

April 16, 2018

***VIA ELECTRONIC FILING***

Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Secretary

RE: **Docket No. 17-035-69 – Investigation of Revenue Requirement Impacts of the New Federal Tax Legislation Titled: “An act to provide for reconciliation pursuant to titles II and V of the concurrent resolution of the budget for fiscal year 2018”**

Pursuant to the Scheduling Order, Notice of Hearing, and Notice of Scheduling Conference issued by the Public Service Commission of Utah (the “Commission”) March 7, 2018, Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “the Company”), hereby submits its reply comments in response to the responsive comments filed by the intervening parties in this docket on April 9, 2018.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
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By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,



Joelle Steward  
Vice President, Regulation

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Attorneys for Rocky Mountain Power

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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Investigation of Revenue Requirement Impacts of the New Federal Tax Legislation Titled: “An act to provide for reconciliation pursuant to titles II and V of the concurrent resolution of the budget for fiscal year 2018”	Docket No. 17-035-69 <b>REPLY COMMENTS OF ROCKY MOUNTAIN POWER</b>
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Pursuant to the Scheduling Order, Notice of Hearing, and Notice of Scheduling Conference issued by the Public Service Commission of Utah (the “Commission”) March 7, 2018 (the “March 7 scheduling order”), Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “the Company”), hereby respectfully submits its reply comments in response to the responsive comments filed by the intervening parties in this docket on April 9, 2018. Based on parties’ comments and further review and analysis of the potential impacts to its credit metrics, the Company is modifying its proposal to increase its interim proposed rate reduction from \$20 million to \$61 million, or 3.1 percent, effective May 1, 2018. This is approximately 80 percent of the current estimate for revenue requirements

impacts of Tax Cuts and Jobs Act of 2017 (“Tax Reform Act”), and is consistent with the recommendation by Utah Association of Energy Users (“UAE”). The Company continues to propose to defer the incremental impacts of the Tax Reform Act in a regulatory liability account until it calculates the total balance of revenue requirements and understands how its immediate refund will affect a corresponding reduction in cash flows, and potentially, its credit rating. This approach strikes a reasonable balance between providing current customers the benefits of tax reform and protecting the financial health of the Company for both near- and long-term customers. In addition, the regulatory liability can be used to provide near-term rate stability by offsetting known costs until the next general rate case. In support of its Response, the Company states as follows:

### **PROCEDURAL BACKGROUND**

1. The Company incorporates the procedural background of this docket as referenced in its February 7, 2018 comments (“Comments”), and in its March 16, 2018 application for proposed Tariff Schedule 197 (“Application”). In its Application, the Company provided an overview of the Tax Reform Act, the estimated revenue requirements impacts of the Act, and its proposed accounting treatment of the impacts. The Company proposed a tariff to provide a rate reduction of approximately \$20 million to customers on May 1, 2018, and proposed to defer the remaining balance, once finally calculated by the Company, to be used for rate stabilization purposes.

2. On March 16, 2018, the Company filed its Application seeking Commission authorization for the Company to begin delivering the benefits of the Tax Reform Act to customers May 1, 2018.

3. On April 9, 2018, the Division, the Office, UIEC, UAE, Nucor-Steel-Utah, a Division of Nucor Corporation (“Nucor”), and US Magnesium, LLC (“US Mag”) all submitted comments in response to the Application. In addition, on the same date, the UAE and US Mag petitioned to intervene in this docket.

4. On April 10, 2018, Nucor and the UAE petitioned to intervene in this docket, UIEC submitted comments stating its position against the need for a hearing on the Company’s proposed tariff, and the Company submitted comments requesting a stay of the April 10, 2018 deadline set by the Commission for comments on whether a hearing is necessary because the Company was negotiating a stipulation relating to the Tax Reform Act, repowering, and its Gateway Energy Vision 2020 cases before the Wyoming Public Service Commission.

5. On April 11, 2018, the Division filed comments in opposition to the stay requested by the Company. On the same date, the Commission issued a notice stating that it would consider additional input on the need for a hearing in this docket to the extent submitted by the parties before noon on April 13, 2018, while maintaining the April 16, 2018 deadline for reply comments set in the March 7 scheduling order.

6. On April 13, 2018, the Company filed a letter requesting that the Commission hold the hearing scheduled for April 18, 2018 in this docket. On the same date, Nucor filed

comments stating its position that no hearing would be necessary if the Commission decided that an interim reduction related to Tax Reform is uniformly applied to all customers, including special contract customers and that, to the extent the Commission is considering excluding such customers from the interim reduction, a hearing should be held. In addition, on April 13, 2018 the Office moved for the Commission to allow its expert witness to appear telephonically at the April 18, 2018 hearing, to the extent the Commission determined a hearing was necessary.

7. On April 13, 2018, the Commission issued an order confirming that a hearing would be held April 18, 2018, and granting the Office's motion to allow its witness to appear telephonically.

### **PROPOSED INTERIM REFUND**

The Division, the Office and UIEC recommend refunding \$76.2 million in savings related to the Tax Reform Act through the end of 2018. UAE recommends a \$61 million rate reduction, stating that it is “does not object to a two-stage approach in which an immediate rate reduction is made on or before May 1, 2018, followed by a more comprehensive calculation based on the December 2017 ROO ... [t]herefore, [ ] the initial reduction should be set at no less than 80 percent of the partial estimate, or approximately \$61 million, and allocated as proposed by RMP.”<sup>1</sup> Based on the responses by stakeholders and the Company's continuing evaluation on potential impacts to its credit ratings due to the reduction in cash flow from the

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<sup>1</sup> See UAE's Comments in Response to RMP Deferred Accounting Filing, at 4.

refund, as discussed in more detail below, the Company is adopting UAE's proposal to implement a \$61 million rate credit as the initial refund. The approach is reasonable and balances customer benefits of a significant immediate rate reduction while recognizing that tax reform is a complex issue that should be carefully evaluated before a final decision regarding an immediate refund of the total balance is made.

The Company has agreed, since the inception of the docket, that the benefits of tax reform should be passed on to customers; however, the Company continues to recommend an approach that balances both near-term reductions with rate stability and the financial health of the Company. Therefore, the Company does not recommend that the full estimate of \$76.2 million be returned to customers beginning May 1 as proposed by the Division, Office, and UIEC. It is not prudent to act too quickly to reduce customer rates before all of the impacts are known. Once the Company has calculated and filed its June 15, 2018 update filing ("June 15 Filing"), the full impacts can be carefully reviewed, and a plan to reduce customer rates to a sustainable level can be determined while also allowing time for the credit markets to respond to ensure that the Company does not receive a credit downgrade as a result of the reduction in cash flow.

The DPU notes that if the decrease in cash flow impacts the Company's creditworthiness, the Company could simply propose treatment in the June 15 Filing. However, this "remedy" is short-sighted as the treatment that would be needed would be to increase the equity portion of the capital structure to restore the Company's credit metrics, an issue that is

normally addressed in the context of a general rate case. As shown in Confidential Exhibit 1, the Company is unable to achieve the cash from operations pre-working capital to debt ratio (CFO pre-W/C/Debt) required by Moody's to maintain its A3 issuer rating in *all* scenarios where 100 percent of the benefits are refunded to customers immediately.

Significant cost pressures are possible in the near-term, as outlined in the March 16, 2018 filing. The Division dismissed the Company's concern, claiming that these are not a reason to return less than the full amount to customers because the cost pressures are not known. While final impacts of some of the known cost pressures are not yet final, there are items that are known at this time that could be mitigated with the tax deferral before the next general rate case, including the regulatory assets for the Deer Creek mine closure and the Energy Imbalance Market implementation. Other cost drivers, such as the expiration of the Production Tax Credits ("PTCs") and the upcoming depreciation study, are known cost pressures that will be reflected in the Company's next general rate case. To illustrate, Table 1 below shows the timing of the expiring PTCs.

<b>Table 1</b>				
<b>Total Company Renewable Energy Tax Credit</b>				
<b>CY 2017</b>				
<b>Description</b>	<b>Expiration Date</b>	<b>Available kWh*</b>	<b>Factor (inflated tax per unit)</b>	<b>Federal Income Tax Credit</b>
<b><u>Wind/Geothermal</u></b>				
Glenrock KWh	12/30/2018	268,269,000	0.024	\$ 6,438,456
Glenrock III KWh	1/16/2019	99,455,000	0.024	2,386,920
Goodnoe KWh	12/17/2017	191,917,000	0.024	4,606,008
High Plains Wind	10/14/2019	279,904,000	0.024	6,717,696
Leaning Juniper 1 KWh	9/13/2016	-	0.024	-
Leaning Juniper Indemnity	9/13/2016	-	0.024	-
Marengo KWh	8/2/2017	315,543,000	0.024	7,573,032
Marengo II KWh	6/25/2018	153,361,000	0.024	3,680,664
McFadden Ridge	10/31/2019	84,559,000	0.024	2,029,416
Rolling Hills KWh	1/16/2019	237,002,000	0.024	5,688,048
Seven Mile KWh	12/30/2018	334,363,000	0.024	8,024,712
Seven Mile II KWh	12/30/2018	66,294,000	0.024	1,591,056
Dunlap I Wind KWh	9/29/2020	351,261,000	0.024	8,430,264
Total KWh Production		2,381,928,000		\$ 57,166,272
Grossed-up for taxes				1.3260
Revenue Requirement				\$ 75,803,865

\* Source: PacifiCorp 2017 FERC Form 1

Table 1 demonstrates that during calendar year 2018, PTCs associated with wind projects Glenrock, Marengo II, Seven Mile I, and Seven Mile II expire this year for a \$26.2 million impact to total-Company revenue requirement. During 2019, PTCs from another four projects expire totaling \$22.3 million on a total-Company basis, leaving only one project qualifying for PTCs by 2020. The rate impacts with this are both significant and known and will be a cost driver in the next general rate case.

Another example of a known source of significant cost pressures is the depreciation expense increase in the Company's next depreciation study, which will be filed September 2018. Although the impacts to depreciation expense have not been finalized, what is known is



that the last depreciation study provided for an excess reserve giveback of over \$20 million for Utah customers. Even if no change to depreciation expense occurs, which is highly unlikely given the capital investments the Company has made since the last depreciation study, it is known that the excess reserve giveback will cease, for an increase of at least \$20 million per year for Utah customers.

The Division and other parties state that more information is necessary. The Company agrees more information is necessary and has not proposed to prematurely offset these costs with tax reform. Instead, the Company recognizes that a portion of the tax reform benefits could help mitigate these known near-term increases and help stabilize rates. The matter should be carefully considered with all the relevant facts before the full amount is placed into rates to make sure that a plan for rate stability is well developed. Adopting the Division's and other parties' approach is not reasonable given the potential harm to the Company's credit ratings, which would have longer-term consequences for customers. In contrast, the Company's recommendation harms neither customers nor the Company and is the most reasonable and appropriate approach.

### **DPU PROPOSAL FOR ONE-TIME CREDIT**

The Division proposes the tax savings deferral balance for the January 1, 2018 through April 30, 2018 period, approximately \$25 million, be refunded as a one-time credit on customer bills. However, the Division provides no details about how this proposal would be implemented and how the one-time credit would be calculated and applied. For example, is it

per customer, current customers only, based on customer usage, and if so, usage over what period? Also, a one-time credit exacerbates the Company's credit metric concerns by reducing cash flow and could cause a significant reduction in the Moody's FFO/Debt metric. The Office also discussed several options for the liability balance accrued as of April 30, 2018, concluding that the next general rate case would be a reasonable forum to determine how to return those funds to customers, stating, "[a]t that time the parties could opine on whether the balance should be amortized and the appropriate amortization period, or if the balance should be used to offset an existing regulatory asset."<sup>2</sup> The Company agrees with the Office that this accrued balance should be evaluated in the context of other cost drivers to provide rate stability and the Company's health, and not hastily credited to customers as proposed by the Division.

### **DEER CREEK AMORTIZATION**

The Company's 2018 Energy Balancing Account ("EBA") filing proposed removing the Deer Creek amortization expense from the EBA and offsetting it with the tax deferral. The Company's alternate proposal would result in an EBA rate decrease to customers of approximately \$6.5 million, compared to a \$2.8 million increase if the Deer Creek costs are left in the EBA. The Division does not support this proposal, stating that it is not appropriate to "intermingle" the funds from the Tax Reform Act with other items. It further recommends that if the Company's proposal is adopted, the bills continue to "still be offset by savings from tax reform on the customers' bills and still show in their respective line items."<sup>3</sup> The Division's

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<sup>2</sup> See Office of Consumer Services' Comments, Attachment A, at 6.

<sup>3</sup> See Division of Public Utilities' Comments, at 5.

claim is that this will send clear price signals to customers. However, the Deer Creek mine costs are an amortization for costs already approved and incurred and therefore have no relevance for current price signals to customers for fuel and purchase power. The EBA provides recovery over a near-term period without pushing off the costs to future customers. Therefore, the Division's unwillingness to use the tax deferral to offset these costs in a manner that provides the Company the recovery it has been authorized, with no rate impact to customers is confusing.

#### **PROPOSED REQUIREMENTS FOR JUNE 15, 2018 FILING**

UAE recommends that the Commission require the Company to prepare amortization schedules for the Excess ADIT in its June 15 Filing. The Company believes this recommendation is premature. After the EDIT is calculated in the June 15 filing and the Commission issues a scheduling order for the filing, that would be the appropriate time to start discussion on the amortization periods and ratemaking treatment for the non-protected property.

#### **ALLOCATION OF REFUND TO CUSTOMER CLASSES**

In April 9, 2018 Comments, US Mag and Nucor argued that they should be allocated a share of the refund associated with the Tax Reform Act. The Company's March 23, 2018 filing presented Exhibit A, the proposed Tariff Schedule 197 to implement the \$20 million rate reduction effective May 1, 2018 and Exhibit B, the proposed allocation to customer classes

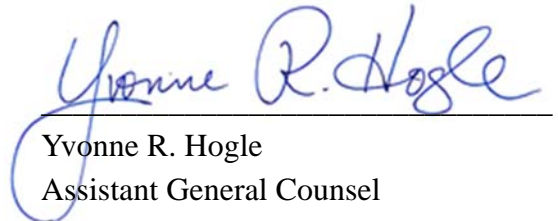
and the calculation of the proposed rates. Exhibit B did not include US Mag and Nucor in the rate spread for the refund.

The Company is not opposed to allocating an overall percentage decrease to Nucor and US Magnesium. Attached Exhibit 2 provides a revised version of Exhibit B, which was filed with the Company's March 16, 2018 application, and shows the allocation of the \$61 million rate reduction to Special Contracts 1 and 2. The Company proposes to make a compliance filing once the Commission rules on the interim rate decrease to reflect the outcome of the order in the Tariff Schedule 197.

Based on the foregoing, the Company respectfully requests the Commission approve the Company's proposed revised ratemaking treatment for the associated tax reform impacts, as set forth above. Alternatively, in recognition of the complexities of determining and implementing the impacts of tax reform, the Company proposes an extension of its proposed May 1, 2018 effective date to allow the Commission and parties additional time to review, with the possibility of a technical conference to informally discuss before a hearing.

RESPECTFULLY SUBMITTED,

ROCKY MOUNTAIN POWER



Yvonne R. Hogle  
Assistant General Counsel

Confidential

Exhibit 1

**THIS EXHIBIT IS CONFIDENTIAL IN ITS  
ENTIRETY AND IS PROVIDED UNDER  
SEPARATE COVER**

## Exhibit 2

**Rate Spread**  
**Rocky Mountain Power**  
**Estimated Effect of Proposed Changes**  
**on Revenues from Electric Sales to Ultimate Consumers in Utah**  
**Base Period 12 Months Ending June 2013**  
**Forecast Test Period 12 Months Ending June 2015**

Line No.	Description (1)	Sch No. (2)	Present		Proposed TAA	
			Revenues (\$000) (3)	Rate Base <sup>1</sup> F101 (4)	(\$000) (5)	% (6)
<b>Residential</b>						
1	Residential	1,3	\$684,505		(\$24,670.71)	-3.6%
2	Residential-Optional TOD	2	\$351		(\$13)	-3.6%
3	AGA/Revenue Credit	--	\$33			
4	<b>Total Residential</b>		<u>\$684,889</u>	<u>40.6%</u>	<u>(\$24,683)</u>	<u>-3.6%</u>
<b>Commercial &amp; Industrial &amp; OSPA</b>						
5	General Service-Distribution	6	\$494,681		(\$15,125)	-3.1%
6	General Service-Distribution-Energy TOD	6A	\$34,227		(\$1,047)	-3.1%
7	General Service-Distribution-Demand TOD	6B	\$346		(\$11)	-3.1%
8	<i>Subtotal Schedule 6</i>		<u>\$529,255</u>	<u>26.6%</u>	<u>(\$16,183)</u>	<u>-3.1%</u>
9	General Service-Distribution > 1,000 kW	8	\$167,313	7.6%	(\$4,616)	-2.8%
10	General Service-High Voltage	9	\$284,876		(\$8,077)	-2.8%
11	General Service-High Voltage-Energy TOD	9A	\$3,293		(\$93)	-2.8%
12	<i>Subtotal Schedule 9</i>		<u>\$288,169</u>	<u>13.4%</u>	<u>(\$8,170)</u>	<u>-2.8%</u>
13	Irrigation	10	\$13,210		(\$541)	-4.1%
14	Irrigation-Time of Day	10TOD	\$1,286		(\$53)	-4.1%
15	<i>Subtotal Irrigation</i>		<u>\$14,496</u>	<u>1.0%</u>	<u>(\$594)</u>	<u>-4.1%</u>
16	Electric Furnace	21	\$476		(\$15)	-3.1%
17	General Service-Distribution-Small	23	\$139,103	7.0%	(\$4,272)	-3.1%
18	Back-up, Maintenance, & Supplementary	31	\$4,576		(\$144)	-3.1%
19	Contract 1	--	\$27,959	1.6%	(\$969)	-3.5%
20	Contract 2	--	\$35,063	1.8%	(\$1,067)	-3.0%
21	Contract 3	--	\$30,035		\$0	0.0%
22	AGA/Revenue Credit	--	\$2,928			
23	<b>Total Commercial &amp; Industrial &amp; OSPA</b>		<u>\$1,239,372</u>		<u>(\$36,031)</u>	<u>-2.9%</u>
<b>Public Street Lighting</b>						
24	Security Area Lighting	7	\$2,999		(\$59)	-2.0%
25	Street Lighting - Company Owned	11	\$4,979		(\$98)	-2.0%
26	Street Lighting - Customer Owned	12	\$4,145		(\$82)	-2.0%
27	Metered Outdoor Lighting	15	\$1,235	0.04%	(\$26)	-2.1%
28	Traffic Signal Systems	15	\$682	0.03%	(\$20)	-2.9%
29	<i>Subtotal Public Street Lighting</i>		<u>\$14,040</u>	<u>0.4%</u>	<u>(\$285)</u>	<u>-2.0%</u>
30	Security Area Lighting-Contracts (PTL)	--	\$1			
31	AGA/Revenue Credit	--	\$5			
32	<b>Total Public Street Lighting</b>		<u>\$14,045</u>		<u>(\$285)</u>	<u>-2.0%</u>
33	<b>Total Sales to Ultimate Customers</b>		<u>\$1,938,306</u>	<u>100.0%</u>	<u>(\$61,000)</u>	<u>-3.1%</u>

<sup>1</sup> Rate Base Cost allocator from 2010 cost of service study.

Tax Act Rev	(\$61,000)	
%	-3.1%	
Adj	100.0%	0.0



**Rate Design**  
**Rocky Mountain Power - State of Utah**  
**Blocking Based on Adjusted Actuals and Forecasted Loads**  
**Base Period 12 Months Ending June 2013**  
**Forecast Test Period 12 Months Ending June 2015**

	Forecasted Units	Step 2 - 9/1/2015		Proposed TAA	
		Present Price	Revenue Dollars	Price	Revenue Dollars
<b>Schedule No. 1- Residential Service</b>					
Total Customer	8,511,800				
Customer Charge - 1 Phase	8,398,777	\$6.00	\$50,392,662		
Customer Charge - 3 Phase	14,094	\$12.00	\$169,128		
Net Metering Facilities Charge	23,932				
First 400 kWh (May-Sept)	1,274,636,742	8.8498 ¢	\$112,802,802	-3.91%	(\$4,410,879)
Next 600 kWh (May-Sept)	1,040,456,011	11.5429 ¢	\$120,098,797	-3.91%	(\$4,696,172)
All add'l kWh (May-Sept)	358,873,906	14.4508 ¢	\$51,860,150	-3.91%	(\$2,027,865)
All kWh (Oct-Apr)					
<i>First 400 kWh (Oct-Apr)</i>	1,613,094,234	8.8498 ¢	\$142,755,614	-3.91%	(\$5,582,111)
<i>All add'l kWh (Oct-Apr)</i>	1,704,644,903	10.7072 ¢	\$182,519,739	-3.91%	(\$7,136,991)
Minimum 1 Phase	98,763	\$8.00	\$790,104		
Minimum 3 Phase	166	\$16.00	\$2,656		
Minimum Seasonal	0	\$96.00	\$0		
kWh in Minimum	501,472				
kWh in Minimum - Summer	223,485				
kWh in Minimum - Winter	277,987				
Unbilled	0		\$0		
Total	5,992,207,269		\$661,391,652		(\$23,854,018)

**Schedule No. 3- Residential Service - Low Income Lifeline Program**

Total Customer	370,465				
Customer Charge - 1 Phase	369,457	\$6.00	\$2,216,742		
Customer Charge - 3 Phase	257	\$12.00	\$3,084		
Net Metering Facilities Charge	0				
First 400 kWh (May-Sept)	47,435,117	8.8498 ¢	\$4,197,913	-3.91%	(\$164,149)
Next 600 kWh (May-Sept)	31,907,309	11.5429 ¢	\$3,683,029	-3.91%	(\$144,016)
All add'l kWh (May-Sept)	10,205,740	14.4508 ¢	\$1,474,811	-3.91%	(\$57,669)
All kWh (Oct-Apr)					
<i>First 400 kWh (Oct-Apr)</i>	64,598,419	8.8498 ¢	\$5,716,831	-3.91%	(\$223,543)
<i>All add'l kWh (Oct-Apr)</i>	54,308,077	10.7072 ¢	\$5,814,874	-3.91%	(\$227,377)
Minimum 1 Phase	751	\$8.00	\$6,008		
Minimum 3 Phase	0	\$16.00	\$0		
Minimum Seasonal	0	\$96.00	\$0		
kWh in Minimum	4,249				
kWh in Minimum - Summer	2,043				
kWh in Minimum - Winter	2,206				
Unbilled	0		\$0		
Total	208,458,911		\$23,113,292		(\$816,753)

**Schedule No. 2 - Residential Service - Optional Time-of-Day**

Total Customer	5,364				
Customer Charge - 1 Phase	5,243	\$6.00	\$31,458		
Customer Charge - 3 Phase	0	\$12.00	\$0		
Net Metering Facilities Charge	1,185				
On-Peak kWh (May - Sept)	280,149	4.3560 ¢	\$12,203		
Off-Peak kWh (May - Sept)	954,590	(1.6334) ¢	(\$15,592)		

First 400 kWh (May-Sept)	675,062	8.8498 ¢	\$59,742	-3.91%	(\$2,336)
Next 600 kWh (May-Sept)	474,415	11.5429 ¢	\$54,761	-3.91%	(\$2,141)
All add'l kWh (May-Sept)	185,128	14.4508 ¢	\$26,752	-3.91%	(\$1,046)
All kWh (Oct-Apr)					
<i>First 400 kWh (Oct-Apr)</i>	912,816	8.8498 ¢	\$80,782	-3.91%	(\$3,159)
<i>All add'l kWh (Oct-Apr)</i>	937,823	10.7072 ¢	\$100,415	-3.91%	(\$3,926)
Minimum 1 Phase	121	\$8.00	\$968		
Minimum 3 Phase	0	\$16.00	\$0		
Minimum Seasonal	0	\$96.00	\$0		
kWh in Minimum	428				
kWh in Minimum - Summer	118				
kWh in Minimum - Winter	310				
Unbilled	0		\$0		
Total	<u>3,185,671</u>		<u>\$351,489</u>		<u>(\$12,609)</u>

**Schedule No. 6 - Composite**

Customer Charge	156,864	\$54.00	\$8,470,675		
All kW (May - Sept)	7,568,683				
All kW (Oct - Apr)	9,009,450				
Voltage Discount	679,134	(\$0.96)	(\$651,969)		
<i>Facilities kW</i>	<i>16,578,133</i>	<i>\$4.04</i>	<i>\$66,975,657</i>		
<i>All kW (May - Sept)</i>	<i>7,568,683</i>	<i>\$14.62</i>	<i>\$110,654,145</i>	-3.60%	(\$3,986,186)
<i>All kW (Oct - Apr)</i>	<i>9,009,450</i>	<i>\$10.91</i>	<i>\$98,293,100</i>	-3.60%	(\$3,540,894)
All kWh	5,783,806,261				
kWh (May - Sept)	2,573,577,152	3.8127 ¢	\$98,122,776	-3.60%	(\$3,534,758)
kWh (Oct - Apr)	3,210,229,109	3.5143 ¢	\$112,817,082	-3.60%	(\$4,064,103)
Seasonal Service	0	\$648.00	\$0		
Unbilled	0		\$0		
Total	<u>5,783,806,261</u>		<u>\$494,681,466</u>		<u>(\$15,125,942)</u>

**Schedule No. 6B - Demand Time-of-Day Option - Composite**

Customer Charge	438	\$54.00	\$23,652		
All On-peak kW (May - Sept)	6,224				
All On-peak kW (Oct - Apr)	4,264				
Voltage Discount	0	(\$0.96)	\$0		
<i>Facilities kW</i>	<i>10,488</i>	<i>\$4.04</i>	<i>\$42,372</i>		
<i>All On-peak kW (May - Sept)</i>	<i>6,224</i>	<i>\$14.62</i>	<i>\$90,995</i>	-3.60%	(\$3,278)
<i>All On-peak kW (Oct - Apr)</i>	<i>4,264</i>	<i>\$10.91</i>	<i>\$46,520</i>	-3.60%	(\$1,676)
All kWh	3,907,497				
kWh (May-Sept)	1,628,124	3.8127 ¢	\$62,075	-3.60%	(\$2,236)
kWh (Oct-Apr)	2,279,373	3.5143 ¢	\$80,104	-3.60%	(\$2,886)
Seasonal Service	0	\$648.00	\$0		
Unbilled	0		\$0		
Total	<u>3,907,497</u>		<u>\$345,718</u>		<u>(\$10,076)</u>

**Schedule No. 6A - Energy Time-of-Day Option - Composite**

Customer Charge	27,307	\$54.00	\$1,474,578		
Facilities kW (May - Sept)	918,610	\$6.52	\$5,989,337		
Facilities kW (Oct - Apr)	1,059,783	\$5.47	\$5,797,013		
Voltage Discount	39,296	(\$0.61)	(\$23,971)		
On-Peak kWh (May - Sept)	62,251,233	11.9266 ¢	\$7,424,456	-4.99%	(\$370,169)
Off-Peak kWh (May - Sept)	59,556,790	3.5908 ¢	\$2,138,565	-4.99%	(\$106,625)
On-Peak kWh (Oct - Apr)	90,625,426	9.9693 ¢	\$9,034,721	-4.99%	(\$450,453)
Off-Peak kWh (Oct - Apr)	79,597,650	3.0060 ¢	\$2,392,705	-4.99%	(\$119,295)
Unbilled	0		\$0		
Total	<u>292,031,100</u>		<u>\$34,227,404</u>		<u>(\$1,046,542)</u>

**Schedule No. 7 - Security Area Lighting - Composite**

*MERCURY VAPOR LAMPS*

4,000 Lumen Energy Only	29	24	\$5.68	\$136	-1.98%	(\$3)
7,000 Lumen	1	45,001	\$16.38	\$737,116	-1.98%	(\$14,569)
7,000 Lumen Energy Only	28	0	\$8.05	\$0	-1.98%	\$0
20,000 Lumen	2	10,830	\$26.78	\$290,027	-1.98%	(\$5,732)
<b>SODIUM VAPOR LAMPS</b>						
5,600 Lumen New Pole	3	3,563	\$14.60	\$52,020	-1.98%	(\$1,028)
5,600 Lumen No New Pole	4	1,746	\$12.23	\$21,354	-1.98%	(\$422)
9,500 Lumen New Pole	5	23,403	\$15.47	\$362,044	-1.98%	(\$7,156)
9,500 Lumen No New Pole	6	23,123	\$13.31	\$307,767	-1.98%	(\$6,083)
16,000 Lumen New Pole	7	2,646	\$19.46	\$51,491	-1.98%	(\$1,018)
16,000 Lumen No New Pole	8	2,564	\$17.13	\$43,921	-1.98%	(\$868)
22,000 Lumen	9	114	\$21.07	\$2,402	-1.98%	(\$47)
27,500 Lumen New Pole	10	3,134	\$23.51	\$73,680	-1.98%	(\$1,456)
27,500 Lumen No New Pole	11	4,178	\$21.23	\$88,699	-1.98%	(\$1,753)
50,000 Lumen New Pole	12	1,248	\$28.30	\$35,318	-1.98%	(\$698)
50,000 Lumen No New Pole	13	2,456	\$25.99	\$63,831	-1.98%	(\$1,262)
<b>SODIUM VAPOR FLOOD LAMPS</b>						
16,000 Lumen New Pole	14	4,670	\$19.46	\$90,878	-1.98%	(\$1,796)
16,000 Lumen No New Pole	15	4,976	\$17.13	\$85,239	-1.98%	(\$1,685)
27,500 Lumen New Pole	16	1,102	\$23.51	\$25,908	-1.98%	(\$512)
27,500 Lumen No New Pole	17	1,570	\$21.23	\$33,331	-1.98%	(\$659)
50,000 Lumen New Pole	18	9,734	\$28.30	\$275,472	-1.98%	(\$5,445)
50,000 Lumen No New Pole	19	11,772	\$25.99	\$305,954	-1.98%	(\$6,047)
<b>METAL HALIDE LAMPS</b>						
12,000 Lumen New Pole	20	0	\$29.40	\$0	-1.98%	\$0
12,000 Lumen No New Pole	21	265	\$21.79	\$5,774	-1.98%	(\$114)
19,500 Lumen New Pole	22	110	\$34.34	\$3,777	-1.98%	(\$75)
19,500 Lumen No New Pole	23	97	\$27.43	\$2,661	-1.98%	(\$53)
32,000 Lumen New Pole	24	469	\$36.69	\$17,208	-1.98%	(\$340)
32,000 Lumen No New Pole	25	630	\$29.72	\$18,724	-1.98%	(\$370)
107,000 Lumen New Pole	26	24	\$57.58	\$1,382	-1.98%	(\$27)
107,000 Lumen No New Pole	27	60	\$49.10	\$2,946	-1.98%	(\$58)
Subtotal		159,509		\$2,999,060		(\$59,278)
kWh Included		12,440,931				
Unbilled		0		\$0		
Customers		8,046				
Total (kWh)		12,440,931		\$2,999,060		(\$59,278)

#### Schedule No. 8 - Composite

Customer Charge	3,282	\$70.00	\$229,740		
Facilities kW	5,010,201	\$4.76	\$23,848,557		
On-Peak kW (May - Sept)	2,097,818	\$15.56	\$32,642,048	-3.17%	(\$1,036,187)
On-Peak kW (Oct - Apr)	2,761,958	\$11.19	\$30,906,310	-3.17%	(\$981,088)
Voltage Discount	2,132,830	(\$1.13)	(\$2,410,098)		
On-Peak kWh (May - Sept)	260,094,535	5.0474 ¢	\$13,128,012	-3.17%	(\$416,735)
On-Peak kWh (Oct - Apr)	625,992,212	3.9511 ¢	\$24,733,578	-3.17%	(\$785,141)
Off-Peak kWh	1,300,960,579	3.4002 ¢	\$44,235,262	-3.17%	(\$1,404,201)
Unbilled	0		\$0		
Total	2,187,047,326		\$167,313,409		(\$4,623,351)

#### Schedule No. 9 - Composite

Customer Charge	1,791	\$259.00	\$463,869		
Facilities kW	9,053,509	\$2.22	\$20,098,790		
On-Peak kW (May - Sept)	3,715,246	\$13.96	\$51,864,834	-3.07%	(\$1,591,949)
On-Peak kW (Oct - Apr)	5,150,021	\$9.47	\$48,770,699	-3.07%	(\$1,496,977)
On-Peak kWh (May-Sept)	507,349,132	4.6531 ¢	\$23,607,462	-3.07%	(\$724,612)
On-Peak kWh (Oct-Apr)	1,382,941,034	3.4989 ¢	\$48,387,724	-3.07%	(\$1,485,222)
Off-Peak kWh	3,137,145,375	2.9225 ¢	\$91,683,074	-3.07%	(\$2,814,137)
Unbilled	0		\$0		

Total	5,027,435,541		\$284,876,452		(\$8,112,895)
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**Schedule No. 9A - Energy TOD - Composite**

Customer Charge	108	\$259.00	\$27,972		
Facilities Charge per kW	235,118	\$2.22	\$521,962		
On-Peak kWh	23,805,248	8.6029 ¢	\$2,047,942	-3.40%	(\$69,705)
Off-Peak kWh	18,785,533	3.6981 ¢	\$694,708	-3.40%	(\$23,646)
Unbilled	0		\$0		
Total	42,590,781		\$3,292,584		(\$93,351)

**Schedule No. 10 - Irrigation**

Annual Cust. Serv. Chg. - Primary	6	\$125.00	\$750		
Annual Cust. Serv. Chg. - Secondary	2,778	\$38.00	\$105,577		
Monthly Cust. Serv. Chg.	12,565	\$14.00	\$175,910		
All On-Season kW	323,633	\$7.33	\$2,372,230	-4.21%	(\$99,797)
Voltage Discount	10,067	(\$2.05)	(\$20,637)		
First 30,000 kWh	71,130,178	7.2971 ¢	\$5,190,440	-4.21%	(\$218,355)
All add'l kWh	51,830,436	5.3936 ¢	\$2,795,526	-4.21%	(\$117,604)
Total On Season	122,960,614		\$10,619,796		(\$435,756)
Post Season					
Customer Charge	5,886	\$14.00	\$82,404		
kWh	50,172,778	4.9983 ¢	\$2,507,786	-4.21%	(\$105,499)
Total Post Season	50,172,778		\$2,590,190		(\$105,499)
Unbilled	0		\$0		
TOTAL RATE 10	173,133,392		\$13,209,986		(\$541,256)

**Schedule No. 10-TOD**

Annual Cust. Serv. Chg. - Primary	5	\$125.00	\$625		
Annual Cust. Serv. Chg. - Secondary	256	\$38.00	\$9,728		
Monthly Cust. Serv. Chg.	1,143	\$14.00	\$16,002		
All On-Season kW	37,541	\$7.33	\$275,176	-4.21%	(\$11,576)
Voltage Discount kW	1,037	(\$2.05)	(\$2,126)		
On-Peak kWh	2,262,299	14.4164 ¢	\$326,142	-4.21%	(\$13,720)
Off-Peak kWh	8,574,215	4.1542 ¢	\$356,190	-4.21%	(\$14,984)
Total On Season	10,836,514		\$981,737		(\$40,281)
Post Season					
Customer Charge	570	\$14.00	\$7,980		
kWh	5,920,094	4.9983 ¢	\$295,904	-4.21%	(\$12,448)
Total Post Season	5,920,094		\$303,884		(\$12,448)
Unbilled	0		\$0		
TOTAL RATE 10-TOD	16,756,608		\$1,285,621		(\$52,729)

**Schedule No. 11 - Street Lighting - Company-Owned System**

*Sodium Vapor Lamps (HPS)*

5,600 Lumen - Functional	34,757	\$11.80	\$410,133	-1.98%	(\$8,106)
9,500 Lumen - Functional	218,738	\$12.78	\$2,795,472	-1.98%	(\$55,254)
9,500 Lumen - Functional @ 90%	132	\$11.50	\$1,518	-1.98%	(\$30)
9,500 Lumen - S1	409	\$46.54	\$19,035	-1.98%	(\$376)
9,500 Lumen - S2	60	\$38.05	\$2,283	-1.98%	(\$45)
16,000 Lumen - Functional	21,158	\$16.94	\$358,417	-1.98%	(\$7,084)
16,000 Lumen - Functional @ 90%	96	\$15.25	\$1,464	-1.98%	(\$29)
16,000 Lumen - S1	2,421	\$47.83	\$115,796	-1.98%	(\$2,289)
16,000 Lumen - S2	886	\$39.34	\$34,855	-1.98%	(\$689)
27,500 Lumen - Functional	26,178	\$21.14	\$553,403	-1.98%	(\$10,938)
27,500 Lumen - Functional @ 90%	12	\$19.03	\$228	-1.98%	(\$5)
27,500 Lumen - S1	1,253	\$51.48	\$64,504	-1.98%	(\$1,275)
27,500 Lumen - S2	0	\$43.01	\$0	-1.98%	\$0
50,000 Lumen - Functional	11,406	\$26.02	\$296,784	-1.98%	(\$5,866)
125,000 Lumen	0	\$51.54	\$0	-1.98%	\$0

<i>Metal Halide Lamps (MH)</i>						
9,000 Lumen - S1	36	\$48.74	\$1,755	-1.98%		(\$35)
9,000 Lumen - S2	602	\$40.27	\$24,243	-1.98%		(\$479)
12,000 Lumen - Functional	127	\$20.13	\$2,557	-1.98%		(\$51)
12,000 Lumen - S1	0	\$50.65	\$0	-1.98%		\$0
12,000 Lumen - S2	1,598	\$42.17	\$67,388	-1.98%		(\$1,332)
19,500 Lumen - Functional	386	\$22.13	\$8,542	-1.98%		(\$169)
19,500 Lumen - S1	41	\$53.69	\$2,201	-1.98%		(\$44)
19,500 Lumen - S2	365	\$45.20	\$16,498	-1.98%		(\$326)
32,000 Lumen - Functional	61	\$25.78	\$1,573	-1.98%		(\$31)
32,000 Lumen - S1	0	\$55.33	\$0	-1.98%		\$0
32,000 Lumen - S2	0	\$46.86	\$0	-1.98%		\$0
<i>Mercury Vapor Lamps (No New Service) (MV)</i>						
4,000 Lumen	3,279	\$11.09	\$36,364	-1.98%		(\$719)
7,000 Lumen	9,152	\$13.83	\$126,572	-1.98%		(\$2,502)
10,000 Lumen	186	\$19.40	\$3,608	-1.98%		(\$71)
10,000 Lumen @ 90%	0	\$17.46	\$0	-1.98%		\$0
20,000 Lumen	996	\$24.43	\$24,332	-1.98%		(\$481)
<i>Incandescent Lamps (No New Service) (INC)</i>						
500 Lumen	0	\$11.99	\$0	-1.98%		\$0
600 Lumen	145	\$4.24	\$615	-1.98%		(\$12)
2,500 Lumen	32	\$17.11	\$548	-1.98%		(\$11)
4,000 Lumen	162	\$20.43	\$3,310	-1.98%		(\$65)
6,000 Lumen	161	\$23.82	\$3,835	-1.98%		(\$76)
10,000 Lumen	24	\$31.47	\$755	-1.98%		(\$15)
<i>Fluorescent Lamps (No New Service) (FLOUR)</i>						
21,000 Lumen	12	\$27.85	\$334	-1.98%		(\$7)
<i>Special Service (No New Service)</i>						
50,000 Lumen - Flood	12	\$39.04	\$468	-1.98%		(\$9)
Subtotal	334,883		\$4,979,390			(\$98,419)
kWh Included	16,496,197					
Customers	809					
Unbilled	0		\$0			
Total	16,496,197		\$4,979,390			(\$98,419)

## Schedule No. 12 - Street Lighting - Customer-Owned System

### 1. Energy Only, No Maintenance

#### *High Pressures Sodium Vapor Lamps*

5,600 Lumen	103,438	\$1.83	\$189,292	-1.98%		(\$3,741)
9,500 Lumen	159,006	\$2.50	\$397,515	-1.98%		(\$7,857)
16,000 Lumen	134,332	\$3.66	\$491,655	-1.98%		(\$9,718)
27,500 Lumen	48,293	\$6.52	\$314,870	-1.98%		(\$6,224)
50,000 Lumen	65,553	\$10.02	\$656,841	-1.98%		(\$12,983)

#### *Metal Halide Lamps*

9,000 Lumen	6,583	\$2.55	\$16,787	-1.98%		(\$332)
12,000 Lumen	18,818	\$4.46	\$83,928	-1.98%		(\$1,659)
19,500 Lumen	28,281	\$6.17	\$174,494	-1.98%		(\$3,449)
32,000 Lumen	27,914	\$9.77	\$272,720	-1.98%		(\$5,390)

#### *Non-listed Luminaries kWh*

	10,059,553	6.5279 ¢	\$656,678	-1.98%		(\$12,979)
Subtotal kWh	49,653,570		\$3,254,780			(\$64,332)
Unbilled						
Total	49,653,570		\$3,254,780			(\$64,332)
Customer	519					

### **2a - Partial Maintenance (No New Service)**

#### *Incandescent Lamps*

2,500 Lumen or Less	76	\$8.96	\$681	-1.98%		(\$13)
4,000 Lumen	91	\$12.19	\$1,109	-1.98%		(\$22)

#### *Mercury Vapor Lamps*

4,000 Lumen	47	\$4.64	\$218	-1.98%		(\$4)
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7,000 Lumen	546	\$7.00	\$3,822	-1.98%	(\$76)
20,000 Lumen	140	\$13.33	\$1,866	-1.98%	(\$37)
54,000 Lumen	0	\$28.38	\$0	-1.98%	\$0
<i>High Pressure Sodium Vapor Lamps</i>					
5,600 Lumen	34,609	\$4.08	\$141,205	-1.98%	(\$2,791)
9,500 Lumen	15,632	\$5.37	\$83,944	-1.98%	(\$1,659)
9,500 Lumen - Decorative	8,817	\$6.96	\$61,366	-1.98%	(\$1,213)
16,000 Lumen	2,548	\$6.52	\$16,613	-1.98%	(\$328)
16,000 Lumen - Decorative	799	\$8.27	\$6,608	-1.98%	(\$131)
22,000 Lumen	0	\$8.26	\$0	-1.98%	\$0
27,500 Lumen	5,601	\$9.59	\$53,714	-1.98%	(\$1,062)
27,500 Lumen - Decorative	143	\$11.93	\$1,706	-1.98%	(\$34)
50,000 Lumen	10,133	\$14.00	\$141,862	-1.98%	(\$2,804)
50,000 Lumen - Decorative	157	\$15.56	\$2,443	-1.98%	(\$48)
<i>Metal Halide Lamps</i>					
9,000 Lumen - Decorative	702	\$9.19	\$6,451	-1.98%	(\$128)
12,000 Lumen	1,617	\$13.57	\$21,943	-1.98%	(\$434)
12,000 Lumen - Decorative	225	\$11.09	\$2,495	-1.98%	(\$49)
19,500 Lumen	518	\$13.71	\$7,102	-1.98%	(\$140)
19,500 Lumen - Decorative	6,034	\$14.13	\$85,260	-1.98%	(\$1,685)
32,000 Lumen	544	\$14.58	\$7,932	-1.98%	(\$157)
32,000 Lumen - Decorative	669	\$15.79	\$10,564	-1.98%	(\$209)
<i>Fluorescent Lamps</i>					
1,000 Lumen	0	\$3.75	\$0	-1.98%	\$0
21,800 Lumen	83	\$13.92	\$1,155	-1.98%	(\$23)
<i>Subtotal kWh</i>	<u>5,219,065</u>		<u>\$660,059</u>		<u>(\$13,046)</u>
<i>Unbilled</i>					
<i>Total</i>	<u>5,219,065</u>		<u>\$660,059</u>		<u>(\$13,046)</u>
<i>Customer</i>	221				
<b>2b - Full Maintenance (No New Service)</b>					
<i>Incandescent Lamps</i>					
6,000 Lumen	36	\$17.73	\$638	-1.98%	(\$13)
10,000 Lumen	12	\$23.40	\$281	-1.98%	(\$6)
<i>Mercury Vapor Lamps</i>					
7,000 Lumen	42	\$8.03	\$337	-1.98%	(\$7)
20,000 Lumen	0	\$15.30	\$0	-1.98%	\$0
54,000 Lumen	96	\$32.48	\$3,118	-1.98%	(\$62)
<i>Sodium Vapor Lamps</i>					
5,600 Lumen	4,275	\$4.68	\$20,007	-1.98%	(\$395)
9,500 Lumen	14,686	\$6.16	\$90,466	-1.98%	(\$1,788)
16,000 Lumen	1,259	\$7.47	\$9,405	-1.98%	(\$186)
22,000 Lumen	0	\$9.44	\$0	-1.98%	\$0
27,500 Lumen	2,408	\$10.99	\$26,464	-1.98%	(\$523)
50,000 Lumen	1,967	\$16.02	\$31,511	-1.98%	(\$623)
<i>Metal Halide Lamps</i>					
12,000 Lumen	1,188	\$15.58	\$18,509	-1.98%	(\$366)
19,500 Lumen	724	\$15.73	\$11,389	-1.98%	(\$225)
32,000 Lumen	881	\$16.72	\$14,730	-1.98%	(\$291)
107,000 Lumen	96	\$33.05	\$3,173	-1.98%	(\$63)
<i>Subtotal kWh</i>	<u>1,644,140</u>		<u>\$230,028</u>		<u>(\$4,547)</u>
<i>Unbilled</i>					
<i>Total</i>	<u>1,644,140</u>		<u>\$230,028</u>		<u>(\$4,547)</u>
<i>Customer</i>	99				
kWh Street Lighting	<u>56,516,774</u>		<u>\$4,144,867</u>		<u>(\$81,925)</u>
Customers	839				
Unbilled			\$0		
<b>Total</b>	<u><u>56,516,774</u></u>		<u><u>\$4,144,867</u></u>		<u><u>(\$81,925)</u></u>

**Schedule 15.1 - Metered Outdoor Nighttime Lighting - Composite**

Annual Facility Charge	20,286	\$11.00	\$223,146		
Annual Customer Charge	497	\$72.50	\$36,033		
Annual Minimum Charge	0.0	\$127.50	\$0		
Monthly Customer Charge	6,182	\$6.20	\$38,328		
All kWh	17,536,445	5.3437 ¢	\$937,095	-2.80%	(\$26,249)
Unbilled	0		\$0		
<b>Total</b>	<b>17,536,445</b>		<b>\$1,234,602</b>		<b>(\$26,249)</b>

**Schedule 15.2 - Traffic Signal Systems - Composite**

Customer Charge	29,596	\$5.50	\$162,778		
All kWh	6,177,947	8.4049 ¢	\$519,250	-3.76%	(\$19,535)
Unbilled	0		\$0		
<b>Total</b>	<b>6,177,947</b>		<b>\$682,028</b>		<b>(\$19,535)</b>

**Schedule No. 21 - Electric Furnace Operations - Limited Service - Industrial**Primary Voltage

Customer Charge	36	\$127.00	\$4,572		
Charge per kW (Facilities)	10,893	\$4.30	\$46,840		
First 100,000 kWh	423,833	6.8447 ¢	\$29,010	-6.88%	(\$1,995)
All add'l kWh	0	5.7472 ¢	\$0	-6.88%	\$0
Unbilled	0		\$0		
<b>Subtotal</b>	<b>423,833</b>		<b>\$80,422</b>		<b>(\$1,995)</b>

44KV or Higher

Customer Charge	24	\$127.00	\$3,048		
Charge per kW (Facilities)	47,371	\$4.30	\$203,695		
First 100,000 kWh	2,660,898	5.3851 ¢	\$143,292	-6.88%	(\$9,855)
All add'l kWh	963,969	4.7169 ¢	\$45,469	-6.88%	(\$3,127)
Unbilled	0		\$0		
<b>Subtotal</b>	<b>3,624,867</b>		<b>\$395,504</b>		<b>(\$12,983)</b>
<b>Total</b>	<b>4,048,700</b>		<b>\$475,926</b>		<b>(\$14,978)</b>

**Schedule No. 23 - Composite**

Customer Charge	992,018	\$10.00	\$9,920,180		
kW over 15 (May - Sept)	387,746	\$8.65	\$3,354,003	-3.31%	(\$110,918)
kW over 15 (Oct - Apr)	347,761	\$8.70	\$3,025,521	-3.31%	(\$100,055)
Voltage Discount	7,029	(\$0.48)	(\$3,374)		
First 1,500 kWh (May - Sept)	295,977,608	11.7336 ¢	\$34,728,829	-3.31%	(\$1,148,495)
All Add'l kWh (May - Sept)	309,000,008	6.5783 ¢	\$20,326,948	-3.31%	(\$672,219)
First 1,500 kWh (Oct - Apr)	424,820,226	10.8000 ¢	\$45,880,584	-3.31%	(\$1,517,287)
All Add'l kWh (Oct - Apr)	361,090,369	6.0567 ¢	\$21,870,160	-3.31%	(\$723,254)
Seasonal Service	0	\$120.00	\$0		
Unbilled	0		\$0		
<b>Total</b>	<b>1,390,888,211</b>		<b>\$139,102,851</b>		<b>(\$4,272,228)</b>

**Schedule No.31 - Composite**Secondary Voltage

Customer Charge per month	0	\$133.00	\$0		
Facilities Charge, per kW month	0	\$5.60	\$0		
Back-up Power Charge					
Regular, per On-Peak kW day	0				
May - Sept	0	\$0.88	\$0		
Oct - Apr	0	\$0.62	\$0		
Maintenance, per On-Peak kW day	0				
May - Sept	0	\$0.440	\$0		
Oct - Apr	0	\$0.310	\$0		
Excess Power, per kW month	0				
May - Sept	0	\$40.81	\$0		
Oct - Apr	0	\$32.04	\$0		

Primary Voltage

Customer Charge per month	24	\$605.00	\$14,520		
Facilities Charge, per kW month	38,791	\$4.46	\$173,008		
Back-up Power Charge					
Regular, per On-Peak kW day	195,683				
May - Sept	79,030	\$0.86	\$67,966		
Oct - Apr	116,653	\$0.60	\$69,992		
Maintenance, per On-Peak kW day	24,254				
May - Sept	24,254	\$0.430	\$10,429		
Oct - Apr	0	\$0.300	\$0		
Excess Power, per kW month	30				
May - Sept	0	\$38.54	\$0		
Oct - Apr	30	\$29.77	\$893		

Transmission Voltage

Customer Charge per month	24	\$678.00	\$16,272		
Facilities Charge, per kW month	153,429	\$2.63	\$403,518		
Back-up Power Charge					
Regular, per On-Peak kW day	391,585				
May - Sept	239,920	\$0.76	\$182,339		
Oct - Apr	151,665	\$0.51	\$77,349		
Maintenance, per On-Peak kW day	0				
May - Sept	0	\$0.380	\$0		
Oct - Apr	0	\$0.255	\$0		
Excess Power, per kW month	0				
May - Sept	0	\$32.35	\$0		
Oct - Apr	0	\$23.36	\$0		

Subtotal			\$1,016,286		\$0
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Supplemental billed at Schedule 6/8/9 rate

**Schedule 8**

Facilities kW	16,065	\$4.76	\$76,469		
On-Peak kW (May - Sept)	0	\$15.56	\$0	-3.17%	\$0
On-Peak kW (Oct - Apr)	16,065	\$11.19	\$179,767	-3.17%	(\$5,707)
Voltage Discount	16,065	(\$1.13)	(\$18,153)		
On-Peak kWh (May - Sept)	1,044,794	5.0474 ¢	\$52,735	-3.17%	(\$1,674)
On-Peak kWh (Oct - Apr)	3,934,668	3.9511 ¢	\$155,463	-3.17%	(\$4,935)
Off-Peak kWh	5,030,285	3.4002 ¢	\$171,040	-3.17%	(\$5,429)

**Schedule 9**

Facilities kW	103,313	\$2.22	\$229,355		
On-Peak kW (May - Sept)	49,491	\$13.96	\$690,894	-3.07%	(\$21,206)
On-Peak kW (Oct - Apr)	50,080	\$9.47	\$474,258	-3.07%	(\$14,557)
On-Peak kWh (May-Sept)	7,647,176	4.6531 ¢	\$355,831	-3.07%	(\$10,922)
On-Peak kWh (Oct-Apr)	10,898,121	3.4989 ¢	\$381,314	-3.07%	(\$11,704)
Off-Peak kWh	27,727,401	2.9225 ¢	\$810,333	-3.07%	(\$24,873)

Subtotal			\$3,559,306		(\$101,007)
Unbilled	0		\$0		
Total (Aggregated)	56,282,445		\$4,575,592		(\$101,007)

**Contract 1**

Fixed Customer Charge	12		\$2,455		
Customer Charge			\$1,757,447.77		
kW High Load Hours	949,050		\$9,607,156	-3.70%	(\$355,475)
kWh High Load Hours	237,232,647		\$8,613,813	-3.70%	(\$318,720)
kWh Low Load Hours	298,488,523		\$7,977,879	-3.70%	(\$295,190)
Total	535,721,170		\$27,958,751		(\$969,386)

**Contract 2**

Customer Charge	12				
Interruptible kWh	795,798,676		\$35,062,890	-3.04%	(\$1,067,474)
Total	795,798,676		\$35,062,890		(\$1,067,474)



**Contract 3**

Customer Charge	12		\$8,136	
Facilities Charge per kW - Back-Up	422,498		\$921,045	
kW Back-Up				
Regular, per On-Peak kW day	3,435,490			
May - Sept	3,253,488		\$1,673,920	
Oct - Apr	182,002		\$93,640	
Maintenance, per On-Peak kW day	0			
May - Sept			\$0	
Oct - Apr			\$0	
Excess Power, per kW month	0			
May - Sept			\$0	
Oct - Apr			\$0	
kW Supplemental				
On-Peak kW (May - Sept)	24,807		\$346,306	\$0
On-Peak kW (Oct - Apr)	765,402		\$7,248,357	\$0
kWh Supplemental				
On-Peak kWh (May-Sept)	22,796,861	¢	\$1,060,761	\$0
On-Peak kWh (Oct-Apr)	204,228,863	¢	\$7,145,764	\$0
Off-Peak kWh	394,783,609	¢	\$11,537,551	\$0
Total	<u>621,809,333</u>		<u>\$30,035,480</u>	<u>\$0</u>

**Lighting Contract - Post Top Lighting - Composite**

Energy Only Res	60	\$2.18	\$131	
Energy Only Non-Res	207	\$2.1858	\$452	
Subtotal	<u>267</u>		<u>\$583</u>	
KWH Included	7,737			
Customers	5			
Unbilled	0			
Total	<u>7,737</u>		<u>\$583</u>	<u>\$0</u>

**Annual Guarantee Adjustment**

Residential			\$33,040	
Commercial			\$2,726,578	
Industrial			(\$5,447)	
Irrigation			\$206,563	
Public Street & Highway Lighting			\$4,662	
Other Sales Public Authorities			\$0	
Total AGA			<u>\$2,965,396</u>	<u>\$0</u>

<b>TOTAL - ALL CLASSES</b>	<u>23,244,284,922</u>		<u>\$1,938,306,489</u>	<u>(\$61,000,000)</u>
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**Table A**  
**Rocky Mountain Power**  
**Estimated Effect of Proposed Changes**  
**on Revenues from Electric Sales to Ultimate Consumers in Utah**  
**Base Period 12 Months Ending June 2013**  
**Forecast Test Period 12 Months Ending June 2015**

Line No.	Description (1)	Sch No. (2)	No. of Customers Forecast (3)	MWh Forecast (4)	Present Revenue (\$000)			Proposed Revenue (\$000)			Change			
					Base (5)	TAA (6)	Net (7)	Base (8)	TAA (9)	Net (10)	Base (\$000) (11)	Net (%) (12)	Base (\$000) (13)	Net (%) (14)
<b>Residential</b>														
1	Residential	1,3	740,189	6,200,666	\$684,505	\$0	\$684,505	\$684,505	-\$24,671	\$659,834	\$0	0.0%	(\$24,671)	-3.6%
2	Residential-Optional TOD	2	447	3,186	\$351	\$0	\$351	\$351	-\$13	\$339	\$0	0.0%	(\$13)	-3.6%
3	AGA/Revenue Credit	--			\$33		\$33	\$33		\$33	\$0	0.0%	\$0	0.0%
4	<b>Total Residential</b>		740,636	6,203,852	\$684,889	\$0	\$684,889	\$684,889	-\$24,683	\$660,206	\$0	0.0%	(\$24,683)	-3.6%
<b>Commercial &amp; Industrial &amp; OSPA</b>														
5	General Service-Distribution	6	13,072	5,783,806	\$494,681	\$0	\$494,681	\$494,681	-\$15,126	\$479,556	\$0	0.0%	(\$15,126)	-3.1%
6	General Service-Distribution-Energy TOD	6A	2,276	292,031	\$34,227	\$0	\$34,227	\$34,227	-\$1,047	\$33,181	\$0	0.0%	(\$1,047)	-3.1%
7	General Service-Distribution-Demand TOD	6B	37	3,907	\$346	\$0	\$346	\$346	-\$10	\$336	\$0	0.0%	(\$10)	-2.9%
8	<i>Subtotal Schedule 6</i>		15,385	6,079,745	\$529,255	\$0	\$529,255	\$529,255	-\$16,183	\$513,072	\$0	0.0%	(\$16,183)	-3.1%
9	General Service-Distribution > 1,000 kW	8	274	2,187,047	\$167,313	\$0	\$167,313	\$167,313	-\$4,623	\$162,690	\$0	0.0%	(\$4,623)	-2.8%
10	General Service-High Voltage	9	149	5,027,436	\$284,876	\$0	\$284,876	\$284,876	-\$8,113	\$276,764	\$0	0.0%	(\$8,113)	-2.8%
11	General Service-High Voltage-Energy TOD	9A	9	42,591	\$3,293	\$0	\$3,293	\$3,293	-\$93	\$3,199	\$0	0.0%	(\$93)	-2.8%
12	<i>Subtotal Schedule 9</i>		158	5,070,026	\$288,169	\$0	\$288,169	\$288,169	-\$8,206	\$279,963	\$0	0.0%	(\$8,206)	-2.8%
13	Irrigation	10	2,784	173,133	\$13,210	\$0	\$13,210	\$13,210	-\$541	\$12,669	\$0	0.0%	(\$541)	-4.1%
14	Irrigation-Time of Day	10TOD	261	16,757	\$1,286	\$0	\$1,286	\$1,286	-\$53	\$1,233	\$0	0.0%	(\$53)	-4.1%
15	<i>Subtotal Irrigation</i>		3,045	189,890	\$14,496	\$0	\$14,496	\$14,496	-\$594	\$13,902	\$0	0.0%	(\$594)	-4.1%
16	Electric Furnace	21	5	4,049	\$476	\$0	\$476	\$476	-\$15	\$461	\$0	0.0%	(\$15)	-3.1%
17	General Service-Distribution-Small	23	82,668	1,390,888	\$139,103	\$0	\$139,103	\$139,103	-\$4,272	\$134,831	\$0	0.0%	(\$4,272)	-3.1%
18	Back-up, Maintenance, & Supplementary	31	4	56,282	\$4,576	\$0	\$4,576	\$4,576	-\$101	\$4,475	\$0	0.0%	(\$101)	-2.2%
19	Contract 1	--	1	535,721	\$27,959	\$0	\$27,959	\$27,959	-\$969	\$26,989	\$0	0.0%	(\$969)	-3.5%
20	Contract 2	--	1	795,799	\$35,063	\$0	\$35,063	\$35,063	-\$1,067	\$33,995	\$0	0.0%	(\$1,067)	-3.0%
21	Contract 3	--	1	621,809	\$30,035	\$0	\$30,035	\$30,035	\$0	\$30,035	\$0	0.0%	\$0	0.0%
22	AGA/Revenue Credit	--			\$2,928		\$2,928	\$2,928		\$2,928	\$0	0.0%	\$0	0.0%
23	<b>Total Commercial &amp; Industrial &amp; OSPA</b>		101,542	16,931,257	\$1,239,372	\$0	\$1,239,372	\$1,239,372	-\$36,031	\$1,203,341	\$0	0.0%	(\$36,031)	-2.9%
<b>Public Street Lighting</b>														
24	Security Area Lighting	7	8,046	12,441	\$2,999	\$0	\$2,999	\$2,999	-\$59	\$2,940	\$0	0.0%	(\$59)	-2.0%
25	Street Lighting - Company Owned	11	809	16,496	\$4,979	\$0	\$4,979	\$4,979	-\$98	\$4,881	\$0	0.0%	(\$98)	-2.0%
26	Street Lighting - Customer Owned	12	839	56,517	\$4,145	\$0	\$4,145	\$4,145	-\$82	\$4,063	\$0	0.0%	(\$82)	-2.0%
27	Metered Outdoor Lighting	15	2,466	6,178	\$1,235	\$0	\$1,235	\$1,235	-\$26	\$1,208	\$0	0.0%	(\$26)	-2.1%
28	Traffic Signal Systems	15	515	17,536	\$682	\$0	\$682	\$682	-\$20	\$662	\$0	0.0%	(\$20)	-2.9%
29	<i>Subtotal Public Street Lighting</i>		12,675	109,168	\$14,040	\$0	\$14,040	\$14,040	-\$285	\$13,755	\$0	0.0%	(\$285)	-2.0%
30	Security Area Lighting-Contracts (PTL)	--	5	8	\$1	\$0	\$1	\$1	\$0	\$1	\$0	0.0%	\$0	0.0%
31	AGA/Revenue Credit	--			\$5		\$5	\$5		\$5	\$0	0.0%	\$0	0.0%
32	<b>Total Public Street Lighting</b>		12,680	109,176	\$14,045	\$0	\$14,045	\$14,045	-\$285	\$13,760	\$0	0.0%	(\$285)	-2.0%
33	<b>Total Sales to Ultimate Customers</b>		854,859	23,244,285	\$1,938,306	\$0	\$1,938,306	\$1,938,306	-\$61,000	\$1,877,306	\$0	0.0%	(\$61,000)	-3.1%

**Rocky Mountain Power  
Monthly Billing Comparison  
Schedule 1 - State of Utah  
Residential Service**

kWh	Summer				Winter			
	Monthly Billing <sup>1</sup>		Change		Monthly Billing <sup>1</sup>		Change	
	Present	Proposed	\$	%	Present	Proposed	\$	%
100	\$15.41	\$15.06	(\$0.35)	-2.3%	\$15.41	\$15.06	(\$0.35)	-2.3%
200	\$24.65	\$23.96	(\$0.69)	-2.8%	\$24.65	\$23.96	(\$0.69)	-2.8%
300	\$33.90	\$32.86	(\$1.04)	-3.1%	\$33.90	\$32.86	(\$1.04)	-3.1%
400	\$43.14	\$41.76	(\$1.38)	-3.2%	\$43.14	\$41.76	(\$1.38)	-3.2%
500	\$55.20	\$53.37	(\$1.83)	-3.3%	\$54.33	\$52.53	(\$1.80)	-3.3%
600	\$67.26	\$64.98	(\$2.28)	-3.4%	\$65.52	\$63.30	(\$2.22)	-3.4%
700	\$79.32	\$76.58	(\$2.74)	-3.5%	\$76.70	\$74.06	(\$2.64)	-3.4%
663 w					\$72.60	\$70.12	(\$2.48)	-3.4%
698 a	\$79.09	\$76.36	(\$2.73)	-3.5%	\$76.49	\$73.86	(\$2.63)	-3.4%
747 s	\$84.96	\$82.01	(\$2.95)	-3.5%				
800	\$91.38	\$88.19	(\$3.19)	-3.5%	\$87.89	\$84.83	(\$3.06)	-3.5%
900	\$103.44	\$99.80	(\$3.64)	-3.5%	\$99.08	\$95.60	(\$3.48)	-3.5%
1,000	\$115.50	\$111.41	(\$4.09)	-3.5%	\$110.26	\$106.37	(\$3.89)	-3.5%
1,100	\$130.60	\$125.94	(\$4.66)	-3.6%	\$121.45	\$117.14	(\$4.31)	-3.5%
1,200	\$145.70	\$140.48	(\$5.22)	-3.6%	\$132.64	\$127.90	(\$4.74)	-3.6%
1,300	\$160.80	\$155.01	(\$5.79)	-3.6%	\$143.82	\$138.67	(\$5.15)	-3.6%
1,400	\$175.89	\$169.54	(\$6.35)	-3.6%	\$155.01	\$149.44	(\$5.57)	-3.6%
1,500	\$190.99	\$184.07	(\$6.92)	-3.6%	\$166.20	\$160.21	(\$5.99)	-3.6%
2,000	\$266.48	\$256.74	(\$9.74)	-3.7%	\$222.13	\$214.05	(\$8.08)	-3.6%
3,000	\$417.46	\$402.06	(\$15.40)	-3.7%	\$334.00	\$321.73	(\$12.27)	-3.7%
4,000	\$568.44	\$547.39	(\$21.05)	-3.7%	\$445.86	\$429.40	(\$16.46)	-3.7%
5,000	\$719.41	\$692.72	(\$26.69)	-3.7%	\$557.73	\$537.08	(\$20.65)	-3.7%

<sup>1</sup> Including HELP, DSM, EBA, RBA, STEP and TAA adjustments.

w: Winter average usage; a: Annual average usage; s: Summer average usage.

Factor Table COS

Rocky Mountain Power  
 Cost of Service By Rate Schedule - COS Factor Summary  
 State of Utah  
 2010 Protocol (Non Wgt)  
 12 Months Ended Dec 2016  
 Class Allocation Factors

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Factor	DESCRIPTION	Dmd Split	Eng Split	Residential Sch 1	General Large Dist. Sch 6	General +1 MW Sch 8	Street & Area Lighting Sch. 7,11,12	General Trans Sch 9	Irrigation Sch 10	Traffic Signals Sch 15	Outdoor Lighting Sch 15	General Dist. Sch 23	Industrial Cust 1	Industrial Cust 2	Factor
F0	Direct Assignment														
F10	Coincident Peak, System	75% / 25%		0.33997	0.27918	0.08195	0.17687	0.00880	0.00027	0.00048	0.06702	0.02089	0.02250	1.0000000	
F11	Coincident Peak, System	50% / 50%		0.32396	0.27810	0.08390	0.00264	0.18587	0.00028	0.00058	0.06490	0.02219	0.02827	1.0000000	
F12	Coincident Peak, System	100% / 0%		0.35598	0.29025	0.08091	0.16787	0.00829	0.00025	0.00038	0.06914	0.01958	0.01673	1.0000000	
F20	12 Weighted Distribution Peaks			0.51945	0.30072	0.08154	0.00063	-	0.01503	0.00023	0.00015	0.08227	-	1.0000000	
F21	Transformers - NCP			0.61737	0.23085	0.05213	0.00371	-	0.01899	0.00014	0.00073	0.07609	-	1.0000000	
F22	Secondary Lines - NCP			0.89028	-	-	-	-	-	-	-	-	-	1.0000000	
F30	MWH @ Input			0.29183	0.27596	0.08779	0.00376	0.20387	0.00029	0.00063	0.00077	0.06065	0.02480	0.03982	1.0000000
F40	Average Customers			0.86618	0.01771	0.00028	0.01029	0.00019	0.00358	0.00297	0.00064	0.09815	0.00000	0.00000	1.0000000
F41	Weighted Customers Acct 902			0.84509	0.01818	0.02010	-	0.01334	0.00383	0.00290	0.00663	0.09576	0.00009	0.00009	1.0000000
F42	Weighted Customers Acct 903			0.87063	0.01915	0.00330	0.00935	0.00066	0.00346	0.00270	0.00059	0.09316	0.00000	0.00000	1.0000000
F43	Residential Split			1.00000	-	-	-	-	-	-	-	-	-	-	1.0000000
F44	Commercial Split			-	0.14623	0.00146	-	0.00035	-	-	-	0.85196	-	-	1.0000000
F45	Industrial / Irrigation Split			-	0.16565	0.01251	-	0.16223	0.39499	-	-	0.41036	0.00012	0.00012	1.0000000
F46	Lighting / OSPA Split			-	-	-	0.74026	-	-	0.21344	0.04629	-	-	-	1.0000000
F47	Wid Customers Acct 902 - Irrigation			0.84664	0.01621	0.02013	0.4026	0.01136	0.00200	0.00032	0.00079	0.06191	0.00009	0.00009	1.0000000
F48	Wid Customers Acct 903 - Irrigation			0.87207	0.01918	0.00330	0.00937	0.00066	0.00181	0.00270	0.00059	0.09331	0.00000	0.00000	1.0000000
F50	Contribution in Aid of Construction			0.37883	0.07480	0.01025	0.00652	0.03874	0.01202	0.00376	0.00607	0.46430	-	0.00472	1.0000000
F51	Security Deposits			0.15836	0.04757	0.11558	0.00039	0.39034	0.00203	0.00000	0.00000	0.28573	-	0.00287	1.0000000
F60	Meters			0.70179	0.10817	0.01721	-	0.00304	0.01122	0.00240	0.00052	0.12261	0.00287	0.00287	1.0000000
F70	Services			0.80560	0.06960	0.00569	-	-	0.00298	0.00065	0.11548	-	-	-	1.0000000
F80	Uncollectables			0.82823	0.00439	0.02364	-	0.04239	0.00017	-	-	0.02152	-	-	1.0000000
F85	Firm Sales - Utah Share			0.32937	0.28438	0.08298	0.00200	0.17893	0.00796	0.00028	0.00046	0.06759	0.02063	0.02541	1.0000000
F86	Non Firm Sales - Utah Share			0.32937	0.28438	0.08298	0.00200	0.17893	0.00796	0.00028	0.00046	0.06759	0.02063	0.02541	1.0000000
F87	Firm Purchases (Non-Seasonal) - Utah Share			0.33217	0.28138	0.08332	0.00227	0.18052	0.00791	0.00028	0.00053	0.06655	0.02109	0.02398	1.0000000
F88	Seasonal Purchases - Utah Share			-	-	-	-	-	-	-	-	-	-	-	1.0000000
F89	Non Firm Purchases - Utah Share			0.28945	0.27739	0.08779	0.00380	0.20324	0.01072	0.00032	0.00077	0.06087	0.02513	0.04051	1.0000000
F90	Coal (Non-Seasonal) - Utah Share			0.28990	0.27669	0.08793	0.00382	0.20417	0.00967	0.00032	0.00079	0.06191	0.02510	0.04051	1.0000000
F91	Seasonal Cholla Coal - Utah Share			0.29018	0.27623	0.08779	0.00380	0.20422	0.01018	0.00032	0.00078	0.06086	0.02513	0.04052	1.0000000
F92	(Non-Seasonal) - Utah Share			0.29395	0.27500	0.08752	0.00381	0.20388	0.00872	0.00033	0.00080	0.06125	0.02482	0.03997	1.0000000
F93	Seasonal CT Gas - Utah Share			0.29209	0.27553	0.08824	0.00383	0.20542	0.00777	0.00033	0.00080	0.06115	0.02460	0.04024	1.0000000
F94	Other Gases - Utah Share			0.29075	0.27675	0.08756	0.00381	0.20265	0.01027	0.00032	0.00079	0.06199	0.02507	0.04064	1.0000000
F95	Firm Wheeling - Utah Share			0.33194	0.28235	0.08300	0.00214	0.17940	0.00818	0.00027	0.00050	0.06701	0.02097	0.02424	1.0000000
F96	Non-Firm Wheeling - Utah Share			0.28768	0.27765	0.08679	0.00375	0.20142	0.01482	0.00031	0.00075	0.06047	0.02608	0.04028	1.0000000
F101	Rate Base			0.40570	0.26598	0.07588	0.00394	0.13429	0.00976	0.00032	0.00043	0.07022	0.01593	0.01755	1.0000000
F101P	Generation Rate Base			0.33681	0.27869	0.08244	0.00246	0.14283	0.00762	0.00029	0.00043	0.06932	0.02114	0.02671	1.0000000
F101T	Transmission Rate Base			0.33834	0.27954	0.08214	0.00204	0.18099	0.00874	0.00034	0.00043	0.06732	0.02108	0.02254	1.0000000
F101D	Distribution Rate Base			0.61007	0.22390	0.05700	0.00934	0.00021	0.01247	0.00050	0.00028	0.08620	0.00000	0.00000	1.0000000
F101R	Retail Rate Base			0.75526	0.47228	0.01933	0.01116	0.10789	0.01044	0.00094	0.016173	0.03332	0.03259	0.03259	1.0000000
F101M	Misc Rate Base			0.32815	0.26411	0.08392	0.00445	0.14283	0.00762	0.00029	0.00043	0.06932	0.02114	0.02671	1.0000000
F102	SGP - System Gross Plant			0.41044	0.26326	0.07504	0.00495	0.13139	0.00967	0.00034	0.00043	0.07246	0.01543	0.01659	1.0000000
F102P	SGGP - System Gross Generation Plant			0.33997	0.27918	0.08195	0.00207	0.17687	0.00880	0.00027	0.00048	0.06702	0.02089	0.02250	1.0000000
F102T	SGTP - System Gross Transmission Plant			0.33862	0.27807	0.08163	0.00207	0.18001	0.00976	0.00027	0.00048	0.06702	0.02094	0.02241	1.0000000
F102D	SGDP - System Gross Distribution Plant			0.60939	0.21963	0.05596	0.01304	0.00089	0.01214	0.00052	0.00029	0.08797	0.00008	0.00008	1.0000000
F102R	SGTP - System Gross Retail Plant			0.41044	0.26326	0.07504	0.00495	0.13139	0.00967	0.00034	0.00043	0.07246	0.01543	0.01659	1.0000000
F102M	SGDP - System Gross Misc Plant			0.41044	0.26326	0.07504	0.00495	0.13139	0.00967	0.00034	0.00043	0.07246	0.01543	0.01659	1.0000000
F103	SGP - System Gross Plant (Regulatory fees)			0.33333	-	-	-	0.33333	-	-	-	0.33333	-	-	1.0000000
F104	SNP - System Net Plant			0.40891	0.26406	0.07525	0.00394	0.13258	0.00973	0.00033	0.00043	0.07220	0.01558	0.01688	1.0000000
F104P	SNP - System Net Generation Plant			0.33890	0.27910	0.08208	0.00211	0.17747	0.00883	0.00027	0.00049	0.06688	0.02098	0.02289	1.0000000
F104T	SNP - System Net Transmission Plant			0.33862	0.27807	0.08163	0.00207	0.18001	0.00876	0.00027	0.00048	0.06675	0.02094	0.02241	1.0000000
F104D	SNP - System Net Distribution Plant			0.60891	0.22329	0.05682	0.00924	0.00070	0.01246	0.00051	0.00031	0.08763	0.00007	0.00007	1.0000000
F104R	SNP - System Net Retail Plant			0.40891	0.26406	0.07525	0.00394	0.13258	0.00973	0.00033	0.00043	0.07220	0.01558	0.01688	1.0000000
F104M	SNP - System Net Misc Plant			0.40891	0.26406	0.07525	0.00394	0.13258	0.00973	0.00033	0.00043	0.07220	0.01558	0.01688	1.0000000
F105	STP - System Prod & Trans Plant			0.33952	0.27881	0.08185	0.00207	0.17791	0.00879	0.00027	0.00048	0.06693	0.02091	0.02247	1.0000000
F105P	SGGP - System Gross Generation Plant			0.33997	0.27918	0.08195	0.00207	0.17687	0.00880	0.00027	0.00048	0.06702	0.02089	0.02250	1.0000000
F105T	SGTP - System Gross Transmission Plant			0.33862	0.27807	0.08163	0.00207	0.18001	0.00976	0.00027	0.00048	0.06702	0.02094	0.02241	1.0000000
F105D	SGDP - System Gross Distribution Plant			0.60901	0.21963	0.05596	0.01304	0.00089	0.01214	0.00052	0.00029	0.08797	0.00008	0.00008	1.0000000
F105R	SGTP - System Gross Retail Plant			0.40901	0.26326	0.07504	0.00495	0.13139	0.00967	0.00034	0.00043	0.07246	0.01543	0.01659	1.0000000
F105M	SGDP - System Gross Misc Plant			0.40901	0.26326	0.07504	0.00495	0.13139	0.00967	0.00034	0.00043	0.07246	0.01543	0.01659	1.0000000
F106	STP - System Transmission Plant			0.33862	0.27807	0.08163	0.00207	0.18001	0.00976	0.00027	0.00048	0.06702	0.02094	0.02241	1.0000000
F107	STP - System Trans & Dist Plant			0.47879	0.24781	0.06834	0.00774	0.08278	0.01051	0.00040	0.00038	0.07774	0.01014	0.01085	1.0000000
F107P	SGGP - System Gross Generation Plant			0.33997	0.27918	0.08195	0.00207	0.17687	0.00880	0.00027	0.00048	0.06702	0.02089	0.02250	1.0000000
F107T	SGTP - System Gross Transmission Plant			0.33862	0.27807	0.08163	0.00207	0.18001	0.00976	0.00027	0.00048	0.06702	0.02094	0.02241	1.0000000
F107D	SGDP - System Gross Distribution Plant			0.60939	0.21963	0.05596	0.01304	0.00089	0.01214	0.00052	0.00029	0.08797	0.00008	0.00008	1.0000000
F107R	SGTP - System Gross Retail Plant			0.60939											

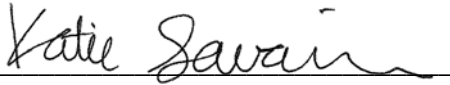
**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2018, a true and correct copy of the foregoing was served by electronic mail and overnight delivery to the following:

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