

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

In the Matter of the Joint Application of)
Sunflower Electric Power Corporation,)
and Wheatland Electric Cooperative, Inc., for Approval)
of a Local Access Charge and a 34.5kV Formula-) Docket No. 25-_____
Based Rate.)
)
)

PREFILED DIRECT TESTIMONY OF

JOSHUA DAN

ON BEHALF OF WHEATLAND ELECTRIC COOPERATIVE, INC.

February 5, 2025

1 **Q Please state your name, business address and position.**

2 A. My name is Josh Dan. My business address is 5555 N. Grand Boulevard,
3 Oklahoma City, Oklahoma 73112. I am employed by C.H. Guernsey & Company
4 (“Guernsey”) as a Managing Consultant.

5 **Q. On whose behalf are you testifying in this docket?**

6 A. The Joint Applicants, Sunflower Electric Power Corporation (“Sunflower”) and
7 Wheatland Electric Cooperative, Inc. (“Wheatland”).

8 **Q. Please describe your education and experience.**

9 A. I received my Bachelor’s of Science degree from the University of Central
10 Oklahoma in 2014 as well as my Master of Business Administration in 2018. I am
11 a Certified Public Accountant as of October of 2022. I have 5 years of ratemaking
12 and cost-of-service experience at Guernsey. Previously, I was an accountant at
13 Love’s Travel Stops and Country Stores for 5 years.

14 **Q Have you testified before any electric regulatory authority?**

15 A. Yes. I have testified before the Arkansas Public Service Commission.

16 **Q. Are you sponsoring any exhibits for Wheatland’s request to change its LAC**
17 **rate?**

18 A. Yes, please see Exhibit JED - 1, Exhibit JED - 2, my Curriculum Vitae (“CV”), and
19 for the Formula Based Rate analysis, Exhibits JED - 3, and JED – 4.

20 **Q. Briefly describe the content of your sponsored exhibits that relate to the**
21 **Local Access Charge rate change.**

1 A. Exhibit JED - 1, has a Summary Page and Workbooks A-M, that supports the
2 Local Access Charge (“LAC”) rate change in Wheatland’s local access delivery
3 service (“LADS”) Commission approved tariff, and Exhibit JED - 2 is my CV.

4 **1. REQUEST FOR A CHANGE OF THE LOCAL ACCESS CHARGE RATE.**

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

6 A. The purpose of my testimony is to support the Joint Application for Commission
7 approval of a change in the LAC in Wheatland’s current Eastern Division LADS tariff
8 from \$1.99 per billing demand kW to \$2.95 per billing demand kW, and for Commission
9 Approval of a formula based rate (“FBR”) for Wheatland’s Eastern Division 34.5kV
10 sub-transmission local access delivery system (“LAD System”).

11 **Q. Wheatland is requesting a rate change to the currently filed LADS tariff that was**
12 **approved in the 16-WHLE-305-RTS docket (“16-305 docket”). What role did you**
13 **have in developing its request for the change in the LAC?**

14 A. In the 16-305 docket the Commission authorized two separate LADS tariffs. One
15 approved tariff is for Wheatland’s native facilities in the Garden City, Kansas area, and
16 a second LADS tariff is for its newly acquired facilities in its Eastern Division. I
17 performed a Cost of Service Study (“COS”) on Wheatland 34.5kV sub-transmission
18 facilities in its Eastern Division, that is also referred to as the LAD System facilities.

19 **Q. What are the 34.5kV sub transmission facilities?**

20 A. The 34.5kV sub-transmission facilities are owned, operated, and maintained by
21 Wheatland. Wheatland utilizes its 34.5kV facilities to deliver electricity to retail
22 customers within its certificated service territory (both directly at the 34.5kV and/or
23 through distribution substations that transform the 34.5kV voltage to lower distribution

1 voltages), as well as to wholesale customers receiving service under Wheatland's
2 LADS tariff. Both retail and wholesale LADS customers of Wheatland help pay for its
3 34.5kV LAD System that is made up of the 34.5kV sub-transmission facilities. There
4 are also lower voltage facilities that also serve as local transmission to wholesale
5 customers, but together herein they will all be referred to as the 34.5kV LAD System.
6 The retail customer's load share of the total 34.5kV LAD System costs is embedded
7 in Wheatland's bundled retail base rates; while the wholesale LAD System customers
8 are assessed a LAC, a monthly \$/kW demand rate specified in Wheatland's LADS
9 tariff schedules.

10 **Q. What is the LAC revenue requirement for Wheatland's 34.5 kV system facilities?**

11 A. Wheatland's revenue requirement for the 34.5kV system facilities is \$1,709,535.53
12 based on the 2023 Test Year developed in Exhibit JED - 1, Summary Page.

13 **Q. Is all the \$1,709,535.53 revenue requirement related to providing service to the**
14 **LADS tariff members?**

15 A. No. Wheatland's system is used by both Wheatland's retail customers and LADS tariff
16 wholesale customers. Wheatland has determined that the total 34.5kV revenue
17 requirement is \$1,709,535.53, or \$2.95 per billing kW. Of this total revenue
18 requirement when applied to the LAC billing kW, the LAC share of the total revenue
19 requirement is \$450,319.94. The remainder will be recovered by retail customers.

20 **Q. In developing Wheatland's LAC, did you use inputs based on the FERC Form 1?**

21 A. No. Wheatland is generally excluded from FERC's jurisdiction under the Federal Power
22 Act and is therefore not required to file a FERC Form 1. Wheatland instead files the
23 Cooperative Financial Corporation Financial and Statistical Report commonly referred

1 to as the CFC Form 7. The inputs used were based on the expenses from the test
2 year ending December 31, 2023, provided by Wheatland (see Pre-filed testimony of
3 Traci Goddard). The 2023 data contains source data similar to the FERC Form 1 and
4 is a comparable and appropriate source in developing the LAC and tariff rates. The
5 relevant components are included as part of Exhibit JED - 1.

6 **Q. Please summarize any adjustments made to the test year.**

7 A. Because Wheatland is also seeking approval for a Formula Based Rate (“FBR”) plan,
8 to simplify the process of future rate filings and match commission approved protocol,
9 no normalizing adjustments were made to expenses. This will make the process
10 easier to implement and more accurate as it will always reflect actual historical
11 expenses rather than estimated adjusted values. However, adjustments were made
12 to remove disallowed expenses that cannot be included in the revenue requirement.
13 Please see Exhibit JED - 1, Workbook A, and Workbook B for the list of disallowed
14 expenses and deductions that have been removed from the revenue requirement. The
15 total removed was \$287,777.00 in disallowed expenses and \$40,321.00 in disallowed
16 deductions.

17 **Q. What is included in the disallowed expenses and deductions?**

18 A. The expenses disallowed included expenses related to marketing, board meetings,
19 and promotional items and activities. The deductions excluded were similar in nature.
20 These types of expenses are identified in K.S.A. 66-101f(a).

21 **Q. Please summarize how you developed the LAC for the Wheatland Facilities.**

22 A. The development of Wheatland’s LAC revenue requirement for the facilities involved
23 analysis of the net depreciated plant in service (rate base) of the assets, determination

1 of the annual costs to own, maintain, and operate those facilities, and calculation
2 required to produce the desired Operating Times Interest Earned Ratio (“OTIER”) or
3 Modified Debt Service Coverage (“MDSC”). The process is summarized in the Exhibit
4 JED - 1, Summary Page, which includes the revenue requirement and calculates the
5 34.5kV LADS rates. Further explanation of my Summary Page are as follows:

- 6 1. WP-1 A. Net Plant in Service calculates the rate base. WP-1 B. Operating
7 Expenses calculates the total operating expenses for the Eastern Division of
8 the Wheatland Electric system as well as the expenses directly assigned to
9 the 34.5kV assets. WP-1 C. calculates the total payroll for the Eastern Division
10 of the Wheatland system as well as the total payroll assigned directly to the
11 34.5 kV assets. WP - 1 D. calculates the inputs for the OTIER and MDSC
12 calculations for margin requirements.
- 13 2. WP - 2 contains the summary of adjustments made to the test year expenses.
- 14 3. WP - 3 calculates the allocation factors used for expenses, payroll, and plant
15 that are shown on the Summary Page.
- 16 4. WP - 4 calculates the allocation factor for the OTIER and MDSC margin
17 requirement.
- 18 5. WP - 5 displays the Billing Coincident Peaks (“CP”) by delivery point for the
19 2023 test year.
- 20 6. WP - 6 summarizes the disallowed expenses by account.

21 The supporting Workbooks for each workpaper are identified in the index provided
22 with Exhibit JED - 1.

1 **Q. How were the monthly 34.5kV delivery rates for firm point-to-point service**
2 **calculated?**

3 A. The 34.5 kV rates are determined by dividing the 34.5 kV revenue requirement by the
4 total CP billing demand from the 2023 Sunflower Billing Determinants (WP - 5). As
5 displayed in the Exhibit JED - 1, Summary Page, the \$1,709,535.53 divided by the
6 total 580,165 billing kW (adjusted for losses) equals \$2.95 per billing kW.

7 For purposes of the rate design, the individual LAC wholesale customer Monthly
8 Billing Demand shall be defined as the customer's kW contribution to the monthly LAD
9 System peak.

10 **Q. Please discuss how Wheatland's costs were allocated.**

11 A. Wheatland is able to directly assign expenses and payroll related to the operation and
12 maintenance of the 34.5 kV LAD System assets. For that reason, only expenses
13 directly assigned have been allocated for all operations and maintenance accounts.
14 While there are distribution system assets dedicated to serve the LAD System, there
15 were no assigned expenses related to operating and maintaining those distribution
16 assets in the test year, outside of what was included in transmission expense. This
17 extends to accounting, billing, and records, and other administrative and general
18 expenses – no expenses were directly assigned to the 34.5 kV system in those
19 categories. Because there were no historical expenses assigned to the 34.5 kV
20 system, but we are allocating other expenses (depreciation, interest, etc.), the
21 structure of the CFC Form 7 was kept and thus an allocation factor was derived and
22 shown even though it is 0.00000. In future filings, the allocation factor will represent

1 the 34.5 kV directly assigned expenses as a total of the relevant Form 7 expense
2 category.

3 For Depreciation, Interest, Property Tax – the expenses from the total Eastern Division
4 LAD System have been allocated based on the 34.5 kV's percentage of the total net
5 plant. This will be discussed in greater detail below.

6 **Q. Please identify the data sources supporting the Wheatland expenses included**
7 **in the LAC.**

8 A. Data was provided by Wheatland. Please see Pre-filed testimony from Traci Goddard.

9 **Q. Please discuss how the depreciation, property tax, and interest expenses were**
10 **allocated.**

11 A. These expenses were allocated based on the 34.5 kV share of total system rate base.

12 This was determined by calculating the relationship between the net transmission and
13 distribution assets utilized to serve the LAD System and the total net plant for
14 Wheatland's Eastern Division electric system. The transmission and distribution
15 assets for the LAD System are directly assigned and kept separate in Wheatland's
16 accounting software. A share of the general plant was allocated to the LAD System
17 as well based on the percentage of the total payroll the LAD System represented. This
18 is derived in WP - 3. The total of the assigned transmission, distribution, and allocated
19 general plant is the Total LAD System Plant in Service. From there, the accumulated
20 depreciation is removed to arrive at the Net Plant Used in the LAD System. The same
21 process is repeated for the total Wheatland Eastern Division Electric plant – starting
22 with total plant in service and removing accumulated depreciation. The relationship

1 between the LAD System Net Plant and the Total System Net Plant is then used to
2 allocate the depreciation expense.

3 **Q. Please discuss the Workbooks and papers provided.**

4 A. WP 1 - 6 contains the calculations used to derive the return and rate for the LAC. Those
5 calculations utilize data provided by Wheatland. That data is sourced from Exhibit
6 JED - 1, Workbooks A-M. Some calculations or WPs use data from multiple different
7 workbooks.

8 **Q. Are the allocation factors used in Exhibit 1 referenced?**

9 A. Yes. Allocation factors were derived on WP - 3 and referenced on Exhibit JED - 1,
10 Summary Page.

11 **Q. Describe how the allocation factors were developed.**

12 A. On Exhibit JED - 1, Summary Page, allocation factors DOM1-DOM7 were derived by
13 taking the relationship between the directly assigned 34.5 kV expenses and the total
14 Wheatland Eastern Division expense. For example, the directly assigned Distribution
15 Expense – Operation that was directly assigned, \$0, is divided by the system total of
16 \$798,355.65. Because there were no distribution operations and maintenance
17 expenses assigned for the test year, all DOM2 – DOM7 allocation factors are currently
18 zero. However, in future filings, this methodology will be used to reflect the direct
19 allocation of expenses when those occur. The allocation factor, cited as “NP” in the
20 Summary Page, was determined by calculating the net plant for the LAD System and
21 the net plant for the entire Wheatland Eastern Division, with the allocation factor being
22 the relationship between those two. Again, because Wheatland has isolated the 34.5

1 kV LAD System in its plant records, the net plant for the LAD System is simply
2 calculated by removing the assigned accumulated depreciation.

3 The calculations to derive the above allocation factors are included in Exhibit JED - 1
4 WP-3.

5 **Q. Please go into further detail on the Net Plant allocation.**

6 A. Wheatland tracks accumulated depreciation only at the total asset level general ledger
7 account level for outside plant, making the specific accumulated depreciation for the
8 34.5 kV LAD System assets unavailable. During an accounting software conversion,
9 when these assets were entered into the system, any accumulated depreciation was
10 distributed across all Wheatland Eastern Division existing assets. These assets are
11 assumed to have a 30-year useful life based on the relevant plant accounts. To
12 estimate accumulated depreciation for the net plant allocation, annual straight-line
13 depreciation for a 30-year life was applied to the 14 years the assets have been in
14 service. This results in total accumulated depreciation for the 34.5 kV distribution
15 assets of \$7,872,867. A wage allocation factor was used to calculate the general plant
16 in service as well as the associated accumulated depreciation and then allocated to
17 the LAD System.

18 **Q. Please discuss the calculation of Wheatland's return component.**

19 A. The interest on long term debt can be found on the Exhibit JED - 1, Summary Page as
20 well as Workbook G. Wheatland's retail rates were designed to produce an OTIER of
21 1.75 from their electric members. Wheatland is committed to asking no more or no
22 less from its LAC customers. Wheatland's interest expense is allocated based on the

1 net plant (NP) allocation factor. The return component is calculated by taking the
2 allocated interest expense and multiplying it by the desired OTIER of 1.75.

3 **Q. Were any adjustments made to interest expense?**

4 A. No. Interest expense, like other expenses in this filing, were kept at the test year value
5 and not adjusted to reflect new or extinguished debt.

6 **Q. Do you believe that the LAC rate for the facilities involved in this proceeding is
7 just and reasonable?**

8 A. Yes.

9 **Q. Do you believe that the approval by the Commission of Wheatland's requested
10 LAC rate is in the public interest?**

11 A. Yes. Rates based upon the cost of providing service are in the public interest because
12 they remove subsidies, are fair and non-discriminatory, and result in sound financial
13 practice. It is in the public interest for Wheatland to be financially sound to permit it to
14 maintain its system and to continue to provide excellent service to its customers.
15 Providing the LADS is in the public interest because the regional public is spared the
16 expense of constructing and maintaining duplicate facilities.

17 **Q. Does this rate permit Wheatland to meet its financial obligations?**

18 A. Yes. While Wheatland's retail cost of service study is beyond the scope of this
19 proceeding, Wheatland determined as part of its retail rate and cost of service study
20 that it required a given total rate increase to permit it to operate its system. Wheatland
21 is not an investor-owned utility and thus its financial requirement is not related to the
22 rate of return on rate base or other similar objectives. As a not-for-profit electric
23 cooperative, it must obtain financing from lenders or from member-owners and those

1 non-members who use its electric system - there are no investors. The system rate
2 increase discussed above resulted in a fall-out system-wide OTIER of 1.75.
3 Wheatland is requesting, as discussed in detail above, the identical 1.75 OTIER from
4 its LAC customers.

5 **Q. Is the proposed LAC rate fair and reasonable and not unjustly discriminatory or**
6 **unduly preferential?**

7 A. Yes. The entire intent of the rate design process was to develop rates for the LAC
8 customers that would be fair and reasonable to all parties and not be unjustly
9 discriminatory or unduly preferential to any parties. Wheatland based the amount of
10 the revenue requirement for LAC customers on the same OTIER as its recent over-all
11 retail system rate change produces. Wheatland has eliminated the difference in rate
12 structure for ALL customers, both retail and LAC as part of its rate change, to reflect
13 that it is now treated as one unified system. Wheatland's management and board
14 instructed its rate consultants that they desired all retail and LAC rates to be fair and
15 equitable and this was done. Wheatland values all of its customers, including its LAC
16 customers, and has worked hard to provide proposed rates based on cost causation
17 and a system-wide coverage ratio. At the same time, it must recover its cost of
18 providing service to these customers.

19 **2. REQUEST FOR A FORMULA BASED RATE**

20 **Q Please discuss how Wheatland would handle future changes to its LADS tariff's**
21 **LAC rate?**

22 A. Wheatland will also be seeking approval for a Formula Based Rate ("FBR") for future
23 rate filings.

1 **Q. Wheatland is also requesting an FBR for annual adjustments to its Eastern**
2 **Division LAC. What role if any did you play in that process?**

3 A. By reviewing other approved FBR Commission dockets, I developed protocols for
4 annually updating the LAC in Wheatland's Eastern Division LADS tariff. See, Docket
5 Numbers 16-MKEE-023-TAR ("16-023 docket") and modified in 21-SEPE-049-TAR
6 ("21-049 docket").

7 **Q. Are you sponsoring any exhibits for Wheatland's request for an FBR?**

8 A. Yes, I am sponsoring Exhibits JED - 3, and JED - 4.

9 **Q. Will the requested 34.5kV FBR affect both the retail rates and the wholesale LAD**
10 **System customers' LAC for Wheatland?**

11 A. No. Again, as detailed in the Joint Application in the instant docket, Wheatland chose
12 to self-regulate from the Commission's jurisdiction pursuant to K.S.A. 66-104d, only
13 Wheatland's LAC rates will be directly affected by its 34.5kV FBR.¹ It is possible that
14 Wheatland as a deregulated cooperative will use the results of its 34.5kV FBR to
15 update their respective retail rates synchronously with the LAC rate update; however,
16 a decision to do so will be at the discretion of Wheatland's member-elected Boards of
17 Trustees and usually not subject to the actions of the Commission. Nevertheless, this
18 should not be interpreted as the potential for inequality in the treatment of Wheatland's
19 wholesale LADS customers vs. retail members/customers: the 34.5kV FBR calculates

¹ K.S.A. 66-104d releases the deregulated cooperative from the Commission jurisdiction over the cooperative's 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 the resultant LAC rate using the full revenue requirement associated with Wheatland's
2 Eastern Division 34.5kV facilities and the total (i.e., wholesale and retail) billing
3 demand on the 34.5kV LAD System, thus ensuring the wholesale LADS tariff
4 customers will pay only their equitable share.

5 **Q. Explain what is being requested?**

6 A. The request is merely for the approval of the Eastern Division's LADS tariff 34.5kV
7 FBR mechanism as reflected in the formula templates and Protocols (included as
8 exhibits to my testimony), which will be used in the future determination of the
9 corresponding rates for Wheatland. It should also be noted any such potential future
10 rate change resulting from the annual update of the 34.5kV FBR for Wheatland would
11 remain subject to the review and approval of the Commission. It is expected that the
12 first Annual Update filing by Wheatland utilizing the 34.5kV FBR (i.e. "Annual Update")
13 would occur in 2026.

14 **Q. What is the Joint Applicants' objective in requesting this 34.5kV FBR**
15 **mechanism?**

16 A. As mentioned previously, the LAC rate that Wheatland charges for service provided
17 to the Eastern Division wholesale LAD System customers over its 34.5kV sub-
18 transmission facilities remain under the Commission jurisdiction regardless of its
19 deregulated status under K.S.A. 66-104d. Therefore, Wheatland is still required to
20 continue to formally file with the Commission a request for adjustments to its LADS
21 tariff's LAC as needed. Accordingly, the Joint Applicants believe there is a need to
22 implement a regulatory approach for Wheatland that will allow for a time-efficient and
23 cost-effective application review process while assuring reasonable rates are

1 reflective of the cost of providing service over the Eastern Division 34.5kV LAD
2 System facilities. The requested 34.5kV FBR mechanism provides the framework for
3 achieving this objective, which the Joint Applicants believe to be in the best interest of
4 Wheatland's customers.

5 **Q. Are you sponsoring any exhibits for Wheatland's request for an FBR?**

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

7 Exhibit JED - 3 Wheatland 34.5kV FBR Template – Blank

8 Exhibit JED - 4 Wheatland 34.5kV FBR Protocols

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

10 A. Yes.

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

12 A. The requested 34.5kV FBR mechanism is a formulaic approach used for establishing
13 rates for service over Wheatland's Eastern Division 34.5kV sub-transmission facilities
14 on an annual basis. The general steps are as follows: first, Wheatland's revenue
15 requirement associated with the costs of owning, operating, and maintaining the
16 34.5kV Eastern Division facilities is determined; next, the revenue requirement is
17 divided by the 34.5kV total billing units to produce an Eastern Division system-wide
18 (meaning common for wholesale and retail) per unit LAC rate. Each year, Wheatland
19 will perform the prescribed calculations within its 34.5kV FBR and file its Annual
20 Updates with the Commission.

21 **Q. Please summarize the Protocols accompanying the Annual Update filing being**
22 **requested as part of the Joint Application for the approval of the 34.5kV FBR.**

1 A. The Protocols accompanying Wheatland's 34.5kV FBRs lay out the procedure,
2 timeframe, and calculations to be followed during the Annual Update filings. The
3 complete versions of the 34.5kV FBR Protocols for Wheatland is attached to my
4 testimony as Exhibits JED - 3, and JED - 4.

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

8 A. Yes, I do. It is a similar procedural schedule to that which was approved by this
9 Commission in Dockets 16-023 and 21-049. I would also note that the 34.5kV FBR
10 Protocols also contain a list of required information to be included in each annual filing,
11 as well as a detailed explanation of the data inputs and calculation algorithms, all of
12 which will assist Staff, Interveners, and the Commission with their audit of these
13 Annual Updates.

14 **Q. Please summarize how the rates for providing the service over Wheatland's**
15 **34.5kV sub-transmission facilities are currently regulated.**

16 A. To recap, Wheatland uses its corresponding 34.5kV sub-transmission facilities, the
17 LAD System, to deliver electricity to wholesale LADS tariff customers, as well as to its
18 retail customers. As pointed out earlier, under the current regulatory approach, the
19 LAC rate, which recovers the cost of providing 34.5kV service to wholesale LADS
20 customers, remains Commission-jurisdictional. So, if the cost of providing service over
21 its 34.5kV facilities changes, in order to adjust rates accordingly, Wheatland would
22 need to file a rate application with the Commission to align those rates with the COS.

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

3 A. Yes. Wheatland owns, operates, and maintains distribution facilities and 34.5kV sub-
4 transmission facilities, both of which are used in the delivery of electricity to its
5 customers. The distribution facilities are those typically used for the delivery of
6 electricity from the higher voltage transmission system to the end-users of the
7 electricity (retail customers). The 34.5kV sub-transmission system is comprised of
8 what may be termed sub-transmission facilities, where these facilities are used to
9 deliver electricity from the higher voltage transmission system (1) directly to wholesale
10 LAD System customers who are not end-users; or (2) directly to Wheatland's
11 respective retail customers served directly off 34.5kV voltage; or (3) to a distribution
12 substation, which then transforms the power to a lower distribution voltage for delivery
13 to its respective retail customers.² The direct investments and expenses involved in
14 owning, operating, and maintaining these 34.5kV sub-transmission facilities are
15 recorded separately in Wheatland's respective accounting system in accordance with
16 the Rural Utilities Service ("RUS") Uniform System of Accounts. Although it was
17 determined these 34.5kV facilities do not meet the qualifications of the "transmission
18 facilities" per Attachment AI to the Southwest Power Pool, Inc.'s ("SPP") Open Access
19 Transmission Tariff, the 34.5 kV sub-transmission facilities that provide service to one
20 or more wholesale LADS tariff customers were agreed to be providing local

² 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.

1 “transmission service” under Kansas law.³ It is important to note that Wheatland is not
2 a member of the SPP like Sunflower Electric Power Corporation. Accordingly,
3 Wheatland utilizes the transmission plant and operation and maintenance (“O&M”)
4 accounts for their 34.5kV sub-transmission facilities. The table below shows the
5 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 |

12 It is important to note however, that aside from the direct cost of providing distribution
13 or 34.5kV wholesale service, Wheatland incurs substantial “common” costs that must
14 be allocated in rates. For example, general plant, such as the headquarters building,
15 is not solely related to either distribution or 34.5kV wholesale service, as it is used to
16 support both. Similarly, administrative and general expenses are incurred to support
17 all the functions of Wheatland. These common costs are part of what it takes to provide
18 both distribution and 34.5kV sub-transmission service, and so they must be shared
19 and become part of the rates for both types of service. service. The requested 34.5kV
20 FBR mechanism assigns and allocates costs attributable to the 34.5kV sub-

³ 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 transmission facilities to reflect the cost of providing service over its 34.5kV sub-
2 transmission facilities.

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

6 A. No, there are no material differences between the two methodologies.

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

9 A. No. I am unaware of any occasion in which Staff, an intervener, or the Commission
10 rejected the use of the LAC COS in whole or even in part. In my opinion, this approach
11 for establishing the cost of providing service over Wheatland's 34.5kV sub-
12 transmission facilities has been sufficiently affirmed by the various stakeholders and
13 the Commission.

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

17 A. The request is not intended to improve or "fix" any methodological problems in how
18 the LAC rate is set, but rather to address the regulatory process itself and,
19 specifically, to implement an approach based on a formula, i.e., incorporating more
20 frequent filings based on a predetermined procedure. The benefits of FBR
21 regulation include reduced regulatory costs and lag. In my opinion, the fact that
22 Wheatland still remains regulated for purposes of the LAC but not the retail rates
23 present a very unique challenge, one that is different than if the LAC and retail rates

1 still remained jointly regulated as part of overall rates. With the ability to set retail
2 rates by board approval, Wheatland retains more flexibility in the retail rate setting
3 process. Those retail rates can be updated on a more frequent basis without the
4 costs of a full rate case. However, they do not retain that same flexibility for their
5 LADS tariff. The corresponding 34.5kV FBRs remedy the problem by utilizing an
6 approach that is more efficient for a self-regulated Wheatland with respect to its
7 LAC and its customers while still preserving the Commission's regulatory authority
8 over the rates for services over the 34.5kV LAD System facilities. In addition, it
9 provides a mechanism that minimizes the costs of setting the LAC, bringing the
10 costs of setting both the retail rate and wholesale LAC more in sync.

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

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

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

1 In contrast, since the 34.5kV FBR templates and protocols would be predetermined,
2 the process should require very little consulting, legal, or even Staff costs. In
3 addition, it should require less internal resources for the same reasons. And
4 because historical actual costs would be used for inputs, there is reduced need for
5 analysis in determining adjusted, forward-looking expenses. I would anticipate that
6 under the requested 34.5kV FBR, Wheatland staff could complete the audit of the
7 formula calculation and would engage consulting and legal assistance only for
8 review and or document/filing preparation purposes. The requested FBR uses
9 commonly used historical financials and includes very few adjustments so that the
10 audit by Commission Staff and interveners would be much less burdensome and
11 costly. Related, the need for discovery would be reduced given the 34.5kV FBR
12 Protocols and Wheatland's 34.5kV FBR Exhibits JED - 3 and JED - 4 specify the
13 information needed to verify the population of the formula template.

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

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

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

20 **Q. Have you included a Template and Protocols for the requested 34.5kV FBR**
21 **mechanism?**

22 A. Yes. I have included a sample template, showing the assessment/calculation that
23 would be made and filed by Wheatland annually, beginning in 2026, and the Protocols

1 governing Wheatland's 34.5kV FBR. In fact, a populated "template" is used as Exhibit
2 JED - 1, using 2023 data. A Blank formula template for Wheatland is provided in
3 Exhibit JED - 3.

4 **Q. Why do the populated templates you included use 2023 data - was 2024 data not**
5 **available?**

6 A. I used 2023 data because when we began developing the FBR mechanism for
7 Wheatland, this was the most recently available data. The populated template reflects
8 the 2023 test year data used in the application for the LAC rate change.

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

11 A. By May 1 of each year, Wheatland will complete its formula worksheet template, as
12 provided in Exhibits JED - 3 and JED - 4, and make an Annual Update filing with the
13 Commission. The templates will be populated by Wheatland using its historical
14 financial, operating, and billing data from the year-end Statement of Operations, Trial
15 Balance, and Payroll Journal. The formula utilized in Wheatland's corresponding
16 34.5kV FBR, based upon the input and work papers, produces the total 34.5kV system
17 revenue requirement. The revenue requirement is then divided by the respective
18 annual billing units (both retail and wholesale billing demand on the 34.5 kV system)
19 to produce an Eastern Division system-wide rate (meaning common for wholesale and
20 retail) for 34.5kV service. This becomes the LAC - the per unit demand rate charged
21 to wholesale LAD system customers directly.

22 Therefore, the major components of the calculation (shown in more detail in
23 Exhibits JED - 3 and JED - 4), are as follows:

- 1 A. Determination of the Revenue Requirements;
2 B. Utilizing the 34.5 kV Billing Determinants; and
3 C. Calculation of the resultant LAC rate.

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

- 5 A. Yes. Specifically, recognition of adjustments to the operating expenses performed per
6 Commission-adopted policy for excluding dues and donations.

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

- 9 A. In accordance with policy adopted per K.S.A. 66-101f(a), the Commission historically
10 approved certain Staff-recommended adjustments related to the treatment of
11 expenses for corporate advertising and dues, donations, and charitable contributions.
12 Typically, such adjustments affect Wheatland's Administrative and General and/or
13 Other Deductions expense categories.⁴ Accordingly, Wheatland's 34.5kV FBR
14 templates include such adjustments (see Exhibit JED - 1, Summary Pag Line 10 and
15 Line 23e (also, Exhibit JED - 1, WP-2)).⁵ Each year, at the time of the annual 34.5kV
16 FBR update filing, Wheatland will perform these adjustments to be included in the
17 Revenue Requirement calculation and applied as a reduction to the associated
18 expenses by following the guidelines included in the Protocols (which are based on
19 K.S.A. 66-101f(a) and prior docket history). Additionally, Wheatland will supply

⁴ If any lower voltage distribution facilities are used for service to LADS wholesale customers, an appropriate portion of Distribution O&M is allocated to the 34.5kV FBR, as specified in each of the Member's 34.5kV FBR Protocols.

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

1 sufficient detailed information necessary for the Commission Staff and interveners to
2 audit the corresponding adjustments.

3 **Q. How will Property Taxes be addressed in the FBR?**

4 A. Wheatland has a Board of Trustee-approved Property Tax Adjustment (“PTA”) rider
5 in place that is applicable to retail customers. Because we directly assign property tax
6 to the LAD System assets, to avoid over-recovery through the PTA rider/factor, the
7 allocated property tax will be removed from the retail PTA calculation. This new
8 method of calculating the retail PTA will be effective upon board approval of the retail
9 rate 25-PTA. The retail rate change of 25 - PTA is scheduled for an open meeting of
10 the retail members is February 25, 2025.

11 **Q. Is this method fair and equitable to both retail and wholesale customers utilizing**
12 **the LADS system?**

13 A. Yes. Using this methodology allows the direct assignment of property tax to the plant
14 utilized by the LADS. Their allocated share of property tax is built into the per billing
15 kW demand rate set for each year. The remainder property tax is recovered by the
16 PTA and retail rates. This allows for wholesale LADS customers to recover their
17 assigned property tax expenses and the retail members to recover the remainder
18 system property tax expenses.

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

21 A. Accounting costs as recorded on Wheatland’s books will be used in the analysis.
22 Specifically, the calculation will be based upon the audited December Statement of
23 Operations, Trial Balance, and Payroll Journal for the prior year, and any other

1 supplemental schedules as necessary to facilitate the Staff's and interveners' review
2 and audit of the 34.5kV FBR.

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

5 A. No. The only adjustments will be made to remove the disallowed expenses and
6 deductions previously referenced. All other expenses will represent historical, actual
7 values.

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

11 A. Wheatland's return requirement will be based upon either an Operating Times Interest
12 Earned Ratio ("OTIER") or Modified Debt Service Coverage ("MDSC") ratio. Both the
13 OTIER and MDSC are measures of an organization's ability to pay its debt
14 obligations.

15 **Q. Please explain the OTIER and MDSC ratios.**

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

20 **Q. For purposes of Wheatland's 34.5kV FBR, what level of margin are you**
21 **recommending?**

22 A. I am recommending the following ratios be used:

23

Table 1

| Member | Ratio | Minimum Required | Recommended Level |
|---------------|--------------|-------------------------|--------------------------|
| Wheatland | OTIER/MDSC | 1.10/1.35 | 1.75 |

Q. Why are you recommending both an OTIER and MDSC be used in the FBR template for Wheatland?

A. This is for a few reasons. Wheatland borrows exclusively from National Rural Utilities Cooperative Finance Corporation (“CFC”) which has a 1.35 MDSC minimum requirement. Additionally, the most recent retail cost of service and rate subsequent rate change produced an OTIER of 1.75. Therefore, using both OTIER and MDSC will ensure that Wheatland will have rates that meet mortgage covenants as well as provide the same OTIER as the remainder electric system. It is possible based upon debt maturity, amortization schedules and plant investments that Wheatland’s margins could switch from being OTIER driven to MDSC driven or vice versa. Including both in the FBR template simply provides for a more robust and sustainable mechanism going forward.

Q. Is it necessary for Wheatland to operate at a financial ratio above the minimum required by its lender?

A. Yes. As stated, the minimums are just that; they are minimums and should not be viewed as targets or optimal levels. It is necessary to build in some “buffer” above these minimums to deal with contingencies such as variability in sales and unexpected costs. If this is not included, a cool summer may be all it takes to drop margins below the minimum requirement. Ultimately, this buffer will facilitate improvement of capital structure (i.e., equity ratio) to meet the standards of its lender, stabilize its financial

1 condition and ensure that the rates for this service are equitably contributing to the
 2 financial success of Wheatland rather than being subsidized by the other retail rates.

3 **Q. Is it common for cooperatives in Kansas and in the United States to operate at**
 4 **financial ratios that exceed the minimum required by lenders?**

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

| Table 2 Summary of OTIER (2019-2023 Median Values) <i>Source: CFC Key Ratio Trend Analysis</i> | | |
|--|-----------------|---------------|
| Year | National | Kansas |
| 2019 | 2.03 | 1.72 |
| 2020 | 2.24 | 1.75 |
| 2021 | 2.17 | 1.94 |
| 2022 | 2.1 | 2.22 |
| 2023 | 1.90 | 1.88 |
| Ave. | 2.08 | 1.90 |

8 As can be seen in the above table, the median OTIER in Kansas has recently
 9 ranged from 1.1.72 to 2.22, with an average of 1.90. Based on the above information,
 10 the cushion for electric cooperatives in Kansas is about 0.80 (1.90 - 1.1). The cushion
 11 embedded in the 1.75 target recommended for the 34.5 kV FBR is slightly less at 0.65.

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

14

| Table 3 | | |
|------------------------------------|-----------------|---------------|
| Summary of Modified DSC | | |
| (2019-2023 Median Values) | | |
| Source: CFC Key Ratio Trend | | |
| Analysis | | |
| Year | National | Kansas |
| 2019 | 1.91 | 1.70 |
| 2020 | 1.96 | 1.60 |
| 2021 | 1.95 | 1.63 |
| 2022 | 1.87 | 1.9 |
| 2023 | 1.89 | 1.74 |
| Ave. | 1.92 | 1.71 |

1

2 As can be seen in the above table, the median MDSC in Kansas has recently
3 ranged from 1.60 to 1.90, with an average of 1.71. It should be noted that both CoBank
4 and CFC typically require borrowers to achieve a 1.35 MDSC ratio, though the specific
5 formulas can vary slightly. Based on the above information, the MDSC cushion for
6 electric cooperatives in Kansas is about 0.36 (1.70 - 1.35). The cushion embedded in
7 the MDSC target for the requested 34.5kV FBR is similar at 0.40 (1.75-1.35)

8 In both the OTIER and MDSC cases, my recommended margin levels are near or
9 below both the 2023 results and the five-year average of electric cooperatives in
10 Kansas and the country as reported in the CFC Key Ratio Trend Analysis.

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

1 **Q. You mentioned that targeting a coverage ratio in excess of the minimum loan**
2 **covenant will help improve the capital structure of Wheatland. Can you please**
3 **summarize Wheatland's capital structure?**

4 A. Using 2023 year-end financial statements, Wheatland's equity ratio as a percent of
5 total capitalization is 45%. This has been prepared using the margins and equities as
6 stated on the balance sheet. It is also informative to look at the equity without the
7 investment in Sunflower as the remainder represents the equity generated by the
8 operations of Wheatland . Although it may accumulate an equity share in Sunflower,
9 such equity and margins are generated by Sunflower's wholesale rates and may not
10 be available as cash. The capitalization excluding Sunflower equity is 23%.

11 **B. RATE DESIGN**

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

15 A. The final step in the formula is to calculate the rate for 34.5kV service by dividing the
16 34.5kV revenue requirement by the 34.5kV billing determinants. In this case, the
17 revenue requirement is determined by the formula as previously explained. The billing
18 determinants equal the billing demand which is defined in Wheatland's LAC rate
19 schedule. The result is a 34.5kV Eastern Division system-wide (meaning common for
20 wholesale and retail) \$/kW demand rate. In other words, the rate includes the total
21 34.5kV Eastern Division system costs and total 34.5kV system billing determinant

1 such that the resulting rate would be appropriate for all customers, whether wholesale
2 or retail.⁶

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

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

12 **Q. Should the Commission be concerned then that the requested FBR**
13 **mechanism does not require the adjustment of retail rates?**

14 A. No. This is the current regulatory status concerning retail versus wholesale rates
15 regardless of whether or not the Commission approves the requested 34.5kV FBR
16 mechanism or not; and the Joint Application does not introduce any subsidization
17 concern. For Wheatland, the Commission has authority over the LAC rate for
18 wholesale LADS customers, and so the primary purpose of its 34.5kV FBR should be
19 to ensure that the LAC rate is set appropriately for those customers. Overall, the

⁶ Although, as explained earlier in my testimony, the retail customers are not billed this resultant \$/kW demand rate explicitly as the wholesale LADS customers; instead, the retail component/share of the 34.5kV costs is 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.

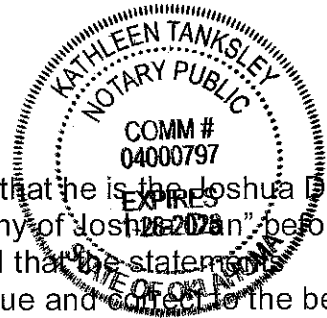
1 34.5kV FBR mechanism being requested makes no change to the scope of the
2 Commission's authority to regulate rates for Wheatland.

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


4 A. Yes, it does.

VERIFICATION OF JOSHUA DAN

STATE OF OK)
) ss:
COUNTY OF OK)



Joshua Dan, being first duly sworn, deposes and says that he is the Joshua Dan referred to in the foregoing document entitled "Direct Testimony of Joshua Dan" before the State Corporation Commission of the State of Kansas and that the statements therein were prepared by him or under his direction and are true and correct to the best of his information, knowledge, and belief.



Joshua Dan

SUBSCRIBED AND SWORN to before me this 4th day of February, 2025.



Notary Public

My Appointment Expires: #04000797 1-28-25

Exhibit JED-1 & JED-3

Wheatland Electric Cooperative, Inc.
34.5 kV LAC – Exhibits JED 1 & 3 Index
Test Year Ending December 31, 2023

| | |
|--------------|---|
| Summary Page | Summary of adjustments and allocation factors applied to test year expenses |
| WP1 | Plant and expenses by account and margin requirements – including direct assignment of 34.5 kV Plant, Expenses, and Payroll |
| WP2 | Adjustments to test year expenses – removal of disallowed expenses and deductions from test year |
| WP3 | Development of allocation factors for expenses, plant, and payroll |
| WP4 | Development of OTIER and MDSC margin requirement for revenue requirement |
| WP5 | Determination of LAC billing demands |
| WP6 | Determination of disallowed expenses |
| Workbook A | List of Disallowed Expenses |
| Workbook B | List of Disallowed Deductions |
| Workbook C | Calculation of Cash Received from G&T and Lenders |
| Workbook D | Directly Assigned 34.5 kV Expenses by Account |
| Workbook E | Directly Assigned 34.5 kV Payroll by Account |
| Workbook F | Total Eastern Division Payroll and Overhead |
| Workbook G | 2023 East Division Form 7 |
| Workbook H | Directly Assigned 34.5 kV Plant Assets |
| Workbook I | Trial Balance Plant Accounts – East Division |
| Workbook J | Trial Balance Accumulated Depreciation - East Division |
| Workbook K | Directly Assigned 34.5 kV Accumulated Depreciation |
| Workbook L | Trial Balance Depreciation Expense - East Division |
| Workbook M | Principal Payment– Eastern Division |

Exhibit JED - 1

Revenue Requirement and Rate Calculation

| (a) Line No | (b) Description | (c) Source | (d) Unadjusted Historical Test Year [2023] | No. | Exhibit JED - 1 | | (f) Adjusted Historical Test Year [2023] | (g) (h) Allocation Factor | | (i) FBR Revenue Requirement |
|----------------|--|-------------------------|--|-----|------------------------------|--|--|------------------------------|-------------|-----------------------------------|
| | | | | | (e) Adjustments Amount | (f) Adjusted Historical Test Year [2023] | | Name | Factor | |
| | | | | | | Source: WP2 | | | Source: WP3 | |
| 1 | Operating Expenses | | | | | | | | | |
| 2 | Power Production Expense | WP1, L35, Col (d \$ | - | | | \$ - | | 0.000000 | | \$ - |
| 3 | Cost of Purchased Power | WP1, L36, Col (d \$ | 16,185,587.79 | | | \$ 16,185,587.79 | | 0.000000 | | \$ - |
| 4 | Transmission O&M | WP1, L37, Col (d \$ | 123,739.42 | | | \$ 123,739.42 | DOM1 | 1.000000 | | \$ 123,739.42 |
| 5 | Distribution Expense-Operation | WP1, L38, Col (d \$ | 798,355.65 | | | \$ 798,355.65 | DOM2 | 0.000000 | | \$ - |
| 6 | Distribution Expense-Maintenance | WP1, L39, Col (d \$ | 1,365,090.12 | | | \$ 1,365,090.12 | DOM3 | 0.000000 | | \$ - |
| 7 | Consumer Accounts Expense | WP1, L40, Col (d \$ | 538,942.50 | | | \$ 538,942.50 | DOM4 | 0.000000 | | \$ - |
| 8 | Customer Service and Informational Expense | WP1, L41, Col (d \$ | 84,454.66 | | | \$ 84,454.66 | DOM5 | 0.000000 | | \$ - |
| 9 | Sales Expense | WP1, L42, Col (d \$ | 125,661.35 | | | \$ 125,661.35 | DOM6 | 0.000000 | | \$ - |
| 10 | Administration & General | WP1, L43, Col (d \$ | 3,023,244.36 | [1] | \$ (287,776.65) | \$ 2,735,467.71 | DOM7 | 0.000000 | | \$ - |
| 11 | Total O&M Expense | Sum (L2:L10) | | | | \$ - | | | | \$ 123,739.42 |
| 12 | Depreciation and Amortization | WP1, L44, Col (d \$ | 4,189,021.75 | | | \$ 4,189,021.75 | NP | 0.142859 | | \$ 598,437.93 |
| 13 | Property Tax | WP1, L49, Col (d \$ | 1,053,957.03 | | | \$ 1,053,957.03 | NP | 0.142859 | | \$ 150,566.86 |
| 14 | Other Taxes | WP1, L50, Col (d \$ | 625.32 | | | \$ 625.32 | NP | 0.142859 | | \$ 89.33 |
| 15 | L.T. Interest | WP1, L51, Col (d \$ | 2,863,944.86 | | | \$ 2,863,944.86 | NP | 0.142859 | | \$ 409,139.25 |
| 16 | Interest Charged to Construction - Credit | WP1, L52, Col (d \$ | - | | | \$ - | NP | 0.142859 | | \$ - |
| 17 | Interest-Other | WP1, L53, Col (d \$ | 476,947.09 | | | \$ 476,947.09 | NP | 0.142859 | | \$ 68,136.01 |
| 18 | Other Deductions | WP1, L54, Col (d \$ | 40,321.20 | [2] | \$ (40,321.20) | \$ - | NP | 0.142859 | | \$ - |
| 19 | Total Cost of Electric Service | | | | | | | | | \$ 1,350,108.81 |
| 20 | | | | | | | | | | |
| 21 | Margin Requirement | | | | | | | | | |
| 22 | Principal Payments | WP1, L68, Col (d \$ | 2,681,957.52 | | | \$ 2,681,957.52 | NP | 0.142859 | | \$ 383,140.79 |
| 23 | L.T. Interest | L15 \$ | 2,863,944.86 | | | \$ 2,863,944.86 | NP | 0.142859 | | \$ 409,139.25 |
| 24 | Subtotal | SUM(L22:23) | | | | | | | | \$ 792,280.04 |
| 25 | Required Coverage Ratio | WP1, L70, Col (d) | | | | | | | 1.75 | 1.75 |
| 26 | Gross Margin Requirements | L24 x L25 | | | | | | | | \$ 715,993.69 \$ 1,386,490.08 |
| 27 | Less: Offsets to margin Requirements | WP4, L4 or L11, Col (i) | | | | | | | | \$ 440,216.14 \$ 1,027,063.35 |
| 28 | Net Margin Requirement | L26 - L27 | | | | | | | | \$ 275,777.56 \$ 359,426.73 |
| 29 | | | | | | | | | | |
| 30 | Total Revenue Requirements | | | | | | | | | |
| 31 | Using the greater of OTIER or MDSC Margin Requirements | L19 + L28 | | | | | | | | \$ 1,709,535.53 |
| 32 | Divided By Total (Retail and Wholesale) Billing Demand | WP5, L30, Col (Total) | | | | | | | | \$ 580,165.24 kW |
| 33 | Resultant Unit Rate | L31 / L32 | | | | | | | | \$ 2.95 /KW-mo |

Exhibit JED - 1

| WP-1 Line No | Description | Source (b) | (c) | Amount | | Notes (f) |
|-----------------|--|---------------------------|-----|--------------------------------|------------------|-------------------------|
| | | | | (d) | (e) | |
| 1 | A. Net Plant in Service | | | As of December 31, 2023 | | |
| 2 | | | | | Accum. Res. for | |
| 3 | 1. Facilities Used to Provide Local Access Delivery Service | | | Plant in Service | Depr. | |
| 4 | Transmission Facilities | Trial Balance | | | | |
| 5 | 350 Land and land Rights | Trial Balance | | \$ 58,101.15 | | 350 |
| 6 | 352 Structures and Improvements | Trial Balance | | \$ - | | 352 |
| 7 | 353 Station Equipment | Trial Balance | | \$ - | | 353 |
| 8 | 355 Poles and Fixtures | Trial Balance | | \$ 3,951,622.85 | | 355 |
| 9 | 356 O.H. Conductors and Devices | Trial Balance | | \$ 6,972,733.84 | | 356 |
| 10 | 358 U.G. Conductors and Devices | Trial Balance | | \$ - | | 358 |
| 11 | Subtotal | Sum(L5:L10) | | \$ 10,982,457.84 | \$ 9,088,246.14 | GL acct 108.5 |
| 12 | Distribution Facilities (If Applicable) | | | | | |
| 13 | 360 Land and Land Rights | Company Direct Assessment | | - | N/A | 360 34.5 kVA Facilities |
| 14 | 361 Structures and Improvements | Company Direct Assessment | | - | N/A | 361 34.5 kVA Facilities |
| 15 | 362 Station Equipment | Company Direct Assessment | | 11,685,398.36 | 4,855,450.01 | 362 34.5 kVA Facilities |
| 16 | 364 Poles, Towers, and Fixtures | Company Direct Assessment | | 3,798,288.82 | 1,772,534.78 | 364 34.5 kVA Facilities |
| 17 | 365 Overhead Conductors and Devices | Company Direct Assessment | | 2,564,568.27 | 1,196,798.53 | 365 34.5 kVA Facilities |
| 18 | 367 Underground Conductors and Devices | Company Direct Assessment | | 39,845.27 | 18,594.46 | 367 34.5 kVA Facilities |
| 19 | 368 Line Transformers | Company Direct Assessment | | 56,630.81 | 26,420.31 | 368 34.5 kVA Facilities |
| 20 | 369 Services | Company Direct Assessment | | 6,579.21 | 3,069.44 | 369 34.5 kVA Facilities |
| 21 | 370 Meters | Company Direct Assessment | | - | - | 370 34.5 kVA Facilities |
| 22 | Subtotal | Sum(L13:L21) | | \$ 18,151,310.74 | 7,872,867.53 | |
| 23 | Total | L11 + L22 | | \$ 29,133,768.58 | \$ 16,961,113.67 | GL acct 108.5 |
| 24 | | | | | | |
| 25 | 2. All Facilities | | | | | |
| 26 | 114 Electric Plant Amort | Trial Balance | | \$ 5,409,446.27 | \$ 2,848,880.34 | GL acct 115.0 |
| 27 | 350-359 Transmission Plant | Trial Balance | | \$ 10,982,457.84 | \$ 9,088,246.14 | GL acct 108.5 |
| 28 | 360 - 373 Distribution Plant | Trial Balance | | \$ 98,851,593.37 | \$ 23,950,888.05 | GL acct. 108.6, 108.61 |
| 29 | 389-399 General Plant | Trial Balance | | \$ 16,277,812.90 | \$ 7,713,571.83 | GL acct. 108.7-108.78 |
| 30 | Total | | | \$ 131,521,310.38 | \$ 43,601,586.36 | All Plant |
| 31 | | | | | | |
| 32 | | | | | | |
| 33 | | | | | | |

Exhibit JED - 1

| WP-1 Cont Line No | Source (b) | (c) | Amount (d) | (e) | Notes (f) |
|----------------------|--|---------------------------|------------------|---------------------------|---|
| 34 | B. Operating Expenses | | | Historical Test Year 2023 | |
| 35 | All East Division | | | | |
| 36 | Power Production Expense | Statement of Operations | | | All East Division |
| 37 | Cost of Purchased Power | Statement of Operations | \$ 16,185,587.79 | | All East Division |
| 38 | Transmission O&M | Statement of Operations | \$ 123,739.42 | | All East Division |
| 39 | Distribution Expense-Operation | Statement of Operations | \$ 798,355.65 | | All East Division |
| 40 | Distribution Expense-Maintenance | Statement of Operations | \$ 1,365,090.12 | | All East Division |
| 41 | Consumer Accounts Expense | Statement of Operations | \$ 538,942.50 | | All East Division |
| 42 | Customer Service and Informational Expense | Statement of Operations | \$ 84,454.66 | | All East Division |
| 43 | Sales Expense | Statement of Operations | \$ 125,661.35 | | All East Division |
| 44 | Administrative and General | Statement of Operations | \$ 3,023,244.36 | | All East Division |
| 45 | Depreciation and Amortization | Statement of Operations | \$ 4,189,021.75 | | All East Division |
| 46 | Depreciation Expense - Distribution | Trial Balance | \$ 57,082.44 | | All East Division |
| 47 | Depreciation Expense - Transmission | Trial Balance | \$ 3,457,869.67 | | All East Division |
| 48 | Depreciation Expense - General Plant & Amort of Elec Plant | Trial Balance | \$ 674,069.64 | | All East Division |
| 49 | Amortization of AP (booked within Depreciation Expense) | Trial Balance | | | All East Division |
| 50 | Property Tax | Statement of Operations | \$ 1,053,957.03 | | All East Division |
| 51 | Other Taxes | Statement of Operations | \$ 625.32 | | Gross Receipts and Other Taxes All East Division |
| 52 | L.T. Interest | Statement of Operations | \$ 2,863,944.86 | | All East Division |
| 53 | Interest Charged to Construction - Credit | Statement of Operations | \$ - | | All East Division |
| 54 | Interest-Other | Statement of Operations | \$ 476,947.09 | | All East Division |
| 55 | Other Deductions | Statement of Operations | \$ 40,321.20 | | All East Division |
| 56 | | | | | |
| 57 | Directly Assigned 34.5 OM Expenses | | | | |
| 58 | Transmission O&M | Company Direct Assessment | \$ 123,739.42 | | 560-573 Direct 34.5 kVA Expenses |
| 59 | Distribution Expense-Operation | Company Direct Assessment | \$ - | | 580-589 Direct 34.5 kVA Expenses |
| 60 | Distribution Expense-Maintenance | Company Direct Assessment | \$ - | | 590-599 Direct 34.5 kVA Expenses |
| 61 | Consumer Accounts Expense | Company Direct Assessment | \$ - | | 901-905 Direct 34.5 kVA Expenses |
| 62 | Customer Service and Informational Expense | Company Direct Assessment | | | 907-910 Direct 34.5 kVA Expenses |
| 63 | Sales Expense | Company Direct Assessment | \$ - | | 911-916 Direct 34.5 kVA Expenses |
| 64 | Administrative and General | Company Direct Assessment | \$ - | | 920-932 Direct 34.5 kVA Expenses |
| 65 | Total Direct 34.5 Expenses | | \$ 123,739.42 | | |
| 66 | | | | | |

Exhibit JED - 1

| <u>WP-1 Cont</u> | <u>Source</u> | (c) | <u>Amount</u> | (e) | <u>Notes</u> | (f) |
|------------------|----------------------------------|-----------------------------|-----------------|-----|------------------------|-------------------------|
| <u>Line No</u> | (b) | | (d) | | | |
| 67 | C. Payroll | | | | | |
| 68 | Total East Wages | | | | <u>Part of GL acct</u> | |
| 69 | Transmission | Payroll Journal (Labor Amt) | \$ 90,896.28 | | 560-573 | All East Payroll |
| 70 | Distribution Operation | Payroll Journal (Labor Amt) | \$ 678,816.97 | | 580-589 | All East Payroll |
| 71 | Distribution Maintenance | Payroll Journal (Labor Amt) | \$ 700,428.49 | | 590-599 | All East Payroll |
| 72 | Customer Accounting | Payroll Journal (Labor Amt) | \$ 524,354.51 | | 901-905 | All East Payroll |
| 73 | Customer Service and Information | Payroll Journal (Labor Amt) | | | 907-910 | All East Payroll |
| 74 | Sales | Payroll Journal (Labor Amt) | \$ 14,754.25 | | 911-916 | All East Payroll |
| 75 | Administration and General | Payroll Journal (Labor Amt) | \$ 1,731,863.15 | | 920-932 | All East Payroll |
| 76 | Total | | \$ 3,741,113.65 | | | Non-capitalized items |
| 77 | Direct 34.5 Payroll | | | | | |
| 78 | Transmission | Company Direct Assessment | \$ 90,896.28 | | 560-573 | Direct 34.5 kVA Payroll |
| 79 | Distribution Operation | Company Direct Assessment | \$ - | | 580-589 | Direct 34.5 kVA Payroll |
| 80 | Distribution Maintenance | Company Direct Assessment | \$ - | | 590-599 | Direct 34.5 kVA Payroll |
| 81 | Customer Accounting | Company Direct Assessment | \$ - | | 901-905 | Direct 34.5 kVA Payroll |
| 82 | Customer Service and Information | Company Direct Assessment | | | 907-910 | Direct 34.5 kVA Payroll |
| 83 | Sales | Company Direct Assessment | \$ - | | 911-916 | Direct 34.5 kVA Payroll |
| 84 | Administration and General | Company Direct Assessment | \$ - | | 920-932 | Direct 34.5 kVA Payroll |
| 85 | Total | | \$ 90,896.28 | | | Non-capitalized items |

Exhibit JED - 1

WP-1 Cont
Line No

| | Source (b) | (c) | Amount (d) | (e) | Notes (f) | |
|----|---|-------------------------------|---------------|--------------|---------------------|-----------------------------------|
| 73 | D. Miscellaneous | | | | | |
| 74 | 1. Debt Service | | | | | |
| 75 | Principal Payments | Supplementary Company Records | | | | |
| 76 | | | | | | |
| 77 | 2. Target OTIER/MDSC | As approved by commission | | | | |
| 78 | | | | | | |
| 79 | 3. Margin Requirement Offsets | | | | | |
| 80 | Investment in Associate Organizations - Patronage Capital | Balance Sheet | \$ | 5,458,837.66 | Balance Sheet | Hard Keyed |
| 81 | Generation & Transmission Capital Credits | Statement of Operations | \$ | - | | |
| 82 | Other Capital Credits and Patronage Dividends | Statement of Operations | \$ | 130,857.83 | | |
| 83 | Non-Operating Margins - Interest | Statement of Operations | \$ | 5,543.91 | | |
| 84 | Cash Received from G&T/Lenders | Supplementary Company Records | \$ | 217,535.91 | Per Company records | Weighted Lender and G&T Parionage |
| 85 | | | | | | |
| 86 | 4. Other | | | | | |
| 87 | AP Amortization Booked in Other Deductions | Supplementary Company Records | | | Per Company records | |

Exhibit JED - 1

WP-2

| Line No | Type | Source | Amount | Notes |
|---------|---|----------------------|------------------------|--------------------------|
| 1 | 1. Adjustment to Administrative & General per K.S.A 66-101(a), if any: | | | |
| 2 | Applicable Disallowance - A&G | WP6 | \$ (287,776.65) | |
| 3 | Total Adjustment | L10 | \$ (287,776.65) | |
| 4 | | | | |
| 5 | 2. Adjustment to Other Deductions | | | |
| 6 | Historical Amount | Pg.1, L18, Col (d) | \$ 40,321.20 | |
| 7 | Less: Amortization of AP booked in Other Deductions | WP1, L74, Col (e) | \$ - | amort. of AP is constant |
| 8 | Historical Amount with AP removed | L34 - L35 | \$ 40,321.20 | |
| 9 | Sub-total Adjustment | L36 - L34 | \$ - | |
| 10 | Less: Applicable Disallowance - Other Deductions | WP6 | \$ 40,321.20 | Dkt. No. 15-PLCE-176-TAR |
| 11 | Total Adjustment | L37 - L38 | \$ (40,321.20) | |
| 12 | | | | |

Exhibit JED - 1

| Line No | Description | Source | Allocator | Amount |
|-------------|--|-------------------|-----------|-----------------|
| WP-3 | | | | |
| 1 | OM Expenses Allocation | | | |
| 2 | O&M Expense | | | |
| 3 | Transmission O&M | WP1, L37, Col (d) | | \$ 123,739.42 |
| 4 | Distribution Expense-Operation | WP1, L38, Col (d) | | \$ 798,355.65 |
| 5 | Distribution Expense-Maintenance | WP1, L39, Col (d) | | \$ 1,365,090.12 |
| 6 | Consumer Accounts Expense | WP1, L40, Col (d) | | \$ 538,942.50 |
| 7 | Customer Service and Informational Expense | WP1, L41, Col (d) | | \$ 84,454.66 |
| 8 | Sales Expense | WP1, L42, Col (d) | | \$ 125,661.35 |
| 9 | Administrative and General | WP1, L43, Col (d) | | \$ 3,023,244.36 |
| 10 | Total O&M Expense | Sum of L3:9 | | \$ 6,059,488.06 |
| 11 | | | | |
| 12 | 34.5 Direct Expenses | | | |
| 13 | Transmission O&M | WP1, L58, Col (d) | | \$ 123,739.42 |
| 14 | Distribution Expense-Operation | WP1, L59, Col (d) | | \$ - |
| 15 | Distribution Expense-Maintenance | WP1, L60, Col (d) | | \$ - |
| 16 | Consumer Accounts Expense | WP1, L61, Col (d) | | \$ - |
| 17 | Customer Service and Informational Expense | WP1, L62, Col (d) | | \$ - |
| 18 | Sales Expense | WP1, L63, Col (d) | | \$ - |
| 19 | Administrative and General | WP1, L64, Col (d) | | \$ - |
| 20 | Total 34.5 Payroll | Sum of L13:19 | | \$ 123,739.42 |
| 21 | | | | |
| 22 | Expense Allocation | | | |
| 23 | Transmission O&M | | DOM1 | 1.000000 |
| 24 | Distribution Expense-Operation | | DOM2 | 0.000000 |
| 25 | Distribution Expense-Maintenance | | DOM3 | 0.000000 |
| 26 | Consumer Accounts Expense | | DOM4 | 0.000000 |
| 27 | Customer Service and Informational Expense | | DOM5 | 0.000000 |
| 28 | Sales Expense | | DOM6 | 0.000000 |
| 29 | Administrative and General | | DOM7 | 0.000000 |
| 30 | | | | |

Exhibit JED - 1

WP-3 Cont

| Line No | Description | Source | Allocator | Amount |
|---------|---|---------------------|-----------|-------------------|
| 31 | General Plant | | | |
| 32 | 34.5 System Direct Wages | WP1, L85, Col (d) | | \$ 90,896.28 |
| 33 | | | | |
| 34 | Total Wages other than A&G | | | |
| 35 | Total Wages | WP1, L76, Col (d) | | \$ 3,741,113.65 |
| 36 | Less: Administration & General Wages | WP1, L75, Col (d) | | \$ 1,731,863.15 |
| 37 | | L35 - L34 | | \$ 2,009,250.50 |
| 38 | | | | |
| 39 | Transmission Labor Allocator | L32/L37 | LAB | 0.0452389 |
| 40 | | | | |
| 41 | Net Plant Allocation Factor | | | |
| 42 | Plant-in-Service | | | |
| 43 | Transmission | WP1, L11, Col (d) | | \$ 10,982,457.84 |
| 44 | Distr. Used to provide Local Access Service | WP1, L22, Col (d) | | \$ 18,151,310.74 |
| 45 | General Plant | | | |
| 46 | Total General Plant | WP1, L29, Col (d) | | \$ 16,277,812.90 |
| 47 | Allocation Factor | L39 | | 0.0452389 |
| 48 | | L46 * L47 | | \$ 736,390.33 |
| 49 | Total LAD System Plant-in-Service | L43 + L44 + L47 | | \$ 29,870,158.91 |
| 50 | | | | |
| 51 | Accumulated Reserves for Depreciation | | | |
| 52 | Transmission | WP1, L11, Col (e) | | \$ 9,088,246.14 |
| 53 | Distribution | WP1, L22, Col (e) | | \$ 7,872,867.53 |
| 54 | Allocated General Plant | | | |
| 55 | Total General Plant | WP1, L29, Col (e) | | \$ 7,713,571.83 |
| 56 | Allocation Factor | L39 | | 0.0452389 |
| 57 | | L55 * L56 | | \$ 348,953.50 |
| 58 | Total LAD Accum. System Depr. Res | L52 + L53 + L56 | | \$ 17,310,067.16 |
| 59 | | | | |
| 60 | Net Plant Used in LAD System | L49 - L58 | | \$ 12,560,091.75 |
| 61 | | | | |
| 62 | Total Plant In Service | WP1, L30, Col (d) | | \$ 131,521,310.38 |
| 63 | Less: Total Accum. Reserves for Depr. | WP1, L30, Col (e) | | \$ 43,601,586.36 |
| 64 | Total Net Plant | L62 - L63 | | \$ 87,919,724.02 |
| 65 | | | | |
| 66 | Transmission Net Plant Allocator | L60/L64 | NP | 0.142859 |

Exhibit JED - 1

| <u>WP-4</u> | | | | | | | |
|-------------|---|--------------------|-----------------------|-----------------------|-------------------|----------|------------------------|
| (a) | (b) | (c) | (d) | (e) | (f) | (g) | |
| Line No | Metric | Source | Historical Tot Amount | Name | Allocation Factor | Factor | Allocated to FBR |
| 1 | OTIER | | | pg. 1 Col (g) and (h) | | | |
| 2 | LT Interest Expense | Pg.1, L15, Col (d | \$ 2,863,944.86 | NP | | 0.142859 | \$ 409,139.25 |
| 3 | Cash Received from G&T/lenders | WP1, Col (d), L77 | \$ 217,535.91 | NP | | 0.142859 | \$ 31,076.88 |
| 4 | | | \$ 3,081,480.77 | | | | <u>\$ 440,216.14</u> |
| 5 | | | | | | | |
| 6 | MDSC | | | | | | |
| 7 | LT Interest Expense | L2 | \$ 2,863,944.86 | NP | | 0.142859 | \$ 409,139.25 |
| 8 | Depreciation Expense | Pg.1, L12, Col (d | \$ 4,189,021.75 | NP | | 0.142859 | \$ 598,437.93 |
| 9 | Non-Operating Margins - Interest | WP1, L76, Col (d | \$ 5,543.91 | NP | | 0.142859 | \$ 792.00 |
| 10 | Cash Patronage Capital* | L18 | \$ 130,857.83 | NP | | 0.142859 | \$ 18,694.17 |
| 11 | Resultant Amount | Sum (L7:L10) | \$ 7,189,368.35 | | | | <u>\$ 1,027,063.35</u> |
| 12 | | | | | | | |
| 13 | *Calculate Pat. Cap. (Cash): | | | | | | |
| 14 | Inv. in Assoc. Org. - Patr. Capital - Current Yr. | WP1, L80, Col (d | \$ 5,458,837.66 | | | | |
| 16 | Generation & Transmission Capital Credits | WP1, L81, Col (d | \$ - | | | | |
| 17 | Other Capital Cr. and Patronage Dividends | WP1, L82, Col (d | \$ 130,857.83 | | | | |
| 18 | Resultant Amount | L15 + L16 + L17 | \$ 130,857.83 | | | | |

Exhibit JED - 1

WP-5

| Line | Description | Jan | Feb | Mar | Apr | May | Jun | July | Aug | Sep | Oct | Nov | Dec | Total |
|------|--|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------|
| 1 | Total Local Access System ¹ | 42,224 | 39,982 | 34,739 | 38,712 | 47,693 | 61,553 | 65,386 | 73,074 | 55,690 | 47,717 | 36,968 | 33,949 | 577,687 |
| 2 | CP Date | 30 | 23 | 26 | 12 | 30 | 28 | 31 | 1 | 1 | 2 | 27 | 19 | |
| 3 | CP Time (hour Ending) | 800 | 900 | 800 | 1500 | 1500 | 1600 | 1500 | 1600 | 1600 | 1500 | 1000 | 1000 | |
| 4 | | | | | | | | | | | | | | |
| 5 | Wholesale Customers @ Del. Pt. | | | | | | | | | | | | | 1.00 |
| 6 | MWE 2nd & Kansas 115 B Ch1 | - | 0.25 | - | 0.75 | - | - | - | - | - | - | - | - | - |
| 7 | MKEC GBS Center # 10 - Sub Ch2 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 | WCEA KS B & T 13.8 # 17 - Sub Ch1 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 11 | WCEA KS B & T 34.5 # 8 - Sub Ch1 | 4,452.25 | 4,783.25 | 3,923.50 | 7,245.50 | 4,283.50 | 4,730.00 | 5,051.00 | 11,345.50 | 4,078.00 | 4,027.25 | 3,840.00 | 3,965.50 | 61,725.25 |
| 12 | KEPCo Attica | 853.02 | 760.50 | 673.02 | 574.38 | 810.06 | 853.80 | 935.22 | 1,049.22 | 853.02 | 689.46 | 665.58 | 670.74 | 9,388.02 |
| 13 | KPP City of Attica Ch1 | 863.00 | 794.00 | 676.00 | 610.00 | 960.00 | 1,445.00 | 1,463.00 | 1,572.00 | 1,361.00 | 1,074.00 | 765.00 | 691.00 | 12,274.00 |
| 14 | SPECo Chain Ranch # 1 - Sub Ch2 | 0.25 | 0.25 | 0.25 | 0.25 | - | 0.25 | - | 0.25 | - | 0.25 | 0.25 | 0.25 | 2.25 |
| 15 | SPECo Hazelton # 2 - Sub Ch1 | 0.50 | 0.75 | 0.75 | 1,130.25 | 0.75 | 1,514.50 | 1,570.25 | 1,728.00 | 0.75 | 0.75 | 0.50 | 0.75 | 5,948.50 |
| 16 | KEPCo Alameda | 422.40 | 406.32 | 630.48 | 457.44 | 509.46 | 814.02 | 584.04 | 341.58 | 466.74 | 550.50 | 552.18 | 511.62 | 6,246.78 |
| 17 | KEPCo Kingman | 1,095.06 | 885.18 | 797.34 | 722.94 | 1,092.90 | 1,439.10 | 1,750.56 | 1,637.64 | 1,396.02 | 1,171.32 | 780.90 | 707.94 | 13,476.90 |
| 18 | KEPCo Pretty Prairie | 1,609.14 | 990.72 | 602.40 | 686.88 | 1,247.16 | 1,140.24 | 1,092.66 | 1,194.54 | 1,121.70 | 1,050.66 | 1,246.20 | 638.58 | 12,620.88 |
| 19 | KEPCo Norwich | 307.86 | 247.74 | 106.44 | 106.98 | 198.42 | 382.38 | 325.38 | 369.90 | 311.64 | 218.64 | 190.50 | 106.56 | 2,872.44 |
| 20 | KEPCo Runny Meade | 896.88 | 877.50 | 891.90 | 1,000.26 | 936.30 | 1,164.54 | 1,306.50 | 1,308.36 | 1,273.38 | 1,047.72 | 867.66 | 274.32 | 11,845.32 |
| 21 | SPECo Calista # 13 - Sub Ch2 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 22 | MWE Partridge MWE - Sub Ch1 | 0.25 | - | - | - | - | - | - | - | - | - | 0.25 | 0.25 | 0.75 |
| 23 | SPECo Zenda # 12 - Sub Ch2 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 24 | KEPCo Bluff City | 605.82 | 711.42 | 90.30 | 473.52 | 428.58 | 211.40 | 453.18 | 269.88 | 411.30 | 414.36 | 254.58 | 261.42 | 4,585.76 |
| 25 | KEPCo Caldwell | 236.40 | 246.72 | 180.72 | 194.58 | 216.30 | 244.14 | 264.18 | 264.18 | 300.00 | 251.76 | 228.06 | 214.62 | 2,841.66 |
| 26 | KEPCo Milan | 511.68 | 442.92 | 412.26 | 291.12 | 541.80 | 764.28 | 827.58 | 881.76 | 805.02 | 515.22 | 392.16 | 402.18 | 6,787.98 |
| 27 | Subtotal | 11,854.51 | 11,147.52 | 8,985.36 | 13,494.85 | 11,225.23 | 14,703.65 | 15,623.55 | 21,962.81 | 12,378.57 | 11,011.89 | 9,783.82 | 8,445.73 | 150,617.49 |
| 28 | Losses @ 1.35% of 34.5 kV Output | 160.04 | 150.49 | 121.30 | 182.18 | 151.54 | 198.50 | 210.92 | 296.50 | 167.11 | 148.66 | 132.08 | 114.02 | 2,033.34 |
| 29 | Subtotal with Losses (@ Source) | 12,014.55 | 11,298.01 | 9,106.66 | 13,677.03 | 11,376.77 | 14,902.15 | 15,834.47 | 22,259.31 | 12,545.68 | 11,160.55 | 9,915.90 | 8,559.75 | 152,650.83 |
| 30 | | | | | | | | | | | | | | |
| 31 | Prairie Land Retail 26 Retail with Losses | | | | | | | | | | | | | |
| 32 | Retail with Losses (@ Source) | 30,370.00 | 28,834.00 | 25,753.00 | 25,217.00 | 36,468.00 | 46,849.00 | 49,673.00 | 51,111.00 | 43,312.00 | 36,706.00 | 27,184.00 | 33,949.00 | 435,426.00 |
| 33 | Losses @ 1.35% of 34.5 kV Input | 410.00 | 389.26 | 347.67 | 340.43 | 492.32 | 632.46 | 670.59 | 690.00 | 584.71 | 495.53 | 366.98 | 458.31 | 5,878.25 |
| 34 | Retail @ Delivery Point | 29,960.01 | 28,444.74 | 25,405.33 | 24,876.57 | 35,975.68 | 46,216.54 | 49,002.41 | 50,421.00 | 42,727.29 | 36,210.47 | 26,817.02 | 33,490.69 | 429,547.75 |
| 35 | | | | | | | | | | | | | | |
| 36 | Total Load (wholesale at source before loss + retail @ delivery pt.) | | | | | | | | | | | | | 580,165.24 |

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

Exhibit JED - 1

WP-6

| Line | Account | Description | Total Amount | Total Adjustment |
|------|---------|--------------------------------------|-----------------|------------------|
| 1 | 909.00 | ADVERTISING (INFORMATIONAL & INSTRUC | \$ 79,387.96 | \$ 79,387.96 |
| 2 | 912.00 | DEMONSTRATION & SELLING EXPENSES | \$ 77,698.62 | \$ 77,698.62 |
| 3 | 913.00 | ADVERTISING EXPENSES | \$ 47,962.73 | \$ 47,962.73 |
| 4 | 930.20 | MISCELLANEOUS GENERAL EXPENSES | \$ 82,727.34 | \$ 82,727.34 |
| 5 | | | | \$ 287,776.65 |
| 6 | | | Staff -Adjusted | \$ 287,776.65 |

Dkt. No. 15-PLCE-176-TAR

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|--|--------------|
| 909.00 | KCL Subscription/Centerspread/Cover/Post | \$ 78,928.63 |
| 909.00 | mylar balloons for Caldwell safety demo | 32.55 |
| 909.00 | podcast hosting | 15.78 |
| 909.00 | promotional items for safety demos | 354.75 |
| 909.00 | supplies for GB electric safety demo | 56.25 |
| 912.00 | 12 Days of Christmas Give away | 55.60 |
| 912.00 | 12 Days of Christmas giveaway items | 18.89 |
| 912.00 | 12 days of Christmas wrapping supplies | 80.97 |
| 912.00 | 2023 Power the Pantry (Cram the Van) | 262.92 |
| 912.00 | Anniston Lee 1219414 | 1,000.00 |
| 912.00 | annual meeting decorations/supplies | 37.51 |
| 912.00 | annual meeting door prizes | 246.34 |
| 912.00 | Annual Meeting Gifts 2023 | 10,490.51 |
| 912.00 | Annual Meeting Gifts 2023-Sales Tax | 944.15 |
| 912.00 | annual meeting grand prize | 310.32 |
| 912.00 | annual meeting promotional supplies | 515.92 |
| 912.00 | annual meeting sample gift | 38.16 |
| 912.00 | annual meeting supplies | 87.61 |
| 912.00 | bags for annual meeting | 170.26 |
| 912.00 | bat cats giveaway custom baseballs | 163.05 |
| 912.00 | Batch WE1-2023-05-15-09 | 287.50 |
| 912.00 | big check for presentation GB | 97.30 |
| 912.00 | big dry erase check for cram the van | 36.42 |
| 912.00 | Bill Calc - Cycle 2 | 1,140.00 |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|--|----------|
| 912.00 | books valentines day coloring contest | 23.32 |
| 912.00 | bouquets for youth tour winners | 35.25 |
| 912.00 | bowls/platters for super bowl giveaways | 20.57 |
| 912.00 | branded totes and safety bracelets | 959.76 |
| 912.00 | Business After Hours | 433.70 |
| 912.00 | cell phone bags GB chamber after hours | 5.43 |
| 912.00 | certificate of mailing youth tour | 32.12 |
| 912.00 | christmas ribbon for giveaways | 17.58 |
| 912.00 | Chrtimas Mix for CC Harvest Days | 456.54 |
| 912.00 | class gifts valentines day color contest | 79.81 |
| 912.00 | coloring books for Vday coloring contest | 11.92 |
| 912.00 | Cram the Van | 844.35 |
| 912.00 | Cram the Van Ad | 156.88 |
| 912.00 | Cram the Van Shirts | 897.70 |
| 912.00 | cups and decor for annual meeting | 92.08 |
| 912.00 | custom bandanas GB chamber after hours | 869.68 |
| 912.00 | decor for GB chamber after hours | 196.63 |
| 912.00 | decorations GB chamber after hours | 573.89 |
| 912.00 | dinnerware for GB chamber after hours | 681.06 |
| 912.00 | door prizes annual meeting | 131.46 |
| 912.00 | door prizes for annual meeting | 88.33 |
| 912.00 | drinks for GB chamber after hours | 3,214.13 |
| 912.00 | drinks for member engagement dinner HP | 264.73 |
| 912.00 | EV charging station adapters GB office | 86.94 |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|---|--------|
| 912.00 | expo markers and wipes for large checks | 3.34 |
| 912.00 | Fleet Management Transaction | 750.21 |
| 912.00 | GB Schools Business Showcase | 110.73 |
| 912.00 | gift box member engagement dinner HP | 59.15 |
| 912.00 | gift cards for youth tour | 109.90 |
| 912.00 | gift certificate GB Bat Cats game | 20.00 |
| 912.00 | gifts honorable mention holdiday lights | 42.63 |
| 912.00 | giveaway item GB chamber after hours | 250.00 |
| 912.00 | giveaway item member engagement HP | 92.38 |
| 912.00 | giveaway items 12 days of Christmas | 334.73 |
| 912.00 | giveaway items for GB Bat Cats | 40.00 |
| 912.00 | giveaway items for GB Bat Cats game | 75.00 |
| 912.00 | givewaawy for GB chamber after hours | 20.43 |
| 912.00 | grand prize annual meeting gift card | 87.64 |
| 912.00 | Holiday, Funeral, Jury, Other Paid Time | 400.47 |
| 912.00 | HP member engagement supplies | 43.08 |
| 912.00 | ice cream machine social media giveaway | 37.79 |
| 912.00 | ice for member engagement meeting | 12.70 |
| 912.00 | ice trays for annual meeting | 40.10 |
| 912.00 | items - Valentines Day coloring contest | 192.44 |
| 912.00 | items for GB chamber after hours | 559.43 |
| 912.00 | items for gift baskets to keep on hand | 77.29 |
| 912.00 | items for member engagement dinner HP | 217.00 |
| 912.00 | key accounts gifts | 23.36 |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|--|-----------|
| 912.00 | koozies for parades, open houses, etc. | 271.56 |
| 912.00 | KSU career fair giveaways | 25.00 |
| 912.00 | LABOR DISTRIBUTION | 14,353.78 |
| 912.00 | lineman of the week certificates | 31.96 |
| 912.00 | Manhattan career fair items | 40.06 |
| 912.00 | meal for Argonia student shadows - KH | 45.00 |
| 912.00 | meal for GB CTV lunch | 210.77 |
| 912.00 | meal youth tour presentation CS - KH | 14.08 |
| 912.00 | memb. service giveaway KC Royals Tickets | 117.22 |
| 912.00 | Member Engagement Invites | 74.70 |
| 912.00 | Membership Invites | 23.00 |
| 912.00 | Miscellaneous Charges | 1,535.00 |
| 912.00 | NRECA 2024 Spotlight on Excellence | 736.18 |
| 912.00 | October OBJ Advertising | 197.19 |
| 912.00 | office buddy cubes - business showcase | 3,777.89 |
| 912.00 | partial refund appreciation gifts | (10.13) |
| 912.00 | postage for lineman of the week | 10.25 |
| 912.00 | postage for lineman of the week items | 12.90 |
| 912.00 | postage for shipping lineman of week | 6.25 |
| 912.00 | postage honorable mention holdiday light | 22.70 |
| 912.00 | postage mem. service spotlight entries | 4.49 |
| 912.00 | Power the Pantry | 1,075.75 |
| 912.00 | Power the Pantry Artwork | 92.02 |
| 912.00 | Power the Pantry Pens | 207.25 |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|--|----------|
| 912.00 | Power the Pantry Winner | 500.00 |
| 912.00 | prizes for Valentine's coloring contest | 96.39 |
| 912.00 | prizes Valentine's coloring contest | 44.53 |
| 912.00 | promo items for GB/GC baseball events | 642.89 |
| 912.00 | promotional keychains | 294.63 |
| 912.00 | Reclass Chamber After Hours Meal | 8,000.00 |
| 912.00 | return annual meeting decoration | (33.21) |
| 912.00 | return annual meeting supplies | (13.38) |
| 912.00 | return christmas gift boxes | (10.53) |
| 912.00 | sample annual meeting gifts | 23.96 |
| 912.00 | Scholarship: Faith Stuhlsatz 1218.94 | 1,000.00 |
| 912.00 | Scholarship: Madelynn Gregg 000524530 | 1,000.00 |
| 912.00 | Scholarship: Madison Haley N00452747 | 1,000.00 |
| 912.00 | Scholarship: Nayomi Olivas | 2,000.00 |
| 912.00 | Scholarship: Teja Samuelson 1122744 | 1,000.00 |
| 912.00 | Scholarship: Wesley Weishaar M322P757 | 1,000.00 |
| 912.00 | School Competition Flyers | 279.60 |
| 912.00 | ship prizes V-day contest winners | 191.55 |
| 912.00 | shipping 12 days of Christmas items | 108.67 |
| 912.00 | snack items for super bowl giveaways | 34.45 |
| 912.00 | snakcs for youth tour candidates | 37.26 |
| 912.00 | stickers for holiday / St. Francis gifts | 76.42 |
| 912.00 | superbowl giveaway items | 93.56 |
| 912.00 | superbowl social media contest prize | 43.82 |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|--|----------|
| 912.00 | supplies for annual meeting | 453.59 |
| 912.00 | supplies for GB Bat Cats game | 1,097.72 |
| 912.00 | supplies for GB Business Showcase | 78.81 |
| 912.00 | supplies for GB chamber after hours | 4,059.48 |
| 912.00 | supplies for GB Chamber Coffee | 69.97 |
| 912.00 | supplies for member engagement dinner HP | 83.07 |
| 912.00 | supplies for member service baskets | 45.46 |
| 912.00 | supplies member services gift baskets | 73.94 |
| 912.00 | table runners for GB chamber after hours | 195.66 |
| 912.00 | tablecloths- annual meeting board dinner | 253.29 |
| 912.00 | trivets - potential annual meeting gifts | 20.99 |
| 912.00 | Valentine's day color contest prizes | 56.91 |
| 912.00 | Valentine's day coloring contest prizes | 121.66 |
| 912.00 | Valentine's day coloring contest supp. | 17.18 |
| 912.00 | water for member service events GB | 1,028.32 |
| 913.00 | 040323-043023 Advertising | 236.53 |
| 913.00 | 052923-062523 Golden Belt Cinema | 326.93 |
| 913.00 | 061523: Harvest Ad | 44.87 |
| 913.00 | 062223: Harvest Ad | 44.87 |
| 913.00 | 070123 - Fair Section | 67.92 |
| 913.00 | 070123: Fireworks Safety | 12.12 |
| 913.00 | 070423-072523: Meals on Wheels | 52.58 |
| 913.00 | 072423-082023 Movie Theatre Ads | 143.26 |
| 913.00 | 072523: Fair Sections | 33.96 |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|--|----------|
| 913.00 | 080123-083123 KSN Advertising | 494.41 |
| 913.00 | 09-2023 Billboard Advertising | 186.23 |
| 913.00 | 1 Yr Agreement: Banner | 250.00 |
| 913.00 | 10-2023 Cox Advertising | 766.85 |
| 913.00 | 120122-123122 Advertising | 763.35 |
| 913.00 | 20023 Firework Display | 500.00 |
| 913.00 | 2023 Annual Dinner and Auction | 2,000.00 |
| 913.00 | 2023 Border Queen Cruisers | 150.00 |
| 913.00 | 2023 Busniess Showcase | 65.73 |
| 913.00 | 2023 Chamber Membership | 40.00 |
| 913.00 | 2023 Ducks unlimited Banquet | 285.00 |
| 913.00 | 2023 GB American Legion Baseball Sponsor | 300.00 |
| 913.00 | 2023 Golf Tournament Hole Sponsorship | 100.00 |
| 913.00 | 2023 Great Bend Bat Cats Sponsorship | 850.00 |
| 913.00 | 2023 Kingman County Fair | 250.00 |
| 913.00 | 2023 KS INDEPENDENT OIL AND GAS BUY GUID | 270.56 |
| 913.00 | 2023 Summer REading Program | 250.00 |
| 913.00 | 2024 Rhorea Advertisement | 125.00 |
| 913.00 | 2083 Magents | 291.97 |
| 913.00 | 23 Sumnner Co Fair Guide | 95.00 |
| 913.00 | A/C 13367: March Advertising | 300.00 |
| 913.00 | A/C 800603713 | 953.87 |
| 913.00 | A/C 800603713 WECI ADVERTISEMENT | 294.83 |
| 913.00 | After Hours | 500.00 |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|---|----------|
| 913.00 | AG-News Advertising | 273.62 |
| 913.00 | Annual Billboard Contract 060123-060124 | 3,705.00 |
| 913.00 | AP Bill Invoice/Credit Payment | 3.89 |
| 913.00 | Associate Volunteer Membership Dues | 25.00 |
| 913.00 | August Advertising | 635.00 |
| 913.00 | Bat Cat Game Postcards | 98.10 |
| 913.00 | Catholic Schools Week | 52.50 |
| 913.00 | Chamber After Hours | 553.55 |
| 913.00 | Chamber After Hours Meal | 8,000.00 |
| 913.00 | Chamber After Hours: Cowboy Hat Logo | 120.00 |
| 913.00 | Christmas Edition Display Ad | 105.00 |
| 913.00 | CHS 2023 YEARBOOK ADVERTISEMENT | 100.00 |
| 913.00 | Display Ad-Power giveaway ads | 308.00 |
| 913.00 | Eagle Country 100.7 FM - Feb 23 | 350.00 |
| 913.00 | Eagle Radio June 2023 Advertising | 153.37 |
| 913.00 | Easter Ham Giveaway | 39.44 |
| 913.00 | facebook advertising | 1,679.32 |
| 913.00 | Fair Ad | 200.10 |
| 913.00 | Fall Sports Preview | 267.00 |
| 913.00 | Feb 2023 Advertising | 40.00 |
| 913.00 | February 2023 Kansas Best 22-23 IKSNN | 122.70 |
| 913.00 | February 2023 Kansas Best KSN | 190.62 |
| 913.00 | February 2023 Kansas Best KSNG | 189.74 |
| 913.00 | Free Electric for a Yr | 156.00 |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|-------------------------------------|----------|
| 913.00 | GB Sports Calendar | 75.00 |
| 913.00 | GB: 2024 Chamber Directory | 595.00 |
| 913.00 | GBHS Graduation | 710.00 |
| 913.00 | GBHS Panther Flag | 75.00 |
| 913.00 | GBHS Spring Sports Calendar | 75.00 |
| 913.00 | Golden Belt Cimena | 245.20 |
| 913.00 | Golden Belt Cinema | 1,296.14 |
| 913.00 | Golden Belt Cinema 6 & Star Theatre | 315.38 |
| 913.00 | Golden Belt Cinema 6: 010623-020523 | 315.38 |
| 913.00 | Golf Tournament Brochures | 201.10 |
| 913.00 | Golf Tournment Signage | 5.02 |
| 913.00 | google online ad's | 19.76 |
| 913.00 | google youtube ad's power your year | 27.25 |
| 913.00 | Graduate Edition | 100.00 |
| 913.00 | Harper County Fair Guide | 145.00 |
| 913.00 | Hats for the Guys | 519.38 |
| 913.00 | HP: Thank you Ad | 105.00 |
| 913.00 | June Advertising | 494.12 |
| 913.00 | Kansas Best | 424.34 |
| 913.00 | Kansas Best 2022-2023 | 102.75 |
| 913.00 | Kansas Today | 202.44 |
| 913.00 | Kansas Today KSNB | 182.97 |
| 913.00 | KHOK_FM April Advertisiing | 350.00 |
| 913.00 | KHOK_FM: May Advertising | 350.00 |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|-----------------------------------|--------|
| 913.00 | KHOK-FM August Advertising | 306.74 |
| 913.00 | KHOK-FM December 2023 Advertising | 153.37 |
| 913.00 | KHOK-FM July Advertising | 153.37 |
| 913.00 | KHOK-FM November Advertising | 153.37 |
| 913.00 | KHOK-FM October Advertising | 153.37 |
| 913.00 | KIND 107.1 Advertiserising | 300.00 |
| 913.00 | Kiwanis Flag Project | 250.00 |
| 913.00 | KKDT_FM March Advertising | 131.46 |
| 913.00 | KKDT-FM April Advertising | 131.46 |
| 913.00 | KKDT-FM August 2023 Advertising | 262.92 |
| 913.00 | KKDT-FM December 2023 Advertising | 131.46 |
| 913.00 | KKDT-FM July 2023 Advertising | 131.46 |
| 913.00 | KKDT-FM June 2023 Advertising | 131.46 |
| 913.00 | KKDT-FM Maay Advertising | 131.46 |
| 913.00 | KKDT-FM November 2023 Advertising | 131.46 |
| 913.00 | KKDT-FM October 2023 Advertising | 131.46 |
| 913.00 | KNID 107.1 Advertising | 131.46 |
| 913.00 | KNID Advertising | 131.46 |
| 913.00 | KNID June Advertising | 131.46 |
| 913.00 | KQZQ-FM 07-2023 Advertising | 175.28 |
| 913.00 | KQZQ-FM 08-2023 Advertising | 350.56 |
| 913.00 | KQZQ-FM 10-2023 Advertising | 175.28 |
| 913.00 | KQZQ-FM 11-2023 Advertising | 175.28 |
| 913.00 | KQZQ-FM 12-2023 Advertising | 175.28 |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|-----------------------------------|------------|
| 913.00 | KQZQ-FM April Advertising | 175.28 |
| 913.00 | KQZQ-FM June 2023 Advertising | 175.28 |
| 913.00 | KQZQ-FM March Advertising | 175.28 |
| 913.00 | KQZQ-FM May Advertising | 175.28 |
| 913.00 | KSN Today | 182.97 |
| 913.00 | KSN Today/Good Day Kansas | 236.31 |
| 913.00 | KSNC May Advertising | 227.86 |
| 913.00 | KSNG Advertising | 205.95 |
| 913.00 | KSNG KSN Today | 196.60 |
| 913.00 | March Slide Advertisement | 87.64 |
| 913.00 | Meals on Wheels | 960.00 |
| 913.00 | MR Invoice | (3.89) |
| 913.00 | Open House | 195.00 |
| 913.00 | Overpayment INV 3640791-7 | (3.89) |
| 913.00 | Panther Sport Cards | 30.00 |
| 913.00 | Panther Sport Cards Order # 56758 | 30.00 |
| 913.00 | Panther Sport Cards #56745 | 30.00 |
| 913.00 | Panther Sports Cards 020323 | 30.00 |
| 913.00 | Power Play Signs | 5.02 |
| 913.00 | Power Your Year | 310.00 |
| 913.00 | Power Your Year - 1/31 & 2/15 | 283.50 |
| 913.00 | power your year ad's | 20.20 |
| 913.00 | Progress Edition/Community | 350.00 |
| 913.00 | Reclass Chamber After Hours Meal | (8,000.00) |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|--|----------|
| 913.00 | Ribbon: GB After Hrs | 183.12 |
| 913.00 | S&T Advertising | 245.73 |
| 913.00 | Salute to Seniors - Conway Springs | 135.00 |
| 913.00 | Santa Email | 150.00 |
| 913.00 | Santa Email - Online | (150.00) |
| 913.00 | South Haven Cardinal Basketball | 150.00 |
| 913.00 | South Haven Cardinals | 120.00 |
| 913.00 | South Haven Cardinals Basketball | 190.00 |
| 913.00 | South Haven New Era | 80.00 |
| 913.00 | South Haven New ERA BBall Advertising | 40.00 |
| 913.00 | Sports Page | 50.00 |
| 913.00 | Sports Support Page | 50.00 |
| 913.00 | Spring Sports Preview: Sports Section | 55.00 |
| 913.00 | Star Theatre & Golden Belt Cinema 6 | 245.19 |
| 913.00 | State Congratulations | 27.40 |
| 913.00 | Teachers, Nurses, Graduation, Beef Month | 74.49 |
| 913.00 | Touchstone Energy Membership Dues | 9,550.80 |
| 913.00 | Video | 122.70 |
| 913.00 | WE 2023 Annual Campaign | 153.37 |
| 913.00 | WECI Advertising | 301.50 |
| 913.00 | Wine in the Wild Sponsorship | 500.00 |
| 913.00 | YouTube ads 75th Anniversary | 23.68 |
| 913.00 | youtube ads for power your year promo | 14.46 |
| 930.20 | KEC MONTHLY ASSESSMENT | 6,893.96 |

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, 2023

| Account | Description | Amount |
|---------|--|-----------------------------|
| 930.20 | KEC MONTHLY ASSESSMENT | 41,363.76 |
| 930.20 | KEC Monthly Assessment - April 2023 | 6,893.96 |
| 930.20 | KEC Monthly Assessment - February 2023 | 6,893.96 |
| 930.20 | KEC Monthly Assessment - January 2023 | 6,893.78 |
| 930.20 | KEC Monthly Assessment - March 2023 | 6,893.96 |
| 930.20 | KEC Monthly Assessment - May 2023 | 6,893.96 |
| | Total Disallowed Expenses | \$ <u><u>287,776.65</u></u> |

Wheatland Electric Cooperative, Inc.
Workbook B: Disallowed Other Deductions
Year Ending December 31, 2023

| Reference | Sum of Amount |
|--|---------------|
| 18th Annual GB COC Golf Tournament | \$ 300.00 |
| 19th Annual CASA Aution/Fundraiser | 750.00 |
| 2023 GBCC Patron Fund | 250.00 |
| 2023 NORWICH SUMMER FUN | 250.00 |
| 2023 Power the Pantry | 36,252.00 |
| 2023 Rosewood Roots & Wings Foundation | 250.00 |
| 2023 Santa's Workshop | 250.00 |
| 2023-2024 Booster Club Membership Drive | 400.00 |
| 6th Grade Band & Orchestra Shirts | 250.00 |
| After Prom Party | 250.00 |
| CHS 2024 After Prom Donation | 100.00 |
| City of Harper Easter Egg Hunt Donation | 100.00 |
| CKCA Booster Club | 100.00 |
| Clear the Shelters Adoption Sponsors | 200.00 |
| donation City of Caldwell Holiday Lights | 281.51 |
| donation item BCC foundation auction | 15.00 |

Wheatland Electric Cooperative, Inc.
Workbook B: Disallowed Other Deductions
Year Ending December 31, 2023

| Reference | Sum of Amount |
|--|----------------------------|
| donation to Barton CC Foundation auction | 321.74 |
| donation to Brit Spaugh Zoo Wine in Wild | 92.93 |
| donation to ST. Joseph PTO | 50.00 |
| EXHIBITORS ADD-ON PREMIUM 2023 | 400.05 |
| Fleet Management Transaction | 187.90 |
| Food Bank Donation | 1,500.00 |
| GB after prom donations items | 94.29 |
| GB Kids Ag Day Donation | 56.09 |
| Geral Raymond Zorn Memorial | 50.00 |
| gift basket for Conway Springs Fall Fest | 236.46 |
| gift basket St. Joseph School Auction | 52.75 |
| Holiday, Funeral, Jury, Other Paid Time | 29.04 |
| Holy Family School auction donation | 16.25 |
| In memory of George H. Ladison | 50.00 |
| LABOR DISTRIBUTION | 1,004.92 |
| MR Invoice | 1,035.00 |
| MR Invoice Maintenance | - |
| Quarterly Pension Plan Employer Expense | 1.43 |
| Red Shoes and Bunco Too Sponsorship | 250.00 |
| VOID CHECK - WRONG AMOUNT | (5,527.00) |
| water donation for GB Kids Ag Day | 54.80 |
| water donation to City of GB | 366.04 |
| Total Disallowed Deductions | \$ <u><u>40,321.20</u></u> |

Wheatland Electric Cooperative, Inc.
Workbook C: Calculation of Cash Received from G&T and Lenders
Year Ending December 31, 2023

Total Cash Received from G&T and Lenders

| | |
|--|-----------------|
| Cash Received from Retirement of Patronage Capital by Suppliers of Electric Power | \$ 4,111,832.00 |
| Cash Received from Retirement of Patronage Capital by Lenders for Credit Extended to the Electric System | 477,460.00 |
| Total | \$ 4,589,292.00 |

| | |
|--------------------|------------------|
| From Trial Balance | |
| Power Cost - West | \$ 31,511,840.44 |
| Power Cost- East | 16,185,587.79 |
| Total | \$ 47,697,428.23 |

| | |
|-------------------------|-----------------|
| From Trial Balance | |
| Interest Expense - West | \$ 3,422,001.86 |
| Interest Expense - East | 2,863,944.86 |
| Total | \$ 6,285,946.72 |

| | |
|--|-----------------|
| Cash Received from Retirement of Patronage Capital by Suppliers of Electric Power | \$ 1,395,304.11 |
| Cash Received from Retirement of Patronage Capital by Lenders for Credit Extended to the Electric System | 217,535.91 |
| Total | \$ 1,612,840.02 |

Wheatland Electric Cooperative, Inc.
Workbook D: Directly Assigned 34.5 kV Expenses
Year Ending December 31, 2023

| Divison | Account | Total |
|---------|-----------|-----------|
| 3 | 107.20 \$ | - |
| 3 | 108.80 | - |
| 3 | 163.00 | - |
| 3 | 184.10 | - |
| 3 | 184.20 | - |
| 3 | 242.50 | - |
| 3 | 242.51 | - |
| 3 | 242.52 | - |
| 3 | 416.00 | - |
| 3 | 417.10 | - |
| 3 | 426.10 | - |
| 3 | 562.50 | - |
| 3 | 563.00 | 76,650.98 |
| 3 | 563.50 | 47,088.44 |

Wheatland Electric Cooperative, Inc.
Workbook D: Directly Assigned 34.5 kV Expenses
Year Ending December 31, 2023

| Divison | Account | Total |
|---------|---------|-----------------------------|
| 3 | 580.00 | - |
| 3 | 583.00 | - |
| 3 | 584.00 | - |
| 3 | 586.00 | - |
| 3 | 588.00 | - |
| 3 | 592.30 | - |
| 3 | 593.00 | - |
| 3 | 594.00 | - |
| 3 | 595.00 | - |
| 3 | 596.00 | - |
| 3 | 597.00 | - |
| 3 | 903.00 | - |
| 3 | 912.00 | - |
| 3 | 920.00 | - |
| 3 | 932.00 | - |
| | | \$ <u><u>123,739.42</u></u> |

Exhibit JED - 1

Wheatland Electric Cooperative, Inc.
Workbook E: Directly Assigned 34.5 kV Payroll and Overhead
Year Ending December 31, 2023

| Divison | Account | Labor | OH | SEC Dist | Total |
|---------|---------|---------------------|---------------------|--------------------|---------------------|
| 3 | 107.20 | \$ | \$ | \$ | \$ - |
| 3 | 108.80 | | | | - |
| 3 | 163.00 | | | | - |
| 3 | 184.10 | | | | - |
| 3 | 184.20 | | | | - |
| 3 | 242.50 | | | | - |
| 3 | 242.51 | | | | - |
| 3 | 242.52 | | | | - |
| 3 | 416.00 | | | | - |
| 3 | 417.10 | | | | - |
| 3 | 426.10 | | | | - |
| 3 | 562.50 | 31,666.14 | 22,756.77 | 1,415.61 | 55,838.52 |
| 3 | 563.50 | 20,073.16 | 14,258.03 | 726.57 | 35,057.76 |
| 3 | 580.00 | | | | - |
| 3 | 583.00 | | | | - |
| 3 | 584.00 | | | | - |
| 3 | 586.00 | | | | - |
| 3 | 588.00 | | | | - |
| 3 | 592.30 | | | | - |
| 3 | 593.00 | | | | - |
| 3 | 594.00 | | | | - |
| 3 | 595.00 | | | | - |
| 3 | 596.00 | | | | - |
| 3 | 597.00 | | | | - |
| 3 | 903.00 | | | | - |
| 3 | 912.00 | | | | - |
| 3 | 920.00 | | | | - |
| 3 | 932.00 | | | | - |
| | | \$ <u>51,739.30</u> | \$ <u>37,014.80</u> | \$ <u>2,142.18</u> | \$ <u>90,896.28</u> |

Wheatland Electric Cooperative, Inc.
Workbook F: Total East Division Payroll and Overhead
Year Ending December 31, 2023

| Divison | Account | Labor | OH | SEC Dist | Total |
|---------|---------|-----------------|-----------------|---------------|-----------------|
| 3 | 107.20 | \$ 1,585,887.23 | \$ 1,112,739.18 | \$ 107,966.83 | \$ 2,806,593.24 |
| 3 | 107.20 | 282,642.66 | 203,031.76 | 19,702.95 | 505,377.37 |
| 3 | 108.80 | 299,588.71 | 206,776.38 | 19,657.72 | 526,022.81 |
| 3 | 108.80 | 4,154.41 | 3,661.56 | 287.79 | 8,103.76 |
| 3 | 163.00 | 100,416.42 | 87,391.92 | 7,055.13 | 194,863.47 |
| 3 | 163.00 | 4,053.83 | 3,719.88 | 289.30 | 8,063.01 |
| 3 | 184.10 | 7,590.61 | 5,811.87 | 521.10 | 13,923.58 |
| 3 | 184.10 | 6,127.30 | 6,012.11 | 506.89 | 12,646.30 |
| 3 | 184.20 | 39,677.25 | 27,810.64 | 3,084.96 | 70,572.85 |
| 3 | 184.20 | 5,504.31 | 5,416.31 | 464.55 | 11,385.17 |
| 3 | 242.50 | 266,548.36 | - | - | 266,548.36 |
| 3 | 242.51 | 134,511.14 | - | - | 134,511.14 |
| 3 | 242.52 | 192,146.93 | - | (192,146.93) | - |
| 3 | 416.00 | 802.72 | 580.04 | 68.28 | 1,451.04 |
| 3 | 417.10 | 8,954.33 | 7,002.85 | 664.19 | 16,621.37 |
| 3 | 426.10 | 599.16 | 405.76 | 30.47 | 1,035.39 |
| 3 | 562.50 | 31,666.14 | 22,756.77 | 1,415.61 | 55,838.52 |
| 3 | 563.50 | 20,073.16 | 14,258.03 | 726.57 | 35,057.76 |

Wheatland Electric Cooperative, Inc.
Workbook F: Total East Division Payroll and Overhead
Year Ending December 31, 2023

| Divison | Account | Labor | OH | SEC Dist | Total |
|---------|---------|-----------------|-----------------|--------------|-----------------|
| 3 | 580.00 | 34,039.81 | 24,400.16 | 1,798.62 | 60,238.59 |
| 3 | 580.00 | 7,819.51 | 5,720.63 | 432.65 | 13,972.79 |
| 3 | 583.00 | 160,203.97 | 107,075.20 | 7,292.65 | 274,571.82 |
| 3 | 583.00 | 16,253.53 | 16,690.99 | 1,080.86 | 34,025.38 |
| 3 | 584.00 | 105,490.42 | 82,489.24 | 5,809.57 | 193,789.23 |
| 3 | 586.00 | 12,044.91 | 9,405.27 | 673.91 | 22,124.09 |
| 3 | 586.00 | 25,647.32 | 25,656.89 | 1,394.91 | 52,699.12 |
| 3 | 588.00 | 19,312.41 | 7,618.09 | 465.45 | 27,395.95 |
| 3 | 592.30 | 161,947.84 | 125,716.27 | 10,341.93 | 298,006.04 |
| 3 | 593.00 | 174,100.42 | 128,260.48 | 9,938.97 | 312,299.87 |
| 3 | 594.00 | 10,869.18 | 6,731.00 | 296.04 | 17,896.22 |
| 3 | 595.00 | 226.64 | 157.67 | 10.95 | 395.26 |
| 3 | 596.00 | 8,926.22 | 6,957.08 | 661.62 | 16,544.92 |
| 3 | 597.00 | 31,395.81 | 22,365.88 | 1,524.49 | 55,286.18 |
| 3 | 903.00 | 215,697.24 | 158,613.38 | 11,474.25 | 385,784.87 |
| 3 | 903.00 | 75,646.42 | 58,898.44 | 4,024.78 | 138,569.64 |
| 3 | 912.00 | 2,357.27 | 1,614.24 | 113.62 | 4,085.13 |
| 3 | 912.00 | 5,918.99 | 4,463.28 | 286.85 | 10,669.12 |
| 3 | 920.00 | 386,737.86 | 260,806.40 | 20,828.24 | 668,372.50 |
| 3 | 920.00 | 613,812.89 | 416,893.68 | 32,184.63 | 1,062,891.20 |
| 3 | 932.00 | 340.12 | 259.33 | - | 599.45 |
| | | \$ 5,059,733.45 | \$ 3,178,168.66 | \$ 80,930.40 | \$ 8,318,832.51 |

Exhibit JED - 1

Wheatland Electric Cooperative, Inc.
Workbook G: East Division Income Statement
Year Ending December 31, 2023

| ITEM | YEAR-TO-DATE |
|---|----------------------|
| | THIS YEAR (b) |
| 1. Operating Revenue and Patronage Capital | 30,201,787 |
| 2. Power Production Expense | 0 |
| 3. Cost of Purchased Power | 16,185,588 |
| 4. Transmission Expense | 123,739 |
| 5. Regional Market Operations Expense | 0 |
| 6. Distribution Expense - Operation | 798,356 |
| 7. Distribution Expense - Maintenance | 1,365,090 |
| 8. Consumer Accounts Expense | 538,943 |
| 9. Customer Service and Informational Expense | 84,455 |
| 10. Sales Expense | 125,661 |
| 11. Administrative and General Expense | 3,023,244 |
| 12. Total Operation & Maintenance Expense (2 thru 11) | 22,245,075.85 |
| 13. Depreciation & Amortization Expense | 4,189,022 |
| 14. Tax Expense - Property & Gross Receipts | 1,053,957 |
| 15. Tax Expense - Other | 625 |
| 16. Interest on Long-Term Debt | 2,863,945 |
| 17. Interest Charged to Construction (Credit) | 0 |
| 18. Interest Expense - Other | 476,947 |
| 19. Other Deductions | 40,321 |
| 20. Total Cost of Electric Service (12 thru 19) | 30,869,893.10 |
| 21. Patronage Capital & Operating Margins (1 minus 20) | (668,106) |
| 22. Non Operating Margins - Interest | 5,544 |
| 23. Allowance for Funds Used During Construction | 0 |
| 24. Income (Loss) from Equity Investments | 0 |
| 25. Non Operating Margins - Other | 13,900 |
| 26. Generation & Transmission Capital Credits | 0 |
| 27. Other Capital Credits & Patronage Dividends | 130,858 |
| 28. Extraordinary Items | 0 |
| 29. Patronage Capital or Margins (21 thru 28) | (517,805.00) |

Wheatland Electric Cooperative, Inc.
Workbook H: Directly Assigned 34.5 kV Plant Assets
Year Ending December 31, 2023

| Div | Account | Asset | Description | Group | Description | Amount |
|-----|---------|----------|------------------------|-------|-------------------|-----------------|
| 3 | 362 | 36230601 | 2nd & KS | 50 | 34.5kv District 6 | \$ 2,102,915.92 |
| 3 | 362 | 36230602 | Convent | 50 | 34.5kv District 6 | 29,806.43 |
| 3 | 362 | 36230603 | Eisenhower | 50 | 34.5kv District 6 | 3,000.00 |
| 3 | 362 | 36230604 | 24th & Frey | 50 | 34.5kv District 6 | 1,018,181.77 |
| 3 | 362 | 36230605 | Bowling Alley | 50 | 34.5kv District 6 | 32,221.15 |
| 3 | 362 | 36230607 | 281 ByPass | 50 | 34.5kv District 6 | 3,000.00 |
| 3 | 362 | 36230608 | 8th & Madison | 50 | 34.5kv District 6 | 3,000.00 |
| 3 | 362 | 36230610 | Quail Creek Substation | 50 | 34.5kv District 6 | 32,221.15 |
| 3 | 362 | 36230612 | Northwest | 50 | 34.5kv District 6 | 1,341,780.54 |
| 3 | 362 | 36230701 | Harper | 60 | 34.5kv District 7 | 5,571,277.29 |
| 3 | 362 | 36230702 | Milan | 60 | 34.5kv District 7 | 1,186,425.30 |
| 3 | 362 | 36230703 | Caldwell | 60 | 34.5kv District 7 | 100,232.97 |
| 3 | 362 | 36230704 | Conway Springs | 60 | 34.5kv District 7 | 18,107.92 |
| 3 | 362 | 36230705 | Argonia | 60 | 34.5kv District 7 | 19,399.79 |
| 3 | 362 | 36230706 | Rago | 50 | 34.5kv District 6 | 160,078.77 |
| 3 | 362 | 36230707 | Mayfield | 60 | 34.5kv District 7 | 20,475.63 |
| 3 | 362 | 36230709 | North Attica | 60 | 34.5kv District 7 | 30,281.59 |
| 3 | 362 | 36230710 | Bluff City | 60 | 34.5kv District 7 | 12,992.14 |

Wheatland Electric Cooperative, Inc.
Workbook H: Directly Assigned 34.5 kV Plant Assets
Year Ending December 31, 2023

| Div | Account | Asset | Description | Group | Description | Amount |
|-----|---------|----------|-------------|-------|-------------------|------------|
| 3 | 364 | 36430001 | GUY | 50 | 34.5kv District 6 | 10,441.79 |
| 3 | 364 | 36430001 | GUY | 60 | 34.5kv District 7 | 49,960.72 |
| 3 | 364 | 36430002 | ANCHOR | 50 | 34.5kv District 6 | 12,967.60 |
| 3 | 364 | 36430002 | ANCHOR | 60 | 34.5kv District 7 | 67,219.71 |
| 3 | 364 | 36430003 | CROSSARM | 50 | 34.5kv District 6 | 82,981.10 |
| 3 | 364 | 36430003 | CROSSARM | 60 | 34.5kv District 7 | 448,136.88 |
| 3 | 364 | 36430007 | POLE 35' | 50 | 34.5kv District 6 | 471.88 |
| 3 | 364 | 36430007 | POLE 35' | 60 | 34.5kv District 7 | 50,589.83 |
| 3 | 364 | 36430008 | POLE 40' | 50 | 34.5kv District 6 | 14,017.43 |
| 3 | 364 | 36430008 | POLE 40' | 60 | 34.5kv District 7 | 404,651.22 |
| 3 | 364 | 36430009 | POLE 45' | 50 | 34.5kv District 6 | 82,818.61 |
| 3 | 364 | 36430009 | POLE 45' | 60 | 34.5kv District 7 | 899,035.75 |

Wheatland Electric Cooperative, Inc.
Workbook H: Directly Assigned 34.5 kV Plant Assets
Year Ending December 31, 2023

| Div | Account | Asset | Description | Group | Description | Amount |
|-----|---------|----------|----------------|-------|-------------------|--------------|
| 3 | 364 | 36430010 | POLE 50' | 50 | 34.5kv District 6 | 213,196.28 |
| 3 | 364 | 36430010 | POLE 50' | 60 | 34.5kv District 7 | 1,181,366.68 |
| 3 | 364 | 36430011 | POLE 55' | 50 | 34.5kv District 6 | 86,085.40 |
| 3 | 364 | 36430011 | POLE 55' | 60 | 34.5kv District 7 | 82,793.73 |
| 3 | 364 | 36430012 | POLE 60' | 50 | 34.5kv District 6 | 4,538.11 |
| 3 | 364 | 36430012 | POLE 60' | 60 | 34.5kv District 7 | 20,691.77 |
| 3 | 364 | 36430013 | POLE 65' | 50 | 34.5kv District 6 | 22,638.50 |
| 3 | 364 | 36430013 | POLE 65' | 60 | 34.5kv District 7 | 6,547.32 |
| 3 | 364 | 36430014 | POLE 70' | 50 | 34.5kv District 6 | 17,995.47 |
| 3 | 364 | 36430014 | POLE 70' | 60 | 34.5kv District 7 | 3,584.82 |
| 3 | 364 | 36430022 | 45' STEEL POLE | 60 | 34.5kv District 7 | 25,096.23 |
| 3 | 364 | 36430023 | 60' STEEL POLE | 60 | 34.5kv District 7 | 6,279.29 |
| 3 | 364 | 36430024 | 65' STEEL POLE | 60 | 34.5kv District 7 | 4,182.70 |

Wheatland Electric Cooperative, Inc.
Workbook H: Directly Assigned 34.5 kV Plant Assets
Year Ending December 31, 2023

| Div | Account | Asset | Description | Group | Description | Amount |
|-----|---------|----------|-------------------------|-------|-------------------|------------|
| 3 | 365 | 36530001 | GROUND | 50 | 34.5kv District 6 | 15,161.73 |
| 3 | 365 | 36530001 | GROUND | 60 | 34.5kv District 7 | 298,379.80 |
| 3 | 365 | 36530002 | INSULATOR STING 15KV | 50 | 34.5kv District 6 | (138.15) |
| 3 | 365 | 36530004 | CUTOUT | 60 | 34.5kv District 7 | 25,797.43 |
| 3 | 365 | 36530005 | LIGHTING ARRESTER | 60 | 34.5kv District 7 | 33,519.53 |
| 3 | 365 | 36530012 | # 4/0 ACSR | 50 | 34.5kv District 6 | 221,431.25 |
| 3 | 365 | 36530012 | # 4/0 ACSR | 60 | 34.5kv District 7 | 249,924.18 |
| 3 | 365 | 36530013 | # 2/0 ACSR | 60 | 34.5kv District 7 | 903,273.07 |
| 3 | 365 | 36530014 | # 1/0 ACSR | 50 | 34.5kv District 6 | 29,888.96 |
| 3 | 365 | 36530014 | # 1/0 ACSR | 60 | 34.5kv District 7 | 403,224.80 |
| 3 | 365 | 36530035 | BRACKET CUTOUT 3 PHASE | 60 | 34.5kv District 7 | 3,309.25 |
| 3 | 365 | 36530036 | 27 & 30 KV ARRESTER | 50 | 34.5kv District 6 | 14,847.32 |
| 3 | 365 | 36530037 | SWITCH LDBK 3-PH 34.5KV | 50 | 34.5kv District 6 | 11,095.45 |
| 3 | 365 | 36530038 | INSULATOR STRING 34.5KV | 50 | 34.5kv District 6 | 46,603.60 |
| 3 | 365 | 36530038 | INSULATOR STRING 34.5KV | 60 | 34.5kv District 7 | 158,259.47 |
| 3 | 365 | 36530058 | CONDUCTOR T2 1/0 | 60 | 34.5kv District 7 | 149,203.76 |
| 3 | 365 | 36530066 | 2 TPX | 60 | 34.5kv District 7 | 786.82 |

Wheatland Electric Cooperative, Inc.
Workbook H: Directly Assigned 34.5 kV Plant Assets
Year Ending December 31, 2023

| Div | Account | Asset | Description | Group | Description | Amount |
|-----|---------|----------|--------------------------------|-------|-------------------|--------------------------------|
| 3 | 367 | 36730006 | # 1/0 PRIMARY EPR URD | 50 | 34.5kv District 6 | 763.33 |
| 3 | 367 | 36730006 | # 1/0 PRIMARY EPR URD | 60 | 34.5kv District 7 | 2,396.04 |
| 3 | 367 | 36730015 | ARRESTER ELBOW 27KV | 50 | 34.5kv District 6 | 3,615.95 |
| 3 | 367 | 36730018 | TERMINATOR 15KV | 60 | 34.5kv District 7 | 24,936.24 |
| 3 | 367 | 36730029 | GROUNDS | 60 | 34.5kv District 7 | 1,177.38 |
| 3 | 367 | 36730032 | TERMINATOR 35KV | 50 | 34.5kv District 6 | 6,461.33 |
| 3 | 367 | 36730055 | CABLE SUPPORT BRKT | 60 | 34.5kv District 7 | 463.36 |
| 3 | 367 | 36730062 | #2 QUAD DB | 60 | 34.5kv District 7 | 31.64 |
| 3 | 368 | 36830055 | CAPACITOR 19920 VOLT (34.5) | 60 | 34.5kv District 7 | 26,021.58 |
| 3 | 368 | 36830062 | 38kv 1200amp typeV cir breaker | 60 | 34.5kv District 7 | 30,609.23 |
| 3 | 369 | 36930002 | METER LOOP | 60 | 34.5kv District 7 | 860.96 |
| 3 | 369 | 36930004 | 3-PHASE TRANSOCKET | 60 | 34.5kv District 7 | 5,718.25 |
| | | | Total 34.5 kV Assets | | | \$ <u><u>18,151,310.74</u></u> |

Wheatland Electric Cooperative, Inc.
Workbook I: Trial Balance - Plant Accounts East Division
Year Ending December 31, 2023

| Account | Acct. | Descr | Debit | Credit |
|---------|-------|--|-----------------|--------|
| 114.00 | 114 | Electric Plant Amort | \$ 5,409,446.27 | \$ |
| 350.00 | 350 | LAND & LAND RIGHTS-TRANSMISSION | 58,101.15 | - |
| 355.00 | 355 | POLES & FIXTURES | 3,951,622.85 | - |
| 356.00 | 356 | OVERHEAD CONDUCTORS & DEVICES | 6,972,733.84 | - |
| 360.00 | 360 | LAND & LAND RIGHTS-DISTRIBUTION | 65,835.18 | - |
| 362.00 | 362 | STATION EQUIPMENT-DISTRIBUTION | 26,791,005.52 | - |
| 362.01 | 362 | Substation - SCADA | 264,951.18 | - |
| 364.00 | 364 | POLES, TOWERS & FIXTURES | 22,884,399.06 | - |
| 364.20 | 364 | POLE TREATMENT | 207,176.78 | - |
| 365.00 | 365 | OVERHEAD CONDUCTORS & DEVICES | 22,229,799.63 | - |
| 367.00 | 367 | UNDERGROUND CONDUCTORS & DEVICES | 6,952,419.72 | - |
| 368.00 | 368 | LINE TRANSFORMERS | 9,984,281.30 | - |
| 369.00 | 369 | SERVICES | 3,981,989.77 | - |
| 370.00 | 370 | METERS | 119,011.47 | - |
| 370.05 | 370 | METERS-AMI | 3,149,988.39 | - |
| 371.00 | 371 | MERCURY VAPOR LIGHTS-INSTALL ON CONS PRE | 2,214,632.35 | - |
| 371.11 | 371 | LED Street Lights | 6,103.02 | - |
| 389.00 | 389 | LAND AND LAND RIGHTS | 519,253.54 | - |

Wheatland Electric Cooperative, Inc.
Workbook I: Trial Balance - Plant Accounts East Division
Year Ending December 31, 2023

| Account | Acct. | Descr | Debit | Credit |
|---------|-------|--|--------------------------|-------------|
| 390.00 | 390 | STRUCTURES & IMPROVEMENTS | 6,623,647.07 | - |
| 391.00 | 391 | OFFICE FURNITURE & FIXTURES | 273,917.16 | - |
| 391.10 | 391 | SYSTEMS SOFTWARE | 18,950.77 | - |
| 391.15 | 391 | GENERATORS | 46,429.41 | - |
| 391.20 | 391 | COMPUTER HARDWARE (AS400/SERVERS/ETC) | 323,324.22 | - |
| 391.25 | 391 | DAFFRON SOFTWARE | 8,900.64 | - |
| 391.30 | 391 | PC HARDWARE & EQUIPMENT | 190,027.62 | - |
| 391.40 | 391 | ITRON HARDWARE | 25,862.79 | - |
| 391.50 | 391 | NETWORK & VOICE LINK HARDWARE (PHONES) | 154,184.95 | - |
| 391.80 | 391 | MAPPING HARDWARE (PCS, ETC.) | 28,986.59 | - |
| 391.90 | 391 | STAKING EQUIPMENT (PCS, ETC.) | 31,181.38 | - |
| 392.00 | 392 | TRANSPORTATION EQUIPMENT | 1,018,948.68 | - |
| 393.00 | 393 | STORES EQUIPMENT | 434,794.13 | - |
| 394.00 | 394 | TOOLS, SHOP & GARAGE EQUIPMENT | 121,529.73 | - |
| 395.00 | 395 | LABORATORY EQUIPMENT | 221,281.75 | - |
| 396.00 | 396 | POWER OPERATED EQUIPMENT | 4,252,771.39 | - |
| 397.00 | 397 | COMMUNICATIONS EQUIPMENT | 693,250.72 | - |
| 398.00 | 398 | EQUIPMENT-MISCELLANEOUS | 81,796.92 | - |
| 399.26 | 399 | WIRELESS--TOWERS | 1,104,651.86 | - |
| 399.28 | 399 | WIRELESS ASSETS--OTHER | 104,121.58 | - |
| | | Total | \$ <u>131,521,310.38</u> | \$ <u>-</u> |

Wheatland Electric Cooperative, Inc.
Workbook J: Trial Balance - Accumulated Depreciation Accounts East Division
Year Ending December 31, 2023

| Account | Acct. | Description | Debit | Credit |
|---------|-------|--|----------------------|-------------------------|
| 108.50 | 108 | ACCUMULATED DEPRECIATION-TRANSMISSION PL | \$ - | \$ 9,088,246.14 |
| 108.60 | 108 | ACCUMULATED DEPRECIATION-DISTRIBUTION PL | - | 23,950,888.05 |
| 108.70 | 108 | ACCUMULATED DEPRECIATION-GENERAL PLANT-S | - | 6,937,988.53 |
| 108.71 | 108 | ACCUMULATED DEPRECIATION-GENERAL PLANT-S | - | - |
| 108.72 | 108 | ACCUMULATED DEPRECIATION-FURNITURE & FIX | - | 775,583.30 |
| 108.73 | 108 | ACCUMULATED DEPRECIATION-TRANSPORTATION | - | - |
| 108.74 | 108 | ACCUMULATED DEPRECIATION-STORES EQUIPMEN | - | - |
| 108.75 | 108 | ACCUMULATED DEPRECIATION-SHOP EQUIPMENT | - | - |
| 108.76 | 108 | ACCUMULATED DEPRECIATION-LABORATORY EQUI | - | - |
| 108.77 | 108 | ACCUMULATED DEPRECIATION-COMMUNICATIONS | - | - |
| 108.78 | 108 | ACCUMULATED DEPRECIATION-MISCELLANEOUS E | - | - |
| 108.79 | 108 | ACCUMULATED DEPRECIATION-LARGE TOOLS | - | - |
| 108.80 | 108 | RETIREMENT WORK IN PROGRESS | 202,754.34 | - |
| 108.99 | 108 | RETIREMENT WORK IN PROGRESS--OTHER | 481.97 | - |
| 115.00 | 115 | ACCUMULATED DEPRECIATION-ELECT. PLANT AC | | 2,848,880.34 |
| | | | <u>\$ 203,236.31</u> | <u>\$ 43,601,586.36</u> |

Wheatland Electric Cooperative, Inc.
Workbook K: Directly Assigned 34.5 kV Plant Assets Accumulated Depreciation
Year Ending December 31, 2023

| Div | Account | Asset | Description | Group | Description | Amount |
|-----|---------|----------|------------------------|-------|-------------------|--------------|
| 3 | 362 | 36230601 | 2nd & KS | 50 | 34.5kv District 6 | 383,624.87 |
| 3 | 362 | 36230602 | Convent | 50 | 34.5kv District 6 | 13,909.67 |
| 3 | 362 | 36230603 | Eisenhower | 50 | 34.5kv District 6 | 1,400.00 |
| 3 | 362 | 36230604 | 24th & Frey | 50 | 34.5kv District 6 | 475,151.49 |
| 3 | 362 | 36230605 | Bowling Alley | 50 | 34.5kv District 6 | 15,036.54 |
| 3 | 362 | 36230607 | 281 ByPass | 50 | 34.5kv District 6 | 1,400.00 |
| 3 | 362 | 36230608 | 8th & Madison | 50 | 34.5kv District 6 | 1,400.00 |
| 3 | 362 | 36230610 | Quail Creek Substation | 50 | 34.5kv District 6 | 15,036.54 |
| 3 | 362 | 36230612 | Northwest | 50 | 34.5kv District 6 | 626,164.25 |
| 3 | 362 | 36230701 | Harper | 60 | 34.5kv District 7 | 2,599,929.40 |
| 3 | 362 | 36230702 | Milan | 60 | 34.5kv District 7 | 553,665.14 |
| 3 | 362 | 36230703 | Caldwell | 60 | 34.5kv District 7 | 46,775.39 |
| 3 | 362 | 36230704 | Conway Springs | 60 | 34.5kv District 7 | 8,450.36 |
| 3 | 362 | 36230705 | Argonia | 60 | 34.5kv District 7 | 9,053.24 |
| 3 | 362 | 36230706 | Rago | 50 | 34.5kv District 6 | 74,703.43 |
| 3 | 362 | 36230707 | Mayfield | 60 | 34.5kv District 7 | 9,555.29 |
| 3 | 362 | 36230709 | North Attica | 60 | 34.5kv District 7 | 14,131.41 |
| 3 | 362 | 36230710 | Bluff City | 60 | 34.5kv District 7 | 6,063.00 |

Wheatland Electric Cooperative, Inc.
Workbook K: Directly Assigned 34.5 kV Plant Assets Accumulated Depreciation
Year Ending December 31, 2023

| Div | Account | Asset | Description | Group | Description | Amount |
|-----|---------|----------|-------------|-------|-------------------|------------|
| 3 | 364 | 36430001 | GUY | 50 | 34.5kv District 6 | 4,872.84 |
| 3 | 364 | 36430001 | GUY | 60 | 34.5kv District 7 | 23,315.00 |
| 3 | 364 | 36430002 | ANCHOR | 50 | 34.5kv District 6 | 6,051.55 |
| 3 | 364 | 36430002 | ANCHOR | 60 | 34.5kv District 7 | 31,369.20 |
| 3 | 364 | 36430003 | CROSSARM | 50 | 34.5kv District 6 | 38,724.51 |
| 3 | 364 | 36430003 | CROSSARM | 60 | 34.5kv District 7 | 209,130.54 |
| 3 | 364 | 36430007 | POLE 35' | 50 | 34.5kv District 6 | 220.21 |
| 3 | 364 | 36430007 | POLE 35' | 60 | 34.5kv District 7 | 23,608.59 |
| 3 | 364 | 36430008 | POLE 40' | 50 | 34.5kv District 6 | 6,541.47 |
| 3 | 364 | 36430008 | POLE 40' | 60 | 34.5kv District 7 | 188,837.24 |
| 3 | 364 | 36430009 | POLE 45' | 50 | 34.5kv District 6 | 38,648.68 |
| 3 | 364 | 36430009 | POLE 45' | 60 | 34.5kv District 7 | 419,550.02 |

Wheatland Electric Cooperative, Inc.
Workbook K: Directly Assigned 34.5 kV Plant Assets Accumulated Depreciation
Year Ending December 31, 2023

| Div | Account | Asset | Description | Group | Description | Amount |
|-----|---------|----------|----------------|-------|-------------------|------------|
| 3 | 364 | 36430010 | POLE 50' | 50 | 34.5kv District 6 | 99,491.60 |
| 3 | 364 | 36430010 | POLE 50' | 60 | 34.5kv District 7 | 551,304.45 |
| 3 | 364 | 36430011 | POLE 55' | 50 | 34.5kv District 6 | 40,173.19 |
| 3 | 364 | 36430011 | POLE 55' | 60 | 34.5kv District 7 | 38,637.07 |
| 3 | 364 | 36430012 | POLE 60' | 50 | 34.5kv District 6 | 2,117.78 |
| 3 | 364 | 36430012 | POLE 60' | 60 | 34.5kv District 7 | 9,656.16 |
| 3 | 364 | 36430013 | POLE 65' | 50 | 34.5kv District 6 | 10,564.63 |
| 3 | 364 | 36430013 | POLE 65' | 60 | 34.5kv District 7 | 3,055.42 |
| 3 | 364 | 36430014 | POLE 70' | 50 | 34.5kv District 6 | 8,397.89 |
| 3 | 364 | 36430014 | POLE 70' | 60 | 34.5kv District 7 | 1,672.92 |
| 3 | 364 | 36430022 | 45' STEEL POLE | 60 | 34.5kv District 7 | 11,711.57 |
| 3 | 364 | 36430023 | 60' STEEL POLE | 60 | 34.5kv District 7 | 2,930.34 |
| 3 | 364 | 36430024 | 65' STEEL POLE | 60 | 34.5kv District 7 | 1,951.93 |

Wheatland Electric Cooperative, Inc.
Workbook K: Directly Assigned 34.5 kV Plant Assets Accumulated Depreciation
Year Ending December 31, 2023

| Div | Account | Asset | Description | Group | Description | Amount |
|-----|---------|----------|-------------------------|-------|-------------------|------------|
| 3 | 365 | 36530001 | GROUND | 50 | 34.5kv District 6 | 7,075.47 |
| 3 | 365 | 36530001 | GROUND | 60 | 34.5kv District 7 | 139,243.91 |
| 3 | 365 | 36530002 | INSULATOR STING 15KV | 50 | 34.5kv District 6 | (64.47) |
| 3 | 365 | 36530004 | CUTOUT | 60 | 34.5kv District 7 | 12,038.80 |
| 3 | 365 | 36530005 | LIGHTING ARRESTER | 60 | 34.5kv District 7 | 15,642.45 |
| 3 | 365 | 36530012 | # 4/0 ACSR | 50 | 34.5kv District 6 | 103,334.58 |
| 3 | 365 | 36530012 | # 4/0 ACSR | 60 | 34.5kv District 7 | 116,631.28 |
| 3 | 365 | 36530013 | # 2/0 ACSR | 60 | 34.5kv District 7 | 421,527.43 |
| 3 | 365 | 36530014 | # 1/0 ACSR | 50 | 34.5kv District 6 | 13,948.18 |
| 3 | 365 | 36530014 | # 1/0 ACSR | 60 | 34.5kv District 7 | 188,171.57 |
| 3 | 365 | 36530035 | BRACKET CUTOUT 3 PHASE | 60 | 34.5kv District 7 | 1,544.32 |
| 3 | 365 | 36530036 | 27 & 30 KV ARRESTER | 50 | 34.5kv District 6 | 6,928.75 |
| 3 | 365 | 36530037 | SWITCH LDBK 3-PH 34.5KV | 50 | 34.5kv District 6 | 5,177.88 |
| 3 | 365 | 36530038 | INSULATOR STRING 34.5KV | 50 | 34.5kv District 6 | 21,748.35 |
| 3 | 365 | 36530038 | INSULATOR STRING 34.5KV | 60 | 34.5kv District 7 | 73,854.42 |
| 3 | 365 | 36530058 | CONDUCTOR T2 1/0 | 60 | 34.5kv District 7 | 69,628.42 |
| 3 | 365 | 36530066 | 2 TPX | 60 | 34.5kv District 7 | 367.18 |

Wheatland Electric Cooperative, Inc.
Workbook K: Directly Assigned 34.5 kV Plant Assets Accumulated Depreciation
Year Ending December 31, 2023

| Div | Account | Asset | Description | Group | Description | Amount |
|-----|---------|----------|--------------------------------|-------|-------------------|-----------------|
| 3 | 367 | 36730006 | # 1/0 PRIMARY EPR URD | 50 | 34.5kv District 6 | 356.22 |
| 3 | 367 | 36730006 | # 1/0 PRIMARY EPR URD | 60 | 34.5kv District 7 | 1,118.15 |
| 3 | 367 | 36730015 | ARRESTER ELBOW 27KV | 50 | 34.5kv District 6 | 1,687.44 |
| 3 | 367 | 36730018 | TERMINATOR 15KV | 60 | 34.5kv District 7 | 11,636.91 |
| 3 | 367 | 36730029 | GROUNDS | 60 | 34.5kv District 7 | 549.44 |
| 3 | 367 | 36730032 | TERMINATOR 35KV | 50 | 34.5kv District 6 | 3,015.29 |
| 3 | 367 | 36730055 | CABLE SUPPORT BRKT | 60 | 34.5kv District 7 | 216.23 |
| 3 | 367 | 36730062 | #2 QUAD DB | 60 | 34.5kv District 7 | 14.77 |
| 3 | 368 | 36830055 | CAPACITOR 19920 VOLT (34.5) | 60 | 34.5kv District 7 | 12,140.00 |
| 3 | 368 | 36830062 | 38kv 1200amp typeV cir breaker | 60 | 34.5kv District 7 | 14,280.31 |
| 3 | 369 | 36930002 | METER LOOP | 60 | 34.5kv District 7 | 401.67 |
| 3 | 369 | 36930004 | 3-PHASE TRANSOCKET | 60 | 34.5kv District 7 | 2,667.77 |
| | | | Total 34.5 kV Assets | | | \$ 7,872,867.53 |

Wheatland Electric Cooperative, Inc.
Workbook L: Trial Balance - Depreciation Expense Accounts East Division
Year Ending December 31, 2023

| Account | Description | Debit | Credit |
|---------|--|------------------------|-------------|
| 403.10 | DEPRECIATION EXPENSE (COLORADO) | \$ - | \$ - |
| 403.25 | DEPRECIATION EXPENSE (WIRELESS) | - | - |
| 403.30 | DEPRECIATION EXPENSE--WATER WORKS | - | - |
| 403.50 | DEPRECIATION EXPENSE (TRANSMISSION PLANT | 57,082.44 | - |
| 403.60 | DEPRECIATION EXPENSE (DISTRIBUTION PLANT | 3,457,869.67 | - |
| 403.70 | DEPRECIATION EXPENSE (GENERAL PLANT) | 434,325.75 | - |
| 406.00 | Amort of Elect Plant Adj | 239,743.89 | - |
| | Total | <u>\$ 4,189,021.75</u> | <u>\$ -</u> |

Wheatland Electric Cooperative, Inc.
Workbook M: Principal Payments - East Division
Year Ending December 31, 2023

| | Principal Payment |
|---|-------------------------------|
| Total Eastern Division Principal Payments | \$ <u><u>2,681,957.52</u></u> |

EDUCATION:

M.B.A., Business Administration, University of Central Oklahoma
B.B.A., University of Central Oklahoma

PROFESSIONAL CERTIFICATION:

Certified Public Account - Oklahoma

EXPERIENCE RECORD:

2019-Present – C.H. Guernsey & Company, Oklahoma City, OK
Rate Analyst
2014-2019 – Love’s Travel Stops
Indirect Tax Analyst
Supervisor of Wholesale Inventory
Staff Accountant

PERTINENT EXPERIENCE FOR THE PROJECT:

Mr. Dan has over 5 years of accounting and analytical experience. Starting at Guernsey in June of 2019, he has assisted on multiple Cost of Service Studies as well as an energy efficiency study and other miscellaneous projects. Prior to Guernsey, he performed a variety of roles at Love’s Travel Stops. Most recently, he worked as an Indirect Tax Analyst where he filed multiple types of tax returns for 4 of Love’s different companies. Prior to that, he was the Supervisor of Wholesale Inventory, which involved reconciling terminal fuel reports with internal accounting records and investigating discrepancies. His initial role at Love’s was as a Staff Accountant where he analyzed daily fuel margins for over 400 locations.

Cost of Service Studies:

Central New Mexico Electric Cooperative 2019
Choctaw Electric Cooperative 2019
Grayson-Collin Electric Cooperative 2019
MidSouth Electric Cooperative 2019
Mountrail-Williams Electric Cooperative 2019
Wheatland Electric Cooperative, Inc. 2019
Y-W Electric Association 2019
Wyrulec Company 2019

Medina Electric Cooperative, Inc. 2019

City of Kingfisher 2019

High Plains Electric Cooperative 2019

Trico 2019

Southwest Mississippi Electric Cooperative 2019

Northwest Electric Cooperative 2019

Intercounty Electric Cooperative 2019

Logan County Electric Cooperative 2019

First Electric Cooperative 2019

Farmers Electric Cooperative 2020

Canadian Valley Electric Cooperative 2020

Vigilante Electric Cooperative 2020

Jemez Mountains Electric Cooperative 2019

Nueces Electric Cooperative 2020

San Patricio Electric Cooperative 2020

Southeastern Electric Cooperative 2019

Rita Balance Electric Cooperative 2020

Garkane Electric Cooperative 2020

Oklahoma Electric Cooperative 2020

Lane-Scott Electric Cooperative 2020

Deep East Electric Cooperative 2020

CMS Electric 2020

Victoria Electric Cooperative 2020

Cookson Hills Electric Cooperative 2020

Ozarks Electric Cooperative 2020

Jemez Electric Cooperative 2021

Nueces Electric Cooperative 2021
Surrey Yadkin Electric Cooperative 2021
Deep East Electric Cooperative 2020
Deaf Smith Electric Cooperative 2021
WIN Energy Electric Cooperative 2021
San Patricio 2021 Capital Credit Study
Mountain View Electric Cooperative 2021
Canadian Valley Electric Cooperative 2021
Bandera Electric Cooperative 2021
Continental Divide Electric Cooperative 2022
Medina Electric Cooperative 2021
Highwest Electric Cooperative 2022
Peoples Electric Cooperative 2022
Cimarron Electric Cooperative 2022
Lighthouse Electric Cooperative 2022
Farmers Electric (New Mexico) 2022
Central Rural Electric Cooperative 2022
Niobrara Electric Cooperative 2022
Cotton Electric Cooperative 2022
Intercounty Electric Cooperative 2022
CVEC 2023
SLEMCO 2022
Southwest Electric Cooperative 2023
Lane-Scott Electric Cooperative 2023
PGE TO21 Rate Filing 2023-2024
Jackson EMC 2023
Pearl River Valley EPA 2023
Heartland Electric 2023
Dawson Power 2023

Cookson Hills 2023

Southwest Rural 2023

Concho Valley Electric 2023

Exhibit JED - 3

| Revenue Requirement and Rate Calculation | | | | | | | | | |
|--|--|--------------------------|------------------|--------------------------|--------|-------------------|------|-----------------|-------------------------|
| (a) | (b) | (c) | (d) | (e) | (f) | (g) | (h) | Exhibit JED - 3 | |
| | | Unadjusted Historical | | FBR Unpopulated Template | | Allocation Factor | | Exhibit JED - 3 | |
| Line No | Description | Source | Test Year [2023] | No. | Amount | Test Year [2023] | Name | Factor | FBR Revenue Requirement |
| | | | | Source: WP2 | | Source: WP3 | | | |
| 1 | Operating Expenses | | | | | | | | |
| 2 | Power Production Expense | WP1, L35, Col (d \$ | - | | \$ | - | | 0.000000 | \$ - |
| 3 | Cost of Purchased Power | WP1, L36, Col (d \$ | - | | \$ | - | | 0.000000 | \$ - |
| 4 | Transmission O&M | WP1, L37, Col (d \$ | - | | \$ | - | DOM1 | #DIV/0! | #DIV/0! |
| 5 | Distribution Expense-Operation | WP1, L38, Col (d \$ | - | | \$ | - | DOM2 | #DIV/0! | #DIV/0! |
| 6 | Distribution Expense-Maintenance | WP1, L39, Col (d \$ | - | | \$ | - | DOM3 | #DIV/0! | #DIV/0! |
| 7 | Consumer Accounts Expense | WP1, L40, Col (d \$ | - | | \$ | - | DOM4 | #DIV/0! | #DIV/0! |
| 8 | Customer Service and Informational Expense | WP1, L41, Col (d \$ | - | | \$ | - | DOM5 | #DIV/0! | #DIV/0! |
| 9 | Sales Expense | WP1, L42, Col (d \$ | - | | \$ | - | DOM6 | #DIV/0! | #DIV/0! |
| 10 | Administration & General | WP1, L43, Col (d \$ | - | [1] | \$ | - | DOM7 | #DIV/0! | #DIV/0! |
| 11 | Total O&M Expense | Sum (L2:L10) | | | \$ | - | | | #DIV/0! |
| 12 | Depreciation and Amortization | WP1, L44, Col (d \$ | - | | \$ | - | NP | #DIV/0! | #DIV/0! |
| 13 | Property Tax | WP1, L49, Col (d \$ | - | | \$ | - | NP | #DIV/0! | #DIV/0! |
| 14 | Other Taxes | WP1, L50, Col (d \$ | - | | \$ | - | NP | #DIV/0! | #DIV/0! |
| 15 | L.T. Interest | WP1, L51, Col (d \$ | - | | \$ | - | NP | #DIV/0! | #DIV/0! |
| 16 | Interest Charged to Construction - Credit | WP1, L52, Col (d \$ | - | | \$ | - | NP | #DIV/0! | #DIV/0! |
| 17 | Interest-Other | WP1, L53, Col (d \$ | - | | \$ | - | NP | #DIV/0! | #DIV/0! |
| 18 | Other Deductions | WP1, L54, Col (d \$ | - | [2] | \$ | - | NP | #DIV/0! | #DIV/0! |
| 19 | Total Cost of Electric Service | | | | | | | | #DIV/0! |
| 20 | | | | | | | | | |
| 21 | Margin Requirement | | | | | | | | |
| 22 | Principal Payments | WP1, L68, Col (d \$ | - | | \$ | - | 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, L70, Col (d) | | | | | | 1.75 | 1.75 |
| 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) | | | | | | - | kW |
| 33 | Resultant Unit Rate | L31 / L32 | | | | | | #DIV/0! | /KW-mo |

Exhibit JED - 3

Exhibit JED - 3

| WP-1 | | | | Amount | | Notes | |
|---------|--|---------------------------|-----|--------------------------------|--------------------------|-------|-------------------------|
| Line No | Description | Source (b) | (c) | (d) | (e) | (f) | |
| 1 | A. Net Plant in Service | | | As of December 31, 2023 | | | |
| 2 | | | | | | | |
| 3 | 1. Facilities Used to Provide Local Access Delivery Service | | | Plant in Service | Accum. Res. for Depr. | | |
| 4 | Transmission Facilities | Trial Balance | | | | | |
| 5 | 350 Land and land Rights | Trial Balance | | \$ - | | | 350 |
| 6 | 352 Structures and Improvements | Trial Balance | | \$ - | | | 352 |
| 7 | 353 Station Equipment | Trial Balance | | \$ - | | | 353 |
| 8 | 355 Poles and Fixtures | Trial Balance | | \$ - | | | 355 |
| 9 | 356 O.H. Conductors and Devices | Trial Balance | | \$ - | | | 356 |
| 10 | 358 U.G. Conductors and Devices | Trial Balance | | \$ - | | | 358 |
| 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 | | 360 34.5 kVA Facilities |
| 14 | 361 Structures and Improvements | Company Direct Assessment | | - | N/A | | 361 34.5 kVA Facilities |
| 15 | 362 Station Equipment | Company Direct Assessment | | - | - | | 362 34.5 kVA Facilities |
| 16 | 364 Poles, Towers, and Fixtures | Company Direct Assessment | | - | - | | 364 34.5 kVA Facilities |
| 17 | 365 Overhead Conductors and Devices | Company Direct Assessment | | - | - | | 365 34.5 kVA Facilities |
| 18 | 367 Underground Conductors and Devices | Company Direct Assessment | | - | - | | 367 34.5 kVA Facilities |
| 19 | 368 Line Transformers | Company Direct Assessment | | - | - | | 368 34.5 kVA Facilities |
| 20 | 369 Services | Company Direct Assessment | | - | - | | 369 34.5 kVA Facilities |
| 21 | 370 Meters | Company Direct Assessment | | - | - | | 370 34.5 kVA Facilities |
| 22 | Subtotal | Sum(L13:L21) | | \$ - | \$ - | | |
| 23 | Total | L11 + L22 | | \$ - | \$ - | | GL acct 108.5 |
| 24 | | | | | | | |
| 25 | 2. All Facilities | | | | | | |
| 26 | 114 Electric Plant Amort | Trial Balance | | \$ - | \$ - | | GL acct 115.0 |
| 27 | 350-359 Transmission Plant | Trial Balance | | \$ - | \$ - | | GL acct 108.5 |
| 28 | 360 - 373 Distribution Plant | Trial Balance | | \$ - | \$ - | | GL acct. 108.6, 108.61 |
| 29 | 389-399 General Plant | Trial Balance | | \$ - | \$ - | | GL acct. 108.7-108.78 |
| 30 | Total | | | \$ - | \$ - | | All Plant |
| 31 | | | | | | | All Plant |
| 32 | | | | | | | All Plant |
| 33 | | | | | | | All Plant |

Exhibit JED - 3

| WP-1 Cont Line No | Source (b) | (c) | Amount (d) | (e) | Notes (f) | Exhibit JED - 3 |
|----------------------|--|---------------------------|---------------------------|-----|--------------------------------|--------------------------|
| 34 | B. Operating Expenses | | Historical Test Year 2023 | | | |
| 35 | All East Division | | | | | |
| 36 | Power Production Expense | Statement of Operations | \$ - | | | All East Division |
| 37 | Cost of Purchased Power | Statement of Operations | \$ - | | | All East Division |
| 38 | Transmission O&M | Statement of Operations | \$ - | | | All East Division |
| 39 | Distribution Expense-Operation | Statement of Operations | \$ - | | | All East Division |
| 40 | Distribution Expense-Maintenance | Statement of Operations | \$ - | | | All East Division |
| 41 | Consumer Accounts Expense | Statement of Operations | \$ - | | | All East Division |
| 42 | Customer Service and Informational Expense | Statement of Operations | \$ - | | | All East Division |
| 43 | Sales Expense | Statement of Operations | \$ - | | | All East Division |
| 44 | Administrative and General | Statement of Operations | \$ - | | | All East Division |
| 45 | Depreciation and Amortization | Statement of Operations | \$ - | | | All East Division |
| 46 | Depreciation Expense - Distribution | Trial Balance | \$ - | | | All East Division |
| 47 | Depreciation Expense - Transmission | Trial Balance | \$ - | | | All East Division |
| 48 | Depreciation Expense - General Plant & Amort of Elec Plant | Trial Balance | \$ - | | | All East Division |
| 49 | Amortization of AP (booked within Depreciation Expense) | Trial Balance | \$ - | | | All East Division |
| 50 | Property Tax | Statement of Operations | \$ - | | | All East Division |
| 51 | Other Taxes | Statement of Operations | \$ - | | Gross Receipts and Other Taxes | All East Division |
| 52 | L.T. Interest | Statement of Operations | \$ - | | | All East Division |
| 53 | Interest Charged to Construction - Credit | Statement of Operations | \$ - | | | All East Division |
| 54 | Interest-Other | Statement of Operations | \$ - | | | All East Division |
| 55 | Other Deductions | Statement of Operations | \$ - | | | All East Division |
| 56 | | | | | | |
| 57 | Directly Assigned 34.5 OM Expenses | | | | | |
| 58 | Transmission O&M | Company Direct Assessment | \$ - | | 560-573 | Direct 34.5 kVA Expenses |
| 59 | Distribution Expense-Operation | Company Direct Assessment | \$ - | | 580-589 | Direct 34.5 kVA Expenses |
| 60 | Distribution Expense-Maintenance | Company Direct Assessment | \$ - | | 590-599 | Direct 34.5 kVA Expenses |
| 61 | Consumer Accounts Expense | Company Direct Assessment | \$ - | | 901-905 | Direct 34.5 kVA Expenses |
| 62 | Customer Service and Informational Expense | Company Direct Assessment | \$ - | | 907-910 | Direct 34.5 kVA Expenses |
| 63 | Sales Expense | Company Direct Assessment | \$ - | | 911-916 | Direct 34.5 kVA Expenses |
| 64 | Administrative and General | Company Direct Assessment | \$ - | | 920-932 | Direct 34.5 kVA Expenses |
| 65 | Total Direct 34.5 Expenses | | \$ - | | | |
| 66 | | | | | | |

Exhibit JED - 3

| <u>WP-1 Cont</u> | <u>Source</u> | | <u>Amount</u> | | <u>Notes</u> | Exhibit JED - 3 |
|------------------|----------------------------------|-----------------------------|---------------|-----|------------------------|-------------------------|
| <u>Line No</u> | (b) | (c) | (d) | (e) | (f) | |
| 67 | C. Payroll | | | | | |
| 68 | Total East Wages | | | | <u>Part of GL acct</u> | |
| 69 | Transmission | Payroll Journal (Labor Amt) | \$ - | | 560-573 | All East Payroll |
| 70 | Distribution Operation | Payroll Journal (Labor Amt) | \$ - | | 580-589 | All East Payroll |
| 71 | Distribution Maintenance | Payroll Journal (Labor Amt) | \$ - | | 590-599 | All East Payroll |
| 72 | Customer Accounting | Payroll Journal (Labor Amt) | \$ - | | 901-905 | All East Payroll |
| 73 | Customer Service and Information | Payroll Journal (Labor Amt) | \$ - | | 907-910 | All East Payroll |
| 74 | Sales | Payroll Journal (Labor Amt) | \$ - | | 911-916 | All East Payroll |
| 75 | Administration and General | Payroll Journal (Labor Amt) | \$ - | | 920-932 | All East Payroll |
| 76 | Total | | \$ - | | Non-capitalized items | |
| 77 | Direct 34.5 Payroll | | | | | |
| 78 | Transmission | Company Direct Assessment | \$ - | | 560-573 | Direct 34.5 kVA Payroll |
| 79 | Distribution Operation | Company Direct Assessment | \$ - | | 580-589 | Direct 34.5 kVA Payroll |
| 80 | Distribution Maintenance | Company Direct Assessment | \$ - | | 590-599 | Direct 34.5 kVA Payroll |
| 81 | Customer Accounting | Company Direct Assessment | \$ - | | 901-905 | Direct 34.5 kVA Payroll |
| 82 | Customer Service and Information | Company Direct Assessment | \$ - | | 907-910 | Direct 34.5 kVA Payroll |
| 83 | Sales | Company Direct Assessment | \$ - | | 911-916 | Direct 34.5 kVA Payroll |
| 84 | Administration and General | Company Direct Assessment | \$ - | | 920-932 | Direct 34.5 kVA Payroll |
| 85 | Total | | \$ - | | Non-capitalized items | |

Exhibit JED - 3

| WP-1 Cont Line No | Source (b) | (c) | Amount (d) | (e) | Notes (f) | |
|----------------------|---|-------------------------------|---------------------------|---------|--------------------------------------|-----------------------------------|
| 73 | D. Miscellaneous | | | | | |
| 74 | 1. Debt Service | | Historical Test Year 2023 | | Source/Notes | |
| 75 | Principal Payments | Supplementary Company Records | \$ - | | Per Company Records. | |
| 76 | | | | | | |
| 77 | 2. Target OTIER/MDSC | As approved by commission | | 1.75 | Proposed value in this year's filing | |
| 78 | | | | | | |
| 79 | 3. Margin Requirement Offsets | | | | | |
| 80 | Investment in Associate Organizations - Patronage Capital | Balance Sheet | \$ - | | Balance Sheet | Hard Keyed |
| 81 | Generation & Transmission Capital Credits | Statement of Operations | \$ - | | | |
| 82 | Other Capital Credits and Patronage Dividends | Statement of Operations | \$ - | | | |
| 83 | Non-Operating Margins - Interest | Statement of Operations | \$ - | | | |
| 84 | Cash Received form G&T/Lenders | Supplementary Company Records | | #DIV/0! | Per Company records | Weighted Lender and G&T Parionage |
| 85 | | | | | | |
| 86 | 4. Other | | | | | |
| 87 | AP Amortization Booked in Other Deductions | Supplementary Company Records | | | Per Company records | |

Exhibit JED - 3

Exhibit JED - 3

WP-2

Exhibit JED - 3

| Line No | Type | Source | Amount | Notes |
|---------|---|----------------------|-------------|--------------------------|
| 1 | 1. Adjustment to Administrative & General per K.S.A 66-101(a), if any: | | | |
| 2 | Applicable Disallowance - A&G | WP6 | \$ - | |
| 3 | Total Adjustment | L10 | <u>\$ -</u> | |
| 4 | | | | |
| 5 | 2. Adjustment to Other Deductions | | | |
| 6 | Historical Amount | Pg.1, L18, Col (d) | \$ - | |
| 7 | Less: Amortization of AP booked in Other Deductions | WP1, L74, Col (e) | <u>\$ -</u> | amort. of AP is constant |
| 8 | Historical Amount with AP removed | L34 - L35 | \$ - | |
| 9 | Sub-total Adjustment | L36 - L34 | \$ - | |
| 10 | Less: Applicable Disallowance - Other Deductions | WP6 | <u>\$ -</u> | |
| 11 | Total Adjustment | L37 - L38 | <u>\$ -</u> | |
| 12 | | | | |

Exhibit JED - 3

Exhibit JED - 3

| WP-3 Line No | Description | Source | Allocator | Amount |
|-----------------|--|-------------------|-----------|---------|
| 1 | OM Expenses Allocation | | | |
| 2 | O&M Expense | | | |
| 3 | Transmission O&M | WP1, L37, Col (d) | | \$ - |
| 4 | Distribution Expense-Operation | WP1, L38, Col (d) | | \$ - |
| 5 | Distribution Expense-Maintenance | WP1, L39, Col (d) | | \$ - |
| 6 | Consumer Accounts Expense | WP1, L40, Col (d) | | \$ - |
| 7 | Customer Service and Informational Expense | WP1, L41, Col (d) | | \$ - |
| 8 | Sales Expense | WP1, L42, Col (d) | | \$ - |
| 9 | Administrative and General | WP1, L43, Col (d) | | \$ - |
| 10 | Total O&M Expense | Sum of L3:9 | | \$ - |
| 11 | | | | |
| 12 | 34.5 Direct Expenses | | | |
| 13 | Transmission O&M | WP1, L58, Col (d) | | \$ - |
| 14 | Distribution Expense-Operation | WP1, L59, Col (d) | | \$ - |
| 15 | Distribution Expense-Maintenance | WP1, L60, Col (d) | | \$ - |
| 16 | Consumer Accounts Expense | WP1, L61, Col (d) | | \$ - |
| 17 | Customer Service and Informational Expense | WP1, L62, Col (d) | | \$ - |
| 18 | Sales Expense | WP1, L63, Col (d) | | \$ - |
| 19 | Administrative and General | WP1, L64, Col (d) | | \$ - |
| 20 | Total 34.5 Payroll | Sum of L13:19 | | \$ - |
| 21 | | | | |
| 22 | Expense Allocation | | | |
| 23 | Transmission O&M | | DOM1 | #DIV/0! |
| 24 | Distribution Expense-Operation | | DOM2 | #DIV/0! |
| 25 | Distribution Expense-Maintenance | | DOM3 | #DIV/0! |
| 26 | Consumer Accounts Expense | | DOM4 | #DIV/0! |
| 27 | Customer Service and Informational Expense | | DOM5 | #DIV/0! |
| 28 | Sales Expense | | DOM6 | #DIV/0! |
| 29 | Administrative and General | | DOM7 | #DIV/0! |
| 30 | | | | |

Exhibit JED - 3

WP-3 Cont

Exhibit JED - 3

| Line No | Description | Source | Allocator | Amount |
|---------|---|---------------------|-----------|---------|
| 31 | General Plant | | | |
| 32 | 34.5 System Direct Wages | WP1, L85, Col (d) | | \$ - |
| 33 | | | | |
| 34 | Total Wages other than A&G | | | \$ - |
| 35 | Total Wages | WP1, L76, Col (d) | | \$ - |
| 36 | Less: Administration & General Wages | WP1, L75, Col (d) | | \$ - |
| 37 | | L35 - L34 | | \$ - |
| 38 | | | | |
| 39 | Transmission Labor Allocator | L32/L37 | LAB | #DIV/0! |
| 40 | | | | |
| 41 | Net Plant Allocation Factor | | | |
| 42 | Plant-in-Service | | | |
| 43 | Transmission | WP1, L11, Col (d) | | \$ - |
| 44 | Distr. Used to provide Local Access Service | WP1, L22, Col (d) | | \$ - |
| 45 | General Plant | | | |
| 46 | Total General Plant | WP1, L29, Col (d) | | \$ - |
| 47 | Allocation Factor | L39 | | #DIV/0! |
| 48 | | L46 * L47 | | #DIV/0! |
| 49 | Total LAD System Plant-in-Service | L43 + L44 + L47 | | #DIV/0! |
| 50 | | | | |
| 51 | Accumulated Reserves for Depreciation | | | |
| 52 | Transmission | WP1, L11, Col (e) | | \$ - |
| 53 | Distribution | WP1, L22, Col (e) | | \$ - |
| 54 | Allocated General Plant | | | |
| 55 | Total General Plant | WP1, L29, Col (e) | | \$ - |
| 56 | Allocation Factor | L39 | | #DIV/0! |
| 57 | | L55 * L56 | | #DIV/0! |
| 58 | Total LAD Accum. System Depr. Res | L52 + L53 + L56 | | #DIV/0! |
| 59 | | | | |
| 60 | Net Plant Used in LAD System | L49 - L58 | | #DIV/0! |
| 61 | | | | |
| 62 | Total Plant In Service | WP1, L30, Col (d) | | \$ - |
| 63 | Less: Total Accum. Reserves for Depr. | WP1, L30, Col (e) | | \$ - |
| 64 | Total Net Plant | L62 - L63 | | \$ - |
| 65 | | | | |
| 66 | Transmission Net Plant Allocator | L60/L64 | NP | #DIV/0! |

Exhibit JED - 3

Exhibit JED - 3

| <u>WP-4</u> | | (c) | (d) | (e) | (f) | (g) |
|-------------|---|-----------------------|-----------------------|-----------------------|---------|------------------|
| (a) | | (b) | Allocation Factor | | | |
| Line No | Metric | Source | Historical Tot Amount | Name | Factor | Allocated to FBR |
| 1 | OTIER | | | pg. 1 Col (g) and (h) | | |
| 2 | LT Interest Expense | Pg.1, L15, Col (d \$ | - | NP | #DIV/0! | #DIV/0! |
| 3 | Cash Received from G&T/lenders | WP1, Col (d), L77 | #DIV/0! | NP | #DIV/0! | #DIV/0! |
| 4 | | | #DIV/0! | | | #DIV/0! |
| 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, L76, Col (d \$ | - | NP | #DIV/0! | #DIV/0! |
| 10 | Cash Patronage Capital* | L18 | \$ - | NP | #DIV/0! | #DIV/0! |
| 11 | Resultant Amount | Sum (L7:L10) | \$ - | | | #DIV/0! |
| 12 | | | | | | |
| 13 | *Calculate Pat. Cap. (Cash): | | | | | |
| 14 | Inv. in Assoc. Org. - Patr. Capital - Current Yr. | WP1, L80, Col (d \$ | - | | | |
| 16 | Generation & Transmission Capital Credits | WP1, L81, Col (d \$ | - | | | |
| 17 | Other Capital Cr. and Patronage Dividends | WP1, L82, Col (d \$ | - | | | |
| 18 | Resultant Amount | L15 + L16 + L17 - | \$ - | | | |

Exhibit JED - 3

WP-5

Exhibit JED - 3

| Line | Description | Jan | Feb | Mar | Apr | May | Jun | July | Aug | Sep | Oct | Nov | Dec | Total |
|------|--|-----|-----|-----|-----|-----|-----|------|-----|-----|-----|-----|-----|-------|
| 1 | Total Local Access System ¹ | | | | | | | | | | | | | 0 |
| 2 | CP Date | | | | | | | | | | | | | |
| 3 | CP Time (hour Ending) | | | | | | | | | | | | | |
| 4 | | | | | | | | | | | | | | |
| 5 | Wholesale Customers @ Del. Pt. | | | | | | | | | | | | | |
| 6 | MWEC 2nd & Kansas 115 B Ch1 | | | | | | | | | | | | | - |
| 7 | MKEC GBS Center # 10 - Sub Ch2 | | | | | | | | | | | | | - |
| 10 | WCEA KS B & T 13.8 # 17 - Sub Ch1 | | | | | | | | | | | | | - |
| 11 | WCEA KS B & T 34.5 # 8 - Sub Ch1 | | | | | | | | | | | | | - |
| 12 | KEPCo Attica | | | | | | | | | | | | | - |
| 13 | KPP City of Attica Ch1 | | | | | | | | | | | | | - |
| 14 | SPECo Chain Ranch # 1 - Sub Ch2 | | | | | | | | | | | | | - |
| 15 | SPECo Hazelton # 2 - Sub Ch1 | | | | | | | | | | | | | - |
| 16 | KEPCo Alameda | | | | | | | | | | | | | - |
| 17 | KEPCo Kingman | | | | | | | | | | | | | - |
| 18 | KEPCo Pretty Prairie | | | | | | | | | | | | | - |
| 19 | KEPCo Norwich | | | | | | | | | | | | | - |
| 20 | KEPCo Runny Meade | | | | | | | | | | | | | - |
| 21 | SPECo Calista # 13 - Sub Ch2 | | | | | | | | | | | | | - |
| 22 | MWE Partridge MWE - Sub Ch1 | | | | | | | | | | | | | - |
| 23 | SPECo Zenda # 12 - Sub Ch2 | | | | | | | | | | | | | - |
| 24 | KEPCo Bluff City | | | | | | | | | | | | | - |
| 25 | KEPCo Caldwell | | | | | | | | | | | | | - |
| 26 | KEPCo Milan | | | | | | | | | | | | | - |
| 27 | Subtotal | | | | | | | | | | | | | - |
| 28 | Losses @ 1.35% of 34.5 kV Output | | | | | | | | | | | | | - |
| 29 | Subtotal with Losses (@ Source) | | | | | | | | | | | | | - |
| 30 | | | | | | | | | | | | | | |
| 31 | Prairie Land Retail 26 Retail with Losses | | | | | | | | | | | | | - |
| 32 | Retail with Losses (@ Source) | | | | | | | | | | | | | - |
| 33 | Losses @ 1.35% of 34.5 kV Input | | | | | | | | | | | | | - |
| 34 | Retail @ Delivery Point | | | | | | | | | | | | | - |
| 35 | | | | | | | | | | | | | | |
| 36 | Total Load (wholesale at source before loss + retail @ delivery pt.) | | | | | | | | | | | | | - |

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

Exhibit JED - 3

WP-6

Exhibit JED - 3

| Line | Account | Description | Total Amount | Total Adjustment |
|------|---------|--|-----------------|------------------|
| 1 | 909.00 | ADVERTISING (INFORMATIONAL & INSTRUCTION | | \$ - |
| 2 | 912.00 | DEMONSTRATION & SELLING EXPENSES | | \$ - |
| 3 | 913.00 | ADVERTISING EXPENSES | | \$ - |
| 4 | 930.20 | MISCELLANEOUS GENERAL EXPENSES | | \$ - |
| 5 | | | | \$ - |
| 6 | | | Staff -Adjusted | \$ - |

Dkt. No. 15-PLCE-176-TAR

Wheatland Electric Cooperative, Inc.
Workbook A: Disallowed Expenses
Year Ending December 31, XXXX

| Account | Description | Amount |
|---------|------------------------------------|-----------------------|
| 909.00 | DESCRIPTION OF DISALLOWED EXPENSES | \$ |
| 912.00 | DESCRIPTION OF DISALLOWED EXPENSES | |
| 913.00 | DESCRIPTION OF DISALLOWED EXPENSES | |
| 930.20 | DESCRIPTION OF DISALLOWED EXPENSES | |
| | Total Disallowed Expenses | \$ <u> -</u> |

Wheatland Electric Cooperative, Inc.
Workbook C: Calculation of Cash Received from G&T and Lenders
Year Ending December 31, XXXX

Total Cash Received from G&T and Lenders

| | | |
|--|----|-------|
| Cash Received from Retirement of Patronage Capital by Suppliers of Electric Power | \$ | |
| Cash Received from Retirement of Patronage Capital by Lenders for Credit Extended to the Electric System | | _____ |
| Total | \$ | = - |

| | | |
|--------------------|----|-------|
| From Trial Balance | | |
| Power Cost - West | \$ | |
| Power Cost- East | | _____ |
| Total | \$ | = - |

| | | |
|-------------------------|----|-------|
| From Trial Balance | | |
| Interest Expense - West | \$ | |
| Interest Expense - East | | _____ |
| Total | \$ | = - |

| | | |
|--|----|-----------|
| Cash Received from Retirement of Patronage Capital by Suppliers of Electric Power | \$ | #DIV/0! |
| Cash Received from Retirement of Patronage Capital by Lenders for Credit Extended to the Electric System | | #DIV/0! |
| Total | \$ | = #DIV/0! |

Wheatland Electric Cooperative, Inc.
Workbook D: Directly Assigned 34.5 kV Expenses
Year Ending December 31, XXXX

| Divison | Account | Total |
|---------|---------|-------|
| 3 | 107.20 | \$ - |
| 3 | 108.80 | - |
| 3 | 163.00 | - |
| 3 | 184.10 | - |
| 3 | 184.20 | - |
| 3 | 242.50 | - |
| 3 | 242.51 | - |
| 3 | 242.52 | - |
| 3 | 416.00 | - |
| 3 | 417.10 | - |
| 3 | 426.10 | - |
| 3 | 562.50 | - |
| 3 | 563.50 | - |

Wheatland Electric Cooperative, Inc.
Workbook D: Directly Assigned 34.5 kV Expenses
Year Ending December 31, XXXX

| Divison | Account | Total |
|---------|---------|-------------|
| 3 | 580.00 | - |
| 3 | 583.00 | - |
| 3 | 584.00 | - |
| 3 | 586.00 | - |
| 3 | 588.00 | - |
| 3 | 592.30 | - |
| 3 | 593.00 | - |
| 3 | 594.00 | - |
| 3 | 595.00 | - |
| 3 | 596.00 | - |
| 3 | 597.00 | - |
| 3 | 903.00 | - |
| 3 | 912.00 | - |
| 3 | 920.00 | - |
| 3 | 932.00 | - |
| | | <hr/> <hr/> |
| | | \$ |

Exhibit JED -3

Wheatland Electric Cooperative, Inc.
Workbook E: Directly Assigned 34.5 kV Payroll and Overhead
Year Ending December 31, XXXX

| Divison | Account | Labor | OH | SEC Dist | Total | |
|---------|---------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| 3 | 107.20 | \$ | \$ | \$ | \$ | - |
| 3 | 108.80 | | | | | - |
| 3 | 163.00 | | | | | - |
| 3 | 184.10 | | | | | - |
| 3 | 184.20 | | | | | - |
| 3 | 242.50 | | | | | - |
| 3 | 242.51 | | | | | - |
| 3 | 242.52 | | | | | - |
| 3 | 416.00 | | | | | - |
| 3 | 417.10 | | | | | - |
| 3 | 426.10 | | | | | - |
| 3 | 562.50 | | | | | - |
| 3 | 563.50 | | | | | - |
| 3 | 580.00 | | | | | - |
| 3 | 583.00 | | | | | - |
| 3 | 584.00 | | | | | - |
| 3 | 586.00 | | | | | - |
| 3 | 588.00 | | | | | - |
| 3 | 592.30 | | | | | - |
| 3 | 593.00 | | | | | - |
| 3 | 594.00 | | | | | - |
| 3 | 595.00 | | | | | - |
| 3 | 596.00 | | | | | - |
| 3 | 597.00 | | | | | - |
| 3 | 903.00 | | | | | - |
| 3 | 912.00 | | | | | - |
| 3 | 920.00 | | | | | - |
| 3 | 932.00 | | | | | - |
| | | \$ | \$ | \$ | \$ | - |
| | | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| | | - | - | - | - | - |
| | | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |

Wheatland Electric Cooperative, Inc.
Workbook F: Total East Division Payroll and Overhead
Year Ending December 31, XXXX

| Divison | Account | Labor | OH | SEC Dist | Total |
|---------|---------|--------|----|----------|-------|
| | 3 | 107.20 | \$ | | \$ - |
| | 3 | 107.20 | | | - |
| | 3 | 108.80 | | | - |
| | 3 | 108.80 | | | - |
| | 3 | 163.00 | | | - |
| | 3 | 163.00 | | | - |
| | 3 | 184.10 | | | - |
| | 3 | 184.10 | | | - |
| | 3 | 184.20 | | | - |
| | 3 | 184.20 | | | - |
| | 3 | 242.50 | | | - |
| | 3 | 242.51 | | | - |
| | 3 | 242.52 | | | - |
| | 3 | 416.00 | | | - |
| | 3 | 417.10 | | | - |
| | 3 | 426.10 | | | - |
| | 3 | 562.50 | | | - |
| | 3 | 563.50 | | | - |

Wheatland Electric Cooperative, Inc.
Workbook F: Total East Division Payroll and Overhead
Year Ending December 31, XXXX

| Divison | Account | Labor | OH | SEC Dist | Total |
|---------|---------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|
| | 3 | 580.00 | | | - |
| | 3 | 580.00 | | | - |
| | 3 | 583.00 | | | - |
| | 3 | 583.00 | | | - |
| | 3 | 584.00 | | | - |
| | 3 | 586.00 | | | - |
| | 3 | 586.00 | | | - |
| | 3 | 588.00 | | | - |
| | 3 | 592.30 | | | - |
| | 3 | 593.00 | | | - |
| | 3 | 594.00 | | | - |
| | 3 | 595.00 | | | - |
| | 3 | 596.00 | | | - |
| | 3 | 597.00 | | | - |
| | 3 | 903.00 | | | - |
| | 3 | 903.00 | | | - |
| | 3 | 912.00 | | | - |
| | 3 | 912.00 | | | - |
| | 3 | 920.00 | | | - |
| | 3 | 920.00 | | | - |
| | 3 | 932.00 | | | - |
| | | \$ <u> </u> | \$ <u> </u> | \$ <u> </u> | \$ <u> </u> |
| | | \$ <u> </u> | \$ <u> </u> | \$ <u> </u> | \$ <u> </u> |

Exhibit JED - 3

Wheatland Electric Cooperative, Inc.
Workbook G: East Division Income Statement
Year Ending December 31, XXXX

| ITEM | YEAR-TO-DATE |
|---|------------------|
| | THIS YEAR (b) |
| 1. Operating Revenue and Patronage Capital | |
| 2. Power Production Expense | |
| 3. Cost of Purchased Power | |
| 4. Transmission Expense | |
| 5. Regional Market Operations Expense | |
| 6. Distribution Expense - Operation | |
| 7. Distribution Expense - Maintenance | |
| 8. Consumer Accounts Expense | |
| 9. Customer Service and Informational Expense | |
| 10. Sales Expense | |
| 11. Administrative and General Expense | |
| 12. Total Operation & Maintenance Expense (2 thru 11) | - |
| 13. Depreciation & Amortization Expense | |
| 14. Tax Expense - Property & Gross Receipts | |
| 15. Tax Expense - Other | |
| 16. Interest on Long-Term Debt | |
| 17. Interest Charged to Construction (Credit) | |
| 18. Interest Expense - Other | |
| 19. Other Deductions | |
| 20. Total Cost of Electric Service (12 thru 19) | - |
| 21. Patronage Capital & Operating Margins (1 minus 20) | 0 |
| 22. Non Operating Margins - Interest | |
| 23. Allowance for Funds Used During Construction | |
| 24. Income (Loss) from Equity Investments | |
| 25. Non Operating Margins - Other | |
| 26. Generation & Transmission Capital Credits | |
| 27. Other Capital Credits & Patronage Dividends | |
| 28. Extraordinary Items | |
| 29. Patronage Capital or Margins (21 thru 28) | 0.00 |

Wheatland Electric Cooperative, Inc.
Workbook H: Directly Assigned 34.5 kV Plant Assets
Year Ending December 31, XXXX

| Div | Account | Asset # | Description | Group | Description | Amount |
|-----|---------|---------|-------------|-------|-------------------|--------|
| 3 | 362 | 362XXXX | | | 34.5kv District X | \$ |

Wheatland Electric Cooperative, Inc.
Workbook H: Directly Assigned 34.5 kV Plant Assets
Year Ending December 31, XXXX

| Div | Account | Asset # | Description | Group | Description | Amount |
|-----|---------|---------|-------------|-------|-------------------|--------|
| 3 | 364 | 364XXXX | | | 34.5kv District X | |

Wheatland Electric Cooperative, Inc.
Workbook H: Directly Assigned 34.5 kV Plant Assets
Year Ending December 31, XXXX

| Div | Account | Asset # | Description | Group | Description | Amount |
|-----|---------|---------|-------------|-------|-------------------|--------|
| 3 | 365 | 365XXXX | | | 34.5kv District X | |

Wheatland Electric Cooperative, Inc.
Workbook H: Directly Assigned 34.5 kV Plant Assets
Year Ending December 31, XXXX

| Div | Account | Asset # | Description | Group | Description | Amount |
|-----|---------|---------|----------------------|-------|-------------------|--------------------|
| 3 | 367 | 367XXXX | | | 34.5kv District X | |
| 3 | 368 | 368XXXX | | | 34.5kv District X | |
| 3 | 369 | 369XXXX | | | 34.5kv District X | |
| | | | Total 34.5 kV Assets | | | \$ <u><u>-</u></u> |

Wheatland Electric Cooperative, Inc.
Workbook I: Trial Balance - Plant Accounts East Division
Year Ending December 31, XXXX

| Account | Acct. | Descr | Debit | Credit |
|---------|-------|--|-------|--------|
| 114.00 | 114 | Electric Plant Amort | \$ | \$ |
| 350.00 | 350 | LAND & LAND RIGHTS-TRANSMISSION | | |
| 355.00 | 355 | POLES & FIXTURES | | |
| 356.00 | 356 | OVERHEAD CONDUCTORS & DEVICES | | |
| 360.00 | 360 | LAND & LAND RIGHTS-DISTRIBUTION | | |
| 362.00 | 362 | STATION EQUIPMENT-DISTRIBUTION | | |
| 362.01 | 362 | Substation - SCADA | | |
| 364.00 | 364 | POLES, TOWERS & FIXTURES | | |
| 364.20 | 364 | POLE TREATMENT | | |
| 365.00 | 365 | OVERHEAD CONDUCTORS & DEVICES | | |
| 367.00 | 367 | UNDERGROUND CONDUCTORS & DEVICES | | |
| 368.00 | 368 | LINE TRANSFORMERS | | |
| 369.00 | 369 | SERVICES | | |
| 370.00 | 370 | METERS | | |
| 370.05 | 370 | METERS-AMI | | |
| 371.00 | 371 | MERCURY VAPOR LIGHTS-INSTALL ON CONS PRE | | |
| 371.11 | 371 | LED Street Lights | | |
| 389.00 | 389 | LAND AND LAND RIGHTS | | |

Wheatland Electric Cooperative, Inc.
Workbook I: Trial Balance - Plant Accounts East Division
Year Ending December 31, XXXX

| Account | Acct. | Descr | Debit | Credit |
|---------|-------|--|--------------------------------|--------------------------------|
| 390.00 | 390 | STRUCTURES & IMPROVEMENTS | | |
| 391.00 | 391 | OFFICE FURNITURE & FIXTURES | | |
| 391.10 | 391 | SYSTEMS SOFTWARE | | |
| 391.15 | 391 | GENERATORS | | |
| 391.20 | 391 | COMPUTER HARDWARE (AS400/SERVERS/ETC) | | |
| 391.25 | 391 | DAFFRON SOFTWARE | | |
| 391.30 | 391 | PC HARDWARE & EQUIPMENT | | |
| 391.40 | 391 | ITRON HARDWARE | | |
| 391.50 | 391 | NETWORK & VOICE LINK HARDWARE (PHONES) | | |
| 391.80 | 391 | MAPPING HARDWARE (PCS, ETC.) | | |
| 391.90 | 391 | STAKING EQUIPMENT (PCS, ETC.) | | |
| 392.00 | 392 | TRANSPORTATION EQUIPMENT | | |
| 393.00 | 393 | STORES EQUIPMENT | | |
| 394.00 | 394 | TOOLS, SHOP & GARAGE EQUIPMENT | | |
| 395.00 | 395 | LABORATORY EQUIPMENT | | |
| 396.00 | 396 | POWER OPERATED EQUIPMENT | | |
| 397.00 | 397 | COMMUNICATIONS EQUIPMENT | | |
| 398.00 | 398 | EQUIPMENT-MISCELLANEOUS | | |
| 399.26 | 399 | WIRELESS--TOWERS | | |
| 399.28 | 399 | WIRELESS ASSETS--OTHER | | |
| | | Total | \$ <u> </u> | \$ <u> </u> |
| | | | \$ <u> </u> | \$ <u> </u> |

Wheatland Electric Cooperative, Inc.
Workbook J: Trial Balance - Accumulated Depreciation Accounts East Division
Year Ending December 31, XXXX

| Account | Acct. | Description | Debit | Credit |
|---------|-------|--|-----------------------|-----------------------|
| 108.50 | 108 | ACCUMULATED DEPRECIATION-TRANSMISSION PL | \$ | \$ |
| 108.60 | 108 | ACCUMULATED DEPRECIATION-DISTRIBUTION PL | | |
| 108.70 | 108 | ACCUMULATED DEPRECIATION-GENERAL PLANT-S | | |
| 108.71 | 108 | ACCUMULATED DEPRECIATION-GENERAL PLANT-S | | |
| 108.72 | 108 | ACCUMULATED DEPRECIATION-FURNITURE & FIX | | |
| 108.73 | 108 | ACCUMULATED DEPRECIATION-TRANSPORTATION | | |
| 108.74 | 108 | ACCUMULATED DEPRECIATION-STORES EQUIPMEN | | |
| 108.75 | 108 | ACCUMULATED DEPRECIATION-SHOP EQUIPMENT | | |
| 108.76 | 108 | ACCUMULATED DEPRECIATION-LABORATORY EQUI | | |
| 108.77 | 108 | ACCUMULATED DEPRECIATION-COMMUNICATIONS | | |
| 108.78 | 108 | ACCUMULATED DEPRECIATION-MISCELLANEOUS E | | |
| 108.79 | 108 | ACCUMULATED DEPRECIATION-LARGE TOOLS | | |
| 108.80 | 108 | RETIREMENT WORK IN PROGRESS | | |
| 108.99 | 108 | RETIREMENT WORK IN PROGRESS--OTHER | | |
| 115.00 | 115 | ACCUMULATED DEPRECIATION-ELECT. PLANT AC | | |
| | | | \$ <u> -</u> | \$ <u> -</u> |

Wheatland Electric Cooperative, Inc.
Workbook K: Directly Assigned 34.5 kV Plant Assets Accumulated Depreciation
Year Ending December 31, XXXX

| Div | Account | Asset | Description | Group | Description | Amount |
|-----|---------|---------|-------------------------|-------|-------------------|--------------------|
| 3 | 362 | 362XXXX | PLANT ASSET DESCRIPTION | | 34.5kv District X | |
| 3 | 364 | 364XXXX | PLANT ASSET DESCRIPTION | | 34.5kv District X | |
| 3 | 365 | 365XXXX | PLANT ASSET DESCRIPTION | | 34.5kv District X | |
| 3 | 367 | 367XXXX | PLANT ASSET DESCRIPTION | | 34.5kv District X | |
| 3 | 368 | 368XXXX | PLANT ASSET DESCRIPTION | | 34.5kv District X | |
| 3 | 369 | 369XXXX | PLANT ASSET DESCRIPTION | | 34.5kv District X | |
| | | | Total 34.5 kV Assets | | | \$ <u><u>-</u></u> |

Wheatland Electric Cooperative, Inc.
Workbook L: Trial Balance - Depreciation Expense Accounts East Division
Year Ending December 31, XXXX

| Account | Description | Debit | Credit |
|---------|--|--------------------------------|--------------------------------|
| 403.10 | DEPRECIATION EXPENSE (COLORADO) | \$ | \$ |
| 403.25 | DEPRECIATION EXPENSE (WIRELESS) | | |
| 403.30 | DEPRECIATION EXPENSE--WATER WORKS | | |
| 403.50 | DEPRECIATION EXPENSE (TRANSMISSION PLANT | | |
| 403.60 | DEPRECIATION EXPENSE (DISTRIBUTION PLANT | | |
| 403.70 | DEPRECIATION EXPENSE (GENERAL PLANT) | | |
| 406.00 | Amort of Elect Plant Adj | | |
| | Total | \$ <u> </u> | \$ <u> </u> |
| | | \$ <u> </u> | \$ <u> </u> |

Wheatland Electric Cooperative, Inc.
Workbook M: Principal Payments - East Division
Year Ending December 31, XXXX

| Note | Principal Payment |
|---|------------------------------|
| Total Eastern Division Principal Payments | \$ <u><u>-</u></u> |

**The Wheatland Electric Cooperative,
Inc.**

34.5kV FBR Protocols

A. PURPOSE

The 34.5kV FBR is an annual formula-based ratemaking mechanism applicable to the Wheatland Electric Cooperative, Inc. ("Wheatland" or "Cooperative") provision of 34.5kV service for its Eastern Division. Its purpose is to allow for timely adjustments to the corresponding Local Access Charge ("LAC"), a wholesale rate within the Local Access Delivery Service ("LADS") tariff, without the expense (public and private) and regulatory lag related to preparing and presenting a 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 the Commission-approved 34.5kV FBR, Wheatland 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").

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, unless otherwise ordered by the Commission, Wheatland, Commission Staff, and Interveners will process the filing as set forth herein. All discovery and confidentiality issues will be governed by Commission Discovery and Protective Orders, which will be issued after the filing of the Annual Update. Upon receipt of the Annual Update filing, the Commission may also 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 but not prior to March 1. |
| Day 75 | A one-day Technical Conference will be set at a date mutually agreeable to the parties but no later than 75 days, if necessary. |
| Day 110-115 | A status telephone conference call will be set during this time. |
| Day 120 | Staff and Interveners complete the review of the Annual Update, and either file a Report and Recommendation or testimony stating that the results of the filing will result in just and reasonable rates; or, if necessary, Staff and/or Interveners shall file testimony supporting the reason(s) why the filing would not result in just and reasonable rates. |
| Day 135 | Wheatland files rebuttal testimony, if necessary. |
| Day 142 | Discovery Cutoff. |
| Day 150 | 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. |

EXHIBIT JED – 4

- Day 155-159 A one-day evidentiary hearing will be set during this time in case it is needed based upon the Commission 150-day Order.
- Day 180 Final Order issued if the matter goes to evidentiary hearing.

The Commission Staff, and any other Intervener, will have 120 days from the Filing Date¹ to review the Annual Update to determine if it results in just and reasonable rates that are in the public interest.

If within 120 days from the Filing Date (or March 1 for earlier filings), the Commission Staff and/or Interveners make a determination that indicates the results of the Annual Update filing are just and reasonable, then the Commission Staff will file a Report and Recommendation or written testimony with the Commission detailing these findings and interveners may choose to file testimony stating the same or elect to not file testimony. 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 Staff to file a Report and Recommendation is intended 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 120 days from the Filing Date (or March 1 for earlier filings), 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 Wheatland. The parties shall utilize the Technical Conference and Status Telephone 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 120 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. Questions, concerns or complaints regarding Wheatland 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 docket. However, no party is precluded from raising such issues through the normal means available before the Commission.

If within 120 days of the Filing Date (or March 1 for earlier filings), Staff and/or Interveners file testimony regarding Wheatland's Annual Update filing indicating the filing would result in an unjust or unreasonable rate that is not in the public interest, then Wheatland shall have the opportunity to file responsive testimony to said objection(s) within 135 days from the Filing Date. In this event, within 150 days from the Filing Date, unless otherwise ordered, the Commission will issue an order either approving the

¹ The procedural schedule for filings made prior to March 1 will start no earlier than March 1 and not the Date of Filing.

EXHIBIT JED – 4

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 180 days from the Filing Date. This 180-day order date may be extended by Commission Order if circumstances arise supporting a deviation from the agreed 180-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 Wheatland, its rates or services.

C. CUSTOMER NOTIFICATION

At the time of filing the Annual Update, the entities granted intervention in any Wheatland FBR docket who are also customers, or customer's representative, of Wheatland and all customers taking wholesale Local Access Delivery Service from Wheatland will receive notice of the filing when 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 citation to relevant KCC dockets and the date of the Commission's Order approving the initial application for Wheatland's 34.5kV FBR.
5. A Wheatland contact person and phone number for questions.

D. CALCULATION

Each filing shall be based on actual historical financial results as presented in the sources listed below and utilizing the RUS Uniform System of Accounts: ²

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

² Reference United States Department of Agriculture Rural Utilities Service Bulletin 1767B-1 which contains the Uniform System of Accounts for Electric Borrowers.

EXHIBIT JED – 4

The calculation shall follow the form and format included in the 34.5kV FBR templates, both blank, and populated, as approved by the Commission in 25-WHLE-____-_____. The financial results utilized to populate these templates for purposes of the Annual Update filing should be limited to plant investment and expenses identified below that are directly related to the provision of 34.5kV service for the Eastern Division of Wheatland. Specific details concerning the calculation are as follows:

1. Adjustments to actual results for the historical 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 Administrative and General Expense ("A&G") per Commission policy in accordance with K.S.A. 66-101f(a) as defined in 1.b below and which may be applicable.
 - b. *Administrative and General Expense ("A&G")* 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). As set forth below, Wheatland will include with the 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.
 - c. *Depreciation* will be adjusted to remove any Acquisition Premium ("AP") amortization portion, if applicable.
 - d. *Other Deductions* - If applicable, *Other Deductions* expense will be adjusted consistent with the adjustment to A&G per

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Commission policy in accordance with K.S.A. 66-101f(a) as defined in 1.b above. Additionally, if applicable, the Acquisition Premium ("AP") amortization portion will be removed from Other Deductions.

2. The 34.5kV FBR is intended to apply only to the sub-transmission portion of Wheatland's system utilized to provide 34.5kV service on the Eastern Division 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 Test Year expenses will need to be adjusted to remove the portion not associated with these facilities before the LAC rate is calculated. The allocation method to be used is listed next to each category. Because Wheatland has the capability to directly assign Distribution O&M expenses related to the distribution assets serving the 34.5 transmission assets, these costs will be directly assigned as incurred. This is reflected by allocation factors DOM 1 through DOM 7. 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").³ 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 the year end Net 34.5kV Plant to the year end 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 including supporting documentation with each Annual Update filing.
 - a. A&G Expenses: allocated on LAB ratio.
 - b. Depreciation and Amortization Expense: direct-assigned, with the LAB ratio being used to allocate General Plant Depreciation expense.
 - c. Taxes other than Income 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.

³ If any distribution plant that provides Local Access Delivery Service is present as detailed in D. I. 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.

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- 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 - Wheatland will utilize the 1.75 OTIER or 1.75 MDSC. The ratio resulting in greater net margins required 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 the 34.5kV templates approved by the Commission in 25-WHLE-____-____. To arrive at the \$ per kW rate, the Total Revenue Requirement is divided by the Total Billing Demand for the Test Year. The resulting \$ per kW rate will become the stated demand charge in Wheatland's Eastern Division tariff schedule for Local Access Delivery Service.

E. FILING EXHIBITS

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

1. An Annual Update filing containing the rate adjustments requested in compliance with the requirements of the Commission-approved 34.5kV FBR. The filing should include testimony describing the rate adjustments being requested, and specifically how the Annual Update filing complies with the requirements of the 34.5kV FBR plan approved by the Commission in 25-WHLE-____-____.
2. A complete RUS, CFC, or Co-Bank Form 7 (or successor document) detailing the consolidated financial position of Wheatland (the combined financial position of the acquired Eastern and Western divisions).
3. Unaudited financial statements detailing the consolidated financial position of Wheatland (the combined financial position of the acquired/Mid-Kansas division and the native division). An audited financial statement shall be filed no later than June 1.
4. Wheatland's Comparative Operating Income Statement and Balance Sheet, for the Test Year and two previous calendar years.
5. Completed formulas as contained in the 34.5kV FBR template approved for Wheatland by the Commission in 25-WHLE-____-____. 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.
6. Trial Balance for the Test Year and two previous years.
7. Payroll Journal for the Test Year and two previous years.

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8. Any other applicable supplemental schedules necessary to audit the filing for the Test Year.
9. 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.
10. A summary explanation of any material increases (more than 10% in a cost of service item from the previous year). This explanation should include at a minimum a discussion of the drivers behind this change in costs and any steps Wheatland took to lessen the impact of this cost increase on its customers. This explanation may be contained within the pre-filed testimony included in the Annual Update filing.
11. A detailed and substantive narrative describing the process used to allocate any costs to the Eastern Division from the consolidated financials of Wheatland. This narrative should also discuss in detail, any changes during the Test Year in the allocation process from the previous calendar year and the rationale for the allocation change.
12. Proposed tariff sheets including the proposed rate adjustment.

All required information will be e-mailed or made accessible on Wheatland'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, Wheatland will work with Staff and Interveners to schedule a one-day Technical Conference, if necessary, to be held no later than 75 days from the Filing Date. The Technical Conference will be held at the Wheatland's home office. Wheatland will make its staff available to review requested documents and respond to questions. The parties shall submit to Wheatland at least 10 business days before the conference a list of questions and a list of documents that the parties want Wheatland to be prepared to answer and produce, respectively, at the technical conference. If requested, Wheatland will make available to Staff, Interveners and the parties' consultants who are unable to travel to the home office, access to the conference via "TEAMS Meeting" or a similar internet-based conference program.

Within days 110-115 from the Filing Date, Wheatland 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 Staffs filing of a Report and Recommendation indicating the results of the Annual Update filing are just and reasonable.

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G. EQUITY TEST

No later than March 1 of the Rate Year following any Rate Year when Wheatland's distribution equity ratio reaches 40.00 percent,⁴ Wheatland shall make an appropriate filing with the KCC to retain or modify the Operating Times Interest Earned Ratio and Modified Debt Service Coverage included in the Formula.

H. TERM

The 34.5kV FBR plan as described herein shall be implemented for a period of five calendar years, inclusive of the year adopted, with the initial filing occurring in year 2025, and the final filing occurring in 2029. During the final year of the 34.5kV FBR plan, Wheatland shall advise the Commission whether it wishes to continue the 34.5kV FBR plan and provide the Commission support and rationale for its position in a separate application and docket. Staff of the Commission and any Intervener granted intervention by the Commission for the Annual Updates shall have the right to comment on the merits of such a request.

I. MISCELLANEOUS PROVISIONS

1. Nothing in these Protocols limits or deprives Wheatland, Staff of the Commission or any Intervener of any rights or obligations 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 Wheatland, Staff of the Commission or any Intervener's rights or obligations under any applicable provision of applicable law, including all applicable laws pertaining to the burden of proof or the just and reasonableness of the rates.
2. Entities granted intervention in 25-WHLE-____ - ____ who either are or represent customers of Wheatland at the time of the Annual Update filing will be considered automatically approved for intervention upon the filing an Entry of Appearance in any individual Annual Update filing, provided they are not prohibited from participation by statute or otherwise.

J. DEFINITIONS

CFC - National Rural Utilities Cooperative Finance Corporation.

Debt Service Payments means actual interest and principal payments made during the Test Year, including both long-term and short-term debt.

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

⁴ For purposes of this provision, distribution equity ratio will be calculated exclusive of equity in or from associated organizations.

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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 any party which has been granted intervention by the Commission in Wheatland's Annual Update filing or as provided in Section I(2).

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

LAC rate means the Local Access Charge \$ per kW demand rate for the wholesale Local Access Delivery Service over Wheatland's Eastern Division of its local access delivery system as defined in the Wheatland's corresponding Local Access Delivery Service tariff on file with the Commission.

Local Access Delivery Service ("LADS") means wholesale delivery service under the tariff approved by the Commission and over Wheatland'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 utilized in the 34.5kV FBR template approved by the Commission.

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

Monthly System Peak means the monthly maximum hourly demand on Wheatland'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 Wheatland's year end monthly trial balance for the Test Year.

Net Transmission Plant means the total plant in service used by Wheatland for the provision of 34.5kV Local Access Service (including 34.5kV Transmission Plant in Wheatland'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 LADS, 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 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 Wheatland's annual earnings before interest to its annual interest expense, calculated in accordance with the formula guidelines utilized in CFC Key Ratio Trend Analysis.

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

Transmission Labor means the Test Year wages associated with the provision of 34.5kV Local Access Service associated with the portion of 34.5kV Transmission Expense in accounts 560-573 per RUS Uniform System of Accounts and, if applicable, the portion of any allocated Distribution wages associated with 34.5kV service included in 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 historical full calendar year prior to the Filing Date.