (Nov-Jun)	@	\$7.00 /kW	Winter (Nov-Jun)	@	\$7.00	\$7.00	\$7.00	/kW
Penalty			Penalty					
Summer (Jul-Oct)	@	\$31.24 /kW	Summer (Jul-Oct)	@	\$31.24	\$31.24	\$31.24	/kW
Winter (Nov-Jun)	@	\$31.24 /kW	Winter (Nov-Jun)	@	\$31.24	\$31.24	\$31.24	/kW
Delivery Charge			Delivery Charge					
Summer (Jul-Oct)	@	\$0.07433 /kWh	Summer (Jul-Oct)	@	\$0.07433	\$0.07433	\$0.07433	/kWh
Winter (Nov-Jun)	@	\$0.07433 /kWh	Winter (Nov-Jun)	@	\$0.07433	\$0.07433	\$0.07433	/kWh
Energy Cost Adjustment	@	- /kWh	Energy Cost Adjustment	@				/kWh
Property Tax Surcharge	@	- /kWh	Property Tax Surcharge	@				/kWh
<u>Real -Time Pricing (13-RTP)</u>			<u>Real -Time Pricing (13-RTP)</u>					
Customer Charge	@	\$251.55 /mo.	Customer Charge	@	\$251.55	\$251.55	\$251.55	/mo.
Delivery Charge	@	\$0.07814 /kWh	Delivery Charge	@	\$0.07814	\$0.07814	\$0.07814	/kWh
<u>Transmission Level Service (18-STR)</u>			<u>Transmission Level Service (18-STR)</u>					
<u>Service at 34.5 kV Voltage</u>			<u>Service at 34.5 kV Voltage</u>					
Customer Charge	@	\$116.52 /mo.	Customer Charge	@	\$116.52	\$116.52	\$116.52	/mo.
Local Access Charge	@	\$5.00 /kW	Local Access Charge	@	\$5.00	\$5.00	\$5.00	/kW
Delivery Energy Charge	@	\$0.00194 /kWh	Delivery Energy Charge	@	\$0.00194	\$0.00194	\$0.00194	/kWh
Property Tax Surcharge			Property Tax Surcharge	@	\$0.000054	\$0.000054	\$0.000054	/kWh
Jan	@	\$0.000054 /kWh						
Feb-Dec	@	\$0.000066 /kWh						
Wholesale Power Cost			Wholesale Power Cost					
Demand	@	/kW	Demand	@				/kW
Energy	@	/kWh	Energy	@				/kWh
Energy Cost Adjustment	@	/kWh	Energy Cost Adjustment	@				/kWh
Transmission			Transmission					
HLF, FCC, MWP			HLF, FCC, MWP					
<u>Service at 115 kV Voltage</u>			<u>Service at 115 kV Voltage</u>					
Customer Charge	@	\$116.52 /mo.	Customer Charge	@	\$116.52	\$116.52	\$116.52	/mo.
Local Access Charge	@	\$5.00 /kW	Local Access Charge	@	\$5.00	\$5.00	\$5.00	/kW
Delivery Energy Charge	@	\$0.00194 /kWh	Delivery Energy Charge	@	\$0.00194	\$0.00194	\$0.00194	/kWh
Property Tax Surcharge			Property Tax Surcharge	@	\$0.000054	\$0.000054	\$0.000054	/kWh
Jan	@	\$0.000054 /kWh						
Feb-Dec	@	\$0.000066 /kWh						
Power Factor Charge								
Wholesale Power Cost			Wholesale Power Cost					
Demand	@	/kW	Demand	@				/kW
Energy	@	/kWh	Energy	@				/kWh
Energy Cost Adjustment	@	/kWh	Energy Cost Adjustment	@				/kWh
Transmission			Transmission					
HLF, FCC, MWP, ECIR			HLF, FCC, MWP, ECIR					

¹ ECA and PTS are kept at historical levels to "sync" with last approved FBR Revenue Requirements. For retail PTS in 2017TY, January was still billed Dkt No. 16-SPEE-306-TAR rate. The Order in Dkt No. 17-SPEE-263-TAR was issued 1/12/17 for rates effective 2/1/17.

Present and Proposed Rate Schedules

<u>Present Rates ¹</u>			<u>Proposed Rates ¹</u>				
<u>Municipal Power Service (18-M-I)</u>			<u>Municipal Power Service (19-M-I)</u>				
Customer Charge	@	\$13.77 /mo.	Customer Charge	@	\$14.97	\$16.17	\$17.37 /mo.
Delivery Charge			Delivery Charge				
Summer (Jul-Oct)	@	\$0.12619 /kWh	Summer (Jul-Oct)	@	\$0.12619	\$0.12619	\$0.12619 /kWh
Winter (Nov-Jun)	@	\$0.11519 /kWh	Winter (Nov-Jun)	@	\$0.11519	\$0.11519	\$0.11519 /kWh
Energy Cost Adjustment	@	\$0.00166 /kWh	Energy Cost Adjustment	@	\$0.00166	\$0.00166	\$0.00166 /kWh
Property Tax Surcharge			Property Tax Surcharge	@			/kWh
Jan	@	\$0.003105 /kWh					
Feb-Dec	@	\$0.004074 /kWh					
<u>Water Pumping Service (18-WP)</u>			<u>Water Pumping Service (19-WP)</u>				
Customer Charge	@	\$20.34 /mo.	Customer Charge	@	\$20.34	\$20.34	\$20.34 /mo.
Delivery Charge			Delivery Charge				
Summer (Jul-Oct)	@	\$0.12238 /kWh	Summer (Jul-Oct)	@	\$0.12238	\$0.12238	\$0.12238 /kWh
Winter (Nov-Jun)	@	\$0.11138 /kWh	Winter (Nov-Jun)	@	\$0.11138	\$0.11138	\$0.11138 /kWh
Energy Cost Adjustment	@	\$0.00129 /kWh	Energy Cost Adjustment	@	\$0.00129	\$0.00129	\$0.00129 /kWh
Property Tax Surcharge			Property Tax Surcharge	@			/kWh
Jan	@	\$0.003105 /kWh					
Feb-Dec	@	\$0.004074 /kWh			\$0.00		
<u>Irrigation Service (18-IP-I)</u>			<u>Irrigation Service (19-IP-I)</u>				
Demand Charge per horsepower contracted			Demand Charge per horsepower contract				
per month	@	\$3.1675 /HP	per month	@	\$3.1675	\$3.1675	\$3.1675 /HP
Delivery Charge			Delivery Charge				
Summer (Jul-Oct)	@	\$0.09902 /kWh	Summer (Jul-Oct)	@	\$0.09902	\$0.09902	\$0.09902 /kWh
Winter (Nov-Jun)	@	\$0.08802 /kWh	Winter (Nov-Jun)	@	\$0.08802	\$0.08802	\$0.08802 /kWh
Energy Cost Adjustment	@	\$0.00826 /kWh	Energy Cost Adjustment	@	\$0.00826	\$0.00826	\$0.00826 /kWh
Property Tax Surcharge			Property Tax Surcharge	@			/kWh
Jan	@	\$0.003105 /kWh					
Feb-Dec	@	\$0.004074 /kWh					
<u>Temporary Service (18-CS)</u>			<u>Temporary Service (19-CS)</u>				
Delivery Charge	@	\$0.24473 /kWh	Delivery Charge	@	\$0.24473	\$0.24473	\$0.24473 /kWh
plus equipment service chg.			plus equipment service chg.				
Energy Cost Adjustment	@	(\$0.00255) /kWh	Energy Cost Adjustment	@	(\$0.00255)	(\$0.00255)	(\$0.00255) /kWh
Property Tax Surcharge			Property Tax Surcharge	@			/kWh
Jan	@	\$0.003105 /kWh					
Feb-Dec	@	\$0.004074 /kWh					
<u>Private Area / Street Lighting (18-PAL-SL-I)</u>			<u>Private Area / Street Lighting (19-PAL-SL-I)</u>				
<u>Private Area Light (Coop owned)</u>			<u>Private Area Light (Coop owned)</u>				
On Existing Pole			On Existing Pole				
100 W P.A.L. Cust 0%	@	\$12.09 /mo.	100 W P.A.L. Cust 0%	@	\$12.09	\$12.09	\$12.09 /mo.
100 W P.A.L. Cust 100%	@	\$5.35 /mo.	100 W P.A.L. Cust 100%	@	\$5.35	\$5.35	\$5.35 /mo.
150 W P.A.L. Cust 0%	@	\$19.11 /mo.	150 W P.A.L. Cust 0%	@	\$19.11	\$19.11	\$19.11 /mo.
150 W P.A.L. Cust 100%	@	\$7.65 /mo.	150 W P.A.L. Cust 100%	@	\$7.65	\$7.65	\$7.65 /mo.
200 W P.A.L. Cust 0%	@	\$21.87 /mo.	200 W P.A.L. Cust 0%	@	\$21.87	\$21.87	\$21.87 /mo.
200 W P.A.L. Cust 50%	@	\$15.64 /mo.	200 W P.A.L. Cust 50%	@	\$15.64	\$15.64	\$15.64 /mo.
200 W P.A.L. Cust 100%	@	\$9.68 /mo.	200 W P.A.L. Cust 100%	@	\$9.68	\$9.68	\$9.68 /mo.
On New Pole (Wood)			On New Pole (Wood)				
100 W P.A.L. Cust 0%	@	\$19.33 /mo.	100 W P.A.L. Cust 0%	@	\$19.33	\$19.33	\$19.33 /mo.
100 W P.A.L. Cust 100%	@	\$5.82 /mo.	100 W P.A.L. Cust 100%	@	\$5.82	\$5.82	\$5.82 /mo.
150 W P.A.L. Cust 0%	@	\$21.97 /mo.	150 W P.A.L. Cust 0%	@	\$21.97	\$21.97	\$21.97 /mo.
150 W P.A.L. Cust 100%	@	\$7.82 /mo.	150 W P.A.L. Cust 100%	@	\$7.82	\$7.82	\$7.82 /mo.
200 W P.A.L. Cust 0%	@	\$24.04 /mo.	200 W P.A.L. Cust 0%	@	\$24.04	\$24.04	\$24.04 /mo.
200 W P.A.L. Cust 100%	@	\$9.81 /mo.	200 W P.A.L. Cust 100%	@	\$9.81	\$9.81	\$9.81 /mo.

¹ ECA and PTS are kept at historical levels to "sync" with last approved FBR Revenue Requirements. For retail PTS in 2017TY, January was still billed Dkt No. 16-SPEE-306-TAR rate. The Order in Dkt No. 17-SPEE-263-TAR was issued 1/12/17 for rates effective 2/1/17.

Present and Proposed Rate Schedules

<u>Present Rates</u>			<u>Proposed Rates</u>			
<u>Private Area / Street Lighting (18-PAL-SL-I)</u>			<u>Private Area / Street Lighting (19-PAL-</u>			
Continued			Continued			
<u>Flood Lights</u>			<u>Flood Lights</u>			
On Existing Pole			On Existing Pole			
150 W Flood Cust 0%	@	\$22.28 /mo.	150 W Flood Cust 0%	@	\$22.28	\$22.28 /mo.
150 W Flood Cust 100%	@	\$7.85 /mo.	150 W Flood Cust 100%	@	\$7.85	\$7.85 /mo.
400 W Flood Cust 0%	@	\$42.42 /mo.	400 W Flood Cust 0%	@	\$42.42	\$42.42 /mo.
400 W Flood Cust 50%	@	\$30.14 /mo.	400 W Flood Cust 50%	@	\$30.14	\$30.14 /mo.
400 W Flood Cust 100%	@	\$18.45 /mo.	400 W Flood Cust 100%	@	\$18.45	\$18.45 /mo.
1000 W Flood M.H. Cust 0%	@	\$67.56 /mo.	1000 W Flood M.H. Cust 0%	@	\$67.56	\$67.56 /mo.
1000 W Flood M.H. Cust 100%	@	\$44.27 /mo.	1000 W Flood M.H. Cust 100%	@	\$44.27	\$44.27 /mo.
On New Pole (Wood)			On New Pole (Wood)			
150 W P.A.L. Cust 0%	@	\$24.92 /mo.	150 W P.A.L. Cust 0%	@	\$24.92	\$24.92 /mo.
150 W P.A.L. Cust 100%	@	\$8.05 /mo.	150 W P.A.L. Cust 100%	@	\$8.05	\$8.05 /mo.
400 W P.A.L. Cust 0%	@	\$44.47 /mo.	400 W P.A.L. Cust 0%	@	\$44.47	\$44.47 /mo.
400 W P.A.L. Cust 100%	@	\$18.63 /mo.	400 W P.A.L. Cust 100%	@	\$18.63	\$18.63 /mo.
1000 W Flood M.H. Cust 0%	@	\$87.41 /mo.	1000 W Flood M.H. Cust 0%	@	\$87.41	\$87.41 /mo.
1000 W Flood M.H. Cust 100%	@	\$43.12 /mo.	1000 W Flood M.H. Cust 100%	@	\$43.12	\$43.12 /mo.
<u>Street Lights</u>			<u>Street Lights</u>			
On Existing Pole			On Existing Pole			
100 W P.A.L. Cust 0%	@	\$13.28 /mo.	100 W P.A.L. Cust 0%	@	\$13.28	\$13.28 /mo.
100 W P.A.L. Cust 100%	@	\$5.44 /mo.	100 W P.A.L. Cust 100%	@	\$5.44	\$5.44 /mo.
150 W P.A.L. Cust 0%	@	\$16.05 /mo.	150 W P.A.L. Cust 0%	@	\$16.05	\$16.05 /mo.
150 W P.A.L. Cust 100%	@	\$7.44 /mo.	150 W P.A.L. Cust 100%	@	\$7.44	\$7.44 /mo.
200 W P.A.L. Cust 0%	@	\$19.92 /mo.	200 W P.A.L. Cust 0%	@	\$19.92	\$19.92 /mo.
200 W P.A.L. Cust 100%	@	\$9.54 /mo.	200 W P.A.L. Cust 100%	@	\$9.54	\$9.54 /mo.
On New Pole (Wood)			On New Pole (Wood)			
100 W P.A.L. Cust 0%	@	\$19.33 /mo.	100 W P.A.L. Cust 0%	@	\$19.33	\$19.33 /mo.
100 W P.A.L. Cust 100%	@	\$5.82 /mo.	100 W P.A.L. Cust 100%	@	\$5.82	\$5.82 /mo.
150 W P.A.L. Cust 0%	@	\$21.97 /mo.	150 W P.A.L. Cust 0%	@	\$21.97	\$21.97 /mo.
150 W P.A.L. Cust 100%	@	\$7.82 /mo.	150 W P.A.L. Cust 100%	@	\$7.82	\$7.82 /mo.
200 W P.A.L. Cust 0%	@	\$24.04 /mo.	200 W P.A.L. Cust 0%	@	\$24.04	\$24.04 /mo.
200 W P.A.L. Cust 100%	@	\$9.81 /mo.	200 W P.A.L. Cust 100%	@	\$9.81	\$9.81 /mo.
On Existing Pole			On Existing Pole			
100 W Cobra Head Cust 0%	@	\$13.28 /mo.	100 W Cobra Head Cust 0%	@	\$13.28	\$13.28 /mo.
100 W Cobra Head Cust 100%	@	\$5.44 /mo.	100 W Cobra Head Cust 100%	@	\$5.44	\$5.44 /mo.
150 W Cobra Head Cust 0%	@	\$16.05 /mo.	150 W Cobra Head Cust 0%	@	\$16.05	\$16.05 /mo.
150 W Cobra Head Cust 100%	@	\$7.44 /mo.	150 W Cobra Head Cust 100%	@	\$7.44	\$7.44 /mo.
200 W Cobra Head Cust 0%	@	\$19.92 /mo.	200 W Cobra Head Cust 0%	@	\$19.92	\$19.92 /mo.
200 W Cobra Head Cust 100%	@	\$9.54 /mo.	200 W Cobra Head Cust 100%	@	\$9.54	\$9.54 /mo.
250 W Cobra Head Cust 0%	@	\$22.24 /mo.	250 W Cobra Head Cust 0%	@	\$22.24	\$22.24 /mo.
250 W Cobra Head Cust 100%	@	\$11.55 /mo.	250 W Cobra Head Cust 100%	@	\$11.55	\$11.55 /mo.
400 W Cobra Head Cust 0%	@	\$28.27 /mo.	400 W Cobra Head Cust 0%	@	\$28.27	\$28.27 /mo.
400 W Cobra Head Cust 100%	@	\$17.51 /mo.	400 W Cobra Head Cust 100%	@	\$17.51	\$17.51 /mo.
On New Pole (Wood)			On New Pole (Wood)			
100 W Cobra Head Cust 0%	@	\$22.40 /mo.	100 W Cobra Head Cust 0%	@	\$22.40	\$22.40 /mo.
100 W Cobra Head Cust 100%	@	\$6.02 /mo.	100 W Cobra Head Cust 100%	@	\$6.02	\$6.02 /mo.
150 W Cobra Head Cust 0%	@	\$24.63 /mo.	150 W Cobra Head Cust 0%	@	\$24.63	\$24.63 /mo.
150 W Cobra Head Cust 100%	@	\$8.03 /mo.	150 W Cobra Head Cust 100%	@	\$8.03	\$8.03 /mo.
200 W Cobra Head Cust 0%	@	\$26.28 /mo.	200 W Cobra Head Cust 0%	@	\$26.28	\$26.28 /mo.
200 W Cobra Head Cust 100%	@	\$9.97 /mo.	200 W Cobra Head Cust 100%	@	\$9.97	\$9.97 /mo.
250 W Cobra Head Cust 0%	@	\$29.56 /mo.	250 W Cobra Head Cust 0%	@	\$29.56	\$29.56 /mo.
250 W Cobra Head Cust 100%	@	\$12.46 /mo.	250 W Cobra Head Cust 100%	@	\$12.46	\$12.46 /mo.
400 W Cobra Head Cust 0%	@	\$35.60 /mo.	400 W Cobra Head Cust 0%	@	\$35.60	\$35.60 /mo.
400 W Cobra Head Cust 100%	@	\$18.40 /mo.	400 W Cobra Head Cust 100%	@	\$18.40	\$18.40 /mo.
On New Pole (Steel)			On New Pole (Steel)			
100 W Cobra Head Cust 0%	@	\$34.26 /mo.	100 W Cobra Head Cust 0%	@	\$34.26	\$34.26 /mo.
100 W Cobra Head Cust 100%	@	\$6.83 /mo.	100 W Cobra Head Cust 100%	@	\$6.83	\$6.83 /mo.
150 W Cobra Head Cust 0%	@	\$36.48 /mo.	150 W Cobra Head Cust 0%	@	\$36.48	\$36.48 /mo.
150 W Cobra Head Cust 100%	@	\$8.81 /mo.	150 W Cobra Head Cust 100%	@	\$8.81	\$8.81 /mo.
200 W Cobra Head Cust 0%	@	\$39.02 /mo.	200 W Cobra Head Cust 0%	@	\$39.02	\$39.02 /mo.
200 W Cobra Head Cust 100%	@	\$10.81 /mo.	200 W Cobra Head Cust 100%	@	\$10.81	\$10.81 /mo.
250 W Cobra Head Cust 0%	@	\$43.86 /mo.	250 W Cobra Head Cust 0%	@	\$43.86	\$43.86 /mo.
250 W Cobra Head Cust 100%	@	\$12.99 /mo.	250 W Cobra Head Cust 100%	@	\$12.99	\$12.99 /mo.
400 W Cobra Head Cust 0%	@	\$49.85 /mo.	400 W Cobra Head Cust 0%	@	\$49.85	\$49.85 /mo.
400 W Cobra Head Cust 100%	@	\$18.93 /mo.	400 W Cobra Head Cust 100%	@	\$18.93	\$18.93 /mo.

Present and Proposed Rate Schedules

Present Rates
Security (Decorative) Lighting Service (18-DOL-I)

Acorn

35 W HPS	Cust 0%	@	\$25.27 /mo.
35 W HPS	Cust 100%	@	\$4.03 /mo.
100 W HPS	Cust 0%	@	\$37.52 /mo.
100 W HPS	Cust 50%	@	\$22.07 /mo.
100 W HPS	Cust 100%	@	\$7.32 /mo.
250 W HPS	Cust 0%	@	\$45.35 /mo.
250 W HPS	Cust 100%	@	\$13.42 /mo.

Single Globe

35 W HPS	Cust 0%	@	\$19.61 /mo.
35 W HPS	Cust 100%	@	\$3.64 /mo.
70 W HPS	Cust 0%	@	\$32.43 /mo.
70 W HPS	Cust 100%	@	\$5.83 /mo.
100 W HPS	Cust 0%	@	\$33.93 /mo.
100 W HPS	Cust 100%	@	\$7.09 /mo.
150 W HPS	Cust 0%	@	\$36.15 /mo.
150 W HPS	Cust 100%	@	\$9.09 /mo.

Multi Globe

70 W HPS	Cust 0%	@	\$87.78 /mo.
70 W HPS	Cust 100%	@	\$20.97 /mo.
100 W HPS	Cust 0%	@	\$95.11 /mo.
100 W HPS	Cust 100%	@	\$27.07 /mo.
150 W HPS	Cust 0%	@	\$106.36 /mo.
150 W HPS	Cust 100%	@	\$37.07 /mo.

Lantern

35 W HPS	Cust 0%	@	\$22.83 /mo.
35 W HPS	Cust 100%	@	\$3.88 /mo.
100 W HPS	Cust 0%	@	\$40.42 /mo.
100 W HPS	Cust 100%	@	\$7.50 /mo.
250 W HPS	Cust 0%	@	\$47.94 /mo.
250 W HPS	Cust 100%	@	\$13.58 /mo.

Security (Decorative) Lighting Service (18-DOL-I)
Continued

Shoebox

100 W HPS	Cust 0%	@	\$47.02 /mo.
100 W HPS	Cust 100%	@	\$7.94 /mo.
250 W HPS	Cust 0%	@	\$54.39 /mo.
250 W HPS	Cust 100%	@	\$14.02 /mo.
400 W HPS	Cust 0%	@	\$61.20 /mo.
400 W HPS	Cust 100%	@	\$20.30 /mo.
800 W HPS	Cust 0%	@	\$87.66 /mo.
800 W HPS	Cust 100%	@	\$37.37 /mo.

Vapor Street Lighting Ornamental Ser

175 W MV		@	\$15.22 /mo.
250 W MV		@	\$19.04 /mo.
400 W MV		@	\$25.97 /mo.
100 W HPS		@	\$13.28 /mo.
150 W HPS		@	\$16.05 /mo.
200 W HPS		@	\$19.92 /mo.

Controlled Private Area Lighting (18-PAL-I) Frozen

175 W MV		@	\$14.04 /mo.
400 W MV		@	\$27.93 /mo.
400 W MV (Flood)		@	\$30.05 /mo.
1000 W MV (Flood)		@	\$59.00 /mo.
100 W HPS		@	\$12.09 /mo.
200 W HPS		@	\$21.87 /mo.
150 W HPS (Flood)		@	\$22.28 /mo.
400 W HPS (Flood)		@	\$42.42 /mo.

Proposed Rates
Security (Decorative) Lighting Service (

Acorn

35 W HPS	Cust 0%	@	\$25.27	\$25.27	\$25.27 /mo.
35 W HPS	Cust 100%	@	\$4.03	\$4.03	\$4.03 /mo.
100 W HPS	Cust 0%	@	\$37.52	\$37.52	\$37.52 /mo.
100 W HPS	Cust 50%	@	\$22.07	\$22.07	\$22.07 /mo.
100 W HPS	Cust 100%	@	\$7.32	\$7.32	\$7.32 /mo.
250 W HPS	Cust 0%	@	\$45.35	\$45.35	\$45.35 /mo.
250 W HPS	Cust 100%	@	\$13.42	\$13.42	\$13.42 /mo.

Single Globe

35 W HPS	Cust 0%	@	\$19.61	\$19.61	\$19.61 /mo.
35 W HPS	Cust 100%	@	\$3.64	\$3.64	\$3.64 /mo.
70 W HPS	Cust 0%	@	\$32.43	\$32.43	\$32.43 /mo.
70 W HPS	Cust 100%	@	\$5.83	\$5.83	\$5.83 /mo.
100 W HPS	Cust 0%	@	\$33.93	\$33.93	\$33.93 /mo.
100 W HPS	Cust 100%	@	\$7.09	\$7.09	\$7.09 /mo.
150 W HPS	Cust 0%	@	\$36.15	\$36.15	\$36.15 /mo.
150 W HPS	Cust 100%	@	\$9.09	\$9.09	\$9.09 /mo.

Multi Globe

70 W HPS	Cust 0%	@	\$87.78	\$87.78	\$87.78 /mo.
70 W HPS	Cust 100%	@	\$20.97	\$20.97	\$20.97 /mo.
100 W HPS	Cust 0%	@	\$95.11	\$95.11	\$95.11 /mo.
100 W HPS	Cust 100%	@	\$27.07	\$27.07	\$27.07 /mo.
150 W HPS	Cust 0%	@	\$106.36	\$106.36	\$106.36 /mo.
150 W HPS	Cust 100%	@	\$37.07	\$37.07	\$37.07 /mo.

Lantern

35 W HPS	Cust 0%	@	\$22.83	\$22.83	\$22.83 /mo.
35 W HPS	Cust 100%	@	\$3.88	\$3.88	\$3.88 /mo.
100 W HPS	Cust 0%	@	\$40.42	\$40.42	\$40.42 /mo.
100 W HPS	Cust 100%	@	\$7.50	\$7.50	\$7.50 /mo.
250 W HPS	Cust 0%	@	\$47.94	\$47.94	\$47.94 /mo.
250 W HPS	Cust 100%	@	\$13.58	\$13.58	\$13.58 /mo.

Security (Decorative) Lighting Service (
Continued

Shoebox

100 W HPS	Cust 0%	@	\$47.02	\$47.02	\$47.02 /mo.
100 W HPS	Cust 100%	@	\$7.94	\$7.94	\$7.94 /mo.
250 W HPS	Cust 0%	@	\$54.39	\$54.39	\$54.39 /mo.
250 W HPS	Cust 100%	@	\$14.02	\$14.02	\$14.02 /mo.
400 W HPS	Cust 0%	@	\$61.20	\$61.20	\$61.20 /mo.
400 W HPS	Cust 100%	@	\$20.30	\$20.30	\$20.30 /mo.
800 W HPS	Cust 0%	@	\$87.66	\$87.66	\$87.66 /mo.
800 W HPS	Cust 100%	@	\$37.37	\$37.37	\$37.37 /mo.

Vapor Street Lighting Ornamental Serv

175 W MV		@	\$15.22	\$15.22	\$15.22 /mo.
250 W MV		@	\$19.04	\$19.04	\$19.04 /mo.
400 W MV		@	\$25.97	\$25.97	\$25.97 /mo.
100 W HPS		@	\$13.28	\$13.28	\$13.28 /mo.
150 W HPS		@	\$16.05	\$16.05	\$16.05 /mo.
200 W HPS		@	\$19.92	\$19.92	\$19.92 /mo.

Controlled Private Area Lighting (19-P/

175 W MV		@	\$14.04	\$14.04	\$14.04 /mo.
400 W MV		@	\$27.93	\$27.93	\$27.93 /mo.
400 W MV (Flood)		@	\$30.05	\$30.05	\$30.05 /mo.
1000 W MV (Flood)		@	\$59.00	\$59.00	\$59.00 /mo.
100 W HPS		@	\$12.09	\$12.09	\$12.09 /mo.
200 W HPS		@	\$21.87	\$21.87	\$21.87 /mo.
150 W HPS (Flood)		@	\$22.28	\$22.28	\$22.28 /mo.
400 W HPS (Flood)		@	\$42.42	\$42.42	\$42.42 /mo.

Present and Proposed Rate Schedules

<u>Present Rates</u>				<u>Proposed Rates</u>			
<u>Street Lighting Service Dusk to Dawn (18-SL-1)</u>				<u>Street Lighting Service Dusk to Dawn (1</u>			
Inc 1000 lumen lamps	@	\$6.41	/mo.	Inc 1000 lumen lamps	@	\$6.41	\$6.41 /mo.
MV 7000 lumen lamps	@	\$14.69	/mo.	MV 7000 lumen lamps	@	\$14.69	\$14.69 /mo.
Energy Cost Adjustment - Lighting	@	\$0.000396	/kWh	Energy Cost Adjustment - Lighting	@	\$0.000396	\$0.000396 /kWh
Property Tax Surcharge - Lighting				Property Tax Surcharge - Lighting	@		/kWh
Jan	@	\$0.003105	/kWh				
Feb-Dec	@	\$0.004074	/kWh				
<u>Local Access Charge (18-LAC)</u>				<u>Local Access Charge (18-LAC)</u>			
Demand Charge	@	\$5.00	/kW	Demand Charge	@	\$5.00	\$5.00 /kW
Property Tax Surcharge	@	\$0.54173	/kW	Property Tax Surcharge	@	\$0.54173	\$0.54173 /kW

VERIFICATION OF RICHARD J. MACKE

STATE OF MINNESOTA)
) ss
COUNTY OF ANOKA)

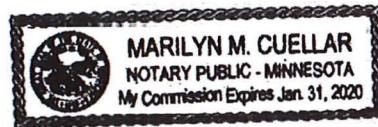
The undersigned, Richard J. Macke, upon oath first duly sworn, states that he is an employee of Power System Engineering, Inc., and that the foregoing testimony was prepared by him or under his supervision, that he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.

Richard J. Macke
Richard J. Macke

Subscribed and sworn to before me this th 30 day of September, 2019.

Marilyn M. Cuellar
Notary Public

My appointment expires: 1/31/20



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing testimony was electronically served this 10th day of October, 2019 to:

CARLY MASENTHIN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
c.masenthin@kcc.ks.gov

ROBERT VINCENT, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
r.vincent@kcc.ks.gov

JOSEPH R. ASTRAB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604
j.astrab@curb.kansas.gov

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
t.love@curb.kansas.gov

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
D.NICKEL@CURB.KANSAS.GOV

RANDALL D. MAGNISON
EXECUTIVE VICE PRESIDENT – ASST CEO
SOUTHERN PIONEER ELECTRIC COMPANY
PO BOX 430
ULYSSES, KANSAS 67880
RMAGNISON@PIONEERELECTRIC.COOP

STEPHEN J. EPPERSON, CEO
SOUTHERN PIONEER ELECTRIC
COMPANY
1850 W OKLAHOMA
PO BOX 403
ULYSSES, KANSAS 67880-0430
SEPPERSON@PIONEERELECTRIC.COOP

LINDSAY CAMPBELL, EXECUTIVE VP -
GENERAL COUNSEL
SOUTHERN PIONEER ELECTRIC COMPANY
1850 W OKLAHOMA
PO BOX 368
ULYSSES, KS 67880-0368
LCAMPBELL@PIONEERELECTRIC.COOP

CHANTRY SCOTT
CFO – V.P. - FINANCE & ACCOUNTING
SOUTHERN PIONEER ELECTRIC COMPANY
P.O. BOX 430
ULYSSES, KS 67880-0430
CSCOTT@PIONEERELECTRIC.COOP

RICH MACKE
VP-ECONOMICS,RATES, BUSINESS PLANNING
POWER SYSTEM ENGINEERING, INC.
10710 TOWN SQUARE DRIVE NE, SUITE 201
MINNEAPOLIS, MINNESOTA 55449
RMACKE@POWERSYSTEM.ORG

ELENA LARSON
MANAGER-RATES,REGULATORY SERVICES
POWER SYSTEM ENGINEERING, INC.
3321 SW 6TH AVENUE
TOPEKA, KANSAS 66606
LARSONE@POWERSYSTEM.ORG

Glenda Cafer

Glenda Cafer