

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

In the Matter of a Joint Application of Mid-Kansas)
Electric Company, LLC, Prairie Land Electric)
Cooperative, Inc., Southern Pioneer Electric) Docket No. 16-MKEE - _____ -
Company, The Victory Electric Cooperative)
Association, Inc., and Western Cooperative)
Electric Association, Inc., for Approval of)
Individual 34.5kV Formula-Based Rates.)

PREFILED DIRECT TESTIMONY OF

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

ON BEHALF OF

**MID-KANSAS ELECTRIC COMPANY, LLC,
PRAIRIE LAND ELECTRIC COOPERATIVE, INC.,
SOUTHERN PIONEER ELECTRIC COMPANY,
THE VICTORY ELECTRIC COOPERATIVE ASSOCIATION, INC., AND
WESTERN COOPERATIVE ELECTRIC ASSOCIATION, INC.**

July 15, 2015

TABLE OF CONTENTS

PART I - QUALIFICATIONS	1
PART II - SUMMARY OF DIRECT TESTIMONY	4
PART III - OVERVIEW OF THE 34.5KV FBR.....	7
PART IV – 34.5KV RATE REGULATION.....	9
PART V – 34.5KV FBR COMPONENTS	18
A. TEMPLATE AND PROTOCOLS	18
B. RATE DESIGN	28

TABLES

Table 1 - Summary of Annual Operating Margins	24
Table 2 - Summary of Operating Tier (2009-2013 Median Values) <i>Source:</i> <i>CFC Key Ratio Trend Analysis</i>	26
Table 3 - Summary of Modified DSC (2009-2013 Median Values) <i>Source:</i> <i>CFC Key Ratio Trend Analysis</i>	26
Table 4 - Summary of Equity Position <i>As of 12/31/13</i>	28

EXHIBITS

Exhibit 1-1	-	Prairie Land 34.5kV FBR Template – Blank
Exhibit 1-2	-	Victory 34.5kV FBR Template – Blank
Exhibit 1-3	-	Western 34.5kV FBR Template – Blank
Exhibit 1-4	-	Southern Pioneer 34.5kV FBR Template – Blank
Exhibit 2-1	-	Prairie Land 34.5kV FBR Template – Populated
Exhibit 2-2	-	Victory 34.5kV FBR Template – Populated
Exhibit 2-3	-	Western 34.5kV FBR Template – Populated
Exhibit 2-4	-	Southern Pioneer 34.5kV FBR Template – Populated
Exhibit 3-1	-	Prairie Land 34.5kV FBR Protocols
Exhibit 3-2	-	Victory 34.5kV FBR Protocols
Exhibit 3-3	-	Western 34.5kV FBR Protocols
Exhibit 3-4	-	Southern Pioneer 34.5kV FBR Protocols
Exhibit 4	-	CFC Key Ratio Trend Analysis for 2013

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; 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.

Q. Please describe your responsibilities with PSE.

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

- Cost of Service Studies.
- Capital Credit Allocations.
- Demand Response.
- Distributed Generation Rates.
- Energy Efficiency.
- Financial Forecasting.
- Individual Customer Profitability.
- Large Power Contract Rates/Proposals.
- Line Extension Policies/Charges.
- Load Management Analysis.
- Load Forecasting.
- Market and Load Research.
- Merger Analysis.
- Pole Attachment Charges.
- Policy and Board Audits.
- Power Cost Adjustments.
- Rate Consolidation.
- Retail Rate Design and Analysis.
- Special Fees and Charges.
- Statistical Performance Measurement (Benchmarking).
- Value of Service.

Q. What is your educational background?

A. I graduated from Bethel University in St. Paul, Minnesota in 1996 with a Bachelor of Arts degree in Business. In 2007, I received my Masters of Business Administration degree from the University of Minnesota in Minneapolis, Minnesota. I have also attended numerous industry seminars/courses on COS, pricing, valuation, distributed generation, etc.

Q. What is your professional background?

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

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

1 I rejoined PSE in 1999; and from 1999 to 2002, I held the position of Rate and Financial
2 Analyst in the Rates and Financial Planning Department. From 2002 to March 2008, I held
3 the position of Senior Rate and Financial Analyst in the Utility Planning and Rate Division.
4 From April 2008 to June 2010, I held the position of Leader, Rates and Financial Planning.
5 In July 2010, my title changed to Vice President, Rates and Financial Planning. Since June
6 2011, I have held the position of Vice President, Economics, Rates, and Business Planning.
7 In this capacity, I continue to provide, amongst other things: 1) rate, financial, and economic
8 consulting services to clients, 2) management and leadership to the Economics, Rates, and
9 Business Planning Department and 3) management and leadership at the corporate level to
10 PSE through participation on the Executive Committee and Board of Directors.

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

13 A. Yes. I submitted testimony on behalf of: Pioneer Electric Cooperative, Inc. in Docket No.
14 09-PNRE-563-RTS; Wheatland Electric Cooperative, Inc. in Docket No. 09-WHLE-681-
15 RTS; Mid-Kansas Electric Company, LLC (“Mid-Kansas”) in Docket Nos. 09-MKEE-969-
16 RTS (“09-969 Docket”), 11-MKEE-439-RTS (“11-439 Docket”), 12-MKEE-491-RTS (“12-
17 491 Docket”), 12-MKEE-380-RTS (“12-380 Docket”), and 13-MKEE-452-MIS (“13-452
18 Docket”); and Southern Pioneer Electric Company in Docket Nos. 14-SPEE-507-RTS (“14-
19 507 Docket”) and 15-SPEE-161-RTS (“15-161 Docket”).

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

21 A. Yes. I have directed well over 100 rate and COS studies and numerous other rate, economic
22 and financial related projects. Many times these projects were conducted for self-regulated
23 electric utilities. I have also performed such analysis which was filed in regulated rate cases
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1 on behalf of cooperatives in Iowa, Kansas, Michigan, Minnesota, New Hampshire, South
2 Carolina, and Texas.

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

7 **PART II - SUMMARY OF DIRECT TESTIMONY**

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

9 A. The purpose of my testimony is to support the Joint Application of Mid-Kansas Electric
10 Company, LLC. ("Mid-Kansas"), and four of its member-owners, Prairie Land Electric
11 Cooperative, Inc. ("Prairie Land"), Southern Pioneer Electric Company ("Southern
12 Pioneer"), The Victory Electric Cooperative Association, Inc. ("Victory"), and Western
13 Cooperative Electric Association, Inc. ("Western") (individually a "Member" and
14 collectively the "Members") (collectively Mid-Kansas and the Members, the "Joint
15 Applicants"), for Commission Approval of an individual 34.5kV Formula-Based Rate
16 ("34.5kV FBR") for each Member.

17 Each 34.5kV FBR would be used to determine the revenue requirement of each
18 corresponding Member for purposes of annually updating the rates for service over their
19 respective 34.5kV facilities.

20 **Q. What are the 34.5kV facilities?**

21 A. The 34.5kV sub-transmission facilities are owned, operated, and maintained individually by
22 each of the Members. The Members utilize their respective 34.5kV facilities to deliver
23 electricity to retail customers within their certificated service territory (both directly at the
24
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1 34.5kV and/or through distribution substations that transform the 34.5kV voltage to lower
2 distribution voltages), as well as to wholesale customers receiving local access delivery
3 service (“LADS”).¹ Both retail and wholesale LADS customers of each Member help pay for
4 their respective 34.5kV system: the retail load’s share of the total 34.5kV system costs is
5 embedded in each Member’s bundled retail base rates; while the wholesale LADS customers
6 are assessed a Local Access Charge (“LAC”), a monthly \$/kW demand rate specified in each
7 Member’s LADS tariff schedules.²

8 **Q. Will the requested 34.5kV FBR affect both the retail rates and the wholesale LADS**
9 **customers’ LAC for each Member?**

10 A. No. As detailed in the Joint Application in the instant docket, Southern Pioneer is the only
11 Member that remains fully KCC-jurisdictional. Accordingly, the 34.5kV FBR will affect
12 Southern Pioneer’s retail rates, as well as its LAC. However, for the remaining Members,
13 who were qualified and chose to self-regulate from the Commission’s jurisdiction pursuant to
14 K.S.A. 66-104d, only their respective LAC rates will be directly affected by their 34.5kV
15 FBR.³ It is possible that these three deregulated cooperatives will use the results of their
16 34.5kV FBR to update their respective retail rates synchronously with the LAC rate update;
17 however, a decision to do so will be at the discretion of their local member-elected Boards of
18 Trustees and not subject to the actions of the Commission. Nevertheless, this should not be
19

20 ¹ In prior Commission filings, Members’ wholesale customers receiving LADS over Member-owned 34.5kV sub-
transmission facilities were sometimes referred to as “third-party” or “local access customers.”

21 ² Historically, due to the fact they reference the LAC rate, LADS tariffs have been indexed as “LAC” schedules
22 per Members’ tariff sheets nomenclature. Hence, LADS tariffs have also been referred to as “LAC tariffs” in
the past.

23 ³ K.S.A. 66-104d releases the deregulated cooperative from the Commission jurisdiction over the cooperative’s
24 retail rates; however, under subsection (f) of this statute, certain operations and transactions of deregulated
electric cooperatives continue to be regulated by the Commission, including “charges, fees or tariffs for
transmission services.” The LADS tariff specifying the LAC rate for the Member’s wholesale customer(s)
utilizing its 34.5kV system is an example of the latter and, therefore, remains subject to Commission regulation.

1 interpreted as the potential for the inequality in the treatment of these cooperatives’
2 wholesale LADS customers vs. retail customers: the 34.5kV FBR calculates the resultant
3 LAC rate using the full revenue requirement associated with the Member’s 34.5kV facilities
4 and the total (i.e., wholesale and retail) billing demand on the 34.5kV system, thus ensuring
5 the wholesale LADS customers will pay only their equitable share.

6 **Q. At this time, are the Joint Applicant Members requesting an actual rate change to**
7 **either the retail rates or the LAC in this Application?**

8 A. No. The request being submitted to the Commission in the instant Joint Application is not
9 for an actual rate change; i.e., neither the current retail rates, nor the LAC will require an
10 actual update as part of this Joint Application.

11 **Q. Then what is being requested?**

12 A. The request is merely for the approval of the 34.5kV FBR mechanism as reflected in the
13 formula templates and Protocols (included as exhibits to my testimony), which will be used
14 in the future determination of the corresponding rates for each of the Members.⁴ It should
15 also be noted any such potential future rate change resulting from the annual update of the
16 34.5kV FBR for each Member would remain subject to the review and approval of the
17 Commission. It is expected that the first annual update filing by each Member utilizing the
18 34.5kV FBR (i.e. “Annual Update”) would occur in 2016.

19 **Q. What is the Joint Applicants’ objective in requesting this 34.5kV FBR mechanism?**

20 A. As mentioned previously, the LAC rates that the Members charge for service provided to the
21 wholesale LADS customers over their respective Member-owned 34.5kV sub-transmission
22

23 ⁴ As evident from these formula templates and as explained further in my testimony, although there are some
24 minor difference between the Members’ individual 34.5kV FBRs, overall, they all share the same general
25 approach, i.e., use a common formula-based rate-setting mechanism.

1 facilities remain under the Commission jurisdiction regardless of their deregulation status
2 under K.S.A. 66-104d. Therefore, each Member is still required to continue to formally file
3 with the Commission a request for adjustments to its LAC rate as needed. Accordingly, the
4 Joint Applicants believe there is a need to implement a regulatory approach for each of the
5 Members that will allow for a time-efficient and cost-effective application review process
6 while assuring reasonable rates are reflective of the cost of providing service over the 34.5kV
7 facilities. The requested 34.5kV FBR mechanism provides the framework for achieving this
8 objective, which the Joint Applicants believe to be in the best interest of their customers.

9 **Q. Are you sponsoring any exhibits?**

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

11 Exhibit 1-1 - Prairie Land 34.5kV FBR Template – Blank
12 Exhibit 1-2 - Victory 34.5kV FBR Template – Blank
13 Exhibit 1-3 - Western 34.5kV FBR Template – Blank
14 Exhibit 1-4 - Southern Pioneer 34.5kV FBR Template – Blank
15 Exhibit 2-1 - Prairie Land 34.5kV FBR Template – Populated
16 Exhibit 2-2 - Victory 34.5kV FBR Template – Populated
17 Exhibit 2-3 - Western 34.5kV FBR Template – Populated
18 Exhibit 2-4 - Southern Pioneer 34.5kV FBR Template – Populated
19 Exhibit 3-1 - Prairie Land 34.5kV FBR Protocols
20 Exhibit 3-2 - Victory 34.5kV FBR Protocols
21 Exhibit 3-3 - Western 34.5kV FBR Protocols
22 Exhibit 3-4 - Southern Pioneer 34.5kV FBR Protocols
23 Exhibit 4 - CFC Key Ratio Trend Analysis for 2013

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

19 A. Yes.

20 **PART III – 34.5 KV FBR MECHANISM OVERVIEW**

21 **Q. Please summarize the 34.5kV FBR mechanism being requested.**

22 A. The requested 34.5kV FBR mechanism is a formulaic approach used for establishing rates
23 for service over the Members' respective 34.5kV sub-transmission facilities on an annual
24 basis. The general steps, common to all four of the Members' 34.5kV FBRs, are as follows:
25

1 first, the Member's revenue requirement associated with the costs of owning, operating, and
2 maintaining the 34.5kV facilities is determined; next, the revenue requirement is divided by
3 the 34.5kV total billing units to produce a system-wide (meaning common for wholesale and
4 retail) per unit LAC rate.⁵ Additionally, for Southern Pioneer, whose retail rates remain
5 subject to Commission jurisdiction, the 34.5kV FBR will also determine the retail portion of
6 the overall 34.5kV revenue requirement (by multiplying the resultant LAC rate by the retail
7 34.5kV billing units) and the corresponding retail rate adjustment.⁶ Each year, the Members
8 will perform the prescribed calculations within their individual 34.5kV FBR and separately
9 file their Annual Updates with the Commission.⁷ However, to facilitate efficiency and ease of
10 review for Commission Staff ("Staff") and Interveners, the Protocols accompanying each
11 Member's 34.5kV FBR do share a common time frame for filing these Annual Updates with
12 the Commission.

13 **Q. Please summarize the Protocols accompanying the Annual Update filings being**
14 **requested as part of the Joint Application for the approval of the 34.5kV FBRs.**

15 A. The Protocols accompanying Members' 34.5kV FBRs lay out the procedure, timeframe, and
16 calculations to be followed during the Annual Update filings. The complete versions of the
17 34.5kV FBR Protocols for each Member are attached to my testimony as Exhibits 3-1
18 through 3-4. Please note that although generally, the Protocols for each Member's 34.5kV
19 FBR are alike, due to the unique regulatory status (as detailed earlier on page 5 of my
20

21 ⁵ The 34.5kV sub-transmission facilities that are the subject of this Joint Application are those 34.5kV facilities
22 now owned or hereafter acquired or constructed by the respective Member and are part of or utilized in
conjunction with the electric system acquired by the Member from Mid-Kansas in the 08-MKEE-099-MIS
Docket.

23 ⁶ The methodology for allocating Southern Pioneer's total resultant retail portion of the 34.5kV revenue
requirement to the individual retail classes and the determination of the ultimate per kWh retail rate adjustment
is detailed in the Southern Pioneer's 34.5kV FBR Protocols attached as Exhibit 3-4 to this testimony.

24 ⁷ It is anticipated that each Member will have a separate Compliance Docket assigned for purposes of its 34.5kV
FBR Annual Update filing.

1 testimony) and in order to align with its existing Commission-approved retail rate making
2 mechanism, the Protocols for Southern Pioneer are slightly different from those of the other
3 three self-regulated Members.⁸ Prefiled Direct Testimony of Mr. Epperson, as well as Exhibit
4 3-4 attached to my testimony further detail Southern Pioneer's 34.5kV FBR Protocols
5 specifically.

6 **Q. Do you believe that the requested procedural schedules as outlined in the Exhibits**
7 **containing the said Protocols provide adequate time for review and consideration of the**
8 **Annual Update by Staff, Interveners, and the Commission?**

9 A. Yes, I do. It is a similar procedural schedule to that which was approved by this Commission
10 in the 13-452 Docket concerning the Southern Pioneer retail distribution Debt Service
11 Coverage Formula Based Rate five-year Pilot Plan ("DSC-FBR Pilot Plan"). The first year
12 of implementation of this procedural schedule was met in 2014 without issue.

13 I would also note that, similar to the Southern Pioneer's DSC-FBR Plan Protocols, the
14 34.5kV FBR Protocols for each Member also contain a list of required information to be
15 included in each annual filing, as well as detailed explanation of the data inputs and
16 calculation algorithms, all of which will assist Staff, Interveners, and the Commission with
17 their audit of these Annual Updates.⁹

18 **PART IV – 34.5KV RATE REGULATION**

19 **Q. Please summarize how the rates for providing the service over the Members' 34.5kV**
20 **sub-transmission facilities are currently regulated?**

23 ⁸ Southern Pioneer's retail rates for its distribution system costs are being established per Debt Service Coverage
Formula Based Rate five year Pilot Plan approved in the 13-452 Docket.

24 ⁹ Complete versions of the 34.5kV FBR Protocols for each Member are attached to my testimony as Exhibits 3-1
through 3-4.

1 A. To recap, the Members use their corresponding 34.5kV sub-transmission facilities to deliver
2 electricity to wholesale LADS customers, as well as to their retail customers. As pointed out
3 earlier, under the current regulatory approach, the LAC rate, which recovers the cost of
4 providing 34.5kV service to wholesale LADS customers, remains KCC-jurisdictional.¹⁰ So,
5 if the cost of providing service over the Member's 34.5kV facilities changes, in order to
6 adjust rates accordingly, the Member would need to file a rate application with the
7 Commission to align those rates with the cost of service ("COS"). Two recent LAC COS
8 applications filed with the Commission in the 15-161 Docket and Docket No. 15-PLCE-176-
9 TAR ("15-176 Docket") are examples of the requests submitted for this precise purpose.

10 **Q. Can you explain in more detail what is meant by 34.5kV sub-transmission facilities and**
11 **the types of services over those facilities?**

12 A. Yes. The Members own, operate, and maintain distribution facilities and 34.5kV sub-
13 transmission facilities, both of which are used in the delivery of electricity to its customers.
14 The distribution facilities are those typically used for the delivery of electricity from the
15 higher voltage transmission system to the end-users of the electricity (retail customers). The
16 34.5kV sub-transmission system is comprised of what may be termed sub-transmission
17 facilities, where these facilities are used to deliver electricity from the higher voltage
18 transmission system (1) directly to wholesale LADS customers who are not end-users; or (2)
19 directly to the Member's respective retail customers served directly off 34.5kV voltage; or
20 (3) to a distribution substation, which then transforms the power to a lower distribution
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22
23 ¹⁰ Additionally, as already mentioned earlier on page 5 of my Testimony, in the case of Southern Pioneer, all of its
24 rates remain regulated by the Commission, either through the DSC-FBR Pilot Plan or through separately filed
25 LAC COS applications.

voltage for delivery to the Member's respective retail customers.¹¹ The direct investments and expenses involved in owning, operating, and maintaining these 34.5kV sub-transmission facilities are recorded separately in the Members' respective accounting system in accordance with the Rural Utilities Service ("RUS") Uniform System of Accounts. Although it was determined these 34.5kV facilities do not meet the qualifications of the "transmission facilities" per Attachment AI to the Southwest Power Pool, Inc.'s ("SPP") Open Access Transmission Tariff, the 34.5 kV sub-transmission facilities that provide service to one or more wholesale LADS customer were agreed to be providing local "transmission service" under Kansas law.¹² This is important to note due to the fact that the Joint Applicant Members are not members of the SPP like Mid-Kansas. Accordingly, the Members utilize the transmission plant and operation and maintenance ("O&M") accounts for their 34.5kV sub-transmission facilities. The table below shows the General Ledger ("GL") accounts used under the RUS system.

<u>Plant Accounts</u>	<u>Function</u>
350-359	Transmission
360-373	Distribution
<u>Expense Accounts</u>	<u>Function</u>
560-579	Transmission
580-599	Distribution

¹¹ In some instances, lower voltage distribution facilities could be used in serving wholesale LADS customers, which is also evidenced in the Applicability and Character of Service sections of the Commission-approved LADS tariffs for the Members.

¹² Order Addressing Joint Motion to Approve Stipulation and Agreement under Docket No. 11-GIME-597-GIE, issued January 11, 2012 (see also the Stipulation and Agreement, filed December 1, 2011 under the same docket).

1 It is important to note however, that aside from the direct cost of providing distribution or
2 34.5kV service, Members incur substantial “common” costs that must be allocated in rates.
3 For example, general plant, such as the headquarters building, is not solely related to either
4 distribution or 34.5kV service, as it is used to support both. Similarly, administrative and
5 general expenses are incurred to support all the functions of the Member. These common
6 costs are part of what it takes to provide both distribution and 34.5kV sub-transmission
7 service, and so they must be shared and become part of the rates for both of these types of
8 service.

9 The requested 34.5kV FBR mechanism assigns and allocates costs attributable to the
10 34.5kV sub-transmission facilities to reflect the cost of providing service over each
11 Member’s 34.5kV sub-transmission facilities.

12 **Q. In terms of establishing the revenue requirement for 34.5kV service, does the requested**
13 **34.5kV FBR mechanism follow prior methodologies filed with this Commission?**

14 A. Yes. The 34.5kV FBR has been designed to utilize essentially the same approach that has
15 been used six times in prior Member rate applications, including most recently the 15-161
16 and 15-176 Dockets. These prior applications referred to this approach as the LAC COS,
17 meaning it establishes the cost of service, or revenue requirement, used in setting the LAC
18 rate.

19 **Q. When you say that the proposed 34.5kV FBR methodology used is essentially the same**
20 **as LAC COS, are there any material differences inherent in using one methodology**
21 **over the other?**

22 A. No, there are no material differences between the two methodologies. The most notable
23 difference is due to the addition of the provision that allows Members the flexibility to apply
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1 either an Operating Times Earned Ratio (“OTIER”) or Modified Debts Service Coverage
2 (“MDSC”) when calculating the margins, whereas the LAC COS approach used a single
3 metric.¹³ However, on the input side, there are only a few minor differences that exist
4 between the 34.5kV FBR and the LAC COS that mainly have to do with deriving the inputs
5 that go into the formula. Further, those input differences are limited and include items
6 related to debt service: while the LAC COS typically uses the historical amounts of debt
7 service principal and interest payments, as well as depreciation expense, the proposed
8 34.5kV FBR allows for projection of these items, adjusting their historical amounts to reflect
9 Budget Test Year (where the latter is defined as the calendar year immediately following the
10 Historical Test Year used).¹⁴ Note that the projection of the debt service – typically, one of
11 the major cost drivers for the Members – has already been utilized in Southern Pioneer’s
12 DSC-FBR Plan approved by the Commission in the 13-452 Docket.

13 **Q. And has the Commission Staff, interveners, or the Commission opposed the use of the**
14 **LAC COS methodology in any prior case?**

15 A. No. I am unaware of any occasion in which Staff, an intervener, or the Commission rejected
16 the use of the LAC COS in whole or even in part. In my opinion, this approach for
17 establishing the cost of providing service over the Members’ 34.5kV sub-transmission
18 facilities has been sufficiently affirmed by the various stakeholders and the Commission.
19
20

21 13 Southern Pioneer is an exception, as, being a CoBank borrower, it utilizes only the MDSC metric as required by
22 its lender.

23 14 In addition, the LAC COS approach customarily direct-assigned the depreciation expense by using transmission
24 plant depreciation and general plant depreciation by either applying the depreciation rate to the plant balances or
25 using the amount in the Trial Balance. The 34.5kV FBR takes a total depreciation expense (that also contains
distribution plant depreciation; note that amortization of Acquisition Premium, if present, is removed via an
adjustment) and allocates it on the Net Transmission Plant allocator.

1 **Q. But has this LAC COS methodology ever been incorporated into a formulaic**
2 **mechanism?**

3 A. Technically, yes. In the 13-452 Docket concerning Southern Pioneer's DSC-FBR Pilot
4 Plan, the Commission approved the Non-Unanimous Settlement Agreement ("SA")
5 implementing an FBR mechanism used to set rates for the recovery of distribution service
6 from Southern Pioneer's retail customers. In determining the cost of providing
7 distribution service, it was necessary to establish a means for separating service over
8 Southern Pioneer's distribution facilities from service over its 34.5kV plant. The
9 methodology agreed to by the parties in the SA and approved by the Commission utilized
10 nearly the same LAC COS approach which is now also being requested for purposes of
11 the Members' 34.5kV FBR; except there, the cost inputs into the revenue requirement
12 were associated with Southern Pioneer's distribution facilities (either direct-assigned, or
13 apportioned using distribution allocators), plus the flow of calculation was tethered to a
14 target coverage (DSC) so that the additional revenues needed and the per unit rate
15 adjustment were calculated based on the difference between the actual achieved DSC and
16 the target DSC (whereas in LAC COS, the flow of calculation for the necessary revenue
17 requirement is reversed to begin with the targeted margins). In a way, the 34.5kV FBR
18 then becomes the mirror image of Southern Pioneer's DSC-FBR Pilot Plan, so that when
19 they are combined, the overall revenue requirement (i.e., representative of costs of
20 owning, operating, and maintaining its entire system comprised of both distribution and
21 34.5kV sub-transmission facilities) is accounted for in totality.¹⁵

22
23 ¹⁵ The fact that the DSC-FBR Pilot Plan uses direct-assigned historical depreciation expense while 34.5kV FBR
24 calculates the latter using Net Plant allocator and allows a projection of the expense is of no consequence, as
25 under the DSC-FBR Pilot Plan, the depreciation is backed out when calculating the Net Operating Margins.

1 **Q. If the 34.5kV FBR methodology practically mirrors the LAC COS methodology that**
2 **has been successfully used in the past, why is it necessary to request this mechanism as**
3 **opposed to continue filing the LAC COS?**

4 A. The request is not intended to improve or “fix” any methodological problems in how the
5 LAC rate is set, but rather to address the regulatory process itself and, specifically, to
6 implement an approach based on a formula, i.e., incorporating more frequent filings based
7 on a predetermined procedure.

8 The benefits of FBR regulation include reduced regulatory costs and lag. In my
9 opinion, these benefits can more readily be recognized and achieved today than in the
10 past. The primary reason is that the customers of the three out of four Members have
11 opted out of Commission retail rate regulation in favor of self-regulation.¹⁶ This means
12 they are no longer required to file rate applications with the Commission to change their
13 retail rates. In my opinion, the fact that they still remain regulated for purposes of the
14 LAC but not the retail rates presents a very unique challenge, one that is different than if
15 the LAC and retail rates still remained jointly regulated as part of overall rates. With the
16 ability to set retail rates by board approval, the Members retain more flexibility in the
17 retail rate setting process. Those retail rates can be updated on a more frequent basis
18 without the costs of a full rate case. However, they do not retain that same flexibility for
19 their LAC. The corresponding 34.5kV FBRs remedy the problem by utilizing an approach
20 that is more efficient for the self-regulated Members with respect to their LAC and their
21 customers while still preserving the Commission’s regulatory authority over the rates for

22
23 ¹⁶ Southern Pioneer is not an electric cooperative organized under K.S.A. 17-4601, but a wholly owned subsidiary
24 of one (Pioneer Electric Cooperative, Inc.). According to K.S.A. 104d, Southern Pioneer cannot opt out of
25 Commission retail rate regulation.

1 services over the 34.5kV facilities. In addition, it provides a mechanism that minimizes
2 the costs of setting the LAC, bringing the costs of setting both the retail rate and LAC
3 more in sync.

4 Additionally, for Southern Pioneer, the requested 34.5kV FBR is complimentary to the
5 Commission-approved DSC-FBR Pilot Plan applicable to the distribution side; and when
6 combined, both the DSC-FBR Pilot Plan and 34.5kV FBR will ensure that its retail and
7 wholesale rates equitably reflect the cost of providing service on an annual basis.¹⁷

8 **Q. Is a formula-based rate a new concept in Kansas?**

9 A. No, it is not. There are formula-based rates in place at the Federal Energy Regulatory
10 Commission (“FERC”) used for setting wholesale rates charged in Kansas for
11 transmission and generation. For example, Mid-Kansas, Kansas City Power & Light
12 (“KCP&L”), and Westar Energy, Inc. (“Westar”) each have a transmission formula-based
13 rate (referred to as transmission formula rate, or TFR) . Westar’s TFR also has a parallel
14 formulaic-mechanism applicable to its unbundled retail transmission rates, referred to as
15 Transmission Delivery Charge, or TDC, which is allowed to be adjusted annually by
16 K.S.A. 66-1237(c).

17 On the generation side, Westar’s Cost-Based Formula Rate Agreement (referred to as
18 generation formula rate, or GFR) for Full Requirements Electric Service was approved by
19 FERC in Docket No. ER-07-1344, based upon a power contract entered into between
20 Westar and the Kansas Electric Power Cooperative, Inc. (“KEPCo”). Cost support for the
21 annual adjustments to Westar’s GFR rates is based upon Westar’s FERC Form 1 and is

22
23 ¹⁷ As discussed earlier, the DSC-FBR Plan only addresses the distribution revenue requirement. At the time the
24 DSC Ratemaking Plan was requested, it was the expectation by Southern Pioneer that ultimately, they and other
25 Mid-Kansas member-systems would develop and request a 34.5kV FBR at a later date.

1 computed using an established formula. This concept was not objected to by the KCC
2 Staff which was a party to the FERC docket – and was ultimately approved by FERC with
3 modifications recommended by non-KCC parties to the docket.

4 Furthermore, this Commission has approved transmission FBRs for the generation and
5 transmission providers of the four distribution cooperatives named as applicants here,
6 namely Sunflower Electric Power Corporation (reference Docket No.13-SEPE-701-TAR)
7 and Mid-Kansas (Docket No.12-MKEE-650-TAR). Additionally, even common riders
8 and surcharge mechanisms such as Energy Cost Adjustment and Property Tax Surcharge
9 are, in essence, examples of formula-based rates.

10 **Q. How would implementation of the requested 34.5kV FBR reduce regulatory costs**
11 **and burdens?**

12 A. Traditional rate applications can be very costly and burdensome due to the complexity and
13 process of a rate application which includes:

- 14 1. Multiple rounds of expert testimony by the applicant, interveners, and Commission
15 Staff.
- 16 2. Substantial analytical modeling by the applicant and its experts, along with
17 interveners and Commission Staff.
- 18 3. Multiple rounds of discovery involving the applicant, interveners, and Commission
19 Staff.
- 20 4. Substantial auditing requirements due to the adjustments typically requested.

21 In contrast, since the 34.5kV FBR templates and protocols would be predetermined,
22 the process should require very little consulting, legal, or even Staff and CURB costs. In
23 addition, it should require less internal resources for the same reasons.

24

25

I would anticipate that under the requested 34.5kV FBR, Member staff could complete the audit of the formula calculation and would engage consulting and legal assistance only for review and or document/filing preparation purposes. The requested FBR uses commonly used historical financials and includes very few adjustments, so that the audit by Commission Staff and interveners would be much less burdensome and costly. Related, the need for discovery would be reduced given the 34.5kV FBR Protocols for each Member's 34.5kV FBR (attached to my testimony as Exhibits 3-1 through 3-4) specify most, if not all, of the information needed to verify the population of the formula template.

Q. Are there other benefits to an FBR mechanism that the Commission should consider?

A. Yes. The FBR mechanism provides the following additional benefits:

1. More frequent review of rates (i.e., annually) to ensure rates remain based on and aligned with the cost of service.
2. Helps avoid rate shock by resulting in smaller, more frequent rate changes.

PART V – 34.5KV FBR MECHANISM COMPONENTS

A. TEMPLATES AND PROTOCOLS

Q. Have you included Templates and Protocols for the requested 34.5kV FBR mechanism?

A. Yes. I have included both sample templates, showing the assessment/calculation that would be made and filed by each Member annually, beginning in 2016, and the Protocols governing each Member's 34.5kV FBR. Blank formula templates for each Member are provided in Exhibit 1-1 through 1-4. Exhibits 2-1 through 2-4 include populated templates for each Member using the 2013 data. Exhibits 3-1 through 3-4 contain the Protocols for the Members' respective 34.5kV FBRs.

1 **Q. Why do the populated templates you included use 2013 data - was 2014 data not**
2 **available?**

3 A. I used 2013 data because when we began developing the FBR mechanism for the Members,
4 this was the most recently available data. Since that time, 2014 data has become available.
5 However, since a rate change is not being requested in this application but only the
6 mechanism itself, it was determined that fully auditing the 2014 data and updating the
7 templates was neither needed nor a good use of resources. The 2013 populated templates are
8 provided as examples only and are adequate to interpret and understand fully how the
9 mechanism will work. In addition, using the 2013 data has an added advantage - for two of
10 the Members, this data represents figures approved by the Commission in prior filings (15-
11 507, 15-161, and 15-176 Dockets), meaning Staff is already familiar with these inputs.

12 **Q. Please explain in more detail the requested 34.5kV FBR mechanism process and the**
13 **methodology.**

14 A. By May 1 of each year, each Member will complete its formula worksheet template, as
15 provided in the attached Exhibits 1-1 through 1-4, and make an Annual Update filing with
16 the Commission. The templates will be populated by each Member using their financial,
17 operating, and billing data from the year-end Statement of Operations, Trial Balance, Payroll
18 Journal, and the Budget.

19 The formula utilized in each of the Member's corresponding 34.5kV FBR, based upon
20 the input and work papers, produces the total 34.5kV system revenue requirement for each
21 Member. The revenue requirement is then divided by the respective annual billing units
22 (both retail and wholesale billing demand on the 34.5 kV system) to produce a system-wide
23 rate (meaning common for wholesale and retail) for 34.5kV service for each Member. This
24
25

1 becomes the LAC - the per unit demand rate charged to wholesale LADS customers directly.
2 In the case of Southern Pioneer, the calculation of a system-wide rate for 34.5kV also enables
3 the determination of the costs to be recovered from the retail customers through the retail rate
4 schedules. To achieve this, there is an additional step needed to allocate the total retail share
5 of the 34.5kV cost of service to each applicable rate schedule and then modify the retail per
6 kWh rates accordingly. I will discuss this later in my testimony.

7 Therefore, the major components of the calculation (shown in more detail in Exhibits 1-1
8 through 1-4), common to all four Members, but completed separately, are as follows:

- 9 A. Determination of the Revenue Requirements;
- 10 B. Utilizing the 34.5 kV Billing Determinants; and
- 11 C. Calculation of the resultant LAC rate.

12 This is the same general methodology as was applied in determining the LAC for all of the
13 Members as included in the following prior Commission Docket Nos. 09-969, 11-439, 12-
14 491, 15-161, and 15-176. This methodology is based on principles of cost causation.

15 **Q. Are there any additional steps included?**

16 A. Yes. Similar to the latest LAC COS filings in the 15-161 and 15-176 Dockets, there are three
17 additional steps included that were not a part of the earlier LAC COS filings. Specifically:

- 18 1. Recognition of adjustments to the operating expenses performed per Commission-
19 adopted policy for excluding dues and donations.
 - 20 2. Recognition of the Property Tax Surcharge ("PTS") rider rate revenues, as applicable
21 (two of the four Members have implemented the PTS that helps collect a portion of
22 the 34.5kV Revenue Requirement associated with the Property Tax expense).
- 23
24
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- 1 3. Allocation of the retail portion of the revenue adjustment to individual classes (as
2 discussed earlier, this step is applicable to Southern Pioneer only).

3 **Q. Please discuss the recognition of the adjustments to the Member's operating expenses**
4 **per Commission-adopted policy in conjunction with K.S.A. 66-101f(a).**

5 A. In accordance with policy adopted per K.S.A. 66-101f(a), the Commission historically
6 approved certain Staff-recommended adjustments related to the treatment of expenses for
7 corporate advertising and dues, donations, and charitable contributions. Typically, such
8 adjustments affect the Member's Administrative and General and/or Other Deductions
9 expense categories.¹⁸ Accordingly, Member's 34.5kV FBR templates include place holders
10 for inclusion of such adjustments (see page 1, Column (e), Line 10 and Line 18 of Exhibits 1-
11 1 through 1-4 (blank templates, or Exhibits 2-1 through 2-4 (populated templates)).¹⁹ Each
12 year, at the time of the annual 34.5kV FBR update filing, the Member will perform these
13 adjustments to be included in the Revenue Requirement calculation and applied as a
14 reduction to the associated expenses by following the guidelines included in the Protocols
15 (which are based on K.S.A. 66-101f(a) and prior docket history). Additionally, the Members
16 will supply sufficient detailed information necessary for the Commission Staff and
17 interveners to audit the corresponding adjustments.

18 **Q. Please discuss the adjustment to recognize PTS rider rate revenues.**

19 A. Two of the Members have a Commission approved PTS rider in place that is applicable to
20 both retail and wholesale LADS customers. As a result, a portion of the 34.5kV revenue

22 ¹⁸ If any lower voltage distribution facilities are used for service to LADS wholesale customers, an appropriate
23 portion of Distribution O&M is allocated to the 34.5kV FBR, as specified in each of the Member's 34.5kV FBR
24 Protocols.

24 ¹⁹ If conditions described in the footnote above are present, then additional adjustments per K.S.A. 66-101f(a) will
25 be also be present on page 1, Column (e), Lines 5-6 of each 34.5kV FBR template.

1 requirement (i.e., change in property tax expense) is being recovered via the PTS rider. In
2 order to recognize the 34.5kV portion of the revenue stream collected through this surcharge,
3 the Commission-approved PTS in effect applicable to the 34.5kV system users will be
4 subtracted from the initial per kW cost to arrive at the final, or “net,” LAC rate. This step is
5 evidenced on page 1, Lines 33-35 on Exhibits 1-1 (Prairie Land’s blank template) or Exhibit
6 2-1 (Prairie Land’s populated template), and page 1, Lines 34-46 on Exhibit 1-4 (Southern
7 Pioneer’s blank template) or Exhibit 2-4 (Southern Pioneer’s populated template).

8 **Q. What underlying data will form the basis for establishing the 34.5kV FBR revenue**
9 **requirement?**

10 A. Accounting costs as recorded on the Member’s books will be used in the analysis.
11 Specifically, the calculation will be based upon the December Statement of Operations, Trial
12 Balance, and Payroll Journal for the prior year, as well as Budget for the next year, and any
13 other supplemental schedules as necessary to facilitate the Staff’s and interveners’ review
14 and audit of the 34.5kV FBR.

15 **Q. Will any adjustments be made to the actual results in completing the above steps?**

16 A. Yes. The templates pre-define and limit the adjustments to only the following, which are
17 intended to ensure the Members’ 34.5kV FBRs are sustainable to accommodate a variety of
18 future situations. The Protocols further detail these adjustments. Below is the summary:

- 19 • Long-Term Interest, Interest-Other, Interest Charged to Construction, and Depreciation
20 Expenses in the Test Year will be adjusted to the budgeted amounts.
- 21 • The actual debt service payments (principal and interest) in the Test Year will be adjusted
22 to the budgeted amounts.

23

24

25

1 **Q. Why will the 34.5kV FBR calculation include the budgeted margin requirements?**

2 A. Using budgeted long-term interest and principal payments in determining the return
3 requirement will help reduce regulatory lag, ensuring that the companies can support future
4 capital investment requirements to continue providing safe and reliable power to existing and
5 new customers.

6 **Q. You stated that the 34.5kV revenue requirement is comprised of operating expenses**
7 **and a return requirement. Please describe how the return requirement will be**
8 **determined.**

9 A. Each Member's return requirement will be based upon either a Times Interest Earned Ratio
10 ("TIER") or Debt Service Coverage ("DSC") ratio. Both the TIER and DSC are measures of
11 an organization's ability to pay its debt obligations.

12 **Q. Please explain the TIER and DSC ratios.**

13 A. Again, both are broadly accepted coverage ratios aimed at assessing the ability of the
14 utility to service its debt. Debt issuers often include minimum coverage ratios that must
15 be maintained by the borrower for precisely this reason. While each ratio type has
16 variations, a general definition of each is below:

17 TIER = The TIER ratio is the ratio of annual earnings before interest of a business to
18 its annual interest expense. As such, it is a measure of the long-term viability or
19 solvency of a business in terms of being able to pay off its debts.

20 DSC = The DSC ratio is the ratio of cash flows available to annual interest and
21 principal payments on debt. Like TIER, it is a measure of the ability of the utility to
22 pay its debt obligations.

23

24

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As noted previously, there are a number of variations as to the numerator of these ratios; namely, the income used. For example, when using only operating income, the ratio is typically deemed an Operating TIER/DSC (“OTIER”). When using net income, the ratio may be referred to as simply TIER/DSC or sometimes Net TIER/DSC. Somewhat of a hybrid would be the Modified TIER/DSC (“MDSC”), in which case certain non-operating income/expense is included or excluded.

Q. For purposes of the each Member’s 34.5kV FBR, what level of margin are you recommending?

A. I am recommending the following ratios be used:

Table 1

Member	Ratio	Minimum Required	Recommended Level
Prairie Land	OTIER/MDSC	1.10/1.35	1.8
Victory	OTIER/MDSC	1.10/1.35	1.8
Western	OTIER/MDSC	1.10/1.35	1.8
Southern Pioneer ²⁰	MDSC	1.35	1.75

Q. Why are you recommending both an OTIER and MDSC be used in the FBR template for Prairie Land, Victory, and Western?

A. This is for a few reasons. First, each of the above mentioned Members is currently obligated to an RUS mortgage covenant of not less than a 1.1 OTIER (i.e., a 1.1 OTIER is the

²⁰ Southern Pioneer’s MDSC calculation, evident from the recent Southern Pioneer’s DSC-FBR Pilot Plan, as well as 15-161 LAC COS Docket, is as specified by its lender, CoBank (it slightly varies from the generally-adopted National Rural Utilities Cooperative Finance Corporation, or CFC, formula).

1 minimum). In addition, each also borrows from the National Rural Utilities Cooperative
2 Finance Corporation (“CFC”) or CoBank, which both have a 1.35 MDSC minimum
3 requirement. Therefore using both will OTIER and MDSC will ensure that these Members
4 will have rates that meet both mortgage covenants. It is possible based upon debt maturity,
5 amortization schedules and plant investments that a Member’s margins could switch from
6 being OTIER driven to MDSC driven or vice versa. Including both in the FBR template
7 simply provides for a more robust and sustainable mechanism going forward.²¹

8 **Q. Is it necessary for each of the Members to operate at a financial ratio above the**
9 **minimum required by its lender?**

10 A. Yes. As stated, the minimums are just that; they are minimums and should not be viewed as
11 targets or optimal levels. It is necessary to build in some “buffer” above these minimums to
12 deal with contingencies such as variability in sales and unexpected costs. If this is not
13 included, a cool summer may be all it takes to drop margins below the minimum
14 requirement. Ultimately, this buffer will facilitate improvement of capital structure (i.e.,
15 equity ratio) to meet the standards of its lender, stabilize its financial condition and ensure
16 that the rates for this service are equitably contributing to the financial success of the
17 Member rather than being subsidized by the other retail rates.

18 **Q. Is it common for cooperatives in Kansas and in the United States to operate at financial**
19 **ratios that exceed the minimum required by lenders?**
20
21
22

23 ²¹ As proposed, the 34.5kV FBR templates for Prairie Land, Victory, and Western currently use the greater of the
24 MDSC or OTIER, i.e., meaning the ratio that results in a greater net margin requirement is used in
25 determination of the Revenue Requirement, as evident in Exhibits 2-1 through 2-4 attached to my testimony.

A. Absolutely. In fact, the following Table 2 provides information on the national and state median OTIER in the most recent five years as determined by CFC for its electric cooperative borrowers.

Table 2 Summary of OTIER (2009-2013 Median Values) <i>Source: CFC Key Ratio Trend Analysis</i>		
Year	National	Kansas
2009	1.71	1.76
2010	1.91	1.91
2011	1.80	1.81
2012	1.77	1.69
2013	1.94	1.92
<i>Ave.</i>	<i>1.83</i>	<i>1.82</i>

As can be seen in the above table, the median OTIER in Kansas has recently ranged from 1.69 to 1.92, with an average of 1.82. Based on the above information, the cushion for electric cooperatives in Kansas is about 0.72 (1.82 - 1.1). The cushion embedded in the 1.80 target recommended for the 34.5 kV FBR is slightly less at 0.69.

Table 3 below provides information on the national and state median MDSC in the most recent five years as determined by the CFC for its electric cooperative borrowers.

Table 3 Summary of Modified DSC (2009-2013 Median Values) <i>Source: CFC Key Ratio Trend Analysis</i>		
Year	National	Kansas
2009	1.85	1.70
2010	1.95	1.86
2011	1.81	1.78
2012	1.81	1.76
2013	1.87	1.90
<i>Ave.</i>	<i>1.86</i>	<i>1.80</i>

As can be seen in the above table, the median MDSC in Kansas has recently ranged from 1.70 to 1.90, with an average of 1.80. It should be noted that both CoBank and CFC typically require borrowers to achieve a 1.35 MDSC ratio, though the specific formulas can vary slightly. Based on the above information, the MDSC cushion for electric cooperatives in Kansas is about 0.45 (1.80 - 1.35). The cushion embedded in the MDSC target for the requested 34.5kV FBR is the same or lower at 0.40 – 0.45.

In both the OTIER and MDSC cases, my recommended margin levels are at or below both the 2013 results and the five-year average of electric cooperatives in Kansas and the country as reported in the CFC Key Ratio Trend Analysis.

It should be pointed out that the lender minimums are in place to identify the point at which a utility's solvency and ability to repay its debts is at risk. Clearly, a utility should not normally operate on the edge of this minimum but should target a coverage ratio that provides an adequate cushion.

Q. You mentioned that targeting a coverage ratio in excess of the minimum loan covenant will help improve the capital structure of the Members. Can you please summarize the capital structure for each?

A. Using 2013 year-end financial statements, I have summarized in Table 4 each Member's equity ratio as a percent of total capitalization. This has been prepared using the margins and equities as stated on the balance sheet and then again excluding its investment/equity in Mid-Kansas.²² It is informative to look at the equity without the investment in Mid-Kansas as the remainder represents the equity generated by the operations of the respective Member itself.

²² Using CFC formulas guidelines from the 2013 CFC KRTA to compute the ratios.

Although it may accumulate an equity share in Mid-Kansas, such equity and margins are generated by Mid-Kansas' wholesale rates and may not be available as cash.

Table 4

Equity Positions as of 12/31/13		
<u>I. Equity as a Percent of Total Capitalization</u>		
Member (Mid-Kansas division)		Ratio
Prairie Land		19.20
Southern Pioneer		1.81
Victory		20.62
Western		4.26
National Median (CFC KRTA)		49.49
State Median (CFC KRTA)		47.31
<u>II. Distribution Equity</u>		
<u>Member (Mid-Kansas Division)</u>		Ratio
Prairie Land		17.19
Southern Pioneer		1.59
Victory		19.65
Western		3.22
National Median (CFC KRTA)		35.94
State Median (CFC KRTA)		37.54

B. RATE DESIGN

Q. Near the beginning of your testimony, you stated that the 34.5kV FBR will affect the wholesale rate for 34.5kV service (a.k.a. LAC rate) for each of the Members. Please explain.

A. The final step in the formula is to calculate the rate for 34.5kV service by dividing the 34.5kV revenue requirement by the 34.5kV billing determinants. In this case, the revenue requirement is determined by the formula as previously explained. The billing determinants equal the billing demand which is defined in each Member's LAC rate schedule. The result is a 34.5kV system-wide (meaning common for wholesale and retail) \$/kW demand rate. In

1 other words, the rate includes the total 34.5kV system costs and total 34.5kV system billing
2 determinant such that the resulting rate would be appropriate for all customers, whether
3 wholesale or retail.²³ This is the same approach that has been used in previous applications
4 concerning the rates for 34.5kV service.

5 **Q. Why is this important?**

6 A. As stated earlier, such approach ensures that each customer group is charged only for its
7 equitable share of the total system costs and does not subsidize the other. The rate essentially
8 allocates the total 34.5kV system revenue requirement between wholesale and retail users
9 based upon each customer group's (i.e., wholesale and retail) share of the total billing
10 determinants. In this way, it is essentially using a load ratio share allocation, which is typical
11 for the allocation of transmission-related costs. So, the wholesale customers will pay a LAC
12 rate that is appropriately based on their pro-rata cost of service, no more and no less.

13 **Q. Earlier, you stated that, with the exception of Southern Pioneer, this 34.5kV FBR will**
14 **not affect the retail rates charged for 34.5kV service. Does the 34.5kV FBR therefore**
15 **create an opportunity for subsidization between retail and wholesale customers?**

16 A. No. Again, consistent with my earlier assertion, the LAC rate for wholesale customers is set
17 for the entire system (i.e., both wholesale and retail) and is based upon the appropriate
18 expenses and margin requirements of the entire system. There is no way that the Members
19 can, for example, increase the margin coming from the LAC rate in order to subsidize how
20 much 34.5kV revenue requirement is allocated to retail customers.

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23 ²³ Although, as explained earlier in my testimony, the retail customers are not billed this resultant \$/kW demand
24 rate explicitly as the wholesale LADS customers; instead, the retail component/share of the 34.5kV costs is
25 embedded in retail base rates (\$/kWh energy rates), so to allocate the retail share of the 34.5kV costs to the
retail customers, it is necessary to convert from a demand LAC rate to an energy rate adjustment.

1 To recap, while the retail rates are under the authority of each Member's Board of
2 Trustees (with the exception of Southern Pioneer), the level of those rates will have
3 absolutely no bearing on the resulting LAC rate charged to wholesale LADS customers; and
4 so the Commission can be assured that implementation of the 34.5kV FBR will produce a
5 cost of service-based LAC rate.

6 **Q. Should the Commission be concerned then that the requested FBR mechanism does not**
7 **require the adjustment of retail rates, with the exception of Southern Pioneer?**

8 A. No. This is the current regulatory status concerning retail versus wholesale rates regardless of
9 whether or not the Commission approves the requested 34.5kV FBR mechanism or not; and
10 the Joint Application does not introduce any subsidization concern. For Prairie Land,
11 Victory, and Western, the Commission has authority over the LAC rate for wholesale LADS
12 customers, and so the primary purpose of these Members' 34.5kV FBR should be to ensure
13 that the LAC rate is set appropriately for those customers. Overall, the 34.5kV FBR
14 mechanism being requested makes no change to the scope of the Commission's authority to
15 regulate rates for the Members.

16 **Q. Concerning Southern Pioneer, this FBR mechanism will affect both the LAC rate for**
17 **wholesale LADS customers and the retail rates for retail customers? Please explain?**

18 A. Yes, that is true. Just like the other Members, Southern Pioneer's 34.5kV revenue
19 requirement is currently recovered through a combination of its separate LAC rate applicable
20 to the wholesale LADS customers and through its retail rates, which essentially embed the
21 resulting 34.5kV rate in its base retail rates. However, contrary to the other Members,
22 Southern Pioneer's retail rates remain under the regulatory authority of this Commission. Its
23 local Board of Directors cannot change retail rates to reflect any change in the cost of
24
25

1 providing 34.5kV service absent approval by the Commission. Therefore, for Southern
2 Pioneer, the 34.5kV FBR will include an additional retail rate design step to flow the FBR
3 results through to the retail rates.²⁴

4 **Q. Please discuss how you propose to allocate the retail portion of the Southern Pioneer**
5 **34.5kV FBR revenue adjustment to the Southern Pioneer individual retail rate classes.**

6 A. The first step in completing this allocation is to determine the retail portion of the necessary
7 revenue adjustment. The retail portion of the 34.5kV FBR revenue adjustment is determined
8 by calculating the difference between the newly calculated and the current (old) LAC rates,
9 times the historical retail billing units, which is documented on page 2, Section I of Exhibit
10 1-4 (Southern Pioneer's blank template) and Exhibit 2-4 (Southern Pioneer's populated
11 template).

12 Next, the portion recoverable from the retail customers is allocated to each retail class in
13 a similar manner as Southern Pioneer's DSC-FBR Pilot Plan for the distribution costs, as
14 approved by the Commission in the 13-452 Docket and updated in the 14-507 Docket.
15 Namely, I have apportioned the retail rate adjustment resulting from the 34.5kV FBR using
16 the Test Year base revenues as follows:

- 17 1. First, all power costs recovered in rates are removed from the historical schedule
18 revenues to arrive at the base revenues by rate schedule.
- 19 2. Next, the ratio (expressed in percentages) of base revenue by schedule to the total
20 base revenues is determined.

21
22
23 ²⁴ Correspondingly, Southern Pioneer's 34.5kV FBR Protocols will include additional provisions governing such
24 34.5kV retail rate adjustment.
25

1 3. The base revenue ratios are then applied to the 34.5kV FBR-determined retail
2 revenue adjustment to establish each rate schedule's apportioned revenue adjustment.

3 Page 9, Section II of Exhibit 1-4 (Southern Pioneer's blank template) and 2-4 (Southern
4 Pioneer's populated template) summarizes the results of this process.

5 **Q. For Southern Pioneer, please describe how you recommend that a retail rate**
6 **adjustment be implemented.**


7 A. I recommend that Southern Pioneer's 34.5kV FBR mirror the approach approved by the
8 Commission for implementing DSC-FBR Pilot Plan adjustments, where each rate
9 schedule-specific apportioned revenue adjustment is divided by the energy usage recorded
10 for that rate class during the Historical Test Year to arrive at the per unit energy rate
11 adjustment to be applied to the retail customer base rates, as illustrated on page 2, Part II,
12 Col. (k) in Exhibit 1-4 (Southern Pioneer's blank template) and Exhibit 2-4 (Southern
13 Pioneer's populated template).


14 **Q. Does this conclude your prefiled Direct Testimony?**

15 A. Yes, it does.
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[illegible]


Richard J. Macke

 Terri J. Pemberton
NOTARY PUBLIC - STATE OF KANSAS
MY APPT EXP: 1/22/17


Notary Public

My appointment expires: 1/22/17

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Revenue Requirement and Rate Calculation
For the Historical Test Year Ending December 31, xxxx

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
Line			Unadjusted		Adjusted			FBR
No	Description	Source	Historical Test Year [xxxx]	Adjustments No. Amount	Historical Test Year [xxxx]	Allocation Factor Name Factor		Revenue Requirement
				Source: WP2		Source: WP3		
1	Operating Expenses							
2	Power Production Expense	WP1, L29, Col (d)	-		\$ -		0.000000 \$	-
3	Cost of Purchased Power	WP1, L30, Col (d)	\$ -		\$ -		0.000000 \$	-
4	Transmission O&M	WP1, L31, Col (d)	\$ -		\$ -		1.000000 \$	-
5	Distribution Expense-Operation	WP1, L32, Col (d)	\$ -	[1] \$ -	\$ -	DOM	#DIV/0!	#DIV/0!
6	Distribution Expense-Maintenance	WP1, L33, Col (d)	\$ -	[2] \$ -	\$ -	DOM	#DIV/0!	#DIV/0!
7	Consumer Accounts Expense	WP1, L34, Col (d)	\$ -		\$ -		0.000000 \$	-
8	Customer Service and Informational Expense	WP1, L35, Col (d)	\$ -		\$ -		0.000000 \$	-
9	Sales Expense	WP1, L36, Col (d)	\$ -		\$ -		0.000000 \$	-
10	Administration & General	WP1, L37, Col (d)	\$ -	[3] \$ -	\$ -	LAB	#DIV/0!	#DIV/0!
11	Total O&M Expense	Sum (L2:L10)						#DIV/0!
12	Depreciation and Amortization	WP1, L38, Col (d)	\$ -	[4] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
13	Property Tax	WP1, L43, Col (d)	\$ -		\$ -	NP	#DIV/0!	#DIV/0!
14	Other Taxes	WP1, L44, Col (d)	\$ -		\$ -	NP	#DIV/0!	#DIV/0!
15	L.T. Interest	WP1, L45, Col (d)	\$ -	[5] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
16	Interest Charged to Construction - Credit	WP1, L46, Col (d)	\$ -	[6] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
17	Interest-Other	WP1, L47, Col (d)	\$ -	[7] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
18	Other Deductions	WP1, L48, Col (d)	\$ -	[8] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
19	Total Cost of Electric Service							#DIV/0!
20								
21	Margin Requirement							
22	Principal Payments	WP1, L62, Col (d)	\$ -	[9] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
23	L.T. Interest	L15	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
24	Subtotal	Sum (L22:23)						#DIV/0!
25	Required Coverage Ratio	WP1, L64, Col (d)						1.80
26	Gross Margin Requirements	L24 x L25						#DIV/0!
27	Less: Offsets to Margin Requirements	WP4, L4 or L11, Col (i)						#DIV/0!
28	Net Margin Requirement	L26 - L27						#DIV/0!
29								
30	Total Revenue Requirements							
31	Using the greater of OTIER or MDSC Margin Requirements	L19 + L28						#DIV/0!
32	Divided By Total (Retail and Wholesale) Billing Demand	WP5, L30, Col (Total)						0 kW
33	Unadjusted Unit Rate	L31 / L32						#DIV/0!
34	Less: Property Tax Surcharge	Dkt. No.						\$0.00/kW-mo.
35	Resultant Unit Rate							#DIV/0!

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 1 - Input Data
For the Historical Test Year Ending December 31, xxxx

Line No	Description	Source	(b)	(c)	Amount	(d)	(e)	Notes	(f)
1	A. Net Plant in Service								
2									
3	1. Facilities Used to Provide Local Access Delivery Service								
4	Transmission Facilities								
5	350 Land and Land Rights	Trial Balance	\$	-					
6	352 Structures and Improvements	Trial Balance	\$	-					
7	353 Station Equipment	Trial Balance	\$	-					
8	355 Poles and Fixtures	Trial Balance	\$	-					
9	356 O.H. Conductors and Devices	Trial Balance	\$	-					
10	358 U.G. Conductors and Devices	Trial Balance	\$	-					
11	Subtotal	Sum(L5:L10)	\$	-	\$	-		GL acct 108.5	
12	Distribution Facilities (If Applicable)								
13	360 Land and Land Rights	Company Direct Assessment			N/A		N/A		
14	361 Structures and Improvements	Company Direct Assessment			N/A		N/A		
15	362 Station Equipment	Company Direct Assessment			N/A		N/A		
16	Subtotal	L13 + L15	\$	-	\$	-			
17	Total	L11 + L16	\$	-	\$	-			
18									
19	2. All Facilities								
20	301-301 Intangible Plant	Trial Balance		-		-			
21	350-359 Transmission Plant	Trial Balance	\$	-	\$	-		GL acct 108.5	
22	360-373 Distribution Plant	Trial Balance	\$	-	\$	-		GL acct. 108.6,108.61	
23	389-399 General Plant	Trial Balance	\$	-	\$	-		GL acct. 108.7-108.78	
24	Total		\$	-	\$	-			
25									
26									
27									
28	B. Operating Expenses								
29	Power Production Expense	Statement of Operations	\$	-					
30	Cost of Purchased Power	Statement of Operations	\$	-					
31	Transmission O&M	Statement of Operations	\$	-					
32	Distribution Expense-Operation	Statement of Operations	\$	-					
33	Distribution Expense-Maintenance	Statement of Operations	\$	-					
34	Consumer Accounts Expense	Statement of Operations	\$	-					
35	Customer Service and Informational Expense	Statement of Operations	\$	-					
36	Sales Expense	Statement of Operations	\$	-					
37	Administrative and General	Statement of Operations	\$	-					
38	Depreciation and Amortization	Statement of Operations	\$	-	\$	-			
39	Depreciation Expense - Distribution	Trial Balance	\$	-					
40	Depreciation Expense - Transmission	Trial Balance	\$	-					
41	Depreciation Expense - General Plant	Trial Balance	\$	-					
42	Amortization of AP (booked within Depreciation Expense)	Trial Balance	\$	-					
43	Property Tax	Statement of Operations	\$	-					
44	Other Taxes	Statement of Operations	\$	-					
45	L.T. Interest	Statement of Operations	\$	-	\$	-			
46	Interest Charged to Construction - Credit	Statement of Operations	\$	-	\$	-			
47	Interest-Other	Statement of Operations	\$	-	\$	-			
48	Other Deductions	Statement of Operations	\$	-					
49									
50	C. Payroll								
51	Transmission	Payroll Journal (Labor Amt)	\$	-				Part of GL acct	
52	Distribution	Payroll Journal (Labor Amt)	\$	-				560-573	
53	Customer Accounting	Payroll Journal (Labor Amt)	\$	-				580-598	
54	Customer Service and Information	Payroll Journal (Labor Amt)	\$	-				901-905	
55	Sales	Payroll Journal (Labor Amt)	\$	-				907-910	
56	Administration and General	Payroll Journal (Labor Amt)	\$	-				911-916	
57	Total	Payroll Journal (Labor Amt)	\$	-				920-932	
58			\$	-				Non-capitalized items	
59									
60	D. Miscellaneous								
61	1. Debt Service								
62	Principal Payments	Supplementary Company Records	\$	-	\$	-		Source/Notes	Per Company records.
63									
64	2. Target OTIER/MDSC	As approved by Commission			1.80				Proposed value in this year's filing
65									
66	3. Margin Requirement Offsets								
67	Investment in Associate Organizations - Patronage Capital	Balance Sheet	\$	-	\$	-			
68	Generation & Transmission Capital Credits	Statement of Operations	\$	-					
69	Other Capital Credits and Patronage Dividends	Statement of Operations	\$	-					
70	Non-Operating Margins - Interest	Statement of Operations	\$	-					
71	Cash Received from G&T/Lenders	Supplementary Company Records	\$	-					Per Company records.
72									
73	4. Other								
74	AP Amortization Booked in Other Deductions	Supplementary Company Records	\$	-					Per Company records.

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 2 - Adjustments To Historical Test Year Expenses
For the Historical Test Year Ending December 31, xxxx

<u>Line No</u>	<u>Type</u>	<u>Source</u>	<u>Amount</u>	<u>Notes</u>
1	1. Adjustment to Distribution Operations Expense per K.S.A. 66-101f(a), if any:			
2	Applicable Disallowance - Distribution Operations	WP6	\$ -	
3	Total Adjustment	L2	<u>\$ -</u>	
4				
5	2. Adjustment to Distribution Maintenance Expense per K.S.A. 66-101f(a), if any:			
6	Applicable Disallowance - Distribution Maintainance	WP6	\$ -	
7	Total Adjustment	L6	<u>\$ -</u>	
8				
9	3. Adjustment to Administrative & General per K.S.A. 66-101f(a), if any:			
10	Applicable Disallowance - A&G	WP6	\$ -	
11	Total Adjustment	L10	<u>\$ -</u>	
12				
13	4. Adjustment to Depreciation Expense			
14	Historical Amount	Pg.1, L12, Col (d)	\$ -	
15	Projected	WP1, L38, Col (e)	\$ -	
16	Total Adjustment	L15 - L14	<u>\$ -</u>	
17				
18	5. Adjustment to LT Interest			
19	Historic Amount	Pg.1, L15, Col (d)	\$ -	
20	Projected Amount	WP1, L45, Col (e)	\$ -	
21	Total Adjustment	L20 - L19	<u>\$ -</u>	
22				
23	6. Adjustment to Interest Charged To Construction			
24	Historical Amount	Pg.1, L16, Col (d)	\$ -	
25	Projected Amount	WP1, L46, Col (e)	\$ -	
26	Total Adjustment	L25 - L24	<u>\$ -</u>	
27				
28	7. Adjustment to Interest-Other			
29	Historical Amount	Pg.1, L17, Col (d)	\$ -	
30	Projected Amount	WP1, L47, Col (e)	\$ -	
31	Total Adjustment	L30 - L29	<u>\$ -</u>	
32				
33	8. Adjustment to Other Deductions:			
34	Historical Amount	Pg.1, L18, Col (d)	\$ -	
35	Less: Amortization of AP booked in Other Deductions	WP1, L74, Col (e)	\$ -	
36	Historical Amount with AP removed	L34 - L35	\$ -	
37	Sub-total Adjustment	L36 - L34	\$ -	
38	Less: Applicable Disallowance - Other Deductions	WP6	\$ -	
39	Total Adjustment	L37 - L38	<u>\$ -</u>	
40				
41	9. Adjustment to Principal Payments			
42	Historical Amount	Pg.1, L22, Col (a)	\$ -	
43	Projected Amount	WP1, L62, Col (e)	\$ -	
44	Total Adjustment	L43 - L42	<u>\$ -</u>	
45				

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 3 - Allocation Factors
For the Historical Test Year Ending December 31, xxxx

<u>Line No.</u>	<u>Description</u>	<u>Source</u>	<u>Allocator</u>	<u>Amount</u>
1	Distribution O&M Allocation Factor			
2	Distr. Plant used to provide Local Access Delivery Service	WP1, L16, Col (d)		\$ -
3	Total Distribution Plant	WP1, L22, Col (d)		\$ -
4				
5	Allocation Factor	L2 / L3	DOM	#DIV/0!
6				
7	Labor Allocation Factor			
8	Transmission Wages	WP1, L51, Col (d)		\$ -
9	Allocated Distribution Wages			
10	Total Distribution Wages	WP1, L52, Col (d)		\$ -
11	Allocation Factor	L5	DOM	#DIV/0!
12		L10 * L11		#DIV/0!
13	Total LAC Wages	L8 + L12		#DIV/0!
14				
15	Total Wages Other than A&G			
16	Total Wages	WP1, L57, Col (d)		\$ -
17	Less: Administration & General Wages	WP1, L56, Col (d)		-
18		L16 - L17		\$ -
19				
20	Transmission Labor Allocator	L13 / L18	LAB	#DIV/0!
21				
22	Net Plant Allocation Factor			
23	Plant-in-Service			
24	Transmission	WP1, L11, Col (d)		\$ -
25	Distr. used to provide Local Access Service	L2		\$ -
26	General Plant			
27	Total General Plant	WP1, L23, Col (d)		\$ -
28	Allocation Factor	L20	LAB	#DIV/0!
29		L27 * L28		#DIV/0!
30	Total LAC Plant-in-Service	L24 + L25 + L29		#DIV/0!
31				
32	Accumulated Reserves for Depreciation			
33	Transmission	WP1, L11, Col (e)		\$ -
34	Distribution Used in LAC	WP1, L16, Col (e)		\$ -
35	Allocated General Plant			
36	Total General Plant	WP1, L23, Col (e)		\$ -
37	Allocation Factor	L20	LAB	#DIV/0!
38		L36 * L37		#DIV/0!
39	Total LAC Accum. Depr. Res.	L33 + L34 + L38		#DIV/0!
40				
41	Net Plant Used in LAC	L30 - L39		#DIV/0!
42				
43	Total Plant in Service	WP1, L24, Col (e)		\$ -
44	Less: Total Accum. Reserves for Depr.	WP1, L24, Col (e)		\$ -
45	Total Net Plant	L43 - L44		\$ -
46				
47	Transmission Net Plant Allocator	L41 / L45	NP	#DIV/0!

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 4 - Margin Requirement Offsets
For the Historical Test Year Ending December 31, xxxx

(a) Line No	(b) Metric	(c) Source	(d) Historical Tot Amount	(e) Adjustment pg 1, Col (e)	(f) Adjusted Amount	(g) Allocation Factor Name	(h) Factor pg.1 Col (g) and (h)	(i) Allocated to FBR
1	OTIER							
2	LT Interest Expense	Pg.1, L15, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
3	Cash Received from G&T/lenders	WP1, Col (d), L71	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
4			<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>			<u>#DIV/0!</u>
5								
6	MDSC							
7	LT Interest Expense	L2	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
8	Depreciation Expense	Pg.1, L12, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
9	Non-Operating Margins - Interest	WP1, L70, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
10	Cash Patronage Capital*	L18	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
11	Resultant Amount	Sum (L7:L10)	<u>\$ -</u>		<u>\$ -</u>			<u>#DIV/0!</u>
12								
13	*Calculate Pat. Cap. (Cash):							
14	Inv. in Assoc. Org. - Patr. Capital - Current Yr.	WP1, L67, Col (d)	\$ -					
15	Inv. in Assoc. Org. - Patr. Capital - Prior Yr.	WP1, L67, Col (c)	\$ -					
16	Generation & Transmission Capital Credits	WP1, L68, Col (d)	\$ -					
17	Other Capital Cr. and Patronage Dividends	WP1, L69, Col (d)	<u>\$ -</u>					
18	Resultant Amount	L15 + L16 + L17 - L14	<u>\$ -</u>					

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 5 - Summary of Local Access Billing Demands (kW)
For the Historical Test Year Ending December 31, xxxx

<u>Line</u>	<u>Description</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Total</u>	
1	Total Local Access System ¹	-	-	-	-	-	-	-	-	-	-	-	-	-	
2	CP Date														
3	CP Time (hour Ending)														
4															
5	Wholesale Customers @ Del. Pt.														
6		-	-	-	-	-	-	-	-	-	-	-	-	-	
7		-	-	-	-	-	-	-	-	-	-	-	-	-	
8		-	-	-	-	-	-	-	-	-	-	-	-	-	
9		-	-	-	-	-	-	-	-	-	-	-	-	-	
10		-	-	-	-	-	-	-	-	-	-	-	-	-	
11		-	-	-	-	-	-	-	-	-	-	-	-	-	
12		-	-	-	-	-	-	-	-	-	-	-	-	-	
13		-	-	-	-	-	-	-	-	-	-	-	-	-	
14		-	-	-	-	-	-	-	-	-	-	-	-	-	
15		-	-	-	-	-	-	-	-	-	-	-	-	-	
16		-	-	-	-	-	-	-	-	-	-	-	-	-	
17		-	-	-	-	-	-	-	-	-	-	-	-	-	
18		-	-	-	-	-	-	-	-	-	-	-	-	-	
19		-	-	-	-	-	-	-	-	-	-	-	-	-	
20		-	-	-	-	-	-	-	-	-	-	-	-	-	
21	Subtotal	-	-	-	-	-	-	-	-	-	-	-	-	-	Wholesale
22	Losses @ 0.00% of 34.5 kV Output	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Subtotal with Losses (@ Source)	-	-	-	-	-	-	-	-	-	-	-	-	-	
24															
25	Prairie Land Retail														
26	Retail with Losses (@ Source)	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Losses @ 0.00% of 34.5 kV Input	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Retail @ Delivery Point	-	-	-	-	-	-	-	-	-	-	-	-	-	Retail
29															
30	Total Load (wholesale at source before loss + retail @ delivery pt.)													-	Wholesale + Retail

¹ With "behind the meter" generation added back in.

[illegible]

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6b - Detail of Exclusions
For the Historical Test Year Ending December 31, xxxx

Account	Description	Date	Vendor	Reference	Amount	Percent Excluded	Adjustment
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Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Revenue Requirement and Rate Calculation
For the Historical Test Year Ending December 31, xxxx

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
Line			Unadjusted		Adjusted			FBR
No	Description	Source	Historical	Adjustments	Historical	Allocation Factor		Revenue
			Test Year	No. Amount	Test Year	Name Factor		Requirement
			[xxxx]		[xxxx]			
				Source: WP2		Source: WP3		
1	Operating Expenses							
2	Power Production Expense	WP1, L29, Col (d)	-		\$ -		0.000000 \$	-
3	Cost of Purchased Power	WP1, L30, Col (d)	\$ -		\$ -		0.000000 \$	-
4	Transmission O&M	WP1, L31, Col (d)	\$ -		\$ -		1.000000 \$	-
5	Distribution Expense-Operation	WP1, L32, Col (d)	\$ -	[1] \$ -	\$ -	DOM	#DIV/0!	#DIV/0!
6	Distribution Expense-Maintenance	WP1, L33, Col (d)	\$ -	[2] \$ -	\$ -	DOM	#DIV/0!	#DIV/0!
7	Consumer Accounts Expense	WP1, L34, Col (d)	\$ -		\$ -		0.000000 \$	-
8	Customer Service and Informational Expense	WP1, L35, Col (d)	\$ -		\$ -		0.000000 \$	-
9	Sales Expense	WP1, L36, Col (d)	\$ -		\$ -		0.000000 \$	-
10	Administration & General	WP1, L37, Col (d)	\$ -	[3] \$ -	\$ -	LAB	#DIV/0!	#DIV/0!
11	Total O&M Expense	Sum (L2:L10)						#DIV/0!
12	Depreciation and Amortization	WP1, L38, Col (d)	\$ -	[4] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
13	Property Tax	WP1, L43, Col (d)	\$ -		\$ -	NP	#DIV/0!	#DIV/0!
14	Other Taxes	WP1, L44, Col (d)	\$ -		\$ -	NP	#DIV/0!	#DIV/0!
15	L.T. Interest	WP1, L45, Col (d)	\$ -	[5] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
16	Interest Charged to Construction - Credit	WP1, L46, Col (d)	\$ -	[6] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
17	Interest-Other	WP1, L47, Col (d)	\$ -	[7] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
18	Other Deductions	WP1, L48, Col (d)	\$ -	[8] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
19	Total Cost of Electric Service							#DIV/0!
20								
21	Margin Requirement							
22	Principal Payments	WP1, L62, Col (d)	\$ -	[9] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
23	L.T. Interest	L15	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
24	Subtotal	Sum (L22:23)						#DIV/0! #DIV/0!
25	Required Coverage Ratio	WP1, L64, Col (d)					1.80	1.80
26	Gross Margin Requirements	L24 x L25					#DIV/0!	#DIV/0!
27	Less: Offsets to Margin Requirements	WP4, L4 or L11, Col (i)					#DIV/0!	#DIV/0!
28	Net Margin Requirement	L26 - L27					#DIV/0!	#DIV/0!
29								
30	Total Revenue Requirements							
31	Using the greater of OTIER or MDSC Margin Requirements	L19 + L28						#DIV/0!
32	Divided By Total (Retail and Wholesale) Billing Demand	WP5, L25, Col (Total)						0 kW
33	Resultant Unit Rate	L31 / L32						#DIV/0!

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 1 - Input Data
For the Historical Test Year Ending December 31, xxxx

Line No	Description	Source	(b)	(c)	Amount	(d)	(e)	Notes	(f)
1	A. Net Plant in Service								
2									
3	1. Facilities Used to Provide Local Access Delivery Service								
4	Transmission Facilities								
5	350 Land and Land Rights	Trial Balance	\$	-					
6	352 Structures and Improvements	Trial Balance	\$	-					
7	353 Station Equipment	Trial Balance	\$	-					
8	355 Poles and Fixtures	Trial Balance	\$	-					
9	356 O.H. Conductors and Devices	Trial Balance	\$	-					
10	358 U.G. Conductors and Devices	Trial Balance	\$	-					
11	Subtotal	Sum(L5:L10)	\$	-	\$	-		GL acct 108.5	
12	Distribution Facilities (If Applicable)								
13	360 Land and Land Rights	Company Direct Assessment			N/A		N/A		
14	361 Structures and Improvements	Company Direct Assessment			N/A		N/A		
15	362 Station Equipment	Company Direct Assessment			N/A		N/A		
16	Subtotal	L13 + L15	\$	-	\$	-			
17	Total	L11 + L16	\$	-	\$	-			
18									
19	2. All Facilities								
20	301-301 Intangible Plant	Trial Balance		-		-			
21	350-359 Transmission Plant	Trial Balance	\$	-	\$	-		GL acct 108.5	
22	360-373 Distribution Plant	Trial Balance	\$	-	\$	-		GL acct. 108.6,108.61	
23	389-399 General Plant	Trial Balance	\$	-	\$	-		GL acct. 108.7-108.78	
24	Total		\$	-	\$	-			
25									
26									
27									
28	B. Operating Expenses								
29	Power Production Expense	Statement of Operations	\$	-					
30	Cost of Purchased Power	Statement of Operations	\$	-					
31	Transmission O&M	Statement of Operations	\$	-					
32	Distribution Expense-Operation	Statement of Operations	\$	-					
33	Distribution Expense-Maintenance	Statement of Operations	\$	-					
34	Consumer Accounts Expense	Statement of Operations	\$	-					
35	Customer Service and Informational Expense	Statement of Operations	\$	-					
36	Sales Expense	Statement of Operations	\$	-					
37	Administrative and General	Statement of Operations	\$	-					
38	Depreciation and Amortization	Statement of Operations	\$	-	\$	-			
39	Depreciation Expense - Distribution	Trial Balance	\$	-					
40	Depreciation Expense - Transmission	Trial Balance	\$	-					
41	Depreciation Expense - General Plant	Trial Balance	\$	-					
42	Amortization of AP (booked within Depreciation Expense)	Trial Balance	\$	-					
43	Property Tax	Statement of Operations	\$	-					
44	Other Taxes	Statement of Operations	\$	-					
45	L.T. Interest	Statement of Operations	\$	-	\$	-			
46	Interest Charged to Construction - Credit	Statement of Operations	\$	-	\$	-			
47	Interest-Other	Statement of Operations	\$	-	\$	-			
48	Other Deductions	Statement of Operations	\$	-					
49									
50	C. Payroll								
51	Transmission	Payroll Journal (Labor Amt)	\$	-				Part of GL acct	
52	Distribution	Payroll Journal (Labor Amt)	\$	-				560-573	
53	Customer Accounting	Payroll Journal (Labor Amt)	\$	-				580-598	
54	Customer Service and Information	Payroll Journal (Labor Amt)	\$	-				901-905	
55	Sales	Payroll Journal (Labor Amt)	\$	-				907-910	
56	Administration and General	Payroll Journal (Labor Amt)	\$	-				911-916	
57	Total	Payroll Journal (Labor Amt)	\$	-				920-932	
58			\$	-				Non-capitalized items	
59									
60	D. Miscellaneous								
61	1. Debt Service								
62	Principal Payments	Supplementary Company Records	\$	-	\$	-		Source/Notes	
63									
64	2. Target OTIER/MDSC	As approved by Commission			1.80			Proposed value in this year's filing	
65									
66	3. Margin Requirement Offsets								
67	Investment in Associate Organizations - Patronage Capital	Balance Sheet	\$	-	\$	-			
68	Generation & Transmission Capital Credits	Statement of Operations	\$	-					
69	Other Capital Credits and Patronage Dividends	Statement of Operations	\$	-					
70	Non-Operating Margins - Interest	Statement of Operations	\$	-					
71	Cash Received from G&T/Lenders	Supplementary Company Records	\$	-				Net for GL acct. 124.14	

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 2 - Adjustments To Historical Test Year Expenses
For the Historical Test Year Ending December 31, xxxx

<u>Line No</u>	<u>Type</u>	<u>Source</u>	<u>Amount</u>	<u>Notes</u>
1	1. Adjustment to Distribution Operations Expense per K.S.A. 66-101f(a), if any:			
2	Applicable Disallowance - Distribution Operations	WP6	\$ -	if applicable
3	Total Adjustment	L2	<u>\$ -</u>	
4				
5	2. Adjustment to Distribution Maintenance Expense per K.S.A. 66-101f(a), if any:			
6	Applicable Disallowance - Distribution Maintenance	WP6	\$ -	if applicable
7	Total Adjustment	L6	<u>\$ -</u>	
8				
9	3. Adjustment to Administrative & General per K.S.A. 66-101f(a), if any:			
10	Applicable Disallowance - A&G	WP6	\$ -	
11	Total Adjustment	L10	<u>\$ -</u>	
12				
13	4. Adjustment to Depreciation Expense			
14	Historical Amount	Pg.1, L12, Col (d)	\$ -	
15	Projected	WP1, L38, Col (e)	<u>\$ -</u>	
16	Subtotal Adjustment	L15 - L14	\$ -	
17	Less: Amortization of AP	WP1, L42, Col (d)	\$ -	amortization of AP is constant
18	Total Adjustment	L16 - L17	<u>\$ -</u>	
19				
20	5. Adjustment to LT Interest			
21	Historic Amount	Pg.1, L15, Col (d)	\$ -	
22	Projected Amount	WP1, L45, Col (e)	<u>\$ -</u>	
23	Total Adjustment	L22 - L21	<u>\$ -</u>	
24				
25	6. Adjustment to Interest Charged To Construction			
26	Historical Amount	Pg.1, L16, Col (d)	\$ -	
27	Projected Amount	WP1, L46, Col (e)	<u>\$ -</u>	
28	Total Adjustment	L27 - L26	<u>\$ -</u>	
29				
30	7. Adjustment to Interest-Other			
31	Historical Amount	Pg.1, L17, Col (d)	\$ -	
32	Projected Amount	WP1, L47, Col (e)	<u>\$ -</u>	
33	Total Adjustment	L32 - L31	<u>\$ -</u>	
34				
35	8. Adjustment to Other Deductions per K.S.A. 66-101f(a), if any:			
36	Applicable Disallowance - Other Deductions	WP6	\$ -	
37	Total Adjustment	L36	<u>\$ -</u>	
38				
39	9. Adjustment to Principal Payments			
40	Historical Amount	Pg.1, L22, Col (a)	\$ -	
41	Projected Amount	WP1, L62, Col (e)	<u>\$ -</u>	
42	Total Adjustment	L41 - L40	<u>\$ -</u>	

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 3 - Allocation Factors
For the Historical Test Year Ending December 31, xxxx

<u>Line No.</u>	<u>Description</u>	<u>Source</u>	<u>Allocator</u>	<u>Amount</u>
1	Distribution O&M Allocation Factor			
2	Distr. Plant used to provide Local Access Delivery Service	WP1, L16, Col (d)		\$ -
3	Total Distribution Plant	WP1, L22, Col (d)		\$ -
4				
5	Allocation Factor	L2 / L3	DOM	#DIV/0!
6				
7	Labor Allocation Factor			
8	Transmission Wages	WP1, L51, Col (d)		\$ -
9	Allocated Distribution Wages			
10	Total Distribution Wages	WP1, L52, Col (d)		\$ -
11	Allocation Factor	L5	DOM	#DIV/0!
12		L10 * L11		#DIV/0!
13	Total LAC Wages	L8 + L12		#DIV/0!
14				
15	Total Wages Other than A&G			
16	Total Wages	WP1, L57, Col (d)		\$ -
17	Less: Administration & General Wages	WP1, L56, Col (d)		-
18		L16 - L17		\$ -
19				
20	Transmission Labor Allocator	L13 / L18	LAB	#DIV/0!
21				
22	Net Plant Allocation Factor			
23	Plant-in-Service			
24	Transmission	WP1, L11, Col (d)		\$ -
25	Distr. used to provide Local Access Service	L2		\$ -
26	General Plant			
27	Total General Plant	WP1, L23, Col (d)		\$ -
28	Allocation Factor	L20	LAB	#DIV/0!
29		L27 * L28		#DIV/0!
30	Total LAC Plant-in-Service	L24 + L25 + L29		#DIV/0!
31				
32	Accumulated Reserves for Depreciation			
33	Transmission	WP1, L11, Col (e)		\$ -
34	Distribution Used in LAC	WP1, L16, Col (e)		\$ -
35	Allocated General Plant			
36	Total General Plant	WP1, L23, Col (e)		\$ -
37	Allocation Factor	L20	LAB	#DIV/0!
38		L36 * L37		#DIV/0!
39	Total LAC Accum. Depr. Res.	L33 + L34 + L38		#DIV/0!
40				
41	Net Plant Used in LAC	L30 - L39		#DIV/0!
42				
43	Total Plant in Service	WP1, L24, Col (e)		\$ -
44	Less: Total Accum. Reserves for Depr.	WP1, L24, Col (e)		\$ -
45	Total Net Plant	L43 - L44		\$ -
46				
47	Transmission Net Plant Allocator	L41 / L45	NP	#DIV/0!

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 4 - Margin Requirement Offsets
For the Historical Test Year Ending December 31, xxxx

(a) Line No	(b) Metric	(c) Source	(d) Historical Tot Amount	(e) Adjustment pg 1, Col (e)	(f) Adjusted Amount	(g) Allocation Name	(h) Factor	(i) Allocated to FBR
						pg.1 Col (g) and (h)		
1	OTIER							
2	LT Interest Expense	Pg.1, L15, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
3	Cash Received from G&T/lenders	WP1, Col (d), L71	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
4			<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>			<u>#DIV/0!</u>
5								
6	MDSC							
7	LT Interest Expense	L2	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
8	Depreciation Expense	Pg.1, L12, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
9	Non-Operating Margins - Interest	WP1, L70, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
10	Cash Patronage Capital*	L18	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
11	Resultant Amount	Sum (L7:L10)	<u>\$ -</u>		<u>\$ -</u>			<u>#DIV/0!</u>
12								
13	*Calculate Pat. Cap. (Cash):							
14	Inv. in Assoc. Org. - Patr. Capital - Current Yr.	WP1, L67, Col (d)	\$ -					
15	Inv. in Assoc. Org. - Patr. Capital - Prior Yr.	WP1, L67, Col (c)	\$ -					
16	Generation & Transmission Capital Credits	WP1, L68, Col (d)	\$ -					
17	Other Capital Cr. and Patronage Dividends	WP1, L69, Col (d)	<u>\$ -</u>					
18	Resultant Amount	L15 + L16 + L17 - L14	<u>\$ -</u>					

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 5 - Billing Demand
For the Historical Test Year Ending December 31, xxxx

<u>Line</u>	<u>Description</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Total</u>
1	Total Local Access System	-	-	-	-	-	-	-	-	-	-	-	-	-
2	CP Date	-	-	-	-	-	-	-	-	-	-	-	-	-
3	CP Time (hour Ending)	-	-	-	-	-	-	-	-	-	-	-	-	-
4														
5	Wholesale Customers @ Del. Pt.													
6		-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-
10	Subtotal	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Losses @ 0.00% of 34.5 kV Output	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Subtotal with Losses (@ Source)	-	-	-	-	-	-	-	-	-	-	-	-	-
13														
14	Victory Retail													
15	Retail with Losses (@ Source)	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Losses @ 0.00% of 34.5 kV Input	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Retail @ Delivery Point	-	-	-	-	-	-	-	-	-	-	-	-	-
18														
19														
20														
21														
22														
23														
24														
25	Total Load (wholesale at source before loss + retail @ delivery pt.)													-

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6a - Summary of Exclusions
For the Historical Test Year Ending December 31, xxxx

<u>Acct</u>	<u>Excluded</u> <u>Amount</u>
\$	-
\$	-
\$	-

[illegible]

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Revenue Requirement and Rate Calculation
For the Historical Test Year Ending December 31, xxxx

(a)	(b)	(c)	(d)	(e)		(f)	(g)	(h)	(i)
Line	Description	Source	Unadjusted Historical Test Year [xxxx]	Adjustments		Adjusted Historical Test Year [xxxx]	Allocation Factor		FBR Revenue Requirement
No				No.	Amount		Name	Factor	
				Source: WP2			Source: WP3		
1	Operating Expenses								
2	Power Production Expense	WP1, L29, Col (d)	-			\$ -		0.000000	\$ -
3	Cost of Purchased Power	WP1, L30, Col (d)	\$ -			\$ -		0.000000	\$ -
4	Transmission O&M	WP1, L31, Col (d)	\$ -			\$ -		1.000000	\$ -
5	Distribution Expense-Operation	WP1, L32, Col (d)	\$ -	[1]	\$ -	\$ -	DOM	#DIV/0!	#DIV/0!
6	Distribution Expense-Maintenance	WP1, L33, Col (d)	\$ -	[2]	\$ -	\$ -	DOM	#DIV/0!	#DIV/0!
7	Consumer Accounts Expense	WP1, L34, Col (d)	\$ -			\$ -		0.000000	\$ -
8	Customer Service and Informational Expense	WP1, L35, Col (d)	\$ -			\$ -		0.000000	\$ -
9	Sales Expense	WP1, L36, Col (d)	\$ -			\$ -		0.000000	\$ -
10	Administration & General	WP1, L37, Col (d)	\$ -	[3]	\$ -	\$ -	LAB	#DIV/0!	#DIV/0!
11	Total O&M Expense	Sum (L2:L10)							#DIV/0!
12	Depreciation and Amortization	WP1, L38, Col (d)	\$ -	[4]	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
13	Property Tax	WP1, L43, Col (d)	\$ -			\$ -	NP	#DIV/0!	#DIV/0!
14	Other Taxes	WP1, L44, Col (d)	\$ -			\$ -	NP	#DIV/0!	#DIV/0!
15	L.T. Interest	WP1, L45, Col (d)	\$ -	[5]	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
16	Interest Charged to Construction - Credit	WP1, L46, Col (d)	\$ -	[6]	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
17	Interest-Other	WP1, L47, Col (d)	\$ -	[7]	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
18	Other Deductions	WP1, L48, Col (d)	\$ -	[8]	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
19	Total Cost of Electric Service								#DIV/0!
20									
21	Margin Requirement								
22	Principal Payments	WP1, L62, Col (d)	\$ -	[9]	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
23	L.T. Interest	L15	\$ -		\$ -	\$ -	NP	#DIV/0!	#DIV/0!
24	Subtotal	Sum (L22:L23)							#DIV/0! #DIV/0!
25	Required Coverage Ratio	WP1, L64, Col (d)							1.80 1.80
26	Gross Margin Requirements	L24 x L25							#DIV/0! #DIV/0!
27	Less: Offsets to Margin Requirements	WP4, L4 or L11, Col (i)							#DIV/0! #DIV/0!
28	Net Margin Requirement	L26 - L27							#DIV/0! #DIV/0!
29									
30	Total Revenue Requirements								
31	Using the greater of OTIER or MDSC Margin Requirements	L19 + L28							#DIV/0!
32	Divided By Total (Retail and Wholesale) Billing Demand	WP5, L30, Col (Total)							0 kW
33	Resultant Unit Rate	L31 / L32							#DIV/0!

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 1 - Input Data
For the Historical Test Year Ending December 31, xxxx

Line No	Description	Source	(b)	(c)	Amount	(d)	(e)	Notes	(f)
1	A. Net Plant in Service								
2									
3	1. Facilities Used to Provide Local Access Delivery Service								
4	Transmission Facilities								
5	350 Land and Land Rights	Trial Balance	\$	-					
6	352 Structures and Improvements	Trial Balance	\$	-					
7	353 Station Equipment	Trial Balance	\$	-					
8	355 Poles and Fixtures	Trial Balance	\$	-					
9	356 O.H. Conductors and Devices	Trial Balance	\$	-					
10	358 U.G. Conductors and Devices	Trial Balance	\$	-					
11	Subtotal	Sum(L5:L10)	\$	-	\$	-		GL acct 108.5	
12	Distribution Facilities (If Applicable)								
13	360 Land and Land Rights	Company Direct Assessment			N/A		N/A		
14	361 Structures and Improvements	Company Direct Assessment			N/A		N/A		
15	362 Station Equipment	Company Direct Assessment			N/A		N/A		
16	Subtotal	L13 + L15	\$	-	\$	-			
17	Total	L11 + L16	\$	-	\$	-			
18									
19	2. All Facilities								
20	301-301 Intangible Plant	Trial Balance		-		-			
21	350-359 Transmission Plant	Trial Balance	\$	-	\$	-		GL acct 108.5	
22	360-373 Distribution Plant	Trial Balance	\$	-	\$	-		GL acct. 108.6,108.61	
23	389-399 General Plant	Trial Balance	\$	-	\$	-		GL acct. 108.7-108.78	
24	Total		\$	-	\$	-			
25									
26									
27									
28	B. Operating Expenses								
29	Power Production Expense	Statement of Operations	\$	-					
30	Cost of Purchased Power	Statement of Operations	\$	-					
31	Transmission O&M	Statement of Operations	\$	-					
32	Distribution Expense-Operation	Statement of Operations	\$	-					
33	Distribution Expense-Maintenance	Statement of Operations	\$	-					
34	Consumer Accounts Expense	Statement of Operations	\$	-					
35	Customer Service and Informational Expense	Statement of Operations	\$	-					
36	Sales Expense	Statement of Operations	\$	-					
37	Administrative and General	Statement of Operations	\$	-					
38	Depreciation and Amortization	Statement of Operations	\$	-	\$	-			
39	Depreciation Expense - Distribution	Trial Balance	\$	-					
40	Depreciation Expense - Transmission	Trial Balance	\$	-					
41	Depreciation Expense - General Plant	Trial Balance	\$	-					
42	Amortization of AP (booked within Depreciation Expense)	Trial Balance	\$	-					
43	Property Tax	Statement of Operations	\$	-					
44	Other Taxes	Statement of Operations	\$	-					
45	L.T. Interest	Statement of Operations	\$	-	\$	-			
46	Interest Charged to Construction - Credit	Statement of Operations	\$	-	\$	-			
47	Interest-Other	Statement of Operations	\$	-	\$	-			
48	Other Deductions	Statement of Operations	\$	-					
49									
50	C. Payroll								
51	Transmission	Payroll Journal (Labor Amt)	\$	-				Part of GL acct	
52	Distribution	Payroll Journal (Labor Amt)	\$	-				560-573	
53	Customer Accounting	Payroll Journal (Labor Amt)	\$	-				580-598	
54	Customer Service and Information	Payroll Journal (Labor Amt)	\$	-				901-905	
55	Sales	Payroll Journal (Labor Amt)	\$	-				907-910	
56	Administration and General	Payroll Journal (Labor Amt)	\$	-				911-916	
57	Total	Payroll Journal (Labor Amt)	\$	-				920-932	
58			\$	-				Non-capitalized items	
59									
60	D. Miscellaneous								
61	1. Debt Service								
62	Principal Payments	Supplementary Company Records	\$	-	\$	-		Source/Notes	
63									
64	2. Target OTIER/MDSC	As approved by Commission			1.80			Proposed value in this year's filing	
65									
66	3. Margin Requirement Offsets								
67	Investment in Associate Organizations - Patronage Capital	Balance Sheet	\$	-	\$	-			
68	Generation & Transmission Capital Credits	Statement of Operations	\$	-					
69	Other Capital Credits and Patronage Dividends	Statement of Operations	\$	-					
70	Non-Operating Margins - Interest	Statement of Operations	\$	-					
71	Cash Received from G&T/Lenders	Supplementary Company Records	\$	-				Net for GL acct. 124.14	

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 2 - Adjustments To Historical Test Year Expenses
For the Historical Test Year Ending December 31, xxxx

<u>Line No</u>	<u>Type</u>	<u>Source</u>	<u>Amount</u>	<u>Notes</u>
1	1. Adjustment to Distribution Operations Expense per K.S.A. 66-101f(a), if any:			
2	Applicable Disallowance - Distribution Operations	WP6	\$ -	if applicable
3	Total Adjustment	L2	<u>\$ -</u>	
4				
5	2. Adjustment to Distribution Maintenance Expense per K.S.A. 66-101f(a), if any:			
6	Applicable Disallowance - Distribution Maintenance	WP6	\$ -	if applicable
7	Total Adjustment	L6	<u>\$ -</u>	
8				
9	3. Adjustment to Administrative & General per K.S.A. 66-101f(a), if any:			
10	Applicable Disallowance - A&G	WP6	\$ -	
11	Total Adjustment	L10	<u>\$ -</u>	
12				
13	4. Adjustment to Depreciation Expense			
14	Historical Amount	Pg.1, L12, Col (d)	\$ -	
15	Projected	WP1, L38, Col (e)	<u>\$ -</u>	
16	Subtotal Adjustment	L15 - L14	\$ -	
17	Less: Amortization of AP	WP1, L42, Col (d)	\$ -	amortization of AP is constant
18	Total Adjustment	L16 - L17	<u>\$ -</u>	
19				
20	5. Adjustment to LT Interest			
21	Historic Amount	Pg.1, L15, Col (d)	\$ -	
22	Projected Amount	WP1, L45, Col (e)	<u>\$ -</u>	
23	Total Adjustment	L22 - L21	<u>\$ -</u>	
24				
25	6. Adjustment to Interest Charged To Construction			
26	Historical Amount	Pg.1, L16, Col (d)	\$ -	
27	Projected Amount	WP1, L46, Col (e)	<u>\$ -</u>	
28	Total Adjustment	L27 - L26	<u>\$ -</u>	
29				
30	7. Adjustment to Interest-Other			
31	Historical Amount	Pg.1, L17, Col (d)	\$ -	
32	Projected Amount	WP1, L47, Col (e)	<u>\$ -</u>	
33	Total Adjustment	L32 - L31	<u>\$ -</u>	
34				
35	8. Adjustment to Other Deductions per K.S.A. 66-101f(a), if any:			
36	Applicable Disallowance - Other Deductions	WP6	\$ -	
37	Total Adjustment	L36	<u>\$ -</u>	
38				
39	9. Adjustment to Principal Payments			
40	Historical Amount	Pg.1, L22, Col (a)	\$ -	
41	Projected Amount	WP1, L62, Col (e)	<u>\$ -</u>	
42	Total Adjustment	L41 - L40	<u>\$ -</u>	

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 3 - Allocation Factors
For the Historical Test Year Ending December 31, xxxx

<u>Line No.</u>	<u>Description</u>	<u>Source</u>	<u>Allocator</u>	<u>Amount</u>
1	Distribution O&M Allocation Factor			
2	Distr. Plant used to provide Local Access Delivery Service	WP1, L16, Col (d)		\$ -
3	Total Distribution Plant	WP1, L22, Col (d)		\$ -
4				
5	Allocation Factor	L2 / L3	DOM	#DIV/0!
6				
7	Labor Allocation Factor			
8	Transmission Wages	WP1, L51, Col (d)		\$ -
9	Allocated Distribution Wages			
10	Total Distribution Wages	WP1, L52, Col (d)		\$ -
11	Allocation Factor	L5	DOM	#DIV/0!
12		L10 * L11		#DIV/0!
13	Total LAC Wages	L8 + L12		#DIV/0!
14				
15	Total Wages Other than A&G			
16	Total Wages	WP1, L57, Col (d)		\$ -
17	Less: Administration & General Wages	WP1, L56, Col (d)		-
18		L16 - L17		\$ -
19				
20	Transmission Labor Allocator	L13 / L18	LAB	#DIV/0!
21				
22	Net Plant Allocation Factor			
23	Plant-in-Service			
24	Transmission	WP1, L11, Col (d)		\$ -
25	Distr. used to provide Local Access Service	L2		\$ -
26	General Plant			
27	Total General Plant	WP1, L23, Col (d)		\$ -
28	Allocation Factor	L20	LAB	#DIV/0!
29		L27 * L28		#DIV/0!
30	Total LAC Plant-in-Service	L24 + L25 + L29		#DIV/0!
31				
32	Accumulated Reserves for Depreciation			
33	Transmission	WP1, L11, Col (e)		\$ -
34	Distribution Used in LAC	WP1, L16, Col (e)		\$ -
35	Allocated General Plant			
36	Total General Plant	WP1, L23, Col (e)		\$ -
37	Allocation Factor	L20	LAB	#DIV/0!
38		L36 * L37		#DIV/0!
39	Total LAC Accum. Depr. Res.	L33 + L34 + L38		#DIV/0!
40				
41	Net Plant Used in LAC	L30 - L39		#DIV/0!
42				
43	Total Plant in Service	WP1, L24, Col (e)		\$ -
44	Less: Total Accum. Reserves for Depr.	WP1, L24, Col (e)		\$ -
45	Total Net Plant	L43 - L44		\$ -
46				
47	Transmission Net Plant Allocator	L41 / L45	NP	#DIV/0!

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 4 - Margin Requirement Offsets
For the Historical Test Year Ending December 31, xxxx

(a) Line No	(b) Metric	(c) Source	(d) Historical Tot Amount	(e) Adjustment pg 1, Col (e)	(f) Adjusted Amount	(g) Allocation Name pg.1 Col (g) and (h)	(h) Allocation Factor	(i) Allocated to FBR
1	OTIER							
2	LT Interest Expense	Pg.1, L15, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
3	Cash Received from G&T/lenders	WP1, Col (d), L71	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
4			<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>			<u>#DIV/0!</u>
5								
6	MDSC							
7	LT Interest Expense	L2	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
8	Depreciation Expense	Pg.1, L12, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
9	Non-Operating Margins - Interest	WP1, L70, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
10	Cash Patronage Capital*	L18	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
11	Resultant Amount	Sum (L7:L10)	<u>\$ -</u>		<u>\$ -</u>			<u>#DIV/0!</u>
12								
13	*Calculate Pat. Cap. (Cash):							
14	Inv. in Assoc. Org. - Patr. Capital - Current Yr.	WP1, L67, Col (d)	\$ -					
15	Inv. in Assoc. Org. - Patr. Capital - Prior Yr.	WP1, L67, Col (c)	\$ -					
16	Generation & Transmission Capital Credits	WP1, L68, Col (d)	\$ -					
17	Other Capital Cr. and Patronage Dividends	WP1, L69, Col (d)	<u>\$ -</u>					
18	Resultant Amount	L15 + L16 + L17 - L14	<u><u>\$ -</u></u>					

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 5 - Billing Demand
Historical Test Year Ending December 31, xxxx

<u>Line</u>	<u>Description</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Total</u>
1	Total Local Access System ¹	-	-	-	-	-	-	-	-	-	-	-	-	-
2	CP Date													
3	CP Time (hour Ending)													
4														
5	Wholesale Customers @ Del. Pt.													
6		-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-
12		-	-	-	-	-	-	-	-	-	-	-	-	-
13		-	-	-	-	-	-	-	-	-	-	-	-	-
14		-	-	-	-	-	-	-	-	-	-	-	-	-
15		-	-	-	-	-	-	-	-	-	-	-	-	-
16		-	-	-	-	-	-	-	-	-	-	-	-	-
17		-	-	-	-	-	-	-	-	-	-	-	-	-
18		-	-	-	-	-	-	-	-	-	-	-	-	-
19		-	-	-	-	-	-	-	-	-	-	-	-	-
20	Subtotal	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Losses @ 0.00% of 34.5 kV Output	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Subtotal with Losses (@ Source)	-	-	-	-	-	-	-	-	-	-	-	-	-
23														
24	Western Retail													
25	Retail with Losses (@ Source)	-	-	-	-	-	-	-	-	-	-	-	-	-
26	Losses @ 0.00% of 34.5 kV Input	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Retail @ Delivery Point	-	-	-	-	-	-	-	-	-	-	-	-	-
28														
29														
30	Total Load (wholesale at source before loss + retail @ delivery pt.)													-

¹ With "behind the meter" generation added back in.

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6a - Summary of Exclusions
For the Historical Test Year Ending December 31, xxxx

<u>Acct</u>	<u>Excluded Amount</u>
\$	-
\$	-
\$	-
\$	-
\$	-
\$	-
\$	-
\$	-
\$	-

Western Cooperative Electric Association, Inc.

Mid-Kansas Service Area

34.5kV Formula Based Rate

Work Paper 6b - Detail of Exclusions

For the Historical Test Year Ending December 31, xxxx[illegible]

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Revenue Requirement and Rate Calculation
For the Historical Test Year Ending December 31, xxxx

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
Line			Unadjusted		Adjusted			FBR
No	Description	Source	Historical Test Year [xxxx]	Adjustments No. Amount	Historical Test Year [xxxx]	Allocation Factor Name Factor		Revenue Requirement
				Source: WP2		Source: WP3		
1	Operating Expenses							
2	Power Production Expense	WP1, L29, Col (d)	\$ -		\$ -		0.000000	
3	Cost of Purchased Power	WP1, L30, Col (d)	\$ -		\$ -		0.000000	
4	Transmission O&M	WP1, L31, Col (d)	\$ -		\$ -		1.000000	\$ -
5	Distribution Expense-Operation	WP1, L32, Col (d)	\$ -	[1] \$ -	\$ -	DOM	#DIV/0!	#DIV/0!
6	Distribution Expense-Maintenance	WP1, L33, Col (d)	\$ -	[2] \$ -	\$ -	DOM	#DIV/0!	#DIV/0!
7	Consumer Accounts Expense	WP1, L34, Col (d)	\$ -		\$ -		0.000000	\$ -
8	Customer Service and Informational Expense	WP1, L35, Col (d)	\$ -		\$ -		0.000000	\$ -
9	Sales Expense	WP1, L36, Col (d)	\$ -		\$ -		0.000000	\$ -
10	Administration & General	WP1, L37, Col (d)	\$ -	[3] \$ -	\$ -	LAB	#DIV/0!	#DIV/0!
11	Total O&M Expense	Sum (L2:L10)						#DIV/0!
12	Depreciation and Amortization	WP1, L38, Col (d)	\$ -	[4] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
13	Property Tax	WP1, L40, Col (d)	\$ -		\$ -	NP	#DIV/0!	#DIV/0!
14	Other Taxes	WP1, L44, Col (d)	\$ -	[5] \$ -	\$ -		0.000000	\$ -
15	L.T. Interest	WP1, L45, Col (d)	\$ -	[6] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
16	Interest Charged to Construction - Credit	WP1, L46, Col (d)	\$ -	[7] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
17	Interest-Other	WP1, L47, Col (d)	\$ -	[8] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
18	Other Deductions	WP1, L48, Col (d)	\$ -	[9] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
19	Total Cost of Electric Service							#DIV/0!
20								
21	Margin Requirement							
22	Principal Payments	WP1, L62, Col (d)	\$ -	[10] \$ -	\$ -	NP	#DIV/0!	#DIV/0!
23	L.T. Interest	L15	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
24	Interest-Other	L16	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
25	Subtotal	Sum (L22:24)						#DIV/0!
26	Required Coverage Ratio	WP1, L65, Col (d)						1.75
27	Gross Margin Requirements	L25 x L26						#DIV/0!
28	Less: Offsets to Margin Requirements	WP4, L5, Col (i)						#DIV/0!
29	Net Margin Requirement	L27 - L28						#DIV/0!
30								
31	Total Revenue Requirements							
32	Add: Net Margin Requirement	L19 + L29						#DIV/0!
33	Divided By Total System Billing Demand	WP5, L28						0 kW
34	Unadjusted Unit Rate	L32 / L33						#DIV/0!
35	Less: Property Tax Surcharge	Dkt. No.						\$0.00/kW-mo.
36	Resultant Unit Rate	L34- L35						#DIV/0!

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Allocation of 34.5kV FBR Rate Adjustment to Retail Rate Classes
For the Historical Test Year Ending December 31, xxxx

I. Calculation of the 34.5kV FBR Retail Rate Adjustment

Line No.	Description	Source	Amount
1	Resultant LAC rate	Pg. 1, L36	#DIV/0! /kW/mo
2	Currently Effective LAC rate	Docket No.	\$ - /kW/mo
3	Difference	L2 - L3	#DIV/0! /kW/mo
4			
5	Additional Revenue Needed From Retail:		
6	Retail LAC Demand	WP5. L26, Col (Total)	\$ - kW
7	Additional Per kW LAC	L3	#DIV/0! /kW/mo
8			#DIV/0!

II. Proportional Allocation of 34.5kV FBR Retail Rate Adjustment to Rate Classes On Base Revenue by Rate Schedule

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
Line No.	Rate Schedule	Rate Schedule Revenue ¹	Allocated Power Supply Cost of Service ¹	Base Revenue ¹	Percent of Tot Base Rev	Allocation of Rate Adjustment				
						34.5kV FBR Adjustment ¹	Base Revenue	Check the Spread	Historical Energy Sales	34.5kV FBR Adjustment per kWh
		(\$)	(\$)	(\$)	(%)	(\$)	(\$)	(%)	(kWh)	(\$)
1	Residential Service (RS)									
2	General Use	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
3	Space Heating ²	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
4	General Service Small (GSS)	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
5	General Service Large (GSL)	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
6	General Service Space Heating ²	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
7	Industrial Service (IS)	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
8	Interruptible Industrial Service (INT)	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
9	Real -Time Pricing (RTP) ³	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
10	Sub-transmission Level Service STR) ⁴	\$ -	N.A.	N.A.	0.00%	#DIV/0!	-	#DIV/0!	0	#DIV/0!
11	Municipal Power Service (M-I)	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
12	Water Pumping Service (WP)	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
13	Irrigation Service (IP-I)	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
14	Temporary Service (CS)	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
15	Lighting	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	#DIV/0!
16	Total Retail Rates	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0	

¹ See Workpaper 7 for detail.

² The per kWh Adjustment shown in Column (k) constitutes annual average, with the actual seasonal components varying due to rate design. See Work Paper 7 for detail.

³ Exclude RTP (marginal piece/unadjustable rate). Note, however, that these customers will still share in the 34.5kV FBR adjustment per their corresponding baseline tariff.

⁴ STR customers will not share in retail 34.5kV FBR adjustment: 115 STR take service at a higher voltage level, and 34.5kV STR pay their share of 34.5 kV system costs in the LAC (demand) rate component.

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 1 - Input Data
Historical Test Year Ending December 31, xxxx

Line No	Description	Source	(c)	Amount	(e)	Notes
	(a)	(b)		(d)		(f)
1	A. Net Plant in Service			As of December 31, xxxx		
2				Plant in	Accum. Res.	
3	1. Facilities Used to Provide Local Access Delivery Service			Service	for Depr.	
4	Transmission Facilities					
5	350 Land and Land Rights	Trial Balance		\$ -		
6	352 Structures and Improvements	Trial Balance				
7	353 Station Equipment	Trial Balance		\$ -		
8	355 Poles and Fixtures	Trial Balance		\$ -		
9	356 O.H. Conductors and Devices	Trial Balance		\$ -		
10	358 U.G. Conductors and Devices	Trial Balance		\$ -		
11	Subtotal	Sum(L5:L10)		\$ -	\$ -	
12	Distribution Facilities (If Applicable)					
13	360 Land and Land Rights	Company Direct Assessment		N/A	N/A	
14	361 Structures and Improvements	Company Direct Assessment		N/A	N/A	
15	362 Station Equipment	Company Direct Assessment		N/A	N/A	
16	Subtotal	L13 + L15		-	-	
17	Total	Ln 11 + Ln 16		-	-	
18						
19	2. All Facilities					
20	301-301 Intangible Plant	Trial Balance		\$ -	\$ -	
21	350-359 Transmission Plant	Trial Balance		\$ -	\$ -	
22	360-373 Distribution Plant	Trial Balance		\$ -	\$ -	
23	389-399 General Plant	Trial Balance		\$ -	\$ -	
24	Total			\$ -	\$ -	
25						
26						
27						
28	B. Operating Expenses			Historical	Budget	
29	Power Production Expense	Statement of Operations		Test Year	Year	
30	Cost of Purchased Power	Statement of Operations		xxxx	xxxx+1	
31	Transmission O&M	Statement of Operations		\$ -		
32	Distribution Expense-Operation	Statement of Operations		\$ -		
33	Distribution Expense-Maintenance	Statement of Operations		\$ -		
34	Consumer Accounts Expense	Statement of Operations		\$ -		
35	Customer Service and Informational Expense	Statement of Operations		\$ -		
36	Sales Expense	Statement of Operations		\$ -		
37	Administrative and General	Statement of Operations		\$ -		
38	Depreciation and Amortization	Statement of Operations		\$ -	\$ -	
39	Depreciation Expense - Distribution	Trial Balance		\$ -		
40	Depreciation Expense - Transmission	Trial Balance		\$ -		
41	Depreciation Expense - General Plant	Trial Balance		\$ -		
42	Amortization of AP (booked within Depreciation Expense)	Trial Balance		\$ -		
43	Property Tax	Statement of Operations		\$ -		
44	Other Taxes	Statement of Operations		\$ -		
45	L.T. Interest	Statement of Operations		\$ -	\$ -	
46	Interest Charged to Construction - Credit	Statement of Operations		\$ -	\$ -	
47	Interest-Other	Statement of Operations		\$ -	\$ -	
48	Other Deductions	Statement of Operations		\$ -		
49						
50	C. Payroll					
51	Transmission	Payroll Journal (Labor Amt)		\$ -		
52	Distribution	Payroll Journal (Labor Amt)		\$ -		
53	Customer Accounting	Payroll Journal (Labor Amt)		\$ -		
54	Customer Service and Information	Payroll Journal (Labor Amt)		\$ -		
55	Sales	Payroll Journal (Labor Amt)		\$ -		
56	Administration and General	Payroll Journal (Labor Amt)		\$ -		
57	Total			\$ -		Non-capitalized items
58						
59						
60	D. Miscellaneous			Historical	Budget	
61	1. Debt Service			Test Year	Year	
62	Principal Payment	F7, Pt.O, Col. B		xxxx	xxxx+1	Source/Notes
63	Interest Expense	Ln 45 + Ln 47		\$ -	\$ -	
64						
65	2. Target MDSC	As approved by Commission		1.75		Same as DSC-FBR
66						
67	3. Margin Offsets					
68	Cash Capital Credits Received (from G&T/Lenders)	F7 or Supplementary Company Schedules		\$ -		
69	Non-cash Other Deductions (Amortizations)	Trial Balance		\$ -		
70						
71	3. Other					
72	Other Taxes - paid in cash	Trial Balance or Supplementary Company Schedules		\$ -		

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 2 - Adjustments To Historical Test Year Expenses
For the Historical Test Year Ending December 31, xxxx

<u>Line No</u>	<u>Type</u>	<u>Source</u>	<u>Amount</u>	<u>Notes</u>
1	1. Adjustment to Distribution Operations Expense per K.S.A. 66-101f(a), if any:			
2	Applicable Disallowance - Distribution Operations	WP6	\$ -	
3	Total Adjustment	L2	\$ -	
4				
5	2. Adjustment to Distribution Maintenance per K.S.A. 66-101f(a), if any:			
6	Applicable Disallowance - Distribution Maintenance	WP6	\$ -	
7	Total Adjustment	L6	\$ -	
8				
9	3. Adjustment to A&G per K.S.A. 66-101f(a), if any:			
10	Applicable Disallowance - A&G	WP6	\$ -	
11	Total Adjustment	L10	\$ -	
12				
13	4. Adjustment to Depreciation Expense			
14	Historical Amount	Pg.1, L12, Col (d)	\$ -	
15	Projected	WP1, L38, Col (e)	\$ -	
16	Subtotal Adjustment	L15 - L14	\$ -	
17	Less: Amortization of AP (if applicable)	WP1, L42, Col (d)	\$ -	
18	Total Adjustment	L16 - L17	\$ -	
19				
20	5. Adjustment to Other Taxes			
21	Historical Amount	Pg.1, L14, Col (d)	\$ -	
22	Paid in Cash	WP1, L72, Col (e)	\$ -	
23	Total Adjustment	L22 - L21	\$ -	
24				
25	6. Adjustment to LT Interest			
26	Historic Amount	Pg.1, L15, Col (d)	\$ -	
27	Projected	WP1, L45, Col (e)	\$ -	
28	Total Adjustment	L27 - L26	\$ -	
29				
30	7. Adjustment to Interest Charged To Construction			
31	Historical Amount	Pg.1, L16, Col (d)	\$ -	
32	Projected	WP1, L46, Col (e)	\$ -	
33	Total Adjustment	L32 - L31	\$ -	
34				
35	8. Adjustment to Interest-Other			
36	Historical Amount	Pg.1, L17, Col (a)	\$ -	
37	Projected	WP1, L47, Col (e)	\$ -	
38	Total Adjustment	L37 - L36	\$ -	
39				
40	9. Adjustment to Other Deductions per K.S.A. - 66-101f(a), if any:			
41	Applicable Disallowance - Other Deductions	WP6	\$ -	
42	Total Adjustment	L41	\$ -	
43				
44	10. Adjustment to Principal			
45	Historical Amount	Pg.1, L22, Col (d)	\$ -	
46	Projected Amount	WP1, L62, Col (e)	\$ -	
47	Total Adjustment	L46 - L45	\$ -	

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 3 - Allocation Factors
Historical Test Year Ending December 31, xxxx

Line No.	Description	Source	Allocator	Amount
1	Distribution O&M Allocation Factor			
2	Distr. Plant used to provide Local Access Delivery Service	WP1, L16, Col (d)		\$ -
3	Total Distribution Plant	WP1, L22, Col (d)		\$ -
4				
5	Allocation Factor	L2 / L3	DOM	#DIV/0!
6				
7	Labor Allocation Factor			
8	Transmission Wages	WP1, L51, Col (d)		\$ -
9	Allocated Distribution Wages			
10	Total Distribution Wages	WP1, L52, Col (d)		\$ -
11	Allocation Factor	L5	DOM	#DIV/0!
12		L10 * L11		#DIV/0!
13	Total LAC Wages	L8 + L12		#DIV/0!
14				
15	Total Wages Other than A&G			
16	Total Wages	WP1, L57, Col (d)		\$ -
17	Less: Administration & General Wages	WP1, L56, Col (d)		-
18		L16 - L17		\$ -
19				
20	Transmission Labor Allocator	L13 / L18	LAB	#DIV/0!
21				
22	Net Plant Allocation Factor			
23	Plant-in-Service			
24	Transmission	WP1, L11, Col (d)		\$ -
25	Distr. Plant Used to provide Local Access Delivery Service	L2		\$ -
26	General Plant			
27	Total General Plant	WP1, L23, Col (d)		\$ -
28	Allocation Factor	L20	LAB	#DIV/0!
29		L27 * L28		#DIV/0!
30	Total LAC Plant-in-Service	L24 + L25 + L29		#DIV/0!
31				
32	Accumulated Reserves for Depreciation			
33	Transmission	WP1, L11, Col (e)		\$ -
34	Distr. Plant Used to provide Local Access Delivery Service	WP1, L16, Col (e)		\$ -
35	Allocated General Plant			
36	Total General Plant	WP1, L23, Col (e)		\$ -
37	Allocation Factor	L20	LAB	#DIV/0!
38		L36 * L37		#DIV/0!
39	Total LAC Accum. Depr. Res.	L33 + L34 + L38		#DIV/0!
40				
41	Net Plant Used in LAC	L30 - L39		#DIV/0!
42				
43	Total Plant in Service	WP1, L24, Col (d)		\$ -
44	Less: Total Accum. Reserves for Depr.	WP1, L24, Col (e)		\$ -
45	Total Net Plant	L43 - L44		\$ -
46				
47	Transmission Net Plant Allocator	L41 / L45	NP	#DIV/0!

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 4 - Margin Requirement Offsets
For the Historical Test Year Ending December 31, xxxx

(a) Line No	(b) Item	(c) Source	(d) Historical Tot Amount	(e) Adjustment pg 1, Col (e)	(f) Adjusted Amount	(g) Allocation Factor Name	(h) Value	(i) Allocated to FBR
1	Interest Expense (LT Interest plus Interest-Other)	WP1, L63, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
2	Depreciation Expense	Pg.1, L0, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
3	Non-cash Other Deductions (Amortizations)	WP1, L69, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
4	Cash Capital Credits Received	WP1, L68, Col (d)	\$ -	\$ -	\$ -	NP	#DIV/0!	#DIV/0!
5	Resultant Amount	Sum (L7:L10)	\$ -		\$ -			#DIV/0!

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 5 - Summary of Local Access Billing Demands (kW)
For the Historical Test Year Ending December 31, xxxx

<u>Line</u>	<u>Description</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Total</u>
1	Total Local Access System	-	-	-	-	-	-	-	-	-	-	-	-	-
2	CP Date													
3	CP Time (hour Ending) CST													
4														
5	Wholesale Customers @ Del. Pt.													
6		-	-	-	-	-	-	-	-	-	-	-	-	-
7		-	-	-	-	-	-	-	-	-	-	-	-	-
8		-	-	-	-	-	-	-	-	-	-	-	-	-
9		-	-	-	-	-	-	-	-	-	-	-	-	-
10		-	-	-	-	-	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-	-	-	-	-	-
12		-	-	-	-	-	-	-	-	-	-	-	-	-
13		-	-	-	-	-	-	-	-	-	-	-	-	-
14		-	-	-	-	-	-	-	-	-	-	-	-	-
15		-	-	-	-	-	-	-	-	-	-	-	-	-
16		-	-	-	-	-	-	-	-	-	-	-	-	-
17		-	-	-	-	-	-	-	-	-	-	-	-	-
18		-	-	-	-	-	-	-	-	-	-	-	-	-
19	Subtotal--Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	
20	Losses @ 0.00% of 34.5 kV Output	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Subtotal with Losses (@ Source)	-	-	-	-	-	-	-	-	-	-	-	-	-
22														
23	Southern Pioneer Retail													
24	Retail with Losses (@ Source)	-	-	-	-	-	-	-	-	-	-	-	-	-
25	Losses @ 0.00% of 34.5 kV Input	-	-	-	-	-	-	-	-	-	-	-	-	-
26	Retail @ Delivery Point	-	-	-	-	-	-	-	-	-	-	-	-	-
27														
28	Total Load (Wholesale @ Source/before losses + Retail @ Delivery Point)													-

For the Historical Test Year Ending December 31, xxxx

Account	Description	Total Adjustment*

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 6a - Summary of Exclusions
For the Historical Test Year Ending December 31, xxxx

Account	Description	Date	Vendor	Reference	Total Amount	Percent Excluded	Total Adjustment*
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Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 7 - Proportional Allocation of 34.5kV FBR Retail Rate Adjustment to Rate Classes
For the Historical Test Year Ending December 31, xxxx

Exhibit 1-4
Page 10

(a)	(b)	(c)			(d)			(e)	(f)	(i)	(j)	(k)		
Line No.	Rate Schedule	Historical Revenue Rates ¹	Historical Energy Sales ¹	Power Costs Per kWh Sold from last COS	Base Power Costs Recovered in Rates	Historical ECA-2 Revenue By Rate ¹	Total Power Costs Recovered in Rates	Base Revenue by Rate		Allocation of Retail Rate Adjustment			Resultant Tot Rate Rev	% Chg on Tot Rev
		(\$)	(kWh)	(cents/kWh)	(\$)	(\$)	(\$)	(\$)	Percent	34.5kV FBR Adjustment	Adjusted Base Revenue by Rate	Percent		
1	Residential Service (RS)													
2	General Use	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
3	Space Heating	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
4	General Service Small (GSS)	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
5	General Service Large (GSL)	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
6	General Service Space Heating	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
7	Industrial Service (IS)	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
8	Interruptible Industrial Service (INT)	\$ -	-		\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0.0%
9	Real -Time Pricing (RTP) ²	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
10	Sub-transmission Level Service (STR) ³	\$ -	-	0.00	N.A.	N.A.	N.A.	N.A.	0.00%	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
11	Municipal Power Service (M-I)	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
12	Water Pumping Service (WP)	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
13	Irrigation Service (IP-I)	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
14	Temporary Service (CS)	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
15	Lighting	\$ -	-	0.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
16	Total Retail Rates	\$ -	-		\$ -	\$ -	\$ -	\$ -	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

¹ See Patronage Report for historical usage and revenues by rate class (Work Paper 8).

² Exclude RTP (marginal piece/unadjustable rate). Note, however, that these customers will still share in the 34.5kV FBR adjustment per their corresponding baseline tariff.

³ STR customers will not share in retail 34.5kV FBR adjustment: 115 STR take service at a higher voltage level, and 34.5kV STR pay their share of 34.5 kV system costs in the

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Usage and Revenues by Retail Class (from Southern Pioneer Patronage Report)
Work Paper 8 - Supporting Data for the Allocation of the 34.5kV FBR Rate Adjustment

kWh Totals by Retail Rate Class		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Res	Residential													-
Res	Residential Heating													-
Comm	Commercial Small													-
Comm	Commercial Large													-
Comm	Commercial Space Heating													-
Ind	Industrial													-
	Industrial Interruptible													-
Ind	Real Time Pricing													-
Ind	Industrial-Sub Trans 34.5													-
Ind	Industrial-Sub Trans 115													-
Irr	Irrigation													-
Comm	Commercial Municipal													-
WP	Water Pumping													-
Lights	Street Lighting													-
Temp	Temporary Service													-
Resale	Resale	-	-	-	-	-	-	-	-	-	-	-	-	-
Own Use	Own Use	-	-	-	-	-	-	-	-	-	-	-	-	-
		-	-	-	-	-	-	-	-	-	-	-	-	-
Revenue Totals by Retail Rate Class		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Res	Residential	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Res	Residential Heating	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Comm	Commercial Small	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Comm	Commercial Large	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Comm	Commercial Space Heating	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ind	Industrial	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Industrial Interruptible	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ind	Real Time Pricing	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ind	Industrial-Sub Trans 34.5	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ind	Industrial-Sub Trans 115	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Irr	Irrigation	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Comm	Commercial Municipal	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
WP	Water Pumping	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Lights	Street Lighting	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Temp	Temporary Service	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Resale	Resale	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Own Use	Own Use	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
PCA Totals by Retail Rate Class		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Res	Residential	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Res	Residential Heating	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Comm	Commercial Small	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Comm	Commercial Large	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Comm	Commercial Space Heating	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ind	Industrial	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Industrial Interruptible	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ind	Real Time Pricing	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ind	Industrial-Sub Trans 34.5	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ind	Industrial-Sub Trans 115	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Irr	Irrigation	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Comm	Commercial Municipal	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
WP	Water Pumping	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Lights	Street Lighting	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Temp	Temporary Service	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Resale	Resale	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Own Use	Own Use	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cons Totals by Retail Rate Class		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Avg Cons
Res	Residential													
Res	Residential Heating													
Comm	Commercial Small													
Comm	Commercial Large													
Comm	Commercial Space Heating													
Ind	Industrial													
	Industrial Interruptible													
Ind	Real Time Pricing													
Ind	Industrial-Sub Trans 34.5													
Ind	Industrial-Sub Trans 115													
Irr	Irrigation													
Comm	Commercial Municipal													
WP	Water Pumping													
Lights	Street Lighting													
Temp	Temporary Service													
Resale	Resale													
Own Use	Own Use													

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 9 - Calculating Lighting Rates
post 34.5kV FBR Adjustment

#DIV/0! per kWh Adjustment for Lighting -- from Part II on page 2

Private Area / Street Lighting (PAL-SL-I)

Private Area Light (Coop owned)

On Existing Pole				kWh Estimate		Resultant Rate
100 W P.A.L. Cust 0%	@	\$	-	/mo.	40	#DIV/0! /mo.
100 W P.A.L. Cust 100%	@	\$	-	/mo.	40	#DIV/0! /mo.
150 W P.A.L. Cust 0%	@	\$	-	/mo.	60	#DIV/0! /mo.
150 W P.A.L. Cust 100%	@	\$	-	/mo.	60	#DIV/0! /mo.
200 W P.A.L. Cust 0%	@	\$	-	/mo.	80	#DIV/0! /mo.
200 W P.A.L. Cust 50%	@	\$	-	/mo.	80	#DIV/0! /mo.
200 W P.A.L. Cust 100%	@	\$	-	/mo.	80	#DIV/0! /mo.
On New Pole (Wood)						
100 W P.A.L. Cust 0%	@	\$	-	/mo.	40	#DIV/0! /mo.
100 W P.A.L. Cust 100%	@	\$	-	/mo.	40	#DIV/0! /mo.
150 W P.A.L. Cust 0%	@	\$	-	/mo.	60	#DIV/0! /mo.
150 W P.A.L. Cust 100%	@	\$	-	/mo.	60	#DIV/0! /mo.
200 W P.A.L. Cust 0%	@	\$	-	/mo.	80	#DIV/0! /mo.
200 W P.A.L. Cust 100%	@	\$	-	/mo.	80	#DIV/0! /mo.

Flood Lights

On Existing Pole						
150 W Flood Cust 0%	@	\$	-	/mo.	60	#DIV/0! /mo.
150 W Flood Cust 100%	@	\$	-	/mo.	60	#DIV/0! /mo.
400 W Flood Cust 0%	@	\$	-	/mo.	160	#DIV/0! /mo.
400 W Flood Cust 50%	@	\$	-	/mo.	160	#DIV/0! /mo.
400 W Flood Cust 100%	@	\$	-	/mo.	160	#DIV/0! /mo.
1000 W Flood M.H. Cust 0%	@	\$	-	/mo.	402	#DIV/0! /mo.
1000 W Flood M.H. Cust 100%	@	\$	-	/mo.	402	#DIV/0! /mo.
On New Pole (Wood)						
150 W P.A.L. Cust 0%	@	\$	-	/mo.	60	#DIV/0! /mo.
150 W P.A.L. Cust 100%	@	\$	-	/mo.	60	#DIV/0! /mo.
400 W P.A.L. Cust 0%	@	\$	-	/mo.	160	#DIV/0! /mo.
400 W P.A.L. Cust 100%	@	\$	-	/mo.	160	#DIV/0! /mo.
1000 W Flood M.H. Cust 0%	@	\$	-	/mo.	402	#DIV/0! /mo.
1000 W Flood M.H. Cust 100%	@	\$	-	/mo.	402	#DIV/0! /mo.

Street Lights

On Existing Pole						
100 W P.A.L. Cust 0%	@	\$	-	/mo.	40	#DIV/0! /mo.
100 W P.A.L. Cust 100%	@	\$	-	/mo.	40	#DIV/0! /mo.
150 W P.A.L. Cust 0%	@	\$	-	/mo.	60	#DIV/0! /mo.
150 W P.A.L. Cust 100%	@	\$	-	/mo.	60	#DIV/0! /mo.
200 W P.A.L. Cust 0%	@	\$	-	/mo.	80	#DIV/0! /mo.
200 W P.A.L. Cust 100%	@	\$	-	/mo.	80	#DIV/0! /mo.
On New Pole (Wood)						
100 W P.A.L. Cust 0%	@	\$	-	/mo.	40	#DIV/0! /mo.
100 W P.A.L. Cust 100%	@	\$	-	/mo.	40	#DIV/0! /mo.
150 W P.A.L. Cust 0%	@	\$	-	/mo.	60	#DIV/0! /mo.
150 W P.A.L. Cust 100%	@	\$	-	/mo.	60	#DIV/0! /mo.
200 W P.A.L. Cust 0%	@	\$	-	/mo.	80	#DIV/0! /mo.
200 W P.A.L. Cust 100%	@	\$	-	/mo.	80	#DIV/0! /mo.
On Existing Pole				Estimate		
100 W Cobra Head Cust 0%	@	\$	-	/mo.	40	#DIV/0! /mo.
100 W Cobra Head Cust 100%	@	\$	-	/mo.	40	#DIV/0! /mo.
150 W Cobra Head Cust 0%	@	\$	-	/mo.	60	#DIV/0! /mo.
150 W Cobra Head Cust 100%	@	\$	-	/mo.	60	#DIV/0! /mo.
200 W Cobra Head Cust 0%	@	\$	-	/mo.	80	#DIV/0! /mo.
200 W Cobra Head Cust 100%	@	\$	-	/mo.	80	#DIV/0! /mo.
250 W Cobra Head Cust 0%	@	\$	-	/mo.	100	#DIV/0! /mo.
250 W Cobra Head Cust 100%	@	\$	-	/mo.	100	#DIV/0! /mo.
400 W Cobra Head Cust 0%	@	\$	-	/mo.	160	#DIV/0! /mo.
400 W Cobra Head Cust 100%	@	\$	-	/mo.	160	#DIV/0! /mo.
On New Pole (Wood)						
100 W Cobra Head Cust 0%	@	\$	-	/mo.	40	#DIV/0! /mo.
100 W Cobra Head Cust 100%	@	\$	-	/mo.	40	#DIV/0! /mo.
150 W Cobra Head Cust 0%	@	\$	-	/mo.	60	#DIV/0! /mo.
150 W Cobra Head Cust 100%	@	\$	-	/mo.	60	#DIV/0! /mo.
200 W Cobra Head Cust 0%	@	\$	-	/mo.	80	#DIV/0! /mo.
200 W Cobra Head Cust 100%	@	\$	-	/mo.	80	#DIV/0! /mo.
250 W Cobra Head Cust 0%	@	\$	-	/mo.	100	#DIV/0! /mo.
250 W Cobra Head Cust 100%	@	\$	-	/mo.	100	#DIV/0! /mo.
400 W Cobra Head Cust 0%	@	\$	-	/mo.	160	#DIV/0! /mo.
400 W Cobra Head Cust 100%	@	\$	-	/mo.	160	#DIV/0! /mo.
On New Pole (Steel)						
100 W Cobra Head Cust 0%	@	\$	-	/mo.	40	#DIV/0! /mo.
100 W Cobra Head Cust 100%	@	\$	-	/mo.	40	#DIV/0! /mo.
150 W Cobra Head Cust 0%	@	\$	-	/mo.	60	#DIV/0! /mo.
150 W Cobra Head Cust 100%	@	\$	-	/mo.	60	#DIV/0! /mo.
200 W Cobra Head Cust 0%	@	\$	-	/mo.	80	#DIV/0! /mo.
200 W Cobra Head Cust 100%	@	\$	-	/mo.	80	#DIV/0! /mo.
250 W Cobra Head Cust 0%	@	\$	-	/mo.	100	#DIV/0! /mo.
250 W Cobra Head Cust 100%	@	\$	-	/mo.	100	#DIV/0! /mo.
400 W Cobra Head Cust 0%	@	\$	-	/mo.	160	#DIV/0! /mo.
400 W Cobra Head Cust 100%	@	\$	-	/mo.	160	#DIV/0! /mo.

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Calculating Lighting Rates (Continued)
post-34.5kV FBR Adjustment

#DIV/0! per kWh Adjustment for Lighting -- from Part II on page 2

Security (Decorative) Lighting Service (DOL-I)

Coop Owned

Acorn

			kWh estimate	Resultant Rate	
35 W HPS Cust 0%	@ \$ - /mo.	14	#DIV/0!	#DIV/0!	/mo.
35 W HPS Cust 100%	@ \$ - /mo.	14	#DIV/0!	#DIV/0!	/mo.
100 W HPS Cust 0%	@ \$ - /mo.	40	#DIV/0!	#DIV/0!	/mo.
100 W HPS Cust 50%	@ \$ - /mo.	40	#DIV/0!	#DIV/0!	/mo.
100 W HPS Cust 100%	@ \$ - /mo.	40	#DIV/0!	#DIV/0!	/mo.
250 W HPS Cust 0%	@ \$ - /mo.	100	#DIV/0!	#DIV/0!	/mo.
250 W HPS Cust 100%	@ \$ - /mo.	100	#DIV/0!	#DIV/0!	/mo.

Single Globe

35 W HPS Cust 0%	@ \$ - /mo.	14	#DIV/0!	#DIV/0!	/mo.
35 W HPS Cust 100%	@ \$ - /mo.	14	#DIV/0!	#DIV/0!	/mo.
70 W HPS Cust 0%	@ \$ - /mo.	28	#DIV/0!	#DIV/0!	/mo.
70 W HPS Cust 100%	@ \$ - /mo.	28	#DIV/0!	#DIV/0!	/mo.
100 W HPS Cust 0%	@ \$ - /mo.	40	#DIV/0!	#DIV/0!	/mo.
100 W HPS Cust 100%	@ \$ - /mo.	40	#DIV/0!	#DIV/0!	/mo.
150 W HPS Cust 0%	@ \$ - /mo.	60	#DIV/0!	#DIV/0!	/mo.
150 W HPS Cust 100%	@ \$ - /mo.	60	#DIV/0!	#DIV/0!	/mo.

Multi Globe

70 W HPS Cust 0%	@ \$ - /mo.	140	#DIV/0!	#DIV/0!	/mo.
70 W HPS Cust 100%	@ \$ - /mo.	140	#DIV/0!	#DIV/0!	/mo.
100 W HPS Cust 0%	@ \$ - /mo.	200	#DIV/0!	#DIV/0!	/mo.
100 W HPS Cust 100%	@ \$ - /mo.	200	#DIV/0!	#DIV/0!	/mo.
150 W HPS Cust 0%	@ \$ - /mo.	300	#DIV/0!	#DIV/0!	/mo.
150 W HPS Cust 100%	@ \$ - /mo.	300	#DIV/0!	#DIV/0!	/mo.

Security (Decorative) Lighting Service (DOL-I)

Lantern

35 W HPS Cust 0%	@ \$ - /mo.	14	#DIV/0!	#DIV/0!	/mo.
35 W HPS Cust 100%	@ \$ - /mo.	14	#DIV/0!	#DIV/0!	/mo.
100 W HPS Cust 0%	@ \$ - /mo.	40	#DIV/0!	#DIV/0!	/mo.
100 W HPS Cust 100%	@ \$ - /mo.	40	#DIV/0!	#DIV/0!	/mo.
250 W HPS Cust 0%	@ \$ - /mo.	100	#DIV/0!	#DIV/0!	/mo.
250 W HPS Cust 100%	@ \$ - /mo.	100	#DIV/0!	#DIV/0!	/mo.

Shoebox

100 W HPS Cust 0%	@ \$ - /mo.	40	#DIV/0!	#DIV/0!	/mo.
100 W HPS Cust 100%	@ \$ - /mo.	40	#DIV/0!	#DIV/0!	/mo.
250 W HPS Cust 0%	@ \$ - /mo.	100	#DIV/0!	#DIV/0!	/mo.
250 W HPS Cust 100%	@ \$ - /mo.	100	#DIV/0!	#DIV/0!	/mo.
400 W HPS Cust 0%	@ \$ - /mo.	160	#DIV/0!	#DIV/0!	/mo.
400W HPS Cust 100%	@ \$ - /mo.	160	#DIV/0!	#DIV/0!	/mo.
800 W HPS Cust 0%	@ \$ - /mo.	320	#DIV/0!	#DIV/0!	/mo.
800 W HPS Cust 100%	@ \$ - /mo.	320	#DIV/0!	#DIV/0!	/mo.

Vapor Street Lighting Ornamental Service (OSL-V-I) Frozen

						Annual	Prior Annual
175 W MV	@ \$ - /mo.	63	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
250 W MV	@ \$ - /mo.	95	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
400 W MV	@ \$ - /mo.	151	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
100 W HPS	@ \$ - /mo.	40	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
150 W HPS	@ \$ - /mo.	60	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
200 W HPS	@ \$ - /mo.	80	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -

Controlled Private Area Lighting (PAL-I) Frozen

						Annual	
175 W MV	@ \$ - /mo.	63	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
400 W MV	@ \$ - /mo.	151	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
400 W MV (Flood)	@ \$ - /mo.	151	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
1000 W MV (Flood)	@ \$ - /mo.	355	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
100 W HPS	@ \$ - /mo.	40	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
200 W HPS	@ \$ - /mo.	80	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
150 W HPS (Flood)	@ \$ - /mo.	60	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -
400 W HPS (Flood)	@ \$ - /mo.	160	#DIV/0!	#DIV/0!	/mo.	#DIV/0!	\$ -

Street Lighting Service Dusk to Dawn (SL-I)

Inc 1000 lumen lamps	@ \$ - /mo.	34	#DIV/0!	#DIV/0!	/mo.	#DIV/0!
MV 7000 lumen lamps	@ \$ - /mo.	63	#DIV/0!	#DIV/0!	/mo.	#DIV/0!

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Workpaper 10 - Resultant Retail Rates

			Per kWh Rate Adj	Resultant per kWh Rates	
			from page 2, Part II, column (k)		
			#DIV/0!		
<u>Residential Service (RS)</u>					
<u>General Use</u>					
Customer Charge	@	/month			
Delivery Charge					
Summer - All kWh	@ \$	- /kWh		#DIV/0!	/kWh
Winter (Oct-May)	@ \$	- /kWh		#DIV/0!	/kWh
Energy Cost Adjustment	@	/kWh			
<u>Space Heating</u>					
Customer Charge	@	/month	#DIV/0!	* only for 2nd block in winter -- Space Heating are billed same rates as "Residential - General Use" except for usage occurring in the 2nd block in the Winter	
Delivery Charge					
Summer - All kWh	@	/kWh		#DIV/0!	/kWh
Winter (Oct-May)					
0-800 kWh	@ \$	- /kWh		#DIV/0!	/kWh
801-5800 kWh	@ \$	- /kWh		#DIV/0!	/kWh
5801 kWh and above	@ \$	- /kWh		#DIV/0!	/kWh
Energy Cost Adjustment	@	/kWh			
<u>General Service Small (GSS)</u>					
Customer Charge	@	/month	#DIV/0!		
Delivery Charge					
Summer - (July to Oct.)	@ \$	- /kWh		#DIV/0!	/kWh
Winter (Nov-Jun)	@ \$	- /kWh		#DIV/0!	/kWh
Energy Cost Adjustment	@	/kWh			
<u>General Service Large (GSL)</u>					
Customer Charge	@	/month	#DIV/0!		
Demand Charge per kW>9					
Summer - (July to Oct.)	@	/kW			
Winter (Nov-Jun)	@	/kW			
Delivery Charge					
Summer - (July to Oct.)	@ \$	- /kWh		#DIV/0!	/kWh
Winter (Nov-Jun)	@ \$	- /kWh		#DIV/0!	/kWh
Energy Cost Adjustment	@	/kWh			
<u>General Service Space Heating</u>					
Demand Charge per kW>9			#DIV/0!	* for heating months only	Note that per SPECo, all Commercial Space Heat customers are on GSL.
Summer - (July to Oct.)	@	/kW			
Winter (Nov-Jun)	@	/kW			
Energy Charge					
GSL(GSL summer rate for non-heat mos)	@	/kWh		#DIV/0!	
GSS (GSS summer rate for non-heat mos)	@	/kWh		#DIV/0!	
Heating (November - June)	@ \$	- /kWh		#DIV/0!	/kWh
Energy Cost Adjustment					
<u>Industrial Service (IS)</u>					
Customer Charge	@	/month	#DIV/0!		
Demand Charge per kW>10					
Summer - (July to Oct.)	@	/kW			
Winter (Nov-Jun)	@	/kW			
Delivery Charge					
Summer - (July to Oct.)	@ \$	- /kWh		#DIV/0!	/kWh
Winter (Nov-Jun)	@ \$	- /kWh		#DIV/0!	/kWh
Energy Cost Adjustment	@	/kWh			
<u>Industrial Service-Primary Discount</u>					
Customer Charge	@	/month	2% discount off IS		
Demand Charge per kW>10					
Summer - (July to Oct.)	@	/kW			
Winter (Nov-Jun)	@	/kW			
Delivery Charge					
Summer - (July to Oct.)	@	/kWh		#DIV/0!	/kWh
Winter (Nov-Jun)	@	/kWh		#DIV/0!	/kWh
Energy Cost Adjustment	@	/kWh			

actual adj.	Gets up to	Still Need	Resultant Space Heat
#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0! *

actual adj.	Gets up to	Still Need	Space Heat only
#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0! *

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Worksheet 10 - Resultant Retail Rates (Continued)

Exhibit 1-4
Page 15

			Per kWh Rate Adj from page 2, Part II, column (k) same as IS	Resultant per kWh Rates	
<u>Interruptible Industrial Service (INT)</u>					
Customer Charge	@	/month			
Demand Charge per kW>10					
Non-Interruptible					
Summer - (July to Oct.)	@	/kW			
Winter (Nov-Jun)	@	/kW			
Interruptible					
Summer - (July to Oct.)	@	/kW			
Winter (Nov-Jun)	@	/kW			
Penalty					
Summer - (July to Oct.)	@	/kW			
Winter (Nov-Jun)	@	/kW			
Delivery Charge					
Summer - (July to Oct.)	@ \$	-	/kWh	#DIV/0!	/kWh
Winter (Nov-Jun)	@ \$	-	/kWh	#DIV/0!	/kWh
Energy Cost Adjustment	@		/kWh		
<u>Real-Time Pricing (RTP)</u>					
Customer Charge	@	/month			
Delivery Charge	@	/month			
<u>Transmission Level Service (STR)</u>					
<u>Service at 34.5 kV Voltage</u>					
Customer Charge	@	/month			
Demand Charge					
Demand Requirements		/kW			
OATT		/kW			
Local Access Charge	\$	-	/kW	#DIV/0!	/kW
Energy Charge					
Energy Charge		/kWh			
Energy Cost Adjustment		/kWh			
Delivery Charge	@	/kWh			/kWh
<u>Service at 115 kV Voltage</u>					
Customer Charge	@	/month			
Demand Charge					
Demand Requirements	@	/kW			
OATT	@	/kW			
Energy Charge					
Energy Charge	@	/kWh			
Energy Cost Adjustment	@	/kWh			
Delivery Charge	@ \$	-	/kWh		/kWh
<u>Municipal Power Service (M-I)</u>					
				#DIV/0!	
Customer Charge	@	/month			
Delivery Charge					
Summer - (July to Oct.)	@ \$	-	/kWh	#DIV/0!	/kWh
Winter (Nov-Jun)	@ \$	-	/kWh	#DIV/0!	/kWh
Energy Cost Adjustment	@	/kWh			
<u>Water Pumping Service (WP)</u>					
				#DIV/0!	
Customer Charge	@	/month			
Delivery Charge					
Summer - (July to Oct.)	@ \$	-	/kWh	#DIV/0!	/kWh
Winter (Nov-Jun)	@ \$	-	/kWh	#DIV/0!	/kWh
Energy Cost Adjustment	@	/kWh			
<u>Irrigation Service (IP-I)</u>					
				#DIV/0!	
Demand Charge per HP contracted per year	@	/HP/yr.			
Delivery Charge					
Summer - (July to Oct.)	@ \$	-	/kWh	#DIV/0!	/kWh
Winter (Nov-Jun)	@ \$	-	/kWh	#DIV/0!	/kWh
Energy Cost Adjustment	@	/kWh			
<u>Temporary Service (CS)</u>					
				#DIV/0!	
Delivery Charge	@ \$	-	/kWh	#DIV/0!	/kWh
Energy Cost Adjustment	@	/kWh			

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 11 - Comparison of Revenue

(a)	(b)	(c)	(d)	(e)	(f)
Line		Test	34.5kV FBR	<u>Increase (Decrease)</u>	
No.	Rate Schedule	Year	Rates	Amount	Percent
		Revenue	Revenue		
		(\$)	(\$)	(\$)	(%)
1	Residential Service (RS)				
2	General Use	\$ -	#DIV/0!	#DIV/0!	0.0%
3	Space Heating	\$ -	#DIV/0!	#DIV/0!	0.0%
4	General Service Small (GSS)	\$ -	#DIV/0!	#DIV/0!	0.0%
5	General Service Large (GSL)	\$ -	#DIV/0!	#DIV/0!	0.0%
6	General Service Space Heating	\$ -	#DIV/0!	#DIV/0!	0.0%
7	Industrial Service (IS)	\$ -	#DIV/0!	#DIV/0!	0.0%
8	Interruptible Industrial Service (INT)	\$ -	#DIV/0!	#DIV/0!	0.0%
9	Real -Time Pricing (RTP)	\$ -	#DIV/0!	#DIV/0!	0.0%
10	Transmission Level Service (STR)	\$ -	#DIV/0!	#DIV/0!	0.0%
11	Municipal Power Service (M-I)	\$ -	#DIV/0!	#DIV/0!	0.0%
12	Water Pumping Service (WP)	\$ -	#DIV/0!	#DIV/0!	0.0%
13	Irrigation Service (IP-I)	\$ -	#DIV/0!	#DIV/0!	0.0%
14	Temporary Service (CS)	\$ -	#DIV/0!	#DIV/0!	0.0%
15	Lighting	\$ -	#DIV/0!	#DIV/0!	0.0%
16	Total Retail Rates	\$ -	#DIV/0!	#DIV/0!	0.0%

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Comparison of Average Rate

(a)	(b)	(c)	(d)	(e)	(f)
Line		Energy	<u>Average Rate</u>		Increase
No.	Rate Class	Sales	Test Year	Rate Adj.	(Decrease)
		(kWh)	(¢/kWh)	(¢/kWh)	(%)
1	Residential Service (RS)				
2	General Use	-	N.A.	N.A.	N.A.
3	Space Heating	-	N.A.	N.A.	N.A.
4	General Service Small (GSS)	-	N.A.	N.A.	N.A.
5	General Service Large (GSL)	-	N.A.	N.A.	N.A.
6	General Service Space Heating	-	N.A.	N.A.	N.A.
7	Industrial Service (IS)	-	N.A.	N.A.	N.A.
8	Interruptible Industrial Service (INT)	-	N.A.	N.A.	N.A.
9	Real -Time Pricing (RTP)	-	N.A.	N.A.	N.A.
10	Transmission Level Service (STR)	-	N.A.	N.A.	N.A.
11	Municipal Power Service (M-I)	-	N.A.	N.A.	N.A.
12	Water Pumping Service (WP)	-	N.A.	N.A.	N.A.
13	Irrigation Service (IP-I)	-	N.A.	N.A.	N.A.
14	Temporary Service (CS)	-	N.A.	N.A.	N.A.
15	Lighting	-	N.A.	N.A.	N.A.

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Revenue Requirement and Rate Calculation
For the Historical Test Year Ending December 31, 2013

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
Line			Unadjusted		Adjusted			FBR
No	Description	Source	Historical Test Year [2013]	Adjustments No. Amount	Historical Test Year [2013]	Allocation Factor Name Factor		Revenue Requirement
			Source: WP2			Source: WP3		
1	Operating Expenses							
2	Power Production Expense	WP1, L29, Col (d)	-		\$ -	0.000000	\$	-
3	Cost of Purchased Power	WP1, L30, Col (d)	\$ 19,590,065		\$ 19,590,065	0.000000	\$	-
4	Transmission O&M	WP1, L31, Col (d)	\$ 568,443		\$ 568,443	1.000000	\$	568,443
5	Distribution Expense-Operation	WP1, L32, Col (d)	\$ 1,869,477	[1] \$ -	\$ 1,869,477	DOM	0.000000	\$ -
6	Distribution Expense-Maintenance	WP1, L33, Col (d)	\$ 763,890	[2] \$ -	\$ 763,890	DOM	0.000000	\$ -
7	Consumer Accounts Expense	WP1, L34, Col (d)	\$ 700,775		\$ 700,775		0.000000	\$ -
8	Customer Service and Informational Expense	WP1, L35, Col (d)	\$ 453,751		\$ 453,751		0.000000	\$ -
9	Sales Expense	WP1, L36, Col (d)	\$ -		\$ -		0.000000	\$ -
10	Administration & General	WP1, L37, Col (d)	\$ 1,712,129	[3] \$ (58,206)	\$ 1,653,923	LAB	0.059095	\$ 97,738
11	Total O&M Expense	Sum (L2:L10)						\$ 666,181
12	Depreciation and Amortization	WP1, L38, Col (d)	\$ 1,825,431	[4] \$ 104,575	\$ 1,930,006	NP	0.276508	\$ 533,662
13	Property Tax	WP1, L43, Col (d)	\$ -		\$ -	NP	0.276508	\$ -
14	Other Taxes	WP1, L44, Col (d)	\$ 630		\$ 630	NP	0.276508	\$ 174
15	L.T. Interest	WP1, L45, Col (d)	\$ 1,494,636	[5] \$ (33,033)	\$ 1,461,603	NP	0.276508	\$ 404,145
16	Interest Charged to Construction - Credit	WP1, L46, Col (d)	\$ -	[6] \$ -	\$ -	NP	0.276508	\$ -
17	Interest-Other	WP1, L47, Col (d)	\$ 262	[7] \$ 5,438	\$ 5,700	NP	0.276508	\$ 1,576
18	Other Deductions	WP1, L48, Col (d)	\$ 193,353	[8] \$ (193,353)	\$ -	NP	0.276508	\$ -
19	Total Cost of Electric Service							\$ 1,605,738
20								
21	Margin Requirement							
22	Principal Payments	WP1, L62, Col (d)	\$ 861,149	[9] \$ 339,659	\$ 1,200,808	NP	0.27650798	\$ 332,033
23	L.T. Interest	L15	\$ 1,494,636	\$ (33,033)	\$ 1,461,603	NP	0.27650798	\$ 404,145
24	Subtotal	Sum (L22:L23)						\$ 404,145 \$ 736,178
25	Required Coverage Ratio	WP1, L64, Col (d)						1.80 1.80
26	Gross Margin Requirements	L24 x L25						727,461 1,325,120
27	Less: Offsets to Margin Requirements	WP4, L4 or L11, Col (i)						404,145 940,200
28	Net Margin Requirement	L26 - L27						\$ 323,316 \$ 384,920
29								
30	Total Revenue Requirements							
31	Using the greater of OTIER or MDSC Margin Requirements	L19 + L28						\$1,990,659
32	Divided By Total (Retail and Wholesale) Billing Demand	WP5, L30, Col (Total)						939,321 kW
33	Unadjusted Unit Rate	L31 / L32						\$2.12/kW-mo.
34	Less: Property Tax Surcharge	Dkt. No. 15-PLCE-176-TAR*						\$0.17/kW-mo.
35	Resultant Unit Rate							\$1.95/kW-mo.

* Property Tax surcharge is from 14-PLCE-312-TAR, 2013 portion only, as utilized in Commission-approved 15-PLCE-176-TAR (excluding the under-recovery for 2012 due to a partial year for the initial rider).

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 1 - Input Data
For the Historical Test Year Ending December 31, 2013

Line No	Description	Source	(b)	(c)	Amount	(d)	(e)	Notes	(f)
1	A. Net Plant in Service								
2									
3	1. Facilities Used to Provide Local Access Delivery Service								
4	Transmission Facilities								
5	350 Land and Land Rights	Trial Balance			\$	54,791			
6	352 Structures and Improvements	Trial Balance			\$	266,060			
7	353 Station Equipment	Trial Balance			\$	6,243,006			
8	355 Poles and Fixtures	Trial Balance			\$	7,386,428			
9	356 O.H. Conductors and Devices	Trial Balance			\$	5,806,675			
10	358 U.G. Conductors and Devices	Trial Balance			\$	3,706			
11	Subtotal	Sum(L5:L10)			\$	19,760,667	\$	9,812,261	GL acct 108.5
12	Distribution Facilities (If Applicable)								
13	360 Land and Land Rights	Company Direct Assessment				N/A		N/A	
14	361 Structures and Improvements	Company Direct Assessment				N/A		N/A	
15	362 Station Equipment	Company Direct Assessment				N/A		N/A	
16	Subtotal	L13 + L15			\$	-	\$	-	
17	Total	L11 + L16			\$	19,760,667	\$	9,812,261	
18									
19	2. All Facilities								
20	301-301 Intangible Plant	Trial Balance				-		-	
21	350-359 Transmission Plant	Trial Balance			\$	19,760,667	\$	9,812,261	GL acct 108.5
22	360-373 Distribution Plant	Trial Balance			\$	42,991,722	\$	18,560,441	GL acct. 108.6,108.61
23	389-399 General Plant	Trial Balance			\$	4,001,276	\$	1,967,599	GL acct. 108.7-108.78
24	Total				\$	66,753,665	\$	30,340,302	
25									
26									
27									
28	B. Operating Expenses								
29	Power Production Expense	Statement of Operations			\$	-			
30	Cost of Purchased Power	Statement of Operations			\$	19,590,065			
31	Transmission O&M	Statement of Operations			\$	568,443			
32	Distribution Expense-Operation	Statement of Operations			\$	1,869,477			
33	Distribution Expense-Maintenance	Statement of Operations			\$	763,890			
34	Consumer Accounts Expense	Statement of Operations			\$	700,775			
35	Customer Service and Informational Expense	Statement of Operations			\$	453,751			
36	Sales Expense	Statement of Operations			\$	-			
37	Administrative and General	Statement of Operations			\$	1,712,129			
38	Depreciation and Amortization	Statement of Operations			\$	1,825,431	\$	1,930,006	
39	Depreciation Expense - Distribution	Trial Balance			\$	1,300,080			
40	Depreciation Expense - Transmission	Trial Balance			\$	454,745			
41	Depreciation Expense - General Plant	Trial Balance			\$	70,606			
42	Amortization of AP (booked within Depreciation Expense)	Trial Balance			\$	-			
43	Property Tax	Statement of Operations			\$	-			
44	Other Taxes	Statement of Operations			\$	630			
45	L.T. Interest	Statement of Operations			\$	1,494,636	\$	1,461,603	
46	Interest Charged to Construction - Credit	Statement of Operations			\$	-	\$	-	
47	Interest-Other	Statement of Operations			\$	262	\$	5,700	
48	Other Deductions	Statement of Operations			\$	193,353			
49									
50	C. Payroll								
51	Transmission	Payroll Journal (Labor Amt)			\$	57,204			Part of GL acct
52	Distribution	Payroll Journal (Labor Amt)			\$	518,874			560-573
53	Customer Accounting	Payroll Journal (Labor Amt)			\$	253,281			580-598
54	Customer Service and Information	Payroll Journal (Labor Amt)			\$	138,650			901-905
55	Sales	Payroll Journal (Labor Amt)			\$	-			907-910
56	Administration and General	Payroll Journal (Labor Amt)			\$	559,383			911-916
57	Total				\$	1,527,392			920-932
58									Non-capitalized items
59									
60	D. Miscellaneous								
61	1. Debt Service								
62	Principal Payments	Supplementary Company Records			\$	861,149	\$	1,200,808	Source/Notes
63									Per Company records.
64	2. Target OTIER/MDSC	As approved by Commission				1.80			Proposed value in this year's filing
65									
66	3. Margin Requirement Offsets								
67	Investment in Associate Organizations - Patronage Capital	Balance Sheet	\$	173,349	\$	204,327			
68	Generation & Transmission Capital Credits	Statement of Operations			\$	-			
69	Other Capital Credits and Patronage Dividends	Statement of Operations			\$	39,433			
70	Non-Operating Margins - Interest	Statement of Operations			\$	199			
71	Cash Received from G&T/Lenders	Supplementary Company Records			\$	-			Per Company records.
72									
73	4. Other								
74	AP Amortization Booked in Other Deductions	Supplementary Company Records			\$	193,353			Per Company records.

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 2 - Adjustments To Historical Test Year Expenses
For the Historical Test Year Ending December 31, 2013

<u>Line No</u>	<u>Type</u>	<u>Source</u>	<u>Amount</u>	<u>Notes</u>
1	1. Adjustment to Distribution Operations Expense per K.S.A. 66-101f(a), if any:			
2	Applicable Disallowance - Distribution Operations	WP6	\$ -	not applicable
3	Total Adjustment	L2	<u>\$ -</u>	
4				
5	2. Adjustment to Distribution Maintenance Expense per K.S.A. 66-101f(a), if any:			
6	Applicable Disallowance - Distribution Maintainance	WP6	\$ -	not applicable
7	Total Adjustment	L6	<u>\$ -</u>	
8				
9	3. Adjustment to Administrative & General per K.S.A. 66-101f(a), if any:			
10	Applicable Disallowance - A&G	WP6	\$ (58,206)	
11	Total Adjustment	L10	<u>\$ (58,206)</u>	
12				
13	4. Adjustment to Depreciation Expense			
14	Historical Amount	Pg.1, L12, Col (d)	\$ 1,825,431	
15	Projected	WP1, L38, Col (e)	\$ 1,930,006	
16	Total Adjustment	L15 - L14	<u>\$ 104,575</u>	
17				
18	5. Adjustment to LT Interest			
19	Historic Amount	Pg.1, L15, Col (d)	\$ 1,494,636	
20	Projected Amount	WP1, L45, Col (e)	\$ 1,461,603	
21	Total Adjustment	L20 - L19	<u>\$ (33,033)</u>	
22				
23	6. Adjustment to Interest Charged To Construction			
24	Historical Amount	Pg.1, L16, Col (d)	\$ -	
25	Projected Amount	WP1, L46, Col (e)	\$ -	
26	Total Adjustment	L25 - L24	<u>\$ -</u>	
27				
28	7. Adjustment to Interest-Other			
29	Historical Amount	Pg.1, L17, Col (d)	\$ 262	
30	Projected Amount	WP1, L47, Col (e)	\$ 5,700	
31	Total Adjustment	L30 - L29	<u>\$ 5,438</u>	
32				
33	8. Adjustment to Other Deductions:			
34	Historical Amount	Pg.1, L18, Col (d)	\$ 193,353	
35	Less: Amortization of AP booked in Other Deductions	WP1, L74, Col (e)	\$ 193,353	amort. of AP is constant
36	Historical Amount with AP removed	L34 - L35	\$ -	
37	Sub-total Adjustment	L36 - L34	\$ (193,353)	
38	Less: Applicable Disallowance - Other Deductions	WP6	\$ -	Dkt. No. 15-PLCE-176-TAR
39	Total Adjustment	L37 - L38	<u>\$ (193,353)</u>	
40				
41	9. Adjustment to Principal Payments			
42	Historical Amount	Pg.1, L22, Col (a)	\$ 861,149	
43	Projected Amount	WP1, L62, Col (e)	\$ 1,200,808	
44	Total Adjustment	L43 - L42	<u>\$ 339,659</u>	
45				

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 3 - Allocation Factors
For the Historical Test Year Ending December 31, 2013

<u>Line No.</u>	<u>Description</u>	<u>Source</u>	<u>Allocator</u>	<u>Amount</u>
1	Distribution O&M Allocation Factor			
2	Distr. Plant used to provide Local Access Delivery Service	WP1, L16, Col (d)		\$ -
3	Total Distribution Plant	WP1, L22, Col (d)		\$ 42,991,722
4				
5	Allocation Factor	L2 / L3	DOM	-
6				
7	Labor Allocation Factor			
8	Transmission Wages	WP1, L51, Col (d)		\$ 57,204
9	Allocated Distribution Wages			
10	Total Distribution Wages	WP1, L52, Col (d)		\$ 518,874
11	Allocation Factor	L5	DOM	\$ -
12		L10 * L11		\$ -
13	Total LAC Wages	L8 + L12		<u>\$ 57,204</u>
14				
15	Total Wages Other than A&G			
16	Total Wages	WP1, L57, Col (d)		\$ 1,527,392
17	Less: Administration & General Wages	WP1, L56, Col (d)		<u>559,383</u>
18		L16 - L17		\$ 968,009
19				
20	Transmission Labor Allocator	L13 / L18	LAB	<u>0.059095</u>
21				
22	Net Plant Allocation Factor			
23	Plant-in-Service			
24	Transmission	WP1, L11, Col (d)		\$ 19,760,667
25	Distr. used to provide Local Access Service	L2		\$ -
26	General Plant			
27	Total General Plant	WP1, L23, Col (d)		\$ 4,001,276
28	Allocation Factor	L20	LAB	0.059095
29		L27 * L28		<u>\$ 236,454</u>
30	Total LAC Plant-in-Service	L24 + L25 + L29		<u>\$ 19,997,121</u>
31				
32	Accumulated Reserves for Depreciation			
33	Transmission	WP1, L11, Col (e)		\$ 9,812,261
34	Distribution Used in LAC	WP1, L16, Col (e)		\$ -
35	Allocated General Plant			
36	Total General Plant	WP1, L23, Col (e)		\$ 1,967,599
37	Allocation Factor	L20	LAB	0.059095
38		L36 * L37		<u>\$ 116,275</u>
39	Total LAC Accum. Depr. Res.	L33 + L34 + L38		<u>\$ 9,928,536</u>
40				
41	Net Plant Used in LAC	L30 - L39		<u>\$ 10,068,586</u>
42				
43	Total Plant in Service	WP1, L24, Col (e)		\$ 66,753,665
44	Less: Total Accum. Reserves for Depr.	WP1, L24, Col (e)		<u>\$ 30,340,302</u>
45	Total Net Plant	L43 - L44		<u>\$ 36,413,363</u>
46				
47	Transmission Net Plant Allocator	L41 / L45	NP	<u>0.276508</u>

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 4 - Margin Requirement Offsets
For the Historical Test Year Ending December 31, 2013

(a) Line No	(b) Metric	(c) Source	(d) Historical Tot Amount	(e) Adjustment pg 1, Col (e)	(f) Adjusted Amount	(g) Allocation Factor Name	(h) Allocation Factor Factor	(i) Allocated to FBR
1	OTIER							
2	LT Interest Expense	Pg.1, L15, Col (d)	\$ 1,494,636	\$ (33,033)	\$ 1,461,603	NP	0.276507982	\$ 404,145
3	Cash Received from G&T/lenders	WP1, Col (d), L71	\$ -	\$ -	\$ -	NP	0.276507982	\$ -
4			<u>\$ 1,494,636</u>	<u>\$ (33,033)</u>	<u>\$ 1,461,603</u>			<u>\$ 404,145</u>
5								
6	MDSC							
7	LT Interest Expense	L2	\$ 1,494,636	\$ (33,033)	\$ 1,461,603	NP	0.276507982	\$ 404,145
8	Depreciation Expense	Pg.1, L12, Col (d)	\$ 1,825,431	\$ 104,575	\$ 1,930,006	NP	0.276507982	\$ 533,662
9	Non-Operating Margins - Interest	WP1, L70, Col (d)	\$ 199	\$ -	\$ 199	NP	0.276507982	\$ 55
10	Cash Patronage Capital*	L18	\$ 8,455	\$ -	\$ 8,455	NP	0.276507982	\$ 2,338
11	Resultant Amount	Sum (L7:L10)	<u>\$ 3,328,722</u>		<u>\$ 3,400,263</u>			<u>\$ 940,200</u>
12								
13	*Calculate Pat. Cap. (Cash):							
14	Inv. in Assoc. Org. - Patr. Capital - Current Yr.	WP1, L67, Col (d)	\$ 204,327					
15	Inv. in Assoc. Org. - Patr. Capital - Prior Yr.	WP1, L67, Col (c)	\$ 173,349					
16	Generation & Transmission Capital Credits	WP1, L68, Col (d)	\$ -					
17	Other Capital Cr. and Patronage Dividends	WP1, L69, Col (d)	<u>\$ 39,433</u>					
18	Resultant Amount	L15 + L16 + L17 - L14	<u>\$ 8,455</u>					

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 5 - Summary of Local Access Billing Demands (kW)
For the Historical Test Year Ending December 31, 2013

<u>Line</u>	<u>Description</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Total</u>	
1	Total Local Access System ¹	68,847	69,439	63,753	59,703	66,540	101,745	108,335	106,080	100,890	66,645	71,018	76,804	959,799	
2	CP Date	24	21	25	10	28	26	09	30	07	04	21	06		
3	CP Time (hour Ending)	800	1200	1100	1100	1700	1700	1700	1600	1700	1300	1900	1000		
4															
5	Wholesale Customers @ Del. Pt.														
6	Morganville (Westar)	259	234	261	209	238	432	453	405	529	240	248	570	4,077	
7	Osborne (KMEA) --Metered	2,437	2,303	2,423	2,469	2,281	3,925	4,163	4,153	3,828	2,656	1,951	2,705	35,294	
8	Osborne (KMEA) --Generation	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Subtotal--Osborne	2,437	2,303	2,423	2,469	2,281	3,925	4,163	4,153	3,828	2,656	1,951	2,705	35,294	
10	Stockton (KMEA)--Metered	2,014	2,066	1,907	2,024	2,268	3,744	3,860	3,977	3,821	1,946	2,161	2,338	32,124	
11	Stockton (KMEA)--Generation	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	Subtotal--Stockton	2,014	2,066	1,907	2,024	2,268	3,744	3,860	3,977	3,821	1,946	2,161	2,338	32,124	
13	Washington (KMEA)--Metered	1,773	1,950	1,979	1,878	2,112	3,236	3,605	3,658	3,118	2,311	1,810	1,873	29,302	
14	Washington (KMEA)--Generation	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Subtotal--Washington	1,773	1,950	1,979	1,878	2,112	3,236	3,605	3,658	3,118	2,311	1,810	1,873	29,302	
16	Cawker City (AR)	882	976	861	896	1,006	1,503	1,528	1,437	1,385	1,040	1,039	1,083	13,638	
17	Glasco (AR)	509	502	424	450	589	1,010	1,071	1,025	1,031	570	513	541	8,234	
18	Glen Elder(AR)	582	647	488	523	658	1,153	1,204	1,211	1,185	762	642	628	9,682	
19	Mankato (AR)	1,205	1,172	1,103	1,133	1,355	2,173	2,311	2,503	2,282	1,501	1,221	1,259	19,220	
20	KEPCO	17,973	18,578	14,804	13,690	13,764	20,749	23,932	22,065	23,772	13,188	18,278	18,156	218,948	
21	Subtotal	27,634	28,427	24,250	23,272	24,271	37,925	42,126	40,434	40,951	24,212	27,862	29,153	370,518	Wholesale
22	Losses @ 2.18% of 34.5 kV Output	602	620	529	507	529	827	918	881	893	528	607	636	8,077	
23	Subtotal with Losses (@ Source)	28,237	29,046	24,779	23,779	24,800	38,752	43,044	41,315	41,844	24,740	28,470	29,789	378,595	
24															
25	Prairie Land Retail														
26	Retail with Losses (@ Source)	40,610	40,392	38,974	35,924	41,740	62,993	65,291	64,765	59,046	41,904	42,548	47,016	581,203	
27	Losses @ 2.13% of 34.5 kV Input	866	862	832	766	891	1,344	1,393	1,382	1,260	894	908	1,003	12,400	
28	Retail @ Delivery Point	39,744	39,531	38,142	35,158	40,849	61,649	63,898	63,384	57,786	41,010	41,640	46,013	568,803	Retail
29															
30	Total Load (wholesale at source before loss + retail @ delivery pt.)													939,321	

¹ With "behind the meter" generation added back in.

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6a - Summary of Exclusions
For the Historical Test Year Ending December 31, 2013

ACCOUNT	DESCRIPTION	Total Amount	Total Adjustment
1.926.2	EMPLOYEE PENSION & BENEFITS	40,203.86	18,735.04
1.930.1	ADVERTISING	12,615.22	4,942.49
1.930.2	MICELLANEOUS GENERAL	97,926.91	5,007.30
1.930.21	MISC GEN - DUES	85,596.27	20,863.58
1.930.3	MISC GEN - DONATIONS	10,257.25	5,128.63
1.930.31	ANNUAL MEETING	25,349.60	1,972.02
			56,649.05
	Staff-Adjusted		58,206.00

Dkt. No. 15-PLCE-176-TAR

Notes:

Prairie Land's review of General and Administrative expenses by category:

Employee Benefits:	Meals provided to employees, clothing purchased for promotional reasons, and retirement party expenses and gifts were excluded 100%. Costs associated with short term disability, safety related clothing, and expenses for job-required physicals were not excluded.
Advertising:	Expenses related to company image and general advertising were excluded at 100%, all other advertising related to member safety, legal ads, and meeting announcements were not excluded.
Misc General:	Miscellaneous & General expenses were carefully looked at to the true business expense versus other indirect expenses. Expenses related to travel, software support fees, property taxes, liability insurance, and labor were not excluded. Expenses for meals, subscriptions to publications, and retirement meals were excluded at 100%. Donations and dues that may have been included in this category were excluded at 50%
Dues:	Dues to associated organization were excluded at 50% with the exception of Kansas Electric Cooperative (KEC) monthly assessment due. KEC provides needed service and programs to electric cooperatives for the mutual benefit of its member cooperatives. The dues associated with KEC represent services KEC provides for our cooperative, which include our safety program, OSHA compliance, safety inspections, staff & board training, and administrative functions on a statewide level.
Donations:	50% of all donations were excluded.
Annual Meeting:	Expenses with the publication, balloting, office notice mailings, and expenses with regard to holding the annual meeting were not excluded. However, expenses concerning gifts for members were excluded 100%

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6b - Detail of Exclusions
For the Historical Test Year Ending December 31, 2013

Account	Description	Date	Vendor	Reference	Total Amount	Percent Excluded	Total Adjustment
1.926.2	EMPLOYEE PENSION & BENEFIT	1/2/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT-TERM DISABILITY	475.85	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	1/17/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT-TERM DISABILITY	475.85	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	1/29/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE SAFETY CLOTHING	862.87	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	1/31/2013	1235 - JAMBOREE FOODS	SAFETY MTG MEAL EXPENSE	198.91	100%	198.91
1.926.2	EMPLOYEE PENSION & BENEFIT	1/31/2013	US BANK CREDIT CARD	JC - SAFETY MTG MEAL EXP	185.02	100%	185.02
1.926.2	EMPLOYEE PENSION & BENEFIT	2/16/2013	9999 - SMITH COUNTY MEMORIAL HOSPITAL	EMPLOYEE PHYSICAL - C BIEKER	211.69	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	2/17/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT-TERM DISABILITY	430.81	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	2/20/2013	2410 - PIZZA HUT OF NORTON	SAFETY MEETING MEAL EXP.	162.41	100%	162.41
1.926.2	EMPLOYEE PENSION & BENEFIT	2/20/2013	9999 - HASTINGS RADIOLOGY ASSOCIATES	NEW EMPLOYEE X-RAY - C BIEKER #102287CH	14.57	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	2/22/2013	2799 - SMITH COUNTY FAMILY PRACTICE	EMPLOYEE PHYSICAL - C BIEKER	15.00	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	2/27/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMP CLOTHING - L LISTER	61.30	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	2/28/2013	1235 - JAMBOREE FOODS	SAFETY MEETING MEAL EXP.	9.67	100%	9.67
1.926.2	EMPLOYEE PENSION & BENEFIT	2/28/2013	3559 - RODS THRIFTWAY	RETIREMENT RECEPTION - B SCHMIDT	44.01	100%	44.01
1.926.2	EMPLOYEE PENSION & BENEFIT	2/28/2013	US BANK CREDIT CARD	3706 - B SCHMIDT RETIREMENT GIFT	558.25	100%	558.25
1.926.2	EMPLOYEE PENSION & BENEFIT	2/28/2013	US BANK CREDIT CARD	JC - SAFETY MTG MEAL EXP	240.90	100%	240.90
1.926.2	EMPLOYEE PENSION & BENEFIT	2/28/2013	US BANK CREDIT CARD	JC - B SCHMIDT RETIREMENT MEAL EXP	316.50	100%	316.50
1.926.2	EMPLOYEE PENSION & BENEFIT	2/28/2013	726 - DUCKWALL - ALCO STORES, INC.	B SCHMIDT RET PARTY - SUPPLIES	2.47	100%	2.47
1.926.2	EMPLOYEE PENSION & BENEFIT	3/17/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT-TERM DISABILITY	470.10	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	3/20/2013	3379 - WISEMAN, BOBBI	SAFETY MEETING MEALS	328.90	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	3/27/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMP CLOTHING	1,056.57	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	3/31/2013	US BANK CREDIT CARD	1062 - CONC SAFETY MTG MEAL EXP	193.06	100%	193.06
1.926.2	EMPLOYEE PENSION & BENEFIT	4/10/2013	1238 - J.F. BEAVER ADVERTISING	EMPLOYEE SHIRTS -ANNUAL MEETING	1,603.29	100%	1,603.29
1.926.2	EMPLOYEE PENSION & BENEFIT	4/17/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT-TERM DISABILITY	470.10	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	4/17/2013	3379 - WISEMAN, BOBBI	SAFETY MEETING MEALS	328.90	100%	328.90
1.926.2	EMPLOYEE PENSION & BENEFIT	4/25/2013	1238 - J.F. BEAVER ADVERTISING	EMPLOYEE SHIRTS - ANNUAL MEETING	49.36	100%	49.36
1.926.2	EMPLOYEE PENSION & BENEFIT	4/29/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMP CLOTHING - BRETT	38.01	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	4/29/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMP CLOTHING - NATHAN	68.99	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	4/29/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMP CLOTHING - RYAN G	185.19	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	4/30/2013	US BANK CREDIT CARD	3639 - CONC SAFETY MTG MEAL EXP	195.42	100%	195.42
1.926.2	EMPLOYEE PENSION & BENEFIT	5/15/2013	3379 - WISEMAN, BOBBI	SAFETY MEETING MEAL EXP	328.90	100%	328.90
1.926.2	EMPLOYEE PENSION & BENEFIT	5/17/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT-TERM DISABILITY	470.10	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	5/29/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING	3,008.04	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	5/31/2013	US BANK CREDIT CARD	JC - MAY SAFETY MTG MEAL EXP	250.72	100%	250.72
1.926.2	EMPLOYEE PENSION & BENEFIT	6/17/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT-TERM DISABILITY	470.10	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	6/17/2013	9999 - RUSS'	G.HARPER - 50YRS OF SERVICE PRESENT	135.52	100%	135.52
1.926.2	EMPLOYEE PENSION & BENEFIT	6/19/2013	3379 - WISEMAN, BOBBI	SAFETY MEETING MEAL EXP	419.35	100%	419.35
1.926.2	EMPLOYEE PENSION & BENEFIT	6/26/2013	9999 - CALLY'S CAKES	GLADYSS RETIREMENT PARTY	78.00	100%	78.00
1.926.2	EMPLOYEE PENSION & BENEFIT	6/27/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - LHAYS	123.46	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	6/30/2013	US BANK CREDIT CARD	3639 - SAFETY MTG MEAL EXP	247.48	100%	247.48
1.926.2	EMPLOYEE PENSION & BENEFIT	7/17/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT TERM DISABILITY	470.10	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	7/17/2013	3379 - WISEMAN, BOBBI	SAFETY MEETING MEALS	328.90	100%	328.90
1.926.2	EMPLOYEE PENSION & BENEFIT	7/30/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - B.MCCHESENEY	40.77	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	7/30/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - LHAYS	63.81	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	7/30/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - T.RUTHERFORD	40.77	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	7/31/2013	US BANK CREDIT CARD	1062 - SAFETY MTG MEAL EXP	18.65	100%	18.65
1.926.2	EMPLOYEE PENSION & BENEFIT	7/31/2013	US BANK CREDIT CARD	JC - DEFENSIVE DRIVING TRNG MEAL EXPS	165.21	100%	165.21
1.926.2	EMPLOYEE PENSION & BENEFIT	8/17/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT TERM DISABILITY	470.10	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	8/20/2013	3379 - WISEMAN, BOBBI	SAFETY MEETING MEALS	328.90	100%	328.90
1.926.2	EMPLOYEE PENSION & BENEFIT	8/28/2013	2630 - ROY'S SALES & SERVICE	30 YEAR SERVICE GIFT - B MCKENNA	321.75	100%	321.75
1.926.2	EMPLOYEE PENSION & BENEFIT	8/28/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - CHANCE	350.41	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	8/28/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - TYLER	40.77	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	8/31/2013	US BANK CREDIT CARD	3639 - SAFETY MTG MEAL EXP	233.26	100%	233.26
1.926.2	EMPLOYEE PENSION & BENEFIT	9/18/2013	3379 - WISEMAN, BOBBI	SAFETY MEETING MEALS	328.90	100%	328.90
1.926.2	EMPLOYEE PENSION & BENEFIT	9/30/2013	US BANK CREDIT CARD	JC - SAFETY MTG MEAL EXP	222.27	100%	222.27
1.926.2	EMPLOYEE PENSION & BENEFIT	10/1/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT TERM DISABILITY	470.10	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/1/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - B.MCCHESENEY	76.46	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/1/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - B.MCKENNA	110.59	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/1/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - C.BIEKER	667.97	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/1/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - E.HARTWELL	110.59	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/1/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - G.GLENNEMEIER	42.08	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/1/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - M.HAYES	243.66	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/1/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - R.DUSIN	120.79	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/1/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - S.MILLER	194.56	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/1/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - T-SHIRTS	248.07	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/1/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - T.RUTHERFORD	79.19	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/16/2013	3379 - WISEMAN, BOBBI	SAFETY MEETING MEALS (40)	328.90	100%	328.90
1.926.2	EMPLOYEE PENSION & BENEFIT	10/30/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - E.THOMPSON	246.75	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	10/31/2013	US BANK CREDIT CARD	1062 - CONC SAFETY MTG MEAL EXP	207.96	100%	207.96
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT TERM DISABILITY	470.10	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - A.GILSDORF	232.05	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - E.MENDENHALL	77.35	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - J.MUETING	354.06	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - K.KOHLMAN	354.06	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - M.KNOX	154.72	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - V.FREY	309.40	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS	271.69	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS - A.GILSDORF	221.28	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS - E.MENDENHALL	134.71	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS - J.MUETING	368.80	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS - K.KOHMAN	368.80	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS - M.KNOX	221.28	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS - V.FREY	368.80	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS - A.GILSDORF	158.21	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS - T.RUTHERFORD	58.37	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - D.BEEMS	355.69	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - T.RUTHERFORD	46.23	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - W.LAWSON	355.69	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS - E.HARTWELL	150.13	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS - R.DUSIN	75.88	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/1/2013	1170 - IGEAR	EMPLOYEE CLOTHING - JEANS - R.MORGAN	151.75	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/20/2013	1170 - IGEAR	EMPLOYEE CLOTHING	214.87	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	11/20/2013	1170 - IGEAR	EMPLOYEE CLOTHING - R.MORGAN	89.80	0%	-

Prairie Land Electric Cooperative, Inc.
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34.5kV Formula Based Rate
Work Paper 6b - Detail of Exclusions
For the Historical Test Year Ending December 31, 2013

Account	Acct Desc	Date	Ven:	Reference	Total Amount	Percent Excluded	Total Adjustment
1.926.2	EMPLOYEE PENSION & BENEFIT	11/26/2013	884 - FLOWER GALLERY	FLOWERS - T.HARDING FUNERAL	43.26	50%	21.63
1.926.2	EMPLOYEE PENSION & BENEFIT	11/20/2013	3379 - WISEMAN, BOBBI	SAFETY MEETING MEAL EXPENSE	328.90	100%	328.90
1.926.2	EMPLOYEE PENSION & BENEFIT	11/30/2013	US BANK CREDIT CARD	3639 - CONC SAFETY MTG MEAL EXP.	238.99	100%	238.99
1.926.2	EMPLOYEE PENSION & BENEFIT	12/1/2013	2449 - PRINCIPAL LIFE GROUP,	SHORT TERM DISABILITY	447.00	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	12/4/2013	2344 - PFONZ	CHRISTMAS PARTY	1,925.74	100%	1,925.74
1.926.2	EMPLOYEE PENSION & BENEFIT	12/9/2013	1620 - MAPES & MILLER, CPAS	PENSION PLANNING	126.75	100%	126.75
1.926.2	EMPLOYEE PENSION & BENEFIT	12/13/2013	9999 - THE 19TH HOLE	CHRISTMAS PARTY	1,668.38	100%	1,668.38
1.926.2	EMPLOYEE PENSION & BENEFIT	12/16/2013	1396 - KENSINGTON LOCKERS, INC.	EMPLOYEE CHRISTMAS GIFTS - HAMS	1,993.15	100%	1,993.15
1.926.2	EMPLOYEE PENSION & BENEFIT	12/17/2013	1396 - KENSINGTON LOCKERS, INC.	EMPLOYEE CHRISTMAS GIFTS - HAMS	39.59	100%	39.59
1.926.2	EMPLOYEE PENSION & BENEFIT	12/18/2013	9999 - CALLY'S CAKES	R.ENFIELD - RETIREMENT PARTY CAKE	78.00	100%	78.00
1.926.2	EMPLOYEE PENSION & BENEFIT	12/18/2013	1235 - JAMBOREE FOODS	SAFETY MEETING MEAL/E.ENFIELD RETIREMENT	211.09	100%	211.09
1.926.2	EMPLOYEE PENSION & BENEFIT	12/19/2013	3559 - ROD'S THRIFTWAY	R.TROST - RETIREMENT PARTY SUPPLIES	78.78	100%	78.78
1.926.2	EMPLOYEE PENSION & BENEFIT	12/26/2013	9999 - RICHARD J KUEKER, OD, PA	PRESCRIPTION SAFETY GLASSES - J.LANOUE	270.00	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	12/30/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	EMPLOYEE CLOTHING - T-SHIRTS - D.BEEMS	54.08	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	12/31/2013	1170 - IGEAR	EMPLOYEE CLOTHING - G.GLENNEMEIER	97.97	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	12/31/2013	1170 - IGEAR	EMPLOYEE CLOTHING - B.MCCHESNEY	197.47	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	12/31/2013	1170 - IGEAR	EMPLOYEE CLOTHING - J.PELEY	141.04	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	12/31/2013	1170 - IGEAR	EMPLOYEE CLOTHING - L.KEISWETTER	835.69	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	12/31/2013	1170 - IGEAR	EMPLOYEE CLOTHING - B.BLUE	296.67	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	12/31/2013	1170 - IGEAR	EMPLOYEE CLOTHING - E.HARTWELL	218.51	0%	-
1.926.2	EMPLOYEE PENSION & BENEFIT	12/31/2013	US BANK CREDIT CARD	KG - EMPLOYEE CHRISTMAS GIFTS	3,762.54	100%	3,762.54
1.926.2	EMPLOYEE PENSION & BENEFIT	12/31/2013	US BANK CREDIT CARD	3639 - SAFETY MTG MEAL EXP	228.66	100%	228.66
1.926.2 - EMPLOYEE BENEFITS					40,203.86		18,735.04

Account	Acct Desc	Date	Ven:	Reference	Debit	Percent Excluded	Total Adjustment
1.930.1	Advertising	1/1/2013	976 - HANSON DIRECTORY SERVICE, INC.	DIRECTORY ADVERTISING	84.00	0%	-
1.930.1	Advertising	1/8/2013	1280 - KEC	KCL MONTHLY ASSESSMENT DUES	285.25	50%	142.63
1.930.1	Advertising	2/1/2013	9999 - PHILLIPSBURG HIGH SCHOOL	YEARBOOK AD	80.00	100%	80.00
1.930.1	Advertising	2/1/2013	9999 - SIXTEEN 60 PUBLISHING CO.	SMITH CENTER FOOTBALL SPONSORSHIP	99.95	100%	99.95
1.930.1	Advertising	2/5/2013	1280 - KEC	KCL MONTHLY ASSESSMENT DUES	285.52	0%	-
1.930.1	Advertising	2/8/2013	2394 - PINNACLE PUBLISHING	KANZALAND REGIONAL TELEPHONE DIRECTORY	435.00	0%	-
1.930.1	Advertising	2/10/2013	1066 - HIBU INC. - WEST	YELLOW BOOK LISTINGS	634.08	0%	-
1.930.1	Advertising	3/1/2013	1280 - KEC	KCL MONTHLY ASSESSMENT DUES	284.88	50%	142.44
1.930.1	Advertising	4/1/2013	1280 - KEC	KCL MONTHLY ASSESSMENT DUES	284.91	50%	142.46
1.930.1	Advertising	4/8/2013	1430 - KKAN-AM & KQMA-FM	RADIO ADS - ANNUAL MEETING	132.60	0%	-
1.930.1	Advertising	4/15/2013	9999 - THE LINN PALMER RECORD	ANNUAL SUBSCRIPTION	23.38	100%	23.38
1.930.1	Advertising	4/28/2013	1381 - KNCK / KCKS-FM	RADIO ADS - ANNUAL MEETING	432.00	0%	-
1.930.1	Advertising	4/29/2013	1377 - KDNS FM	RADIO ADS - ANNUAL MEETING	192.00	0%	-
1.930.1	Advertising	4/30/2013	1467 - KSVS	RADIO ADS - ANNUAL MEETING	528.00	0%	-
1.930.1	Advertising	5/1/2013	1453 - KREP-FM	RADIO ADS - ANNUAL MEETING	120.00	0%	-
1.930.1	Advertising	5/3/2013	1984 - NEX-TECH	DIRECTORY ADVERTISING CONTRACT	646.52	0%	-
1.930.1	Advertising	5/4/2013	1280 - KEC	KCL MO ASSESSMENT DUES	283.03	50%	141.52
1.930.1	Advertising	5/6/2013	1280 - KEC	KCL MONTHLY ASSESSMENT DUES	284.48	50%	142.24
1.930.1	Advertising	5/6/2013	1440 - KQNK RADIO	RADIO ADS - ANNUAL MEETING	110.96	0%	-
1.930.1	Advertising	5/6/2013	1430 - KKAN-AM & KQMA-FM	RADIO ADS - GRADUATION SALUTE 2013	32.50	100%	32.50
1.930.1	Advertising	5/9/2013	483 - CLIFTON BALL ASSOCIATION	SIGN AT BALL PARK	25.00	100%	25.00
1.930.1	Advertising	5/15/2013	1218 - JAYHAWKER ROUNDUP RODEO	CHUTE SPONSORSHIP/ADVERTISING-PRCA RODEO	130.00	100%	130.00
1.930.1	Advertising	6/1/2013	9999 - KAREN MUELLER - CITY CLERK	AFFIDAVIT OF PUBLICATION - REIMBURSEMENT	775.50	0%	-
1.930.1	Advertising	6/1/2013	2370 - PHILLIPS COUNTY REVIEW	ANNUAL SUBSCRIPTION	18.31	100%	18.31
1.930.1	Advertising	6/1/2013	2370 - PHILLIPS COUNTY REVIEW	HIGHWAY 36 GUIDE INV #6138	97.50	100%	97.50
1.930.1	Advertising	6/1/2013	2370 - PHILLIPS COUNTY REVIEW	HIGHWAY 36 GUIDE INV #6139	97.50	100%	97.50
1.930.1	Advertising	6/7/2013	9999 - PHILLIPSBURG RODEO ASSOCIATION	2013 ARENA SIGN	125.00	100%	125.00
1.930.1	Advertising	6/30/2013	1377 - KDNS FM	RADIO ADS	105.00	100%	105.00
1.930.1	Advertising	6/30/2013	1381 - KNCK / KCKS-FM	RADIO ADS - HARVEST	147.00	0%	-
1.930.1	Advertising	7/1/2013	1280 - KEC	KCL MONTHLY ASSESSMENT DUES	282.09	50%	141.05
1.930.1	Advertising	7/1/2013	1430 - KKAN-AM & KQMA-FM	RADIO ADS - 4TH JULY SAFETY	322.73	0%	-
1.930.1	Advertising	7/17/2013	1430 - KKAN-AM & KQMA-FM	RADIO AD - PHILLIPS COUNTY FAIR	50.00	100%	50.00
1.930.1	Advertising	7/18/2013	1430 - KKAN-AM & KQMA-FM	RADIO AD - SMITH COUNTY FAIR	50.00	100%	50.00
1.930.1	Advertising	7/23/2013	1430 - KKAN-AM & KQMA-FM	RADIO AD - NORTON COUNTY FAIR	32.50	100%	32.50
1.930.1	Advertising	7/28/2013	1381 - KNCK / KCKS-FM	RADIO ADS - FAIR	297.00	100%	297.00
1.930.1	Advertising	7/28/2013	1381 - KNCK / KCKS-FM	RADIO ADS - HARVEST	252.00	0%	-
1.930.1	Advertising	7/31/2013	1377 - KDNS FM	RADIO ADS - HARVEST	180.00	0%	-
1.930.1	Advertising	7/31/2013	1453 - KREP-FM	RADIO ADS - HARVEST SAFETY	199.50	0%	-
1.930.1	Advertising	7/31/2013	1467 - KSVS	RADIO AD - HARVEST SAFETY	475.00	0%	-
1.930.1	Advertising	8/6/2013	1280 - KEC	KCL MONTHLY ASSESSMENT DUES	281.65	50%	140.83
1.930.1	Advertising	8/7/2013	1430 - KKAN-AM & KQMA-FM	RADIO ADS - BACK TO SCHOOL SAFETY	32.50	0%	-
1.930.1	Advertising	8/9/2013	836 - FARM & HOME SUPPLY	ADVERTISING - AD REPUBLIC & JEWELL BOOKS	461.25	100%	461.25
1.930.1	Advertising	8/9/2013	838 - FARM & HOME PUBLISHERS, LTD	ADVERTISING - AD REPUBLIC & JEWELL BOOKS	461.25	100%	461.25
1.930.1	Advertising	8/11/2013	1430 - KKAN-AM & KQMA-FM	RADIO ADS - ROOKS COUNTY FAIR	32.50	100%	32.50
1.930.1	Advertising	8/25/2013	1381 - KNCK / KCKS-FM	RADIO ADS - FAIR	99.00	100%	99.00
1.930.1	Advertising	8/29/2013	9999 - STOCKTON HIGH SCHOOL	YEARBOOK AD	65.00	100%	65.00
1.930.1	Advertising	9/1/2013	2806 - SMITH COUNTY PIONEER	STATEMENT OF NONDISCRIMINATION	76.69	0%	-
1.930.1	Advertising	9/4/2013	1280 - KEC	KCL MONTHLY ASSESSMENT DUES	281.55	50%	140.78
1.930.1	Advertising	9/4/2013	2447 - PRINT-5	NOTICE OF NONDISCRIMINATION	37.40	0%	-
1.930.1	Advertising	9/5/2013	127 - THE BELLEVILLE TELESCOPE	STATEMENT OF NONDISCRIMINATION	52.50	0%	-
1.930.1	Advertising	9/5/2013	475 - CLAY CENTER PUBLISHING CO, INC	STATEMENT OF NONDISCRIMINATION	33.60	0%	-
1.930.1	Advertising	9/5/2013	2283 - OSBORNE COUNTY FARMER	STATEMENT OF NONDISCRIMINATION	40.26	0%	-
1.930.1	Advertising	9/9/2013	836 - FARM & HOME SUPPLY	VOID CHECK #104172	(461.25)	0%	-
1.930.1	Advertising	9/13/2013	150 - BELOIT CALL	STATEMENT OF NONDISCRIMINATION	40.80	0%	-
1.930.1	Advertising	9/16/2013	1430 - KKAN-AM & KQMA-FM	RADIO AD - FARM SAFETY WEEK	32.50	0%	-
1.930.1	Advertising	9/30/2013	2900 - STOCKTON SENTINEL	STATEMENT OF NONDISCRIMINATION	29.59	0%	-
1.930.1	Advertising	10/1/2013	2370 - PHILLIPS COUNTY REVIEW	STATEMENT OF NONDISCRIMINATION	54.50	0%	-
1.930.1	Advertising	10/1/2013	2965 - SUPERIOR PUBLISHING CO., INC.	STATEMENT OF NONDISCRIMINATION	18.64	0%	-
1.930.1	Advertising	10/9/2013	9999 - PHILLIPSBURG HIGH SCHOOL USD #325	YEARBOOK AD	80.00	100%	80.00
1.930.1	Advertising	10/27/2013	1381 - KNCK / KCKS-FM	RADIO ADS - HARVEST SAFETY	99.00	0%	-
1.930.1	Advertising	10/27/2013	1381 - KNCK / KCKS-FM	RADIO ADS - HARVEST SAFETY	99.00	0%	-
1.930.1	Advertising	10/31/2013	1430 - KKAN-AM & KQMA-FM	RADIO ADS - COOP MONTH	48.75	100%	48.75
1.930.1	Advertising	10/31/2013	1430 - KKAN-AM & KQMA-FM	RADIO ADS - HALLOWEEN SAFETY	32.50	0%	-
1.930.1	Advertising	11/1/2013	1467 - KSVS	RADIO ADS	345.00	100%	345.00
1.930.1	Advertising	11/4/2013	1280 - KEC	KCL MONTHLY ASSESSMENT DUES	282.34	50%	141.17
1.930.1	Advertising	11/4/2013	1440 - KQNK RADIO	RADIO ADS - 4-H WEEK	32.50	100%	32.50
1.930.1	Advertising	11/7/2013	9999 - CONCORDIA HIGH SCHOOL	YEAR BOOK AD	50.00	100%	50.00
1.930.1	Advertising	12/1/2013	1430 - KKAN-AM & KQMA-FM	RADIO AD - HOLIDAY GREETINGS PKG	113.75	100%	113.75
1.930.1	Advertising	12/3/2013	1280 - KEC	KCL MONTHLY ASSESMENT	282.41	50%	141.21
1.930.1	Advertising	12/12/2013	2447 - PRINT-5	AD - CHRISTMAS GREETINGS	30.00	100%	30.00
1.930.1	Advertising	12/16/2013	976 - HANSON DIRECTORY SERVICE, INC.	DIRECTORY ADVERTISING	85.80	0%	-
1.930.1	Advertising	12/20/2013	2160 - THE NORTON TELEGRAM	AD - CHRISTMAS GREETINGS	30.55	100%	30.55
1.930.1	Advertising	12/29/2013	1381 - KNCK / KCKS-FM	RADIO ADS - CHRISTMAS	198.00	100%	198.00
1.930.1	Advertising	12/31/2013	1430 - KKAN-AM & KQMA-FM	RADIO ADS - CHRISTMAS MUSIC PROGRAM	32.50	100%	32.50
1.930.1	Advertising	12/31/2013	1440 - KQNK RADIO	RADIO AD - CHRISTMAS/NEW YEARS GREETINGS	32.50	100%	32.50
1.930.1	Advertising	12/31/2013	1467 - KSVS	RADIO AD - HOLIDAY	150.00	100%	150.00
ACCOUNT 1.930.1 - ADVERTISING					12,615.22		4,942.49

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6b - Detail of Exclusions
For the Historical Test Year Ending December 31, 2013

Account	Acct Desc	Date	Ven:	Reference	Debit	Percent Excluded	Total Adjustment
1930.2	MICELLANEOUS GENERAL	1/3/2013	9999 - JAMES BOB POLLOCK MEMORIAL	MEMORIAL	22.75	50%	11.38
1930.2	MICELLANEOUS GENERAL	1/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	58.27	0%	-
1930.2	MICELLANEOUS GENERAL	1/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	60.49	0%	-
1930.2	MICELLANEOUS GENERAL	1/15/2013	9999 - BIEKER, CHANCE	MILEAGE REIMBURSEMENT - ORIENTATION	72.32	0%	-
1930.2	MICELLANEOUS GENERAL	1/21/2013	1740 - MILLER, ALLAN	REIMBURSEMENT OF TRAVEL EXPENSES	468.55	0%	-
1930.2	MICELLANEOUS GENERAL	1/22/2013	3379 - WISEMAN, BOBBI	BOARD MEETING MEAL EXPENSE	100.91	100%	100.91
1930.2	MICELLANEOUS GENERAL	1/31/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING/ADMIN FEES	102.38	0%	-
1930.2	MICELLANEOUS GENERAL	1/31/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.44	0%	-
1930.2	MICELLANEOUS GENERAL	1/31/2013	3391 - FLEET SERVICES	MONTHLY CARD CHARGE	55.90	0%	-
1930.2	MICELLANEOUS GENERAL	1/31/2013	FIE	INSUR - PROPERTY DAMAGE	58.08	0%	-
1930.2	MICELLANEOUS GENERAL	1/31/2013	FIE	MKEC PROPERTY TAX	2,076.33	0%	-
1930.2	MICELLANEOUS GENERAL	1/31/2013	LABOR		2,712.48	0%	-
1930.2	MICELLANEOUS GENERAL	1/31/2013	US BANK CREDIT CARD	AM - CEO CONF TRAVEL EXPS	161.66	0%	-
1930.2	MICELLANEOUS GENERAL	1/31/2013	US BANK CREDIT CARD	CL - NRECA ANNUAL MTG TRAVEL EXP (CL)	178.11	0%	-
1930.2	MICELLANEOUS GENERAL	1/31/2013	US BANK CREDIT CARD	CL - ST FRANCIS MEAL EXP	8.92	0%	-
1930.2	MICELLANEOUS GENERAL	1/31/2013	US BANK CREDIT CARD	JC - MEAL EXP	36.60	0%	-
1930.2	MICELLANEOUS GENERAL	1/31/2013	US BANK CREDIT CARD	KG - TECH ADV MTG TRAVEL EXP (KG/SS)	430.03	0%	-
1930.2	MICELLANEOUS GENERAL	2/5/2013	1565 - MCCLYMONT, JOHN	TRAVEL REIMBURSEMENT FOR KEC CONFERENCE	306.74	0%	-
1930.2	MICELLANEOUS GENERAL	2/11/2013	2975 - TAYLOR SUPPLY	CREDIT REFUND (OCT STMT DISCOUNT)	(2.99)	0%	-
1930.2	MICELLANEOUS GENERAL	2/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	57.10	0%	-
1930.2	MICELLANEOUS GENERAL	2/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	59.10	0%	-
1930.2	MICELLANEOUS GENERAL	2/14/2013	127 - THE BELLEVILLE TELESCOPE	TWO YEAR SUBSCRIPTION	86.04	100%	86.04
1930.2	MICELLANEOUS GENERAL	2/14/2013	1280 - KEC	KEC ANNUAL MEETING/DIRECTORS WORKSHOP	1,997.13	0%	-
1930.2	MICELLANEOUS GENERAL	2/14/2013	9999 - KNODEL FUNERAL HOME	CHARLSIE ROGERS MEMORIAL	26.00	50%	13.00
1930.2	MICELLANEOUS GENERAL	2/20/2013	9999 - ALS ASSOC., KEITH WORTHINGTON CHAPTER	STEPHEN E. PARR MEMORIAL	26.00	50%	13.00
1930.2	MICELLANEOUS GENERAL	2/22/2013	2160 - THE NORTON TELEGRAM	JOB ADS - ACCOUNTANT/CSR	442.26	50%	221.13
1930.2	MICELLANEOUS GENERAL	2/26/2013	1540 - LOOK, CHARLES W.	REIMBURSEMENT OF TRAVEL EXPENSES	39.65	0%	-
1930.2	MICELLANEOUS GENERAL	2/26/2013	3379 - WISEMAN, BOBBI	BOARD MEETING MEALS	114.37	100%	114.37
1930.2	MICELLANEOUS GENERAL	2/27/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	"NO GUN/VIDEO" DECALS	100.67	0%	-
1930.2	MICELLANEOUS GENERAL	2/28/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING/ADMIN FEES	102.38	0%	-
1930.2	MICELLANEOUS GENERAL	2/28/2013	1673 - TMHC SERVICES, INC.	PRE-EMPLOYMENT TEST - C BIEKER	70.00	0%	-
1930.2	MICELLANEOUS GENERAL	2/28/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.44	0%	-
1930.2	MICELLANEOUS GENERAL	2/28/2013	486 - CLOUD CORP	ANNUAL LUNCHEON TABLE	150.00	100%	150.00
1930.2	MICELLANEOUS GENERAL	2/28/2013	9999 - THE ADVOCATE	JOB ADS - ACCOUNTANT/CSR	110.50	50%	55.25
1930.2	MICELLANEOUS GENERAL	2/28/2013	FIE	INSUR - PROPERTY DAMAGE	58.08	0%	-
1930.2	MICELLANEOUS GENERAL	2/28/2013	FIE	MKEC PROPERTY TAX	2,076.33	0%	-
1930.2	MICELLANEOUS GENERAL	2/28/2013	LABOR		4,643.48	0%	-
1930.2	MICELLANEOUS GENERAL	2/28/2013	US BANK CREDIT CARD	AM - MEETING EXPENSES	1,595.96	0%	-
1930.2	MICELLANEOUS GENERAL	2/28/2013	US BANK CREDIT CARD	BM - MEAL EXP	5.95	0%	-
1930.2	MICELLANEOUS GENERAL	2/28/2013	US BANK CREDIT CARD	CL - KCRE DONATION GIFT	127.00	0%	-
1930.2	MICELLANEOUS GENERAL	2/28/2013	US BANK CREDIT CARD	CL - MEETING EXPENSES	341.60	0%	-
1930.2	MICELLANEOUS GENERAL	2/28/2013	US BANK CREDIT CARD	KG - TECHADV/ANTAGE MTG EXP (KG/SS)	323.01	0%	-
1930.2	MICELLANEOUS GENERAL	3/1/2013	1233 - JEWELL COUNTY RECORD	ANNUAL SUBSCRIPTION	27.50	100%	27.50
1930.2	MICELLANEOUS GENERAL	3/1/2013	2370 - PHILLIPS COUNTY REVIEW	JOB ADS - ACCOUNTANT/CSR	105.30	50%	52.65
1930.2	MICELLANEOUS GENERAL	3/8/2013	9999 - CUBA PRESBYTERIAN CHURCH	LOREN WALTHERS MEMORIAL	40.00	50%	20.00
1930.2	MICELLANEOUS GENERAL	3/9/2013	9999 - E-470 PUBLIC HIGHWAY AUTHORITY	TOLL FEE (TECH MTG - KG/SS)	2.11	0%	-
1930.2	MICELLANEOUS GENERAL	3/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	57.10	0%	-
1930.2	MICELLANEOUS GENERAL	3/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	59.10	0%	-
1930.2	MICELLANEOUS GENERAL	3/13/2013	1885 - NRECA	2013 SUBSCRIPTION - NTL COMP SURVEY	289.25	0%	-
1930.2	MICELLANEOUS GENERAL	3/20/2013	2170 - PRAIRIE LAND PETTY CASH FUND	WKHRM MTG EXP-AK/MEAL EXPS.	41.81	0%	-
1930.2	MICELLANEOUS GENERAL	3/21/2013	3391 - FLEET SERVICES	MONTHLY CARD CHARGE	55.90	0%	-
1930.2	MICELLANEOUS GENERAL	3/22/2013	3229 - WAL-MART BUSINESS	CONC PARTY SUPPLIES - J LANOUE	24.75	100%	24.75
1930.2	MICELLANEOUS GENERAL	3/22/2013	9999 - E-470 PUBLIC HIGHWAY AUTHORITY	TOLL FEE - NRECA ANN MTG (CL)	2.11	0%	-
1930.2	MICELLANEOUS GENERAL	3/22/2013	9999 - RUSS'	BOARD GIFT - D SOLKO	262.15	100%	262.15
1930.2	MICELLANEOUS GENERAL	3/25/2013	1884 - NATIONAL RURAL ELECTRIC COOP	2013 AF&T CONFERENCE - A.STARK	503.75	0%	-
1930.2	MICELLANEOUS GENERAL	3/25/2013	884 - FLOWER GALLERY	PLANT - LDENEALUT FUNERAL	43.33	50%	21.67
1930.2	MICELLANEOUS GENERAL	3/26/2013	3379 - WISEMAN, BOBBI	BOARD MEETING MEALS	131.56	100%	131.56
1930.2	MICELLANEOUS GENERAL	3/27/2013	2806 - SMITH COUNTY PIONEER	ANNUAL SUBSCRIPTION	34.36	100%	34.36
1930.2	MICELLANEOUS GENERAL	3/28/2013	150 - BELOIT CALL	ANNUAL SUBSCRIPTION	97.49	100%	97.49
1930.2	MICELLANEOUS GENERAL	3/28/2013	9999 - BLADE EMPIRE	ANNUAL SUBSCRIPTION	118.45	100%	118.45
1930.2	MICELLANEOUS GENERAL	3/31/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING/ADMIN FEES	102.38	0%	-
1930.2	MICELLANEOUS GENERAL	3/31/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.44	0%	-
1930.2	MICELLANEOUS GENERAL	3/31/2013	3559 - RODS THRIFTWAY	JLANOUE B-DAY PARTY SUPPLIES	35.73	100%	35.73
1930.2	MICELLANEOUS GENERAL	3/31/2013	FIE	INSUR - PROPERTY DAMAGE	58.08	0%	-
1930.2	MICELLANEOUS GENERAL	3/31/2013	FIE	MKEC PROPERTY TAX	1,630.69	0%	-
1930.2	MICELLANEOUS GENERAL	3/31/2013	LABOR		1,211.91	0%	-
1930.2	MICELLANEOUS GENERAL	3/31/2013	US BANK CREDIT CARD	3706 - ADULT CPR/AED TRAINING	40.50	0%	-
1930.2	MICELLANEOUS GENERAL	3/31/2013	US BANK CREDIT CARD	3706 - CPR TRAINING MATERIAL	60.12	0%	-
1930.2	MICELLANEOUS GENERAL	3/31/2013	US BANK CREDIT CARD	AM - NRECA MTG EXPS	948.11	0%	-
1930.2	MICELLANEOUS GENERAL	3/31/2013	US BANK CREDIT CARD	CL - KEC MTG EXPS	120.06	0%	-
1930.2	MICELLANEOUS GENERAL	3/31/2013	US BANK CREDIT CARD	CL - NRECA MTG EXPS	739.12	0%	-
1930.2	MICELLANEOUS GENERAL	3/31/2013	US BANK CREDIT CARD	KG - TECH ADV CONF EXPS	700.24	0%	-
1930.2	MICELLANEOUS GENERAL	4/1/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING/ADMIN FEES	104.81	0%	-
1930.2	MICELLANEOUS GENERAL	4/1/2013	3391 - FLEET SERVICES	MONTHLY CARD CHARGE	55.90	0%	-
1930.2	MICELLANEOUS GENERAL	4/1/2013	491 - CLYDE REPUBLICAN	ANNUAL SUBSCRIPTION	23.00	100%	23.00
1930.2	MICELLANEOUS GENERAL	4/3/2013	2875 - STARK, ALISHA	MEAL EXPENSE - NEW EMPLOYEE (A WEGENER)	33.33	100%	33.33
1930.2	MICELLANEOUS GENERAL	4/4/2013	9999 - FLORAL EXPRESSIONS	PLANT FOR W.HUBER	32.49	50%	16.25
1930.2	MICELLANEOUS GENERAL	4/5/2013	450 - CHRISTY, STEVE	MEAL REIMBURSEMENT	18.74	0%	-
1930.2	MICELLANEOUS GENERAL	4/10/2013	1238 - J.F. BEAVER ADVERTISING	BOARD SHIRTS - ANNUAL MEETING	312.51	100%	312.51
1930.2	MICELLANEOUS GENERAL	4/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	59.10	0%	-
1930.2	MICELLANEOUS GENERAL	4/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	57.10	0%	-
1930.2	MICELLANEOUS GENERAL	4/22/2013	2780 - SKRD/LANT WELDING	CHAIR RACK	22.70	0%	-
1930.2	MICELLANEOUS GENERAL	4/25/2013	1238 - J.F. BEAVER ADVERTISING	BOARD SHIRTS - ANNUAL MEETING	31.48	100%	31.48
1930.2	MICELLANEOUS GENERAL	4/30/2013	1280 - KEC	HR SUMMIT - APRIL	97.50	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.44	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	FIE	CONC DEPOSIT CORRECTION	0.01	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	FIE	CONC DEPOSIT CORRECTION (ACT)	(0.01)	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	FIE	CONC DEPOSIT CORRECTION (REV)	(0.01)	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	FIE	INSUR - PROPERTY DAMAGE	58.08	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	FIE	MKEC PROPERTY TAX	1,630.69	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	LABOR		2,125.89	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	US BANK CREDIT CARD	3680 - FLOWERS (T RUTHERFORD)	27.96	50%	13.98
1930.2	MICELLANEOUS GENERAL	4/30/2013	US BANK CREDIT CARD	3680 - NEW EE MEAL EXP	80.66	100%	80.66
1930.2	MICELLANEOUS GENERAL	4/30/2013	US BANK CREDIT CARD	3698 - NRECA HR CONF REG (AK)	487.50	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	US BANK CREDIT CARD	3706 - ADULT CPR/AED TRAINING	40.50	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	US BANK CREDIT CARD	3706 - NEW EE MEAL EXP	59.20	100%	59.20
1930.2	MICELLANEOUS GENERAL	4/30/2013	US BANK CREDIT CARD	AM - MTG EXP	57.28	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	US BANK CREDIT CARD	CL - MEETING EXP	80.73	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	US BANK CREDIT CARD	KG - STAFF MEAL EXP/NEW EE MEAL EXP	73.02	100%	73.02
1930.2	MICELLANEOUS GENERAL	4/30/2013	US BANK CREDIT CARD	SC - MTG MEAL EXP	19.39	0%	-
1930.2	MICELLANEOUS GENERAL	4/30/2013	WRIGHT EXPRESS	Fleet Management Transaction	86.86	0%	-
1930.2	MICELLANEOUS GENERAL	5/1/2013	1740 - MILLER, ALLAN	REIMBURSEMENT - MEETING EXPENSES	65.40	0%	-
1930.2	MICELLANEOUS GENERAL	5/1/2013	CASH REGISTER	Cash Register	(18.74)	0%	-
1930.2	MICELLANEOUS GENERAL	5/2/2013	2875 - STARK, ALISHA	MEAL EXPENSE REIMB - M.KATS & A.STARK	20.08	100%	20.08
1930.2	MICELLANEOUS GENERAL	5/8/2013	1885 - NRECA	2013 AF-T REGISTRATION INV 1006525	861.25	0%	-

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6b - Detail of Exclusions
For the Historical Test Year Ending December 31, 2013

Account	Acct Desc	Date	Ven:	Reference	Debit	Percent Excluded	Total Adjustment
1930.2	MICELLANEOUS GENERAL	5/9/2013	2209 - NORTON ROTARY	CIRCUS TICKETS	31.20	100%	31.20
1930.2	MICELLANEOUS GENERAL	5/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	57.10	0%	-
1930.2	MICELLANEOUS GENERAL	5/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	59.10	0%	-
1930.2	MICELLANEOUS GENERAL	5/13/2013	1361 - KARNOPP, APRIL	REIMBURSEMENT - NRECA MTG TRAVEL EXP	234.72	0%	-
1930.2	MICELLANEOUS GENERAL	5/13/2013	2875 - STARK, ALISHA	REIMBURSEMENT - NRECA MTG TRAVEL EXPS	164.97	0%	-
1930.2	MICELLANEOUS GENERAL	5/22/2013	2170 - PRAIRIE LAND PETTY CASH FUND	MTG MEAL EXP	25.03	0%	-
1930.2	MICELLANEOUS GENERAL	5/22/2013	2170 - PRAIRIE LAND PETTY CASH FUND	PETTY CASH SHORTAGE	4.58	0%	-
1930.2	MICELLANEOUS GENERAL	5/28/2013	3379 - WISEMAN, BOBBI	BOARD MEETING MEALS	123.34	100%	123.34
1930.2	MICELLANEOUS GENERAL	5/31/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING / ADMIN FEES	104.81	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	FIE	INSUR - PROPERTY DAMAGE	58.08	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	FIE	MKEC PROPERTY TAX	1,630.69	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	FIE	R&S PREMIUM BUYDOWN W/ PREPMT	(512.87)	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	LABOR		2,027.01	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	US BANK CREDIT CARD	3680 - AF&T CONF TRAVEL EXP (MK)	95.16	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	US BANK CREDIT CARD	3680 - SUPERVISOR CONF REG FEE (AS/MK)	193.70	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	US BANK CREDIT CARD	3680 - WESTERN COOP MTG MEAL EXP	28.76	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	US BANK CREDIT CARD	3698 - KEC HR CONF EXPS (AK)	99.28	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	US BANK CREDIT CARD	AM - MEETING EXPS	95.39	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	US BANK CREDIT CARD	CL - MEETING EXPS	187.73	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	US BANK CREDIT CARD	KG - CFC FORUM TRAVEL EXP (KG)	135.72	0%	-
1930.2	MICELLANEOUS GENERAL	5/31/2013	WRIGHT EXPRESS	Fleet Management Transaction	182.98	0%	-
1930.2	MICELLANEOUS GENERAL	6/1/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.44	0%	-
1930.2	MICELLANEOUS GENERAL	6/10/2013	2150 - NORTON COUNTY TREASURER	APPLICATION FOR LOST TITLE - #56	10.00	0%	-
1930.2	MICELLANEOUS GENERAL	6/11/2013	9999 - KANSAS CHAMBER	KS EMPLOYMENT LAW SEMINAR	32.50	0%	-
1930.2	MICELLANEOUS GENERAL	6/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	57.10	0%	-
1930.2	MICELLANEOUS GENERAL	6/12/2013	3173 - VERIZON WIRELESS	IPADS - BOARD	59.10	0%	-
1930.2	MICELLANEOUS GENERAL	6/20/2013	1885 - NRECA	ANNUAL SUBSCRIPTION - LEGAL RPTG SERVICE	221.00	0%	-
1930.2	MICELLANEOUS GENERAL	6/30/2013	1235 - JAMBOREE FOODS	BOARD MEETING / HARPER RETIREMENT MEAL	221.94	100%	221.94
1930.2	MICELLANEOUS GENERAL	6/30/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.44	0%	-
1930.2	MICELLANEOUS GENERAL	6/30/2013	FIE	INSUR - PROPERTY DAMAGE	58.08	0%	-
1930.2	MICELLANEOUS GENERAL	6/30/2013	FIE	MKEC PROPERTY TAX	1,918.27	0%	-
1930.2	MICELLANEOUS GENERAL	6/30/2013	LABOR		4,393.84	0%	-
1930.2	MICELLANEOUS GENERAL	6/30/2013	US BANK CREDIT CARD	3639 - TIP ERROR(CREDIT ON JULY STMT)	11.50	0%	-
1930.2	MICELLANEOUS GENERAL	6/30/2013	US BANK CREDIT CARD	BM - RETIREMENT PARTY (GH)	26.25	100%	26.25
1930.2	MICELLANEOUS GENERAL	6/30/2013	US BANK CREDIT CARD	CL - MEETING EXPS	174.80	0%	-
1930.2	MICELLANEOUS GENERAL	6/30/2013	US BANK CREDIT CARD	KG - CFC FORUM EXPS.	603.86	0%	-
1930.2	MICELLANEOUS GENERAL	6/30/2013	WRIGHT EXPRESS	Fleet Management Transaction	936.87	0%	-
1930.2	MICELLANEOUS GENERAL	7/1/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING / ADMIN FEES	104.81	0%	-
1930.2	MICELLANEOUS GENERAL	7/1/2013	9999 - KANSAS CHAMBER	KS EMPLOYMENT LAW SEMINAR	32.50	0%	-
1930.2	MICELLANEOUS GENERAL	7/8/2013	9999 - FLORAL EXPRESSION	PLANT FOR APPLEBY SERVICE	37.90	50%	18.95
1930.2	MICELLANEOUS GENERAL	7/8/2013	9999 - FLORAL EXPRESSION	WIRE FOR E.MENDENHALL	49.81	50%	24.91
1930.2	MICELLANEOUS GENERAL	7/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	57.10	0%	-
1930.2	MICELLANEOUS GENERAL	7/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	59.10	0%	-
1930.2	MICELLANEOUS GENERAL	7/22/2013	497 - CLYDE CHAMBER OF COMMERCE	WATERMELON FESTIVAL - DONATION	200.00	50%	100.00
1930.2	MICELLANEOUS GENERAL	7/23/2013	3379 - WISEMAN, BOBBI	BOARD MEETING MEALS	123.34	100%	123.34
1930.2	MICELLANEOUS GENERAL	7/31/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING / ADMIN FEES	104.81	0%	-
1930.2	MICELLANEOUS GENERAL	7/31/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.44	0%	-
1930.2	MICELLANEOUS GENERAL	7/31/2013	3391 - FLEET SERVICES	CARD REPLACEMENT FEE	1.30	0%	-
1930.2	MICELLANEOUS GENERAL	7/31/2013	FIE	INSUR - PROPERTY DAMAGE	58.08	0%	-
1930.2	MICELLANEOUS GENERAL	7/31/2013	FIE	MKEC PROPERTY TAX	1,918.27	0%	-
1930.2	MICELLANEOUS GENERAL	7/31/2013	LABOR		1,458.39	0%	-
1930.2	MICELLANEOUS GENERAL	7/31/2013	US BANK CREDIT CARD	3639 - DOUBLE TIP REIMB (CLIFTON STORM)	(11.50)	0%	-
1930.2	MICELLANEOUS GENERAL	7/31/2013	US BANK CREDIT CARD	3680 - GLADYS RETIREMENT LUNCH	53.94	100%	53.94
1930.2	MICELLANEOUS GENERAL	7/31/2013	US BANK CREDIT CARD	3698 - BUC/NRECA CONF EXPS (A KARNOPP)	465.40	0%	-
1930.2	MICELLANEOUS GENERAL	7/31/2013	US BANK CREDIT CARD	AM - MEETING EXPS.	236.84	0%	-
1930.2	MICELLANEOUS GENERAL	7/31/2013	US BANK CREDIT CARD	CL - MEETING EXPS.	148.63	0%	-
1930.2	MICELLANEOUS GENERAL	7/31/2013	US BANK CREDIT CARD	JC - MEAL EXP	28.14	0%	-
1930.2	MICELLANEOUS GENERAL	7/31/2013	US BANK CREDIT CARD	KG - GLADYS RETIREMENT LUNCH	23.85	100%	23.85
1930.2	MICELLANEOUS GENERAL	7/31/2013	US BANK CREDIT CARD	KG - SAFETY SIGNS/IPHONE CASE	182.83	0%	-
1930.2	MICELLANEOUS GENERAL	8/1/2013	1885 - NRECA	REGIONS MEETING - CL	273.00	0%	-
1930.2	MICELLANEOUS GENERAL	8/2/2013	1361 - KARNOPP, APRIL	MILEAGE REIMB - NEW ORLEANS HR CONF	240.99	0%	-
1930.2	MICELLANEOUS GENERAL	8/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	57.10	0%	-
1930.2	MICELLANEOUS GENERAL	8/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	59.10	0%	-
1930.2	MICELLANEOUS GENERAL	8/14/2013	9999 - KCRC	KCRC GOLF OPEN - REGISTRATION	169.00	100%	169.00
1930.2	MICELLANEOUS GENERAL	8/16/2013	9999 - FLORAL EXPRESSION	FLOWERS - D.BEEMS MOTHER	51.91	50%	25.96
1930.2	MICELLANEOUS GENERAL	8/16/2013	9999 - REBECCA OGLESBY	COVERING OVERDRAFT FEE DUE TO ERROR	74.75	0%	-
1930.2	MICELLANEOUS GENERAL	8/23/2013	1280 - KEC	LUNCHEON FEE - C.LOOK	17.55	100%	17.55
1930.2	MICELLANEOUS GENERAL	8/26/2013	545 - CONCORDIA BLADE-EMPIRE	ANNUAL SUBSCRIPTION	98.24	100%	98.24
1930.2	MICELLANEOUS GENERAL	8/27/2013	1499 - LEVIN, OTTO	REIMBURSEMENT - IPAD REPAIRS	139.10	0%	-
1930.2	MICELLANEOUS GENERAL	8/27/2013	3379 - WISEMAN, BOBBI	BOARD MEETING MEALS	131.56	100%	131.56
1930.2	MICELLANEOUS GENERAL	8/30/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.42	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING / ADMIN FEES	104.81	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	2900 - STOCKTON SENTINEL	ANNUAL SUBSCRIPTION	22.72	100%	22.72
1930.2	MICELLANEOUS GENERAL	8/31/2013	FIE	INSUR - PROPERTY DAMAGE	58.08	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	FIE	MKEC PROPERTY TAX	1,918.27	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	FIE	RECLASS A STARK TRAVEL EXPENSES	(167.69)	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	LABOR		2,781.84	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	US BANK CREDIT CARD	3680 - KEC MTG HOTEL EXP (CL)	75.61	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	US BANK CREDIT CARD	3698 - NRECA HR CONF EXP (AK)	398.26	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	US BANK CREDIT CARD	3706 - NRECA AF&T CONF EXP (AS/MK)	1,352.65	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	US BANK CREDIT CARD	AM - AUGUST MTG EXPENSES	194.66	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	US BANK CREDIT CARD	CL - AUGUST MTG EXPENSES	389.70	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	US BANK CREDIT CARD	JC - MEETING EXPENSES	95.97	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	US BANK CREDIT CARD	KG - MIC CONF EXPENSES	166.92	0%	-
1930.2	MICELLANEOUS GENERAL	8/31/2013	WRIGHT EXPRESS	Fleet Management Transaction	53.56	0%	-
1930.2	MICELLANEOUS GENERAL	9/1/2013	2370 - PHILLIPS COUNTY REVIEW	ADS - FAIR & RODEO	48.75	50%	24.38
1930.2	MICELLANEOUS GENERAL	9/6/2013	2222 - NORTON SPORTS CENTER	SHIPPING - TRUCK TITLES #10 & #5	13.83	0%	-
1930.2	MICELLANEOUS GENERAL	9/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	57.10	0%	-
1930.2	MICELLANEOUS GENERAL	9/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	59.10	0%	-
1930.2	MICELLANEOUS GENERAL	9/12/2013	9999 - WESTERN KANSAS HR CONFERENCE	HR CONFERENCE HAYS- REGISTRATION	29.25	0%	-
1930.2	MICELLANEOUS GENERAL	9/18/2013	1540 - LOOK, CHARLES W.	REIMB TRAVEL EXPENSES - KC MGRS MTG	51.53	0%	-
1930.2	MICELLANEOUS GENERAL	9/18/2013	2170 - PRAIRIE LAND PETTY CASH FUND	KS TURNPIKE FEE (CL)	1.79	0%	-
1930.2	MICELLANEOUS GENERAL	9/18/2013	2170 - PRAIRIE LAND PETTY CASH FUND	TRAVEL ADV-MIC CONF (KG)	16.25	0%	-
1930.2	MICELLANEOUS GENERAL	9/18/2013	2170 - PRAIRIE LAND PETTY CASH FUND	WKHRMA REG FEE (AK)	13.00	0%	-
1930.2	MICELLANEOUS GENERAL	9/24/2013	3379 - WISEMAN, BOBBI	BOARD MEETING MEAL EXP	131.56	100%	131.56
1930.2	MICELLANEOUS GENERAL	9/27/2013	1250 - KSREC ACCOUNTANTS' CLUB	2013 ACCOUNTANTS MEMBERSHIP DUES	162.50	50%	81.25
1930.2	MICELLANEOUS GENERAL	9/30/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING / ADMIN FEES	99.94	0%	-
1930.2	MICELLANEOUS GENERAL	9/30/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.42	0%	-
1930.2	MICELLANEOUS GENERAL	9/30/2013	FIE	CLEAR OUT 1.236.5	2.33	0%	-
1930.2	MICELLANEOUS GENERAL	9/30/2013	FIE	CLEAR OUT 1.236.52	(0.01)	0%	-
1930.2	MICELLANEOUS GENERAL	9/30/2013	FIE	INSUR - PROPERTY DAMAGE	58.08	0%	-
1930.2	MICELLANEOUS GENERAL	9/30/2013	LABOR	MKEC PROPERTY TAX	1,918.27	0%	-
1930.2	MICELLANEOUS GENERAL	9/30/2013	US BANK CREDIT CARD	AM - MEETING TRAVEL EXPENSES	2,471.32	0%	-
1930.2	MICELLANEOUS GENERAL	9/30/2013	US BANK CREDIT CARD	BM - KCRC GOLF TOURN TRAVEL EXP	96.10	0%	-
1930.2	MICELLANEOUS GENERAL	9/30/2013	US BANK CREDIT CARD		557.16	0%	-

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6b - Detail of Exclusions
For the Historical Test Year Ending December 31, 2013

Account	Acct Desc	Date	Ven:	Reference	Debit	Percent Excluded	Total Adjustment
1.930.2	MICELLANEOUS GENERAL	9/30/2013	US BANK CREDIT CARD	CL - MEETING TRAVEL EXPENSES	274.09	0%	-
1.930.2	MICELLANEOUS GENERAL	9/30/2013	WRIGHT EXPRESS	Fleet Management Transaction	400.64	0%	-
1.930.2	MICELLANEOUS GENERAL	10/3/2013	CASH REGISTER	Cash Register	(69.91)	0%	-
1.930.2	MICELLANEOUS GENERAL	10/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	57.10	0%	-
1.930.2	MICELLANEOUS GENERAL	10/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	59.10	0%	-
1.930.2	MICELLANEOUS GENERAL	10/21/2013	1885 - NRECA	RURAL ELECTRIC MAGAZINE SUBSCRIPTIONS	559.00	100%	559.00
1.930.2	MICELLANEOUS GENERAL	10/21/2013	2011 - NISC	2013 MIC CONFERENCE	1,455.63	0%	-
1.930.2	MICELLANEOUS GENERAL	10/22/2013	3379 - WISEMAN, BOBBI	BOARD MEALS (15)	123.34	100%	123.34
1.930.2	MICELLANEOUS GENERAL	10/31/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.42	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	FIE	INSUR - PROPERTY DAMAGE	53.54	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	FIE	MKEC PROPERTY TAX	1,918.27	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	FIE	RECLASS M KATS EMP REIMB	(61.74)	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	LABOR		4,379.42	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	US BANK CREDIT CARD	3680-NRECA REGION VII HOTEL EXPS (CL)	118.34	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	US BANK CREDIT CARD	3698 - MIC CONF EXPS (JA/SS)	769.24	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	US BANK CREDIT CARD	AM - KEC/SUNFLOWER MTG EXPS	227.06	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	US BANK CREDIT CARD	AM - NRECA REGION VII MTG EXPS	317.23	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	US BANK CREDIT CARD	CL - KEC/SUNFLOWER MTG EXPS	235.84	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	US BANK CREDIT CARD	CL - NRECA REGION VII MTG EXPS	193.38	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	US BANK CREDIT CARD	JC - MIC CONF EXPS (JC)	553.73	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	US BANK CREDIT CARD	JC - MIC CONF EXPS (JC/JA/SS)	67.72	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	US BANK CREDIT CARD	KG - MEAL EXPS (CFC/AUDITORS)	34.27	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	US BANK CREDIT CARD	KG - MIC CONF MTG EXPS	504.85	0%	-
1.930.2	MICELLANEOUS GENERAL	10/31/2013	WRIGHT EXPRESS	Fleet Management Transaction	305.02	0%	-
1.930.2	MICELLANEOUS GENERAL	11/1/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING / ADMIN FEES	99.94	0%	-
1.930.2	MICELLANEOUS GENERAL	11/1/2013	1885 - NRECA	2013 REGIONS MEETING - A.MILLER	289.25	0%	-
1.930.2	MICELLANEOUS GENERAL	11/1/2013	3391 - FLEET SERVICES	LATE FEE	491.66	100%	491.66
1.930.2	MICELLANEOUS GENERAL	11/1/2013	3391 - FLEET SERVICES	MONTHLY CARD CHARGE	55.90	0%	-
1.930.2	MICELLANEOUS GENERAL	11/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	57.10	0%	-
1.930.2	MICELLANEOUS GENERAL	11/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	59.10	0%	-
1.930.2	MICELLANEOUS GENERAL	11/26/2013	1740 - MILLER, ALLAN	EMPLOYEE REIMBURSEMENT - TRAVEL	119.39	0%	-
1.930.2	MICELLANEOUS GENERAL	11/30/2013	1362 - KANSAS DEPT OF HEALTH	2014 AST ANNUAL REGISTRATION	13.00	0%	-
1.930.2	MICELLANEOUS GENERAL	11/30/2013	3379 - WISEMAN, BOBBI	BOARD MEETING MEAL EXPENSE	123.34	100%	123.34
1.930.2	MICELLANEOUS GENERAL	11/30/2013	FIE	INSUR - PROPERTY DAMAGE	53.54	0%	-
1.930.2	MICELLANEOUS GENERAL	11/30/2013	FIE	MKEC PROPERTY TAX	2,004.71	0%	-
1.930.2	MICELLANEOUS GENERAL	11/30/2013	LABOR		2,931.13	0%	-
1.930.2	MICELLANEOUS GENERAL	11/30/2013	US BANK CREDIT CARD	3680 - REGION VII HOTEL EXP (CL)	118.34	0%	-
1.930.2	MICELLANEOUS GENERAL	11/30/2013	US BANK CREDIT CARD	3706 - ACCT CONF EXPS (AS/MK/AW)	686.18	0%	-
1.930.2	MICELLANEOUS GENERAL	11/30/2013	US BANK CREDIT CARD	AM - NOVEMBER MEETING EXPS (CFC/NRECA)	1,100.95	0%	-
1.930.2	MICELLANEOUS GENERAL	11/30/2013	US BANK CREDIT CARD	CL - NOVEMBER MEETING EXPS (CFC/NRECA)	803.71	0%	-
1.930.2	MICELLANEOUS GENERAL	11/30/2013	US BANK CREDIT CARD	KG - NOVEMBER MEETING EXPENSES (CFC)	1,270.63	0%	-
1.930.2	MICELLANEOUS GENERAL	11/30/2013	WRIGHT EXPRESS	Fleet Management Transaction	454.94	0%	-
1.930.2	MICELLANEOUS GENERAL	12/1/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.42	0%	-
1.930.2	MICELLANEOUS GENERAL	12/1/2013	3391 - FLEET SERVICES	LATE FEE CREDIT	(195.00)	100%	(195.00)
1.930.2	MICELLANEOUS GENERAL	12/1/2013	3391 - FLEET SERVICES	MONTHLY CARD CHARGE	55.90	0%	-
1.930.2	MICELLANEOUS GENERAL	12/6/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING / ADMIN FEES	99.94	0%	-
1.930.2	MICELLANEOUS GENERAL	12/6/2013	1885 - NRECA	2014 ANNUAL MEETING REGISTRATION	2,502.50	0%	-
1.930.2	MICELLANEOUS GENERAL	12/9/2013	2170 - PRAIRIE LAND PETTY CASH FUND	CORRECT CASH ADV ERROR	(9.43)	0%	-
1.930.2	MICELLANEOUS GENERAL	12/9/2013	2170 - PRAIRIE LAND PETTY CASH FUND	TRAVEL EXP REIMBURSEMENT (KG)	32.50	0%	-
1.930.2	MICELLANEOUS GENERAL	12/9/2013	768 - E-470 PUBLIC HIGHWAY AUTHORITY	TOLL FEE - C.LOOK/A.MILLER/K.GIRARD	4.23	0%	-
1.930.2	MICELLANEOUS GENERAL	12/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	57.10	0%	-
1.930.2	MICELLANEOUS GENERAL	12/12/2013	3173 - VERIZON WIRELESS	BOARD IPADS	59.10	0%	-
1.930.2	MICELLANEOUS GENERAL	12/17/2013	3379 - WISEMAN, BOBBI	BOARD MEETING MEAL EXP	197.34	100%	197.34
1.930.2	MICELLANEOUS GENERAL	12/18/2013	1235 - JAMBOREE FOODS	WATER FOR BOARD ROOM	2.81	100%	2.81
1.930.2	MICELLANEOUS GENERAL	12/30/2013	1280 - KEC	DISTRICT 3 MEETING - MGM	57.82	0%	-
1.930.2	MICELLANEOUS GENERAL	12/31/2013	1673 - TMHC SERVICES, INC.	EMPLOYEE TESTING / ADMIN FEES	99.94	0%	-
1.930.2	MICELLANEOUS GENERAL	12/31/2013	2011 - NISC	MONTHLY SUPPORT SERVICES	10.42	0%	-
1.930.2	MICELLANEOUS GENERAL	12/31/2013	3391 - FLEET SERVICES	MONTHLY CARD CHARGE	55.90	0%	-
1.930.2	MICELLANEOUS GENERAL	12/31/2013	FIE	CLEAR OUT 1.237.11	(0.01)	0%	-
1.930.2	MICELLANEOUS GENERAL	12/31/2013	FIE	INSUR - PROPERTY DAMAGE	53.54	0%	-
1.930.2	MICELLANEOUS GENERAL	12/31/2013	FIE	MKEC PROPERTY TAX	2,004.71	0%	-
1.930.2	MICELLANEOUS GENERAL	12/31/2013	FIE	PROPERTY TAX ADJ	(0.01)	0%	-
1.930.2	MICELLANEOUS GENERAL	12/31/2013	LABOR		1,726.71	0%	-
1.930.2	MICELLANEOUS GENERAL	12/31/2013	US BANK CREDIT CARD	AM - DECEMBER MEETING EXPENSES	150.96	0%	-
1.930.2	MICELLANEOUS GENERAL	12/31/2013	US BANK CREDIT CARD	CL - DECEMBER MEETING EXPENSES	107.11	0%	-
1.930.2	MICELLANEOUS GENERAL	12/31/2013	WRIGHT EXPRESS	Fleet Management Transaction	292.05	0%	-
ACCOUNT 1.930.2 - MISC GENERAL					97,926.91		5,007.30

Account	Acct Desc	Date	Ven:	Reference	Debit	Percent Excluded	Total Adjustment
1.930.21	MISC GEN - DUES	1/1/2013	2808 - SMITH CENTER CHAMBER COMMERCE	2013 MEMBERSHIP DUES	250.00	50%	125.00
1.930.21	MISC GEN - DUES	1/1/2013	2896 - STOCKTON CHAMBER OF COMMERCE	2013 MEMBERSHIP DUES	75.00	50%	37.50
1.930.21	MISC GEN - DUES	1/1/2013	3039 - TOUCHSTONE ENERGY COOPERATIVES, INC.	2013 MEMBERSHIP DUES	14,300.00	50%	7,150.00
1.930.21	MISC GEN - DUES	1/2/2013	2069 - NORTON AREA CHAMBER COMMERCE	2013 MEMBERSHIP DUES	390.00	50%	195.00
1.930.21	MISC GEN - DUES	1/8/2013	1280 - KEC	KEC MONTHLY ASSESSMENT DUES	3,655.76	0%	-
1.930.21	MISC GEN - DUES	1/31/2013	155 - BELOIT AREA CHAMBER COMMERCE	2013 MEMBERSHIP DUES	150.00	50%	75.00
1.930.21	MISC GEN - DUES	2/1/2013	1612 - MANKATO CHAMBER OF COMMERCE	2013 MEMBERSHIP DUES	100.00	50%	50.00
1.930.21	MISC GEN - DUES	2/5/2013	1280 - KEC	KEC MONTHLY ASSESSMENT DUES	3,655.76	0%	-
1.930.21	MISC GEN - DUES	3/1/2013	1280 - KEC	KEC MONTHLY ASSESSMENT DUES	3,655.76	0%	-
1.930.21	MISC GEN - DUES	3/1/2013	915 - GLASCO CHAMBER PRIDE	2013 MEMBERSHIP DUES	100.00	50%	50.00
1.930.21	MISC GEN - DUES	3/5/2013	9999 - KANSAS LINE SUPERVISORS ASSOCIATION	2013 MEMBERSHIP DUES	100.00	50%	50.00
1.930.21	MISC GEN - DUES	4/1/2013	1280 - KEC	KEC MO ASSESSMENT DUES	3,655.76	0%	-
1.930.21	MISC GEN - DUES	5/4/2013	1280 - KEC	KEC MO ASSESSMENT DUES	3,655.76	0%	-
1.930.21	MISC GEN - DUES	5/6/2013	1280 - KEC	KEC MO ASSESSMENT	3,655.76	0%	-
1.930.21	MISC GEN - DUES	5/31/2013	2779 - SHRM	2013 MEMBERSHIP DUES	117.00	50%	58.50
1.930.21	MISC GEN - DUES	6/1/2013	2350 - PHILLIPSBURG CHAMBER OF COMM	2013 MEMBERSHIP DUES	162.50	50%	81.25
1.930.21	MISC GEN - DUES	6/5/2013	9999 - KANSAS MANAGER ASSOCIATION	2013 MEMBERSHIP DUES	65.00	50%	32.50
1.930.21	MISC GEN - DUES	6/12/2013	9999 - KANSAS MATERIAL MANAGERS ASSOCIATION	2013 KMMA MEMBERSHIP DUES	32.50	50%	16.25
1.930.21	MISC GEN - DUES	7/1/2013	1280 - KEC	KEC MO ASSESSMENT	3,655.76	0%	-
1.930.21	MISC GEN - DUES	8/6/2013	1280 - KEC	KEC MO ASSESSMENT	3,655.76	0%	-
1.930.21	MISC GEN - DUES	9/4/2013	1280 - KEC	KEC MO ASSESSMENT	3,655.76	0%	-
1.930.21	MISC GEN - DUES	10/1/2013	2815 - SOLOMON VALLEY ECONOMIC	ANNUAL MEMBERSHIP DUES	25.00	50%	12.50
1.930.21	MISC GEN - DUES	10/2/2013	1280 - KEC	KEC MO ASSESSMENT	3,655.76	0%	-
1.930.21	MISC GEN - DUES	10/23/2013	547 - CONCORDIA AREA CHAMBER OF COMM	ANNUAL MEMBERSHIP DUES	921.00	50%	460.50
1.930.21	MISC GEN - DUES	10/28/2013	1324 - KANSAS INDEPENDENT OIL & GAS	ANNUAL MEMBERSHIP DUES	146.25	50%	73.13
1.930.21	MISC GEN - DUES	11/4/2013	1280 - KEC	KEC MO ASSESSMENT	3,655.76	0%	-
1.930.21	MISC GEN - DUES	11/8/2013	1885 - NRECA	MEMBERSHIP DUES	10,312.90	50%	5,156.45
1.930.21	MISC GEN - DUES	12/2/2013	155 - BELOIT AREA CHAMBER COMMERCE	2014 MEMBERSHIP DUES	180.00	50%	90.00
1.930.21	MISC GEN - DUES	12/3/2013	1280 - KEC	KEC MO ASSESSMENT	3,655.76	0%	-
1.930.21	MISC GEN - DUES	12/16/2013	3039 - TOUCHSTONE ENERGY COOPERATIVES, INC.	2014 MEMBERSHIP DUES	14,300.00	50%	7,150.00
ACCOUNT 1.930.21 - DUES					85,596.27		20,863.58

Prairie Land Electric Cooperative, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6b - Detail of Exclusions
For the Historical Test Year Ending December 31, 2013

Account	Acct Desc	Date	Ven:	Reference	Debit	Percent Excluded	Total Adjustment
1.930.3	MISC GEN - DONATIONS	1/1/2013	9999 - PHILLIPSBURG POST PROM	POST FROM DONATION	25.00	50%	12.50
1.930.3	MISC GEN - DONATIONS	1/1/2013	9999 - THUDER RIDGE POST PROM	DONATION - POST PROM	25.00	50%	12.50
1.930.3	MISC GEN - DONATIONS	2/1/2013	9999 - LAKESIDE AFTER PROM COMMITTEE	AFTER PROM DONATION	50.00	50%	25.00
1.930.3	MISC GEN - DONATIONS	2/1/2013	9999 - PHILLIPSBURG POST PROM	AFTER PROM DONATION	25.00	50%	12.50
1.930.3	MISC GEN - DONATIONS	2/1/2013	9999 - THUNDER RIDGE POST PROM	AFTER PROM DONATION	25.00	50%	12.50
1.930.3	MISC GEN - DONATIONS	2/1/2013	9999 - STOCKTON AFTER PROM BASH	AFTER PROM DONATION	32.50	50%	16.25
1.930.3	MISC GEN - DONATIONS	2/1/2013	9999 - CLIFTON-CLYDE AFTER PROM	AFTER PROM DONATION	50.00	50%	25.00
1.930.3	MISC GEN - DONATIONS	2/14/2013	1983 - NEX-TECH	HIGH SCHOOL WRESTLING SPONSOR	48.75	50%	24.38
1.930.3	MISC GEN - DONATIONS	3/1/2013	9999 - SMITH CENTER POST PROM	POST FROM DONATION	50.00	50%	25.00
1.930.3	MISC GEN - DONATIONS	3/1/2013	9999 - LOGAN POST PROM	POST FROM DONATION	50.00	50%	25.00
1.930.3	MISC GEN - DONATIONS	3/15/2013	486 - CLOUD CORP	2013 DONATION	2,000.00	50%	1,000.00
1.930.3	MISC GEN - DONATIONS	3/18/2013	9999 - BOY SCOUTS OF AMERICA - TROOP #38	FLAG DISPLALY SERVICE - FUNDRAISER	35.00	50%	17.50
1.930.3	MISC GEN - DONATIONS	3/31/2013	9999 - PIKE VALLEY AFTER PROM	AFTER PROM DONATION	50.00	50%	25.00
1.930.3	MISC GEN - DONATIONS	3/31/2013	9999 - CLOUD COUNTY FOUNDATION FOR HEALTH CAR	3RD ANNUAL BENEFIT GOLF TOURNAMENT	400.00	50%	200.00
1.930.3	MISC GEN - DONATIONS	4/8/2013	1239 - JEWELL COUNTY 4-H	COUNTY 4-H DONATION	500.00	50%	250.00
1.930.3	MISC GEN - DONATIONS	4/8/2013	1765 - MITCHELL COUNTY 4-H	COUNTY 4-H DONATION	500.00	50%	250.00
1.930.3	MISC GEN - DONATIONS	4/8/2013	2285 - OSBORNE COUNTY 4-H	COUNTY 4-H DONATION	500.00	50%	250.00
1.930.3	MISC GEN - DONATIONS	4/8/2013	2362 - PHILLIPS COUNTY 4-H	COUNTY 4-H DONATION	250.00	50%	125.00
1.930.3	MISC GEN - DONATIONS	4/8/2013	2525 - REPUBLIC COUNTY 4-H	COUNTY 4-H DONATION	500.00	50%	250.00
1.930.3	MISC GEN - DONATIONS	4/8/2013	2608 - ROOKS COUNTY 4-H	COUNTY 4-H DONATION	250.00	50%	125.00
1.930.3	MISC GEN - DONATIONS	4/8/2013	2804 - SMITH COUNTY 4-H	COUNTY 4-H DONATION	500.00	50%	250.00
1.930.3	MISC GEN - DONATIONS	4/8/2013	3223 - WASHINGTON COUNTY 4-H	COUNTY 4-H DONATION	500.00	50%	250.00
1.930.3	MISC GEN - DONATIONS	4/8/2013	474 - CLAY COUNTY 4-H	COUNTY 4-H DONATION	500.00	50%	250.00
1.930.3	MISC GEN - DONATIONS	4/8/2013	489 - CLOUD COUNTY 4-H	COUNTY 4-H DONATION	500.00	50%	250.00
1.930.3	MISC GEN - DONATIONS	4/24/2013	714 - DOWNS CHAMBER OF COMMERCE	ANNUAL CELEBRATION-PURPLE TIER DONATION	300.00	50%	150.00
1.930.3	MISC GEN - DONATIONS	6/10/2013	649 - DISCOVER PHILLIPSBURG	MAIN STREET MEMEBERSHIP	500.00	50%	250.00
1.930.3	MISC GEN - DONATIONS	6/11/2013	9999 - BIG BROTHER BIG SISTERS	TEAM ENTRY FEE	273.00	50%	136.50
1.930.3	MISC GEN - DONATIONS	6/24/2013	9999 - BARB MIZNER	DONATION - ESBON SIGN	300.00	50%	150.00
1.930.3	MISC GEN - DONATIONS	6/25/2013	9999 - PRAIRIE DOG GOLF COURSE	CASH DONATION - GOLF TOURN/FLAG PRIZES	58.50	50%	29.25
1.930.3	MISC GEN - DONATIONS	6/30/2013	9999 - CLIFTON SAL POST 227	CLIFTON JULY 4TH CELEBRATION DONATION	50.00	50%	25.00
1.930.3	MISC GEN - DONATIONS	7/12/2013	9999 - NORTON HORSE COUNCIL C/O GLEN CAMPBELL	RANCH RODEO @ FAIR - DONATION	32.50	50%	16.25
1.930.3	MISC GEN - DONATIONS	8/7/2013	9999 - CLYDE AREA FOUNDATION	DONATION -DUELING PIANO NIGHT FUNDRAISER	50.00	50%	25.00
1.930.3	MISC GEN - DONATIONS	8/8/2013	2444 - CITY OF PRAIRIE VIEW	DONATION - PARTY IN THE PRAIRIE	125.00	50%	62.50
1.930.3	MISC GEN - DONATIONS	8/14/2013	9999 - KCRE	KCRE GOLF OPEN - HOLE SPONSOR	130.00	50%	65.00
1.930.3	MISC GEN - DONATIONS	8/28/2013	9999 - CONCORDIA YOUTH FOOTBALL	CONCORDIA YOUTH FOOTBALL DONATION	35.00	50%	17.50
1.930.3	MISC GEN - DONATIONS	9/1/2013	547 - CONCORDIA AREA CHAMBER OF COMM	DONATION - FALL FEST	200.00	50%	100.00
1.930.3	MISC GEN - DONATIONS	9/6/2013	9999 - CLOUD COUNTY COMMUNITY COLLEGE	BOOSTER CLUB DONATION	300.00	50%	150.00
1.930.3	MISC GEN - DONATIONS	9/9/2013	9999 - SMITH CENTER POST PROM	CK NEVER CASHED, VOID/UNCLAIMED	(25.00)	50%	(12.50)
1.930.3	MISC GEN - DONATIONS	9/10/2013	9999 - CGC BOOSTER CLUB	BOOSTER CLUB CONC GYMNASICS - DONATION	35.00	50%	17.50
1.930.3	MISC GEN - DONATIONS	10/1/2013	2815 - SOLOMON VALLEY ECONOMIC	FUND FOR FUTURE	75.00	50%	37.50
1.930.3	MISC GEN - DONATIONS	10/14/2013	9999 - COLBY COMMUNITY COLLEGE NWKVB ALL-STAIN	NW KANSAS ALL-STAR VOLLEYBALL MATCH	19.50	50%	9.75
1.930.3	MISC GEN - DONATIONS	10/17/2013	9999 - NORTON CITY FIRE	HALLOWEEN PARADE DONATION	32.50	50%	16.25
1.930.3	MISC GEN - DONATIONS	11/15/2013	9999 - CONCORDIA BASEBALL CLUB	ANNUAL DONATION	350.00	50%	175.00
1.930.3	MISC GEN - DONATIONS	12/26/2013	9999 - THUNDER RIDGE POST PROM	AFTER PROM DONATION	50.00	50%	25.00
1.930.3 - DONATIONS					10,257.25		5,128.63

Account	Acct Desc	Date	Ven:	Reference	Debit	Percent Excluded	Total Adjustment
1.930.31	ANNUAL MEETING	1/25/2013	2440 - POSTMASTER	POSTAGE - 2013 ANNUAL MEETING BALLOTS	1,300.00	0%	-
1.930.31	ANNUAL MEETING	2/13/2013	1677 - MICEK, KENNETH	ELECTION & CREDENTIALS COMMITTEE MEETING	109.80	0%	-
1.930.31	ANNUAL MEETING	2/13/2013	3212 - WARD, DAVE	ELECTION & CREDENTIALS COMMITTEE MEETING	78.22	0%	-
1.930.31	ANNUAL MEETING	2/13/2013	9999 - BEACH, CURTIS	ELECTION & CREDENTIALS COMMITTEE MEETING	99.89	0%	-
1.930.31	ANNUAL MEETING	2/22/2013	1280 - KEC	TRUSTEE BALLOT MAILING	7,525.53	0%	-
1.930.31	ANNUAL MEETING	2/27/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	ANNUAL MEETING GIFTS	1,874.52	100%	1,874.52
1.930.31	ANNUAL MEETING	4/1/2013	2011 - NISC	ANNUAL MTG BILL INSERT	411.84	0%	-
1.930.31	ANNUAL MEETING	4/1/2013	823 - F & A FOOD SALES	CREDIT	(27.19)	0%	-
1.930.31	ANNUAL MEETING	4/1/2013	823 - F & A FOOD SALES	ANNUAL MEETING SUPPLIES	185.76	0%	-
1.930.31	ANNUAL MEETING	4/18/2013	2410 - PIZZA HUT OF NORTON	FCCLA SERVERS - GIFT CARDS	97.50	100%	97.50
1.930.31	ANNUAL MEETING	4/18/2013	9999 - NORTON COMMUNITY HIGH SCHOOL	ANNUAL MEETING SERVERS	195.00	0%	-
1.930.31	ANNUAL MEETING	4/22/2013	9999 - PHAT BOY CATERING	ANNUAL MEETING DINNER	3,412.50	0%	-
1.930.31	ANNUAL MEETING	4/29/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	ANNUAL MEETING SUPPLIES	34.27	0%	-
1.930.31	ANNUAL MEETING	4/30/2013	LABOR		2,349.65	0%	-
1.930.31	ANNUAL MEETING	4/30/2013	1235 - JAMBOREE FOODS	SUPPLIES FOR ANNUAL MEETING	79.80	0%	-
1.930.31	ANNUAL MEETING	4/30/2013	1280 - KEC	2013 ANNUAL MEETING NOTICES	6,531.50	0%	-
1.930.31	ANNUAL MEETING	5/1/2013	823 - F & A FOOD SALES	ANNUAL MEETING SUPPLIES	18.70	0%	-
1.930.31	ANNUAL MEETING	5/29/2013	811 - ENDZONE SPORTS & OFFICE SUPPLY	ANNUAL MEETING SUPPLIES	1.05	0%	-
1.930.31	ANNUAL MEETING	5/31/2013	-96.04	R&S PREMIUM BUYDOWN W/ PREPMT	(115.79)	0%	-
1.930.31	ANNUAL MEETING	12/1/2013	2011 - NISC	TRUSTE ELECT INERT	577.07	0%	-
1.930.31	ANNUAL MEETING	12/17/2013	33 - ALEXANDER, A.G.	NOMINATING COMMITTEE MEETING	103.19	0%	-
1.930.31	ANNUAL MEETING	12/17/2013	3405 - ZWEYGARDT, ROGER	NOMINATING COMMITTEE MEETING	142.12	0%	-
1.930.31	ANNUAL MEETING	12/17/2013	47 - AMES, DICK	NOMINATING COMMITTEE MEETING	83.36	0%	-
1.930.31	ANNUAL MEETING	12/17/2013	582 - COURVILLE, DONALD	NOMINATING COMMITTEE MEETING	167.83	0%	-
1.930.31	ANNUAL MEETING	12/17/2013	973 - HANSEN, DENNIS	NOMINATING COMMITTEE MEETING	113.48	0%	-
1.930.31 - ANNUAL MEETING EXP					25,349.60		1,972.02

TOTAL EXCLUSIONS

\$ 56,649

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Revenue Requirement and Rate Calculation
For the Historical Test Year Ending December 31, 2013

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
Line	Description	Source	Unadjusted Historical Test Year [2013]	Adjustments No. Amount	Adjusted Historical Test Year [2013]	Allocation Factor Name	Factor	FBR Revenue Requirement
			Source: WP2			Source: WP3		
1	Operating Expenses							
2	Power Production Expense	WP1, L29, Col (d)	-		\$ -		0.000000	\$ -
3	Cost of Purchased Power	WP1, L30, Col (d)	\$ 34,584,836		\$ 34,584,836		0.000000	\$ -
4	Transmission O&M	WP1, L31, Col (d)	\$ 24,033		\$ 24,033		1.000000	\$ 24,033
5	Distribution Expense-Operation	WP1, L32, Col (d)	\$ 1,198,969	[1] \$ -	\$ 1,198,969	DOM	0.000000	\$ -
6	Distribution Expense-Maintenance	WP1, L33, Col (d)	\$ 840,986	[2] \$ -	\$ 840,986	DOM	0.000000	\$ -
7	Consumer Accounts Expense	WP1, L34, Col (d)	\$ 815,675		\$ 815,675		0.000000	\$ -
8	Customer Service and Informational Expense	WP1, L35, Col (d)	\$ 334,425		\$ 334,425		0.000000	\$ -
9	Sales Expense	WP1, L36, Col (d)	\$ 41		\$ 41		0.000000	\$ -
10	Administration & General	WP1, L37, Col (d)	\$ 1,421,084	[3] \$ (100,952)	\$ 1,320,132	LAB	0.000331	\$ 438
11	Total O&M Expense	Sum (L2:L10)						\$ 24,470
12	Depreciation and Amortization	WP1, L38, Col (d)	\$ 2,238,680	[4] \$ (257,243)	\$ 1,981,438	NP	0.247610	\$ 490,624
13	Property Tax	WP1, L43, Col (d)	\$ -		\$ -	NP	0.247610	\$ -
14	Other Taxes	WP1, L44, Col (d)	\$ -		\$ -	NP	0.247610	\$ -
15	L.T. Interest	WP1, L45, Col (d)	\$ 2,065,015	[5] \$ 291,170	\$ 2,356,185	NP	0.247610	\$ 583,415
16	Interest Charged to Construction - Credit	WP1, L46, Col (d)	\$ -	[6] \$ -	\$ -	NP	0.247610	\$ -
17	Interest-Other	WP1, L47, Col (d)	\$ 42,721	[7] \$ (42,721)	\$ -	NP	0.247610	\$ -
18	Other Deductions	WP1, L48, Col (d)	\$ 27,252	[8] \$ -	\$ 27,252	NP	0.247610	\$ 6,748
19	Total Cost of Electric Service							\$ 1,105,258
20								
21	Margin Requirement							
22	Principal Payments	WP1, L62, Col (d)	\$ 1,268,242	[9] \$ 87,542	\$ 1,355,783	NP	0.24761013	\$ 335,706
23	L.T. Interest	L15	\$ 2,065,015	\$ 291,170	\$ 2,356,185	NP	0.24761013	\$ 583,415
24	Subtotal	Sum (L22:23)						\$ 583,415 \$ 919,121
25	Required Coverage Ratio	WP1, L64, Col (d)						1.80 1.80
26	Gross Margin Requirements	L24 x L25						1,050,148 1,654,418
27	Less: Offsets to Margin Requirements	WP4, L4 or L11, Col (i)						584,270 1,087,401
28	Net Margin Requirement	L26 - L27						\$ 465,878 \$ 567,017
29								
30	Total Revenue Requirements							
31	Using the greater of OTIER or MDSC Margin Requirements	L19 + L28						\$1,672,275
32	Divided By Total (Retail and Wholesale) Billing Demand	WP5, L25, Col (Total)						1,049,690 kW
33	Resultant Unit Rate	L31 / L32						\$1.59/kW-mo.

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 1 - Input Data
For the Historical Test Year Ending December 31, 2013

Line No	Description	Source (b)	(c)	Amount (d)	(e)	Notes (f)
1	A. Net Plant in Service			As of December 31, 2013		
2				Plant in Service	Accum. Res. for Depr.	
3	1. Facilities Used to Provide Local Access Delivery Service					
4	Transmission Facilities					
5	350 Land and Land Rights	Trial Balance		\$ 174,745		
6	352 Structures and Improvements	Trial Balance		\$ 717,056		
7	353 Station Equipment	Trial Balance		\$ 5,414,848		
8	355 Poles and Fixtures	Trial Balance		\$ 5,644,257		
9	356 O.H. Conductors and Devices	Trial Balance		\$ 5,021,454		
10	358 U.G. Conductors and Devices	Trial Balance		\$ -		
11	Subtotal	Sum(L5:L10)		\$ 16,972,360	\$ 6,078,579	GL acct 108.5
12	Distribution Facilities (If Applicable)					
13	360 Land and Land Rights	Company Direct Assessment		N/A	N/A	
14	361 Structures and Improvements	Company Direct Assessment		N/A	N/A	
15	362 Station Equipment	Company Direct Assessment		N/A	N/A	
16	Subtotal	L13 + L15		\$ -	\$ -	
17	Total	L11 + L16		\$ 16,972,360	\$ 6,078,579	
18						
19	2. All Facilities					
20	301-301 Intangible Plant	Trial Balance		-	-	
21	350-359 Transmission Plant	Trial Balance		\$ 16,972,360	\$ 6,078,579	GL acct 108.5
22	360-373 Distribution Plant	Trial Balance		\$ 47,890,742	\$ 19,642,031	GL acct. 108.6,108.61
23	389-399 General Plant	Trial Balance		\$ 6,591,321	\$ 1,731,609	GL acct. 108.7-108.78
24	Total			\$ 71,454,423	\$ 27,452,219	
25						
26						
27						
28	B. Operating Expenses			Historical Test Year 2013	Budget Year 2014	
29	Power Production Expense	Statement of Operations		\$ -		
30	Cost of Purchased Power	Statement of Operations		\$ 34,584,836		
31	Transmission O&M	Statement of Operations		\$ 24,033		
32	Distribution Expense-Operation	Statement of Operations		\$ 1,198,969		
33	Distribution Expense-Maintenance	Statement of Operations		\$ 840,986		
34	Consumer Accounts Expense	Statement of Operations		\$ 815,675		
35	Customer Service and Informational Expense	Statement of Operations		\$ 334,425		
36	Sales Expense	Statement of Operations		\$ 41		
37	Administrative and General	Statement of Operations		\$ 1,421,084		
38	Depreciation and Amortization	Statement of Operations		\$ 2,238,680	\$ 2,344,657	
39	Depreciation Expense - Distribution	Trial Balance		\$ 1,364,649		
40	Depreciation Expense - Transmission	Trial Balance		\$ 370,945		
41	Depreciation Expense - General Plant	Trial Balance		\$ 139,867		
42	Amortization of AP (booked within Depreciation Expense)	Trial Balance		\$ 363,219		
43	Property Tax	Statement of Operations		\$ -		
44	Other Taxes	Statement of Operations		\$ -		
45	L.T. Interest	Statement of Operations		\$ 2,065,015	\$ 2,356,185	
46	Interest Charged to Construction - Credit	Statement of Operations		\$ -	\$ -	
47	Interest-Other	Statement of Operations		\$ 42,721	\$ -	
48	Other Deductions	Statement of Operations		\$ 27,252		
49						
50	C. Payroll					Part of GL acct
51	Transmission	Payroll Journal (Labor Amt)		\$ 109		560-573
52	Distribution	Payroll Journal (Labor Amt)		\$ 239,350		580-598
53	Customer Accounting	Payroll Journal (Labor Amt)		\$ 63,301		901-905
54	Customer Service and Information	Payroll Journal (Labor Amt)		\$ 26,131		907-910
55	Sales	Payroll Journal (Labor Amt)		\$ -		911-916
56	Administration and General	Payroll Journal (Labor Amt)		\$ 7,075		920-932
57	Total			\$ 335,966		Non-capitalized items
58						
59						
60	D. Miscellaneous			Prior Year 2012	Historical Test Year 2013	Budget Year 2014
61	1. Debt Service					Source/Notes
62	Principal Payments	Supplementary Company Records		\$ 1,268,242	\$ 1,355,783	Per Company records.
63						
64	2. Target OTIER/MDSC	As approved by Commission		1.80		Proposed value in this year's filing
65						
66	3. Margin Requirement Offsets					
67	Investment in Associate Organizations - Patronage Capital	Balance Sheet	\$ 173,634	\$ 177,086		
68	Generation & Transmission Capital Credits	Statement of Operations		\$ -		
69	Other Capital Credits and Patronage Dividends	Statement of Operations		\$ 10,102		
70	Non-Operating Margins - Interest	Statement of Operations		\$ 47,310		
71	Cash Received from G&T/Lenders	Supplementary Company Records		\$ 3,452		Net for GL acct. 124.14

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 2 - Adjustments To Historical Test Year Expenses
For the Historical Test Year Ending December 31, 2013

<u>Line No</u>	<u>Type</u>	<u>Source</u>	<u>Amount</u>	<u>Notes</u>
1	1. Adjustment to Distribution Operations Expense per K.S.A. 66-101f(a), if any:			
2	Applicable Disallowance - Distribution Operations	WP6	\$ -	not applicable
3	Total Adjustment	L2	<u>\$ -</u>	
4				
5	2. Adjustment to Distribution Maintenance Expense per K.S.A. 66-101f(a), if any:			
6	Applicable Disallowance - Distribution Maintenance	WP6	\$ -	not applicable
7	Total Adjustment	L6	<u>\$ -</u>	
8				
9	3. Adjustment to Administrative & General per K.S.A. 66-101f(a), if any:			
10	Applicable Disallowance - A&G	WP6	\$ (100,952)	
11	Total Adjustment	L10	<u>\$ (100,952)</u>	
12				
13	4. Adjustment to Depreciation Expense			
14	Historical Amount	Pg.1, L12, Col (d)	\$ 2,238,680	
15	Projected	WP1, L38, Col (e)	<u>\$ 2,344,657</u>	
16	Subtotal Adjustment	L15 - L14	\$ 105,976	
17	Less: Amortization of AP	WP1, L42, Col (d)	\$ 363,219	amortization of AP is constant
18	Total Adjustment	L16 - L17	<u>\$ (257,243)</u>	
19				
20	5. Adjustment to LT Interest			
21	Historic Amount	Pg.1, L15, Col (d)	\$ 2,065,015	
22	Projected Amount	WP1, L45, Col (e)	<u>\$ 2,356,185</u>	
23	Total Adjustment	L22 - L21	<u>\$ 291,170</u>	
24				
25	6. Adjustment to Interest Charged To Construction			
26	Historical Amount	Pg.1, L16, Col (d)	\$ -	
27	Projected Amount	WP1, L46, Col (e)	<u>\$ -</u>	
28	Total Adjustment	L27 - L26	<u>\$ -</u>	
29				
30	7. Adjustment to Interest-Other			
31	Historical Amount	Pg.1, L17, Col (d)	\$ 42,721	
32	Projected Amount	WP1, L47, Col (e)	<u>\$ -</u>	
33	Total Adjustment	L32 - L31	<u>\$ (42,721)</u>	
34				
35	8. Adjustment to Other Deductions per K.S.A. 66-101f(a), if any:			
36	Applicable Disallowance - Other Deductions	WP6	\$ -	
37	Total Adjustment	L36	<u>\$ -</u>	
38				
39	9. Adjustment to Principal Payments			
40	Historical Amount	Pg.1, L22, Col (a)	\$ 1,268,242	
41	Projected Amount	WP1, L62, Col (e)	<u>\$ 1,355,783</u>	
42	Total Adjustment	L41 - L40	<u>\$ 87,542</u>	

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 3 - Allocation Factors
For the Historical Test Year Ending December 31, 2013

<u>Line No.</u>	<u>Description</u>	<u>Source</u>	<u>Allocator</u>	<u>Amount</u>
1	Distribution O&M Allocation Factor			
2	Distr. Plant used to provide Local Access Delivery Service	WP1, L16, Col (d)		\$ -
3	Total Distribution Plant	WP1, L22, Col (d)		\$ 47,890,742
4				
5	Allocation Factor	L2 / L3	DOM	-
6				
7	Labor Allocation Factor			
8	Transmission Wages	WP1, L51, Col (d)		\$ 109
9	Allocated Distribution Wages			
10	Total Distribution Wages	WP1, L52, Col (d)		\$ 239,350
11	Allocation Factor	L5	DOM	\$ -
12		L10 * L11		\$ -
13	Total LAC Wages	L8 + L12		<u>\$ 109</u>
14				
15	Total Wages Other than A&G			
16	Total Wages	WP1, L57, Col (d)		\$ 335,966
17	Less: Administration & General Wages	WP1, L56, Col (d)		<u>7,075</u>
18		L16 - L17		\$ 328,891
19				
20	Transmission Labor Allocator	L13 / L18	LAB	<u>0.000331</u>
21				
22	Net Plant Allocation Factor			
23	Plant-in-Service			
24	Transmission	WP1, L11, Col (d)		\$ 16,972,360
25	Distr. used to provide Local Access Service	L2		\$ -
26	General Plant			
27	Total General Plant	WP1, L23, Col (d)		\$ 6,591,321
28	Allocation Factor	L20	LAB	0.000331
29		L27 * L28		<u>\$ 2,184</u>
30	Total LAC Plant-in-Service	L24 + L25 + L29		<u>\$ 16,974,545</u>
31				
32	Accumulated Reserves for Depreciation			
33	Transmission	WP1, L11, Col (e)		\$ 6,078,579
34	Distribution Used in LAC	WP1, L16, Col (e)		\$ -
35	Allocated General Plant			
36	Total General Plant	WP1, L23, Col (e)		\$ 1,731,609
37	Allocation Factor	L20	LAB	0.000331
38		L36 * L37		<u>\$ 574</u>
39	Total LAC Accum. Depr. Res.	L33 + L34 + L38		<u>\$ 6,079,153</u>
40				
41	Net Plant Used in LAC	L30 - L39		<u>\$ 10,895,391</u>
42				
43	Total Plant in Service	WP1, L24, Col (e)		\$ 71,454,423
44	Less: Total Accum. Reserves for Depr.	WP1, L24, Col (e)		<u>\$ 27,452,219</u>
45	Total Net Plant	L43 - L44		<u>\$ 44,002,203</u>
46				
47	Transmission Net Plant Allocator	L41 / L45	NP	<u>0.247610</u>

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 4 - Margin Requirement Offsets
For the Historical Test Year Ending December 31, 2013

(a) Line No	(b) Metric	(c) Source	(d) Historical Tot Amount	(e) Adjustment pg 1, Col (e)	(f) Adjusted Amount	(g) Allocation Factor Name	(h) Allocation Factor Factor	(i) Allocated to FBR
1	OTIER							
2	LT Interest Expense	Pg.1, L15, Col (d)	\$ 2,065,015	\$ 291,170	\$ 2,356,185	NP	0.24761013	\$ 583,415
3	Cash Received from G&T/lenders	WP1, Col (d), L71	\$ 3,452	\$ -	\$ 3,452	NP	0.24761013	\$ 855
4			<u>\$ 2,068,467</u>	<u>\$ 291,170</u>	<u>\$ 2,359,637</u>			<u>\$ 584,270</u>
5								
6	MDSC							
7	LT Interest Expense	L2	\$ 2,065,015	\$ 291,170	\$ 2,356,185	NP	0.24761013	\$ 583,415
8	Depreciation Expense	Pg.1, L12, Col (d)	\$ 2,238,680	\$ (257,243)	\$ 1,981,438	NP	0.24761013	\$ 490,624
9	Non-Operating Margins - Interest	WP1, L70, Col (d)	\$ 47,310	\$ -	\$ 47,310	NP	0.24761013	\$ 11,715
10	Cash Patronage Capital*	L18	\$ 6,651	\$ -	\$ 6,651	NP	0.24761013	\$ 1,647
11	Resultant Amount	Sum (L7:L10)	<u>\$ 4,357,657</u>		<u>\$ 4,391,584</u>			<u>\$ 1,087,401</u>
12								
13	*Calculate Pat. Cap. (Cash):							
14	Inv. in Assoc. Org. - Patr. Capital - Current Yr.	WP1, L67, Col (d)	\$ 177,086					
15	Inv. in Assoc. Org. - Patr. Capital - Prior Yr.	WP1, L67, Col (c)	\$ 173,634					
16	Generation & Transmission Capital Credits	WP1, L68, Col (d)	\$ -					
17	Other Capital Cr. and Patronage Dividends	WP1, L69, Col (d)	<u>\$ 10,102</u>					
18	Resultant Amount	L15 + L16 + L17 - L14	<u>\$ 6,651</u>					

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 5 - Billing Demand
For the Historical Test Year Ending December 31, 2013

<u>Line</u>	<u>Description</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Total</u>
1	Total Local Access System	71,489	70,674	68,758	76,550	94,304	125,147	121,542	107,514	101,073	85,416	74,111	74,315	1,070,893
2	CP Date	24	01	25	30	28	27	22	02	07	03	21	20	
3	CP Time (hour Ending)	1200	1000	1000	1600	1600	1400	1600	1600	1600	1600	1900	1100	
4														
5	Wholesale Customers @ Del. Pt.													
6	Dairy-Sunflower	247	334	256	368	299	712	620	619	602	639	477	374	5,545
7	Cimmaron	2,121	1,984	1,950	2,544	3,331	4,829	4,724	4,318	4,643	3,097	2,344	2,330	38,217
8	Montezuma	1,302	1,531	1,288	1,317	1,784	2,717	2,644	2,381	2,262	2,073	1,527	1,569	22,395
9	KEPCO	18,045	17,902	17,607	17,697	24,624	30,068	29,750	26,279	16,907	14,448	18,075	17,978	249,380
10	Subtotal	21,715	21,751	21,100	21,927	30,039	38,326	37,738	33,597	24,413	20,258	22,423	22,251	315,538
11	Losses @ 2.02% of 34.5 kV Output	439	439	426	443	607	774	762	679	493	409	453	449	6,374
12	Subtotal with Losses (@ Source)	22,153	22,190	21,526	22,370	30,645	39,100	38,500	34,276	24,907	20,667	22,876	22,700	321,912
13														
14	Victory Retail													
15	Retail with Losses (@ Source)	49,336	48,484	47,231	54,180	63,659	86,047	83,042	73,238	76,166	64,749	51,235	51,615	748,982
16	Losses @ 1.98% of 34.5 kV Input	977	960	935	1,073	1,260	1,704	1,644	1,450	1,508	1,282	1,014	1,022	14,830
17	Retail @ Delivery Point	48,359	47,524	46,296	53,108	62,399	84,343	81,398	71,788	74,658	63,467	50,220	50,593	734,152
18														
19														
20														
21														
22														
23														
24														
25	Total Load (wholesale at source before loss + retail @ delivery pt.)													1,049,690

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6a - Summary of Exclusions
For the Historical Test Year Ending December 31, 2013

<u>Acct</u>	<u>Excluded</u> <u>Amount</u>
921	\$ (5,871)
930	\$ (95,082)
	<u>\$ (100,952)</u>

Victory Electric Cooperative Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6b - Detail of Exclusions
For the Historical Test Year Ending December 31, 2013

Acct	Description	Date*	Vendor*	Reference*	GL Amount Eligible for Exclusion*	Percentage Excluded*	Excluded Amount
921.11	Food				\$ 4,084	100%	\$ 4,084
921.12	Holiday decorations				\$ 763	100%	\$ 763
921.13	Supplies/food-meetings				\$ 1,023	100%	\$ 1,023
930.1	General Advertising Expense				\$ 23,550	100%	\$ 23,550
930.11	Give Aways				\$ 13,968	100%	\$ 13,968
930.2	Misc General Exp- Miscellaneous				\$ 128,946	direct	\$ 29,002
930.21	Misc General Exp - Directors Fee				\$ 160,936	direct	\$ 11,691
930.23	Misc General Expense - Local, State				\$ 10,379	direct	\$ 5,190
930.24	Misc General Exp - Annual Meeting				\$ 78,544	direct	\$ 6,517
930.27	Misc General - Holiday Decorations				\$ 3,094	100%	\$ 3,094
930.3	Employee Birthday Expense				\$ 196	100%	\$ 196
930.4	Sponsorship of Employee Activities				\$ 3,750	50%	\$ 1,875
							<u>\$ 100,952</u>

*Note: Combined multiple entries. Due to voluminous size (exceeds 50 printed pages), transaction-specific detail can be made available in a separate Excel file.

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Revenue Requirement and Rate Calculation
For the Historical Test Year Ending December 31, 2013

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
Line			Unadjusted		Adjusted			FBR
No	Description	Source	Historical Test Year [2013]	Adjustments No. Amount	Historical Test Year [2013]	Allocation Factor Name Factor		Revenue Requirement
				Source: WP2		Source: WP3		
1	Operating Expenses							
2	Power Production Expense	WP1, L29, Col (d)	-		\$ -	0.000000	\$	-
3	Cost of Purchased Power	WP1, L30, Col (d)	\$ 13,391,092		\$ 13,391,092	0.000000	\$	-
4	Transmission O&M	WP1, L31, Col (d)	\$ 200,096		\$ 200,096	1.000000	\$	200,096
5	Distribution Expense-Operation	WP1, L32, Col (d)	\$ 1,019,744	[1] \$ -	\$ 1,019,744	DOM	0.000000	\$ -
6	Distribution Expense-Maintenance	WP1, L33, Col (d)	\$ 808,144	[2] \$ -	\$ 808,144	DOM	0.000000	\$ -
7	Consumer Accounts Expense	WP1, L34, Col (d)	\$ 360,943		\$ 360,943		0.000000	\$ -
8	Customer Service and Informational Expense	WP1, L35, Col (d)	\$ 131,506		\$ 131,506		0.000000	\$ -
9	Sales Expense	WP1, L36, Col (d)	\$ -		\$ -		0.000000	\$ -
10	Administration & General	WP1, L37, Col (d)	\$ 939,074	[3] \$ (19,055)	\$ 920,019	LAB	0.010913	\$ 10,040
11	Total O&M Expense	Sum (L2-L10)						\$ 210,136
12	Depreciation and Amortization	WP1, L38, Col (d)	\$ 857,249	[4] \$ (56,875)	\$ 800,374	NP	0.239323	\$ 191,548
13	Property Tax	WP1, L43, Col (d)	\$ -		\$ -	NP	0.239323	\$ -
14	Other Taxes	WP1, L44, Col (d)	\$ -		\$ -	NP	0.239323	\$ -
15	L.T. Interest	WP1, L45, Col (d)	\$ 574,355	[5] \$ 327,504	\$ 901,859	NP	0.239323	\$ 215,836
16	Interest Charged to Construction - Credit	WP1, L46, Col (d)	\$ -	[6] \$ -	\$ -	NP	0.239323	\$ -
17	Interest-Other	WP1, L47, Col (d)	\$ -	[7] \$ -	\$ -	NP	0.239323	\$ -
18	Other Deductions	WP1, L48, Col (d)	\$ -	[8] \$ -	\$ -	NP	0.239323	\$ -
19	Total Cost of Electric Service							\$ 617,520
20								
21	Margin Requirement							
22	Principal Payments	WP1, L62, Col (d)	\$ 472,654	[9] \$ 33,388	\$ 506,042	NP	0.23932322	\$ 121,108
23	L.T. Interest	L15	\$ 574,355	\$ 327,504	\$ 901,859	NP	0.23932322	\$ 215,836
24	Subtotal	Sum (L22-23)						\$ 336,943
25	Required Coverage Ratio	WP1, L64, Col (d)						1.80
26	Gross Margin Requirements	L24 x L25						388,504
27	Less: Offsets to Margin Requirements	WP4, L4 or L11, Col (i)						215,836
28	Net Margin Requirement	L26 - L27						\$ 172,669
29								\$ 199,228
30	Total Revenue Requirements							
31	Using the greater of OTIER or MDSC Margin Requirements	L19 + L28						\$816,748
32	Divided By Total (Retail and Wholesale) Billing Demand	WP5, L30, Col (Total)						758,036 kW
33	Resultant Unit Rate	L31 / L32						\$1.08/kW-mo.

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 1 - Input Data
Historical Test Year Ending December 31, 2013

Line No	Description	Source	(b)	(c)	Amount	(d)	(e)	Notes	(f)
					As of December 31, 2013				
					Plant in Service	Accum. Res. for Depr.			
1	A. Net Plant in Service								
2									
3	1. Facilities Used to Provide Local Access Delivery Service								
4	Transmission Facilities								
5	350 Land and Land Rights	Trial Balance			\$	38,031			
6	352 Structures and Improvements	Trial Balance			\$	243,432			
7	353 Station Equipment	Trial Balance			\$	3,736,858			
8	355 Poles and Fixtures	Trial Balance			\$	2,720,392			
9	356 O.H. Conductors and Devices	Trial Balance			\$	2,886,946			
10	358 U.G. Conductors and Devices	Trial Balance			\$	-			
11	Subtotal	Sum(L5:L10)			\$	9,625,658	\$	5,778,312	GL acct 108.5
12	Distribution Facilities (If Applicable)								
13	360 Land and Land Rights	Company Direct Assessment				N/A		N/A	
14	361 Structures and Improvements	Company Direct Assessment				N/A		N/A	
15	362 Station Equipment	Company Direct Assessment				N/A		N/A	
16	Subtotal	L13 + L15			\$	-	\$	-	
17	Total	L11 + L16			\$	9,625,658	\$	5,778,312	
18									
19	2. All Facilities								
20	301-301 Intangible Plant	Trial Balance				-		-	
21	350-359 Transmission Plant	Trial Balance			\$	9,625,658	\$	5,778,312	GL acct 108.5
22	360-373 Distribution Plant	Trial Balance			\$	17,703,340	\$	8,224,835	GL acct. 108.6,108.61
23	389-399 General Plant	Trial Balance			\$	3,946,067	\$	1,064,584	GL acct. 108.7-108.78
24	Total				\$	31,275,066	\$	15,067,731	
25									
26									
27									
28	B. Operating Expenses								
29	Power Production Expense	Statement of Operations			\$	-			
30	Cost of Purchased Power	Statement of Operations			\$	13,391,092			
31	Transmission O&M	Statement of Operations			\$	200,096			
32	Distribution Expense-Operation	Statement of Operations			\$	1,019,744			
33	Distribution Expense-Maintenance	Statement of Operations			\$	808,144			
34	Consumer Accounts Expense	Statement of Operations			\$	360,943			
35	Customer Service and Informational Expense	Statement of Operations			\$	131,506			
36	Sales Expense	Statement of Operations			\$	-			
37	Administrative and General	Statement of Operations			\$	939,074			
38	Depreciation and Amortization	Statement of Operations			\$	857,249	\$	919,494	
39	Depreciation Expense - Distribution	Trial Balance			\$	459,327			
40	Depreciation Expense - Transmission	Trial Balance			\$	205,426			
41	Depreciation Expense - General Plant	Trial Balance			\$	73,375			
42	Amortization of AP (booked within Depreciation Expense)	Trial Balance			\$	119,121			
43	Property Tax	Statement of Operations			\$	-			
44	Other Taxes	Statement of Operations			\$	-			
45	L.T. Interest	Statement of Operations			\$	574,355	\$	901,859	
46	Interest Charged to Construction - Credit	Statement of Operations			\$	-	\$	-	
47	Interest-Other	Statement of Operations			\$	-	\$	-	
48	Other Deductions	Statement of Operations			\$	-			
49									
50	C. Payroll								Part of GL acct
51	Transmission	Payroll Journal (Labor Amt)			\$	8,936			560-573
52	Distribution	Payroll Journal (Labor Amt)			\$	620,021			580-598
53	Customer Accounting	Payroll Journal (Labor Amt)			\$	189,915			901-905
54	Customer Service and Information	Payroll Journal (Labor Amt)							907-910
55	Sales	Payroll Journal (Labor Amt)			\$	-			911-916
56	Administration and General	Payroll Journal (Labor Amt)			\$	400,676			920-932
57	Total				\$	1,219,549			Non-capitalized items
58									
59									
60	D. Miscellaneous								
61	1. Debt Service								
62	Principal Payments	Supplementary Company Records			\$	472,654	\$	506,042	Per Company records.
63									
64	2. Target OTIER/MDSC	As approved by Commission				1.80			Proposed value in this year's filing
65									
66	3. Margin Requirement Offsets								
67	Investment in Associate Organizations - Patronage Capital	Balance Sheet	\$	-	\$	813			
68	Generation & Transmission Capital Credits	Statement of Operations			\$	-			
69	Other Capital Credits and Patronage Dividends	Statement of Operations			\$	-			
70	Non-Operating Margins - Interest	Statement of Operations			\$	337			
71	Cash Received from G&T/Lenders	Supplementary Company Records			\$	-			detail from CFO

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 2 - Adjustments To Historical Test Year Expenses
Historical Test Year Ending December 31, 2013

Line No	Type	Source	Amount	Notes
1	1. Adjustment to Distribution Operations Expense per K.S.A. 66-101f(a), if any:			
2	Applicable Disallowance - Distribution Operations	WP6	\$ -	not applicable
3	Total Adjustment	L2	<u>\$ -</u>	
4				
5	2. Adjustment to Distribution Maintenance Expense per K.S.A. 66-101f(a), if any:			
6	Applicable Disallowance - Distribution Maintenance	WP6	\$ -	not applicable
7	Total Adjustment	L6	<u>\$ -</u>	
8				
9	3. Adjustment to Administrative & General per K.S.A. 66-101f(a), if any:			
10	Applicable Disallowance - A&G	WP6	\$ (19,055)	
11	Total Adjustment	(L10)	<u>\$ (19,055)</u>	
12				
13	4. Adjustment to Depreciation Expense			
14	Historical Amount	Pg.1, L12, Col (d)	\$ 857,249	
15	Projected	WP1, L38, Col (e)	\$ 919,494	
16	Subtotal Adjustment	L15 - L14	\$ 62,245	
17	Less: Amortization of AP	WP1, L42, Col (d)	\$ 119,121	amortization of AP is constant
18	Total Adjustment	L16 - L17	<u>\$ (56,875)</u>	
19				
20	5. Adjustment to LT Interest			
21	Historic Amount	Pg.1, L15, Col (d)	\$ 574,355	
22	Projected Amount	WP1, L45, Col (e)	\$ 901,859	
23	Total Adjustment	L22 - L21	<u>\$ 327,504</u>	
24				
25	6. Adjustment to Interest Charged To Construction			
26	Historical Amount	Pg.1, L16, Col (d)	\$ -	
27	Projected Amount	WP1, L46, Col (e)	\$ -	
28	Total Adjustment	L27 - L26	<u>\$ -</u>	
29				
30	7. Adjustment to Interest-Other			
31	Historical Amount	Pg.1, L17, Col (d)	\$ -	
32	Projected Amount	WP1, L47, Col (e)	\$ -	
33	Total Adjustment	L32 - L31	<u>\$ -</u>	
34				
35	8. Adjustment to Other Deductions per K.S.A. 66-101f(a), if any:			
36	Applicable Disallowance - Other Deductions	WP6	\$ -	
37	Total Adjustment	L36	<u>\$ -</u>	
38				
39	9. Adjustment to Principal Payments			
40	Historical Amount	Pg.1, L22, Col (a)	\$ 472,654	
41	Projected Amount	WP1, L62, Col (e)	\$ 506,042	
42	Total Adjustment	L41 - L40	<u>\$ 33,388</u>	

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 3 - Allocation Factors
Historical Test Year Ending December 31, 2013

<u>Line No.</u>	<u>Description</u>	<u>Source</u>	<u>Allocator</u>	<u>Amount</u>
1	Distribution O&M Allocation Factor			
2	Distr. Plant used to provide Local Access Delivery Service	WP1, L16, Col (d)		\$ -
3	Total Distribution Plant	WP1, L22, Col (d)		\$ 17,703,340
4				
5	Allocation Factor	L2 / L3	DOM	-
6				
7	Labor Allocation Factor			
8	Transmission Wages	WP1, L51, Col (d)		\$ 8,936
9	Allocated Distribution Wages			
10	Total Distribution Wages	WP1, L52, Col (d)		\$ 620,021
11	Allocation Factor	L5	DOM	\$ -
12		L10 * L11		\$ -
13	Total LAC Wages	L8 + L12		<u>\$ 8,936</u>
14				
15	Total Wages Other than A&G			
16	Total Wages	WP1, L57, Col (d)		\$ 1,219,549
17	Less: Administration & General Wages	WP1, L56, Col (d)		400,676
18		L16 - L17		<u>\$ 818,872</u>
19				
20	Transmission Labor Allocator	L13 / L18	LAB	<u>0.010913</u>
21				
22	Net Plant Allocation Factor			
23	Plant-in-Service			
24	Transmission	WP1, L11, Col (d)		\$ 9,625,658
25	Distr. used to provide Local Access Service	L2		\$ -
26	General Plant			
27	Total General Plant	WP1, L23, Col (d)		\$ 3,946,067
28	Allocation Factor	L20	LAB	0.010913
29		L27 * L28		<u>\$ 43,063</u>
30	Total LAC Plant-in-Service	L24 + L25 + L29		<u>\$ 9,668,721</u>
31				
32	Accumulated Reserves for Depreciation			
33	Transmission	WP1, L11, Col (e)		\$ 5,778,312
34	Distribution Used in LAC	WP1, L16, Col (e)		\$ -
35	Allocated General Plant			
36	Total General Plant	WP1, L23, Col (e)		\$ 1,064,584
37	Allocation Factor	L20	LAB	0.010913
38		L36 * L37		\$ 11,618
39	Total LAC Accum. Depr. Res.	L33 + L34 + L38		<u>\$ 5,789,930</u>
40				
41	Net Plant Used in LAC	L30 - L39		<u>\$ 3,878,791</u>
42				
43	Total Plant in Service	WP1, L24, Col (e)		\$ 31,275,066
44	Less: Total Accum. Reserves for Depr.	WP1, L24, Col (e)		\$ 15,067,731
45	Total Net Plant	L43 - L44		<u>\$ 16,207,335</u>
46				
47	Transmission Net Plant Allocator	L41 / L45	NP	<u>0.239323</u>

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 4 - Margin Requirement Offsets
Historical Test Year Ending December 31, 2013

(a) Line No	(b) Metric	(c) Source	(d) Historical Tot Amount	(e) Adjustment pg 1, Col (e)	(f) Adjusted Amount	(g) Allocation Name	(h) Allocation Factor	(i) Allocated to FBR
1	OTIER							
2	LT Interest Expense	Pg.1, L15, Col (d)	\$ 574,355	\$ 327,504	\$ 901,859	NP	0.239323216	\$ 215,836
3	Cash Received from G&T/lenders	WP1, Col (d), L71	\$ -	\$ -	\$ -	NP	0.239323216	\$ -
4			<u>\$ 574,355</u>	<u>\$ 327,504</u>	<u>\$ 901,859</u>			<u>\$ 215,836</u>
5								
6	MDSC							
7	LT Interest Expense	L2	\$ 574,355	\$ 327,504	\$ 901,859	NP	0.239323216	\$ 215,836
8	Depreciation Expense	Pg.1, L12, Col (d)	\$ 857,249	\$ (56,875)	\$ 800,374	NP	0.239323216	\$ 191,548
9	Non-Operating Margins - Interest	WP1, L70, Col (d)	\$ 337	\$ -	\$ 337	NP	0.239323216	\$ 81
10	Cash Patronage Capital*	L18	\$ (813)	\$ -	\$ (813)	NP	0.239323216	\$ (195)
11	Resultant Amount	Sum (L7:L10)	<u>\$ 1,431,128</u>		<u>\$ 1,701,756</u>			<u>\$ 407,270</u>
12								
13	*Calculate Pat. Cap. (Cash):							
14	Inv. in Assoc. Org. - Patr. Capital - Current Yr.	WP1, L67, Col (d)	\$ 813					
15	Inv. in Assoc. Org. - Patr. Capital - Prior Yr.	WP1, L67, Col (c)	\$ -					
16	Generation & Transmission Capital Credits	WP1, L68, Col (d)	\$ -					
17	Other Capital Cr. and Patronage Dividends	WP1, L69, Col (d)	\$ -					
18	Resultant Amount	L15 + L16 + L17 - L14	<u>\$ (813)</u>					

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 5 - Billing Demand
Historical Test Year Ending December 31, 2013

<u>Line</u>	<u>Description</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Total</u>
1	Total Local Access System ¹	54,667	54,117	54,035	53,505	63,531	83,606	79,303	78,850	73,636	60,181	55,493	60,074	770,999
2	CP Date	24	21	25	10	28	27	09	29	10	02	22	09	
3	CP Time (hour Ending)	1100	1200	800	1100	1700	1500	1700	1600	1500	1900	1100	2000	
4														
5	Wholesale Customers @ Del. Pt.													
6	Hoisington (KMEA)--Metered	2,884	2,858	1,742	2,822	4,454	6,083	6,147	5,816	5,546	(1,370)	2,897	3,476	43,352
7	Hoisington (KMEA)--Generation	-	-	998	-	-	-	-	-	-	5,529	-	-	6,527
8	Subtotal--Hoisington	2,884	2,858	2,740	2,822	4,454	6,083	6,147	5,816	5,546	4,159	2,897	3,476	49,879
9	Lincoln (KMEA)--Metered	2,510	1,916	2,154	1,940	2,629	3,952	3,396	4,178	3,619	(425)	2,689	2,331	30,889
10	Lincoln (KMEA)--Generation	-	-	-	-	-	-	-	-	-	3,028	-	-	3,028
11	Subtotal--Lincoln	2,510	1,916	2,154	1,940	2,629	3,952	3,396	4,178	3,619	2,604	2,689	2,331	33,917
12	Russell (KMEA)--Metered	13,955	15,085	14,730	14,883	19,516	20,786	22,243	22,388	6,741	(823)	15,605	17,014	182,121
13	Russell (KMEA)--Generation	-	-	-	-	-	2,954	-	-	12,648	18,701	-	-	34,304
14	Subtotal--Russell	13,955	15,085	14,730	14,883	19,516	23,740	22,243	22,388	19,389	17,878	15,605	17,014	216,424
15	Holyrood (KPP)	479	490	400	403	609	1,059	932	956	872	612	476	538	7,825
16	Lucas (KPP)	939	783	910	944	1,059	1,384	1,377	1,362	1,035	1,051	958	877	12,676
17	Luray (KPP)	221	217	210	212	298	502	458	404	428	277	196	264	3,685
18	KEPCO	4,503	4,768	4,205	4,167	4,911	7,301	6,727	6,262	7,149	4,712	4,283	5,342	64,331
19														
20	Subtotal	25,490	26,116	25,348	25,370	33,474	44,020	41,281	41,366	38,038	31,291	27,104	29,842	388,738
21	Losses @ 1.71% of 34.5 kV Output	436	447	433	434	572	753	706	707	650	535	463	510	6,647
22	Subtotal with Losses (@ Source)	25,926	26,562	25,781	25,804	34,046	44,772	41,986	42,073	38,688	31,826	27,567	30,352	395,385
23														
24	Western Retail													
25	Retail with Losses (@ Source)	28,741	27,555	28,253	27,702	29,485	38,834	37,317	36,777	34,948	28,354	27,926	29,721	375,614
26	Losses @ 1.68% of 34.5 kV Input	483	463	475	466	496	653	627	618	588	477	470	500	6,315
27	Retail @ Delivery Point	28,258	27,091	27,778	27,236	28,989	38,181	36,690	36,159	34,360	27,878	27,457	29,222	369,299
28														
29														
30	Total Load (wholesale at source before loss + retail @ delivery pt.)													758,036

¹ With "behind the meter" generation added back in.

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6a - Summary of Exclusions
Historical Test Year Ending December 31, 2013

<u>Acct</u>	<u>Excluded</u> <u>Amount</u>
920	\$ (82)
921	\$ (2,161)
926	\$ (4,625)
930.1	\$ (6,177)
930.2	\$ (2,778)
930.4	\$ (203)
930.41	\$ (1,927)
930.42	\$ (40)
930.5	\$ (1,063)
	<u>\$ (19,055)</u>

Western Cooperative Electric Association, Inc.
Mid-Kansas Service Area
34.5kV Formula Based Rate
Work Paper 6b - Detail of Exclusions
Historical Test Year Ending December 31, 2013

Acct	Description	Period*	Vendor*	Reference*	GL Amount Eligible for Exclusion*	Percentage Excluded	Excluded Amount
920	Administrative & General Salaries	2013	multiple	Donation	\$ 19.21	50%	\$ 9.61
920	Administrative & General Salaries	2013	multiple	Excludable Misc. General Exp	\$ 72.19	100%	\$ 72.19
921	Office Supplies & Expenses	2013	multiple	Advertising	\$ 55.00	100%	\$ 55.00
921	Office Supplies & Expenses	2013	multiple	Donation	\$ 1,220.78	50%	\$ 610.39
921	Office Supplies & Expenses	2013	multiple	Excludable Misc. General Exp	\$ 967.27	100%	\$ 967.27
921	Office Supplies & Expenses	2013	multiple	Subscriptions	\$ 528.27	100%	\$ 528.27
926	Employee Pensions and Benefits	2013	multiple	Excludable Employee Benefits	\$ 4,381.09	100%	\$ 4,381.09
926	Employee Pensions and Benefits	2013	multiple	Excludable Misc. General Exp	\$ 243.71	100%	\$ 243.71
930.1	General Advertising Expense	2013	multiple	Advertising	\$ 2,615.61	100%	\$ 2,615.61
930.1	General Advertising Expense	2013	multiple	Donation	\$ 2,770.36	50%	\$ 1,385.18
930.1	General Advertising Expense	2013	multiple	Dues	\$ 3,644.08	50%	\$ 1,822.04
930.1	General Advertising Expense	2013	multiple	Excludable Annual Meeting Exp	\$ 50.00	100%	\$ 50.00
930.1	General Advertising Expense	2013	multiple	Excludable Misc. General Exp	\$ 33.75	100%	\$ 33.75
930.1	General Advertising Expense	2013	multiple	Subscriptions	\$ 270.00	100%	\$ 270.00
930.2	Misc. General Expense	2013	multiple	Dues	\$ 5,555.50	50%	\$ 2,777.75
930.4	Misc. General Expense-Meetings	2013	multiple	Donation	\$ 100.57	50%	\$ 50.29
930.4	Misc. General Expense-Meetings	2013	multiple	Dues	\$ 150.00	50%	\$ 75.00
930.4	Misc. General Expense-Meetings	2013	multiple	Excludable Employee Benefits	\$ 41.16	100%	\$ 41
930.4	Misc. General Expense-Meetings	2013	multiple	Excludable Misc. General Exp	\$ 36.38	100%	\$ 36
930.41	Misc. General Expense-Annual Meeting	2013	multiple	Excludable Annual Meeting Exp	\$ 1,926.80	100%	\$ 1,927
930.42	Miscellaneous Expense-Directors	2013	multiple	Excludable Board Expenses	\$ 40.42	100%	\$ 40
930.5	Directors Fee and Mileage	2013	multiple	Excludable Board Expenses	\$ 1,063.48	100%	\$ 1,063
							<u>\$ 19,055.38</u>

*Note: Combines multiple entries. Due to voluminous size, more refined transaction-specific details can be made available in a separate Excel file.

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Revenue Requirement and Rate Calculation
For the Historical Test Year Ending December 31, 2013

(a)	(b)	(c)	(d)	(e)		(f)	(g)	(h)	(i)
Line No	Description	Source	Unadjusted Historical Test Year [2013]	Adjustments		Adjusted Historical Test Year [2013]	Allocation Factor		FBR Revenue Requirement
				No.	Amount		Name	Factor	
				Source: WP2			Source: WP3		
1	<u>Operating Expenses</u>								
2	Power Production Expense	WP1, L29, Col (d)	\$ -			\$ -		0.000000	
3	Cost of Purchased Power	WP1, L30, Col (d)	\$ 47,539,989			\$ 47,539,989		0.000000	
4	Transmission O&M	WP1, L31, Col (d)	\$ 1,063,550			\$ 1,063,550		1.000000	\$ 1,063,550
5	Distribution Expense-Operation	WP1, L32, Col (d)	\$ 3,372,915	[1]	\$ (1,346)	\$ 3,371,569	DOM	0.000000	\$ -
6	Distribution Expense-Maintenance	WP1, L33, Col (d)	\$ 1,707,972	[2]	\$ -	\$ 1,707,972	DOM	0.000000	\$ -
7	Consumer Accounts Expense	WP1, L34, Col (d)	\$ 1,201,276			\$ 1,201,276		0.000000	\$ -
8	Customer Service and Informational Expense	WP1, L35, Col (d)	\$ 103,643			\$ 103,643		0.000000	\$ -
9	Sales Expense	WP1, L36, Col (d)	\$ 7,246			\$ 7,246		0.000000	\$ -
10	Administration & General	WP1, L37, Col (d)	\$ 1,850,923	[3]	\$ (26,227)	\$ 1,824,696	LAB	0.055318	\$ 100,939
11	Total O&M Expense	Sum (L2:L10)							\$ 1,164,489
12	Depreciation and Amortization	WP1, L38, Col (d)	\$ 2,635,881	[4]	\$ (367,512)	\$ 2,268,369	NP	0.313811	\$ 711,839
13	Property Tax	WP1, L40, Col (d)	\$ -			\$ -	NP	0.313811	\$ -
14	Other Taxes	WP1, L44, Col (d)	\$ 1,103,296	[5]	\$ (1,056,296)	\$ 47,000		0.000000	\$ -
15	L.T. Interest	WP1, L45, Col (d)	\$ 5,458,244	[6]	\$ 241,382	\$ 5,699,626	NP	0.313811	\$ 1,788,605
16	Interest Charged to Construction - Credit	WP1, L46, Col (d)	\$ -	[7]	\$ -	\$ -	NP	0.313811	\$ -
17	Interest-Other	WP1, L47, Col (d)	\$ 88,925	[8]	\$ 44,434	\$ 133,359	NP	0.313811	\$ 41,850
18	Other Deductions	WP1, L48, Col (d)	\$ 1,237,947	[9]	\$ (28,371)	\$ 1,209,576	NP	0.313811	\$ 379,578
19	Total Cost of Electric Service								\$ 4,086,361
20									
21	<u>Margin Requirement</u>								
22	Principal Payments	WP1, L62, Col (d)	\$ 1,507,969	[10]	\$ 79,068	\$ 1,587,037	NP	0.313811	\$ 498,030
23	L.T. Interest	L15	\$ 5,458,244		\$ 241,382	\$ 5,699,626	NP	0.313811	\$ 1,788,605
24	Interest-Other	L16	\$ 88,925		\$ 44,434	\$ 133,359	NP	0.313811	\$ 41,850
25	Subtotal	Sum (L22:24)							\$ 2,328,485
26	Required Coverage Ratio	WP1, L65, Col (d)							1.75
27	Gross Margin Requirements	L25 x L26							4,074,848
28	Less: Offsets to Margin Requirements	WP4, L5, Col (i)							3,114,495
29	Net Margin Requirement	L27 - L28							\$ 960,353
30									
31	<u>Total Revenue Requirements</u>								
32	Add: Net Margin Requirement	L19 + L29							\$5,046,714
33	Divided By Total System Billing Demand	WP5, L28							1,045,018 kW
34	Unadjusted Unit Rate	L32 / L33							\$4.83/kW-mo.
35	Less: Property Tax Surcharge	Dkt. No. 15-SPEE-161-RTS*							\$0.13/kW-mo.
36	Resultant Unit Rate	L34- L35							\$4.70/kW-mo.

* Property Tax rate is from 14-SPEE-297-TAR, 2013 portion only, as utilized in Commission-approved 15-SPEE-161-RTS (excluding the under-recovery for 2012 due to a partial year for the initial rider).

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Allocation of 34.5kV FBR Rate Adjustment to Retail Rate Classes
For the Historical Test Year Ending December 31, 2013

I. Calculation of the 34.5kV FBR Retail Rate Adjustment

Line No.	Description	Source	Amount
1	Resultant LAC rate	Pg. 1, L36	\$ 4.70 /kW/mo
2	Currently Effective LAC rate	15-SPEE-161-RTS	\$ 4.51 /kW/mo
3	Difference	L2 - L3	\$ 0.19 /kW/mo
4			
5	Additional Revenue Needed From Retail:		
6	Retail LAC Demand	WP5, L26, Col (Total)	\$ 658,117 kW
7	Additional Per kW LAC	L3	\$ 0.19 /kW/mo
8			\$ 123,694

II. Proportional Allocation of 34.5kV FBR Retail Rate Adjustment to Rate Classes On Base Revenue by Rate Schedule

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
Line No.	Rate Schedule	Rate Schedule Revenue ¹	Allocated Power Supply Cost of Service ¹	Base Revenue ¹	Percent of Tot Base Rev	Allocation of Rate Adjustment				
						34.5kV FBR Adjustment ¹	Base Revenue	Check the Spread	Historical Energy Sales	34.5kV FBR Adjustment per kWh
		(\$)	(\$)	(\$)	(%)	(\$)	(\$)	(%)	(kWh)	(\$)
1	Residential Service (RS)									
2	General Use	\$ 15,795,617	\$ 8,394,360	\$ 7,401,257	42.17%	\$ 52,161	\$ 7,453,417	42.17%	120,254,071	0.00043
3	Space Heating ²	\$ 974,090	\$ 549,112	\$ 424,978	2.42%	\$ 2,995	\$ 427,973	2.42%	7,989,187	0.00037
4	General Service Small (GSS)	\$ 1,973,424	\$ 1,018,943	\$ 954,482	5.44%	\$ 6,727	\$ 961,208	5.44%	14,402,892	0.00047
5	General Service Large (GSL)	\$ 15,910,577	\$ 9,443,996	\$ 6,466,581	36.84%	\$ 45,574	\$ 6,512,154	36.84%	129,342,862	0.00035
6	General Service Space Heating ²	\$ 604,356	\$ 388,824	\$ 215,533	1.23%	\$ 1,519	\$ 217,052	1.23%	5,838,546	0.00026
7	Industrial Service (IS)	\$ 3,062,258	\$ 2,157,360	\$ 904,898	5.16%	\$ 6,377	\$ 911,275	5.16%	31,190,647	0.00020
8	Interruptible Industrial Service (INT)	\$ -	\$ -	\$ -	0.00%	\$ -	\$ -	0.00%	-	N.A.
9	Real -Time Pricing (RTP) ³	\$ 346,853	\$ 346,853	\$ -	0.00%	\$ -	\$ -	0.00%	6,543,983	N.A.
10	Sub-transmission Level Service STR) ⁴	\$ 24,506,560	N.A.	N.A.	0.00%	\$ -	\$ -	0.00%	394,232,064	N.A.
11	Municipal Power Service (M-I)	\$ 195,001	\$ 108,996	\$ 86,005	0.49%	\$ 606	\$ 86,611	0.49%	1,548,098	0.00039
12	Water Pumping Service (WP)	\$ 602,435	\$ 362,522	\$ 239,914	1.37%	\$ 1,691	\$ 241,604	1.37%	5,294,691	0.00032
13	Irrigation Service (IP-I)	\$ 244,652	\$ 127,308	\$ 117,344	0.67%	\$ 827	\$ 118,171	0.67%	1,780,952	0.00046
14	Temporary Service (CS)	\$ 18,172	\$ 8,988	\$ 9,184	0.05%	\$ 65	\$ 9,249	0.05%	92,534	0.00070
15	Lighting	\$ 1,015,807	\$ 284,675	\$ 731,132	4.17%	\$ 5,153	\$ 736,285	4.17%	4,260,217	0.00121
16	Total Retail Rates	\$ 65,249,803	\$ 23,191,937	\$ 17,551,306	100.00%	\$ 123,694	\$ 17,675,000	100.00%	722,770,744	

¹ See Workpaper 7 for detail.

² The per kWh Adjustment shown in Column (k) constitutes annual average, with the actual seasonal components varying due to rate design. See Work Paper 7 for detail.

³ Exclude RTP (marginal piece/unadjustable rate). Note, however, that these customers will still share in the 34.5kV FBR adjustment per their corresponding baseline tariff.

⁴ STR customers will not share in retail 34.5kV FBR adjustment: 115 STR take service at a higher voltage level, and 34.5 kV STR pay their share of 34.5 kV system costs in the LAC (demand) rate component.

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 1 - Input Data
Historical Test Year Ending December 31,

Historical Test Year Ending December 31,			2013		
Line	Description	Source	Amount		Notes
No	(a)	(b)	(d)	(e)	(f)
<u>A. Net Plant in Service</u>			As of December 31, 2013		
			Plant in Service	Accum. Res. for Depr.	
1	1. Facilities Used to Provide Local Access Delivery Service				
2	Transmission Facilities	Trial Balance	\$ 104,315		
3	350 Land and Land Rights	Trial Balance			
4	352 Structures and Improvements	Trial Balance	\$ 6,705,410		
5	353 Station Equipment	Trial Balance	\$ 8,880,396		
6	355 Poles and Fixtures	Trial Balance	\$ 8,425,343		
7	356 O.H. Conductors and Devices	Trial Balance	\$ -		
8	358 U.G. Conductors and Devices	Trial Balance	\$ 24,115,465	\$ 5,114,850	GL acct 108.5
9	Subtotal	Sum(L5:L10)			
10	Distribution Facilities (If Applicable)		N/A	N/A	
11	360 Land and Land Rights	Company Direct Assessment	N/A	N/A	
12	361 Structures and Improvements	Company Direct Assessment	N/A	N/A	
13	362 Station Equipment	Company Direct Assessment	N/A	N/A	
14	Subtotal	L13 + L15	-	-	
15	Total	Ln 11 + Ln 16	\$ 24,115,465	\$ 5,114,850	
<u>2. All Facilities</u>					
16	301-301 Intangible Plant	Trial Balance	\$ -	\$ -	
17	350-359 Transmission Plant	Trial Balance	\$ 24,115,465	\$ 5,114,850	GL acct 108.5
18	360-373 Distribution Plant	Trial Balance	\$ 49,562,714	\$ 11,339,331	GL acct. 108.6,108.61
19	389-399 General Plant	Trial Balance	\$ 6,417,477	\$ 2,382,187	GL acct. 108.7-108.78
20	Total		\$ 80,095,656	\$ 18,836,367	
			Historical	Budget	
			Test Year	Year	
<u>B. Operating Expenses</u>			2013	2014	
21	Power Production Expense	Statement of Operations	\$ -		
22	Cost of Purchased Power	Statement of Operations	\$ 47,539,989		
23	Transmission O&M	Statement of Operations	\$ 1,063,550		
24	Distribution Expense-Operation	Statement of Operations	\$ 3,372,915		
25	Distribution Expense-Maintenance	Statement of Operations	\$ 1,707,972		
26	Consumer Accounts Expense	Statement of Operations	\$ 1,201,276		
27	Customer Service and Informational Expense	Statement of Operations	\$ 103,643		
28	Sales Expense	Statement of Operations	\$ 7,246		
29	Administrative and General	Statement of Operations	\$ 1,850,923		
30	Depreciation and Amortization	Statement of Operations	\$ 2,635,881	\$ 3,053,828	
31	Depreciation Expense - Distribution	Trial Balance	\$ 1,245,872		
32	Depreciation Expense - Transmission	Trial Balance	\$ 487,359		
33	Depreciation Expense - General Plant	Trial Balance	\$ 117,191		
34	Amortization of AP (booked within Depreciation Expense)	Trial Balance	\$ 785,459		
35	Property Tax	Statement of Operations	\$ -		
36	Other Taxes	Statement of Operations	\$ 1,103,296		
37	L.T. Interest	Statement of Operations	\$ 5,458,244	\$ 5,699,626	
38	Interest Charged to Construction - Credit	Statement of Operations	\$ -		
39	Interest-Other	Statement of Operations	\$ 88,925	\$ 133,359	
40	Other Deductions	Statement of Operations	\$ 1,237,947		
<u>C. Payroll</u>					Part of GL acct
41	Transmission	Payroll Journal (Labor Amt)	\$ 100,036		560-573
42	Distribution	Payroll Journal (Labor Amt)	\$ 1,363,601		580-598
43	Customer Accounting	Payroll Journal (Labor Amt)	\$ 322,677		901-905
44	Customer Service and Information	Payroll Journal (Labor Amt)	\$ 20,576		907-910
45	Sales	Payroll Journal (Labor Amt)	\$ 1,490		911-916
46	Administration and General	Payroll Journal (Labor Amt)	\$ 82,462		920-932
47	Total		\$ 1,890,843		Non-capitalized items
<u>D. Miscellaneous</u>			Historical	Budget	
			Test Year	Year	
			2013	2014	Source/Notes
48	1. Debt Service				
49	Principal Payment	F7, Pt.O, Col. B	\$ 1,507,969	\$ 1,587,037	
50	Interest Expense	Ln 45 + Ln 47	\$ 5,547,169	\$ 5,832,985	Southern Pioneer uses CoBank formula
51	2. Target MDSC	As approved by Commission	1.75		Same as DSC-FBR
52	3. Margin Offsets				
53	Cash Capital Credits Received (from G&T/Lenders)	F7 or Supplementary Company Schedules	\$ 633,744		CFC F7, Part J
54	Non-cash Other Deductions (Amortizations)	Trial Balance	\$ 1,189,650		GL acct 426.6, 428, 428.1
55	3. Other				
56	Other Taxes - paid in cash	Trial Balance or Supplementary Company Schedules	\$ 47,000		AMT tax paid, independent of income/operations.

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 2 - Adjustments To Historical Test Year Expenses
For the Historical Test Year Ending December 31, 2013

<u>Line No</u>	<u>Type</u>	<u>Source</u>	<u>Amount</u>	<u>Notes</u>
1	1. Adjustment to Distribution Operations Expense per K.S.A. 66-101f(a), if any:			
2	Applicable Disallowance - Distribution Operations	WP6	\$ (1,346)	Docket No. 14-SPEE-507-RTS
3	Total Adjustment	L2	<u><u>\$ (1,346)</u></u>	
4				
5	2. Adjustment to Distribution Maintainance per K.S.A. 66-101f(a), if any:			
6	Applicable Disallowance - Distribution Maintenance	WP6	\$ -	Docket No. 14-SPEE-507-RTS
7	Total Adjustment	L6	<u><u>\$ -</u></u>	
8				
9	3. Adjustment to A&G per K.S.A. 66-101f(a), if any:			
10	Applicable Disallowance - A&G	WP6	\$ (26,227)	Docket No. 14-SPEE-507-RTS
11	Total Adjustment	L10	<u><u>\$ (26,227)</u></u>	
12				
13	4. Adjustment to Depreciation Expense			
14	Historical Amount	Pg.1, L12, Col (d)	\$ 2,635,881	
15	Projected	WP1, L38, Col (e)	\$ 3,053,828	
16	Subtotal Adjustment	L15 - L14	\$ 417,947	
17	Less: Amortization of AP (if applicable)	WP1, L42, Col (d)	\$ 785,459	amortization of AP amount is constant
18	Total Adjustment	L16 - L17	<u><u>\$ (367,512)</u></u>	
19				
20	5. Adjustment to Other Taxes			
21	Historical Amount	Pg.1, L14, Col (d)	\$ 1,103,296	
22	Paid in Cash	WP1, L72, Col (e)	\$ 47,000	AMT tax paid, independent of income/operations.
23	Total Adjustment	L22 - L21	<u><u>\$ (1,056,296)</u></u>	
24				
25	6. Adjustment to LT Interest			
26	Historic Amount	Pg.1, L15, Col (d)	\$ 5,458,244	
27	Projected	WP1, L45, Col (e)	\$ 5,699,626	
28	Total Adjustment	L27 - L26	<u><u>\$ 241,382</u></u>	
29				
30	7. Adjustment to Interest Charged To Construction			
31	Historical Amount	Pg.1, L16, Col (d)	\$ -	
32	Projected	WP1, L46, Col (e)	\$ -	
33	Total Adjustment	L32 - L31	<u><u>\$ -</u></u>	
34				
35	8. Adjustment to Interest-Other			
36	Historical Amount	Pg.1, L17, Col (a)	\$ 88,925	
37	Projected	WP1, L47, Col (e)	\$ 133,359	
38	Total Adjustment	L37 - L36	<u><u>\$ 44,434</u></u>	
39				
40	9. Adjustment to Other Deductions per K.S.A. - 66-101f(a), if any:			
41	Applicable Disallowance - Other Deductions	WP6	\$ (28,371)	Docket No. 14-SPEE-507-RTS
42	Total Adjustment	L41	<u><u>\$ (28,371)</u></u>	
43				
44	10. Adjustment to Principal			
45	Historical Amount	Pg.1, L22, Col (d)	\$ 1,507,969	
46	Projected Amount	WP1, L62, Col (e)	\$ 1,587,037	
47	Total Adjustment	L46 - L45	<u><u>\$ 79,068</u></u>	

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 3 - Allocation Factors
Historical Test Year Ending December 31, 2013

Line No.	Description	Source	Allocator	Amount
1	Distribution O&M Allocation Factor			
2	Distr. Plant used to provide Local Access Delivery Service	WP1, L16, Col (d)		\$ -
3	Total Distribution Plant	WP1, L22, Col (d)		\$ 49,562,714
4				
5	Allocation Factor	L2 / L3	DOM	-
6				
7	Labor Allocation Factor			
8	Transmission Wages	WP1, L51, Col (d)		\$ 100,036
9	Allocated Distribution Wages			
10	Total Distribution Wages	WP1, L52, Col (d)		\$ 1,363,601
11	Allocation Factor	L5	DOM	\$ -
12		L10 * L11		\$ -
13	Total LAC Wages	L8 + L12		\$ 100,036
14				
15	Total Wages Other than A&G			
16	Total Wages	WP1, L57, Col (d)		\$ 1,890,843
17	Less: Administration & General Wages	WP1, L56, Col (d)		82,462
18		L16 - L17		\$ 1,808,381
19				
20	Transmission Labor Allocator	L13 / L18	LAB	0.055318
21				
22	Net Plant Allocation Factor			
23	Plant-in-Service			
24	Transmission	WP1, L11, Col (d)		\$ 24,115,465
25	Distr. Plant Used to provide Local Access Delivery Service	L2		\$ -
26	General Plant			
27	Total General Plant	WP1, L23, Col (d)		\$ 6,417,477
28	Allocation Factor	L20	LAB	0.055318
29		L27 * L28		\$ 355,003
30	Total LAC Plant-in-Service	L24 + L25 + L29		\$ 24,470,468
31				
32	Accumulated Reserves for Depreciation			
33	Transmission	WP1, L11, Col (e)		\$ 5,114,850
34	Distr. Plant Used to provide Local Access Delivery Service	WP1, L16, Col (e)		\$ -
35	Allocated General Plant			
36	Total General Plant	WP1, L23, Col (e)		\$ 2,382,187
37	Allocation Factor	L20	LAB	0.055318
38		L36 * L37		\$ 131,778
39	Total LAC Accum. Depr. Res.	L33 + L34 + L38		\$ 5,246,628
40				
41	Net Plant Used in LAC	L30 - L39		\$ 19,223,840
42				
43	Total Plant in Service	WP1, L24, Col (d)		\$ 80,095,656
44	Less: Total Accum. Reserves for Depr.	WP1, L24, Col (e)		\$ 18,836,367
45	Total Net Plant	L43 - L44		\$ 61,259,289
46				
47	Transmission Net Plant Allocator	L41 / L45	NP	0.313811

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 4 - Margin Requirement Offsets
For the Historical Test Year Ending December 31, 2013

(a) Line No	(b) Item	(c) Source	(d)	(e)	(f)	(g) (h) Allocation Factor		(i)
			Historical Tot Amount	Adjustment	Adjusted Amount	Name	Value	Allocated to FBR
				pg 1, Col (e)		pg.1 Col (g) and (h)		
1	Interest Expense (LT Interest plus Interest-Other)	WP1, L63, Col (d)	\$ 5,547,169	\$ 285,816	\$ 5,832,985	NP	0.313811	\$ 1,830,455
2	Depreciation Expense	Pg.1, L0, Col (d)	\$ 2,635,881	\$ (367,512)	\$ 2,268,369	NP	0.313811	\$ 711,839
3	Non-cash Other Deductions (Amortizations)	WP1, L69, Col (d)	\$ 1,189,650	\$ -	\$ 1,189,650	NP	0.313811	\$ 373,325
4	Cash Capital Credits Received	WP1, L68, Col (d)	\$ 633,744	\$ -	\$ 633,744	NP	0.313811	\$ 198,876
5	Resultant Amount	Sum (L7:L10)	\$ 10,006,444		\$ 9,924,748			<u>\$ 3,114,495</u>

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 5 - Summary of Local Access Billing Demands (kW)
For the Historical Test Year Ending December 31, 2013

<u>Line</u>	<u>Description</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Total</u>
1	Total Local Access System ¹	66,900	66,115	63,264	73,106	91,316	123,877	121,086	111,720	106,391	90,654	71,644	78,380	1,064,455
2	CP Date	14	20	26	30	28	27	09	30	07	02	13	09	
3	CP Time (hour Ending) CST	1900	1500	900	1600	1500	1600	1600	1500	1700	1600	1900	1900	
4														
5	Wholesale Customers @ Del. Pt.													
6	Ashland (KMEA)--Metered	2,010	1,941	1,865	2,026	2,550	3,410	3,246	2,906	2,518	2,325	1,621	2,260	28,677
7	Ashland (KMEA)--Generation	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Subtotal--Ashland	2,010	1,941	1,865	2,026	2,550	3,410	3,246	2,906	2,518	2,325	1,621	2,260	28,677
9	Meade (KMEA)--Metered ²	-	-	-	-	-	-	4,808	4,615	4,109	3,275	2,206	2,787	21,799
10	Meade (KMEA)--Generation ²	-	-	-	-	-	-	0.25	0.25	-	0.25	0.25	0.25	1
11	Subtotal--Meade	-	-	-	-	-	-	4,808	4,615	4,109	3,276	2,206	2,788	21,801
12	Kingman (KPP)	6,978	6,026	6,124	6,343	6,353	6,208	6,521	5,968	6,404	7,268	4,491	6,661	75,343
13	Kingman (KPP) Generation ³	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Subtotal--Kingman	6,978	6,026	6,124	6,343	6,353	6,208	6,521	5,968	6,404	7,268	4,491	6,661	75,343
15	Greensburg (KPP)	2,051	1,847	2,018	1,363	2,031	2,778	2,815	2,659	2,314	1,849	1,648	2,373	25,744
16	Greensburg Wind Farm (KPP)	1,398	11,723	4	6,588	3,980	3,031	2,083	386	2,911	10,181	12,340	176	54,798
17	Isabel (AR)	79	81	94	80	125	243	204	189	179	234	180	287	1,977
18	KEPCO ⁴	10,073	9,098	12,522	14,671	18,235	23,524	18,426	17,073	16,066	13,219	12,460	13,195	178,562
19	Subtotal--Wholesale	22,588	30,715	22,626	31,070	33,274	39,195	38,102	33,795	34,500	38,350	34,946	27,739	386,900
20	Losses @ 1.86% of 34.5 kV Output	420	571	421	578	619	729	709	629	642	713	650	516	7,196
21	Subtotal with Losses (@ Source)	23,008	31,286	23,047	31,648	33,893	39,924	38,810	34,423	35,142	39,064	35,596	28,255	394,097
22														
23	Southern Pioneer Retail													
24	Retail with Losses (@ Source)	43,892	34,829	40,217	41,458	57,423	83,953	82,276	77,297	71,250	51,590	36,049	50,125	670,358
25	Losses @ 1.83% of 34.5 kV Input	801	636	734	757	1,049	1,533	1,502	1,411	1,301	942	658	915	12,241
26	Retail @ Delivery Point	43,091	34,193	39,482	40,701	56,374	82,420	80,774	75,886	69,949	50,648	35,390	49,210	658,117
27														
28	Total Load (Wholesale @ Source/before losses + Retail @ Delivery Point)													1,045,018

¹ With "behind the meter" generation, excluding Kingman, added back in.

² For January - June 2013, it is in KEPCO's load (see footnote 4).

³ Exclude Kingman generation since MKEC does not have the transmission capacity to cover the full load.

⁴ Includes all delivery points and City of Meade and Meade's Generation for January through June, 2013 (Meade switched to KMEA in July)

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 6a - Summary of Exclusions
For the Historical Test Year Ending December 31, 2013

Account	Description	Total Adjustment*
* for 2013, the amounts are per Docket No. 14-SPEE-507-RTS		
	Distribution Expense - Operation	1,346.00
	A&G	26,227.00
	Other Deductions	28,371.00
		55,944.00

**Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 6a - Summary of Exclusions
For the Historical Test Year Ending December 31, 2013**

Account	Description	Date	Vendor	Reference	Total Amount	Percent Excluded	Total Adjustment*
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* For 2013 Test Year, the amounts are as approved in Docket 14-SPEE-507-RTS

Southern Pioneer Electric Company

34.5kV Formula Based Rate

**Work Paper 7 - Proportional Allocation of 34.5kV FBR Retail Rate Adjustment to Rate Classes
For the Historical Test Year Ending December 31, 2013**

Exhibit 2-4

Page 10

(a)	(b)	(c)			(d)			(e)	(f)	(i)	(j)	(k)
Line No.	Rate Schedule	Historical Revenue Rates ¹	Historical Energy Sales ¹	Power Costs Per kWh Sold 380 Docket ²	Base Power Costs Recovered in Rates	Historical ECA-2 Revenue By Rate ¹	Total Power Costs Recovered in Rates	Base Revenue by Rate	Percent	Allocation of Retail Rate Adjustment		
		(\$)	(kWh)	(cents/kWh)	(\$)	(\$)	(\$)	(\$)	(%)	34.5kV FBR Adjustment	Adjusted Base Revenue by Rate	Percent
1	Residential Service (RS)											
2	General Use	\$ 15,795,617	\$ 120,254,071	6.79	\$ 8,164,211	\$ 230,149	\$ 8,394,360	\$ 7,401,257	42.17%	\$ 52,161	\$ 7,453,417	42.17%
3	Space Heating	\$ 974,090	\$ 7,989,187	6.77	\$ 541,191	\$ 7,922	\$ 549,112	\$ 424,978	2.42%	\$ 2,995	\$ 427,973	2.42%
4	General Service Small (GSS)	\$ 1,973,424	\$ 14,402,892	6.90	\$ 994,033	\$ 24,910	\$ 1,018,943	\$ 954,482	5.44%	\$ 6,727	\$ 961,208	5.44%
5	General Service Large (GSL)	\$ 15,910,577	\$ 129,342,862	7.07	\$ 9,147,461	\$ 296,535	\$ 9,443,996	\$ 6,466,581	36.84%	\$ 45,574	\$ 6,512,154	36.84%
6	General Service Space Heating	\$ 604,356	\$ 5,838,546	6.48	\$ 378,489	\$ 10,334	\$ 388,824	\$ 215,533	1.23%	\$ 1,519	\$ 217,052	1.23%
7	Industrial Service (IS)	\$ 3,062,258	\$ 31,190,647	6.63	\$ 2,069,362	\$ 87,998	\$ 2,157,360	\$ 904,898	5.16%	\$ 6,377	\$ 911,275	5.16%
8	Interruptible Industrial Service (INT)	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	0.00%	\$ -	\$ -	0.00%
9	Real -Time Pricing (RTP) ²	\$ 346,853	\$ 6,543,983	6.34	\$ 346,853	\$ -	\$ 346,853	\$ -	0.00%	\$ -	\$ -	0.00%
10	Sub-transmission Level Service (STR) ³	\$ 24,506,560	\$ 394,232,064	6.19	\$ N.A.	\$ N.A.	\$ N.A.	\$ N.A.	0.00%	\$ -	\$ -	0.00%
11	Municipal Power Service (M-I)	\$ 195,001	\$ 1,548,098	6.84	\$ 105,943	\$ 3,053	\$ 108,996	\$ 86,005	0.49%	\$ 606	\$ 86,611	0.49%
12	Water Pumping Service (WP)	\$ 602,435	\$ 5,294,691	6.57	\$ 347,967	\$ 14,555	\$ 362,522	\$ 239,914	1.37%	\$ 1,691	\$ 241,604	1.37%
13	Irrigation Service (IP-I)	\$ 244,652	\$ 1,780,952	6.91	\$ 123,131	\$ 4,177	\$ 127,308	\$ 117,344	0.67%	\$ 827	\$ 118,171	0.67%
14	Temporary Service (CS)	\$ 18,172	\$ 92,534	9.42	\$ 8,714	\$ 274	\$ 8,988	\$ 9,184	0.05%	\$ 65	\$ 9,249	0.05%
15	Lighting	\$ 1,015,807	\$ 4,260,217	6.41	\$ 273,260	\$ 11,415	\$ 284,675	\$ 731,132	4.17%	\$ 5,153	\$ 736,285	4.17%
16	Total Retail Rates	\$ 65,249,803	\$ 722,770,744		\$ 22,500,615	\$ 691,323	\$ 23,191,937	\$ 17,551,306	100.00%	\$ 123,694	\$ 17,675,000	100.00%

Resultant Tot Rate Rev	% Chg on Tot Rev
15,847,777	0.3%
977,085	0.3%
1,980,151	0.3%
15,956,151	0.3%
605,875	0.3%
3,068,635	0.2%
-	0.0%
346,853	0.0%
24,506,560	0.0%
195,607	0.3%
604,126	0.3%
245,479	0.3%
18,237	0.4%
1,020,960	0.5%
65,373,497	0.19%

¹ See Patronage Report for historical usage and revenues by rate class (Work Paper 8).

² Exclude RTP (marginal piece/unadjustable rate). Note, however, that these customers will still share in the 34.5kV FBR adjustment per their corresponding baseline tariff.

³ STR customers will not share in retail 34.5kV FBR adjustment: 115 STR take service at a higher voltage level, and 34.5 kV STR pay their share of 34.5 kV system costs in the

Southern Pioneer Electric Company
34.5kV Formula Based Rate
2013 Usage and Revenues by Retail Class (from Southern Pioneer Patronage Report)
Work Paper 8 - Supporting Data for the Allocation of the 34.5kV FBR Rate Adjustment

kWh Totals by Retail Rate Class			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	
Res	1	1.440.	Residential	9,686,712	8,750,855	8,115,785	7,570,019	7,116,673	10,550,805	15,459,468	14,062,036	14,328,922	8,432,929	6,820,231	9,359,636	120,254,071
Res	13		Residential Heating	954,857	900,844	847,455	682,847	550,585	482,360	625,175	579,163	595,303	426,256	462,055	882,287	7,989,187
Comm	2	1.442.1	Commercial Small	1,354,569	1,306,379	1,139,860	1,149,540	1,015,002	1,143,503	1,425,817	1,355,063	1,331,844	1,037,914	935,146	1,208,255	14,402,892
Comm	3	1.442.1	Commercial Large	9,878,898	9,812,327	10,662,092	9,367,190	8,960,617	10,414,638	12,296,925	12,126,703	12,679,222	11,321,174	10,999,385	10,823,691	129,342,862
Comm	4	1.442.1	Commercial Space Heating	577,648	517,162	511,402	441,263	378,437	416,734	551,246	513,177	527,058	381,827	387,001	635,591	5,838,546
Ind	6	1.442.2	Industrial	2,149,835	2,049,592	2,223,057	2,458,876	2,349,109	2,557,129	2,774,780	2,658,272	2,692,103	3,047,552	3,000,116	3,230,226	31,190,647
	7		Industrial Interruptible	-	-	-	-	-	-	-	-	-	-	-	-	-
Ind	12	1.442.2	Real Time Pricing	21,921	17,883	20,003	22,583	29,050	145,431	146,554	120,695	141,719	96,170	4,285,104	1,496,870	6,543,983
Ind	9	1.442.2	Industrial-Sub Trans 34.5	8,238	17,445	4,420	4,057	3,322	3,272	4,825	3,335	1,762	2,170	4,663	7,776	65,285
Ind	15		Industrial-Sub Trans 115	30,702,443	27,668,250	27,360,956	32,646,124	34,437,152	34,976,827	36,884,893	38,367,953	35,612,148	35,547,801	29,233,001	30,729,231	394,166,779
Irr	8	1.441	Irrigation	13,505	8,625	15,803	35,099	66,638	180,207	595,130	419,673	296,533	112,902	27,696	9,141	1,780,952
Comm	5	1.442.15	Commercial Municipal	113,682	111,676	104,696	99,685	98,464	150,146	206,098	181,324	166,681	113,040	95,986	106,620	1,548,098
WP	16		Water Pumping	293,438	262,333	261,387	287,105	403,156	616,372	686,484	627,675	697,744	455,677	363,837	339,483	5,294,691
Lights	10	1.444.	Street Lighting	355,041	355,031	354,982	355,588	354,746	355,160	355,945	356,776	356,034	353,692	353,721	353,501	4,260,217
Temp	17		Temporary Service	6,620	8,500	6,071	6,381	5,053	3,755	5,995	10,631	7,698	6,554	7,908	17,368	92,534
Resale	11	1.447.	Resale	-	-	-	-	-	-	-	-	-	-	-	-	-
Own Use	14	1.442.3	Own Use	-	-	-	-	-	-	-	-	-	-	-	-	-
				56,117,407	51,786,902	51,627,969	55,126,357	55,768,004	61,996,339	72,019,335	71,382,476	69,434,771	61,335,658	56,975,850	59,199,676	722,770,744

Revenue Totals by Retail Rate Class			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	
Res	1	1.440.	Residential	\$ 1,133,318	\$ 1,042,920	\$ 974,385	\$ 961,200	\$ 963,450	\$ 1,319,501	\$ 2,104,530	\$ 1,856,775	\$ 1,881,803	\$ 1,223,992	\$ 1,027,734	\$ 1,306,009	\$ 15,795,617
Res	13		Residential Heating	\$ 97,132	\$ 94,284	\$ 88,785	\$ 76,822	\$ 69,709	\$ 59,741	\$ 87,948	\$ 79,037	\$ 80,151	\$ 62,216	\$ 66,216	\$ 112,048	\$ 974,090
Comm	2	1.442.1	Commercial Small	\$ 159,944	\$ 155,845	\$ 147,711	\$ 150,407	\$ 146,361	\$ 153,506	\$ 199,544	\$ 186,107	\$ 183,082	\$ 164,037	\$ 152,529	\$ 174,351	\$ 1,973,424
Comm	3	1.442.1	Commercial Large	\$ 1,092,902	\$ 1,091,036	\$ 1,201,682	\$ 1,113,692	\$ 1,190,399	\$ 1,276,348	\$ 1,575,302	\$ 1,489,481	\$ 1,547,392	\$ 1,467,341	\$ 1,470,129	\$ 1,394,874	\$ 15,910,577
Comm	4	1.442.1	Commercial Space Heating	\$ 48,073	\$ 44,165	\$ 43,869	\$ 41,741	\$ 39,200	\$ 41,209	\$ 65,006	\$ 59,845	\$ 60,001	\$ 50,224	\$ 45,211	\$ 65,812	\$ 604,356
Ind	6	1.442.2	Industrial	\$ 187,933	\$ 178,376	\$ 191,236	\$ 236,473	\$ 220,167	\$ 258,341	\$ 284,677	\$ 265,642	\$ 276,651	\$ 320,743	\$ 324,215	\$ 317,806	\$ 3,062,258
	7		Industrial Interruptible	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ind	12	1.442.2	Real Time Pricing	\$ 1,280	\$ 1,126	\$ 1,110	\$ 1,218	\$ 1,553	\$ 6,567	\$ 8,506	\$ 10,606	\$ 12,939	\$ 7,566	\$ 217,451	\$ 76,931	\$ 346,853
Ind	9	1.442.2	Industrial-Sub Trans 34.5	\$ 1,321	\$ 925	\$ 365	\$ 288	\$ 278	\$ 265	\$ 330	\$ 374	\$ 254	\$ 281	\$ 402	\$ 537	\$ 5,620
Ind	15		Industrial-Sub Trans 115	\$ 1,752,635	\$ 1,718,496	\$ 1,935,903	\$ 1,869,172	\$ 2,149,674	\$ 2,069,837	\$ 2,125,438	\$ 2,333,560	\$ 2,385,794	\$ 2,294,544	\$ 1,924,086	\$ 1,941,802	\$ 24,500,940
Irr	8	1.441	Irrigation	\$ 917	\$ 595	\$ 43,073	\$ 23,404	\$ 26,424	\$ 14,097	\$ 56,806	\$ 38,324	\$ 27,179	\$ 10,393	\$ 2,601	\$ 839	\$ 244,652
Comm	5	1.442.15	Commercial Municipal	\$ 12,876	\$ 12,777	\$ 11,986	\$ 11,776	\$ 12,829	\$ 17,493	\$ 27,341	\$ 23,075	\$ 21,067	\$ 15,394	\$ 13,661	\$ 14,724	\$ 195,001
WP	16		Water Pumping	\$ 29,213	\$ 26,251	\$ 26,140	\$ 30,747	\$ 44,166	\$ 65,375	\$ 83,965	\$ 73,445	\$ 80,935	\$ 56,438	\$ 45,201	\$ 40,560	\$ 602,435
Lights	10	1.444.	Street Lighting	\$ 80,908	\$ 81,163	\$ 80,926	\$ 82,461	\$ 85,716	\$ 84,013	\$ 86,711	\$ 82,743	\$ 84,180	\$ 85,515	\$ 90,976	\$ 90,494	\$ 1,015,807
Temp	17		Temporary Service	\$ (699)	\$ 1,785	\$ 1,283	\$ 1,424	\$ 1,112	\$ 821	\$ 1,362	\$ 2,016	\$ 1,682	\$ 1,476	\$ 1,893	\$ 4,016	\$ 18,172
Resale	11	1.447.	Resale	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Own Use	14	1.442.3	Own Use	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
				\$ 4,597,753	\$ 4,449,745	\$ 4,748,453	\$ 4,600,823	\$ 4,951,038	\$ 5,367,114	\$ 6,707,467	\$ 6,501,029	\$ 6,643,110	\$ 5,760,162	\$ 5,382,305	\$ 5,540,804	\$ 65,249,803

PCA Totals by Retail Rate Class			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	
Res	1	1.440.	Residential	\$ (65,373)	\$ (56,165)	\$ (56,687)	\$ (12,131)	\$ 38,854	\$ 27,867	\$ 91,909	\$ 7,165	\$ (650)	\$ 50,613	\$ 103,636	\$ 101,111	\$ 230,149
Res	13		Residential Heating	\$ (6,574)	\$ (5,633)	\$ (6,050)	\$ (2,276)	\$ 3,769	\$ 708	\$ 4,185	\$ 435	\$ (233)	\$ 2,095	\$ 7,076	\$ 10,419	\$ 7,922
Comm	2	1.442.1	Commercial Small	\$ (9,100)	\$ (8,424)	\$ (8,338)	\$ (1,258)	\$ 5,464	\$ 2,972	\$ 8,424	\$ 630	\$ 152	\$ 7,572	\$ 14,179	\$ 12,638	\$ 24,910
Comm	3	1.442.1	Commercial Large	\$ (67,435)	\$ (62,476)	\$ (58,666)	\$ (30,585)	\$ 58,231	\$ 15,040	\$ 82,484	\$ 8,631	\$ (4,385)	\$ 59,279	\$ 167,048	\$ 129,370	\$ 296,535
Comm	4	1.442.1	Commercial Space Heating	\$ (3,836)	\$ (3,364)	\$ (3,542)	\$ (299)	\$ 1,905	\$ 1,356	\$ 2,958	\$ 190	\$ 136	\$ 2,670	\$ 5,860	\$ 6,300	\$ 10,334
Ind	6	1.442.2	Industrial	\$ (15,081)	\$ (13,371)	\$ (14,150)	\$ (7,663)	\$ 16,399	\$ 2,714	\$ 19,198	\$ 2,430	\$ (1,657)	\$ 12,962	\$ 46,936	\$ 39,282	\$ 87,998
	7		Industrial Interruptible	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ind	12	1.442.2	Real Time Pricing	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,264	\$ 5,723	\$ 3,540	\$ 1,255	\$ 14,781
Ind	9	1.442.2	Industrial-Sub Trans 34.5	\$ 167	\$ 257	\$ 605	\$ 186	\$ 127	\$ 127	\$ 114	\$ 157	\$ 118	\$ 71	\$ 80	\$ 171	\$ 2,179
Ind	15		Industrial-Sub Trans 115	\$ 917,320	\$ 956,074	\$ 959,258	\$ 1,150,255	\$ 1,024,435	\$ 1,315,844	\$ 1,219,992	\$ 1,199,497	\$ 1,355,540	\$ 1,438,019	\$ 1,308,515	\$ 1,070,220	\$ 13,914,967
Irr	8	1.441	Irrigation	\$ (96)	\$ (52)	\$ (116)	\$ (207)	\$ 447	\$ 582	\$ 2,267	\$ 308	\$ 19	\$ 474	\$ 429	\$ 122	\$ 4,177
Comm	5	1.442.15	Commercial Municipal	\$ (793)	\$ (686)	\$ (759)	\$ (454)	\$ 724	\$ 90	\$ 1,566	\$ 178	\$ (137)	\$ 420	\$ 1,487	\$ 1,416	\$ 3,053
WP	16		Water Pumping	\$ (1,937)	\$ (1,751)	\$ (1,765)	\$ 237	\$ 1,906	\$ 1,507	\$ 4,178	\$ 368	\$ (137)	\$ 2,985	\$ 5,525	\$ 3,440	\$ 14,555
Lights	10	1.444.	Street Lighting	\$ 313	\$ (2,235)	\$ (2,518)	\$ (1,069)	\$ 2,279	\$ 502	\$ 2,407	\$ 308	\$ (122)	\$ 1,826	\$ 5,417	\$ 4,307	\$ 11,415
Temp	17		Temporary Service	\$ (10)	\$ (62)	\$ (37)	\$ 37	\$ 14	\$ 5	\$ 48	\$ 11	\$ (6)	\$ 40	\$ 118	\$ 117	\$ 274
Resale	11	1.447.	Resale	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Own Use	14	1.442.3	Own Use	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
				\$ 747,563	\$ 802,111	\$ 807,235	\$ 1,094,772	\$ 1,154,554	\$ 1,369,315	\$ 1,439,730	\$ 1,220,308	\$ 1,352,902	\$ 1,584,749	\$ 1,669,845	\$ 1,380,168	\$ 14,623,250

Cons Totals by Retail Rate Class			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Avg Cons	
Res	1	1.440.	Residential	12,287	12,261	12,278	12,278	12,302	12,351	12,352	12,361	12,308	12,295	12,269	12,251	12,299
Res	13		Residential Heating	681	679	683	695	685	689	699	702	691	686	700	695	690
Comm	2	1.442.1	Commercial Small	2,689	2,660	2,641	2,645	2,634	2,623	2,620	2,615	2,601	2,603	2,607	2,607	2,629
Comm	3	1.442.1	Commercial Large	1,228	1,246	1,263	1,264	1,274	1,296	1,309	1,314	1,329	1,325	1,322	1,332	1,292
Comm	4	1.442.1	Commercial Space Heating	44	44	43	42	42	45	46	45	45	46	46	46	45
Ind	6	1.442.2	Industrial	9	9	9	9	9	9	12	13	13	13	13	13	11
	7		Industrial Interruptible	-	-	-	-	-	-	-	-	-	-	-	-	-
Ind	12	1.442.2	Real Time Pricing	1	1	1	1	1	1	1	1	1	1	1	2	1
Ind	9	1.442.2	Industrial-Sub Trans 34.5	1	1	1	1	1	1	1	1	1	1	1	1	1
Ind	15		Industrial-Sub Trans 115	4	4	4	4	4	4	4	4	4	4	4	4	4
Irr	8	1.441	Irrigation	20	23	36	36	38	32	35	37	36	32	29	22	31
Comm	5	1.442.15	Commercial Municipal	147	147	147	147	147	146	144	143	143	141	141	141	145
WP	16		Water Pumping	72	72	72	72	72	73	73	73	73	73	74	74	73
Lights	10	1.444.	Street Lighting	151	149	148	148	149	148	150	149	147	147	147	147	148
Temp	17		Temporary Service	3	3	3	5	7	6	7	9	7	8	6	8	6
Resale	11	1.447.	Resale	-	-	-	-	-	-	-	-	-	-	-	-	-
Own Use	20	1.442.3	Own Use	-	-	-	-	-	-	-	-	-	-	-	-	-
			17,337	17,299	17,329	17,347	17,365	17,424	17,453	17,467	17,399	17,375	17,360	17,343	17,375	

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 9 - Calculating Lighting Rates
post 34.5kV FBR Adjustment

0.00121 per kWh Adjustment for Lighting -- from Page 2, Part II

Private Area / Street Lighting (15-PAL-SL-D)

Private Area Light (Coop owned)

On Existing Pole			kWh Estimate		Resultant Rate	
100 W P.A.L. Cust 0%	@	\$11.06 /mo.	40	\$	0.04840	\$11.11 /mo.
100 W P.A.L. Cust 100%	@	\$4.32 /mo.	40	\$	0.04840	\$4.37 /mo.
150 W P.A.L. Cust 0%	@	\$17.58 /mo.	60	\$	0.07260	\$17.65 /mo.
150 W P.A.L. Cust 100%	@	\$6.12 /mo.	60	\$	0.07260	\$6.19 /mo.
200 W P.A.L. Cust 0%	@	\$19.82 /mo.	80	\$	0.09680	\$19.92 /mo.
200 W P.A.L. Cust 50%	@	\$13.59 /mo.	80	\$	0.09680	\$13.69 /mo.
200 W P.A.L. Cust 100%	@	\$7.63 /mo.	80	\$	0.09680	\$7.73 /mo.
On New Pole (Wood)						
100 W P.A.L. Cust 0%	@	\$18.30 /mo.	40	\$	0.04840	\$18.35 /mo.
100 W P.A.L. Cust 100%	@	\$4.79 /mo.	40	\$	0.04840	\$4.84 /mo.
150 W P.A.L. Cust 0%	@	\$20.44 /mo.	60	\$	0.07260	\$20.51 /mo.
150 W P.A.L. Cust 100%	@	\$6.29 /mo.	60	\$	0.07260	\$6.36 /mo.
200 W P.A.L. Cust 0%	@	\$21.99 /mo.	80	\$	0.09680	\$22.09 /mo.
200 W P.A.L. Cust 100%	@	\$7.76 /mo.	80	\$	0.09680	\$7.86 /mo.

Flood Lights

On Existing Pole						
150 W Flood Cust 0%	@	\$20.75 /mo.	60	\$	0.07260	\$20.82 /mo.
150 W Flood Cust 100%	@	\$6.32 /mo.	60	\$	0.07260	\$6.39 /mo.
400 W Flood Cust 0%	@	\$38.31 /mo.	160	\$	0.19360	\$38.50 /mo.
400 W Flood Cust 50%	@	\$26.03 /mo.	160	\$	0.19360	\$26.22 /mo.
400 W Flood Cust 100%	@	\$14.34 /mo.	160	\$	0.19360	\$14.53 /mo.
1000 W Flood M.H. Cust 0%	@	\$57.24 /mo.	402	\$	0.48642	\$57.73 /mo.
1000 W Flood M.H. Cust 100%	@	\$33.95 /mo.	402	\$	0.48642	\$34.44 /mo.
On New Pole (Wood)						
150 W P.A.L. Cust 0%	@	\$23.39 /mo.	60	\$	0.07260	\$23.46 /mo.
150 W P.A.L. Cust 100%	@	\$6.52 /mo.	60	\$	0.07260	\$6.59 /mo.
400 W P.A.L. Cust 0%	@	\$40.36 /mo.	160	\$	0.19360	\$40.55 /mo.
400 W P.A.L. Cust 100%	@	\$14.52 /mo.	160	\$	0.19360	\$14.71 /mo.
1000 W Flood M.H. Cust 0%	@	\$77.09 /mo.	402	\$	0.48642	\$77.58 /mo.
1000 W Flood M.H. Cust 100%	@	\$32.80 /mo.	402	\$	0.48642	\$33.29 /mo.

Street Lights

On Existing Pole						
100 W P.A.L. Cust 0%	@	\$12.25 /mo.	40	\$	0.04840	\$12.30 /mo.
100 W P.A.L. Cust 100%	@	\$4.41 /mo.	40	\$	0.04840	\$4.46 /mo.
150 W P.A.L. Cust 0%	@	\$14.52 /mo.	60	\$	0.07260	\$14.59 /mo.
150 W P.A.L. Cust 100%	@	\$5.91 /mo.	60	\$	0.07260	\$5.98 /mo.
200 W P.A.L. Cust 0%	@	\$17.87 /mo.	80	\$	0.09680	\$17.97 /mo.
200 W P.A.L. Cust 100%	@	\$7.49 /mo.	80	\$	0.09680	\$7.59 /mo.
On New Pole (Wood)						
100 W P.A.L. Cust 0%	@	\$18.30 /mo.	40	\$	0.04840	\$18.35 /mo.
100 W P.A.L. Cust 100%	@	\$4.79 /mo.	40	\$	0.04840	\$4.84 /mo.
150 W P.A.L. Cust 0%	@	\$20.44 /mo.	60	\$	0.07260	\$20.51 /mo.
150 W P.A.L. Cust 100%	@	\$6.29 /mo.	60	\$	0.07260	\$6.36 /mo.
200 W P.A.L. Cust 0%	@	\$21.99 /mo.	80	\$	0.09680	\$22.09 /mo.
200 W P.A.L. Cust 100%	@	\$7.76 /mo.	80	\$	0.09680	\$7.86 /mo.
On Existing Pole						
100 W Cobra Head Cust 0%	@	\$12.25 /mo.	40	\$	0.04840	\$12.30 /mo.
100 W Cobra Head Cust 100%	@	\$4.41 /mo.	40	\$	0.04840	\$4.46 /mo.
150 W Cobra Head Cust 0%	@	\$14.52 /mo.	60	\$	0.07260	\$14.59 /mo.
150 W Cobra Head Cust 100%	@	\$5.91 /mo.	60	\$	0.07260	\$5.98 /mo.
200 W Cobra Head Cust 0%	@	\$17.87 /mo.	80	\$	0.09680	\$17.97 /mo.
200 W Cobra Head Cust 100%	@	\$7.49 /mo.	80	\$	0.09680	\$7.59 /mo.
250 W Cobra Head Cust 0%	@	\$19.67 /mo.	100	\$	0.12100	\$19.79 /mo.
250 W Cobra Head Cust 100%	@	\$8.98 /mo.	100	\$	0.12100	\$9.10 /mo.
400 W Cobra Head Cust 0%	@	\$24.16 /mo.	160	\$	0.19360	\$24.35 /mo.
400 W Cobra Head Cust 100%	@	\$13.40 /mo.	160	\$	0.19360	\$13.59 /mo.
On New Pole (Wood)						
100 W Cobra Head Cust 0%	@	\$21.37 /mo.	40	\$	0.04840	\$21.42 /mo.
100 W Cobra Head Cust 100%	@	\$4.99 /mo.	40	\$	0.04840	\$5.04 /mo.
150 W Cobra Head Cust 0%	@	\$23.10 /mo.	60	\$	0.07260	\$23.17 /mo.
150 W Cobra Head Cust 100%	@	\$6.50 /mo.	60	\$	0.07260	\$6.57 /mo.
200 W Cobra Head Cust 0%	@	\$24.23 /mo.	80	\$	0.09680	\$24.33 /mo.
200 W Cobra Head Cust 100%	@	\$7.92 /mo.	80	\$	0.09680	\$8.02 /mo.
250 W Cobra Head Cust 0%	@	\$26.99 /mo.	100	\$	0.12100	\$27.11 /mo.
250 W Cobra Head Cust 100%	@	\$9.89 /mo.	100	\$	0.12100	\$10.01 /mo.
400 W Cobra Head Cust 0%	@	\$31.49 /mo.	160	\$	0.19360	\$31.68 /mo.
400 W Cobra Head Cust 100%	@	\$14.29 /mo.	160	\$	0.19360	\$14.48 /mo.
On New Pole (Steel)						
100 W Cobra Head Cust 0%	@	\$33.23 /mo.	40	\$	0.04840	\$33.28 /mo.
100 W Cobra Head Cust 100%	@	\$5.80 /mo.	40	\$	0.04840	\$5.85 /mo.
150 W Cobra Head Cust 0%	@	\$34.95 /mo.	60	\$	0.07260	\$35.02 /mo.
150 W Cobra Head Cust 100%	@	\$7.28 /mo.	60	\$	0.07260	\$7.35 /mo.
200 W Cobra Head Cust 0%	@	\$36.97 /mo.	80	\$	0.09680	\$37.07 /mo.
200 W Cobra Head Cust 100%	@	\$8.76 /mo.	80	\$	0.09680	\$8.86 /mo.
250 W Cobra Head Cust 0%	@	\$41.29 /mo.	100	\$	0.12100	\$41.41 /mo.
250 W Cobra Head Cust 100%	@	\$10.42 /mo.	100	\$	0.12100	\$10.54 /mo.
400 W Cobra Head Cust 0%	@	\$45.74 /mo.	160	\$	0.19360	\$45.93 /mo.
400 W Cobra Head Cust 100%	@	\$14.82 /mo.	160	\$	0.19360	\$15.01 /mo.

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Calculating Lighting Rates (Continued)
post- 34.5kV FBR Adjutment

0.00121 per kWh Adjustment for Lighting -- from Page 2, Part II

Security (Decorative) Lighting Service (15-DOL-I)

Coop Owned

Acorn

				kWh estimate		Resultant Rate
35 W HPS Cust 0%	@	\$24.92 /mo.	14 \$	0.01694	\$24.94 /mo.	
35 W HPS Cust 100%	@	\$3.68 /mo.	14 \$	0.01694	\$3.70 /mo.	
100 W HPS Cust 0%	@	\$36.49 /mo.	40 \$	0.04840	\$36.54 /mo.	
100 W HPS Cust 50%	@	\$21.04 /mo.	40 \$	0.04840	\$21.09 /mo.	
100 W HPS Cust 100%	@	\$6.29 /mo.	40 \$	0.04840	\$6.34 /mo.	
250 W HPS Cust 0%	@	\$42.78 /mo.	100 \$	0.12100	\$42.90 /mo.	
250 W HPS Cust 100%	@	\$10.85 /mo.	100 \$	0.12100	\$10.97 /mo.	

Single Globe

35 W HPS Cust 0%	@	\$19.26 /mo.	14 \$	0.01694	\$19.28 /mo.	
35 W HPS Cust 100%	@	\$3.29 /mo.	14 \$	0.01694	\$3.31 /mo.	
70 W HPS Cust 0%	@	\$31.72 /mo.	28 \$	0.03388	\$31.75 /mo.	
70 W HPS Cust 100%	@	\$5.12 /mo.	28 \$	0.03388	\$5.15 /mo.	
100 W HPS Cust 0%	@	\$32.90 /mo.	40 \$	0.04840	\$32.95 /mo.	
100 W HPS Cust 100%	@	\$6.06 /mo.	40 \$	0.04840	\$6.11 /mo.	
150 W HPS Cust 0%	@	\$34.62 /mo.	60 \$	0.07260	\$34.69 /mo.	
150 W HPS Cust 100%	@	\$7.56 /mo.	60 \$	0.07260	\$7.63 /mo.	

Multi Globe

70 W HPS Cust 0%	@	\$84.20 /mo.	140 \$	0.16940	\$84.37 /mo.	
70 W HPS Cust 100%	@	\$17.39 /mo.	140 \$	0.16940	\$17.56 /mo.	
100 W HPS Cust 0%	@	\$89.98 /mo.	200 \$	0.24200	\$90.22 /mo.	
100 W HPS Cust 100%	@	\$21.94 /mo.	200 \$	0.24200	\$22.18 /mo.	
150 W HPS Cust 0%	@	\$98.67 /mo.	300 \$	0.36300	\$99.03 /mo.	
150 W HPS Cust 100%	@	\$29.38 /mo.	300 \$	0.36300	\$29.74 /mo.	

Security (Decorative) Lighting Service (15-DOL-I)

Lantern

35 W HPS Cust 0%	@	\$22.48 /mo.	14 \$	0.01694	\$22.50 /mo.	
35 W HPS Cust 100%	@	\$3.53 /mo.	14 \$	0.01694	\$3.55 /mo.	
100 W HPS Cust 0%	@	\$39.39 /mo.	40 \$	0.04840	\$39.44 /mo.	
100 W HPS Cust 100%	@	\$6.47 /mo.	40 \$	0.04840	\$6.52 /mo.	
250 W HPS Cust 0%	@	\$45.37 /mo.	100 \$	0.12100	\$45.49 /mo.	
250 W HPS Cust 100%	@	\$11.01 /mo.	100 \$	0.12100	\$11.13 /mo.	

Shoebox

100 W HPS Cust 0%	@	\$45.99 /mo.	40 \$	0.04840	\$46.04 /mo.	
100 W HPS Cust 100%	@	\$6.91 /mo.	40 \$	0.04840	\$6.96 /mo.	
250 W HPS Cust 0%	@	\$51.82 /mo.	100 \$	0.12100	\$51.94 /mo.	
250 W HPS Cust 100%	@	\$11.45 /mo.	100 \$	0.12100	\$11.57 /mo.	
400 W HPS Cust 0%	@	\$57.09 /mo.	160 \$	0.19360	\$57.28 /mo.	
400W HPS Cust 100%	@	\$16.19 /mo.	160 \$	0.19360	\$16.38 /mo.	
800 W HPS Cust 0%	@	\$79.46 /mo.	320 \$	0.38720	\$79.85 /mo.	
800 W HPS Cust 100%	@	\$29.17 /mo.	320 \$	0.38720	\$29.56 /mo.	

Vapor Street Lighting Ornamental Service (15-OSL-V-I) Frozen

						Annual	Prior Annual
175 W MV	@	\$13.61 /mo.	63 \$	0.07623	\$13.69 /mo.	\$ 164.28	\$ 163.32
250 W MV	@	\$16.60 /mo.	95 \$	0.11495	\$16.71 /mo.	\$ 200.52	\$ 199.20
400 W MV	@	\$22.10 /mo.	151 \$	0.18271	\$22.28 /mo.	\$ 267.36	\$ 265.20
100 W HPS	@	\$12.25 /mo.	40 \$	0.04840	\$12.30 /mo.	\$ 147.60	\$ 147.00
150 W HPS	@	\$14.52 /mo.	60 \$	0.07260	\$14.59 /mo.	\$ 175.08	\$ 174.24
200 W HPS	@	\$17.87 /mo.	80 \$	0.09680	\$17.97 /mo.	\$ 215.64	\$ 214.44

Controlled Private Area Lighting (15-PAL-I) Frozen

						Annual	
175 W MV	@	\$12.43 /mo.	63 \$	0.07623	\$12.51 /mo.	\$ 150.12	\$ 149.16
400 W MV	@	\$24.06 /mo.	151 \$	0.18271	\$24.24 /mo.	\$ 290.88	\$ 288.72
400 W MV (Flood)	@	\$26.18 /mo.	151 \$	0.18271	\$26.36 /mo.	\$ 316.32	\$ 314.16
1000 W MV (Flood)	@	\$49.90 /mo.	355 \$	0.42955	\$50.33 /mo.	\$ 603.96	\$ 598.80
100 W HPS	@	\$11.06 /mo.	40 \$	0.04840	\$11.11 /mo.	\$ 133.32	\$ 132.72
200 W HPS	@	\$19.82 /mo.	80 \$	0.09680	\$19.92 /mo.	\$ 239.04	\$ 237.84
150 W HPS (Flood)	@	\$20.75 /mo.	60 \$	0.07260	\$20.82 /mo.	\$ 249.84	\$ 249.00
400 W HPS (Flood)	@	\$38.31 /mo.	160 \$	0.19360	\$38.50 /mo.	\$ 462.00	\$ 459.72

Street Lighting Service Dusk to Dawn (15-SL-I)

Inc 1000 lumen lamps	@	\$5.55 /mo.	34 \$	0.04114	\$5.59 /mo.	\$ 67.08	
MV 7000 lumen lamps	@	\$13.08 /mo.	63 \$	0.07623	\$13.16 /mo.	\$ 157.92	

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Workpaper 10 - Resultant Retail Rates

		Per kWh Rate Adj		Resultant per kWh Rates	
		from page 2, Part II, column (k)			
<u>Residential Service (15-RS)</u>					
<u>General Use</u>				\$0.00043	
Customer Charge	@ \$	13.77	/month		
Delivery Charge					
Summer - All kWh	@	\$0.12227	/kWh	\$0.12270	/kWh
Winter (Oct-May)	@	\$0.11127	/kWh	\$0.11170	/kWh
Energy Cost Adjustment	@		/kWh		
<u>Space Heating</u>				\$0.00024 * only for 2nd block in winter -- Space Heating are billed same rates as "Residential - General Use" except for usage occurring in the 2nd block in the Winter	
Customer Charge	@	\$13.77	/month		
Delivery Charge					
Summer - All kWh	@	\$0.12227	/kWh	\$0.12270	/kWh
Winter (Oct-May)					
0-800 kWh	@	\$0.11127	/kWh	\$0.11170	/kWh
801-5800 kWh	@	\$0.09689	/kWh	\$0.09713	/kWh
5801 kWh and above	@	\$0.11127	/kWh	\$0.11170	/kWh
Energy Cost Adjustment	@		/kWh		
<u>General Service Small (15-GSS)</u>				\$0.00047	
Customer Charge	@	\$22.44	/month		
Delivery Charge					
Summer - (July to Oct.)	@	\$0.09653	/kWh	\$0.09700	/kWh
Winter (Nov-Jun)	@	\$0.08553	/kWh	\$0.08600	/kWh
Energy Cost Adjustment	@		/kWh		
<u>General Service Large (15-GSL)</u>				\$0.00035	
Customer Charge	@	\$41.46	/month		
Demand Charge per kW>9					
Summer - (July to Oct.)	@	\$12.69	/kW		
Winter (Nov-Jun)	@	\$10.69	/kW		
Delivery Charge					
Summer - (July to Oct.)	@	\$0.07782	/kWh	\$0.07817	/kWh
Winter (Nov-Jun)	@	\$0.07782	/kWh	\$0.07817	/kWh
Energy Cost Adjustment	@		/kWh		
<u>General Service Space Heating</u>				\$0.00021 * for heating months only	
Demand Charge per kW>9					
Summer - (July to Oct.)	@	\$12.69	/kW		
Winter (Nov-Jun)	@	\$10.69	/kW		
Energy Charge					
GSL(GSL summer rate for non-heat mos)	@	\$0.07782	/kWh	\$0.07817	
GSS (GSS summer rate for non-heat mos)	@	\$0.09653	/kWh	\$0.09700	
Heating (November - June)	@	\$0.07201	/kWh	\$0.07222	/kWh
Energy Cost Adjustment					
<u>Industrial Service (15-IS)</u>				\$0.00020	
Customer Charge	@	\$102.15	/month		
Demand Charge per kW>10					
Summer - (July to Oct.)	@	\$14.18	/kW		
Winter (Nov-Jun)	@	\$11.18	/kW		
Delivery Charge					
Summer - (July to Oct.)	@	\$0.06923	/kWh	\$0.06943	/kWh
Winter (Nov-Jun)	@	\$0.06923	/kWh	\$0.06943	/kWh
Energy Cost Adjustment	@		/kWh		
<u>Industrial Service-Primary Discount</u>				2% discount off 14-IS	
Customer Charge	@	\$100.11	/month		
Demand Charge per kW>10					
Summer - (July to Oct.)	@	\$13.90	/kW		
Winter (Nov-Jun)	@	\$10.96	/kW		
Delivery Charge					
Summer - (July to Oct.)	@	\$0.06785	/kWh	\$0.06804	/kWh
Winter (Nov-Jun)	@	\$0.06785	/kWh	\$0.06804	/kWh
Energy Cost Adjustment	@		/kWh		

actual adj.	Gets up to	Still Need	Resultant Space Heat
\$0.00043	\$ 2,426	\$ 569	\$0.00024 *

actual adj.	Gets up to	Still Need	Space Heat only
\$0.00035	\$ 691	\$ 828	\$0.00021 *

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Workpaper 10 - Resultant Retail Rates (Continued)

			Per kWh Rate Adj	Resultant per kWh Rates
			from page 2, Part II, column (k)	
			same as 15-IS	

Interruptible Industrial Service (15-INT)

Customer Charge	@	\$100.62	/month		
Demand Charge per kW>10					
Non-Interruptible					
Summer - (July to Oct.)	@	\$14.18	/kW		
Winter (Nov-Jun)	@	\$11.18	/kW		
Interruptible					
Summer - (July to Oct.)	@	\$7.00	/kW		
Winter (Nov-Jun)	@	\$7.00	/kW		
Penalty					
Summer - (July to Oct.)	@	\$31.24	/kW		
Winter (Nov-Jun)	@	\$31.24	/kW		
Delivery Charge					
Summer - (July to Oct.)	@	\$0.06923	/kWh	\$0.06943	/kWh
Winter (Nov-Jun)	@	\$0.06923	/kWh	\$0.06943	/kWh
Energy Cost Adjustment	@		/kWh		

Real-Time Pricing (15-RTP)

Customer Charge	@	\$251.55	/month		
Delivery Charge	@	\$0.05748	/month		

Transmission Level Service (15-STR)

Service at 34.5 kV Voltage

Customer Charge	@	\$116.52	/month		
Demand Charge					
Demand Requirements			/kW		
OATT			/kW		
Local Access Charge		\$4.51	/kW	\$	4.70 /kW
Energy Charge					
Energy Charge			/kWh		
Energy Cost Adjustment			/kWh		
Delivery Charge	@	\$0.00181	/kWh	\$0.00181	/kWh

Service at 115 kV Voltage

Customer Charge	@	\$116.52	/month		
Demand Charge					
Demand Requirements	@		/kW		
OATT	@		/kW		
Energy Charge					
Energy Charge	@		/kWh		
Energy Cost Adjustment	@		/kWh		
Delivery Charge	@	\$0.00181	/kWh	\$0.00181	/kWh

Municipal Power Service (15-M-I)

Customer Charge	@	\$13.77	/month	\$0.00039	
Delivery Charge					
Summer - (July to Oct.)	@	\$0.11788	/kWh	\$0.11827	/kWh
Winter (Nov-Jun)	@	\$0.10688	/kWh	\$0.10727	/kWh
Energy Cost Adjustment	@		/kWh		

Water Pumping Service (15-WP)

Customer Charge	@	\$20.34	/month	\$0.00032	
Delivery Charge					
Summer - (July to Oct.)	@	\$0.11578	/kWh	\$0.11610	/kWh
Winter (Nov-Jun)	@	\$0.10478	/kWh	\$0.10510	/kWh
Energy Cost Adjustment	@		/kWh		

Irrigation Service (15-IP-I)

Demand Charge per HP contracted per year	@	\$38.01	/HP/yr.	\$0.00046	
Delivery Charge					
Summer - (July to Oct.)	@	\$0.09008	/kWh	\$0.09054	/kWh
Winter (Nov-Jun)	@	\$0.07908	/kWh	\$0.07954	/kWh
Energy Cost Adjustment	@		/kWh		

Temporary Service (15-CS)

Delivery Charge	@	\$0.22642	/kWh	\$0.22712	/kWh
Energy Cost Adjustment	@		/kWh		

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Work Paper 11 - Comparison of Revenue

(a)	(b)	(c)	(d)	(e)	(f)
Line		Test	34.5kV FBR		
No.	Rate Schedule	Year	Rates	Increase (Decrease)	
		Revenue	Revenue	Amount	Percent
		(\$)	(\$)	(\$)	(%)
1	Residential Service (RS)				
2	General Use	\$ 15,795,617	\$ 15,847,777	\$ 52,161	0.3%
3	Space Heating	\$ 974,090	\$ 977,085	\$ 2,995	0.3%
4	General Service Small (GSS)	\$ 1,973,424	\$ 1,980,151	\$ 6,727	0.3%
5	General Service Large (GSL)	\$ 15,910,577	\$ 15,956,151	\$ 45,574	0.3%
6	General Service Space Heating	\$ 604,356	\$ 605,875	\$ 1,519	0.3%
7	Industrial Service (IS)	\$ 3,062,258	\$ 3,068,635	\$ 6,377	0.2%
8	Interruptible Industrial Service (INT)	\$ -	\$ -	\$ -	0.0%
9	Real -Time Pricing (RTP)	\$ 346,853	\$ 346,853	\$ -	0.0%
10	Transmission Level Service (STR)	\$ 24,506,560	\$ 24,506,560	\$ -	0.0%
11	Municipal Power Service (M-I)	\$ 195,001	\$ 195,607	\$ 606	0.3%
12	Water Pumping Service (WP)	\$ 602,435	\$ 604,126	\$ 1,691	0.3%
13	Irrigation Service (IP-I)	\$ 244,652	\$ 245,479	\$ 827	0.3%
14	Temporary Service (CS)	\$ 18,172	\$ 18,237	\$ 65	0.4%
15	Lighting	\$ 1,015,807	\$ 1,020,960	\$ 5,153	0.5%
16	Total Retail Rates	\$ 65,249,803	\$ 65,373,497	\$ 123,694	0.2%

Southern Pioneer Electric Company
34.5kV Formula Based Rate
Comparison of Average Rate

(a)	(b)	(c)	(d)	(e)	(f)
Line		Energy	Average Rate		Increase
No.	Rate Class	Sales	Test Year	Rate Adj.	(Decrease)
		(kWh)	(¢/kWh)	(¢/kWh)	(%)
1	Residential Service (RS)				
2	General Use	120,254,071	13.14	13.18	0.3%
3	Space Heating	7,989,187	12.19	12.23	0.3%
4	General Service Small (GSS)	14,402,892	13.70	13.75	0.3%
5	General Service Large (GSL)	129,342,862	12.30	12.34	0.3%
6	General Service Space Heating	5,838,546	10.35	10.38	0.3%
7	Industrial Service (IS)	31,190,647	9.82	9.84	0.2%
8	Interruptible Industrial Service (INT)	-	N.A.	N.A.	N.A.
9	Real -Time Pricing (RTP)	6,543,983	5.30	5.30	0.0%
10	Transmission Level Service (STR)	394,232,064	6.22	6.22	0.0%
11	Municipal Power Service (M-I)	1,548,098	12.60	12.64	0.3%
12	Water Pumping Service (WP)	5,294,691	11.38	11.41	0.3%
13	Irrigation Service (IP-I)	1,780,952	13.74	13.78	0.3%
14	Temporary Service (CS)	92,534	19.64	19.71	0.4%
15	Lighting	4,260,217	23.84	23.96	0.5%

Prairie Land Electric Cooperative, Inc.

34.5kV FBR Protocols

A. PURPOSE

The 34.5kV FBR is an annual formula-based ratemaking mechanism. Its purpose is to allow for timely adjustments to the corresponding wholesale Local Access Charge ("LAC"), without the expense (public and private) and regulatory lag related to preparing and presenting a full rate case every year before the Kansas Corporation Commission ("Commission" or "KCC").

B. PROCESS

No later than May 1 (or the next Business Day when the Commission's offices are open if May 1 is not a Business Day) of each year, in accordance with its Commission-approved 34.5kV FBR, Prairie Land Electric Cooperative, Inc. ("Prairie Land") shall submit its 34.5kV FBR "Annual Update" filing for the calendar year just ended ("Test Year") in accordance with the procedures and calculations set forth herein (such date of submittal being the "Filing Date"). The filing will be provided to all parties of record in the Commission Docket approving the initial application for Prairie Land's 34.5kV FBR.

Upon filing, the Commission will determine the appropriate term for suspension of the Annual Update pursuant to K.S.A. 66-117. Notwithstanding this suspension, the Commission and Interveners will process the filing as set forth herein, unless ordered otherwise by the Commission. All discovery and confidentiality issues will be governed by Commission Discovery and Protective Orders, which will be issued immediately after the filing of the Annual Update. Upon receipt of the Annual Update filing, the Commission will also immediately issue a Procedural Order in accordance with the following guidelines, which are discussed in more detail in the following timeline:

Day 1	Day after the Filing Date
Day 40-45	A one-day Technical Conference will be set during this time, if necessary.
Day 50-55	A status telephone conference call will be set during this time.
Day 60	Staff and Interveners complete the review of the Annual Update, and the resultant LAC rate becomes effective; or, if necessary, Staff and/or Interveners shall file testimony as outlined hereafter.
Day 75	Prairie Land files rebuttal testimony, if necessary.
Day 90	Commission issues an order either approving the rate adjustments based upon the paper record or notifying the parties that an evidentiary hearing will be held.
Day 95-99	A one-day evidentiary hearing will be set during this time in case it is needed based upon the Commission 90 day Order.
Day 120	Final Order issued if the matter goes to evidentiary hearing.

The Commission Staff, and any other Intervener, will have 60 days from the Filing Date to review the Annual Update to determine if it results in just and reasonable rates that are in the public interest.

If within 60 days from the Filing Date, the Commission Staff and/or Interveners make a determination that indicates the results of the Annual Update filing are just and reasonable, the resultant LAC rate becomes effective for billing on the 60th day. Nothing in this provision is intended to deny Staff or Interveners the opportunity to file testimony should there be a relevant objection relating to the Annual Update, rather the purpose of allowing the LAC rate to go into effect is to relieve Staff and Interveners of the obligation to file formal testimony in the event formal testimony is unnecessary due to the lack of relevant objection to the Annual Update Filing.

If within 60 days from the Filing Date, Staff and/or Interveners make a determination that indicates the results of the Annual Update filing are unjust or unreasonable, Staff and Interveners shall make a reasonable attempt to resolve any issues surrounding the Annual Update informally with Prairie Land. The parties shall utilize the Technical Conference described below in Section F as a forum to try and resolve issues. If unable to resolve issues, Staff and Interveners shall file testimony within 60 days from the Filing Date, setting forth the reason the Annual Update would not result in a just and reasonable rate along with supporting documentation, and evidence supporting the position. Issues regarding the Annual Update filing that do not change or impact the rate resulting from the filing shall not be raised in testimony. A party who does not object to the Annual Update filing may file testimony in support of the filing within 60 days from the Filing Date. Questions, concerns or complaints regarding Prairie Land that are outside the scope of the Annual Update filing, or the rate resulting from the filing, shall not be raised in the Annual Update filing dockets. However, no party is precluded from raising such issues through the normal means available before the Commission.

If within 60 days of the Filing Date, Staff and/or Interveners file testimony regarding Prairie Land's Annual Update filing indicating the filing would result in unjust or unreasonable rate that is not in the public interest, then Prairie Land shall have the opportunity to file responsive testimony to said objection(s) within 75 days from the Filing Date. In this event, within 90 days from the Filing Date, the Commission will issue an order either approving the Annual Update filing based upon the paper record, or ordering an evidentiary hearing to be held to address the issues raised by the Annual Update filing. The hearing, if necessary, will proceed as expeditiously as possible, with the explicit goal of a Commission Order within 120 days from the Filing Date. This 120 day order date may be extended by Commission Order if circumstances arise supporting a deviation from the agreed 120-day time period.

The process outlined above does not prohibit interested parties from exercising any other rights they may have to bring a separate complaint or show cause proceeding before the Commission regarding Prairie Land, its rates or services.

C. CUSTOMER NOTIFICATION

Customers will receive notice of the Annual Update filing at the time it is made with the Commission.

Such notice may be made via electronic mail or bill insert and shall contain the following information:

1. The date the filing was made with the Commission and the docket number assigned.
2. The amount of the revenue adjustment sought.
3. The resulting rate impact.
4. A statement explaining that the rate adjustment is being made pursuant to the 34.5kV FBR, with a cite to the docket and the date of the Commission's Order approving the initial application for Prairie Land's 34.5kV FBR.
5. A Prairie Land contact person and phone number for questions.

D. CALCULATION

Each filing shall be based on actual results as presented in the sources listed below and utilizing the RUS Uniform System of Accounts: ¹

- December Operating Income Statement.
- December Trial Balance.
- December Payroll Journal.
- December Balance Sheet.

The calculation shall follow the form and format included in Exhibit 1-1 (blank) and Exhibits 2-1 (populated), as endorsed in the Commission Docket approving the initial application for Prairie Land's 34.5kV FBR. Specific details concerning the calculation are as follows:

1. Adjustments to actual results for the Test Year will be made as follows:
 - a. *Distribution Operation and Maintenance ("O&M") Expenses* – if distribution plant used to provide Local Access Delivery Service is present that is not already accounted for in a separate rate-making mechanism, the Distribution O&M Expenses will be adjusted consistent with the adjustment to *Other Deductions* per Commission policy in accordance with K.S.A. 66-101f(a) as defined below and which may be applicable.

¹ Reference United States Department of Agriculture Rural Utilities Service Bulletin 1767B-1 which contains the Uniform System of Accounts for Electric Borrowers.

- b. *Administrative and General Expense* (“A&G”) will be adjusted consistent with the adjustment to *Other Deductions* per Commission policy in accordance with K.S.A. 66-101f(a) as defined below and which may be applicable.
- c. *Depreciation* will be adjusted to reflect the depreciation expense expected for the calendar year immediately following the Test Year (“Budget Year”). Additionally, the Acquisition Premium (“AP”) amortization portion will be removed, if applicable.
- d. *Interest on Long-Term Debt* will be adjusted to reflect the interest on long-term debt expected for the Budget Year.
- e. *Interest Expense – Other* will be adjusted as necessary to reflect the amount of short-term interest expected for the Budget Year.
- f. *Interest Charged to Construction* will be adjusted as necessary to reflect the amount expected for the Budget Year.
- g. *Other Deductions* – If applicable, *Other Deductions* expense will be adjusted to reflect the exclusion of the items typically disallowed by the Commission, in whole or in part, per Commission policy in accordance with K.S.A. 66-101f(a) (i.e. dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses) and in a manner consistent with any other separate rate-making mechanism that Prairie Land may have in place at the time. As set forth below, Prairie Land will include with its filing a complete detailed listing, by account, of all dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses incurred during the Test Year, accompanied by the work paper detailing the calculation of the appropriate exclusion, in whole or in part. Each party may present to the Commission in their recommendation or testimony their position and reasoning in support of inclusion or disallowance of these items. It is expected that disagreement on these issues would not be grounds for requiring the case to go to evidentiary hearing, and that absent other issues supporting the need for the evidentiary hearing, these matters will be resolved by the Commission based upon the paper record.

Additionally, if applicable, the Acquisition Premium (“AP”) amortization portion will be removed from *Other Deductions*.
- h. *Debt Service Payments* for the Test Year shall be adjusted to reflect the interest and principal payments expected for the Budget Year. The debt service payments on said debt requirements will be calculated using an amortization schedule at the expected

borrowing rate(s) as specified in Prairie Land's loan covenants with its lender(s). The debt service payments will be determined within the context of Prairie Land's budget including the projected plant investments and cash flows needs.

2. The 34.5kV FBR is intended to apply only to the sub-transmission portion of Prairie Land's system. In order to accomplish this, the financial results submitted as part of the Annual Update filing should be adjusted to only include the costs associated with such facilities. The following categories of expenses will need to be adjusted to remove the portion not associated with these facilities before the LAC is calculated. The allocation method to be used is listed next to each category. This list is not necessarily exhaustive, and other allocations may be necessary. If additional items are identified, expense or labor items should be allocated using a Labor ratio ("LAB"), and Plant or Debt Service items should be allocated using a Net Plant ratio ("NP").² The LAB ratio is calculated as a ratio of Transmission Labor to Total Non-A&G Labor, calculated for the Test Year. The NP ratio is calculated as a ratio of Net Transmission Plant to total Net Plant, calculated for the Test Year, where the Net Transmission Plant includes a General Plant allocation based upon the LAB ratio. These allocators should be calculated and submitted annually with each Annual Update filing.
 - a. A&G Expenses: allocated on LAB ratio.
 - b. Depreciation and Amortization Expense: allocated on NP ratio.
 - c. Tax Expense (if/when applicable): allocated on NP ratio.
 - d. Other Deductions: allocated on NP ratio.
 - e. Interest on Long-Term Debt: allocated on NP ratio.
 - f. Interest-Other: allocated on NP ratio.
 - g. Principal Payments: allocated on NP ratio.
 - h. Offsets to Margin Requirements: allocated on NP ratio.
3. Margin – Prairie Land will utilize the 1.8 OTIER or 1.8 MDSC, calculated using National Rural Utilities Cooperative Finance Corporation ("CFC") formulas. The ratio resulting in greater margins will be used.

² If any distribution plant that provides Local Access Delivery Service is present as detailed in D.1.a above, Distribution O&M Expenses will be allocated using a Distribution O&M ratio ("DOM"). The DOM ratio is calculated as a ratio of Net Distribution Plant used in provision of Local Access Delivery Service to Total Distribution Plant. As applicable, this allocator should be calculated and submitted with Annual Update filings.

4. Determination of the LAC rate:

The Total 34.5kV FBR Revenue Requirement is determined by summing up the applicable operating expenses and margin requirement, as shown in Exhibit 1-1 and Exhibits 2-1 endorsed in the Commission Docket approving the initial application for Prairie Land's 34.5kV FBR. To arrive at the \$ per kW LAC rate, the Total Revenue Requirement is divided by the Total Billing Demand for the Test Year. Also, if applicable, a \$ per kilowatt-hour portion attributable to Property Tax Surcharge is subtracted from the unadjusted LAC rate to arrive at the final LAC.

E. FILING EXHIBITS

In support of the Annual Update filing, Prairie Land shall submit the following information:

1. An Annual Update filing containing the rate adjustment requested in compliance with the requirements of the Commission-approved 34.5kV FBR.
2. Prairie Land's Comparative Operating Income Statement and Balance Sheet, for the test year.
3. Completed formula as contained in Exhibit 1-1 endorsed in the Commission Docket approving the initial application for Prairie Land's 34.5kV FBR. In addition to the PDF version, each Annual Update filing shall be supplemented with a populated formula template in fully functional spreadsheets, with all work papers attached, showing the 34.5kV FBR calculations.
4. Trial Balance for the Test Year.
5. Payroll Journal for the Test Year.
6. Operating Budget for the Test Year.
7. Any other applicable supplemental schedules necessary to audit the filing for the Test Year.
8. A complete detailed accounting, by account, of all dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses incurred during the Test Year.
9. Proposed tariff sheets including the proposed rate adjustment.

If any of the reports or statements intended to be used as support for Prairie Land's upcoming Annual Update filing become available prior to the Filing Date, Prairie Land will provide to Staff and Interveners copies of such. All required information will be made accessible on Prairie Land's Box.net site or a similar service, with a notification provided to Staff and Interveners alerting them of when the data becomes available.

F. TECHNICAL CONFERENCE AND STATUS CALL

Within 35 days from the Filing Date Prairie Land will work with Staff and Interveners to schedule a one-day Technical Conference, if necessary, to be held within days 40-45 from the Filing Date. The Technical Conference will be held at the Company's home office. Prairie Land will make its staff available to review requested documents and respond to questions. The parties shall submit to Prairie Land at least 10 business days before the conference a list of questions and a list of documents that the parties want Prairie Land to be prepared to answer and produce, respectively, at the technical conference. If requested, Prairie Land will make available to Staff, Interveners and the parties' consultants who are unable to travel to the home office, access to the conference via "GoToMeeting" or a similar internet-based conference program.

Within days 50-55 from the Filing Date, Prairie Land will work with Staff and Interveners to schedule a telephone conference call to discuss the status of any outstanding issues with the Annual Update filing. If there are no outstanding issues to discuss, the parties will consider Staff's filing of a Report and Recommendation indicating the results of the Annual Update filing are just and reasonable.

G. MISCELLANEOUS PROVISIONS

1. Nothing in these Protocols limits or deprives Prairie Land, Staff of the Commission or any Intervener of any rights it may otherwise have under any applicable provision of applicable law. The provisions of the Protocols addressing review of and objection to of the Annual Update filings are not intended to, nor shall they be construed as limiting Prairie Land's, Staff of the Commission or any Intervener's rights under any applicable provision of applicable law.
2. Signatories who were a party to the original docket requesting the approval of the 34.5kV FBR will be considered automatically approved for intervention upon the filing of an Entry of Appearance in any individual Annual Update filing, provided they are not prohibited from participation by statute or otherwise.

H. DEFINITIONS

Budget Year shall mean the calendar year immediately following the Test Year.

CFC - National Rural Utilities Cooperative Finance Corporation.

Debt Service Payments means interest and principal payments made during the Test Year adjusted to reflect the interest and principal payments expected for the Budget Year, including both long-term and short-term debt.

Filing Date as defined in Section B of these 34.5kV FBR Protocols.

Form 7 means the December National Rural Utilities Cooperative Finance Corporation Financial and Statistical Report (CFC Form 7) that utilizes the RUS Uniform System of Accounts.

Intervener means a party which has been granted intervention by the Commission in Prairie Land's Annual Update filing or as provided in Section G(2).

KCC or Commission means the State Corporation Commission of the State of Kansas.

LAC means the Local Access Charge per kW demand rate for LADS over Prairie Land's sub-transmission system as defined in Prairie Land's corresponding Local Access Delivery Service tariff on file with the Commission.

Line Losses means real power losses associated with the Local Access Delivery Service. The applicable loss factor is specified within Prairie Land's Commission-approved Local Access Delivery Service tariff in effect during the Test Year.

Local Access Delivery Service ("LADS") means wholesale delivery service over Prairie Land's sub-transmission system.

MDSC means a Modified Debt Service Coverage ratio of cash flows to annual interest and principal payments on debt, calculated in accordance with the formula guidelines utilized in CFC Key Ratio Trend Analysis.

Monthly Billing Demand – as defined in Prairie Land's Commission-approved Local Access Delivery Service tariff in effect.

Monthly System Peak means the monthly maximum hourly demand on Prairie Land's Local Access Delivery System during the Test Year.

Net Plant means total Plant in Service as contained in all electric plant account per RUS Uniform System of Accounts less total Accumulated Reserves for Depreciation in account per RUS Uniform System of Accounts, where the account balances are determined by Prairie Land's year end trial balance for the Test Year.

Net Transmission Plant means the total plant in service used by Prairie Land for the provision of Local Access Service (including Transmission Plant in Prairie Land's accounts 350-359 per RUS Uniform System of Accounts; any Distribution Plant from accounts 360-373 per RUS Uniform System of Accounts that was allocated to the LAC, if applicable; plus any allocated General Plant from accounts 389-399 per RUS Uniform System of Accounts) minus the total amount of corresponding Accumulated Provision for Depreciation in account 108 per RUS Uniform System of Accounts. The account balances are determined by Prairie Land's year end trial balance for the Test Year.

Non-A&G Labor means the Test Year wages associated with all of the Operating Expenses except for the wages in connection with the Administrative and General Expense accounts 920-935 per RUS Uniform System of Accounts.

OTIER shall mean a ratio of Prairie Land's annual earnings before interest to its annual interest expense, calculated in accordance with the formula guidelines utilized in CFC Key Ratio Trend Analysis.

Total Billing Demand means the summation of Prairie Land's wholesale and retail customers' monthly billing demands for the Test Year (work paper detailing calculation

is contained in Prairie Land's work papers accompanying the 34.5kV FBR populated template).

Transmission Labor means the Test Year wages associated with the provision of the Local Access Service and are comprised of 100% of the wages associated with the Transmission Expense in accounts 560-573 per RUS Uniform System of Accounts and, if applicable, any allocated Distribution wages associated with the Distribution O&M Expense accounts 360-373 per RUS Uniform System of Accounts.

RUS Uniform Systems of Accounts is contained in the United States Department of Agriculture Rural Utilities Service Bulletin 1767B-1.

Test Year means the most recent full calendar year prior to the Filing Date.

The Victory Electric Cooperative Association, Inc.

34.5kV FBR Protocols

A. PURPOSE

The 34.5kV FBR is an annual formula-based ratemaking mechanism. Its purpose is to allow for timely adjustments to the corresponding wholesale Local Access Charge ("LAC"), without the expense (public and private) and regulatory lag related to preparing and presenting a full rate case every year before the Kansas Corporation Commission ("Commission" or "KCC").

B. PROCESS

No later than May 1 (or the next Business Day when the Commission's offices are open if May 1 is not a Business Day) of each year, in accordance with its Commission-approved 34.5kV FBR, The Victory Electric Cooperative Association, Inc. ("Victory") shall submit its 34.5kV FBR "Annual Update" filing for the calendar year just ended ("Test Year") in accordance with the procedures and calculations set forth herein (such date of submittal being the "Filing Date"). The filing will be provided to all parties of record in the Commission Docket approving the initial application for Victory's 34.5kV FBR.

Upon filing, the Commission will determine the appropriate term for suspension of the Annual Update pursuant to K.S.A. 66-117. Notwithstanding this suspension, the Commission Prand Interveners will process the filing as set forth herein, unless ordered otherwise by the Commission. All discovery and confidentiality issues will be governed by Commission Discovery and Protective Orders, which will be issued immediately after the filing of the Annual Update. Upon receipt of the Annual Update filing, the Commission will also immediately issue a Procedural Order in accordance with the following guidelines, which are discussed in more detail in the following timeline:

Day 1	Day after the Filing Date
Day 40-45	A one-day Technical Conference will be set during this time, if necessary.
Day 50-55	A status telephone conference call will be set during this time.
Day 60	Staff and Interveners complete the review of the Annual Update, and the resultant LAC rate becomes effective; or, if necessary, Staff and/or Interveners shall file testimony as outlined hereafter.
Day 75	Victory files rebuttal testimony, if necessary.
Day 90	Commission issues an order either approving the rate adjustments based upon the paper record or notifying the parties that an evidentiary hearing will be held.
Day 95-99	A one-day evidentiary hearing will be set during this time in case it is needed based upon the Commission 90 day Order.
Day 120	Final Order issued if the matter goes to evidentiary hearing.

The Commission Staff, and any other Intervener, will have 60 days from the Filing Date to review the Annual Update to determine if it results in just and reasonable rates that are in the public interest.

If within 60 days from the Filing Date, the Commission Staff and/or Interveners make a determination that indicates the results of the Annual Update filing are just and reasonable, the resultant LAC rate becomes effective for billing on the 60th day. Nothing in this provision is intended to deny Staff or Interveners the opportunity to file testimony should there be a relevant objection relating to the Annual Update, rather the purpose of allowing the LAC rate to go into effect is to relieve Staff and Interveners of the obligation to file formal testimony in the event formal testimony is unnecessary due to the lack of relevant objection to the Annual Update Filing.

If within 60 days from the Filing Date, Staff and/or Interveners make a determination that indicates the results of the Annual Update filing are unjust or unreasonable, Staff and Interveners shall make a reasonable attempt to resolve any issues surrounding the Annual Update informally with Victory. The parties shall utilize the Technical Conference described below in Section F as a forum to try and resolve issues. If unable to resolve issues, Staff and Interveners shall file testimony within 60 days from the Filing Date, setting forth the reason the Annual Update would not result in a just and reasonable rate along with supporting documentation, and evidence supporting the position. Issues regarding the Annual Update filing that do not change or impact the rate resulting from the filing shall not be raised in testimony. A party who does not object to the Annual Update filing may file testimony in support of the filing within 60 days from the Filing Date. Questions, concerns or complaints regarding Victory that are outside the scope of the Annual Update filing, or the rate resulting from the filing, shall not be raised in the Annual Update filing dockets. However, no party is precluded from raising such issues through the normal means available before the Commission.

If within 60 days of the Filing Date, Staff and/or Interveners file testimony regarding Victory's Annual Update filing indicating the filing would result in unjust or unreasonable rate that is not in the public interest, then Victory shall have the opportunity to file responsive testimony to said objection(s) within 75 days from the Filing Date. In this event, within 90 days from the Filing Date, the Commission will issue an order either approving the Annual Update filing based upon the paper record, or ordering an evidentiary hearing to be held to address the issues raised by the Annual Update filing. The hearing, if necessary, will proceed as expeditiously as possible, with the explicit goal of a Commission Order within 120 days from the Filing Date. This 120 day order date may be extended by Commission Order if circumstances arise supporting a deviation from the agreed 120-day time period.

The process outlined above does not prohibit interested parties from exercising any other rights they may have to bring a separate complaint or show cause proceeding before the Commission regarding Victory, its rates or services.

C. CUSTOMER NOTIFICATION

Customers will receive notice of the Annual Update filing at the time it is made with the Commission. Such notice may be made via electronic mail or bill insert and shall contain the following information:

1. The date the filing was made with the Commission and the docket number assigned.
2. The amount of the revenue adjustment sought.
3. The resulting rate impact.
4. A statement explaining that the rate adjustment is being made pursuant to the 34.5kV FBR, with a cite to the docket and the date of the Commission's Order approving the initial application for Victory's 34.5kV FBR.
5. A Victory contact person and phone number for questions.

D. CALCULATION

Each filing shall be based on actual results as presented in the sources listed below and utilizing the RUS Uniform System of Accounts: ¹

- December Operating Income Statement.
- December Trial Balance.
- December Payroll Journal.
- December Balance Sheet.

The calculation shall follow the form and format included in Exhibit 1-1 (blank) and Exhibits 2-1 (populated), as endorsed in the Commission Docket approving the initial application for Victory's 34.5kV FBR. Specific details concerning the calculation are as follows:

1. Adjustments to actual results for the Test Year will be made as follows:
 - a. *Distribution Operation and Maintenance ("O&M") Expenses* – if distribution plant used to provide Local Access Delivery Service is present that is not already accounted for in a separate rate-making mechanism, the Distribution O&M Expenses will be adjusted consistent with the adjustment to *Other Deductions* per Commission policy in accordance with K.S.A. 66-101f(a) as defined below and which may be applicable.
 - b. *Administrative and General Expense ("A&G")* will be adjusted consistent with the adjustment to *Other Deductions* per

¹ Reference United States Department of Agriculture Rural Utilities Service Bulletin 1767B-1 which contains the Uniform System of Accounts for Electric Borrowers.

Commission policy in accordance with K.S.A. 66-101f(a) as defined below and which may be applicable.

- c. *Depreciation* will be adjusted to reflect the depreciation expense expected for the calendar year immediately following the Test Year ("Budget Year"). Additionally, the Acquisition Premium ("AP") amortization portion will be removed, if applicable.
- d. *Interest on Long-Term Debt* will be adjusted to reflect the interest on long-term debt expected for the Budget Year.
- e. *Interest Expense – Other* will be adjusted as necessary to reflect the amount of short-term interest expected for the Budget Year.
- f. *Interest Charged to Construction* will be adjusted as necessary to reflect the amount expected for the Budget Year.
- g. *Other Deductions* – If applicable, *Other Deductions* expense will be adjusted to reflect the exclusion of the items typically disallowed by the Commission, in whole or in part, per Commission policy in accordance with K.S.A. 66-101f(a) (i.e. dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses) and in a manner consistent with any other separate rate-making mechanism that Victory may have in place at the time. As set forth below, Victory will include with its filing a complete detailed listing, by account, of all dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses incurred during the Test Year, accompanied by the work paper detailing the calculation of the appropriate exclusion, in whole or in part. Each party may present to the Commission in their recommendation or testimony their position and reasoning in support of inclusion or disallowance of these items. It is expected that disagreement on these issues would not be grounds for requiring the case to go to evidentiary hearing, and that absent other issues supporting the need for the evidentiary hearing, these matters will be resolved by the Commission based upon the paper record.

Additionally, if applicable, the Acquisition Premium ("AP") amortization portion will be removed from Other Deductions.

- h. *Debt Service Payments* for the Test Year shall be adjusted to reflect the interest and principal payments expected for the Budget Year. The debt service payments on said debt requirements will be calculated using an amortization schedule at the expected borrowing rate(s) as specified in Victory's loan covenants with its lender(s). The debt service payments will be determined within the context of Victory's budget including the projected plant investments and cash flows needs.

2. The 34.5kV FBR is intended to apply only to the sub-transmission portion of Victory's system. In order to accomplish this, the financial results submitted as part of the Annual Update filing should be adjusted to only include the costs associated with such facilities. The following categories of expenses will need to be adjusted to remove the portion not associated with these facilities before the LAC is calculated. The allocation method to be used is listed next to each category. This list is not necessarily exhaustive, and other allocations may be necessary. If additional items are identified, expense or labor items should be allocated using a Labor ratio ("LAB"), and Plant or Debt Service items should be allocated using a Net Plant ratio ("NP").² The LAB ratio is calculated as a ratio of Transmission Labor to Total Non-A&G Labor, calculated for the Test Year. The NP ratio is calculated as a ratio of Net Transmission Plant to total Net Plant, calculated for the Test Year, where the Net Transmission Plant includes a General Plant allocation based upon the LAB ratio. These allocators should be calculated and submitted annually with each Annual Update filing.
 - a. A&G Expenses: allocated on LAB ratio.
 - b. Depreciation and Amortization Expense: allocated on NP ratio.
 - c. Tax Expense (if/when applicable): allocated on NP ratio.
 - d. Other Deductions: allocated on NP ratio.
 - e. Interest on Long-Term Debt: allocated on NP ratio.
 - f. Interest-Other: allocated on NP ratio.
 - g. Principal Payments: allocated on NP ratio.
 - h. Offsets to Margin Requirements: allocated on NP ratio.
3. Margin – Victory will utilize the 1.8 OTIER or 1.8 MDSC, calculated using National Rural Utilities Cooperative Finance Corporation ("CFC") formulas. The ratio resulting in greater margins will be used.
4. Determination of the LAC rate:

The Total 34.5kV FBR Revenue Requirement is determined by summing up the applicable operating expenses and margin requirement, as shown in Exhibit 1-1 and Exhibits 2-1 endorsed in the Commission Docket approving the initial application for Victory's 34.5kV FBR. To arrive at the \$ per kW LAC rate, the Total Revenue Requirement is divided by the Total Billing Demand for the Test

² If any distribution plant that provides Local Access Delivery Service is present as detailed in D.1.a above, Distribution O&M Expenses will be allocated using a Distribution O&M ratio ("DOM"). The DOM ratio is calculated as a ratio of Net Distribution Plant used in provision of Local Access Delivery Service to Total Distribution Plant. As applicable, this allocator should be calculated and submitted with Annual Update filings.

Year. Also, if applicable, a \$ per kilowatt-hour portion attributable to Property Tax Surcharge is subtracted from the unadjusted LAC rate to arrive at the final LAC.

E. FILING EXHIBITS

In support of the Annual Update filing, Victory shall submit the following information:

1. An Annual Update filing containing the rate adjustment requested in compliance with the requirements of the Commission-approved 34.5kV FBR.
2. Victory's Comparative Operating Income Statement and Balance Sheet, for the test year.
3. Completed formula as contained in Exhibit 1-1 endorsed in the Commission Docket approving the initial application for Victory's 34.5kV FBR. In addition to the PDF version, each Annual Update filing shall be supplemented with a populated formula template in fully functional spreadsheets, with all work papers attached, showing the 34.5kV FBR calculations.
4. Trial Balance for the Test Year.
5. Payroll Journal for the Test Year.
6. Operating Budget for the Test Year.
7. Any other applicable supplemental schedules necessary to audit the filing for the Test Year.
8. A complete detailed accounting, by account, of all dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses incurred during the Test Year.
9. Proposed tariff sheets including the proposed rate adjustment.

If any of the reports or statements intended to be used as support for Victory's upcoming Annual Update filing become available prior to the Filing Date, Victory will provide to Staff and Interveners copies of such. All required information will be made accessible on Victory's Box.net site or a similar service, with a notification provided to Staff and Interveners alerting them of when the data becomes available.

F. TECHNICAL CONFERENCE AND STATUS CALL

Within 35 days from the Filing Date Victory will work with Staff and Interveners to schedule a one-day Technical Conference, if necessary, to be held within days 40-45 from the Filing Date. The Technical Conference will be held at the Company's home office. Victory will make its staff available to review requested documents and respond to questions. The parties shall submit to Victory at least 10 business days before the conference a list of questions and a list of documents that the parties want Victory to be prepared to answer and produce, respectively, at the technical conference. If requested, Victory will make available to Staff, Interveners and the parties' consultants who are

unable to travel to the home office, access to the conference via “GoToMeeting” or a similar internet-based conference program.

Within days 50-55 from the Filing Date, Victory will work with Staff and Interveners to schedule a telephone conference call to discuss the status of any outstanding issues with the Annual Update filing. If there are no outstanding issues to discuss, the parties will consider Staff’s filing of a Report and Recommendation indicating the results of the Annual Update filing are just and reasonable.

G. MISCELLANEOUS PROVISIONS

1. Nothing in these Protocols limits or deprives Victory, Staff of the Commission or any Intervener of any rights it may otherwise have under any applicable provision of applicable law. The provisions of the Protocols addressing review of and objection to of the Annual Update filings are not intended to, nor shall they be construed as limiting Victory’s, Staff of the Commission or any Intervener’s rights under any applicable provision of applicable law.
2. Signatories who were a party to the original docket requesting the approval of the 34.5kV FBR will be considered automatically approved for intervention upon the filing of an Entry of Appearance in any individual Annual Update filing, provided they are not prohibited from participation by statute or otherwise.

H. DEFINITIONS

Budget Year shall mean the calendar year immediately following the Test Year.

CFC - National Rural Utilities Cooperative Finance Corporation.

Debt Service Payments means interest and principal payments made during the Test Year adjusted to reflect the interest and principal payments expected for the Budget Year, including both long-term and short-term debt.

Filing Date as defined in Section B of these 34.5kV FBR Protocols.

Form 7 means the December National Rural Utilities Cooperative Finance Corporation Financial and Statistical Report (CFC Form 7) that utilizes the RUS Uniform System of Accounts.

Intervener means a party which has been granted intervention by the Commission in Victory’s Annual Update filing or as provided in Section G(2).

KCC or Commission means the State Corporation Commission of the State of Kansas.

LAC means the Local Access Charge per kW demand rate for LADS over Victory’s sub-transmission system as defined in Victory’s corresponding Local Access Delivery Service tariff on file with the Commission.

Line Losses means real power losses associated with the Local Access Delivery Service. The applicable loss factor is specified within Victory’s Commission-approved Local Access Delivery Service tariff in effect during the Test Year.

Local Access Delivery Service (“LADS”) means wholesale delivery service over Victory’s sub-transmission system.

MDSC means a Modified Debt Service Coverage ratio of cash flows to annual interest and principal payments on debt, calculated in accordance with the formula guidelines utilized in CFC Key Ratio Trend Analysis.

Monthly Billing Demand – as defined in Victory’s Commission-approved Local Access Delivery Service tariff in effect.

Monthly System Peak means the monthly maximum hourly demand on Victory’s Local Access Delivery System during the Test Year.

Net Plant means total Plant in Service as contained in all electric plant account per RUS Uniform System of Accounts less total Accumulated Reserves for Depreciation in account per RUS Uniform System of Accounts, where the account balances are determined by Victory’s year end trial balance for the Test Year.

Net Transmission Plant means the total plant in service used by Victory for the provision of Local Access Service (including Transmission Plant in Victory’s accounts 350-359 per RUS Uniform System of Accounts; any Distribution Plant from accounts 360-373 per RUS Uniform System of Accounts that was allocated to the LAC, if applicable; plus any allocated General Plant from accounts 389-399 per RUS Uniform System of Accounts) minus the total amount of corresponding Accumulated Provision for Depreciation in account 108 per RUS Uniform System of Accounts. The account balances are determined by Victory’s year end trial balance for the Test Year.

Non-A&G Labor means the Test Year wages associated with all of the Operating Expenses except for the wages in connection with the Administrative and General Expense accounts 920-935 per RUS Uniform System of Accounts.

OTIER shall mean a ratio of Victory’s annual earnings before interest to its annual interest expense, calculated in accordance with the formula guidelines utilized in CFC Key Ratio Trend Analysis.

Total Billing Demand means the summation of Victory’s wholesale and retail customers’ monthly billing demands for the Test Year (work paper detailing calculation is contained in Victory’s work papers accompanying the 34.5kV FBR populated template).

Transmission Labor means the Test Year wages associated with the provision of the Local Access Service and are comprised of 100% of the wages associated with the Transmission Expense in accounts 560-573 per RUS Uniform System of Accounts and, if applicable, any allocated Distribution wages associated with the Distribution O&M Expense accounts 360-373 per RUS Uniform System of Accounts.

RUS Uniform Systems of Accounts is contained in the United States Department of Agriculture Rural Utilities Service Bulletin 1767B-1.

Test Year means the most recent full calendar year prior to the Filing Date.

Western Electric Cooperative, Inc.

34.5kV FBR Protocols

A. PURPOSE

The 34.5kV FBR is an annual formula-based ratemaking mechanism. Its purpose is to allow for timely adjustments to the corresponding wholesale Local Access Charge ("LAC"), without the expense (public and private) and regulatory lag related to preparing and presenting a full rate case every year before the Kansas Corporation Commission ("Commission" or "KCC").

B. PROCESS

No later than May 1 (or the next Business Day when the Commission's offices are open if May 1 is not a Business Day) of each year, in accordance with its Commission-approved 34.5kV FBR, Western Electric Cooperative, Inc. ("Western") shall submit its 34.5kV FBR "Annual Update" filing for the calendar year just ended ("Test Year") in accordance with the procedures and calculations set forth herein (such date of submittal being the "Filing Date"). The filing will be provided to all parties of record in the Commission Docket approving the initial application for Western's 34.5kV FBR.

Upon filing, the Commission will determine the appropriate term for suspension of the Annual Update pursuant to K.S.A. 66-117. Notwithstanding this suspension, the Commission and Interveners will process the filing as set forth herein, unless ordered otherwise by the Commission. All discovery and confidentiality issues will be governed by Commission Discovery and Protective Orders, which will be issued immediately after the filing of the Annual Update. Upon receipt of the Annual Update filing, the Commission will also immediately issue a Procedural Order in accordance with the following guidelines, which are discussed in more detail in the following timeline:

Day 1	Day after the Filing Date
Day 40-45	A one-day Technical Conference will be set during this time, if necessary.
Day 50-55	A status telephone conference call will be set during this time.
Day 60	Staff and Interveners complete the review of the Annual Update, and the resultant LAC rate becomes effective; or, if necessary, Staff and/or Interveners shall file testimony as outlined hereafter.
Day 75	Western files rebuttal testimony, if necessary.
Day 90	Commission issues an order either approving the rate adjustments based upon the paper record or notifying the parties that an evidentiary hearing will be held.
Day 95-99	A one-day evidentiary hearing will be set during this time in case it is needed based upon the Commission 90 day Order.
Day 120	Final Order issued if the matter goes to evidentiary hearing.

The Commission Staff, and any other Intervener, will have 60 days from the Filing Date to review the Annual Update to determine if it results in just and reasonable rates that are in the public interest.

If within 60 days from the Filing Date, the Commission Staff and/or Interveners make a determination that indicates the results of the Annual Update filing are just and reasonable, the resultant LAC rate becomes effective for billing on the 60th day. Nothing in this provision is intended to deny Staff or Interveners the opportunity to file testimony should there be a relevant objection relating to the Annual Update, rather the purpose of allowing the LAC rate to go into effect is to relieve Staff and Interveners of the obligation to file formal testimony in the event formal testimony is unnecessary due to the lack of relevant objection to the Annual Update Filing.

If within 60 days from the Filing Date, Staff and/or Interveners make a determination that indicates the results of the Annual Update filing are unjust or unreasonable, Staff and Interveners shall make a reasonable attempt to resolve any issues surrounding the Annual Update informally with Western. The parties shall utilize the Technical Conference described below in Section F as a forum to try and resolve issues. If unable to resolve issues, Staff and Interveners shall file testimony within 60 days from the Filing Date, setting forth the reason the Annual Update would not result in a just and reasonable rate along with supporting documentation, and evidence supporting the position. Issues regarding the Annual Update filing that do not change or impact the rate resulting from the filing shall not be raised in testimony. A party who does not object to the Annual Update filing may file testimony in support of the filing within 60 days from the Filing Date. Questions, concerns or complaints regarding Western that are outside the scope of the Annual Update filing, or the rate resulting from the filing, shall not be raised in the Annual Update filing dockets. However, no party is precluded from raising such issues through the normal means available before the Commission.

If within 60 days of the Filing Date, Staff and/or Interveners file testimony regarding Western's Annual Update filing indicating the filing would result in unjust or unreasonable rate that is not in the public interest, then Western shall have the opportunity to file responsive testimony to said objection(s) within 75 days from the Filing Date. In this event, within 90 days from the Filing Date, the Commission will issue an order either approving the Annual Update filing based upon the paper record, or ordering an evidentiary hearing to be held to address the issues raised by the Annual Update filing. The hearing, if necessary, will proceed as expeditiously as possible, with the explicit goal of a Commission Order within 120 days from the Filing Date. This 120 day order date may be extended by Commission Order if circumstances arise supporting a deviation from the agreed 120-day time period.

The process outlined above does not prohibit interested parties from exercising any other rights they may have to bring a separate complaint or show cause proceeding before the Commission regarding Western, its rates or services.

C. CUSTOMER NOTIFICATION

Customers will receive notice of the Annual Update filing at the time it is made with the Commission.

Such notice may be made via electronic mail or bill insert and shall contain the following information:

1. The date the filing was made with the Commission and the docket number assigned.
2. The amount of the revenue adjustment sought.
3. The resulting rate impact.
4. A statement explaining that the rate adjustment is being made pursuant to the 34.5kV FBR, with a cite to the docket and the date of the Commission's Order approving the initial application for Western's 34.5kV FBR.
5. A Western contact person and phone number for questions.

D. CALCULATION

Each filing shall be based on actual results as presented in the sources listed below and utilizing the RUS Uniform System of Accounts: ¹

- December Operating Income Statement.
- December Trial Balance.
- December Payroll Journal.
- December Balance Sheet.

The calculation shall follow the form and format included in Exhibit 1-1 (blank) and Exhibits 2-1 (populated), as endorsed in the Commission Docket approving the initial application for Western's 34.5kV FBR. Specific details concerning the calculation are as follows:

1. Adjustments to actual results for the Test Year will be made as follows:
 - a. *Distribution Operation and Maintenance ("O&M") Expenses* – if distribution plant used to provide Local Access Delivery Service is present that is not already accounted for in a separate rate-making mechanism, the Distribution O&M Expenses will be adjusted consistent with the adjustment to *Other Deductions* per Commission policy in accordance with K.S.A. 66-101f(a) as defined below and which may be applicable.
 - b. *Administrative and General Expense ("A&G")* will be adjusted consistent with the adjustment to *Other Deductions* per

¹ Reference United States Department of Agriculture Rural Utilities Service Bulletin 1767B-1 which contains the Uniform System of Accounts for Electric Borrowers.

Commission policy in accordance with K.S.A. 66-101f(a) as defined below and which may be applicable.

- c. *Depreciation* will be adjusted to reflect the depreciation expense expected for the calendar year immediately following the Test Year ("Budget Year"). Additionally, the Acquisition Premium ("AP") amortization portion will be removed, if applicable.
- d. *Interest on Long-Term Debt* will be adjusted to reflect the interest on long-term debt expected for the Budget Year.
- e. *Interest Expense – Other* will be adjusted as necessary to reflect the amount of short-term interest expected for the Budget Year.
- f. *Interest Charged to Construction* will be adjusted as necessary to reflect the amount expected for the Budget Year.
- g. *Other Deductions* – If applicable, *Other Deductions* expense will be adjusted to reflect the exclusion of the items typically disallowed by the Commission, in whole or in part, per Commission policy in accordance with K.S.A. 66-101f(a) (i.e. dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses) and in a manner consistent with any other separate rate-making mechanism that Western may have in place at the time. As set forth below, Western will include with its filing a complete detailed listing, by account, of all dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses incurred during the Test Year, accompanied by the work paper detailing the calculation of the appropriate exclusion, in whole or in part. Each party may present to the Commission in their recommendation or testimony their position and reasoning in support of inclusion or disallowance of these items. It is expected that disagreement on these issues would not be grounds for requiring the case to go to evidentiary hearing, and that absent other issues supporting the need for the evidentiary hearing, these matters will be resolved by the Commission based upon the paper record.

Additionally, if applicable, the Acquisition Premium ("AP") amortization portion will be removed from Other Deductions.

- h. *Debt Service Payments* for the Test Year shall be adjusted to reflect the interest and principal payments expected for the Budget Year. The debt service payments on said debt requirements will be calculated using an amortization schedule at the expected borrowing rate(s) as specified in Western's loan covenants with its lender(s). The debt service payments will be determined within the context of Western's budget including the projected plant investments and cash flows needs.

2. The 34.5kV FBR is intended to apply only to the sub-transmission portion of Western's system. In order to accomplish this, the financial results submitted as part of the Annual Update filing should be adjusted to only include the costs associated with such facilities. The following categories of expenses will need to be adjusted to remove the portion not associated with these facilities before the LAC is calculated. The allocation method to be used is listed next to each category. This list is not necessarily exhaustive, and other allocations may be necessary. If additional items are identified, expense or labor items should be allocated using a Labor ratio ("LAB"), and Plant or Debt Service items should be allocated using a Net Plant ratio ("NP").² The LAB ratio is calculated as a ratio of Transmission Labor to Total Non-A&G Labor, calculated for the Test Year. The NP ratio is calculated as a ratio of Net Transmission Plant to total Net Plant, calculated for the Test Year, where the Net Transmission Plant includes a General Plant allocation based upon the LAB ratio. These allocators should be calculated and submitted annually with each Annual Update filing.
 - a. A&G Expenses: allocated on LAB ratio.
 - b. Depreciation and Amortization Expense: allocated on NP ratio.
 - c. Tax Expense (if/when applicable): allocated on NP ratio.
 - d. Other Deductions: allocated on NP ratio.
 - e. Interest on Long-Term Debt: allocated on NP ratio.
 - f. Interest-Other: allocated on NP ratio.
 - g. Principal Payments: allocated on NP ratio.
 - h. Offsets to Margin Requirements: allocated on NP ratio.
3. Margin – Western will utilize the 1.8 OTIER or 1.8 MDSC, calculated using National Rural Utilities Cooperative Finance Corporation ("CFC") formulas. The ratio resulting in greater margins will be used.
4. Determination of the LAC rate:

The Total 34.5kV FBR Revenue Requirement is determined by summing up the applicable operating expenses and margin requirement, as shown in Exhibit 1-1 and Exhibits 2-1 endorsed in the Commission Docket approving the initial application for Western's 34.5kV FBR. To arrive at the \$ per kW LAC rate, the Total Revenue Requirement is divided by the Total Billing Demand for the Test Year. Also, if applicable, a \$ per kilowatt-hour portion attributable to Property Tax Surcharge is subtracted from the unadjusted LAC rate to arrive at the final LAC.

² If any distribution plant that provides Local Access Delivery Service is present as detailed in D.1.a above, Distribution O&M Expenses will be allocated using a Distribution O&M ratio ("DOM"). The DOM ratio is calculated as a ratio of Net Distribution Plant used in provision of Local Access Delivery Service to Total Distribution Plant. As applicable, this allocator should be calculated and submitted with Annual Update filings.

E. FILING EXHIBITS

In support of the Annual Update filing, Western shall submit the following information:

1. An Annual Update filing containing the rate adjustment requested in compliance with the requirements of the Commission-approved 34.5kV FBR.
2. Western's Comparative Operating Income Statement and Balance Sheet, for the test year.
3. Completed formula as contained in Exhibit 1-1 endorsed in the Commission Docket approving the initial application for Western's 34.5kV FBR. In addition to the PDF version, each Annual Update filing shall be supplemented with a populated formula template in fully functional spreadsheets, with all work papers attached, showing the 34.5kV FBR calculations.
4. Trial Balance for the Test Year.
5. Payroll Journal for the Test Year.
6. Operating Budget for the Test Year.
7. Any other applicable supplemental schedules necessary to audit the filing for the Test Year.
8. A complete detailed accounting, by account, of all dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses incurred during the Test Year.
9. Proposed tariff sheets including the proposed rate adjustment.

If any of the reports or statements intended to be used as support for Western's upcoming Annual Update filing become available prior to the Filing Date, Western will provide to Staff and Interveners copies of such. All required information will be made accessible on Western's Box.net site or a similar service, with a notification provided to Staff and Interveners alerting them of when the data becomes available.

F. TECHNICAL CONFERENCE AND STATUS CALL

Within 35 days from the Filing Date Western will work with Staff and Interveners to schedule a one-day Technical Conference, if necessary, to be held within days 40-45 from the Filing Date. The Technical Conference will be held at the Company's home office. Western will make its staff available to review requested documents and respond to questions. The parties shall submit to Western at least 10 business days before the conference a list of questions and a list of documents that the parties want Western to be prepared to answer and produce, respectively, at the technical conference. If requested, Western will make available to Staff, Interveners and the parties' consultants who are unable to travel to the home office, access to the conference via "GoToMeeting" or a similar internet-based conference program.

Within days 50-55 from the Filing Date, Western will work with Staff and Interveners to schedule a telephone conference call to discuss the status of any outstanding issues with the Annual Update filing. If there are no outstanding issues to discuss, the parties will consider Staff's filing of a Report and Recommendation indicating the results of the Annual Update filing are just and reasonable.

G. MISCELLANEOUS PROVISIONS

1. Nothing in these Protocols limits or deprives Western, Staff of the Commission or any Intervener of any rights it may otherwise have under any applicable provision of applicable law. The provisions of the Protocols addressing review and objection to the Annual Update filings are not intended to, nor shall they be construed as limiting Western's, Staff of the Commission or any Intervener's rights under any applicable provision of applicable law.
2. Signatories who were a party to the original docket requesting the approval of the 34.5kV FBR will be considered automatically approved for intervention upon the filing of an Entry of Appearance in any individual Annual Update filing, provided they are not prohibited from participation by statute or otherwise.

H. DEFINITIONS

Budget Year shall mean the calendar year immediately following the Test Year.

CFC - National Rural Utilities Cooperative Finance Corporation.

Debt Service Payments means interest and principal payments made during the Test Year adjusted to reflect the interest and principal payments expected for the Budget Year, including both long-term and short-term debt.

Filing Date as defined in Section B of these 34.5kV FBR Protocols.

Form 7 means the December National Rural Utilities Cooperative Finance Corporation Financial and Statistical Report (CFC Form 7) that utilizes the RUS Uniform System of Accounts.

Intervener means a party which has been granted intervention by the Commission in Western's Annual Update filing or as provided in Section G(2).

KCC or Commission means the State Corporation Commission of the State of Kansas.

LAC means the Local Access Charge per kW demand rate for LADS over Western's sub-transmission system as defined in Western's corresponding Local Access Delivery Service tariff on file with the Commission.

Line Losses means real power losses associated with the Local Access Delivery Service. The applicable loss factor is specified within Western's Commission-approved Local Access Delivery Service tariff in effect during the Test Year.

Local Access Delivery Service ("LADS") means wholesale delivery service over Western's sub-transmission system.

MDSC means a Modified Debt Service Coverage ratio of cash flows to annual interest and principal payments on debt, calculated in accordance with the formula guidelines utilized in CFC Key Ratio Trend Analysis.

Monthly Billing Demand – as defined in Western’s Commission-approved Local Access Delivery Service tariff in effect.

Monthly System Peak means the monthly maximum hourly demand on Western’s Local Access Delivery System during the Test Year.

Net Plant means total Plant in Service as contained in all electric plant account per RUS Uniform System of Accounts less total Accumulated Reserves for Depreciation in account per RUS Uniform System of Accounts, where the account balances are determined by Western’s year end trial balance for the Test Year.

Net Transmission Plant means the total plant in service used by Western for the provision of Local Access Service (including Transmission Plant in Western’s accounts 350-359 per RUS Uniform System of Accounts; any Distribution Plant from accounts 360-373 per RUS Uniform System of Accounts that was allocated to the LAC, if applicable; plus any allocated General Plant from accounts 389-399 per RUS Uniform System of Accounts) minus the total amount of corresponding Accumulated Provision for Depreciation in account 108 per RUS Uniform System of Accounts. The account balances are determined by Western’s year end trial balance for the Test Year.

Non-A&G Labor means the Test Year wages associated with all of the Operating Expenses except for the wages in connection with the Administrative and General Expense accounts 920-935 per RUS Uniform System of Accounts.

OTIER shall mean a ratio of Western’s annual earnings before interest to its annual interest expense, calculated in accordance with the formula guidelines utilized in CFC Key Ratio Trend Analysis.

Total Billing Demand means the summation of Western’s wholesale and retail customers’ monthly billing demands for the Test Year (work paper detailing calculation is contained in Western’s work papers accompanying the 34.5kV FBR populated template).

Transmission Labor means the Test Year wages associated with the provision of the Local Access Service and are comprised of 100% of the wages associated with the Transmission Expense in accounts 560-573 per RUS Uniform System of Accounts and, if applicable, any allocated Distribution wages associated with the Distribution O&M Expense accounts 360-373 per RUS Uniform System of Accounts.

RUS Uniform Systems of Accounts is contained in the United States Department of Agriculture Rural Utilities Service Bulletin 1767B-1.

Test Year means the most recent full calendar year prior to the Filing Date.

Southern Pioneer Electric Company
34.5kV FBR Protocols

A. PURPOSE

The 34.5kV FBR is an annual formula-based ratemaking mechanism. Its purpose is to allow for timely adjustments to the corresponding wholesale Local Access Charge ("LAC") and applicable retail rates, without the expense (public and private) and regulatory lag related to preparing and presenting a full rate case every year before the Kansas Corporation Commission ("Commission" or "KCC").

B. PROCESS

No later than May 1 (or the next Business Day when the Commission's offices are open if May 1 is not a Business Day) of each year, in accordance with its Commission-approved 34.5kV FBR, Southern Pioneer Electric Company ("Southern Pioneer") shall submit its 34.5kV FBR "Annual Update" filing for the calendar year just ended ("Test Year") in accordance with the procedures and calculations set forth herein (such date of submittal being the "Filing Date"). The filing will be provided to all parties of record in the Commission Docket approving the initial application for Southern Pioneer's 34.5kV FBR.

Upon filing, the Commission will determine the appropriate term for suspension of the Annual Update pursuant to K.S.A. 66-117. Notwithstanding this suspension, the Commission and Interveners will process the filing as set forth herein, unless ordered otherwise by the Commission. All discovery and confidentiality issues will be governed by Commission Discovery and Protective Orders, which will be issued immediately after the filing of the Annual Update. Upon receipt of the Annual Update filing, the Commission will also immediately issue a Procedural Order in accordance with the following guidelines, which are discussed in more detail in the following timeline:

Day 1	Day after the Filing Date
Day 40-45	A one-day Technical Conference will be set during this time, if necessary.
Day 50-55	A status telephone conference call will be set during this time.
Day 60	Staff and Interveners complete the review of the Annual Update and Staff files a Report and Recommendation or, if necessary, Staff and/or Interveners shall file testimony as outlined hereafter.
Day 75	Southern Pioneer files rebuttal testimony, if necessary.
Day 90	Commission Order either approving the rate adjustments based upon the paper record or notifying the parties that an evidentiary hearing will be held.
Day 95-99	A one-day evidentiary hearing will be set during this time in case it is needed based upon the Commission 90 day Order.
Day 120	Final Order issued if the matter goes to evidentiary hearing.

The Commission Staff, and any other Intervener, will have 60 days from the Filing Date to review the Annual Update to determine if it results in just and reasonable rates that are in the public interest.

If within 60 days from the Filing Date, the Commission Staff and Interveners make a determination that indicates the results of the Annual Update filing are just and reasonable, Commission Staff will file a Report and Recommendation indicating the same. Nothing in this provision is intended to deny Interveners the opportunity to file testimony should there be a relevant objection relating to the Annual Update, rather the purpose of the Report and Recommendation is to relieve Staff and Interveners of the obligation to file formal testimony in the event formal testimony is unnecessary due to the lack of relevant objection to the Annual Update Filing. Provided there are no relevant objections, the Commission shall issue an Order allowing the rates proposed in the Annual Update to become effective no later than 90 days after the Filing Date.

If within 60 days from the Filing Date, Staff and/or Interveners make a determination that indicates the results of the Annual Update filing are unjust or unreasonable, Staff and Interveners shall make a reasonable attempt to resolve any issues surrounding the Annual Update informally with Southern Pioneer. The parties shall utilize the Technical Conference described below in Section F as a forum to try and resolve issues. If unable to resolve issues, Staff and Interveners shall file testimony within 60 days from the Filing Date, setting forth the reason the Annual Update would not result in just and reasonable rates along with supporting documentation, and evidence supporting the position. Issues regarding the Annual Update filing that do not change or impact the rate(s) resulting from the filing shall not be raised in testimony. A party who does not object to the Annual Update filing may file testimony in support of the filing within 60 days from the Filing Date. Questions, concerns or complaints regarding Southern Pioneer or its parent company that are outside the scope of the Annual Update filing, or the rates resulting from the filing, shall not be raised in the Annual Update filing dockets. However, no party is precluded from raising such issues through the normal means available before the Commission.

If within 60 days of the Filing Date, Staff and/or Interveners file testimony regarding Southern Pioneer's Annual Update filing indicating the filing would result in unjust or unreasonable rates that are not in the public interest, then Southern Pioneer shall have the opportunity to file responsive testimony to said objection(s) within 75 days from the Filing Date.

Within 90 days from the Filing Date, the Commission will issue an order either approving the Annual Update filing based upon the paper record, or ordering an evidentiary hearing to be held to address the issues raised by the Annual Update filing. The hearing, if necessary, will proceed as expeditiously as possible, with the explicit goal of a Commission Order within 120 days from the Filing Date. This 120 day order date may be extended by Commission Order if circumstances arise supporting a deviation from the agreed 120-day time period.

The process outlined above does not prohibit interested parties from exercising any other rights they may have to bring a separate complaint or show cause proceeding before the Commission regarding Southern Pioneer, its rates or services.

C. CUSTOMER NOTIFICATION

Customers will receive notice of the filing at the time it is made with the Commission. The notice to wholesale LADS customers may be made via electronic mail or bill insert and for retail customers, the notice shall be made via monthly bill inserts. Both notices shall contain the following information:

1. The date the filing was made with the Commission and the docket number assigned.
2. The amount of the revenue adjustment presented.
3. As applicable, the resulting rate impact on wholesale LADS customers and each individual retail rate class as contained in the filing.
4. A statement explaining that the rate adjustment is being made pursuant to the 34.5kV FBR Plan, with a cite to this docket and the date of the Commission's Order approving the Annual Update in this docket.
5. A Southern Pioneer contact person and phone number for questions.
6. An explicit statement as follows: If you have questions or complaints, please contact the Kansas Corporation Commission, Office of Public Affairs and Consumer Protection at public.affairs@kcc.ks.gov, or call 1(800)662-0027. Questions and/or complaints should reference Docket No. XX:XXX (to include applicable Docket No.).

D. CALCULATION

Each filing shall be based on actual results as presented in the sources listed below and utilizing the RUS Uniform System of Accounts:

- December National Rural Utilities Cooperative Finance Corporation Financial and Statistical Report (CFC Form 7), or an alternative verifiable source containing Southern Pioneer's Operating Income Statement for December.
- December Trial Balance.
- December Payroll Journal.
- December Balance Sheet.

The calculation shall follow the form and format included in Exhibit 1-4 (blank) and Exhibits 2-4 (populated), as endorsed in the Commission Docket approving the initial application for Southern Pioneer's 34.5kV FBR. Specific details concerning the calculation are as follows:

1. Adjustments to actual results for the Test Year will be made as follows:
 - a. *Distribution Operation and Maintenance ("O&M") Expenses* – if distribution plant used to provide Local Access Delivery Service is present that is not already accounted for in a separate rate-making mechanism, the Distribution O&M Expenses will be adjusted consistent with the adjustment to Other Deductions per

Commission policy in accordance with K.S.A. 66-101f(a) as defined below and which may be applicable.

- b. *Administrative and General Expense ("A&G")* will be adjusted consistent with the adjustment to *Other Deductions* per Commission policy in accordance with K.S.A. 66-101f(a) as defined below and which may be applicable.
- c. *Depreciation* will be adjusted to reflect the depreciation expense expected for the calendar year immediately following the Test Year ("Budget Year"). Additionally, the Acquisition Premium ("AP") amortization portion will be removed.
- d. *Other Taxes* may be adjusted, if necessary, to reflect cash only portion paid during the Test Year.
- e. *Interest on Long-Term Debt* will be adjusted to reflect the interest on long-term debt expected for the Budget Year.
- f. *Interest Expense – Other* will be adjusted as necessary to reflect the amount of short-term interest expected for the Budget Year.
- g. *Interest Charged to Construction* will be adjusted as necessary to reflect the amount expected for the Budget Year.
- h. *Other Deductions* – If applicable, Other Deductions expense will be adjusted to reflect the exclusion of the items typically disallowed by the Commission, in whole or in part, per Commission policy in accordance with K.S.A. 66-101f(a) (i.e. dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses) and in a manner consistent with any other separate rate-making mechanism that Southern Pioneer may have in place at the time. As set forth below, Southern Pioneer will include with its filing a complete detailed listing, by account, of all dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses incurred during the Test Year, accompanied by the work paper detailing the calculation of the appropriate exclusion, in whole or in part. Each party may present to the Commission in their recommendation or testimony their position and reasoning in support of inclusion or disallowance of these items. It is expected that disagreement on these issues would not be grounds for requiring the case to go to evidentiary hearing, and that absent other issues supporting the need for the evidentiary hearing, these matters will be resolved by the Commission based upon the paper record.
- i. *Debt Service Payments* for the Test Year shall be adjusted to reflect the interest expense and principal payments for the Budget Year. Interest expense for this purpose shall include both long-term and short-term interest expense. The debt service payments on said debt requirements will be calculated using the expected

amortization schedule(s) at the expected borrowing rate(s). The debt service payments will be determined within the context of Southern Pioneer's budget including the projected plant investments and cash flows needs.

2. The 34.5kV FBR is intended to apply only to the sub-transmission portion of Southern Pioneer's system. In order to accomplish this, the financial results submitted as part of the Annual Update filing should be adjusted to only include the costs associated with such facilities. The following categories of expenses will need to be adjusted to remove the portion not associated with these facilities before the LAC is calculated. The allocation method to be used is listed next to each category. This list is not necessarily exhaustive, and other allocations may be necessary. If additional items are identified, expense or labor items should be allocated using a Labor ratio ("LAB"), and Plant or Debt Service items should be allocated using a Net Plant ratio ("NP").¹ The LAB ratio is calculated as a ratio of Transmission Labor to Total Non-A&G Labor, calculated for the Test Year. The NP ratio is calculated as a ratio of Net Transmission Plant to total Net Plant, calculated for the Test Year, where the Net Transmission Plant includes a General Plant allocation based upon the LAB ratio. These allocators should be calculated and submitted annually with each Annual Update filing.
 - a. A&G Expenses: allocated on LAB ratio.
 - b. Depreciation and Amortization Expense: allocated on NP ratio.
 - c. Tax Expense (if/when applicable): allocated on NP ratio.
 - d. Other Deductions: allocated on NP ratio.
 - e. Interest on Long-Term Debt: allocated on NP ratio.
 - f. Interest-Other: allocated on NP ratio.
 - g. Principal Payments: allocated on NP ratio.
 - h. Offsets to Margin Requirements: allocated on NP ratio.
3. Margin – Southern Pioneer will utilize the same 1.75 MDSC target as approved by the Commission in Southern Pioneer's DSC-FBR Ratemaking Plan in Docket No. 13-MKEE-452-MIS and calculated using a CoBank-specific formula.
4. Determination of the LAC rate:

The Total 34.5kV FBR Revenue Requirement is determined by summing up the applicable operating expenses and margin requirement, as shown in Exhibit 1-4 and Exhibits 2-4 endorsed in the Commission Docket

¹ If any distribution plant that provides Local Access Delivery Service is present as detailed in D.1.a above, Distribution O&M Expenses will be allocated using a Distribution O&M ratio ("DOM"). The DOM ratio is calculated as a ratio of Net Distribution Plant used in provision of Local Access Delivery Service to Total Distribution Plant. As applicable, this allocator should be calculated and submitted with Annual Update filings.

approving the initial application for Southern Pioneer's 34.5kV FBR. To arrive at the \$ per kW LAC rate, the Total Revenue Requirement is divided by the Total Billing Demand for the Test Year. Next, a \$ per kilowatt-hour portion attributable to Southern Pioneer Property Tax Surcharge is subtracted from the unadjusted LAC rate to arrive at the final LAC.

5. Determination of the corresponding total retail rate adjustment:
 - a. Resultant Net LAC will be multiplied by the applicable Retail Billing Demand to determine the total retail rate adjustment.
 - b. Resultant total retail rate adjustment will then be apportioned to each corresponding rate schedules or classes according to Test Year base revenues. For purposes of the 34.5kV FBR, base revenue by rate schedule shall be determined from retail rate schedule revenue by rate class for the Test Year (including ECA revenue/credits), less sum of power supply costs for the Test Year (determined by applying the average cost of power supply per kWh from the most recent Commission-approved class cost of service) and ECA revenue/credits.
 - c. The resultant schedule-specific revenues will be divided by the corresponding Historical Test Year energy sales to determine the per kWh 34.5kV FBR retail rate adjustment.

E. FILING EXHIBITS

In support of the Annual Update filing, Southern Pioneer shall submit the following information:

1. An Annual Update filing containing the rate adjustment requested in compliance with the requirements of the Commission-approved 34.5kV FBR.
2. Southern Pioneer's CFC Form 7 or successor document, containing Comparative Operating Income Statement and Balance Sheet, for the test year.
3. Completed formula as contained in Exhibit 1-4 endorsed in the Commission Docket approving the initial application for Southern Pioneer's 34.5kV FBR. In addition to the PDF version, each Annual Update filing shall be supplemented with a populated formula template in fully functional spreadsheets, with all work papers attached, showing the 34.5kV FBR calculations.
4. Trial Balance for the Test Year.
5. Payroll Journal for the Test Year.
6. Operating Budget for the Test Year.
7. Any other applicable supplemental schedules necessary to audit the filing for the Test Year.

8. A complete detailed accounting, by account, of all dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses incurred during the Test Year.
9. Proposed tariffs sheets including the proposed rate adjustments.

If any of the reports or statements intended to be used as support for Southern Pioneer's upcoming Annual Update filing become available prior to the Filing Date, Southern Pioneer will provide to Staff and Interveners copies of such. All required information will be made accessible on Southern Pioneer's Box.net site or a similar service, with a notification provided to Staff and Interveners alerting them of when the data becomes available.

F. TECHNICAL CONFERENCE AND STATUS CALL

Following the Filing Date, Southern Pioneer will work with Staff and Interveners to schedule a one-day Technical Conference, if necessary, to be held within days 40-45 from the Filing Date. The Technical Conference will be held at the Company's home office. Southern Pioneer will make its staff available to review requested documents and respond to questions. The parties shall submit to Southern Pioneer at least 10 business days before the conference a list of questions and a list of documents that the parties want Southern Pioneer to be prepared to answer and produce, respectively, at the technical conference. If requested, Southern Pioneer will make available to Staff, Interveners and the parties' consultants who are unable to travel to the home office, access to the conference via "GoToMeeting" or a similar internet-based conference program.

Within days 50-55 from the Filing Date, Southern Pioneer will work with Staff and Interveners to schedule a telephone conference call to discuss the status of any outstanding issues with the Annual Update filing. If there are no outstanding issues to discuss, the parties will consider Staff's filing of a Report and Recommendation indicating the results of the Annual Update filing are just and reasonable.

G. MISCELLANEOUS PROVISIONS

1. Nothing in these Protocols limits or deprives Southern Pioneer, Staff of the Commission or any Intervener of any rights it may otherwise have under any applicable provision of applicable law. The provisions of the Protocols addressing review and objection of the Annual Update filings are not intended to, nor shall they be construed as limiting Southern Pioneer's, Staff of the Commission or any Intervener's rights under any applicable provision of applicable law.
2. Signatories who were a party to the original docket requesting the approval of the 34.5kV FBR will be considered automatically approved for intervention upon the filing of an Entry of Appearance in any individual Annual Update filing, provided they are not prohibited from participation by statute or otherwise.

H. DEFINITIONS

Budget Year shall mean the calendar year immediately following the Test Year.

Debt Service Payments means interest and principal payments made during the Test Year adjusted to reflect the interest and principal payments expected for the Budget Year, including both long-term and short-term debt.

Filing Date as defined in Section B of these 34.5kV FBR Protocols.

Form 7 means the December National Rural Utilities Cooperative Finance Corporation Financial and Statistical Report (CFC Form 7) that utilizes the RUS Uniform System of Accounts.

Intervener means a party which has been granted intervention by the Commission in Southern Pioneer's Annual Update filing or as provided in Section G(2).

KCC or Commission means the State Corporation Commission of the State of Kansas.

LAC means the Local Access Charge per kW demand rate for LADS over Southern Pioneer's sub-transmission system as defined in Southern Pioneer's corresponding Local Access Delivery Service tariff on file with the Commission.

Line Losses means real power losses associated with the Local Access Delivery Service. The applicable loss factor is specified within Southern Pioneer's Commission-approved Local Access Delivery Service tariff in effect during the Test Year.

Local Access Delivery Service ("LADS") means wholesale delivery service over Southern Pioneer's sub-transmission system.

MDSC means a Modified Debt Service Coverage ratio of cash flows to annual interest and principal payments on debt, calculated in accordance with the application of Southern Pioneer's loan covenants with CoBank.

Monthly Billing Demand – as defined in Southern Pioneer's Commission-approved Local Access Delivery Service tariff in effect.

Monthly System Peak means the monthly maximum hourly demand on Southern Pioneer's Local Access Delivery System during the Test Year.

Net Plant means total Plant in Service as contained in all electric plant account per RUS Uniform System of Accounts less total Accumulated Reserves for Depreciation in account per RUS Uniform System of Accounts, where the account balances are determined by Southern Pioneer's year end trial balance for the Test Year.

Net Transmission Plant means the total plant in service used by Southern Pioneer for the provision of Local Access Service (including Transmission Plant in Southern Pioneer's accounts 350-359 per RUS Uniform System of Accounts; any Distribution Plant from accounts 360-373 per RUS Uniform System of Accounts that was allocated to the LAC, if applicable; plus any allocated General Plant from accounts 389-399 per RUS Uniform System of Accounts) minus the total amount of corresponding Accumulated Provision for Depreciation in account 108 per RUS Uniform System of Accounts. The account balances are determined by Southern Pioneer's year end trial balance for the Test Year.

Non-A&G Labor means the Test Year wages associated with all of the Operating Expenses *except for* the wages in connection with the Administrative and General Expense accounts 920-935 per RUS Uniform System of Accounts.

Retail Billing Demand means Southern Pioneer's retail load monthly billing demand for the Test Year (work paper detailing calculation is contained in Southern Pioneer's work papers accompanying the 34.5kV FBR populated template).

Total Billing Demand means the summation of Southern Pioneer's wholesale and retail customers' monthly billing demands for the Test Year (work paper detailing calculation is contained in Southern Pioneer's work papers accompanying the 34.5kV FBR populated template).

Transmission Labor means the Test Year wages associated with the provision of the Local Access Service and are comprised of 100% of the wages associated with the Transmission Expense in accounts 560-573 per RUS Uniform System of Accounts and, if applicable, any allocated Distribution wages associated with the Distribution O&M Expense accounts 360-373 per RUS Uniform System of Accounts.

RUS Uniform Systems of Accounts is contained in the United States Department of Agriculture Rural Utilities Service Bulletin 1767B-1.

Test Year means the most recent full calendar year prior to the Filing Date.

CFC KRTA



PRODUCED BY: NRUCFC
20701 Cooperative Way
Dulles, VA 20166
1-800-424-2954

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2013 Key Ratio Trend Analysis (KRTA)

Page 1

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
BASE GROUP (RATIOS 1–5)																
RATIO 1 --- AVERAGE TOTAL CONSUMERS SERVED																
2009		13,220	816	222	6,840	27	3	22,625	67	7	17,675	6	2	18,896	7	2
2010		13,250	815	223	6,869	27	3	22,182	69	6	17,825	6	2	18,841	10	3
2011		13,362	814	225	6,912	27	3	22,202	70	7	17,958	6	2	17,094	11	3
2012		13,571	813	225	6,910	27	3	22,274	69	6	18,104	6	2	5,342	8	1
2013		13,715	815	225	6,960	27	3	22,340	67	2	18,234	6	2	12,314	115	32
RATIO 2 --- TOTAL KWH SOLD (1,000)																
2009		273,002	816	264	115,102	27	5	438,126	67	32	537,798	6	4	443,850	7	4
2010		284,611	815	266	123,159	27	5	460,692	69	32	566,341	6	4	481,422	10	6
2011		287,591	814	262	122,700	27	5	462,727	70	30	581,630	6	4	483,403	11	6
2012		288,425	813	214	119,634	27	5	445,998	69	18	615,956	6	4	218,666	8	1
2013		293,158	815	222	121,287	27	5	450,683	67	18	624,657	6	4	285,372	115	31
RATIO 3 --- TOTAL UTILITY PLANT (1,000)																
2009		63,199.26	817	179	35,027.09	27	3	93,957.00	67	11	113,516.08	6	2	113,706.87	7	3
2010		66,306.87	816	181	36,709.65	27	3	96,125.26	69	12	122,682.94	6	2	109,341.97	10	4
2011		69,163.35	815	178	38,533.36	27	3	101,425.23	70	11	127,468.58	6	2	108,429.20	11	4
2012		71,815.96	813	172	40,768.18	27	3	108,075.02	69	10	129,694.73	6	2	44,420.68	8	1
2013		74,916.36	815	173	43,722.61	27	3	109,520.50	67	10	138,606.68	6	2	80,277.98	115	25
RATIO 4 --- TOTAL NUMBER OF EMPLOYEES (FULL TIME ONLY)																
2009		48	816	184	33	27	3	69	67	16	71	6	2	66	7	2
2010		47	815	186	34	27	3	68	69	13	71	6	2	68	10	3
2011		47	814	199	32	27	4	69	70	16	73	6	3	62	11	3
2012		46	813	197	30	27	4	71	69	15	76	6	3	26	8	1
2013		46	815	186	31	27	3	68	67	13	78	6	2	45	115	23
RATIO 5 --- TOTAL MILES OF LINE																
2009		2,594	816	52	2,136	27	2	3,190	67	1	3,904	6	1	2,377	7	1
2010		2,595	815	52	2,130	27	2	3,204	69	2	3,922	6	1	2,228	10	2
2011		2,602	814	52	2,130	27	2	3,206	70	2	3,944	6	1	2,084	11	2
2012		2,601	813	53	2,133	27	2	3,216	69	2	3,961	6	1	2,014	8	1
2013		2,607	814	53	2,134	27	2	3,241	67	2	3,987	6	1	2,245	115	9
FINANCIAL (RATIOS 6–32)																
RATIO 6 --- TIER																
2009		2.30	817	681	2.47	27	24	2.30	67	54	1.90	6	4	1.64	7	4
2010		2.45	816	580	2.40	27	21	2.71	69	51	2.07	6	4	2.40	10	8
2011		2.40	815	178	3.02	27	9	2.55	70	20	3.29	6	3	2.71	11	2
2012		2.42	813	199	2.89	27	9	2.51	69	19	3.64	6	4	2.39	8	3
2013		2.62	815	246	2.70	27	8	2.80	67	26	3.34	6	3	2.67	115	41

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 2

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 7 ---- TIER (2 OF 3 YEAR HIGH AVERAGE)																
2009	<div></div>	2.48	817	589	2.61	27	20	2.31	67	47	2.26	6	4	2.05	7	4
2010	<div></div>	2.56	816	706	2.71	27	24	2.68	69	57	2.01	6	5	2.34	10	8
2011	<div></div>	2.57	815	342	2.74	27	12	2.70	70	34	2.48	6	3	2.89	11	7
2012	<div></div>	2.62	813	227	3.10	27	11	2.86	69	22	3.28	6	3	2.41	8	3
2013	<div></div>	2.67	815	228	3.22	27	9	2.86	67	23	3.38	6	3	2.76	115	39
RATIO 8 ---- OTIER																
2009	<div></div>	1.71	817	622	1.76	27	20	1.59	67	45	1.20	6	3	1.38	7	4
2010	<div></div>	1.91	816	463	1.91	27	16	1.92	69	41	1.68	6	3	1.88	10	7
2011	<div></div>	1.80	815	406	1.81	27	14	1.82	70	36	1.67	6	3	2.21	11	7
2012	<div></div>	1.77	813	513	1.69	27	17	1.75	69	42	1.52	6	3	1.42	8	4
2013	<div></div>	1.94	815	699	1.92	27	24	1.96	67	59	1.62	6	5	2.05	115	102
RATIO 9 ---- OTIER (2 OF 3 YEAR HIGH AVERAGE)																
2009	<div></div>	1.89	817	801	1.99	27	24	1.77	67	65	1.15	6	4	1.70	7	7
2010	<div></div>	1.95	816	637	1.97	27	20	1.89	69	52	1.54	6	3	1.91	10	8
2011	<div></div>	1.99	815	513	1.98	27	16	1.97	70	45	1.67	6	3	2.22	11	9
2012	<div></div>	1.99	813	504	1.87	27	15	2.04	69	45	1.67	6	3	1.77	8	3
2013	<div></div>	1.98	815	577	2.03	27	19	1.98	67	52	1.61	6	3	2.16	115	86
RATIO 10 ---- MODIFIED DSC (MDSC)																
2009	<div></div>	1.85	817	520	1.70	27	16	1.85	67	41	1.86	6	4	1.87	7	6
2010	<div></div>	1.95	816	249	1.86	27	6	2.09	69	20	2.29	6	3	2.32	10	5
2011	<div></div>	1.81	815	182	1.78	27	3	1.86	70	13	2.09	6	2	2.46	11	6
2012	<div></div>	1.81	813	158	1.76	27	5	1.78	69	9	2.51	6	3	1.76	8	3
2013	<div></div>	1.87	815	173	1.90	27	5	1.87	67	10	2.26	6	3	1.95	115	30
RATIO 11 ---- MDSC (2 OF 3 YEAR HIGH AVERAGE)																
2009	<div></div>	1.95	817	542	2.03	27	17	1.93	67	44	2.09	6	4	2.52	7	6
2010	<div></div>	2.00	816	403	1.95	27	12	2.01	69	35	2.21	6	4	2.21	10	7
2011	<div></div>	2.00	815	244	1.90	27	6	2.04	70	19	2.27	6	3	2.55	11	7
2012	<div></div>	1.98	813	201	1.91	27	4	2.01	69	15	2.36	6	2	2.00	8	3
2013	<div></div>	1.94	815	190	1.91	27	4	1.97	67	13	2.50	6	3	1.99	115	30
RATIO 12 ---- DEBT SERVICE COVERAGE (DSC)																
2009	<div></div>	2.06	817	580	2.09	27	19	2.07	67	49	1.97	6	4	1.98	7	6
2010	<div></div>	2.21	816	303	2.26	27	8	2.48	69	35	2.56	6	4	2.52	10	6
2011	<div></div>	2.11	815	186	2.15	27	5	2.27	70	17	2.50	6	3	2.70	11	5
2012	<div></div>	2.08	813	180	2.13	27	6	2.14	69	17	3.17	6	4	1.97	8	3
2013	<div></div>	2.13	815	202	2.15	27	6	2.35	67	17	2.81	6	4	2.30	115	37

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 3

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 13 --- DSC (2 OF 3 YEAR HIGH AVERAGE)																
2009		2.23	817	601	2.27	27	21	2.19	67	46	2.41	6	5	2.55	7	6
2010		2.26	816	480	2.27	27	19	2.41	69	44	2.39	6	4	2.34	10	7
2011		2.26	815	254	2.35	27	6	2.41	70	26	2.57	6	3	2.65	11	6
2012		2.24	813	211	2.38	27	6	2.42	69	18	2.75	6	3	2.21	8	3
2013		2.23	815	208	2.25	27	7	2.35	67	20	2.91	6	4	2.39	115	39
RATIO 14 --- ODSC																
2009		1.77	817	514	1.64	27	15	1.83	67	39	1.82	6	4	1.74	7	6
2010		1.86	816	237	1.78	27	5	2.03	69	20	2.21	6	2	2.29	10	6
2011		1.76	815	371	1.75	27	12	1.79	70	35	1.77	6	3	2.34	11	7
2012		1.73	813	365	1.68	27	9	1.73	69	31	1.80	6	3	1.69	8	3
2013		1.79	815	569	1.78	27	20	1.82	67	48	1.68	6	5	1.85	115	87
RATIO 15 --- ODSC (2 OF 3 YEAR HIGH AVERAGE)																
2009		1.86	817	669	1.99	27	20	1.87	67	53	1.81	6	4	2.22	7	6
2010		1.90	816	374	1.90	27	11	1.95	69	35	2.04	6	4	2.08	10	8
2011		1.93	815	334	1.85	27	10	1.98	70	31	2.09	6	4	2.47	11	8
2012		1.91	813	326	1.82	27	8	1.96	69	28	2.01	6	3	1.91	8	4
2013		1.87	815	436	1.81	27	13	1.93	67	39	1.84	6	4	1.93	115	68
RATIO 16 --- EQUITY AS A % OF ASSETS																
2009		41.26	817	800	39.53	27	25	42.45	67	65	21.87	6	4	18.80	7	4
2010		41.78	816	789	40.98	27	24	43.08	69	66	21.14	6	3	21.00	10	4
2011		42.32	815	770	43.00	27	24	43.93	70	66	23.80	6	3	24.53	11	5
2012		42.95	813	751	42.31	27	24	45.05	69	62	25.86	6	3	27.05	8	4
2013		43.00	815	738	43.65	27	21	45.87	67	60	26.40	6	3	41.46	115	110
RATIO 17 --- DISTRIBUTION EQUITY (EXCLUDES EQUITY IN ASSOC. ORG'S PATRONAGE CAPITAL)																
2009		35.11	817	777	35.69	27	25	35.23	67	63	21.56	6	4	16.02	7	2
2010		35.87	816	755	35.95	27	22	36.10	69	63	20.80	6	3	18.54	10	4
2011		35.93	815	670	36.14	27	21	35.13	70	58	23.47	6	3	20.21	11	4
2012		35.77	813	610	36.22	27	19	35.47	69	54	25.48	6	3	26.56	8	4
2013		35.94	815	579	37.54	27	19	36.82	67	50	25.27	6	3	34.41	115	77
RATIO 18 --- EQUITY AS A % OF TOTAL CAPITALIZATION																
2009		47.63	817	803	45.23	27	25	48.84	67	65	30.96	6	4	22.29	7	5
2010		48.60	816	794	47.35	27	25	48.29	69	66	28.28	6	4	26.84	10	6
2011		49.12	815	767	47.46	27	24	50.69	70	66	29.81	6	3	31.39	11	6
2012		49.37	813	772	47.44	27	25	50.70	69	64	30.49	6	4	34.48	8	7
2013		49.49	815	752	47.31	27	21	52.83	67	61	30.37	6	3	48.75	115	112

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 4

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 19 --- LONG TERM DEBT AS A % OF TOTAL ASSETS																
2009	<div></div>	45.69	808	14	45.99	27	3	44.60	67	2	61.71	6	3	67.45	7	3
2010	<div></div>	44.72	807	27	46.88	27	3	44.33	69	5	57.65	6	3	63.00	10	5
2011	<div></div>	44.30	805	137	47.27	27	7	43.31	70	12	55.97	6	4	55.73	11	6
2012	<div></div>	44.22	807	27	46.87	27	2	43.77	69	3	58.51	6	2	46.17	8	1
2013	<div></div>	44.29	809	53	47.90	27	6	40.98	67	4	60.21	6	3	45.11	113	7
RATIO 20 --- LONG TERM DEBT PER KWH SOLD (MILLS)																
2009	<div></div>	103.19	808	229	136.31	27	13	95.34	67	16	91.88	6	2	125.21	7	3
2010	<div></div>	103.16	807	281	124.23	27	14	94.72	69	21	105.52	6	2	119.87	10	5
2011	<div></div>	104.60	805	327	133.36	27	17	88.24	70	21	112.18	6	3	118.59	11	6
2012	<div></div>	109.12	807	269	137.28	27	15	94.65	69	20	122.59	6	2	142.00	8	5
2013	<div></div>	112.60	809	247	156.24	27	16	100.00	67	17	134.62	6	3	122.52	113	39
RATIO 21 --- LONG TERM DEBT PER CONSUMER (\$)																
2009	<div></div>	2,043.37	808	247	2,180.30	27	9	1,788.10	67	18	2,582.57	6	4	2,819.02	7	5
2010	<div></div>	2,063.99	807	293	2,235.49	27	11	1,874.96	69	22	2,986.50	6	5	2,786.57	10	6
2011	<div></div>	2,089.05	805	341	2,375.83	27	15	1,902.65	70	24	3,403.38	6	5	3,080.58	11	9
2012	<div></div>	2,142.33	807	197	2,589.68	27	9	1,892.94	69	12	3,553.85	6	5	3,462.67	8	5
2013	<div></div>	2,276.62	809	182	3,015.81	27	11	1,896.43	67	8	4,277.07	6	5	2,514.10	113	33
RATIO 22 --- NON-GOVERNMENT DEBT AS A % OF TOTAL LONG TERM DEBT																
2009	<div></div>	25.26	792	791	14.21	23	23	28.26	65	65	4.55	6	6	86.03	7	7
2010	<div></div>	32.80	794	793	31.19	23	23	34.31	68	68	1.45	5	5	74.83	10	10
2011	<div></div>	32.20	795	795	29.52	23	23	33.09	69	69	6.79	5	5	30.42	11	11
2012	<div></div>	38.85	793	488	68.07	24	19	33.97	67	41	37.05	6	4	51.43	8	6
2013	<div></div>	39.92	800	475	63.21	26	20	31.91	66	37	33.31	6	4	38.02	113	66
RATIO 23 --- BLENDED INTEREST RATE (%)																
2009	<div></div>	5.07	809	763	4.75	27	23	5.21	67	63	4.09	6	4	4.49	7	6
2010	<div></div>	4.96	807	652	4.87	27	19	5.08	69	58	4.33	6	3	5.00	10	6
2011	<div></div>	4.81	805	612	4.55	27	20	4.86	70	54	4.34	6	3	4.52	11	7
2012	<div></div>	4.61	806	664	4.35	27	22	4.67	69	56	4.00	6	4	4.57	8	7
2013	<div></div>	4.47	808	652	4.11	27	19	4.54	67	57	3.58	6	3	4.39	113	94
RATIO 24 --- ANNUAL CAPITAL CREDITS RETIRED PER TOTAL EQUITY (%)																
2009	<div></div>	1.95	631	592	0.68	26	24	1.07	46	44	0.35	6	5	1.63	5	4
2010	<div></div>	1.99	653	626	0.78	27	25	1.46	50	49	0.35	6	6	1.39	8	7
2011	<div></div>	2.18	675	648	1.24	26	26	2.12	56	54	0.32	6	6	1.27	9	8
2012	<div></div>	2.11	672	642	1.63	27	26	2.00	56	55	0.30	6	5	0.71	7	6
2013	<div></div>	2.22	680	655	1.69	27	25	2.00	54	52	0.46	6	5	1.98	92	88

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 5

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 25 ---- LONG-TERM INTEREST AS A % OF REVENUE																
2009	<div></div>	5.14	809	381	5.34	27	15	4.53	67	25	4.84	6	3	5.32	7	4
2010	<div></div>	4.87	807	330	5.36	27	13	4.30	69	24	4.90	6	2	4.61	10	4
2011	<div></div>	4.66	805	355	5.06	27	15	4.19	70	23	4.98	6	3	4.77	11	4
2012	<div></div>	4.58	806	367	4.96	27	17	4.26	69	25	4.86	6	4	5.90	8	6
2013	<div></div>	4.48	808	303	4.93	27	8	4.21	67	21	4.78	6	3	4.51	113	47
RATIO 26 ---- CUMULATIVE PATRONAGE CAPITAL RETIRED AS A % OF TOTAL PATRONAGE CAPITAL																
2009	<div></div>	24.59	696	409	22.44	25	13	17.99	58	20	25.11	6	5	22.44	7	4
2010	<div></div>	24.61	696	450	21.89	24	15	16.38	58	22	25.72	6	5	20.19	10	6
2011	<div></div>	24.67	697	525	21.24	24	18	16.79	60	32	21.70	6	5	20.71	11	7
2012	<div></div>	25.25	697	578	21.68	24	19	17.53	60	37	18.42	6	5	19.60	8	8
2013	<div></div>	25.24	704	604	21.00	25	19	17.82	59	39	16.15	6	5	23.12	96	79
RATIO 27 ---- RATE OF RETURN ON EQUITY (%)																
2009	<div></div>	7.10	817	290	8.21	27	12	6.84	67	20	7.71	6	2	8.51	7	4
2010	<div></div>	7.62	816	45	7.85	27	2	8.69	69	5	10.35	6	2	14.12	10	5
2011	<div></div>	6.93	815	4	8.98	27	2	7.04	70	2	22.20	6	2	14.25	11	1
2012	<div></div>	6.61	813	8	8.92	27	3	6.60	69	2	19.52	6	3	8.00	8	1
2013	<div></div>	7.02	815	11	8.19	27	3	7.13	67	2	17.53	6	3	7.05	115	2
RATIO 28 ---- RATE OF RETURN ON TOTAL CAPITALIZATION (%)																
2009	<div></div>	6.01	817	647	6.25	27	25	5.73	67	50	5.35	6	5	5.37	7	6
2010	<div></div>	6.22	816	287	6.35	27	10	6.91	69	31	6.63	6	3	8.80	10	9
2011	<div></div>	5.91	815	17	7.00	27	2	6.21	70	3	7.84	6	2	7.37	11	2
2012	<div></div>	5.61	813	63	6.70	27	6	5.68	69	8	9.33	6	5	6.95	8	2
2013	<div></div>	5.72	815	59	5.74	27	5	5.84	67	6	8.57	6	4	5.64	115	7
RATIO 29 ---- CURRENT RATIO																
2009	<div></div>	1.20	817	633	0.84	27	16	1.00	67	42	0.70	6	3	0.76	7	4
2010	<div></div>	1.23	816	741	0.90	27	20	1.01	69	64	0.69	6	5	0.66	10	7
2011	<div></div>	1.23	815	803	1.08	27	27	1.12	70	69	0.72	6	6	1.03	11	9
2012	<div></div>	1.25	813	594	1.12	27	22	1.01	69	46	1.09	6	5	0.82	8	4
2013	<div></div>	1.24	815	726	1.22	27	26	1.10	67	55	1.16	6	6	1.17	115	102
RATIO 30 ---- GENERAL FUNDS PER TUP (%)																
2009	<div></div>	3.72	817	580	2.53	27	18	2.47	67	39	4.54	6	6	2.15	7	4
2010	<div></div>	4.16	816	596	2.73	27	18	2.43	69	42	3.82	6	6	2.09	10	6
2011	<div></div>	4.21	815	327	2.99	27	9	3.26	70	22	4.75	6	3	2.52	11	5
2012	<div></div>	4.16	813	191	5.36	27	9	3.46	69	11	9.10	6	4	6.31	8	4
2013	<div></div>	3.98	815	114	3.71	27	7	3.02	67	6	12.18	6	4	3.23	115	14

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 6

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 31 --- PLANT REVENUE RATIO (PRR) ONE YEAR																
2009	<div></div>	6.46	817	49	7.08	27	3	6.54	67	2	7.86	6	2	7.76	7	3
2010	<div></div>	6.31	816	183	6.70	27	10	6.41	69	14	7.26	6	3	6.83	10	5
2011	<div></div>	6.46	815	187	6.76	27	8	6.43	70	16	7.26	6	3	6.63	11	5
2012	<div></div>	6.64	813	101	6.72	27	4	6.82	69	11	7.28	6	2	7.34	8	3
2013	<div></div>	6.59	815	72	6.59	27	1	6.67	67	5	7.32	6	1	6.65	115	12
RATIO 32 --- INVESTMENT IN SUBSIDIARIES TO TOTAL ASSETS (%)																
2009	<div></div>	0.57	239	117	2.08	9	7	0.77	26	16	0.61	3	2	0.61	1	1
2010	<div></div>	0.61	246	138	2.30	10	9	0.69	27	20	1.60	4	4	0.12	3	1
2011	<div></div>	0.58	243	156	1.45	7	6	1.06	28	19	0.64	3	3	0.11	3	1
2012	<div></div>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2013	<div></div>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
REVENUE & MARGINS (RATIOS 33–59)																
RATIO 33 --- TOTAL OPERATING REVENUE PER KWH SOLD (MILLS)																
2009	<div></div>	100.87	816	506	110.45	27	20	97.96	67	40	87.11	6	1	108.74	7	5
2010	<div></div>	102.30	815	350	116.66	27	19	101.88	69	29	95.61	6	1	107.65	10	6
2011	<div></div>	106.02	814	366	129.94	27	21	105.44	70	31	99.18	6	1	109.42	11	7
2012	<div></div>	108.92	813	508	133.83	27	24	105.16	69	41	99.63	6	3	94.29	8	4
2013	<div></div>	110.00	815	440	137.31	27	23	107.39	67	31	104.79	6	3	110.18	115	63
RATIO 34 --- TOTAL OPERATING REVENUE PER TUP INVESTMENT (CENTS)																
2009	<div></div>	42.05	817	631	34.36	27	19	45.42	67	60	44.63	6	6	44.81	7	6
2010	<div></div>	42.52	816	514	37.04	27	12	46.75	69	54	49.00	6	5	44.85	10	8
2011	<div></div>	42.31	815	530	39.21	27	17	45.00	70	59	45.29	6	5	48.05	11	7
2012	<div></div>	41.14	813	492	40.63	27	16	42.11	69	52	44.04	6	5	38.37	8	5
2013	<div></div>	41.80	815	487	39.66	27	17	42.09	67	45	44.66	6	5	41.87	115	65
RATIO 35 --- TOTAL OPERATING REVENUE PER CONSUMER (\$)																
2009	<div></div>	1,981.84	816	585	1,848.04	27	16	1,984.97	67	53	2,584.21	6	6	2,527.60	7	7
2010	<div></div>	2,114.03	815	433	2,066.79	27	14	2,151.50	69	42	2,853.52	6	6	2,888.48	10	10
2011	<div></div>	2,139.09	814	408	2,290.50	27	16	2,151.31	70	37	3,059.84	6	6	2,912.09	11	9
2012	<div></div>	2,148.91	813	329	2,402.41	27	15	2,115.47	69	26	3,033.23	6	6	3,157.69	8	5
2013	<div></div>	2,230.71	815	307	2,389.17	27	12	2,209.16	67	22	3,209.36	6	6	2,398.84	115	54
RATIO 36 --- ELECTRIC REVENUE PER KWH SOLD (MILLS)																
2009	<div></div>	98.81	816	486	109.68	27	19	96.26	67	38	85.09	6	1	90.94	7	3
2010	<div></div>	100.25	815	366	114.48	27	19	98.70	69	30	92.21	6	1	90.26	10	4
2011	<div></div>	104.14	814	373	128.29	27	21	102.23	70	31	94.76	6	2	103.78	11	5
2012	<div></div>	106.99	813	504	132.88	27	22	102.21	69	39	97.52	6	2	93.32	8	4
2013	<div></div>	108.38	815	442	136.80	27	23	104.07	67	30	103.21	6	3	108.38	115	64

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 7

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 37 --- ELECTRIC REVENUE PER CONSUMER (\$)																
2009		1,940.25	816	567	1,749.75	27	15	1,933.06	67	50	2,553.27	6	6	2,174.43	7	7
2010		2,068.08	815	442	1,957.77	27	13	2,065.44	69	42	2,750.35	6	6	2,469.33	10	9
2011		2,105.70	814	415	2,170.03	27	15	2,105.88	70	37	2,921.50	6	6	2,471.06	11	9
2012		2,103.87	813	323	2,255.35	27	14	2,061.15	69	24	2,989.19	6	6	3,137.11	8	5
2013		2,177.29	815	305	2,280.96	27	13	2,150.90	67	21	3,135.55	6	6	2,360.15	115	55
RATIO 38 --- RESIDENTIAL REVENUE PER KWH SOLD (MILLS)																
2009		107.21	816	474	115.93	27	20	104.12	67	37	100.44	6	2	110.76	7	5
2010		109.01	815	327	124.13	27	17	106.85	69	22	108.71	6	1	114.80	10	6
2011		112.13	814	340	136.71	27	21	109.47	70	24	110.56	6	1	115.77	11	6
2012		116.38	813	491	144.39	27	23	113.12	69	37	110.72	6	2	117.82	8	5
2013		117.62	815	427	142.72	27	23	113.52	67	30	115.85	6	3	117.42	115	60
RATIO 39 --- NON-RESIDENTIAL REVENUE PER KWH SOLD (MILLS)																
2009		88.28	815	401	94.24	27	20	88.01	67	31	80.76	6	2	75.16	7	3
2010		89.78	814	296	99.92	27	17	87.88	69	19	87.84	6	2	84.15	10	3
2011		92.63	813	287	114.85	27	20	90.88	70	22	90.14	6	2	94.31	11	4
2012		94.46	812	391	122.80	27	22	92.62	69	29	93.50	6	2	80.52	8	2
2013		96.10	814	332	125.30	27	23	93.25	67	21	99.29	6	3	98.08	115	52
RATIO 40 --- SEASONAL REVENUE PER KWH SOLD (MILLS)																
2009		159.24	304	98	203.86	14	9	141.21	18	4	178.86	4	2	236.50	2	2
2010		164.10	301	77	205.95	14	7	140.86	19	2	188.77	4	2	206.40	3	2
2011		174.24	292	85	207.99	14	7	148.27	19	2	196.22	4	2	202.20	4	2
2012		185.30	286	95	224.18	14	8	149.51	17	2	204.64	4	2	215.12	6	3
2013		182.33	290	87	261.33	15	10	156.46	15	3	202.35	4	2	183.85	40	10
RATIO 41 --- IRRIGATION REVENUE PER KWH SOLD (MILLS)																
2009		117.82	398	235	130.48	18	13	119.00	22	14	101.89	6	2	108.78	5	3
2010		124.98	394	229	126.41	18	12	118.00	24	13	106.86	6	1	114.55	7	3
2011		120.98	399	206	130.59	18	12	119.30	24	12	110.26	6	1	113.00	7	3
2012		115.05	401	222	138.24	18	16	114.74	23	13	111.91	6	4	120.85	6	4
2013		126.67	403	245	160.55	18	16	134.96	24	17	121.82	6	4	128.93	53	33
RATIO 42 --- SMALL COMMERCIAL REVENUE PER KWH SOLD (MILLS)																
2009		99.12	813	318	107.26	27	15	96.70	67	25	94.69	6	2	104.14	7	4
2010		100.47	813	238	112.66	27	17	96.90	69	19	102.61	6	2	104.79	10	4
2011		103.13	813	247	122.70	27	20	101.95	70	20	104.50	6	2	102.26	11	3
2012		106.08	812	303	129.35	27	23	103.40	69	20	107.97	6	3	106.66	8	3
2013		107.71	811	245	128.78	26	21	105.29	67	18	106.32	5	1	107.14	115	33

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 8

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 43 --- LARGE COMMERCIAL REVENUE PER KWH SOLD (MILLS)																
2009	<div></div>	72.21	685	456	76.84	18	12	74.31	60	43	64.03	5	3	62.08	6	3
2010	<div></div>	72.94	683	246	79.75	19	12	72.64	62	21	79.09	5	3	77.00	8	3
2011	<div></div>	75.63	686	229	84.92	19	11	76.10	63	18	82.22	5	2	82.93	9	5
2012	<div></div>	76.64	691	427	91.83	19	16	78.44	64	41	74.22	5	4	65.65	8	1
2013	<div></div>	77.93	695	327	91.61	19	11	79.16	61	31	79.16	5	3	78.07	91	42
RATIO 44 --- SALES FOR RESALE REVENUE PER KWH SOLD (MILLS)																
2009	<div></div>	61.86	121	99	52.96	8	5	52.78	9	6	57.47	4	4	51.37	1	1
2010	<div></div>	64.14	119	98	58.16	8	6	56.41	9	7	61.49	4	4	52.43	1	1
2011	<div></div>	67.23	121	105	58.50	8	7	58.80	9	6	63.04	4	4	54.42	1	1
2012	<div></div>	71.68	121	70	69.97	8	5	62.24	10	2	72.73	4	4	69.60	3	2
2013	<div></div>	74.66	117	58	75.53	8	6	66.62	9	2	78.85	4	4	69.03	18	4
RATIO 45 --- STREET & HIGHWAY LIGHTING REVENUE PER KWH SOLD (MILLS)																
2009	<div></div>	139.11	588	263	149.57	22	12	137.19	50	22	158.85	6	5	153.71	6	4
2010	<div></div>	142.73	587	267	148.42	22	10	142.65	51	22	157.68	6	4	161.47	8	5
2011	<div></div>	144.87	591	261	157.31	22	12	149.13	52	24	160.99	6	4	176.22	9	7
2012	<div></div>	150.06	592	304	156.94	22	13	150.35	51	27	154.79	6	4	139.23	6	2
2013	<div></div>	153.73	596	299	157.44	22	12	153.47	49	25	159.54	6	4	153.47	83	42
RATIO 46 --- OTHER SALES TO PUBLIC AUTHORITIES REVENUE PER KWH SOLD (MILLS)																
2009	<div></div>	106.19	293	206	124.07	15	15	106.83	25	21	98.61	4	4	112.71	5	4
2010	<div></div>	109.31	296	195	128.99	15	15	110.91	25	19	112.17	4	4	121.08	5	5
2011	<div></div>	109.20	291	188	139.50	15	15	113.11	24	18	115.97	4	4	121.15	5	4
2012	<div></div>	111.94	289	220	150.02	15	15	114.10	24	22	119.19	4	4	95.48	3	2
2013	<div></div>	114.63	292	204	150.22	15	15	119.30	21	17	127.43	4	4	117.99	46	33
RATIO 47 --- OPERATING MARGINS PER KWH SOLD (MILLS)																
2009	<div></div>	3.27	816	565	5.09	27	20	2.42	67	41	0.90	6	3	1.83	7	4
2010	<div></div>	3.92	815	363	5.16	27	16	3.92	69	30	2.84	6	2	4.34	10	5
2011	<div></div>	3.47	814	320	4.37	27	14	3.67	70	24	3.08	6	2	5.20	11	8
2012	<div></div>	3.43	813	470	3.87	27	18	2.71	69	34	2.58	6	3	2.30	8	4
2013	<div></div>	4.15	815	661	5.06	27	26	3.62	67	51	2.68	6	5	4.58	115	96
RATIO 48 --- OPERATING MARGINS PER CONSUMER (\$)																
2009	<div></div>	64.69	816	604	77.36	27	19	52.11	67	45	16.18	6	3	33.39	7	4
2010	<div></div>	81.23	815	393	91.26	27	17	84.77	69	35	85.58	6	4	116.27	10	9
2011	<div></div>	70.64	814	332	83.93	27	13	72.44	70	26	85.10	6	3	132.85	11	8
2012	<div></div>	65.07	813	423	74.68	27	16	53.85	69	30	75.71	6	5	87.95	8	5
2013	<div></div>	82.19	815	652	89.67	27	23	65.74	67	51	88.80	6	5	88.10	115	101

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 9

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 49 --- NON-OPERATING MARGINS PER KWH SOLD (MILLS)																
2009	<div></div>	0.49	816	271	0.72	27	10	0.41	67	19	0.77	6	3	0.74	7	3
2010	<div></div>	0.50	815	198	0.64	27	8	0.40	69	12	1.21	6	4	0.52	10	3
2011	<div></div>	0.52	814	30	0.79	27	2	0.51	70	3	2.74	6	2	0.57	11	1
2012	<div></div>	0.52	813	97	0.47	27	4	0.53	69	8	1.17	6	2	0.84	8	1
2013	<div></div>	0.51	815	112	0.77	27	6	0.55	67	9	1.51	6	3	0.39	115	16
RATIO 50 --- NON-OPERATING MARGINS PER CONSUMER (\$)																
2009	<div></div>	10.41	816	296	11.87	27	8	8.91	67	19	23.58	6	4	18.16	7	5
2010	<div></div>	10.27	815	220	10.81	27	8	8.69	69	15	32.77	6	4	14.30	10	4
2011	<div></div>	11.07	814	46	11.54	27	4	10.05	70	2	76.23	6	4	18.55	11	2
2012	<div></div>	10.77	813	84	6.76	27	3	9.09	69	8	28.69	6	3	29.51	8	4
2013	<div></div>	11.64	815	99	13.25	27	4	11.18	67	9	36.34	6	3	9.44	115	13
RATIO 51 --- TOTAL MARGINS LESS ALLOCATIONS PER KWH SOLD (MILLS)																
2009	<div></div>	4.08	816	554	4.85	27	21	3.10	67	41	3.50	6	4	3.54	7	5
2010	<div></div>	4.63	815	340	5.95	27	15	4.26	69	27	4.27	6	2	5.25	10	5
2011	<div></div>	4.37	814	150	5.43	27	10	4.19	70	14	5.05	6	1	6.88	11	4
2012	<div></div>	4.03	813	345	4.68	27	14	3.53	69	26	4.36	6	3	3.87	8	4
2013	<div></div>	4.98	815	550	5.92	27	22	4.24	67	42	4.24	6	4	5.39	115	87
RATIO 52 --- TOTAL MARGINS LESS ALLOCATIONS PER CONSUMER (\$)																
2009	<div></div>	80.44	816	590	87.82	27	19	63.63	67	45	72.86	6	4	80.08	7	5
2010	<div></div>	99.63	815	362	120.39	27	15	100.59	69	32	118.34	6	4	138.53	10	8
2011	<div></div>	90.25	814	166	108.38	27	9	89.45	70	13	156.79	6	4	169.80	11	8
2012	<div></div>	83.37	813	318	112.60	27	15	63.81	69	26	133.23	6	5	123.42	8	6
2013	<div></div>	100.52	815	518	109.56	27	19	87.17	67	40	115.90	6	4	112.62	115	81
RATIO 53 --- INCOME (LOSS) FROM EQUITY INVESTMENTS PER CONSUMER (\$)																
2009	<div></div>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2010	<div></div>	1.76	244	124	3.62	8	5	2.35	26	16	1.61	3	2	1.61	3	2
2011	<div></div>	1.46	241	130	9.78	7	6	3.12	23	17	75.09	3	3	5.03	2	2
2012	<div></div>	0.69	239	136	0.21	7	4	4.80	24	16	0.21	3	2	4.65	5	4
2013	<div></div>	1.91	236	151	−3.90	6	3	4.18	24	20	0.17	3	2	2.73	32	22
RATIO 54 --- ASSOCIATED ORGANIZATION'S CAPITAL CREDITS PER KWH SOLD (MILLS)																
2009	<div></div>	2.34	767	625	5.16	27	22	2.75	63	56	0.61	6	4	0.94	7	6
2010	<div></div>	2.54	767	672	4.35	27	25	3.35	65	60	0.71	6	5	1.24	9	8
2011	<div></div>	2.75	769	38	5.98	27	11	3.65	66	2	3.88	6	3	1.34	10	2
2012	<div></div>	2.98	772	31	6.65	27	8	3.64	65	3	8.76	6	4	3.80	8	1
2013	<div></div>	3.16	769	10	2.15	27	4	3.36	63	1	12.11	6	4	3.17	108	4

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 10

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 55 ---- ASSOCIATED ORGANIZATION'S CAPITAL CREDITS PER CONSUMER (\$)																
2009	<div></div>	43.39	767	634	68.62	27	22	52.08	63	58	16.50	6	4	22.94	7	6
2010	<div></div>	51.24	767	682	66.00	27	25	67.25	65	62	18.95	6	6	35.23	9	8
2011	<div></div>	54.92	769	88	89.38	27	7	67.03	66	7	85.02	6	3	32.18	10	3
2012	<div></div>	58.79	772	57	101.41	27	6	67.51	65	6	222.36	6	5	116.66	8	4
2013	<div></div>	60.51	769	33	40.82	27	5	67.35	63	2	296.52	6	5	60.25	108	6
RATIO 56 ---- TOTAL MARGINS PER KWH SOLD (MILLS)																
2009	<div></div>	6.68	816	692	8.61	27	25	5.78	67	56	3.80	6	4	4.56	7	5
2010	<div></div>	7.20	815	524	9.00	27	22	7.41	69	50	5.21	6	2	7.32	10	7
2011	<div></div>	7.12	814	65	11.32	27	8	7.43	70	5	9.55	6	2	9.65	11	4
2012	<div></div>	7.05	813	134	11.67	27	13	6.63	69	16	13.20	6	5	7.34	8	3
2013	<div></div>	7.96	815	117	10.12	27	9	7.56	67	6	12.83	6	3	8.22	115	18
RATIO 57 ---- TOTAL MARGINS PER CONSUMER (\$)																
2009	<div></div>	130.60	816	697	147.56	27	25	113.72	67	58	81.47	6	4	103.02	7	5
2010	<div></div>	150.51	815	562	164.27	27	21	162.77	69	51	138.99	6	4	207.25	10	10
2011	<div></div>	144.88	814	104	198.33	27	9	151.52	70	7	241.80	6	3	204.09	11	5
2012	<div></div>	145.56	813	151	209.41	27	9	134.34	69	11	375.95	6	5	245.90	8	4
2013	<div></div>	164.59	815	134	205.08	27	7	163.04	67	7	339.96	6	4	179.62	115	17
RATIO 58 ---- A/R OVER 60 DAYS AS A % OF OPERATING REVENUE																
2009	<div></div>	0.17	806	204	0.12	26	5	0.20	66	19	0.13	6	1	0.38	7	4
2010	<div></div>	0.17	802	104	0.16	26	1	0.19	68	11	0.21	6	1	0.62	9	4
2011	<div></div>	0.15	799	107	0.12	26	2	0.17	68	10	0.13	6	1	0.45	10	4
2012	<div></div>	0.13	795	207	0.07	25	4	0.17	68	20	0.08	6	1	0.15	8	2
2013	<div></div>	0.13	805	203	0.06	25	7	0.13	67	15	0.16	6	2	0.14	112	24
RATIO 59 ---- AMOUNT WRITTEN OFF AS A % OF OPERATING REVENUE																
2009	<div></div>	0.20	784	452	0.12	24	8	0.24	65	47	0.11	6	2	0.20	6	4
2010	<div></div>	0.18	779	424	0.13	26	10	0.25	67	47	0.14	6	3	0.16	8	5
2011	<div></div>	0.17	780	479	0.09	26	8	0.23	68	54	0.11	6	3	0.16	9	6
2012	<div></div>	0.15	777	304	0.07	25	6	0.20	68	36	0.16	6	3	0.07	7	1
2013	<div></div>	0.14	783	440	0.09	24	9	0.17	67	46	0.09	6	2	0.12	110	56
SALES (RATIOS 60–76)																
RATIO 60 ---- TOTAL MWH SOLD PER MILE OF LINE																
2009	<div></div>	110.39	816	652	53.45	27	10	130.86	67	67	143.44	6	5	219.38	7	7
2010	<div></div>	114.36	815	636	57.66	27	10	138.88	69	69	149.34	6	5	220.36	10	9
2011	<div></div>	116.06	814	638	57.01	27	10	138.79	70	70	159.69	6	5	247.54	11	10
2012	<div></div>	112.66	813	590	54.77	27	9	134.00	69	66	162.24	6	5	72.90	8	4
2013	<div></div>	117.33	814	597	57.65	27	10	136.16	67	64	158.64	6	5	116.06	115	83

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 11

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 61 --- AVERAGE RESIDENTIAL USAGE KWH PER MONTH																
2009	<div></div>	1,173.32	816	749	967.61	27	26	1,177.30	67	65	812.27	6	6	815.89	7	5
2010	<div></div>	1,239.39	815	733	1,043.30	27	24	1,255.47	69	67	881.54	6	5	892.77	10	8
2011	<div></div>	1,213.00	814	735	1,049.42	27	24	1,216.32	70	68	901.70	6	5	916.84	11	9
2012	<div></div>	1,140.51	813	723	971.11	27	24	1,155.73	69	67	882.24	6	5	992.34	8	8
2013	<div></div>	1,174.69	815	738	996.22	27	24	1,192.48	67	65	871.45	6	5	1,236.01	115	108
RATIO 62 --- AVERAGE SEASONAL KWH USAGE PER MONTH																
2009	<div></div>	278.87	304	249	151.65	14	7	280.52	18	17	142.46	4	2	108.40	2	1
2010	<div></div>	278.83	301	249	160.65	14	9	331.31	19	18	149.32	4	2	158.91	3	2
2011	<div></div>	277.40	292	244	157.20	14	10	301.39	19	18	147.13	4	2	182.31	4	3
2012	<div></div>	282.59	285	238	159.11	14	8	310.04	17	16	145.67	4	1	208.59	6	5
2013	<div></div>	302.22	290	246	162.88	15	8	351.79	15	14	160.12	4	2	314.01	40	36
RATIO 63 --- AVERAGE IRRIGATION KWH USAGE PER MONTH																
2009	<div></div>	1,951.34	397	250	1,278.80	18	8	1,651.56	22	13	1,876.78	6	5	1,684.78	5	4
2010	<div></div>	1,678.12	394	175	1,786.94	18	9	1,557.18	24	9	1,965.74	6	5	1,865.55	7	4
2011	<div></div>	1,943.18	399	194	2,021.99	18	9	2,033.37	24	13	2,624.99	6	5	2,032.87	7	4
2012	<div></div>	2,882.32	400	189	2,254.45	18	7	2,411.19	23	8	2,972.88	6	3	3,077.67	6	4
2013	<div></div>	2,245.13	403	150	1,926.24	18	3	2,174.91	24	9	2,481.38	6	3	2,300.88	53	19
RATIO 64 --- AVERAGE SMALL COMMERCIAL KWH USAGE PER MONTH																
2009	<div></div>	3,228.63	813	493	2,106.24	27	8	3,519.68	67	46	2,412.19	6	3	3,298.02	7	5
2010	<div></div>	3,283.98	813	471	2,214.67	27	8	3,432.58	69	45	2,516.62	6	3	3,131.13	10	6
2011	<div></div>	3,323.04	813	488	2,225.80	27	9	3,421.21	70	45	2,544.60	6	3	3,098.78	11	8
2012	<div></div>	3,293.62	812	478	2,222.98	27	8	3,500.26	69	44	2,586.42	6	3	3,150.78	8	5
2013	<div></div>	3,407.48	811	484	2,547.00	26	9	3,446.24	67	42	2,958.11	5	3	3,421.99	115	66
RATIO 65 --- AVERAGE LARGE COMMERCIAL KWH USAGE PER MONTH																
2009	<div></div>	469,224.36	685	181	314,343.75	18	3	522,875.60	60	16	632,982.46	5	2	761,624.04	6	2
2010	<div></div>	464,600.00	683	218	300,541.67	19	4	504,429.17	62	19	732,972.22	5	2	523,015.28	8	3
2011	<div></div>	464,921.88	686	207	307,083.33	19	4	563,900.00	63	21	693,578.57	5	2	468,713.64	9	3
2012	<div></div>	469,450.00	691	204	293,630.95	19	4	553,975.00	64	21	635,697.37	5	2	634,322.92	8	2
2013	<div></div>	453,642.86	695	237	309,125.00	19	6	493,450.00	61	21	589,461.38	5	2	474,828.13	91	32
RATIO 66 --- AVERAGE STREET & HIGHWAY LIGHTING KWH USAGE PER MONTH																
2009	<div></div>	1,416.67	585	309	1,347.37	21	11	1,351.71	50	26	1,711.31	6	5	3,150.49	6	6
2010	<div></div>	1,405.75	584	301	1,174.48	21	10	1,564.81	51	28	1,565.78	6	4	1,830.13	8	7
2011	<div></div>	1,402.38	587	301	1,215.05	21	10	1,506.74	52	30	1,597.64	6	4	2,666.67	9	8
2012	<div></div>	1,394.84	586	329	1,174.73	21	12	1,366.96	51	29	1,550.86	6	5	695.76	6	3
2013	<div></div>	1,388.89	589	406	1,073.72	21	13	1,529.28	49	33	1,587.01	6	6	1,047.71	83	50

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 12

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 67 --- AVERAGE SALES FOR RESALE KWH USAGE PER MONTH																
2009		331,583.33	120	23	1,282,111.11	8	5	959,678.57	8	3	1,323,708.33	4	3	1,270,833.33	1	1
2010		371,883.33	117	27	1,411,902.78	8	5	1,184,039.68	8	4	1,411,902.78	4	3	1,342,305.56	1	1
2011		376,895.83	116	28	1,397,388.89	8	5	1,172,174.60	8	4	1,414,861.11	4	3	1,335,194.44	1	1
2012		350,611.11	117	26	1,412,590.28	8	5	978,880.95	9	4	1,426,659.72	4	3	143,361.11	3	1
2013		340,708.33	115	19	1,158,656.25	8	2	935,630.95	8	3	1,614,729.17	4	2	734,875.00	18	4
RATIO 68 --- AVERAGE SALES TO PUBLIC AUTHORITIES KWH USAGE PER MONTH																
2009		2,040.30	291	193	1,314.94	15	7	2,018.83	25	18	1,634.12	4	3	1,939.39	5	4
2010		2,133.75	293	190	1,402.91	15	8	2,142.47	25	18	1,682.52	4	3	1,402.91	5	3
2011		2,096.61	288	200	1,361.42	15	9	2,059.64	24	18	1,871.62	4	3	2,416.67	5	4
2012		2,056.34	287	193	1,397.12	15	8	1,772.62	24	16	1,800.83	4	3	1,392.86	3	1
2013		2,154.51	290	207	1,258.85	15	7	1,881.83	21	16	1,648.22	4	3	2,065.83	45	33
RATIO 69 --- RESIDENTIAL KWH SOLD PER TOTAL KWH SOLD (%)																
2009		61.33	816	719	58.62	27	19	65.85	67	63	19.56	6	1	29.86	7	4
2010		61.83	815	721	58.49	27	19	65.93	69	66	20.06	6	1	31.22	10	6
2011		61.25	814	718	60.29	27	19	65.05	70	67	19.65	6	1	32.12	11	7
2012		59.02	813	722	57.99	27	19	63.79	69	67	19.01	6	1	22.03	8	3
2013		59.93	815	729	56.84	27	19	64.64	67	65	19.34	6	1	60.99	115	104
RATIO 70 --- SEASONAL KWH SOLD PER TOTAL KWH SOLD (%)																
2009		1.40	304	150	0.82	14	5	1.24	18	6	1.10	4	2	0.76	2	1
2010		1.42	301	153	0.84	14	4	1.18	19	8	0.99	4	1	0.44	3	1
2011		1.39	292	152	0.86	14	4	1.32	19	10	0.95	4	1	0.22	4	1
2012		1.41	286	154	0.87	14	5	1.27	17	10	0.91	4	1	0.65	6	2
2013		1.37	290	159	1.02	15	5	1.26	15	9	1.17	4	2	1.59	40	23
RATIO 71 --- IRRIGATION KWH SOLD PER TOTAL KWH SOLD (%)																
2009		1.18	398	141	3.13	18	8	0.94	22	6	4.95	6	5	1.09	5	2
2010		1.06	394	129	3.33	18	9	0.80	24	7	5.31	6	5	1.02	7	3
2011		1.40	399	132	3.65	18	9	0.95	24	7	6.61	6	5	0.36	7	3
2012		2.04	401	139	5.44	18	8	1.30	23	7	7.05	6	4	11.79	6	4
2013		1.56	403	126	4.13	18	6	0.92	24	8	5.79	6	4	2.91	53	20
RATIO 72 --- SMALL COMMERCIAL KWH SOLD PER TOTAL KWH SOLD (%)																
2009		17.44	813	45	29.35	27	5	17.44	67	1	32.98	6	2	28.63	7	2
2010		17.32	813	39	29.18	27	5	16.96	69	1	32.45	6	2	23.66	10	3
2011		17.49	813	39	28.98	27	5	16.98	70	1	31.82	6	2	25.20	11	3
2012		17.65	812	65	30.29	27	8	17.40	69	3	32.89	6	2	22.91	8	3
2013		17.59	811	70	31.08	26	9	17.40	67	4	34.37	5	2	17.00	115	10

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 13

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 73 --- LARGE COMMERCIAL KWH SOLD PER TOTAL KWH SOLD (%)																
2009	<div></div>	13.65	685	342	13.70	18	9	13.62	60	30	32.29	5	5	43.23	6	6
2010	<div></div>	13.96	683	359	14.66	19	12	13.08	62	32	33.14	5	5	40.35	8	8
2011	<div></div>	14.14	686	361	14.09	19	12	13.70	63	33	32.80	5	5	38.66	9	8
2012	<div></div>	14.43	691	382	14.06	19	13	12.37	64	33	31.56	5	5	11.92	8	4
2013	<div></div>	14.13	695	431	17.24	19	13	13.55	61	39	35.98	5	5	13.86	91	57
RATIO 74 --- STREET & HIGHWAY LIGHTING KWH SOLD PER TOTAL KWH SOLD (%)																
2009	<div></div>	0.13	589	42	0.15	22	2	0.10	50	5	0.27	6	1	0.33	6	1
2010	<div></div>	0.13	588	46	0.15	22	2	0.11	51	6	0.33	6	1	0.30	8	1
2011	<div></div>	0.12	592	43	0.15	22	2	0.11	52	5	0.31	6	1	0.29	9	1
2012	<div></div>	0.13	593	56	0.15	22	4	0.13	51	7	0.30	6	2	0.03	6	1
2013	<div></div>	0.12	597	66	0.16	22	5	0.13	49	8	0.30	6	2	0.09	83	7
RATIO 75 --- SALES FOR RESALE PER TOTAL KWH SOLD (%)																
2009	<div></div>	2.53	121	21	9.73	8	3	4.03	9	3	9.50	4	2	10.31	1	1
2010	<div></div>	3.33	119	24	9.10	8	3	5.69	9	4	9.26	4	2	10.13	1	1
2011	<div></div>	2.78	121	25	8.80	8	3	6.49	9	4	8.94	4	2	9.94	1	1
2012	<div></div>	2.41	121	13	8.77	8	2	5.44	10	2	12.85	4	2	1.70	3	1
2013	<div></div>	2.51	118	10	7.99	8	2	3.92	9	1	14.16	4	2	3.73	18	3
RATIO 76 --- SALES TO PUBLIC AUTHORITIES PER TOTAL KWH SOLD (%)																
2009	<div></div>	0.99	293	170	0.73	15	8	1.04	25	15	0.48	4	1	0.54	5	2
2010	<div></div>	0.99	296	174	0.75	15	9	1.03	25	16	0.49	4	1	0.33	5	2
2011	<div></div>	0.97	291	175	0.76	15	9	1.06	24	16	0.49	4	1	0.73	5	3
2012	<div></div>	0.97	289	176	0.69	15	8	1.09	24	15	0.47	4	1	0.38	3	1
2013	<div></div>	1.05	292	182	0.65	15	8	1.06	21	13	0.46	4	1	1.05	46	31
CONTROLLABLE EXPENSES (RATIOS 77–87)																
RATIO 77 --- O & M EXPENSES PER TOTAL KWH SOLD (MILLS)																
2009	<div></div>	10.36	816	433	12.76	27	20	9.73	67	28	7.60	6	1	9.10	7	2
2010	<div></div>	10.49	815	414	13.41	27	19	9.88	69	28	7.80	6	1	7.57	10	3
2011	<div></div>	10.82	814	358	15.94	27	18	10.15	70	22	8.23	6	1	8.88	11	4
2012	<div></div>	11.43	813	515	15.80	27	22	10.75	69	42	7.96	6	3	10.09	8	5
2013	<div></div>	11.38	815	479	17.14	27	20	10.75	67	36	7.97	6	1	11.30	115	65
RATIO 78 --- O & M EXPENSES PER DOLLARS OF TUP (MILLS)																
2009	<div></div>	43.26	817	608	43.55	27	20	43.33	67	57	34.84	6	3	35.08	7	3
2010	<div></div>	44.28	816	571	45.72	27	21	43.34	69	53	35.83	6	2	35.89	10	3
2011	<div></div>	44.34	815	513	44.67	27	19	44.16	70	49	36.81	6	2	33.29	11	3
2012	<div></div>	43.55	813	589	44.24	27	21	44.40	69	56	35.40	6	3	38.83	8	6
2013	<div></div>	42.94	815	558	46.20	27	22	44.55	67	51	35.13	6	3	40.69	115	72

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 14

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 79 --- O & M EXPENSES PER CONSUMER (\$)																
2009	<div></div>	207.68	816	535	221.92	27	22	198.68	67	39	211.05	6	5	206.71	7	5
2010	<div></div>	217.81	815	483	236.12	27	21	201.77	69	33	222.23	6	5	213.21	10	6
2011	<div></div>	229.61	814	422	266.16	27	21	209.77	70	24	240.88	6	4	223.25	11	5
2012	<div></div>	232.70	813	462	263.42	27	19	218.35	69	33	230.67	6	4	335.68	8	8
2013	<div></div>	242.30	815	432	279.02	27	22	223.24	67	32	235.15	6	4	238.20	115	60
RATIO 80 --- CONSUMER ACCOUNTING EXPENSES PER TOTAL KWH SOLD (MILLS)																
2009	<div></div>	2.86	816	520	3.08	27	19	2.69	67	46	1.92	6	2	2.49	7	5
2010	<div></div>	2.84	815	244	3.25	27	9	2.85	69	19	2.12	6	1	2.57	10	3
2011	<div></div>	2.90	814	330	3.24	27	14	2.95	70	27	2.11	6	2	2.90	11	4
2012	<div></div>	2.91	813	444	3.28	27	18	3.09	69	42	2.14	6	2	2.37	8	3
2013	<div></div>	2.84	815	597	3.19	27	21	2.86	67	51	1.88	6	3	2.82	115	82
RATIO 81 --- CONSUMER ACCOUNTING EXPENSES PER CONSUMER (\$)																
2009	<div></div>	57.61	816	622	54.78	27	17	58.51	67	51	51.02	6	5	62.32	7	7
2010	<div></div>	58.47	815	248	58.26	27	6	57.87	69	21	66.39	6	3	68.65	10	5
2011	<div></div>	59.35	814	333	58.71	27	9	61.11	70	32	66.04	6	4	68.14	11	9
2012	<div></div>	58.40	813	343	61.79	27	13	61.86	69	35	65.34	6	4	58.81	8	4
2013	<div></div>	59.17	815	633	55.00	27	19	59.15	67	54	57.03	6	5	59.18	115	92
RATIO 82 --- CUSTOMER SALES AND SERVICE PER TOTAL KWH SOLD (MILLS)																
2009	<div></div>	0.88	804	250	0.89	25	4	0.91	67	16	0.67	6	1	0.78	7	2
2010	<div></div>	0.88	801	265	0.89	25	6	0.79	67	13	0.62	6	1	0.64	9	3
2011	<div></div>	0.89	803	274	0.81	25	6	0.80	69	15	0.67	6	1	0.70	10	3
2012	<div></div>	0.91	800	304	0.84	25	8	0.90	68	22	0.72	6	1	0.90	8	3
2013	<div></div>	0.91	802	279	0.95	25	7	0.90	66	23	0.83	6	1	0.99	114	43
RATIO 83 --- CUSTOMER SALES AND SERVICE PER CONSUMER (\$)																
2009	<div></div>	17.32	804	278	15.68	25	4	17.19	67	16	21.52	6	2	24.82	7	4
2010	<div></div>	18.30	801	282	17.24	25	3	17.30	67	15	22.09	6	1	21.94	9	4
2011	<div></div>	18.34	803	300	17.28	25	6	17.70	69	19	25.20	6	3	22.30	10	3
2012	<div></div>	18.58	800	278	18.30	25	6	17.88	68	18	26.23	6	3	42.69	8	5
2013	<div></div>	19.59	802	262	21.22	25	6	19.75	66	16	27.44	6	3	22.27	114	48
RATIO 84 --- A & G EXPENSES PER TOTAL KWH SOLD (MILLS)																
2009	<div></div>	5.83	816	576	7.10	27	24	4.67	67	36	4.21	6	3	4.36	7	4
2010	<div></div>	5.78	815	544	7.44	27	24	4.66	69	39	4.36	6	3	4.27	10	5
2011	<div></div>	5.98	814	519	7.90	27	24	4.80	70	32	4.94	6	3	4.95	11	6
2012	<div></div>	6.20	813	583	7.85	27	24	5.19	69	46	4.42	6	3	5.78	8	6
2013	<div></div>	6.22	815	546	8.55	27	24	5.04	67	35	5.13	6	4	6.55	115	79

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 15

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 85 --- A & G EXPENSES PER CONSUMER (\$)																
2009	<div></div>	115.92	816	632	117.15	27	26	88.02	67	42	132.60	6	6	113.37	7	6
2010	<div></div>	121.82	815	591	121.76	27	24	93.23	69	39	141.02	6	6	121.14	10	8
2011	<div></div>	124.90	814	562	136.92	27	23	97.02	70	35	150.74	6	6	134.46	11	9
2012	<div></div>	127.96	813	569	138.10	27	24	97.81	69	33	151.78	6	6	187.78	8	7
2013	<div></div>	131.56	815	514	145.82	27	23	101.94	67	26	164.22	6	6	138.56	115	76
RATIO 86 --- TOTAL CONTROLLABLE EXPENSES PER TOTAL KWH SOLD (MILLS) (SAME AS RATIO #103)																
2009	<div></div>	20.27	816	506	23.54	27	21	18.90	67	36	13.87	6	2	14.92	7	3
2010	<div></div>	20.31	815	430	23.65	27	20	19.00	69	27	15.39	6	2	17.09	10	4
2011	<div></div>	21.11	814	412	26.43	27	20	18.98	70	25	16.58	6	2	19.63	11	4
2012	<div></div>	21.98	813	553	28.18	27	21	20.09	69	42	16.43	6	2	19.13	8	5
2013	<div></div>	21.76	815	547	31.33	27	24	20.20	67	41	18.31	6	3	22.08	115	82
RATIO 87 --- TOTAL CONTROLLABLE EXPENSES PER CONSUMER (\$) (SAME AS RATIO #104)																
2009	<div></div>	403.19	816	618	412.37	27	24	365.56	67	46	413.50	6	6	390.00	7	6
2010	<div></div>	422.47	815	506	439.50	27	21	378.69	69	33	458.72	6	6	414.37	10	7
2011	<div></div>	438.73	814	465	477.90	27	20	393.79	70	32	488.86	6	6	417.88	11	7
2012	<div></div>	441.40	813	502	481.18	27	22	405.20	69	34	506.31	6	6	637.13	8	7
2013	<div></div>	459.84	815	489	494.72	27	23	418.19	67	30	517.87	6	6	483.64	115	74
FIXED EXPENSES (RATIOS 88–102)																
RATIO 88 --- POWER COST PER KWH PURCHASED (MILLS)																
2009	<div></div>	61.10	814	437	63.67	27	17	64.71	67	42	56.64	6	1	70.21	7	5
2010	<div></div>	62.12	814	389	68.00	27	18	63.06	69	35	61.74	6	2	64.52	10	8
2011	<div></div>	64.72	813	423	76.00	27	24	65.84	70	42	63.48	6	3	64.50	11	7
2012	<div></div>	66.51	812	438	80.84	27	25	66.57	69	39	65.07	6	4	52.71	8	2
2013	<div></div>	67.70	814	346	76.98	27	21	67.37	67	28	69.49	6	3	68.96	115	52
RATIO 89 --- POWER COST PER TOTAL KWH SOLD (MILLS)																
2009	<div></div>	64.59	816	427	69.26	27	17	68.96	67	41	60.11	6	1	74.08	7	5
2010	<div></div>	66.26	815	372	72.81	27	17	67.59	69	34	66.07	6	1	69.85	10	7
2011	<div></div>	68.44	814	391	82.32	27	21	68.93	70	35	67.43	6	1	69.16	11	6
2012	<div></div>	70.44	813	423	87.77	27	25	69.07	69	35	69.53	6	4	55.83	8	2
2013	<div></div>	71.68	815	345	85.03	27	22	71.30	67	27	73.85	6	3	72.16	115	51
RATIO 90 --- POWER COST AS A % OF REVENUE																
2009	<div></div>	62.30	817	293	58.28	27	6	65.76	67	34	68.37	6	5	71.24	7	6
2010	<div></div>	62.54	816	350	59.35	27	8	65.63	69	38	68.55	6	6	68.15	10	7
2011	<div></div>	63.18	815	381	62.46	27	7	65.62	70	45	67.68	6	5	67.75	11	7
2012	<div></div>	63.02	813	259	62.78	27	6	65.40	69	27	67.71	6	4	62.61	8	3
2013	<div></div>	63.05	815	207	60.15	27	5	65.21	67	19	69.07	6	4	62.89	115	28

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 16

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 91 --- LONG-TERM INTEREST COST PER TOTAL KWH SOLD (MILLS)																
2009	<div></div>	5.16	809	421	6.57	27	19	4.54	67	29	4.21	6	2	5.53	7	6
2010	<div></div>	4.97	807	328	6.20	27	16	4.35	69	25	4.72	6	2	5.33	10	5
2011	<div></div>	4.97	805	345	6.14	27	19	4.15	70	22	4.99	6	3	4.86	11	5
2012	<div></div>	5.09	806	413	6.52	27	20	4.41	69	25	4.82	6	3	5.99	8	6
2013	<div></div>	4.93	808	354	6.70	27	17	4.36	67	22	5.02	6	2	5.06	113	55
RATIO 92 --- LONG-TERM INTEREST COST AS A % OF TUP																
2009	<div></div>	2.19	809	571	1.92	27	19	2.03	67	45	1.85	6	4	2.52	7	6
2010	<div></div>	2.12	807	428	2.08	27	14	2.04	69	32	2.12	6	4	2.29	10	7
2011	<div></div>	2.04	805	472	1.96	27	16	2.00	70	42	2.12	6	5	1.90	11	6
2012	<div></div>	1.93	806	453	1.93	27	17	1.87	69	39	2.09	6	4	2.00	8	6
2013	<div></div>	1.88	808	339	1.96	27	10	1.84	67	24	2.13	6	4	1.88	113	47
RATIO 93 --- LONG-TERM INTEREST COST PER CONSUMER (\$)																
2009	<div></div>	102.64	809	475	101.53	27	17	92.47	67	34	112.38	6	4	144.00	7	7
2010	<div></div>	102.90	807	347	109.77	27	13	95.19	69	22	132.56	6	5	138.94	10	8
2011	<div></div>	102.75	805	371	115.15	27	16	93.46	70	22	145.88	6	5	133.69	11	9
2012	<div></div>	100.83	806	339	115.50	27	16	92.34	69	20	146.95	6	5	134.79	8	6
2013	<div></div>	100.68	808	275	121.14	27	13	88.25	67	18	148.55	6	5	108.67	113	47
RATIO 94 --- DEPRECIATION EXPENSE PER TOTAL KWH SOLD (MILLS)																
2009	<div></div>	6.81	816	450	8.88	27	20	6.17	67	31	5.70	6	3	5.74	7	2
2010	<div></div>	6.88	815	367	8.34	27	19	6.47	69	24	5.78	6	2	5.95	10	3
2011	<div></div>	7.19	814	376	8.64	27	18	6.87	70	26	6.01	6	1	6.56	11	4
2012	<div></div>	7.62	813	481	9.29	27	20	7.31	69	39	6.08	6	3	6.73	8	4
2013	<div></div>	7.79	815	454	9.50	27	21	7.36	67	34	6.50	6	3	7.85	115	67
RATIO 95 --- DEPRECIATION EXPENSE AS A % OF TUP																
2009	<div></div>	2.86	817	787	2.60	27	27	2.82	67	65	2.44	6	6	2.55	7	6
2010	<div></div>	2.87	816	651	2.66	27	18	2.87	69	60	2.59	6	3	2.60	10	5
2011	<div></div>	2.89	815	672	2.64	27	18	2.93	70	62	2.59	6	4	2.85	11	7
2012	<div></div>	2.90	813	663	2.72	27	20	2.94	69	60	2.69	6	6	2.41	8	2
2013	<div></div>	2.91	815	620	2.74	27	18	2.96	67	58	2.74	6	5	2.91	115	87
RATIO 96 --- DEPRECIATION EXPENSE PER CONSUMER (\$)																
2009	<div></div>	135.05	816	523	139.24	27	20	122.04	67	35	143.58	6	6	137.17	7	6
2010	<div></div>	141.53	815	422	145.03	27	18	129.34	69	29	153.62	6	6	151.02	10	7
2011	<div></div>	147.94	814	413	149.16	27	16	140.89	70	30	169.19	6	6	158.73	11	8
2012	<div></div>	153.60	813	396	155.32	27	14	143.40	69	29	188.22	6	5	184.57	8	5
2013	<div></div>	159.09	815	358	165.80	27	14	146.42	67	19	201.71	6	5	168.08	115	59

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 17

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 97 --- ACCUMULATIVE DEPRECIATION AS A % OF PLANT IN SERVICE																
2009		30.88	817	112	32.66	27	4	26.90	67	4	38.30	6	2	34.55	7	1
2010		31.07	816	131	33.25	27	3	27.06	69	6	37.34	6	1	35.81	10	3
2011		31.33	815	146	33.29	27	3	27.43	70	6	34.72	6	1	35.86	11	3
2012		31.48	813	214	31.22	27	5	28.48	69	10	34.18	6	1	32.03	8	2
2013		31.62	815	257	28.87	27	5	29.41	67	12	31.96	6	2	30.07	115	25
RATIO 98 --- TOTAL TAX EXPENSE PER TOTAL KWH SOLD (MILLS)																
2009		1.00	595	517	0.01	11	5	0.98	55	47	0.01	3	2	0.39	6	5
2010		1.00	591	544	0.00	14	5	0.97	56	54	0.00	3	2	0.35	8	7
2011		1.01	587	527	0.00	10	4	0.97	56	50	1.76	2	2	0.59	9	8
2012		1.02	588	533	0.01	12	7	1.08	55	49	1.90	2	2	1.11	5	4
2013		1.03	587	537	0.00	10	5	1.16	52	49	2.44	2	2	1.11	91	86
RATIO 99 --- TOTAL TAX EXPENSE AS A % OF TUP																
2009		0.42	596	521	0.00	11	6	0.40	55	49	0.01	3	3	0.05	6	5
2010		0.41	592	547	0.00	14	5	0.43	56	54	0.00	3	2	0.08	8	7
2011		0.42	588	528	0.00	10	4	0.38	56	50	0.74	2	2	0.08	9	8
2012		0.41	588	536	0.00	12	7	0.38	55	49	0.77	2	2	0.72	5	4
2013		0.43	587	540	0.00	10	5	0.43	52	49	0.81	2	2	0.44	91	86
RATIO 100 --- TOTAL TAX EXPENSE PER CONSUMER																
2009		21.14	595	515	0.22	11	6	16.88	55	48	0.36	3	3	7.94	6	5
2010		22.00	591	544	0.01	14	5	19.77	56	54	0.04	3	2	9.39	8	7
2011		23.36	587	525	0.04	10	4	19.46	56	50	55.60	2	2	10.48	9	8
2012		22.70	588	529	0.21	12	7	18.88	55	48	59.09	2	2	102.43	5	4
2013		23.52	587	533	0.05	10	5	22.16	52	47	63.93	2	2	26.45	91	85
RATIO 101 --- TOTAL FIXED EXPENSES PER TOTAL KWH SOLD (MILLS)																
2009		78.14	816	454	82.86	27	18	79.52	67	42	71.75	6	2	87.71	7	5
2010		79.00	815	346	89.13	27	19	81.33	69	32	78.07	6	2	80.44	10	5
2011		81.50	814	368	97.97	27	20	82.61	70	35	79.66	6	2	83.04	11	6
2012		83.84	813	449	104.59	27	23	81.68	69	36	79.90	6	3	73.63	8	2
2013		84.61	815	330	100.40	27	21	83.42	67	26	84.87	6	3	83.95	115	45
RATIO 102 --- TOTAL FIXED EXPENSES PER CONSUMER (\$)																
2009		1,513.63	816	508	1,370.03	27	14	1,549.12	67	51	2,077.36	6	6	2,155.51	7	7
2010		1,601.50	815	411	1,563.92	27	12	1,676.17	69	43	2,350.08	6	6	2,347.65	10	9
2011		1,640.97	814	409	1,708.96	27	15	1,691.45	70	40	2,461.50	6	6	2,335.74	11	10
2012		1,637.96	813	295	1,825.85	27	14	1,672.86	69	23	2,425.98	6	6	2,380.12	8	5
2013		1,693.85	815	250	1,712.52	27	10	1,696.14	67	16	2,593.37	6	6	1,824.68	115	42

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 18

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
TOTAL EXPENSES (RATIOS 103–107)																
RATIO 103 --- TOTAL OPERATING EXPENSES PER TOTAL KWH SOLD (MILLS)																
2009		20.27	816	506	23.54	27	21	18.90	67	36	13.87	6	2	14.92	7	3
2010		20.31	815	430	23.65	27	20	19.00	69	27	15.39	6	2	17.09	10	4
2011		21.11	814	412	26.43	27	20	18.98	70	25	16.58	6	2	19.63	11	4
2012		21.98	813	553	28.18	27	21	20.09	69	42	16.43	6	2	19.13	8	5
2013		21.76	815	547	31.33	27	24	20.20	67	41	18.31	6	3	22.08	115	82
RATIO 104 --- TOTAL OPERATING EXPENSES PER CONSUMER (\$)																
2009		403.19	816	618	412.37	27	24	365.56	67	46	413.50	6	6	390.00	7	6
2010		422.47	815	506	439.50	27	21	378.69	69	33	458.72	6	6	414.37	10	7
2011		438.73	814	465	477.90	27	20	393.79	70	32	488.86	6	6	417.88	11	7
2012		441.40	813	502	481.18	27	22	405.20	69	34	506.31	6	6	637.13	8	7
2013		459.84	815	489	494.72	27	23	418.19	67	30	517.87	6	6	483.64	115	74
RATIO 105 --- TOTAL COST OF SERVICE (MINUS POWER COSTS) PER TOTAL KWH SOLD (MILLS)																
2009		34.03	816	499	40.33	27	21	31.64	67	38	25.57	6	2	30.73	7	4
2010		33.59	815	410	40.30	27	20	32.03	69	26	28.46	6	2	29.60	10	4
2011		34.84	814	406	42.75	27	20	32.78	70	24	29.14	6	2	27.43	11	5
2012		36.21	813	531	48.08	27	23	34.84	69	41	27.78	6	3	33.54	8	5
2013		36.15	815	507	46.04	27	23	33.86	67	38	29.01	6	3	38.18	115	73
RATIO 106 --- TOTAL COST OF ELECTRIC SERVICE PER TOTAL KWH SOLD (MILLS)																
2009		97.39	816	481	107.53	27	19	96.76	67	41	85.09	6	2	104.04	7	5
2010		98.46	815	352	109.29	27	20	96.96	69	29	94.00	6	2	100.87	10	4
2011		102.17	814	370	123.75	27	21	100.83	70	30	96.26	6	2	102.53	11	5
2012		104.95	813	500	130.45	27	24	101.52	69	39	95.23	6	3	92.61	8	4
2013		105.90	815	401	130.08	27	23	101.50	67	28	101.39	6	3	105.40	115	54
RATIO 107 --- TOTAL COST OF ELECTRIC SERVICE PER CONSUMER (\$)																
2009		1,912.47	816	545	1,737.47	27	15	1,927.21	67	50	2,489.67	6	6	2,567.38	7	7
2010		2,023.01	815	442	1,982.02	27	14	2,077.42	69	43	2,808.80	6	6	2,781.53	10	8
2011		2,063.12	814	413	2,188.95	27	16	2,065.43	70	38	2,971.79	6	6	2,888.95	11	9
2012		2,063.59	813	320	2,276.19	27	15	2,095.17	69	24	2,902.62	6	6	2,907.00	8	5
2013		2,135.19	815	282	2,352.20	27	12	2,128.58	67	18	3,087.50	6	6	2,284.15	115	48
EMPLOYEES (RATIOS 108–113)																
RATIO 108 --- AVERAGE WAGE RATE PER HOUR (\$)																
2009		28.44	814	99	27.85	27	2	28.14	67	10	30.73	6	1	30.70	7	1
2010		29.37	812	353	29.25	26	12	28.29	69	26	29.83	6	3	31.42	9	8
2011		30.50	813	299	30.14	27	8	29.58	70	21	31.65	6	3	33.71	11	8
2012		31.51	812	257	31.72	27	7	31.23	69	20	33.08	6	3	31.29	8	2
2013		32.41	814	273	32.29	27	8	31.01	67	18	34.33	6	3	32.96	114	45

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 19

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 109 --- TOTAL WAGES PER TOTAL KWH SOLD (MILLS)																
2009	<div></div>	10.93	815	299	15.74	27	18	9.65	67	14	9.56	6	2	9.25	7	2
2010	<div></div>	10.59	813	325	15.05	26	21	9.05	69	17	10.83	6	3	11.23	10	5
2011	<div></div>	10.77	813	309	14.58	27	19	9.33	70	17	9.50	6	2	8.18	11	3
2012	<div></div>	11.42	812	398	15.52	27	20	10.30	69	25	9.77	6	2	12.82	8	5
2013	<div></div>	11.33	814	391	15.34	27	21	10.31	67	23	10.84	6	3	11.68	114	58
RATIO 110 --- TOTAL WAGES PER CONSUMER (\$)																
2009	<div></div>	218.38	815	371	271.39	27	23	194.32	67	20	265.88	6	6	232.23	7	4
2010	<div></div>	220.57	813	360	279.44	26	21	188.34	69	21	272.29	6	5	286.57	10	7
2011	<div></div>	226.74	813	353	290.93	27	21	200.80	70	20	281.69	6	6	282.77	11	7
2012	<div></div>	233.03	812	329	295.47	27	21	207.56	69	19	294.41	6	6	364.53	8	7
2013	<div></div>	236.93	814	326	298.31	27	20	210.09	67	20	308.12	6	6	250.71	114	52
RATIO 111 --- OVERTIME HOURS/TOTAL HOURS (%)																
2009	<div></div>	4.94	814	681	5.37	27	24	5.89	67	65	4.72	6	5	5.20	7	7
2010	<div></div>	4.61	813	753	3.85	27	24	4.90	69	69	3.75	6	6	4.41	9	8
2011	<div></div>	4.91	813	766	3.70	27	24	5.52	70	70	3.98	6	5	6.97	11	10
2012	<div></div>	4.47	812	729	3.49	27	21	5.45	69	68	4.01	6	5	4.34	8	8
2013	<div></div>	4.45	814	787	2.82	27	24	4.98	67	67	3.42	6	5	4.42	115	111
RATIO 112 --- CAPITALIZED PAYROLL / TOTAL PAYROLL (%)																
2009	<div></div>	22.12	812	63	31.48	27	12	23.90	67	6	31.37	6	2	23.73	7	1
2010	<div></div>	22.47	812	60	35.21	26	14	24.02	69	8	26.28	6	2	23.76	10	3
2011	<div></div>	21.95	810	72	33.34	26	15	23.88	70	7	24.19	6	2	23.52	11	2
2012	<div></div>	22.54	810	50	33.18	27	11	24.53	69	6	25.55	6	1	26.91	8	1
2013	<div></div>	21.93	811	50	29.85	27	9	24.00	67	7	23.31	6	1	23.03	114	12
RATIO 113 --- AVERAGE CONSUMERS PER EMPLOYEE																
2009	<div></div>	287.19	816	433	217.11	27	7	324.59	67	47	244.31	6	1	279.10	7	4
2010	<div></div>	291.20	815	431	225.08	27	6	328.58	69	49	251.81	6	1	261.16	10	4
2011	<div></div>	295.78	814	411	225.84	27	5	325.33	70	45	247.02	6	1	250.38	11	5
2012	<div></div>	299.13	813	421	235.63	27	6	315.93	69	48	245.97	6	1	196.10	8	2
2013	<div></div>	303.83	815	445	232.35	27	5	328.37	67	49	240.92	6	1	289.39	115	57
GROWTH (RATIOS 114–121)																
RATIO 114 --- ANNUAL GROWTH IN KWH SOLD (%)																
2009	<div></div>	−1.06	816	387	−0.31	27	17	−2.19	67	25	−0.65	6	4	−0.83	7	4
2010	<div></div>	4.80	813	284	6.59	27	10	7.56	68	36	4.93	6	1	7.00	10	5
2011	<div></div>	−0.13	814	304	2.24	27	16	−0.54	70	25	4.22	6	6	1.32	11	6
2012	<div></div>	−2.02	811	43	−1.48	27	1	−3.64	69	2	1.97	6	1	−1.88	8	2
2013	<div></div>	3.13	811	547	1.38	27	12	2.57	67	41	1.18	6	2	3.97	115	81

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 20

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 115 --- ANNUAL GROWTH IN NUMBER OF CONSUMERS (%)																
2009	<div></div>	0.47	816	343	1.00	27	16	0.59	67	32	1.31	6	6	0.64	7	4
2010	<div></div>	0.37	813	299	0.47	27	12	0.41	68	24	0.99	6	6	0.37	10	4
2011	<div></div>	0.30	814	393	0.46	27	16	0.37	70	38	0.68	6	6	0.63	11	7
2012	<div></div>	0.43	811	327	0.39	27	10	0.55	69	32	0.83	6	4	0.74	8	5
2013	<div></div>	0.50	811	213	0.51	27	5	0.50	67	16	0.98	6	3	0.63	115	40
RATIO 116 --- ANNUAL GROWTH IN TUP DOLLARS (%)																
2009	<div></div>	4.40	817	400	4.89	27	16	4.34	67	31	6.09	6	5	7.64	7	6
2010	<div></div>	3.92	814	464	4.37	27	16	3.87	68	44	5.32	6	5	9.22	10	10
2011	<div></div>	3.92	815	138	3.61	27	7	3.70	70	9	5.57	6	3	6.41	11	7
2012	<div></div>	3.85	811	160	4.49	27	4	3.82	69	10	4.32	6	1	7.41	8	5
2013	<div></div>	3.76	811	252	3.68	27	10	4.03	67	21	5.75	6	5	4.95	115	66
RATIO 117 --- CONST. W.I.P. TO PLANT ADDITIONS (%)																
2009	<div></div>	27.25	808	429	51.90	25	15	26.85	67	37	56.24	6	4	31.06	7	6
2010	<div></div>	30.09	808	505	35.10	27	17	25.97	69	43	72.68	6	5	59.20	10	7
2011	<div></div>	26.98	808	275	36.35	25	12	28.64	70	21	32.16	6	3	46.61	11	7
2012	<div></div>	27.43	808	763	22.59	27	27	21.00	69	65	20.92	6	6	87.96	8	8
2013	<div></div>	26.91	807	611	21.64	27	18	18.75	66	54	27.62	6	5	29.65	115	88
RATIO 118 --- NET NEW SERVICES TO TOTAL SERVICES (%)																
2009	<div></div>	0.66	813	535	0.50	27	15	0.76	67	50	0.73	6	4	0.43	7	4
2010	<div></div>	0.56	811	529	0.37	27	14	0.78	69	56	0.67	6	4	0.51	10	7
2011	<div></div>	0.52	805	359	0.49	27	10	0.72	70	40	1.23	6	5	0.60	11	6
2012	<div></div>	0.60	806	426	0.43	27	13	0.67	69	42	1.08	6	6	−0.17	8	3
2013	<div></div>	0.61	810	564	0.42	27	16	0.66	67	52	0.74	6	6	0.71	114	83
RATIO 119 --- ANNUAL GROWTH IN TOTAL CAPITALIZATION (%)																
2009	<div></div>	4.11	817	188	5.51	27	9	4.09	67	17	7.21	6	2	8.94	7	4
2010	<div></div>	4.05	814	626	4.08	27	25	6.19	68	58	9.89	6	6	8.68	10	9
2011	<div></div>	3.86	815	252	6.04	27	14	3.48	70	17	9.38	6	5	18.19	11	10
2012	<div></div>	3.68	811	7	6.90	27	1	4.41	69	1	12.15	6	1	7.50	8	1
2013	<div></div>	5.51	811	88	10.15	27	9	6.21	67	8	12.64	6	4	6.34	115	15
RATIO 120 --- 2 YR. COMPOUND GROWTH IN TOTAL CAPITALIZATION (%)																
2009	<div></div>	5.05	816	6	6.79	27	1	4.79	67	1	7.46	6	1	15.19	7	3
2010	<div></div>	4.54	814	367	6.69	27	16	5.10	68	36	8.36	6	6	9.39	10	10
2011	<div></div>	4.20	813	468	5.01	27	20	4.65	69	47	9.63	6	5	11.84	11	10
2012	<div></div>	3.90	811	19	6.31	27	4	3.43	69	2	12.29	6	1	10.95	8	2
2013	<div></div>	4.82	810	13	10.02	27	2	4.71	67	2	15.40	6	2	5.79	115	2

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 21

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 121 --- 5YR. COMPOUND GROWTH IN TOTAL CAPITALIZATION (%)																
2009	<div></div>	5.65	808	13	8.57	27	2	5.28	67	2	17.49	6	2	22.52	7	7
2010	<div></div>	5.36	809	16	7.28	27	3	5.03	68	2	16.55	6	3	25.59	10	9
2011	<div></div>	5.16	808	13	9.43	27	2	4.87	69	1	17.55	6	2	25.38	11	10
2012	<div></div>	4.67	808	5	7.35	27	1	4.49	68	1	10.52	6	1	11.26	8	1
2013	<div></div>	4.84	809	40	7.93	27	5	4.86	66	3	10.79	6	3	6.09	115	3
PLANT (RATIOS 122–145)																
RATIO 122 --- TUP INVESTMENTS PER TOTAL KWH SOLD (CENTS)																
2009	<div></div>	23.89	816	255	32.08	27	16	22.27	67	11	19.44	6	1	21.94	7	2
2010	<div></div>	24.10	815	281	31.56	27	18	22.34	69	11	19.12	6	2	22.22	10	3
2011	<div></div>	24.89	814	282	32.24	27	18	22.32	70	12	21.37	6	1	24.40	11	4
2012	<div></div>	26.26	813	389	34.51	27	21	23.88	69	30	22.20	6	2	26.83	8	5
2013	<div></div>	26.69	815	376	35.02	27	22	24.39	67	24	24.09	6	3	27.99	115	59
RATIO 123 --- TUP INVESTMENT PER CONSUMER (\$)																
2009	<div></div>	4,676.44	816	320	5,407.91	27	15	4,369.98	67	19	5,964.85	6	6	5,222.04	7	4
2010	<div></div>	4,854.04	815	327	5,492.58	27	15	4,506.24	69	20	6,048.76	6	6	6,111.71	10	7
2011	<div></div>	5,011.44	814	306	5,739.56	27	15	4,688.63	70	17	6,734.64	6	6	6,709.04	11	8
2012	<div></div>	5,190.76	813	294	5,954.63	27	13	4,875.29	69	17	6,986.46	6	5	8,585.72	8	7
2013	<div></div>	5,388.50	815	292	6,225.03	27	14	5,022.83	67	15	7,358.94	6	5	5,709.71	115	48
RATIO 124 --- TUP INVESTMENT PER MILE OF LINE (\$)																
2009	<div></div>	26,205.55	816	622	16,250.47	27	9	32,239.32	67	64	23,774.92	6	4	43,250.88	7	7
2010	<div></div>	27,285.65	815	629	17,807.44	27	10	33,307.67	69	66	25,367.38	6	4	49,018.23	10	10
2011	<div></div>	28,234.95	814	617	18,381.28	27	10	33,680.32	70	65	25,981.98	6	4	54,646.96	11	11
2012	<div></div>	29,417.94	813	602	18,773.34	27	10	35,881.74	69	62	26,339.06	6	4	17,559.30	8	3
2013	<div></div>	30,849.84	814	605	20,275.85	27	10	35,247.69	67	58	28,003.86	6	4	29,536.64	115	85
RATIO 125 --- AVERAGE CONSUMERS PER MILE																
2009	<div></div>	5.93	816	609	3.16	27	11	6.96	67	66	3.88	6	4	9.04	7	7
2010	<div></div>	5.94	815	610	3.16	27	11	6.87	69	68	3.88	6	4	8.82	10	9
2011	<div></div>	5.96	814	606	3.18	27	10	6.93	70	69	3.88	6	4	11.26	11	9
2012	<div></div>	5.97	813	604	3.19	27	10	7.06	69	68	3.88	6	4	2.88	8	4
2013	<div></div>	6.01	814	608	3.36	27	10	6.86	67	66	3.89	6	4	5.89	115	81
RATIO 126 --- DISTRIBUTION PLANT PER TOTAL KWH SOLD (MILLS)																
2009	<div></div>	199.69	816	401	243.48	27	18	190.01	67	26	146.98	6	2	171.21	7	2
2010	<div></div>	201.11	815	425	245.06	27	19	190.43	69	29	141.13	6	2	175.03	10	4
2011	<div></div>	208.59	814	427	250.97	27	20	194.08	70	30	139.40	6	2	150.88	11	3
2012	<div></div>	220.48	813	515	264.95	27	21	207.18	69	43	145.14	6	2	185.05	8	4
2013	<div></div>	222.19	814	500	281.28	27	21	208.17	67	40	166.33	6	2	227.57	115	73

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 22

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 127 --- DISTRIBUTION PLANT PER CONSUMER (\$)																
2009		3,894.36	816	480	4,298.33	27	18	3,812.29	67	37	4,380.09	6	5	3,869.96	7	5
2010		4,029.11	815	465	4,369.94	27	17	3,897.13	69	36	4,230.86	6	4	4,087.93	10	7
2011		4,201.83	814	458	4,563.07	27	17	4,077.79	70	37	4,352.72	6	5	4,061.64	11	7
2012		4,344.49	813	434	4,693.33	27	17	4,289.77	69	36	4,655.74	6	5	6,358.09	8	7
2013		4,497.59	814	432	5,070.43	27	17	4,408.12	67	34	4,900.95	6	5	4,717.72	115	68
RATIO 128 --- DISTRIBUTION PLANT PER EMPLOYEE (\$)																
2009		1,141,956.32	816	542	987,385.83	27	11	1,172,040.94	67	52	1,038,591.43	6	4	1,145,200.34	7	5
2010		1,198,286.18	815	529	1,027,159.89	27	10	1,260,391.49	69	50	1,174,140.06	6	4	1,128,733.53	10	6
2011		1,256,196.39	814	487	1,052,680.06	27	9	1,325,342.04	70	50	1,225,822.15	6	4	1,183,431.95	11	6
2012		1,313,328.99	813	474	1,126,586.70	27	10	1,336,559.32	69	45	1,266,466.77	6	4	1,234,507.07	8	4
2013		1,366,714.35	814	510	1,137,284.59	27	10	1,430,219.54	67	49	1,298,683.85	6	4	1,382,195.91	115	78
RATIO 129 --- GENERAL PLANT PER TOTAL KWH SOLD (MILLS)																
2009		15.68	816	446	20.66	27	20	14.33	67	30	13.18	6	3	13.94	7	2
2010		15.59	815	481	20.90	27	20	13.67	69	34	13.15	6	3	12.95	10	4
2011		16.46	813	458	20.75	27	20	14.61	69	31	14.08	6	3	12.54	11	4
2012		17.17	812	528	21.45	27	20	15.23	68	40	13.93	6	3	15.82	8	5
2013		17.42	813	500	23.56	27	20	15.38	66	36	14.40	6	3	19.41	115	78
RATIO 130 --- GENERAL PLANT PER CONSUMER (\$)																
2009		314.82	816	507	360.89	27	22	271.39	67	35	329.71	6	5	314.98	7	5
2010		330.11	815	510	383.18	27	22	285.11	69	37	360.23	6	5	398.95	10	8
2011		340.41	813	487	393.74	27	21	291.44	69	33	383.02	6	5	454.41	11	7
2012		354.59	812	472	398.22	27	22	304.39	68	30	395.13	6	6	491.81	8	7
2013		366.46	813	452	422.62	27	20	315.58	66	26	399.84	6	5	410.88	115	74
RATIO 131 --- GENERAL PLANT PER EMPLOYEE (\$)																
2009		87,912.69	816	555	77,010.50	27	15	85,753.85	67	46	78,272.64	6	4	93,209.20	7	7
2010		92,827.10	815	580	80,170.22	27	16	89,693.96	69	46	88,491.31	6	4	107,639.82	10	9
2011		96,575.58	813	497	87,331.74	27	13	90,772.44	69	40	95,044.91	6	4	105,861.68	11	10
2012		100,971.68	812	506	92,318.51	27	14	97,714.38	68	40	99,470.07	6	4	92,204.26	8	4
2013		105,885.40	813	503	97,583.65	27	14	101,648.92	66	38	100,833.83	6	4	112,355.82	115	80
RATIO 132 --- HEADQUARTERS PLANT PER TOTAL KWH SOLD (MILLS)																
2009		7.87	767	411	7.40	25	13	7.61	62	32	7.40	5	3	7.40	7	4
2010		7.87	764	443	6.98	25	14	6.40	63	31	6.97	5	3	6.97	9	5
2011		8.33	764	477	7.28	25	14	6.75	64	32	7.28	5	4	7.87	10	7
2012		8.76	763	474	8.86	26	16	7.42	63	33	8.60	5	4	8.08	8	5
2013		8.94	763	503	9.21	25	17	7.60	62	34	9.09	5	5	9.85	101	75

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 23

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 133 --- HEADQUARTERS PLANT PER CONSUMER (\$)																
2009	<div></div>	159.95	767	456	135.19	25	13	142.27	62	34	181.20	5	5	135.19	7	4
2010	<div></div>	167.47	764	465	138.91	25	14	144.26	63	34	193.50	5	5	136.09	9	5
2011	<div></div>	179.48	764	495	140.43	25	15	147.83	64	36	310.08	5	5	248.09	10	8
2012	<div></div>	186.15	763	442	171.21	26	14	159.23	63	31	320.48	5	5	216.18	8	7
2013	<div></div>	197.56	763	481	188.75	25	15	168.70	62	34	324.34	5	5	230.12	101	70
RATIO 134 --- HEADQUARTERS PLANT PER EMPLOYEE (\$)																
2009	<div></div>	43,663.11	767	458	27,913.38	25	10	42,063.80	62	37	38,105.73	5	4	37,730.76	7	4
2010	<div></div>	46,505.67	764	475	28,804.00	25	9	43,457.29	63	39	40,382.54	5	4	38,654.94	9	5
2011	<div></div>	48,256.15	764	491	31,737.70	25	11	43,061.34	64	40	70,741.90	5	5	60,003.00	10	8
2012	<div></div>	52,037.56	763	420	39,624.23	26	10	47,090.31	63	31	70,537.76	5	4	52,487.83	8	5
2013	<div></div>	56,399.50	763	476	41,862.33	25	11	53,151.99	62	36	77,302.91	5	5	62,404.86	101	70
RATIO 135 --- TRANSMISSION PLANT PER TOTAL KWH SOLD (MILLS)																
2009	<div></div>	12.02	413	44	11.10	24	3	8.09	30	2	19.31	6	1	25.31	4	1
2010	<div></div>	13.07	410	49	10.16	24	3	10.08	32	2	19.87	6	1	24.67	6	2
2011	<div></div>	12.85	409	44	9.67	24	3	5.25	32	1	20.02	6	1	21.16	6	2
2012	<div></div>	13.20	410	43	10.40	24	3	5.37	32	1	20.59	6	1	10.99	5	1
2013	<div></div>	13.35	412	44	10.80	24	3	8.25	30	2	23.96	6	1	7.24	60	9
RATIO 136 --- TRANSMISSION PLANT PER CONSUMER (\$)																
2009	<div></div>	234.16	413	67	179.77	24	4	178.66	30	3	623.83	6	3	793.46	4	3
2010	<div></div>	248.28	410	67	180.21	24	3	201.52	32	4	654.16	6	2	812.67	6	3
2011	<div></div>	251.25	409	61	190.34	24	3	153.35	32	3	677.69	6	2	844.20	6	3
2012	<div></div>	267.62	410	51	227.45	24	2	152.44	32	1	688.90	6	1	362.85	5	2
2013	<div></div>	279.67	412	54	225.55	24	2	181.47	30	2	718.51	6	1	147.58	60	7
RATIO 137 --- TRANSMISSION PLANT PER EMPLOYEE (\$)																
2009	<div></div>	68,926.21	413	52	49,149.75	24	2	51,962.45	30	3	153,963.99	6	1	202,958.01	4	2
2010	<div></div>	71,810.98	410	52	49,474.64	24	2	56,988.36	32	3	164,952.34	6	1	210,643.43	6	1
2011	<div></div>	73,899.91	409	47	52,772.92	24	2	48,689.01	32	2	166,573.65	6	1	201,885.39	6	2
2012	<div></div>	75,014.91	410	40	58,495.41	24	2	49,341.33	32	2	163,717.56	6	1	123,304.18	5	1
2013	<div></div>	78,874.97	412	44	58,275.71	24	2	51,355.52	30	3	166,189.44	6	1	44,094.20	60	9
RATIO 138 --- IDLE SERVICES TO TOTAL SERVICE (%)																
2009	<div></div>	7.86	796	553	6.57	27	20	9.92	65	52	6.14	6	5	6.09	6	5
2010	<div></div>	8.12	793	525	7.23	27	17	10.88	68	54	5.65	6	4	6.34	8	6
2011	<div></div>	8.00	793	511	7.49	27	18	10.78	70	57	5.75	6	4	5.75	10	6
2012	<div></div>	7.88	791	540	7.67	26	20	10.47	69	57	5.49	6	4	9.72	8	6
2013	<div></div>	7.60	793	661	6.91	26	23	10.00	67	61	5.18	6	5	8.33	112	92

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

Page 24

Year	System Value	US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)		
		Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank
RATIO 139 --- LINE LOSS (%)																
2009	<div></div>	5.96	814	226	7.54	27	16	5.53	67	14	6.17	6	3	5.10	7	2
2010	<div></div>	5.98	814	242	7.36	27	15	5.63	69	11	6.28	6	3	5.69	10	4
2011	<div></div>	5.41	813	209	6.97	27	16	4.75	70	9	5.84	6	3	4.70	11	3
2012	<div></div>	5.80	812	284	6.73	27	17	5.76	69	21	5.50	6	3	6.14	8	3
2013	<div></div>	5.64	814	346	6.68	27	20	5.37	67	25	5.93	6	4	5.63	115	48
RATIO 140 --- SYSTEM AVG. INTERRUPTION DURATION INDEX (SAIDI) – POWER SUPPLIER																
2009	<div></div>	14.80	817	389	84.81	27	20	16.20	67	34	15.19	6	3	7.40	7	3
2010	<div></div>	15.76	816	427	28.30	27	21	19.26	69	39	11.06	6	3	18.01	10	6
2011	<div></div>	15.63	815	548	84.10	27	25	23.47	70	49	23.02	6	5	5.16	11	8
2012	<div></div>	12.16	813	378	71.02	27	23	19.71	69	36	8.04	6	3	62.01	8	6
2013	<div></div>	13.56	815	473	90.07	27	25	21.00	67	45	40.01	6	6	15.90	115	70
RATIO 141 --- SYSTEM AVG. INTERRUPTION DURATION INDEX (SAIDI) – EXTREME STORM																
2009	<div></div>	19.83	817	375	95.40	27	18	7.01	67	28	0.00	6	2	31.10	7	5
2010	<div></div>	18.79	816	241	12.00	27	7	6.30	69	19	6.00	6	1	44.35	10	4
2011	<div></div>	43.02	815	255	4.49	27	4	34.90	70	20	11.88	6	1	45.00	11	4
2012	<div></div>	16.06	813	161	18.00	27	5	15.04	69	18	60.66	6	2	0.00	8	2
2013	<div></div>	25.57	815	487	30.57	27	17	31.35	67	42	8.37	6	4	28.91	115	67
RATIO 142 --- SYSTEM AVG. INTERRUPTION DURATION INDEX (SAIDI) – PREARRANGED																
2009	<div></div>	2.59	817	229	3.48	27	10	2.00	67	19	3.74	6	2	0.60	7	2
2010	<div></div>	2.23	816	82	6.00	27	5	3.00	69	8	9.45	6	1	1.62	10	2
2011	<div></div>	2.49	815	419	3.07	27	17	2.74	70	37	2.70	6	4	0.16	11	5
2012	<div></div>	2.10	813	389	2.50	27	14	3.94	69	40	6.32	6	4	1.25	8	4
2013	<div></div>	2.40	815	418	3.00	27	15	2.76	67	37	11.92	6	4	3.27	115	65
RATIO 143 --- SYSTEM AVG. INTERRUPTION DURATION INDEX (SAIDI) – ALL OTHER																
2009	<div></div>	95.40	817	577	91.80	27	22	110.50	67	54	69.22	6	6	100.80	7	6
2010	<div></div>	97.35	816	478	90.74	27	17	88.86	69	37	73.94	6	3	89.65	10	6
2011	<div></div>	99.50	815	429	119.80	27	18	109.78	70	42	119.60	6	4	92.17	11	6
2012	<div></div>	87.00	813	428	107.80	27	15	108.93	69	45	78.42	6	3	86.35	8	5
2013	<div></div>	89.41	815	611	102.51	27	21	108.60	67	58	81.13	6	5	92.00	115	83
RATIO 144 --- SYSTEM AVG. INTERRUPTION DURATION INDEX (SAIDI) – TOTAL																
2009	<div></div>	196.20	817	598	406.06	27	23	214.88	67	52	104.32	6	3	194.20	7	5
2010	<div></div>	188.64	816	399	228.60	27	17	190.20	69	34	148.46	6	1	187.40	10	4
2011	<div></div>	229.94	815	425	244.20	27	17	216.83	70	35	191.63	6	3	170.93	11	5
2012	<div></div>	175.84	813	330	221.55	27	14	197.33	69	33	172.80	6	2	213.68	8	4
2013	<div></div>	190.27	815	712	222.80	27	26	226.20	67	62	199.50	6	6	186.16	115	100

06/24/2014

2013 Key Ratio Trend Analysis (KRTA)

		US Total			State Grouping			Consumer Size			Major Current Power Supplier			Plant Growth (2008–2013)			
Year	System Value	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	Median	NBR	Rank	
RATIO 145 --- AVG. SERVICE AVAILABILITY INDEX (ASAI) – TOTAL (%)																	
2009		99.96	817	219	99.92	27	5	99.96	67	16	99.98	6	4	99.96	7	3	
2010		99.96	816	419	99.96	27	11	99.96	69	36	99.97	6	6	99.96	10	7	
2011		99.96	815	391	99.95	27	11	99.96	70	36	99.96	6	4	99.97	11	7	
2012		99.97	813	484	99.96	27	14	99.96	69	37	99.97	6	5	99.96	8	5	
2013		99.96	815	104	99.96	27	2	99.96	67	6	99.96	6	1	99.96	115	16	