# Goss-Samford ${ }_{\text {utu }}$ <br>  

February 10, 2015

Mr. Jeff Derouen
HAND DELIVERED
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602
Re: PSC Case No. 2014-00252
Dear Mr. Derouen:
Please find enclosed for filing with the Commission in the above-referenced case, an original and ten copies of the response of East Kentucky Power Cooperative, Inc. to the Commission Staff's Hearing Request for Information from the formal hearing held on February 3, 2015.

Very truly yours,


Mark David Kos

Enclosures
Cc: Parties of Record

## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

## IN THE MATTER OF:

| AN APPLICATION OF EAST KENTUCKY |  |
| :--- | :--- |
| POWER COOPERATIVE, INC. FOR A |  |
| CERTIFICATE OF PUBLIC CONVENIENCE |  |
| AND NECESSITY FOR CONSTRUCTION OF AN |  |
| ASH LANDFILL AT J. K. SMITH STATION TO |  |
| RECEIVE IMPOUNDED ASH FROM WILLIAM | () |
| C. DALE STATION, AND FOR APPROVAL OF A | () |
| COMPLIANCE PLAN AMENDMENT FOR |  |
| ENVIRONMENTAL SURCHARGE RECOVERY |  |
| () |  |

## CERTIFICATE

## STATE OF KENTUCKY )

## COUNTY OF CLARK )

Isaac S. Scott, being duly sworn, states that he has supervised the preparation of the response of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff's Hearing Request for Information in the above-referenced case from the formal hearing held on February 3,2015 , and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.


Subscribed and sworn before me on this $\qquad$ day of February 2015.


# EAST KENTUCKY POWER COOPERATIVE, INC. 

PSC CASE NO. 2014-00252

## RESPONSE TO INFORMATION REQUEST

## COMMISSION'S INFORMATION REQUEST AT HEARING HELD ON 02/03/15

## REQUEST 1

## RESPONSIBLE PARTY:

Isaac S. Scott

Request 1. Provide a revenue requirements analysis of treating the $\$ 9,857,000$ in Ash Removal and Hauling costs as an expense rather than including in a Retirement Work in Progress account and amortizing the cost over a 10-year period.

Response 1. Please see pages 4 through 12 of 12 to this response for EKPC's analysis. The analysis is based on the modeling that EKPC used in its response to the Commission Staff's Initial Request for Information dated October 9, 2014, Request No. 30d(4), pages 13 through 22 of 35 .

The analysis is a comparison of revenue requirements. For EKPC's original proposal, the revenue requirement reflects the return on both the construction work in progress ("CWIP") balance for the Smith Landfill Cell and the retirement work in progress ("RWIP") balance for the total ash transfer costs plus the amortization expense for both these costs. For the alternative, the revenue requirement reflects the return on both the CWIP balance
for the Smith Landfill Cell and the RWIP balance for the total ash transfer costs (net of the ash removal and hauling costs), plus the amortization for those costs, plus the expensing of the ash removal and hauling costs as incurred. While the analysis reflects a 10 -year amortization period, because the proposed amortization of the CWIP and RWIP balances do not start at the same time, the analysis actually covers a period of 12 years and 9 months. The analysis presents the results on a monthly and annual basis.

As shown in the Summary on page 4 of 12, on an annual basis in the first three years of the analysis, the revenue requirement from expensing the ash removal and hauling costs would be $\$ 9,081,634$ higher than the revenue requirement for the same period under EKPC's original proposal. The ash removal and hauling costs are anticipated to be incurred between 2015 and 2017, so it would be expected that the revenue requirement resulting from expensing these costs would be higher than following RWIP accounting and accumulating and deferring the costs. From 2018 through 2027 the annual revenue requirement from expensing the ash removal and hauling costs would be $\$ 12,687,262$ lower than the revenue requirement for the same period under EKPC's original proposal. This result would also be expected, as no additional ash removal and hauling costs are anticipated after 2017. The analysis shows the net difference in the revenue requirement where the ash removal and hauling costs are expensed is $\$ 3,605,628$ lower than the EKPC original proposal over the 12 year and 9 month period.

EKPC believes this analysis demonstrates the point Mr. Scott was referencing during his testimony at the February 3,2015 public hearing. Looking at the

Summary page on a monthly basis shows that during the first three years of the project expensing the ash removal and hauling costs significantly increases the revenue requirement in eight months in each of those years. It is true that after the first three years the monthly revenue requirements are lower when the ash removal and hauling costs are expensed rather than accounted for under RWIP accounting.

EKPC also believes that this analysis shows that ratepayers would not be better off from expensing the ash removal and hauling costs for many years. Looking at the cumulative revenue requirements, either annually or monthly, shows that the cumulative revenue requirements from expensing the ash removal and hauling costs would be greater than the cumulative revenue requirements from the RWIP accounting treatment until 2024 , specifically August 2024. In other words, while the total difference in the cumulative revenue requirements over the 12 year and 9 month period is lower from expensing the ash removal and hauling costs, this advantage is not achieved until approximately 9 years and 4 months have passed. The advantage exists only during the last 3 years and 5 months of the analysis.

Summary Results - Comparison of Combined Return and Expense Totals
EKPC Original Proposal versus Expensing of Ash Removal and HautIng Costs

|  | Combined Return and Expense Totals |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  | EKPC | Expensing |  |  |
| Time Period | Original | Ash Removal \& | Dollar | Percentage |
|  | Proposal | Hauling Costs | Difference | Difference |


| Cumulative Totals |  |  |
| :---: | :---: | :---: |
| EKPC | Expensing |  |
| Original | Ash Removal \& | Dollar |
| Proposal | Hauling Costs | Difference |


| Calendar Year |  |  |  |  |
| :---: | ---: | ---: | ---: | ---: |
| 2015 | $\$ 278,377$ | $\$ 1,369,908$ | $\$ 1,091,531$ | $392.11 \%$ |
| 2016 | $\$ 1,116,402$ | $\$ 5,601,361$ | $\$ 4,484,959$ | $401.73 \%$ |
| 2017 | $\$ 1,883,699$ | $\$ 5,388,843$ | $\$ 3,505,144$ | $186.08 \%$ |
| 2018 | $\$ 4,177,475$ | $\$ 2,631,770$ | $(\$ 1,545,705)$ | $-37.00 \%$ |
| 2019 | $\$ 4,014,084$ | $\$ 2,528,114$ | $(\$ 1,485,970)$ | $-37.02 \%$ |
| 2020 | $\$ 3,850,696$ | $\$ 2,424,458$ | $(\$ 1,426,238)$ | $-37.04 \%$ |
| 2021 | $\$ 3,687,305$ | $\$ 2,320,802$ | $(\$ 1,366,503)$ | $-37.06 \%$ |
| 2022 | $\$ 3,523,916$ | $\$ 2,217,146$ | $(\$ 1,306,770)$ | $-37.08 \%$ |
| 2023 | $\$ 3,360,526$ | $\$ 2,113,490$ | $(\$ 1,247,036)$ | $-37.11 \%$ |
| 2024 | $\$ 3,197,140$ | $\$ 2,009,838$ | $(\$ 1,187,302)$ | $-37.14 \%$ |
| 2025 | $\$ 2,967,629$ | $\$ 1,840,060$ | $(\$ 1,127,569)$ | $-38.00 \%$ |
| 2026 | $\$ 2,487,530$ | $\$ 1,419,696$ | $(\$ 1,067,834)$ | $-42.93 \%$ |
| 2027 | $\$ 2,157,998$ | $\$ 1,231,663$ | $(\$ 926,335)$ | $-42.93 \%$ |
|  | $\$ 36,702,777$ | $\$ 33,097,149$ | $(\$ 3,605,628)$ | $-9.82 \%$ |
| Totals |  |  |  | -20 |

Monthly

| April 2015 | \$7,314 | \$146,944 | \$139,630 | 1909.08\% | \$7,314 | \$146,944 | \$139,630 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| May | \$11,496 | \$150,418 | \$138,922 | 1208.44\% | \$18,810 | \$297,362 | \$278,552 |
| June | \$15,679 | \$153,892 | \$138,213 | 881.52\% | \$34,489 | \$451,254 | \$416,765 |
| July | \$19,862 | \$157,366 | \$137,504 | 692.30\% | \$54,351 | \$608,620 | \$554,269 |
| August | \$24,044 | \$160,840 | \$136,796 | 568.94\% | \$78,395 | \$769,460 | \$691,065 |
| September | \$28,227 | \$164,314 | \$136,087 | 482.12\% | \$106,622 | \$933,774 | \$827,152 |
| October | \$32,410 | \$167,788 | \$135,378 | 417.70\% | \$139,032 | \$1,101,562 | \$962,530 |
| November | \$69,757 | \$204,427 | \$134,670 | 193.06\% | \$208,789 | \$1,305,989 | \$1,097,200 |
| December 2015 | \$69,588 | \$63,919 | $(\$ 5,669)$ | -8.15\% | \$278,377 | \$1,369,908 | \$1,091,531 |
| January 2016 | \$69,420 | \$63,751 | $(\$ 5,669)$ | -8.17\% | \$347,797 | \$1,433,659 | \$1,085,862 |
| February | \$69,252 | \$63,583 | $(\$ 5,669)$ | -8.19\% | \$417,049 | \$1,497,242 | \$1,080,193 |
| March | \$69,083 | \$63,414 | $(\$ 5,669)$ | -8.21\% | \$486,132 | \$1,560,656 | \$1,074,524 |
| April | \$75,608 | \$652,365 | \$576,757 | 762.83\% | \$561,740 | \$2,213,021 | \$1,651,281 |
| May | \$82,132 | \$655,933 | \$573,801 | 698.63\% | \$643,872 | \$2,868,954 | \$2,225,082 |
| June | \$88,656 | \$659,501 | \$570,845 | 643.89\% | \$732,528 | \$3,528,455 | \$2,795,927 |
| July | \$95,180 | \$663,069 | \$567,889 | 596.65\% | \$827,708 | \$4,191,524 | \$3,363,816 |
| August | \$101,705 | \$666,637 | \$564,932 | 555.46\% | \$929,413 | \$4,858,161 | \$3,928,748 |
| September | \$108,228 | \$670,205 | \$561,977 | 519.25\% | \$1,037,641 | \$5,528,366 | \$4,490,725 |
| October | \$114,753 | \$673,773 | \$559,020 | 487.15\% | \$1,152,394 | \$6,202,139 | \$5,049,745 |
| November | \$121,277 | \$677,341 | \$556,064 | 458.51\% | \$1,273,671 | \$6,879,480 | \$5,605,809 |
| December 2016 | \$121,108 | \$91,789 | $(\$ 29,319)$ | -24.21\% | \$1,394,779 | \$6,971,269 | \$5,576,490 |
| January 2017 | \$120,940 | \$91,621 | $(\$ 29,319)$ | -24.24\% | \$1,515,719 | \$7,062,890 | \$5,547,171 |
| February | \$120,772 | \$91,453 | $(\$ 29,319)$ | -24.28\% | \$1,636,491 | \$7,154,343 | \$5,517,852 |
| March | \$120,603 | \$91,284 | $(\$ 29,319)$ | -24.31\% | \$1,757,094 | \$7,245,627 | \$5,488,533 |
| April | \$126,189 | \$600,715 | \$474,526 | 376.04\% | \$1,883,283 | \$7,846,342 | \$5,963,059 |
| May | \$131,774 | \$603,743 | \$471,969 | 358.17\% | \$2,015,057 | \$8,450,085 | \$6,435,028 |
| June | \$137,358 | \$606,770 | \$469,412 | 341.74\% | \$2,152,415 | \$9,056,855 | \$6,904,440 |
| July | \$142,943 | \$609,798 | \$466,855 | 326.60\% | \$2,295,358 | \$9,666,653 | \$7,371,295 |
| August | \$148,528 | \$612,826 | \$464,298 | 312.60\% | \$2,443,886 | \$10,279,479 | \$7,835,593 |
| September | \$154,113 | \$615,852 | \$461,739 | 299.61\% | \$2,597,999 | \$10,895,331 | \$8,297,332 |
| October | \$159,698 | \$618,880 | \$459,182 | 287.53\% | \$2,757,697 | \$11,514,211 | \$8,756,514 |
| November | \$165,283 | \$621,908 | \$456,625 | 276.27\% | \$2,922,980 | \$12,136,119 | \$9,213,139 |
| December 2017 | \$355,498 | \$223,993 | $(\$ 131,505)$ | -36.99\% | \$3,278,478 | \$12,360,112 | \$9,081,634 |
| January 2018 | \$354,363 | \$223,273 | $(\$ 131,090)$ | -36.99\% | \$3,632,841 | \$12,583,385 | \$8,950,544 |
| February | \$353,229 | \$222,554 | (\$130,675) | -36.99\% | \$3,986,070 | \$12,805,939 | \$8,819,869 |
| March | \$352,094 | \$221,833 | (\$130,261) | -37.00\% | \$4,338,164 | \$13,027,772 | \$8,689,608 |
| April | \$350,960 | \$221,114 | (\$129,846) | -37.00\% | \$4,689,124 | \$13,248,886 | \$8,559,762 |
| May | \$349,825 | \$220,394 | (\$129,431) | -37.00\% | \$5,038,949 | \$13,469,280 | \$8,430,331 |
| June | \$348,690 | \$219,674 | $(\$ 129,016)$ | -37.00\% | \$5,387,639 | \$13,688,954 | \$8,301,315 |
| July | \$347,556 | \$218,954 | $(\$ 128,602)$ | -37.00\% | \$5,735,195 | \$13,907,908 | \$8,172,713 |
| August | \$346,421 | \$218,235 | $(\$ 128,186)$ | -37.00\% | \$6,081,616 | \$14,126,143 | \$8,044,527 |
| September | \$345,286 | \$217,514 | (\$127,772) | -37.00\% | \$6,426,902 | \$14,343,657 | \$7,916,755 |
| October | \$344,152 | \$216,795 | (\$127,357) | -37.01\% | \$6,771,054 | \$14,560,452 | \$7,789,398 |
| November | \$343,017 | \$216,075 | (\$126,942) | -37.01\% | \$7,114,071 | \$14,776,527 | \$7,662,456 |
| December 2018 | \$341,882 | \$215,355 | $(\$ 126,527)$ | -37.01\% | \$7,455,953 | \$14,991,882 | \$7,535,929 |
| January 2019 | \$340,748 | \$214,635 | $(\$ 126,113)$ | -37.01\% | \$7,796,701 | \$15,206,517 | \$7,409,816 |
| February | \$339,613 | \$213,916 | (\$125,697) | -37.01\% | \$8,136,314 | \$15,420,433 | \$7,284,119 |
| March | \$338,478 | \$213,195 | (\$125,283) | -37.01\% | \$8,474,792 | \$15,633,628 | \$7,158,836 |
| April | \$337,344 | \$212,476 | (\$124,868) | -37.02\% | \$8,812,136 | \$15,846,104 | \$7,033,968 |
| May | \$336,209 | \$211,756 | (\$124,453) | -37.02\% | \$9,148,345 | \$16,057,860 | \$6,909,515 |
| June | \$335,074 | \$211,036 | (\$124,038) | -37.02\% | \$9,483,419 | \$16,268,896 | \$6,785,477 |
| July | \$333,940 | \$210,316 | $(\$ 123,624)$ | -37.02\% | \$9,817,359 | \$16,479,212 | \$6,661,853 |

Summary Results - Comparison of Combined Return and Expense Totals EKPC Original Proposal versus Expensing of Ash Removal and Hauling Costs

|  | Combined Return and Expense Totals |  |  |  | Cumulative Totals |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Time Period | EKPC <br> Original <br> Proposal | Expensing Ash Removal \& Hauling Costs | Dollar Difference | Percentage Difference | EKPC Original Proposal | Expensing Ash Removal \& Hauling Costs | Dollar Difference |
| August | \$332,805 | \$209,597 | $(\$ 123,208)$ | -37.02\% | \$10,150,164 | \$16,688,809 | \$6,538,645 |
| September | \$331,670 | \$208,876 | (\$122,794) | -37.02\% | \$10,481,834 | \$16,897,685 | \$6,415,851 |
| October | \$330,536 | \$208,157 | $(\$ 122,379)$ | -37.02\% | \$10,812,370 | \$17,105,842 | \$6,293,472 |
| November | \$329,401 | \$207,437 | (\$121,964) | -37.03\% | \$11,141,771 | \$17,313,279 | \$6,171,508 |
| December 2019 | \$328,266 | \$206,717 | (\$121,549) | -37.03\% | \$11,470,037 | \$17,519,996 | \$6,049,959 |
| January 2020 | \$327,132 | \$205,997 | (\$121,135) | -37.03\% | \$11,797,169 | \$17,725,993 | \$5,928,824 |
| February | \$325,998 | \$205,278 | (\$120,720) | -37.03\% | \$12,123,167 | \$17,931,271 | \$5,808,104 |
| March | \$324,862 | \$204,557 | (\$120,305) | -37.03\% | \$12,448,029 | \$18,135,828 | \$5,687,799 |
| April | \$323,728 | \$203,838 | (\$119,890) | -37.03\% | \$12,771,757 | \$18,339,666 | \$5,567,909 |
| May | \$322,594 | \$203,118 | (\$119,476) | -37.04\% | \$13,094,351 | \$18,542,784 | \$5,448,433 |
| June | \$321,458 | \$202,398 | (\$119,060) | -37.04\% | \$13,415,809 | \$18,745,182 | \$5,329,373 |
| July | \$320,324 | \$201,678 | $(\$ 118,646)$ | -37.04\% | \$13,736,133 | \$18,946,860 | \$5,210,727 |
| August | \$319,190 | \$200,959 | $(\$ 118,231)$ | -37.04\% | \$14,055,323 | \$19,147,819 | \$5,092,496 |
| September | \$318,054 | \$200,238 | $(\$ 117,816)$ | -37.04\% | \$14,373,377 | \$19,348,057 | \$4,974,680 |
| October | \$316,920 | \$199,519 | (\$117,401) | -37.04\% | \$14,690,297 | \$19,547,576 | \$4,857,279 |
| November | \$315,786 | \$198,799 | $(\$ 116,987)$ | -37.05\% | \$15,006,083 | \$19,746,375 | \$4,740,292 |
| December 2020 | \$314,650 | \$198,079 | (\$116,571) | -37.05\% | \$15,320,733 | \$19,944,454 | \$4,623,721 |
| January 2021 | \$313,516 | \$197,359 | $(\$ 116,157)$ | -37.05\% | \$15,634,249 | \$20,141,813 | \$4,507,564 |
| February | \$312,382 | \$196,640 | (\$115,742) | -37.05\% | \$15,946,631 | \$20,338,453 | \$4,391,822 |
| March | \$311,246 | \$195,919 | (\$115,327) | -37.05\% | \$16,257,877 | \$20,534,372 | \$4,276,495 |
| April | \$310,112 | \$195,200 | (\$114,912) | -37.05\% | \$16,567,989 | \$20,729,572 | \$4,161,583 |
| May | \$308,978 | \$194,480 | (\$114,498) | -37.06\% | \$16,876,967 | \$20,924,052 | \$4,047,085 |
| June | \$307,842 | \$193,760 | (\$114,082) | -37.06\% | \$17,184,809 | \$21,117,812 | \$3,933,003 |
| July | \$306,708 | \$193,040 | $(\$ 113,668)$ | -37.06\% | \$17,491,517 | \$21,310,852 | \$3,819,335 |
| August | \$305,574 | \$192,321 | $(\$ 113,253)$ | -37.06\% | \$17,797,091 | \$21,503,173 | \$3,706,082 |
| September | \$304,438 | \$191,600 | (\$112,838) | -37.06\% | \$18,101,529 | \$21,694,773 | \$3,593,244 |
| October | \$303,304 | \$190,881 | (\$112,423) | -37.07\% | \$18,404,833 | \$21,885,654 | \$3,480,821 |
| November | \$302,170 | \$190,161 | (\$112,009) | -37.07\% | \$18,707,003 | \$22,075,815 | \$3,368,812 |
| December 2021 | \$301,035 | \$189,441 | (\$111.594) | -37.07\% | \$19,008,038 | \$22,265,256 | \$3,257,218 |
| January 2022 | \$299,900 | \$188,721 | (\$111, 179) | -37.07\% | \$19,307,938 | \$22,453,977 | \$3,146,039 |
| February | \$298,766 | \$188,002 | (\$110,764) | -37.07\% | \$19,606,704 | \$22,641,979 | \$3,035,275 |
| March | \$297,631 | \$187,281 | $(\$ 110,350)$ | -37.08\% | \$19,904,335 | \$22,829,260 | \$2,924,925 |
| April | \$296,496 | \$186,562 | (\$109,934) | -37.08\% | \$20,200,831 | \$23,015,822 | \$2,814,991 |
| May | \$295,362 | \$185,842 | (\$109,520) | -37.08\% | \$20,496,193 | \$23,201,664 | \$2,705,471 |
| June | \$294,227 | \$185,122 | $(\$ 109,105)$ | -37.08\% | \$20,790,420 | \$23,386,786 | \$2,596,366 |
| July | \$293,092 | \$184,402 | ( $\$ 108,690$ ) | -37.08\% | \$21,083,512 | \$23,571,188 | \$2,487,676 |
| August | \$291,958 | \$183,683 | (\$108,275) | -37.09\% | \$21,375,470 | \$23,754,871 | \$2,379,401 |
| September | \$290,823 | \$182,962 | (\$107,861) | -37.09\% | \$21,666,293 | \$23,937,833 | \$2,271,540 |
| October | \$289,688 | \$182,243 | $(\$ 107,445)$ | -37.09\% | \$21,955,981 | \$24,120,076 | \$2,164,095 |
| November | \$288,554 | \$181,523 | (\$107,031) | -37.09\% | \$22,244,535 | \$24,301,599 | \$2,057,064 |
| December 2022 | \$287,419 | \$180,803 | $(\$ 106,616)$ | -37.09\% | \$22,531,954 | \$24,482,402 | \$1,950,448 |
| January 2023 | \$286,284 | \$180,083 | (\$106,201) | -37.10\% | \$22,818,238 | \$24,662,485 | \$1,844,247 |
| February | \$285,150 | \$179,364 | $(\$ 105,786)$ | -37.10\% | \$23,103,388 | \$24,841,849 | \$1,738,461 |
| March | \$284,015 | \$178,643 | (\$105,372) | -37.10\% | \$23,387,403 | \$25,020,492 | \$1,633,089 |
| April | \$282,880 | \$177,924 | (\$104,956) | -37.10\% | \$23,670,283 | \$25,198,416 | \$1,528,133 |
| May | \$281,746 | \$177,204 | (\$104,542) | -37.11\% | \$23,952,029 | \$25,375,620 | \$1,423,591 |
| June | \$280,611 | \$176,484 | (\$104,127) | -37.11\% | \$24,232,640 | \$25,552,104 | \$1,319,464 |
| July | \$279,477 | \$175,764 | (\$103,713) | -37.11\% | \$24,512,117 | \$25,727,868 | \$1,215,751 |
| August | \$278,342 | \$175,045 | (\$103,297) | -37.11\% | \$24,790,459 | \$25,902,913 | \$1,112,454 |
| September | \$277,207 | \$174,324 | $(\$ 102,883)$ | -37.11\% | \$25,067,666 | \$26,077,237 | \$1,009,571 |
| October | \$276,073 | \$173,605 | $(\$ 102,468)$ | -37.12\% | \$25,343,739 | \$26,250,842 | \$907,103 |
| November | \$274,938 | \$172,885 | $(\$ 102,053)$ | -37.12\% | \$25,618,677 | \$26,423,727 | \$805,050 |
| December 2023 | \$273,803 | \$172,165 | (\$101,638) | -37.12\% | \$25,892,480 | \$26,595,892 | \$703,412 |
| January 2024 | \$272,669 | \$171,445 | (\$101,224) | -37.12\% | \$26,165,149 | \$26,767,337 | \$602,188 |
| February | \$271,534 | \$170,726 | (\$100,808) | -37.13\% | \$26,436,683 | \$26,938,063 | \$501,380 |
| March | \$270,400 | \$170,006 | (\$100,394) | -37.13\% | \$26,707,083 | \$27,108,069 | \$400,986 |
| April | \$269,265 | \$169,286 | (\$99,979) | -37.13\% | \$26,976,348 | \$27,277,355 | \$301,007 |
| May | \$268,130 | \$168,566 | $(\$ 99,564)$ | -37.13\% | \$27,244,478 | \$27,445,921 | \$201,443 |
| June | \$266,996 | \$167,847 | $(\$ 99,149)$ | -37.14\% | \$27,511,474 | \$27,613,768 | \$102,294 |
| July | \$265,861 | \$167,126 | $(\$ 98,735)$ | -37.14\% | \$27,777,335 | \$27,780,894 | \$3,559 |
| August | \$264,726 | \$166,407 | $(\$ 98,319)$ | -37.14\% | \$28,042,061 | \$27,947,301 | (\$94,760) |
| September | \$263,592 | \$165,687 | $(\$ 97,905)$ | -37.14\% | \$28,305,653 | \$28,112,988 | $(\$ 192,665)$ |
| October | \$262,457 | \$164,967 | $(\$ 97,490)$ | -37.15\% | \$28,568,110 | \$28,277,955 | $(\$ 290,155)$ |
| November | \$261,322 | \$164,247 | (\$97,075) | -37.15\% | \$28,829,432 | \$28,442,202 | ( $\$ 387,230$ ) |
| December 2024 | \$260,188 | \$163,528 | $(\$ 96,660)$ | -37.15\% | \$29,089,620 | \$28,605,730 | (\$483,890) |
| January 2025 | \$259,053 | \$162,807 | $(\$ 96,246)$ | -37.15\% | \$29,348,673 | \$28,768,537 | $(\$ 580,136)$ |
| February | \$257,918 | \$162,088 | $(\$ 95,830)$ | -37.16\% | \$29,606,591 | \$28,930,625 | $(\$ 675,966)$ |
| March | \$256,784 | \$161,368 | $(\$ 95,416)$ | -37.16\% | \$29,863,375 | \$29,091,993 | $(\$ 771,382)$ |
| April | \$255,649 | \$160,648 | $(\$ 95,001)$ | -37.16\% | \$30,119,024 | \$29,252,641 | $(\$ 866,383)$ |
| May | \$254,515 | \$159,928 | $(\$ 94,587)$ | -37.16\% | \$30,373,539 | \$29,412,569 | (\$960,970) |
| June | \$253,380 | \$159,209 | $(\$ 94,171)$ | -37.17\% | \$30,626,919 | \$29,571,778 | (\$1,055,141) |
| July | \$252,245 | \$158,488 | $(\$ 93,757)$ | -37.17\% | \$30,879,164 | \$29,730,266 | (\$1,148,898) |

Summary Results - Comparison of Combined Return and Expense Totals EKPC Original Proposal versus Expensing of Ash Removal and Hauling Costs

| Time Period | Combined Return and Expense Totals |  |  |  | Cumulative Totals |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | EKPC <br> Original <br> Proposal | Expensing Ash Removal \& Hauling Costs | Dollar Difference | Percentage Difference | EKPC Original Proposal | Expensing Ash Removal \& Hauling Costs | Dollar Difference |
| August | \$251,111 | \$157,769 | $(\$ 93,342)$ | -37.17\% | \$31,130,275 | \$29,888,035 | (\$1,242,240) |
| September | \$249,976 | \$157,049 | $(\$ 92,927)$ | -37.17\% | \$31,380,251 | \$30,045,084 | (\$1,335,167) |
| October | \$248,841 | \$156,329 | $(\$ 92,512)$ | -37.18\% | \$31,629,092 | \$30,201,413 | (\$1,427,679) |
| November | \$214,582 | \$122,484 | $(\$ 92,098)$ | -42.92\% | \$31,843,674 | \$30,323,897 | (\$1,519,777) |
| December 2025 | \$213,575 | \$121,893 | $(\$ 91,682)$ | -42.93\% | \$32,057,249 | \$30,445,790 | (\$1,611,459) |
| January 2026 | \$212,609 | \$121,341 | (\$91,268) | -42.93\% | \$32,269,858 | \$30,567,131 | (\$1,702,727) |
| February | \$211,643 | \$120,790 | $(\$ 90,853)$ | -42.93\% | \$32,481,501 | \$30,687,921 | (\$1,793,580) |
| March | \$210,676 | \$120,238 | $(\$ 90,438)$ | -42.93\% | \$32,692,177 | \$30,808,159 | (\$1,884,018) |
| April | \$209,710 | \$119,687 | $(\$ 90,023)$ | -42.93\% | \$32,901,887 | \$30,927,846 | ( $\$ 1,974,041$ ) |
| May | \$208,744 | \$119,135 | $(\$ 89,609)$ | -42.93\% | \$33,110,631 | \$31,046,981 | (\$2,063,650) |
| June | \$207,777 | \$118,584 | $(\$ 89,193)$ | -42.93\% | \$33,318,408 | \$31,165,565 | $(\$ 2,152,843)$ |
| July | \$206,811 | \$118,032 | $(\$ 88,779)$ | -42.93\% | \$33,525,219 | \$31,283,597 | ( $\$ 2,241,622$ ) |
| August | \$205,845 | \$117,481 | $(\$ 88,364)$ | -42.93\% | \$33,731,064 | \$31,401,078 | (\$2,329,986) |
| September | \$204,878 | \$116,929 | $(\$ 87,949)$ | -42.93\% | \$33,935,942 | \$31,518,007 | ( $\$ 2,417,935$ ) |
| October | \$203,912 | \$116,378 | $(\$ 87,534)$ | -42.93\% | \$34,139,854 | \$31,634,385 | ( $\$ 2,505,469$ ) |
| November | \$202,946 | \$115,826 | $(\$ 87,120)$ | -42.93\% | \$34,342,800 | \$31,750,211 | $(\$ 2,592,589)$ |
| December 2026 | \$201,979 | \$115,275 | $(\$ 86,704)$ | -42.93\% | \$34,544,779 | \$31,865,486 | (\$2,679,293) |
| January 2027 | \$201,013 | \$114,723 | $(\$ 86,290)$ | -42.93\% | \$34,745,792 | \$31,980,209 | (\$2,765,583) |
| February | \$200,047 | \$114,172 | $(\$ 85,875)$ | -42.93\% | \$34,945,839 | \$32,094,381 | (\$2,851,458) |
| March | \$199,081 | \$113,620 | (\$85,461) | -42.93\% | \$35,144,920 | \$32,208,001 | (\$2,936,919) |
| April | \$198,114 | \$113,069 | $(\$ 85,045)$ | -42.93\% | \$35,343,034 | \$32,321,070 | (\$3,021,964) |
| May | \$197,148 | \$112,517 | (\$84,631) | -42.93\% | \$35,540,182 | \$32,433,587 | (\$3,106,595) |
| June | \$196,182 | \$111,966 | $(\$ 84,216)$ | -42.93\% | \$35,736,364 | \$32,545,553 | (\$3,190,811) |
| July | \$195,215 | \$111,414 | $(\$ 83,801)$ | -42.93\% | \$35,931,579 | \$32,656,967 | (\$3,274,612) |
| August | \$194,249 | \$110,863 | $(\$ 83,386)$ | -42.93\% | \$36,125,828 | \$32,767,830 | (\$3,357,998) |
| September | \$193,283 | \$110,311 | $(\$ 82,972)$ | -42.93\% | \$36,319,111 | \$32,878,141 | (\$3,440,970) |
|  | \$192,316 | \$109,760 | $(\$ 82,556)$ | -42.93\% | \$36,511,427 | \$32,987,901 | $(\$ 3,523,526)$ |
| November | \$191,350 | \$109,208 | $(\$ 82,142)$ | -42.93\% | \$38,702,777 | \$33,097,109 | $(\$ 3,605,668)$ |
| December 2027 | \$0 | \$40 | \$40 | 0.00\% | \$36,702,777 | \$33,097,149 | $(\$ 3,605,628)$ |
| Totals | \$36,702,777 | \$33,097,149 | (\$3,605,628) | -9.82\% |  |  |  |


































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