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Via Overnight Mail

June 29, 2011

RECEIVED

JUN 30 2011

**PUBLIC SERVICE
COMMISSION**

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: Case No. 2011-00036

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC's ("KIUC") MOTION TO DEVIATE FROM RULE GOVERNING FILING OF COPIES to be filed in the above-referenced matter.

Pursuant to the KIUC's Motion to Deviate, I also enclose eleven paper copies and 11 sets of the 4 CD's of the previously filed public version of KIUC's Data Responses and Exhibits to Commission Staffs Initial Information Requests and Big Rivers Electric Corporation First Data Requests.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place these documents of file.

Very Truly Yours,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

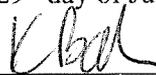
BOEHM, KURTZ & LOWRY

MLKkew
Attachment

cc: Certificate of Service
David C. Brown, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic mail (when available) or by mailing a true and correct copy by overnight mail, unless other noted, this 29th day of June, 2011 to the following



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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST
PSC CASE NO. 2011-00036
June 22, 2011

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PUBLIC SERVICE
COMMISSION

Request STAFF-1

Refer to page 9, line 1-5, of the Direct Testimony and Exhibits of Henry W. Fayne ("Fayne Testimony"). Mr. Fayne states that there were 34 smelters in the U.S. in 1978 producing 31 percent of the world supply of aluminum. Today, there are ten smelters producing only 4.2 percent of the world's supply.

- a. Explain where the production has moved and whether the price of electricity is the only reason smelters have left the U.S.
- b. Considering the estimated cost impacts of the new and amended federal environmental regulations, explain whether Mr. Fayne believes that the aluminum industry in the United States can survive the impact if complying with the new regulations.

RESPONSE

- a. In all cases, the smelters that shut down in the U.S. identified the cost of electricity as the primary reason for the closure. New production capacity has developed in places around the world with either low-cost hydro or geo-thermal sources of electricity or where government subsidies had been provided (e.g., Iceland, Middle East).
- b. Considering the estimated cost impacts of the new and amended federal environmental regulations, Mr. Fayne believes that smelters supplied with electricity primarily from hydroelectric sources should continue to be viable. Smelters such as Sebree and Hawesville that are supplied with electricity primarily from coal sources are less likely to survive unless (1) the rest of the world adopts similar provisions which would adjust the LME to levels that would support such higher electricity costs or (2) special arrangements are implemented which would mitigate such costs for the smelters.

Witness: Henry W Fayne

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST
PSC CASE NO. 2011-00036
June 22, 2011

Request STAFF-2

Refer to page 9, line 18, of the Fayne Testimony and Exhibit HWF-1. Both refer to the average global price of electricity for smelters, excluding China, of approximately \$27 per MWh. Explain why the "global price" does not include the price of electricity for smelters operating in China. If the price in China is available, provide it.

RESPONSE

The price of electricity for smelters in China is generally excluded from analyses intended to evaluate the competitive viability of smelters for the following reasons:

1. The high cost of electricity in China is offset by government subsidized labor and plant investment.
2. China is not an open market economy. Aluminum production in China is consumed internally (independent of price) and, therefore, the cost of production in China does not directly affect the LME price.

The cost of electricity in China is approximately \$58/MWh.

Witness: Henry W Fayne

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST
PSC CASE NO. 2011-00036
June 22, 2011

Request STAFF-3

Refer to pages 18-19 of the Fayne Testimony. Provide copies of the following commission orders referenced by Mr. Fayne, which included decisions that specifically addressed cost-of-service issues for aluminum smelters:

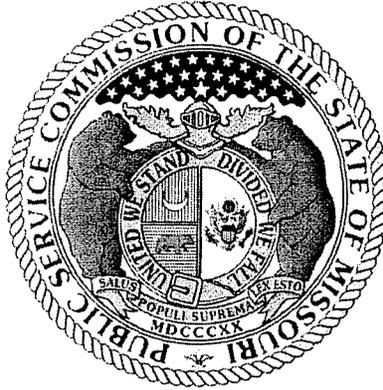
- a. Missouri commission – Case No. ER-2010-0036
- b. Ohio commission – Case No. 09-119-EI-AEC
- c. West Virginia – Case No. 05-278-E-PC-PW-42T

RESPONSE

Please see attached Exhibits STAFF-3A, STAFF-3B, and STAFF-3C on enclosed CD.

Witness: Henry W Fayne

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**



In the Matter of Union Electric Company, d/b/a)
AmerenUE's Tariffs to Increase Its Annual)
Revenues for Electric Service)

File No. ER-2010-0036
Tariff No. YE-2010-0054

REPORT AND ORDER

Issue Date: May 28, 2010

Effective Date: June 7, 2010

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company, d/b/a)	File No. ER-2010-0036
AmerenUE's Tariffs to Increase Its Annual)	Tariff No. YE-2010-0054
Revenues for Electric Service)	

APPEARANCES

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For the Staff of the Missouri Public Service Commission.

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For the Office of the Public Counsel and the Public.

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For the Missouri Department of Natural Resources.

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For the Midwest Energy Users' Association.

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For Laclede Gas Company.

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For Missouri Energy Group.

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For AARP and the Consumers Council of Missouri.

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For International Brotherhood of Electrical Workers Locals 2, 309, 649, 702, 1439, 1455, AFL-CIO and International Brotherhood of Operating Engineers Local 148, AFL-CIO.

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For Charter Communications, Inc..

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For the City of O'Fallon, the City of University City, the City of Rock Hill, and the St. Louis County Municipal Group (The Municipal Group).

Douglas L. Healy, Attorney at Law, Healy & Healy, LLC, 939 Boonville, Suite A, Springfield, Missouri 65802.

For the Missouri Joint Municipal Electric Utility Commission

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Jefferson City, Missouri 65101.

For the Missouri Retailers Association.

CHIEF REGULATORY LAW JUDGE: Morris L. Woodruff

REPORT AND ORDER

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The Missouri Public Service Commission, having considered all the competent and substantial evidence upon the whole record, makes the following findings of fact and conclusions of law. The positions and arguments of all of the parties have been considered by the Commission in making this decision. Failure to specifically address a piece of evidence, position, or argument of any party does not indicate that the Commission has failed to consider relevant evidence, but indicates rather that the omitted material was not dispositive of this decision.

Summary

This order allows AmerenUE to increase the revenue it may collect from its Missouri customers by approximately \$226.3 million based on the data contained in the Revised True-up Reconciliation filed by the Missouri Public Service Commission Staff on April 14, 2010.

Procedural History

On July 24, 2009, Union Electric Company, d/b/a AmerenUE filed tariff sheets designed to implement a general rate increase for electric service. The tariff would have increased AmerenUE's annual electric revenues by approximately \$401.5 million. The tariff revisions carried an effective date of August 23, 2009. By a separate tariff also issued on July 24, AmerenUE sought to implement an interim rate adjustment that would have allowed it to recover \$37.3 million as an interim rate increase. The interim rate adjustment tariff carried an October 1, 2009 effective date.

By order issued on July 27, 2009, the Commission suspended AmerenUE's general rate increase tariff until June 21, 2010, the maximum amount of time allowed by the controlling statute.¹ In the same order, the Commission directed that notice of AmerenUE's tariff filing be provided to interested parties and the public. The Commission also established August 17, 2009, as the deadline for submission of applications to intervene. The following parties filed applications and were allowed to intervene: The International Brotherhood of Electrical Workers Locals 2, 309, 649, 702, 1439, and 1455, AFL-CIO and International Union of Operating Engineers Local 148 AFL-CIO (collectively the Unions); The Missouri Industrial Energy Consumers (MIEC);² The Missouri Energy Group (MEG);³ The Missouri Department of Natural Resources; Laclede Gas Company; The Consumers Council of Missouri; AARP; The Missouri Retailers Association; The Natural Resources

¹ Section 393.150, RSMo 2000.

² The following members of MIEC were allowed to intervene as individual entities and as an association: Anheuser-Busch Companies, Inc.; BioKyowa, Inc.; The Boeing Company; Doe Run; Enbridge; General Motors Corporation; GKN Aerospace; Hussmann Corporation; JW Aluminum; MEMC Electronic Materials; Monsanto; Pfizer; Precoat Metals; Proctor & Gamble Company; Nestlé Purina PetCare; Noranda Aluminum; Saint Gobain; Solutia; and U.S. Silica Company.

³ The members of MEG are Barnes–Jewish Hospital; Buzzi Unicem USA, Inc.; and SSM HealthCare.

Defense Council; the Missouri Association of Community Organizations for Reform Now (MO-ACORN); the City of O'Fallon, the City of University City, the City of Rock Hill, and the St. Louis County Municipal League (the Municipal Group); the Midwest Energy Users' Association (MEUA);⁴ Charter Communications, Inc.; the Missouri Joint Municipal Electric Utility Commission; and Kansas City Power & Light Company.

On September 14, 2009, the Commission established the test year for this case as the 12-month period ending March 31, 2009, trued-up as of January 31, 2010. In its September 14 order, the Commission established a procedural schedule leading to an evidentiary hearing regarding AmerenUE's general rate increase tariff.

The Commission addressed AmerenUE's interim rate increase tariff separately. The Commission suspended that tariff from its October 1, 2009 effective date until January 29, 2010. After accepting prefiled testimony and conducting an evidentiary hearing on December 7, 2009, the Commission rejected the interim rate increase tariff in a Report and Order issued on January 13, 2010.

In January and February, 2010, the Commission conducted seventeen local public hearings at various sites around AmerenUE's service area. At those hearings, the Commission heard comments from AmerenUE's customers and the public regarding AmerenUE's request for a rate increase.

In compliance with the established procedural schedule, the parties prefiled direct, rebuttal, and surrebuttal testimony. The evidentiary hearing began on March 15, 2010, and continued through March 26. The parties indicated they had no contested true-up issues and the Commission cancelled the true-up hearing scheduled for April 12 and 13, 2010.

⁴ The members of MEUA are Wal-Mart Stores and Best Buy Co. Inc.

The parties filed post-hearing briefs on April 23, 2010, with reply briefs following on April 30. Based on the revised true-up reconciliation filed by Staff on April 14, 2010, AmerenUE has reduced its rate increase request to \$286,930,749.

Pending Motion

Following the hearing, on April 22, Staff and AmerenUE filed a written motion offering certain true-up exhibits into evidence. The written motion was necessary because the true-up hearing was cancelled at the request of the parties. The Commission issued an order on April 23 that established April 26 as the deadline for the parties to object to the admission of any of the submitted exhibits. MIEC filed a response on April 26 entitled *Objection to True-Up Reconciliation*. Despite its title, MIEC's pleading did not object to the admission of the true-up reconciliation that had been submitted by Staff as exhibit 244. Rather, MIEC's pleading asked the Commission to modify that reconciliation to correctly reflect MIEC's position on steam production – net salvage. The Commission issued an order on April 27 that modified the reconciliation as requested by MIEC and admitted all the true-up exhibits into evidence.

On May 3, AmerenUE filed a motion asking the Commission to modify a portion of its April 27 order admitting the true-up exhibits into evidence by rejecting the modification to the reconciliation offered by MIEC. MIEC filed suggestions in opposition to that motion on May 3.

AmerenUE contends the reconciliation should not be modified to reflect MIEC's asserted position on depreciation because that position is not supported by the evidence in the record. MIEC responds by asserting that its adjustment is correct. The challenged exhibit is simply Staff's reconciliation that purports to evaluate the monetary value of the

positions asserted by the various parties. At any rate, AmerenUE's motion indicates its motion will be moot if the Commission uses the life span approach to depreciation advocated by the company. This report and order does use the life span approach advocated by AmerenUE, so the motion is moot. On that basis, AmerenUE's Motion to Modify Order Admitting True-Up Exhibits is denied.

The Partial Stipulations and Agreements

During the course of the evidentiary hearing, various parties filed four nonunanimous partial stipulations and agreements resolving issues that would otherwise have been the subject of testimony at the hearing. No party opposed those partial stipulations and agreements. As permitted by its regulations, the Commission treated the unopposed partial stipulations and agreements as unanimous.⁵ After considering both stipulations and agreements, the Commission approved them as a resolution of the issues addressed in those agreements.⁶ The issues resolved in those stipulations and agreements will not be further addressed in this report and order, except as they may relate to any unresolved issues.

On March 17, 2010, the Office of the Public Counsel, Noranda, MIEC, AARP and the Consumers Council of Missouri, and the Missouri Retailers Association filed an additional non-unanimous stipulation and agreement that would have resolved various class cost of service and rate design issues.⁷ MEUA opposed that non-unanimous stipulation and agreement, and as provided in the Commission's rules, the Commission will consider that

⁵ Commission Rule 4 CSR 240-2.115(C).

⁶ The Commission issued an *Order Approving First Stipulation and Agreement* on March 24, 2010. The Commission issued an *Order Approving Second Stipulation and Agreement, Third Stipulation and Agreement, and Market Energy Prices Stipulation and Agreement* on April 14, 2010.

⁷ The same parties filed an addendum to their stipulation and agreement on March 26, 2010. MEUA also opposed that addendum.

stipulation and agreement to be merely a position of the signatory parties to which no party is bound.⁸ The issues that were the subject of that stipulation and agreement will be determined in this report and order.

Overview

AmerenUE is an investor-owned integrated electric utility providing retail electric service to large portions of Missouri, including the St. Louis Metropolitan area. AmerenUE has approximately 1.2 million retail electric customers in Missouri, more than 1 million of whom are residential customers.⁹ AmerenUE also operates a natural gas utility in Missouri but the rates it charges for natural gas are not at issue in this case.

AmerenUE began the rate case process when it filed its tariff on July 24, 2009. In doing so, AmerenUE asserted it was entitled to increase its retail rates by \$401.5 million per year, an increase of approximately 18 percent.¹⁰ AmerenUE attributed approximately \$227 million of that increase to the rebasing of fuel costs that would otherwise be passed through to customers by operation of the company's existing fuel adjustment clause.¹¹ AmerenUE set out its rationale for increasing its rates in the direct testimony it filed along with its tariff on July 24. In addition to its filed testimony, AmerenUE provided work papers and other detailed information and records to the Staff of the Commission, Public Counsel, and to the intervening parties. Those parties then had the opportunity to review AmerenUE's testimony and records to determine whether the requested rate increase was justified.

⁸ Commission Rule 4 CSR 240-2.115(2)(D).

⁹ Baxter Direct, Ex. 100, Page 4, Lines 14-15.

¹⁰ Baxter Direct, Ex. 100, Page 5, Lines 7-8.

¹¹ Baxter Direct, Ex. 100, Page 5, Lines 8-11.

Where the parties disagreed, they prefiled written testimony to raise those issues to the attention of the Commission. All parties were given an opportunity to prefile three rounds of testimony – direct, rebuttal, and surrebuttal. The process of filing testimony and responding to the testimony filed by other parties revealed areas of agreement that resolved some issues and areas of disagreement that revealed new issues. On March 8, the parties filed a list of the issues they asked the Commission to resolve.

As previously indicated, a number of the identified issues were resolved by the approved partial stipulations and agreements and will not be further addressed in this report and order. The remaining issues will be addressed in turn.

Conclusions of Law Regarding Jurisdiction

A. AmerenUE is a public utility, and an electrical corporation, as those terms are defined in Section 386.020(43) and (15), RSMo (Supp. 2009). As such, AmerenUE is subject to the Commission’s jurisdiction pursuant to Chapters 386 and 393, RSMo.

B. Section 393.140(11), RSMo 2000, gives the Commission authority to regulate the rates AmerenUE may charge its customers for electricity. When AmerenUE filed a tariff designed to increase its rates, the Commission exercised its authority under Section 393.150, RSMo 2000, to suspend the effective date of that tariff for 120 days beyond the effective date of the tariff, plus an additional six months.

Conclusions of Law Regarding the Determination of Just and Reasonable Rates

A. In determining the rates AmerenUE may charge its customers, the Commission is required to determine that the proposed rates are just and reasonable.¹² AmerenUE has the burden of proving its proposed rates are just and reasonable.¹³

¹² Section 393.150.2, RSMo 2000.

B. In determining whether the rates proposed by AmerenUE are just and reasonable, the Commission must balance the interests of the investor and the consumer.¹⁴

In discussing the need for a regulatory body to institute just and reasonable rates, the United States Supreme Court has held as follows:

Rates which are not sufficient to yield a reasonable return on the value of the property used at the time it is being used to render the services are unjust, unreasonable and confiscatory, and their enforcement deprives the public utility company of its property in violation of the Fourteenth Amendment.¹⁵

In the same case, the Supreme Court provided the following guidance on what is a just and reasonable rate:

What annual rate will constitute just compensation depends upon many circumstances and must be determined by the exercise of a fair and enlightened judgment, having regard to all relevant facts. A public utility is entitled to such rates as will permit it to earn a return on the value of the property which it employs for the convenience of the public equal to that generally being made at the same time and in the same general part of the country on investments in other business undertakings which are attended by corresponding risks and uncertainties; but it has no constitutional right to profits such as are realized or anticipated in highly profitable enterprises or speculative ventures. The return should be reasonably sufficient to assure confidence in the financial soundness of the utility and should be adequate, under efficient and economical management, to maintain and support its credit and enable it to raise the money necessary for the proper discharge of its public duties. A rate of return may be reasonable at one time and become too high or too low by changes affecting opportunities for investment, the money market and business conditions generally.¹⁶

The Supreme Court has further indicated:

'[R]egulation does not insure that the business shall produce net revenues.' But such considerations aside, the investor interest has a legitimate concern with the financial integrity of the company whose rates are being regulated.

¹³ *Id.*

¹⁴ *Federal Power Commission v. Hope Natural Gas Co.*, 320 U.S. 591, 603, (1944).

¹⁵ *Bluefield Water Works & Improvement Co. v. Public Service Commission of the State of West Virginia*, 262 U.S. 679, 690 (1923).

¹⁶ *Id.* at 692-93.

From the investor or company point of view it is important that there be enough revenue not only for operating expenses but also for the capital costs of the business. These include service on the debt and dividends on the stock. By that standard the return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks. That return, moreover, should be sufficient to assure confidence in the financial integrity of the enterprise, so as to maintain its credit and to attract capital.¹⁷

C. In undertaking the balancing required by the Constitution, the Commission is not bound to apply any particular formula or combination of formulas. Instead, the Supreme Court has said:

Agencies to whom this legislative power has been delegated are free, within the ambit of their statutory authority, to make the pragmatic adjustments which may be called for by particular circumstances.¹⁸

D. Furthermore, in quoting the United States Supreme Court in *Hope Natural Gas*, the Missouri Court of Appeals said:

[T]he Commission [is] not bound to the use of any single formula or combination of formulae in determining rates. Its rate-making function, moreover, involves the making of 'pragmatic adjustments.' ... Under the statutory standard of 'just and reasonable' it is the result reached, not the method employed which is controlling. It is not theory but the impact of the rate order which counts.¹⁹

The Rate Making Process

The rates AmerenUE will be allowed to charge its customers are based on a determination of the company's revenue requirement. AmerenUE's revenue requirement is calculated by adding the company's operating expenses, its depreciation on plant in rate base, taxes, and its rate of return multiplied by its rate base. The revenue requirement can

¹⁷ *Federal Power Commission v. Hope Natural Gas Co.*, 320 U.S. 591, 603 (1944) (citations omitted).

¹⁸ *Federal Power Commission v. Natural Gas Pipeline Co.* 315 U.S. 575, 586 (1942).

¹⁹ *State ex rel. Associated Natural Gas Co. v. Pub. Serv. Comm'n*, 706 S.W. 2d 870, 873 (Mo. App. W.D. 1985).

be expressed as the following formula:

Revenue Requirement = $E + D + T + R(V-AD+A)$
Where: E = Operating expense requirement
D = Depreciation on plant in rate base
T = Taxes including income tax related to return
R = Return requirement
(V-AD+A) = Rate base
For the rate base calculation:
V = Gross Plant
AD = Accumulated depreciation
A = Other rate base items

All parties accept the basic formula. Disagreements arise over the amounts that should be included in the formula.

The Issues

1. Rate of Return

Findings of Fact:

Introduction:

1. This issue concerns the rate of return AmerenUE will be authorized to earn on its rate base. Rate base includes things like generating plants, electric meters, wires and poles, and the trucks driven by AmerenUE's repair crews. In order to determine a rate of return, the Commission must determine AmerenUE's cost of obtaining the capital it needs.

a. Capital Structure

2. The relative mixture of sources AmerenUE uses to obtain the capital it needs is its capital structure. All parties agree that AmerenUE's actual capital structure as of the true-up date, January 31, 2010, should be used for purposes of establishing its rates in this case. Staff's True-Up Accounting Schedules described AmerenUE's actual capital structure as of January 31, 2010 as:

Long-Term Debt	47.26%
----------------	--------

Short-Term Debt	00.00%
Preferred Stock	01.48%
Common Equity	51.26% ²⁰

Since all parties accept this capital structure, the Commission will not further address this matter.

3. Similarly, AmerenUE's calculation of the cost of its long-term debt and preferred stock is not disputed by any party,²¹ and will not be further addressed.

b. Return on Equity

Introduction:

4. Determining an appropriate return on equity is without a doubt the most difficult part of determining a rate of return. The cost of long-term debt and the cost of preferred stock are relatively easy to determine because their rate of return is specified within the instruments that create them.²² In contrast, in determining a return on equity, the Commission must consider the expectations and requirements of investors when they choose to invest their money in AmerenUE rather than in some other investment opportunity. As a result, the Commission cannot simply find a rate of return on equity that is unassailably scientifically, mathematically, or legally correct. Such a "correct" rate does not exist. Instead, the Commission must use its judgment to establish a rate of return on equity attractive enough to investors to allow the utility to fairly compete for the investors' dollar in the capital market, without permitting an excessive rate of return on equity that would drive up rates for AmerenUE's ratepayers. In order to obtain guidance about the

²⁰ Staff True-Up Accounting Schedules, Ex. 243, Schedule 12.

²¹ Transcript, Page 1953, Lines 3-5.

²² Lawton Direct, Ex. 304, Page 9, Lines 4-5.

appropriate rate of return on equity, the Commission considers the testimony of expert witnesses.

5. Four financial analysts offered recommendations regarding an appropriate return on equity in this case. Dr. Roger A. Morin testified on behalf of AmerenUE. Dr. Morin is Emeritus Professor of Finance at Robinson College of Business, Georgia State University, and Professor of Finance for Regulated Industry at the Center for the Study of Regulated Industry at Georgia State University. He holds a Bachelor of Engineering degree and an MBA in Finance from McGill University, as well as a Ph.D. in Finance and Econometrics from the Wharton School of Finance, University of Pennsylvania.²³ He recommends the Commission allow AmerenUE a return on equity of 10.8 percent.²⁴

6. David Murray testified on behalf of Staff. Murray is the Acting Utility Regulatory Manager of the Financial Analysis Department for the Commission. He holds a Bachelor of Science degree in Business Administration from the University of Missouri – Columbia, and a MBA from Lincoln University. Murray has been employed by the Commission since 2000 and has offered testimony in many cases.²⁵ Murray recommends a return on equity within a range of 9.0 percent to 9.7 percent,²⁶ with a recommended midpoint of 9.35 percent.²⁷

7. Stephen G. Hill also offered rate of return testimony on behalf of Staff. Hill is self-employed as a financial consultant, specializing in financial and economic issues in regulated industries. He earned a Bachelor of Science degree in Chemical Engineering from Auburn University, and a Masters degree in Business Administration from Tulane

²³ Morin Direct, Ex. 111, Page 1, Lines 6-16.

²⁴ Morin Rebuttal, Ex. 112, Page 52, Line 13.

²⁵ Staff Report – Revenue Requirement/Cost of Service, Ex. 200, Appendix 1, Page 42.

²⁶ Staff Report – Revenue Requirement/Cost of Service, Ex. 200, Page 37, Lines 24-26.

²⁷ Transcript, Page 2022, Lines 24-25.

University.²⁸ Hill did not offer a recommended a return on equity for AmerenUE. Instead, he offered testimony to support Murray's recommended rate of return, and to rebut the testimony offered by the other testifying return-on-equity witnesses.²⁹

8. Michael Gorman testified on behalf of MIEC. Gorman is a consultant in the field of public utility regulation.³⁰ He holds a Bachelors of Science degree in Electrical Engineering from Southern Illinois University and Masters Degree in Business Administration with a concentration in Finance from the University of Illinois at Springfield.³¹ Gorman recommends the Commission allow AmerenUE a return on equity within a range of 9.5 percent to 10.5 percent, with a recommended midpoint of 10.0 percent.³²

9. Finally, Daniel J. Lawton testified on behalf of Public Counsel. Lawton is a consultant who holds a Bachelor of Arts degree in Economics from Merrimack College and a Master of Arts in Economics from Tufts University.³³ Lawton recommends the Commission allow AmerenUE a return on equity within a range of 9.3 percent to 10.9 percent,³⁴ with a recommended midpoint of 10.1 percent.³⁵

Specific Findings of Fact:

10. A utility's cost of common equity is the return investors require on an investment in that company. Investors expect to achieve their return by receiving dividends and stock

²⁸ Hill Rebuttal, Ex. 212, Page 1, Lines 7-15.

²⁹ Hill Surrebuttal, Ex. 213, Pages 22-23, Lines 20-26, 1-23.

³⁰ Gorman Direct, Ex. 408, Page 1, Line 5.

³¹ Gorman Direct, Ex. 408, Appendix A, Page 1, Lines 10-12.

³² Gorman Direct, Ex. 408, Page 2, Lines 9-11.

³³ Lawton Direct, Ex. 304, Schedule DJL-1.

³⁴ Lawton Direct, Ex. 304, Page 5, Lines 11-12.

³⁵ Transcript, Page 2186, Lines 15-17.

price appreciation³⁶ Financial analysts use variations on three generally accepted methods to estimate a company's fair rate of return on equity. The Discounted Cash Flow (DCF) method assumes the current market price of a firm's stock is equal to the discounted value of all expected future cash flows. The Risk Premium method assumes that all the investor's required return on an equity investment is equal to the interest rate on a long-term bond plus an additional equity risk premium to compensate the investor for the risks of investing in equities compared to bonds. The Capital Asset Pricing Method (CAPM) assumes the investor's required rate of return on equity is equal to a risk-free rate of interest plus the product of a company-specific risk factor, beta, and the expected risk premium on the market portfolio. No one method is any more "correct" than any other method in all circumstances. Analysts balance their use of all three methods to reach a recommended return on equity.

11. Before examining the analyst's use of these various methods to arrive at a recommended return on equity, it is important to look at another number. For 2009, the average return on equity awarded to integrated electric utilities by state commissions in this country was 10.59 percent, as reported by Regulatory Research Associates.³⁷

12. The Commission mentions the average allowed return on equity not because the Commission should, or would slavishly follow the national average in awarding a return on equity to AmerenUE. However, AmerenUE must compete with other utilities all over the country for the same capital. Therefore, the average allowed return on equity provides a reasonableness test for the recommendations offered by the return on equity experts.

³⁶ Gorman Direct, Ex. 408, Page 15, Lines 10-12.

³⁷ Morin Rebuttal, Ex. 112, Page 2, Lines 11-14.

13. In his direct testimony filed on behalf of AmerenUE, which he submitted in July 2009, Dr. Morin recommended AmerenUE be allowed a return on equity of 11.5 percent.³⁸ By February 11, 2010, when he submitted his rebuttal testimony, Dr. Morin had reduced this recommended return on equity to 10.8 percent.³⁹ Dr. Morin did not change his methodology, but his updated analysis used December 2009 stock prices that were higher than the prices he had used in his July 2009 testimony.⁴⁰ He testified that his rebuttal testimony was intended to supersede his direct testimony⁴¹ and that a recommendation of 11.5 percent would be ludicrous at the time of the hearing.⁴² The Commission will consider Dr. Morin's recommendation of 10.8 percent when deciding an appropriate return on equity for AmerenUE.

14. Three of the four return on equity experts offered recommendations between 10.0 percent and 10.8 percent. The fourth recommendation, the 9.35 percent recommended by Staff's witness David Murray, is lower than the other recommendations, and is substantially lower than the 2009 national average of allowed returns on equity of 10.59 percent.⁴³

15. Murray's recommendation is low because the three stage DCF analysis he performed relies on an unreasonably low long-term growth estimate of 3.1 percent. Murray based his long-term growth rate on the Energy Information Administration's projection of long-term growth in the usage of electricity plus an inflation factor.⁴⁴ Murray's calculation of

³⁸ Morin Direct, Ex. 111, Page 5, Lines 17-20.

³⁹ Morin Rebuttal, Ex. 112, Page 56, Lines 9-11.

⁴⁰ Morin Rebuttal, Ex. 112, Pages 52-53.

⁴¹ Transcript, Page 1828, Lines 1-4.

⁴² Transcript, Page 1898, Lines 19-20.

⁴³ Morin Rebuttal, Ex. 112, Page 6, Lines 22-28.

⁴⁴ Staff Report – Revenue Requirement/Cost of Service, Pages 26-27, Lines 6-28, 1-8.

a long-term growth rate based on the anticipated growth of demand for electricity is inconsistent with the requirements of the DCF model, which relies on earnings/dividends growth.⁴⁵ If Murray had instead relied on the historical growth in real GDP for the United States from 1929 through 2008, plus an inflation factor, he would have derived a long-term growth forecast of 6.0 percent.⁴⁶

16. Murray's DCF analysis also contrasts sharply with the DCF analysis performed by the other return on equity experts, who relied on forecasted growth rates published by reputable investment analysts. As Public Counsel's witness, Daniel Lawton, explained at the hearing, the growth in the use of electricity is not a good measure of the actual growth in an electric utilities earnings because earnings growth can come from more than just the growth in the demand for electricity.⁴⁷ Lawton also defended his, and other analyst's use of forecasted growth rates, testifying: "relying on published price, dividend and growth rate data and forecasts is not different or unique. ... this is what regulatory authorities typically consider to determine a reasonable return for setting fair and just rates for consumers."⁴⁸ Lawton testified that he would never use projected growth in electricity demand as a component in the growth rate in a DCF analysis so long as analyst forecasts were available⁴⁹ and that he has never seen another analyst use such a projection in the way Murray used it.⁵⁰

⁴⁵ Morin Rebuttal, Ex. 112, Page 18, Lines 1-2.

⁴⁶ Morin Rebuttal, Ex. 112, Page 18, Lines 6-22.

⁴⁷ Transcript, Page 2183, Lines 19-25.

⁴⁸ Lawton Surrebuttal, Ex. 306, Page 5, Lines 15-18.

⁴⁹ Transcript, Page 2211, Lines 8-15.

⁵⁰ Transcript, Pages 2210-2211, Lines 12-25, 1-7.

17. In an attempt to support the reasonableness of his very low return on equity recommendation, Murray cites several analyst reports that suggest they anticipate AmerenUE will earn a return on equity of under 9 percent.⁵¹ As further support, Murray points to information from the Missouri State Employees' Retirement System's website that would indicate the pension fund expects future returns on equities of only 8.5 percent.⁵²

18. Murray's reliance on analyst reports to support his recommendation is misplaced. Most investors do not have access to the specific analyst reports that Murray examined and thus they cannot rely on them in deciding where to invest their money.⁵³ More fundamentally, the analyst reports upon which Murray relies are designed to project what the analyst expects a company to earn, not what would be a reasonable return for the company to earn.⁵⁴ In other words, an analyst may conclude that AmerenUE will not earn a reasonable return and recommend that investors not invest in that company. That analyst's projection should not then be used to test the reasonableness of a recommendation of the amount a company will need to earn to attract investment.

19. Similarly, Murray's use of information about the investment expectations of a state pension fund to test the reasonableness of his recommendation is not appropriate. Murray indicated he is not aware of any other analyst who uses such information in that manner;⁵⁵ although Staff's other return on equity witness, Stephen Hill, recently had a similar

⁵¹ Staff Report – Revenue Requirement/Cost of Service, Ex. 200, Pages 31-35.

⁵² Staff Report – Revenue Requirement/Cost of Service, Ex. 200, Page 35, Lines 20-27.

⁵³ Transcript, Page 2213, Lines 4-24.

⁵⁴ Transcript, Page 2298, Lines 3-11.

⁵⁵ Transcript, Page 2058, Lines 2-8.

argument rejected by the California PUC.⁵⁶ The problem with using a pension fund's expectations in this way is that pension funds have different investment goals and thus are not well suited to assessing the cost of equity capital in a rate proceeding.⁵⁷

20 The Commission finds that Staff's recommended return on equity of 9.3 percent is not an appropriate return on equity for AmerenUE.

21. The other three witnesses who recommend rates of return used similar methods of analysis and achieved similar results.⁵⁸ The recommendations offered by Gorman for MIEC and Lawton for Public Counsel are very close to each other, with Gorman at 10.0 percent and Lawton at 10.1 percent. Dr. Morin is higher at 10.8 percent.

22. Part of the reason Dr. Morin's recommendation is higher than the other recommendations is that the only DCF model he relied on was a constant growth DCF model. As Gorman explained in describing why he did not rely on this own constant growth DCF results that showed a return on equity of 11.2 percent, "the constant growth DCF return is not reasonable and represents an overstated return for AmerenUE at this time."⁵⁹ He went on to explain that the constant growth DCF result is overstated because it is based on a unsustainably high dividend yield and median growth rate.⁶⁰ Morin's constant growth DCF suffers from the same deficiencies as Gorman described for his own constant growth analysis.⁶¹

⁵⁶ Morin Rebuttal, Ex. 112, Page 26, Lines 1-30, *citing, In re S. Cal Edison Co.*, 262 P.U.R. 4th 53, 72 (Ca. Pub. Utils. Comm'n. 2007).

⁵⁷ Morin Rebuttal, Ex. 112, Pages 26-27, Lines 33-34, 1-5., *see also*, Transcript, Page 2212, Lines 4-19.

⁵⁸ Transcript, Page 1839, Lines 8-13.

⁵⁹ Gorman Direct, Ex. 408, Page 24, Lines 11-12.

⁶⁰ Gorman Direct, Ex. 408, Page 24, Lines 12-16.

⁶¹ Gorman Rebuttal, Ex. 409, Page 10, Lines 1-6.

23. Gorman and Lawton took those deficiencies into account and based their recommendations on additional sustainable growth DCF and multi-stage DCF models. Gorman's sustainable long-term growth rate resulted in a median DCF return of 10.2 percent,⁶² while his multi-stage growth rate resulted in a DCF return of 10.16 percent.⁶³ Lawton's two-stage DCF analysis showed a cost of equity between 10.2 and 10.4 percent,⁶⁴ compared to the 10.9 to 11.1 percent cost of equity shown by his constant growth DCF analysis.⁶⁵

24. In contrast, despite his belief that it is important to "use a whole bunch of techniques",⁶⁶ Morin relied on his constant growth DCF analysis and did not analyze any other form of DCF. However, in his rebuttal testimony, Gorman reworked Morin's constant growth DCF analysis as a multi-stage growth analysis, using updated stock price data, current dividends and recent analysts' growth rate estimates. Gorman arrived at a 10.0 percent cost of equity, which is 56 basis points lower than his similar reworking of Morin's constant growth DCF analysis.⁶⁷ All three analysts balanced the results of their DCF analysis with risk premium and CAPM analyses that ranged between the low to mid 9 percent and the low ten percent area. Thus, the chief difference between their recommendations is their non-constant growth analyses. Therefore, it is reasonable to believe that if Dr. Morin had performed a multi-stage DCF analysis, as he should have, his recommendation might be in the low 10 percent area along with Gorman and Lawton.

⁶² Gorman Direct, Ex. 408, Page 31, Lines 13-14.

⁶³ Gorman Direct, Ex. 408, Page 34, Lines 5-8.

⁶⁴ Lawton Direct, Ex. 304, Page 25, Lines 19-21.

⁶⁵ Lawton Direct, Ex. 304, Page 24, Lines 15-16.

⁶⁶ Transcript, Page 1890, Lines 23-24.

⁶⁷ Gorman Rebuttal, Ex. 409, Page 12, Lines 1-8.

25. Based on its consideration of the testimony of all the experts, the Commission finds that a return on equity of 10.1 percent is a fair and reasonable return on equity for AmerenUE at this time. That is the return on equity recommended by Lawton and the Commission finds that Lawton was the most credible and reliable expert witness. However, 10.1 percent is a reasonable return on equity *aside from the fact that it happens to match the recommendation of one of the witnesses.* The Commission's decision to use the return on equity recommended by Lawton should not be taken to disparage the credibility of the other witnesses.

26. A return on equity of 10.1 percent is somewhat lower than the 10.59 percent 2009 average return on equity awarded to integrated electric utilities by state commissions. However, as Dr. Morin and the other expert witnesses indicated, economic facts have changed substantially since 2009. Dr. Morin's own recommendation dropped 70 basis points between July 2009 and February 2010 due to changes in the capital market.⁶⁸ Therefore, a slight reduction in allowed return on equity from the 2009 average is reasonable.

Conclusions of Law:

A. In assessing the Commission's ability to use different methodologies to determine just and reasonable rates, the Missouri Court of Appeals has said:

Because ratemaking is not an exact science, the utilization of different formulas is sometimes necessary. ... The Supreme Court of Arkansas, in dealing with this issue, stated that there is no 'judicial mandate requiring the Commission to take the same approach to every rate application or even to consecutive applications by the same utility, when the commission in its expertise, determines that its previous methods are unsound or inappropriate

⁶⁸ Transcript, Page 1827, Lines 9-21.

to the particular application' (quoting *Southwestern Bell Telephone Company v. Arkansas Public Service Commission*, 593 S.W. 2d 434 (Ark 1980)).⁶⁹

Furthermore,

Not only can the Commission select its methodology in determining rates and make pragmatic adjustments called for by particular circumstances, but it also may adopt or reject any or all of any witnesses' testimony.⁷⁰

B. In another case, the Court of Appeals recognized that the establishment of an appropriate rate of return is not a "precise science":

While rate of return is the result of a straight forward mathematic calculation, the inputs, particularly regarding the cost of common equity, are not a matter of 'precise science,' because inferences must be made about the cost of equity, which involves an estimation of investor expectations. In other words, some amount of speculation is inherent in any ratemaking decision to the extent that it is based on capital structure, because such decisions are forward-looking and rely, in part, on the accuracy of financial and market forecasts.⁷¹

Decision:

Based on the evidence in the record, on its analysis of the expert testimony offered by the parties, and on its balancing of the interests of the company's ratepayers and shareholders, as fully explained in its findings of fact and conclusions of law, the Commission finds that 10.1 percent is a fair and reasonable return on equity for AmerenUE. The Commission finds that this rate of return will allow AmerenUE to compete in the capital market for the funds needed to maintain its financial health.

⁶⁹ *State ex rel. Assoc. Natural Gas Co. v. Public Service Commission*, 706 S.W. 2d 870, 880 (Mo. App. W.D. 1985).

⁷⁰ *Id.*

⁷¹ *State ex rel. Missouri Gas Energy v. Public Service Commission*, 186 S.W.3d 376, 383 (Mo App. W.D. 2005).

2. Depreciation

Findings of Fact:

Introduction to Depreciation Issues:

1. Depreciation is the means by which a utility is able to recover the cost of its investment in its rate base by recognizing the reduction in value of that property over the estimated useful life of the property. Depreciation rates should be designed to allow the utility to recover, over the average service life of the assets in that account, the original cost of the assets, plus an estimate of any cost to remove the asset, less scrap value of the asset.⁷²

2. The fundamental goal of depreciation is to ensure that the correct amount of depreciation is recovered from each generation of customers over the actual service life of the property.⁷³ If a depreciation rate is set too high, an excess amount will be recovered from current customers. If a depreciation rate is set too low, the cost of the asset will not be fully recovered during its life, and the unrecovered cost will be dumped on the customers receiving service at the time the asset is retired.

3. The parties disagreed about several aspects of depreciation. The most fundamental disagreement is about whether to use a life span or a mass property approach to determine an appropriate depreciation rate for AmerenUE's steam and hydraulic electric production plant accounts. That is the first depreciation issue the Commission will address.

a. Use of Life Span Versus Mass Property Approach to Determine Depreciation Rates for Steam and Hydraulic Plant Accounts

Introduction:

⁷² Staff Report – Revenue Requirement/Cost of Service, Ex. 200, Page 96, Lines 9-11.

⁷³ Wiedmayer Rebuttal, Ex. 105, Page 15, Lines 2-5.

4. John Wiedmayer, a consultant with Gannet Fleming, Inc., sponsored the depreciation study submitted by AmerenUE⁷⁴. His depreciation study uses a life span approach for determining appropriate depreciation rates for steam and hydraulic plant accounts. The steam and hydraulic plants to which these depreciation rates would apply, are AmerenUE's four coal-fired steam generating electric plants, the Meramec, Sioux, Labadie, and Rush Island stations, and hydraulic generating plants at Osage (Bagnall Dam), Keokuk, and Taum Sauk.

5. Arthur Rice, a Utility Regulatory Engineer I for the Commission sponsored a depreciation study submitted by Staff.⁷⁵ Staff's depreciation study treats all steam production and all hydraulic plant as mass property.

6. James Selecky, a consultant with Brubaker & Associates,⁷⁶ and William Dunkel, a consultant with William Dunkel and Associates,⁷⁷ offered testimony on behalf of MIEC that proposed adjustments to the depreciation studies of both AmerenUE and Staff. Selecky advocated the use of a mass property approach because this Commission has used that approach in the past. As an alternative, Selecky suggested modifications to AmerenUE's life span approach if the Commission decided to use that approach.

7. The life span approach to depreciation is premised on the fact that the equipment in a power plant does not remain unchanged during the life of the plant. Instead, interim additions, replacements, and retirements occur regularly throughout the life of the plant.⁷⁸ For example, a particular valve on a boiler might have an estimated service life of 50 years.

⁷⁴ Wiedmayer Direct, Ex. 104, Page 1, Lines 10-11.

⁷⁵ Staff Report – Revenue Requirement/Cost of Service, Ex. 200, Appendix 1. Page 51.

⁷⁶ Selecky Direct, Ex. 404 NP, Page 1, Lines 5-6.

⁷⁷ Dunkel Rebuttal, Ex. 407, Page 1, Lines 6-7.

⁷⁸ Wiedmayer Direct, Ex. 104, Page 5, Lines 9-10.

A depreciation rate for that valve would be set accordingly. In a power plant that went into service in 1960, that valve might be replaced in 2010 with a new valve that again has an estimated service life of 50 years. However, the valve installed into the plant in 2010 has been installed in a power plant that is already 50 years old. If it is assumed that the entire power plant will be retired when it is 60 years old, in 2020, the estimated service life of the valve installed in 2010 will have to be truncated at 10 years. Thus, the depreciation rate for that valve will need to be set to recover its cost over 10 years instead of 50. The life span approach reflects the unique average service lives that are experienced by each year of installation by recognizing the amount of time remaining between the year of installation and the anticipated final retirement of the power plant.

8. For purposes of its life span depreciation study, AmerenUE engaged the services of Black & Veatch Corporation to prepare a study to estimate the retirement dates for its steam powered electric plants.⁷⁹ Larry Loos, a Professional Engineer employed by Black & Veatch, sponsored that study through his testimony. The Black & Veatch study estimated the following retirement dates for AmerenUE's steam generating plants:

Meramec	2022
Sioux	2033
Labadie – Units 3 and 4	2038
Labadie – Units 1 and 2	2042
Rush Island	2046 ⁸⁰

⁷⁹ Loos Direct, Ex. 107, Page 5, Lines 18-19.

⁸⁰ Loos Direct, Ex 107, Page 14, Lines 2-8.

9. To estimate retirement dates for the hydraulic plants, AmerenUE assumed that the plants would be retired when the operating licenses for the plants expire.⁸¹ The resulting estimated retirement dates for the hydraulic plants are as follows:

Osage	2047
Keokuk	2055
Taum Sauk	2049 ⁸²

10. Staff contends that estimated retirement dates for power plants are inherently unreliable. For that reason, Staff advises the Commission to use a mass property approach to establish depreciation rates for those accounts. Under a mass property approach, all steam plant property from all the plants is examined in a single mortality study. That single study does not differentiate between interim and final retirements; all retirements are considered when determining an estimated service life for the property. Because final retirements that occur when an entire power plant is retired are included in the mix, Staff contends the early retirement of some property will be taken into account when depreciation rates are established.⁸³

Specific Findings of Fact:

11. There is nothing wrong with the use of a mass property approach in theory. For some items of property it is perfectly appropriate and is properly used for many purposes in the depreciation studies of both AmerenUE and Staff. For example, the mass property approach is used to determine depreciation rates for items such as poles, meters, and line transformers. Every year AmerenUE adds thousands of poles, meters, and line

⁸¹ Wiedmayer Rebuttal, Ex. 105, Page 12, Lines 3-12.

⁸² Wiedmayer Direct, Ex. 104, Schedule JFW-E1, Page III-6.

⁸³ Staff Report – Revenue Requirement/Cost of Service, Ex. 200, Page 104, lines 1-29.

transformers to its system. Those individual poles may be retired at any age, depending upon accidents, lightning strikes, road construction, insect damage, or any number of independent causes.⁸⁴ The key point is that the life of each pole is independent of other poles. One may be hit by a truck when it is only one year old, while another may still be in service 60 years later. But there are enough poles in service to allow for a meaningful study to determine how long an average pole will remain in service and establish a depreciation rate accordingly.

12. The problem with treating power plant equipment as mass property is that retirements of large electric power plants are rare events. When Staff's witness examined AmerenUE's property retirement data, that data included final retirement data from only four steam plants, Mound, Cahokia, Venice 1 and Venice 2.⁸⁵ The first three of those retired plants were old, small, and inefficient plants retired in the 1970s.⁸⁶ Venice 2 was retired in 2002 after a fire.⁸⁷ Furthermore, there is very little retirement data available from even those plants because the dollars involved are very small compared to AmerenUE's investment in its current steam plants.⁸⁸ There is no final retirement data for the hydraulic plants, as AmerenUE has never shut down a hydraulic plant.⁸⁹

13. Thus, the available retirement data for AmerenUE's steam and hydraulic plants is only indicative of interim retirements that occur during the life of the power plants and fails to provide any useful information about final retirements. As a result, a mass property

⁸⁴ Wiedmayer Rebuttal, Ex. 105, Page 8, Lines 6-12.

⁸⁵ Transcript, Page 1384, Lines 11-16.

⁸⁶ Selecky Rebuttal, Ex. 405, Page 4, Lines 1-14. See also, Wiedmayer, Surrebuttal, Ex. 106, Page 4-5, lines 21-23, 1.

⁸⁷ Selecky Rebuttal, Ex. 405, Pages 4-5, Lines 15-24, 1-5.

⁸⁸ Transcript, Pages 1384-1385, Lines 21-25, 1-2.

⁸⁹ Transcript, Page 1385, Lines 3-8.

analysis will overstate the average service life of the steam plant property.⁹⁰ Indeed, when cross-examined, Staff's witness agreed that he did not have enough data to obtain a true mass property result for the steam or hydraulic plants.⁹¹

14. The problem of a lack of reliable data is likely the reason all authority cited by the parties states that life span is the appropriate method to use in determining depreciation rates for power plant accounts. *Public Utility Depreciation Practices*, published in 1996 by the National Association of Regulatory Utility Commissioners (NARUC), specifically states that electric power plants are to be treated as life span property.⁹² Similarly, the leading textbook on depreciation accounting, *Depreciation Systems*, written by Dr. Frank Wolf and Dr. Chester Finch, clearly indicates that electric generating equipment is to be depreciated using a life span approach instead of a mass property approach.⁹³ Even Staff's own depreciation manual, which Staff's witness relied upon in preparing his depreciation study,⁹⁴ indicates the life span approach is appropriately used to determine depreciation for electric power plants.⁹⁵

15. Not surprisingly, given the support in the literature for the use of the life span approach when determining depreciation rates for electric power plant property, it appears that every other state commission around the country uses the life span approach for

⁹⁰ Wiedmayer Surrebuttal, Ex. 106, Page 9, Lines 1-11.

⁹¹ Transcript, Page 1385, Lines 9-16.

⁹² Wiedmayer Rebuttal, Ex. 105, Pages 12-13, Lines 13-25, 1-4.

⁹³ Wiedmayer Rebuttal, Ex. 105, Page 13, Lines 6-25.

⁹⁴ Transcript, Page 1362, Lines 17-21.

⁹⁵ *Contents & Outline of a Depreciation Study*, Ex. 231, Pages 44-45. Specifically, that manual states: "Unlike mass utility property such as poles, mains, conductors, etc. there exists utility property that requires some forecast as to its date of retirement. Types of plant applicable to this type of analysis are buildings, *electric power plants*, telephone switching equipment, gas storage fields, etc." (emphasis added).

electrical production facilities.⁹⁶ Unfortunately, it appears that the only state commission that has used a mass property approach to determine depreciation rates for electric production facilities is this commission. In an earlier AmerenUE rate case, ER-2007-0002⁹⁷, the Commission authorized the use of a mass property approach for electric production facilities. The Commission did so because of frustration over the inadequate evidence AmerenUE presented to establish reasonably likely retirement dates for its electric power plants.

16. In that earlier case, AmerenUE initially estimated that all its power plants would be retired in 2026. After the other parties criticized that retirement date as arbitrary, the company arbitrarily estimated that all its power plants would be retired 60 years after they went on line. In accepting Staff's proposed mass property proposal in that case, the Commission said "without better evidence of when those plants are likely to be retired, allowing the company to increase its depreciation expense based on what is little more than speculation about possible retirement dates would be inappropriate."⁹⁸ Thus, the Commission authorized the use of a mass property approach in that particular case, but did not reject the life span approach in general.

17. For this case, AmerenUE presented a detailed study by Black & Veatch that presented thoughtfully calculated retirement dates for each of its coal-fired steam production plants. Those estimated retirement dates would retire the steam production

⁹⁶ Wiedmayer Direct, Ex.104, Pages 30-31, Lines 5-23, 1-10.

⁹⁷ *In the Matter of Union Electric Company d/b/a AmerenUE's Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area*, Report and Order, Case No. ER-2007-0002, May 22, 2007.

⁹⁸ *Id.* at Page 84.

plants after between 61 and 72 years of service,⁹⁹ which is on the high-end of estimated retirement dates used for life span analysis for other utilities by other state commissions.¹⁰⁰

18. Aside from a proposal to extend the life span of the Meramec unit, which will be addressed in detail later in this Report and Order, MIEC's expert witness, James Selecky, agreed that the Black & Veatch study produced reasonable retirement dates that he used to develop his own life span depreciation rates. He also agreed that the Black & Veatch study was reasonable and logical, and substantially better than the approach AmerenUE used in ER-2007-0002.¹⁰¹

19. Staff's expert witness, Arthur Rice, agreed that the Black & Veatch study is "relatively complete and logical" and "well done".¹⁰² He also agreed that the estimated retirement dates presented by AmerenUE are "reasonable."¹⁰³ Although Staff's brief claims that AmerenUE's estimated retirement dates are unreliable because AmerenUE did not perform an economic study regarding the retirement of those plants, the number of assumptions and the nature of the assumptions required to make such an economic analysis for events that will happen 12 to 37 years in the future, render such analysis impractical.¹⁰⁴

20. The Black & Veatch study does not independently establish retirement dates for AmerenUE hydraulic production plants. Instead, AmerenUE's life span study assumes that

⁹⁹ Selecky Direct, Ex. 404 NP, Schedule JTS-2.

¹⁰⁰ Transcript, Page 1482, Lines 14-21.

¹⁰¹ Transcript, Page 1483, Lines 3-23.

¹⁰² Transcript, Page 1397, Lines 2-12.

¹⁰³ Exhibit 168.

¹⁰⁴ Loos Surrebuttal, Ex. 108, Page 8, Lines 9-11.

those plants will be retired when their operating licenses expire.¹⁰⁵ That is the same assumption the Commission has previously used to estimate the retirement date of AmerenUE's Callaway nuclear production plant for purposes of a life span depreciation calculation.¹⁰⁶ AmerenUE's estimated retirement dates would have Taum Sauk retire after 86 years of service, Osage after 94 years of service, and Keokuk after 142 years of service.¹⁰⁷

21. There is no way to know for sure when the hydraulic plants will be retired. The same can be said about the steam production plants. But it is unreasonable to assume that the plants will last forever. As previously indicated, a mass property approach is not appropriate because of the lack of available retirement data upon which such a study could be based. A life span depreciation study requires an estimated retirement date and the assumed retirement dates for the hydraulic plants are reasonable.

22. It is important to remember that the assumed retirement dates for purposes of a depreciation study are not fixed forever and certainly do not mean that the plant will actually be retired on the assumed retirement date. Future depreciation studies in future rate cases may rely on different estimated retirement dates as further information becomes available and circumstances change. Ultimately, depreciation rates will be adjusted to match the new information so that the correct amount of depreciation is recovered from each generation of customers over the actual service life of the property.

¹⁰⁵ Wiedmayer Rebuttal, Ex. 105, Page 12, Lines 3-12.

¹⁰⁶ *In the Matter of Union Electric Company d/b/a AmerenUE's Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area*, Report and Order, Case No. ER-2007-0002, May 22, 2007, Pages 87-88.

¹⁰⁷ Selecky Direct, Ex. 404 NP, Schedule JTS-2.

Conclusions of Law:

There are no additional conclusions of law for this issue.

Decision:

The Commission finds that it is appropriate to use a life span approach to determine depreciation rates for AmerenUE's steam and hydraulic electric production accounts. The Commission finds that the estimated retirement dates proposed by AmerenUE for that purpose are reasonable, with the exception of the retirement date for the Meramec steam production plant, which is addressed later in this order.

b. Proposed Extension of the Lifespan of the Meramec Plant

Findings of Fact:

Introduction:

23. AmerenUE currently operates the Meramec coal-fired steam production plant, located southeast of St. Louis, at the confluence of the Meramec and Mississippi Rivers. The Meramec Generating Station has four pulverized coal subcritical power generating units. Units 1 and 2 were built in 1953 and 1954 respectively; each has a capacity of 138 MW. Unit 3, which has a capacity of 289 MW, was built in 1959, while Unit 4, which has a capacity of 359 MW, was built in 1961.¹⁰⁸ The Black & Veatch study upon which AmerenUE relies to calculate depreciation rates for its steam production plant estimates that AmerenUE will retire its Meramec coal-fired steam production plant in 2022.¹⁰⁹ MIEC's

¹⁰⁸ Loos Direct, Ex. 107, Schedule LWL-E1, Appendix B, Page B-2.

¹⁰⁹ Loos Direct, Ex. 107, Page 14, Line 4.

witness, James Selecky, contends the estimated retirement date for the Meramec plant should be extended by five years to 2027.¹¹⁰

Specific Findings of Fact:

24 There are two reasons the estimated retirement date for the Meramec plant should be extended. First, AmerenUE forecasts an average life span for its other steam production units of approximately 69 years. AmerenUE's predicted life span for Meramec Unit 3 is only 63 years, with a predicted life span for Meramec Unit 4 of 61 years. Extending the predicted life span of Meramec by five years would bring it more in line with the predicted life span of the other coal-fired plants.¹¹¹

25. Second, the Black & Veatch study, upon which AmerenUE based its predicted life spans, indicates that its choice of an expected retirement date for the Meramec plant is based, at least in part, on the assumptions of AmerenUE's Integrated Resource Plan.¹¹² That plan assumed that AmerenUE would build a second nuclear reactor at its Callaway plant to replace the capacity of the Meramec plant,¹¹³ but AmerenUE is no longer planning to build Callaway 2,¹¹⁴ and has no plans on how to replace the Meramec plant's capacity.¹¹⁵ That implies that AmerenUE may keep Meramec in operation beyond 2022.

¹¹⁰ Selecky Direct, Ex. 404 NP, Page 22, Lines 1-15.

¹¹¹ Selecky Direct, Ex. 403HC, Page 22, Lines 3-8.

¹¹² Loos Direct, Ex. 107, Page 14, Lines 1-13. The Black & Veatch study is attached to Loos' direct as Schedule LWL-E1. The study's reference to the IRP filing is found at page 3-4 of the schedule.

¹¹³ Transcript, Page 1286, Lines 14-18.

¹¹⁴ Birk Rebuttal, Ex. 103, Page 12, Lines 16-.

¹¹⁵ Transcript, Page 1286, Lines 19-22.

26. Indeed, the study prepared for AmerenUE by Burns & McDonnell Engineering Company indicates the Meramec plant could be kept in operation substantially past 2022 if its capacity is needed and if its operation is economically viable.¹¹⁶

27. Of course, no one can know for certain whether the continued operation of the Meramec plant beyond 2022 will be economically viable. As AmerenUE's own witness testified, the number of assumptions and the nature of the assumptions required make that sort of economic analysis impractical.¹¹⁷ AmerenUE's estimated retirement dates are not set in stone and may change in a future depreciation study as more information becomes available. But based on the evidence presented, the Commission finds that it is reasonable to assume an additional five years of life for the Meramec plant. This adjustment will reduce AmerenUE's revenue requirement by approximately \$10 million.¹¹⁸

Conclusions of Law:

There are no additional conclusions of law for this issue.

Decision:

AmerenUE shall calculate depreciation for its steam production plant based on the assumption that the Meramec steam production plant will be retired in 2027.

c. Net Salvage Percentage for Account 312 Boiler Equipment

Findings of Fact:

Introduction:

28. Net salvage is the salvage value of property retired, less the cost of removal. Net salvage value is positive if the salvage value exceeds removal cost and negative if removal

¹¹⁶ Ex 434 HC, Page 5-2. The entire exhibit is highly confidential so the Commission will not disclose the details of the report.

¹¹⁷ Loos Surrebuttal, Ex. 108, Page 8, Lines 9-11.

¹¹⁸ Transcript, Page 1523, Lines 14-19.

costs exceed the salvage value.¹¹⁹ AmerenUE chose not to request depreciation recovery of terminal net salvage¹²⁰ for its power plants, so the net salvage percentages at issue are only for interim net salvage.¹²¹ AmerenUE's depreciation witness, John Wiedmayer, testified that the historical net salvage indication for Account 312, Boiler Plant Equipment is negative 25 percent. He adjusted his net salvage estimate to 15 percent on the assumption that 60 percent of the retirements are interim retirements, based on an estimated interim survivor curve.¹²² Presumably, the other 40 percent of retirements would be terminal, when the power plant is finally retired.

29. MIEC's depreciation witness, James Selecky, recommended the net salvage ratio for this account be reduced from negative 15 percent to negative 10 percent.¹²³ Selecky recommends this reduction because of his contention that AmerenUE's current interim net salvage depreciation rates have allowed the company to collect more depreciation from customers than the depreciation expenses the company has actually experienced.¹²⁴ To avoid what he describes as an over collection, Selecky calculated the average amount of depreciation expense AmerenUE has experienced over the last five and ten years, adjusted that average for inflation to derive an annual amount AmerenUE could expect to recover over the next thirty years, and reduced the net salvage ratio to allow AmerenUE to recover only that amount.

¹¹⁹ Wiedmayer Rebuttal, Ex. 105, Page 60, Lines 5-9.

¹²⁰ Terminal net salvage relates to decommissioning and dismantlement costs associated with the final retirement of power plants.

¹²¹ Wiedmayer, Rebuttal, Ex. 105, Page 47, Lines 16-19.

¹²² Wiedmayer Rebuttal, Ex. 105, Page 47, Lines 19-23.

¹²³ Selecky Direct, Ex. 404 NP, Page 23, Lines 7-12.

¹²⁴ Selecky Direct, Ex. 404 NP, Page 24, Lines 1-7.

Specific Findings of Fact:

30 Selecky's reliance on recent historical levels of interim net salvage expense to set future rates is misplaced. As Wiedmayer explains in his rebuttal testimony:

net salvage percents are likely to increase as plants age due to the increasing average age of retirements. As the average age of retirements increase, the price level change from the year of initial construction to the year the asset is retired becomes more pronounced and this has an impact on the historical net salvage percents due to the effect of inflation.¹²⁵

For example, a valve that is on the company's books at a cost of \$100 when it was installed in 1960, might have cost \$125 to remove if it had been replaced in 1990. Because of inflation, to remove the same \$100 valve in 2010, might cost \$150. To remove it in 2020 might cost \$175. Thus, for each year that passes, the ratio of cost of removal to the cost of the valve will increase. For that reason, net salvage estimates need to consider what is likely to occur in the future and properly reflect that information in the estimates.

31. Selecky's proposed reduction to the net salvage ratio simply looks at recent historical depreciation expenses and inflates those number by a constant three percent per year.¹²⁶ This arbitrary approach contrasts with Wiedmayer's considered analysis to arrive at a conservative net salvage ratio of 15 percent. In fact, that analysis revealed that a three-year moving average of net salvage percents is above negative 30 percent for every three-year period since 1998.¹²⁷

32. Selecky's only response to Wiedmayer's detailed analysis was to criticize Wiedmayer's decision to reduce his net salvage estimate from negative 25 percent to negative 15 percent based on an assumption that 60 percent of the retirements will be

¹²⁵ Wiedmayer Rebuttal, Ex. 105, Page 48, Lines 8-12.

¹²⁶ Selecky Direct, Ex. 404 NP, Schedule JTS-6.

¹²⁷ Wiedmayer Rebuttal, Ex. 105, Page 48. Lines 14-19.

interim retirements, meaning that the remaining 40 percent would be final retirements. Selecky points out that elsewhere in his testimony, Wiedmayer states that when the four coal plants currently in service retire nearly 50 to 80 percent of the retirements will be final retirements. Selecky implies that this supposed inconsistency makes Wiedmayer's study unreliable and justifies his simpler approach based on recent historical expenses.¹²⁸

33. The supposedly inconsistent statement is in Wiedmayer's rebuttal testimony. When discussing the general mix of interim and final retirements and the difference between life span and mass property analysis, Wiedmayer said "a substantial portion, nearly 50 to 80 percent, of the retirements associated with life span property will occur on one date in the future when the plant is retired."¹²⁹ Wiedmayer's general statement applied to all of the numerous plant accounts for which the company used a life span approach to calculate depreciation rates. For Account 312, the account at issue, the actual data shows that 65 percent of the investment in that account will be retired by interim retirement.¹³⁰ Thus, a closer look at the supposed inconsistency in Wiedmayer study indicates there is no inconsistency.

34. The Commission finds that AmerenUE's use of a negative 15 percent net salvage ratio is well supported by the company's data on interim retirements. The Commission also finds that MIEC's proposed adjustment is not supported by the evidence. MIEC's proposed adjustment to require the use of a negative 10 percent net salvage ratio is rejected.

Conclusions of Law:

There are no additional conclusions of law for this issue.

¹²⁸ Selecky Surrebuttal, Ex. 406, Pages 1-15, Lines 11-24, 1-10.

¹²⁹ Wiedmayer Rebuttal, Ex. 105, Page 20, Lines 3-5.

¹³⁰ Wiedmayer Direct, Ex. 104, Schedule JFW-E1, Page A-5.

Decision:

AmerenUE's use of a negative 15 percent net salvage ratio for Account 312 Boiler Equipment is appropriate. The adjustment to a negative 10 percent net salvage ratio proposed by MIEC is rejected.

d. Inclusion of Retired Steam Generators in Depreciation Analysis for the Callaway Nuclear Plant

Findings of Fact:

Introduction:

35. James Selecky, the witness for MIEC, proposed certain adjustments to AmerenUE's depreciation rates for the Callaway nuclear plant. Those adjustments are predicated on Selecky's adjustment to remove from the plant's retirement history a retirement of four steam generators in 2005.¹³¹ Excluding this particular retirement from the plant's retirement history reduces the interim retirement activity, thereby increasing the average remaining life from 29.8 years to 32.6 years, and decreases the net salvage ratio from a negative 10 percent to a negative 1.2 percent.¹³² These changes would reduce AmerenUE's depreciation expense by approximately \$5 million.¹³³ Both AmerenUE and Staff oppose Selecky's proposed adjustment.

Specific Findings of Fact:

36. In 2005, AmerenUE replaced the four, twenty-year old, steam generators at Callaway. Selecky contends the retirement of the steam generators should not be considered as part of the Callaway plant's retirement history because this retirement is not

¹³¹ Selecky Direct, Ex. 404 NP, Page 18, Lines 5-6.

¹³² Selecky Direct, Ex. 404 NP, Page 19, Lines 7-8.

¹³³ Selecky Rebuttal, Ex. 405, Page 8, Lines 1-8.

typical and dominates the retirement history. This single retirement represents approximately 46 percent of the total retirement in this account from 1986 through 2008. The net salvage expense associated with this retirement is approximately 80 percent of the total net salvage expense this account has incurred since 1986.¹³⁴

37. While this single retirement is substantial compared to retirements that have occurred early in the life of the plant, AmerenUE plans further significant major component replacement projects in the next five years. The retirements associated with those projects will total approximately \$48 million.¹³⁵ Once these retirements occur, the dollars associated with the steam generator replacements will not be extraordinary in relation to the dollars retired in the future.¹³⁶

38. Also, it is not surprising that equipment retirement has been relatively rare early in the life of the plant. However, interim retirements of equipment will increase as the plant ages, meaning that if actual retirement experience from when the plant is young is excluded from the calculation, the calculation will not be representative of the retirement to be expected in the future when the plant is older.¹³⁷

39. The retirement of the steam generators was also unusual in that while the expected design life of the steam generators was 40 years, the steam generators were only

¹³⁴ Selecky Direct, Ex. 404 NP, Page 18, Lines 8-12.

¹³⁵ Wiedmayer Rebuttal, Ex. 105, Page 39, Lines 12-14.

¹³⁶ Wiedmayer Rebuttal, Ex. 105, Page 39, Lines 6-9.

¹³⁷ Wiedmayer Rebuttal, Ex. 105, Page 41, lines 16-20.

approximately 20-years old at the time of replacement.¹³⁸ That means their actual life was only half of what was expected.¹³⁹

40. The shortened life of the generators was due to problems with deteriorating tubes.¹⁴⁰ Because of the problems with the generators, AmerenUE asserted a claim against the manufacturer that resulted in a settlement whereby Westinghouse paid AmerenUE \$10 million in cash. AmerenUE also received a fuel credit of \$20 million and a non-fuel related credit of \$5 million.¹⁴¹

41. Selecky asserts that the payments from Westinghouse are a further indication that the premature retirement of the steam generators is abnormal and should be excluded from the company's retirement history.¹⁴² Indeed, Staff's witness agreed that retirements should be removed from the life analysis if they are found to be reimbursed retirements from insurance proceeds or third party payments.¹⁴³ However, the payments AmerenUE received from Westinghouse do not make this a reimbursed retirement because none of the payments were booked against accumulated depreciation.¹⁴⁴

42. The weakness of Selecky's position is demonstrated by the very low net salvage ratio that he calculates. Selecky proposes a net salvage ratio of just negative 1.2

¹³⁸ Wiedmayer Rebuttal, Ex. 105, Page 37, Lines 14-16.

¹³⁹ Selecky Rebuttal, Ex. 405, Page 6, Lines 13-16.

¹⁴⁰ Wiedmayer Rebuttal, Ex. 105, Page 38, Line 16.

¹⁴¹ Selecky Rebuttal, Ex. 405, Page 6, Lines 17-20. The settlement agreement between Westinghouse and AmerenUE is Ex. 438 HC.

¹⁴² Selecky Rebuttal, Ex. 405, Page 6, Lines 9-12.

¹⁴³ Rice Rebuttal, Ex. 216, Page 4, Lines 14-16.

¹⁴⁴ Transcript, Page 1421, Lines 7-12. Ex. 169 describes how AmerenUE accounted for the payment received from Westinghouse.

percent.¹⁴⁵ Using that ratio would allow AmerenUE to accumulated only \$8.9 million for net salvage for Account 322 over the next 36 years of the life of the Callaway plant. The company has already incurred \$32 million in net salvage in that account over the first 24 years of operation. That means Selecky's net salvage estimate would not allow AmerenUE to recover the amount it has already spent on removal costs, let alone the additional costs it will surely incur over the remaining life of the plant.¹⁴⁶

43. The most important fact is that the steam generators have in fact been retired. That retirement occurred sooner than AmerenUE expected, but it is a part of the plant's retirement history and is not so unusual that it should be ignored. In fact, most nuclear plants have experienced problems with their steam generators and most have replaced or are planning to replace their steam generators.¹⁴⁷ The Commission will reject Selecky's proposed adjustments predicated on the exclusion of the steam generator retirement from the Callaway plant's retirement history.

Conclusions of Law:

There are no additional conclusions of law for this issue.

Decision:

The Commission rejects Selecky's adjustments to the proposed depreciation rates for the Callaway nuclear plant and accepts the depreciation rates proposed by AmerenUE and Staff.

¹⁴⁵ Selecky Direct, Ex. 404 NP, Schedule JTS-4.

¹⁴⁶ Wiedmayer Surrebuttal, Ex. 106, Pages 12-13, 16-26, 1-16.

¹⁴⁷ Wiedmayer Rebuttal, Ex. 105, Page 38, Lines 4-7.

e. **Transmission and Distribution Plant Depreciation**

Findings of Fact:

Introduction:

44. AmerenUE's transmission and distribution accounts include items such as poles and fixtures, overhead conductors and devices, and line transformers.¹⁴⁸ In other words, the equipment used to transmit and distribute electric power to the company's customers. MIEC's witness, James Selecky, asserts that AmerenUE is accruing too much net salvage expense in these accounts and would establish an accrual offset of \$25 million to reduce the depreciation expense the company recognizes for these accounts.¹⁴⁹ Staff and AmerenUE oppose Selecky's proposal to establish an accrual offset.

Specific Findings of Fact:

45. The depreciation studies submitted by AmerenUE and Staff both calculated net salvage for these accounts using the accrual method that allows a utility to recover future net salvage over the life of plant through the use of current depreciation rates.¹⁵⁰ The Commission upheld the use of the accrual method in a 2005 decision involving Laclede Gas Company.¹⁵¹ Subsequently, the Commission upheld AmerenUE's use of the accrual method in AmerenUE's 2007 rate case.¹⁵²

¹⁴⁸ A list of the accounts included in Transmission and Distribution Plant may be found at Selecky Direct, Ex. 404 NP, Schedule JTS-8.

¹⁴⁹ Selecky Surrebuttal, Ex. 406, Page 16, Lines 1-7.

¹⁵⁰ Wiedmayer Rebuttal, Ex. 105, Page 49, Lines 15-18.

¹⁵¹ *In the Matter of Laclede Gas Company's Tariff to Revise Natural Gas Rate Schedules*, Third Report and Order, 13 Mo. P.S.C. 3d 215 (2005).

¹⁵² *In the Matter of Union Electric Company d/b/a AmerenUE's Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area*, Report and Order, Case No. ER-2007-0002, May 22, 2007, Page 92

46. Selecky does not oppose the continued use of the accrual method, but he contends AmerenUE is accruing what he describes as excessive amounts of net salvage expense that greatly exceed the level of net salvage expense the company actually incurs.¹⁵³ Indeed, AmerenUE's average actual annual net salvage expense over the last five years is \$15.1 million and over the last ten years, that average expense has been \$11.8 million.¹⁵⁴ Selecky contrasts those actual expenses with the \$55 million annual net salvage expense AmerenUE will accrue under the depreciation studies prepared by Staff and AmerenUE. Over the years, AmerenUE has accrued approximately \$582 million for future net salvage. This amount "seems excessive" to Selecky and he proposes a \$25 million offset to reduce that accrual.¹⁵⁵

47. The amount of Selecky's proposed offset is arbitrary. In his direct testimony, he proposed a \$35 million offset,¹⁵⁶ based on his calculation showing that AmerenUE's proposed depreciation expense would include \$76.1 million for annual net salvage.¹⁵⁷ After acknowledging a calculation error in his direct testimony, Selecky agreed that AmerenUE's proposed depreciation expense would be only \$55 million, a reduction of \$21 million.¹⁵⁸ However, he reduced his recommended offset by only \$10 million, to \$25 million.¹⁵⁹ In fact,

¹⁵³ Selecky Direct, Ex 404 NP, Page 25, Lines 21-23.

¹⁵⁴ Selecky Direct, Ex. 404 NP, Page 27, Lines 8-11.

¹⁵⁵ Selecky Surrebuttal, Ex. 406, Page 16, Lines 12-23.

¹⁵⁶ Selecky Direct, Ex. 404 NP, Page 31, Lines 8-9.

¹⁵⁷ Selecky Direct, Ex. 404 NP, Page 27, Lines 7-8.

¹⁵⁸ Selecky Surrebuttal, Ex. 406, Page 15, Lines 18-22.

¹⁵⁹ Selecky Surrebuttal, Ex. 406, Page 16, Lines 8-18.

Selecky acknowledged the arbitrariness of the amount of his proposed offset when he described it as just a number that he ran up the flagpole.¹⁶⁰

48. Although Selecky says he is not opposing the use of accrual accounting to calculate net salvage costs, his claim that an offset is needed is firmly based in the discredited method of expensing those costs that the Commission rejected in the *Laclede* decision.¹⁶¹ His claim that AmerenUE is accruing too much net salvage expense makes sense only if it is accepted that the company's net salvage collections should be limited to something approaching its actual current expenses. As the Commission has held on numerous occasions, expensing is not a reasonable way to calculate net salvage costs and would ensure that the company would under-recover its net salvage costs to the detriment of future generations of ratepayers who would have to pay a disproportionate share of unrecovered net salvage costs when the plant is actually retired.

49. The fact that AmerenUE is currently accruing more than its actual net salvage expense is reasonable and necessary because the transmission and distribution systems are continuously growing and because inflation will make future removal costs more expensive than the cost to remove plant in the past.¹⁶² The size of AmerenUE's system has nearly doubled in the last 50 years and the total distribution plant investment has increased by a factor of sixteen.¹⁶³ Current net salvage accruals are larger than current net salvage costs because AmerenUE is accruing dollars for a larger system than the system that

¹⁶⁰ Transcript, Page 1516, Lines 12-24.

¹⁶¹ *In the Matter of Laclede Gas Company's Tariff to Revise Natural Gas Rate Schedules*, Third Report and Order, 13 Mo. P.S.C. 3d 215 (2005).

¹⁶² Wiedmayer Rebuttal, Ex. 105, Page 69, Lines 9-12.

¹⁶³ Wiedmayer Rebuttal, Ex. 105, Page 69, Lines 16-18.

existed 40 or 50 years ago when the property currently being retired was added to the system. In addition, current accruals are for future net salvage costs and those future costs will be higher than current expenses due to the effect of inflation.¹⁶⁴ In fact, the theoretical reserve amount related to net salvage for transmission and distribution is \$720 million, and the company has thus far accrued only \$582 million for that purpose. Thus, far from over-accruing for net salvage, the company is behind in its recovery of net salvage.¹⁶⁵

Conclusions of Law:

There are no additional conclusions of law for this issue.

Decision:

Selecky's proposed allocation offset of \$25 million is arbitrary, is based on a expensing method the Commission has previously rejected, and is unnecessary and inappropriate. That proposed allocation offset is rejected and the net salvage rates proposed by AmerenUE for its Transmission and Distribution accounts are accepted.

3. Coal-Fired Plant Maintenance Expense

Findings of Fact:

Introduction:

1. AmerenUE spends a large sum of money each year to maintain its coal-fired electric generating fleet. During the test year, the twelve months ending March 31, 2009, the company spent \$118,967,000 for that purpose.¹⁶⁶ Part of that maintenance expense is *incurred for routine maintenance on the power plants, and part is associated with major*

¹⁶⁴ Wiedmayer Surrebuttal, Ex. 106, Page 19, Lines 4-13.

¹⁶⁵ Wiedmayer Surrebuttal, Ex. 106, Page 20, Lines 1-12.

¹⁶⁶ Meyer Direct, Ex. 400, Page 4, Chart at Line 9.

overhauls of the production plant that occur during scheduled outages.¹⁶⁷ AmerenUE contends future maintenance expenses will be at or near that test-year level and would use that amount to establish rates in this case.¹⁶⁸

2. Staff notes that the test-year maintenance expense was substantially higher than the expense for previous years, and, for that reason, proposes to normalize the test-year expense by averaging AmerenUE's maintenance expense over the last three years and using that amount to set rates.¹⁶⁹ Specifically, Staff averaged AmerenUE's non-labor maintenance costs for the 36 months ending at the true-up date, January 31, 2010, and subtracted that amount from the non-labor portion of AmerenUE's test-year maintenance expense, to arrive at a negative adjustment in the amount of \$14,939,835.¹⁷⁰ Thus, Staff would subtract \$14,939,835 from the test-year expense of \$118,967,000, to arrive at an expense level of \$104,027,165.

3. MIEC's witness, Greg Meyer, also proposed to normalize AmerenUE's maintenance expense, but he used a more complex method than that proposed by Staff. For each of AmerenUE's four coal-fired production plants Meyer calculated a base level of maintenance expense. That is, a level of maintenance expense that will be incurred each year regardless of whether that power plant undergoes the extra maintenance associated with a scheduled outage. As a second step, Meyer calculated the amount of expense associated with a scheduled outage at each power plant. He then averaged those scheduled outage expenses based on the anticipated number of years between scheduled outages to derive

¹⁶⁷ Transcript, Page 1075, Lines 11-21.

¹⁶⁸ Birk Rebuttal, Ex. 103, Page 17, Lines 3-8.

¹⁶⁹ Staff Report – Revenue Requirement/Cost of Service, Ex. 200, Page 93, Lines 6-14.

¹⁷⁰ Grissum True-Up, Ex. 242, Page 2, Lines 1-11.

an estimate of the annual expense associated with scheduled outages. He added the base level of maintenance expense to the annual expense associated with scheduled outages to arrive at a total annual steam production maintenance expense of \$104.6 million.¹⁷¹ Meyer then rounded that number up and recommended \$105 million as a normalized level of expense for purposes of establishing rates.

Specific Findings of Fact:

4. Undeniably, AmerenUE's test-year coal plant maintenance expenses of \$119 million were significantly higher than they had been in previous years. In the 12 months ending March 31, 2006, those expenses totaled \$88.9 million, for the same period ending March 31, 2007, they totaled \$93.4 million, and for the twelve-month period ending March 31, 2008, they totaled \$91 million.¹⁷² Furthermore, the level of expenses can vary from year to year depending upon how many scheduled outages are planned for that year. That situation requires the Commission to consider whether the test year expense is truly representative of the level of expense the company is likely to experience while the rates established in this case are in effect.

5. AmerenUE offered two reasons why the test-year level of expense is representative of future expense levels. First, in 2003, AmerenUE decided to approximately double the length of scheduled maintenance outage cycles for its coal-fired power plants. As a consequence, AmerenUE undertook fewer scheduled maintenance outages for those plants in the years immediately following 2003. The scheduled outages that would have been undertaken in those years were instead pushed back into later years, with the

¹⁷¹ Meyer Surrebuttal, Ex. 402 NP, Pages 4-7.

¹⁷² Meyer Direct, Ex. 400, Page 4, Chart at Line 9.

attendant costs also being pushed back.¹⁷³ A calculation of actual scheduled outages during the periods of 2001 – 2004 and 2005-2008, and planned outages for 2010 and 2011, was received in camera during the hearing.¹⁷⁴ Those numbers are considered highly confidential so they will not be stated in this order, but they confirm that the number of scheduled outages decreased during the period 2005 to 2008, and that the number of scheduled outages in 2010 and 2011 was expected to return to the level seen in 2001 to 2004.

6. Second, AmerenUE contends the test-year level of expense is representative of future expense levels because of the effects of the global financial crises of 2009. AmerenUE was concerned that it would not be able to obtain the financing needed to perform the maintenance work associated with scheduled outages, and therefore deferred the scheduled outages planned for 2009 into 2010.¹⁷⁵ That deferral has the effect of increasing the level of scheduled outage expense AmerenUE will incur in the future.

7. The Commission traditionally determines a representative future level of expense by looking at numbers in a historic test year. The goal is to establish rates that will give a utility a reasonable opportunity to recover its prudent costs during the period when the rates are in effect. The presumption is that test year expenses will be the best measure of future expenses. However, that presumption is not always correct and it may be appropriate to normalize certain expenses if it appears that a normalized level of expense will be more representative of future expenses.

¹⁷³ Birk Rebuttal, Ex. 103, Page 14, Lines 1-23.

¹⁷⁴ Transcript, Pages 1132-1133, Lines 11-25, 1-9. *See also*, Ex. 162 HC.

¹⁷⁵ Transcript, Page 1049, Lines 6-16.

8. It is, however, inappropriate to blindly “normalize” a test year expense by calculating an average expense from years of lower expense without considering whether the resulting expense level is truly representative of likely future costs. Yet, Staff never looked at the history of scheduled outages to consider whether the period it used to normalize maintenance expense was likely to be representative of future expenses.¹⁷⁶ In fact, Staff’s witness testified she ignored everything except the historical numbers.¹⁷⁷ Therefore, Staff’s purported normalization is unreliable.

9. MIEC’s proposed normalization is more carefully thought out to give appropriate consideration to whether the normalized expense level will be representative of future costs. It does that by taking into account the scheduled outages for each of the power plants and recognizing the effect those scheduled outages will have on the expenses the company will incur.

10. AmerenUE criticizes MIEC’s proposed normalization on two bases. First, it contends MIEC’s normalization uses expenses from five or six years ago that have not been adjusted to recognize the effect of inflation.¹⁷⁸ However, the Commission finds that MIEC’s numbers do not have to be adjusted for inflation because the base line for maintenance expense, excluding scheduled outage expense, remained essentially flat between 2005 and 2007, indicating that despite inflation, other techniques, technologies, or cost of materials have decreased enough to offset the cost of inflation.¹⁷⁹

¹⁷⁶ Transcript, Page 1190, Lines 8-16.

¹⁷⁷ Transcript, Page 1212, Lines 9-21.

¹⁷⁸ Birk Supplemental Testimony, Ex. 158, Page 3, Lines 17-19.

¹⁷⁹ Transcript, Pages 1144-1145, Lines 9-25, 1-19.

11. AmerenUE's second criticism of MIEC's normalization is that it fails to take into account the reduced number of scheduled outages that occurred during the period it used to normalize the maintenance expenses. That criticism is valid, but can be avoided if Meyer's normalization technique is applied to the actual outages planned for the period when the rates established in this case will be in effect.

12. AmerenUE anticipates filing its next rate case sometime before the end of 2010, meaning the rates established in this case will likely remain in effect for only about 18 months.¹⁸⁰ During an in camera cross examination of Mr. Birk, MIEC elicited testimony that took Meyer's estimation of a base level of annual maintenance expense and added his estimation of the expense associated with each scheduled outage AmerenUE plans to undertake in 2010.¹⁸¹ That calculation resulted in an estimated expense for 2010 of \$110.2 million.¹⁸²

13. MIEC offered that number to show that Meyer's normalization method would result in an estimate relatively close to the amount AmerenUE has budgeted for maintenance expense in 2010. However, using that number, which is based on the scheduled outages actually planned for 2010, as the basis for establishing rates also eliminates AmerenUE's criticism that the normalization fails to take into account the increasing number of scheduled outages that will occur while the rates established in this case are in effect. Therefore, the Commission finds that \$110.2 million is a reasonable normalization of AmerenUE's coal-plant maintenance expense.

¹⁸⁰ Transcript, Page 1098, Lines 7-12.

¹⁸¹ Transcript, Pages 1009-1013. See also Ex. 443.

¹⁸² Ex. 443 HC.

Conclusions of Law:

A. In a 1984 case addressing a Commission rate case decision, the Missouri Court of Appeals described the concept of normalization of a test-year expense as follows:

The test year is a period past, but is employed as a vehicle upon which to project experience in a future period when the rates determined in the case will be in effect. Normalization of a test year cost by multi-year averaging of the cost based on experience assumes that the cost rises and falls, with the consequence that the actual cost incurred in the test year is not representative.¹⁸³

That means that in normalizing a test year expense, the Commission is attempting to establish rates that will allow the utility a reasonable opportunity to recover its anticipated expenses. For that reason, the Commission must consider whether a proposed normalized test year expense is reasonably related to anticipated future expenses.

Decision:

The Commission concludes that \$110.2 million is a reasonable normalization of AmerenUE's annual coal-plant maintenance expense.

4. Nuclear Fuel Expense

Findings of Fact:

Introduction:

1. AmerenUE's Callaway nuclear plant is refueled every 18 months. During each refueling, about half of the uranium fuel assemblies in the reactor core are removed and replaced with new assemblies.¹⁸⁴ AmerenUE refueled the Callaway plant beginning in April

¹⁸³ *State ex rel. Missouri Power and Light Co. v. Public Service Com'n*, 669 S.W.2d 941, 945, (Mo App. W.D. 1984).

¹⁸⁴ Irwin Rebuttal, Ex. 127, Page 3, Lines 13-15.

2010, with fuel assemblies purchased and delivered to the plant before January 31, 2010.¹⁸⁵

2. AmerenUE would include the increased cost of the fuel assemblies installed during the April 2010 refueling in the average nuclear fuel cost to be recovered in base rates resulting from this case.¹⁸⁶ Staff, supported by MIEC, would base AmerenUE's nuclear fuel cost on its average cost for fuel actually burned during the fifteen-month period beginning October 2008 and continuing through January 31, 2010, the true-up cut off date established for this case.¹⁸⁷ Under Staff and MIEC's proposal, AmerenUE would not be allowed to recover the increased cost of the nuclear fuel loaded into the Callaway plant in April 2010. The difference between the proposals amounts to approximately \$11 million.¹⁸⁸

Specific Findings of Fact:

3. The facts surrounding this issue are not in dispute. AmerenUE has bought and paid for nuclear fuel assemblies to refuel the Callaway nuclear power plant beginning in April 2010. Those assemblies are highly engineered and specifically designed for use at Callaway.¹⁸⁹ The Callaway plant must be shut down to be refueled and a shut-down is costly, so AmerenUE must purchase those fuel assemblies and have them available on-site well in advance of the shut-down.¹⁹⁰

4. The nuclear fuel assemblies are accounted for as construction work in progress until they are fully assembled; once assembled they are accounted as nuclear fuel assembly

¹⁸⁵ Irwin Rebuttal, Ex. 127, Page 4, Lines 2-5.

¹⁸⁶ Finnell Direct, Ex. 130, Page 9, Lines 5-7.

¹⁸⁷ Grissum Surrebuttal, Ex. 224, Page 2, Lines 9-12. See also, Transcript, Page 2657, Lines 6-14.

¹⁸⁸ Revised True-Up Reconciliation, Ex. 242.

¹⁸⁹ Irwin Rebuttal, Ex. 127, Page 4, Lines 20-22.

¹⁹⁰ Transcript, Pages 2665-2666, Lines 21-25, 1-7.

stock. The fuel assemblies were completed and accounted for as stock in October 2009.¹⁹¹ When burned in the reactor, the assemblies are expensed as fuel expense.¹⁹² During the time after the fuel assemblies are completed, until the time they are loaded and burned in the reactor, the company receives no carrying costs on those fuel assemblies.¹⁹³

5. The nuclear fuel price is based on the amortization of the initial costs of the fuel assemblies. As such, the nuclear fuel price AmerenUE proposes to include in rates in this case has not and will not occur until the new fuel assemblies have been loaded into the Callaway reactor during refueling and the Callaway unit is placed back in-service sometime in June 2010.¹⁹⁴ This will be approximately four months after the January 31, 2010 true-up date.

6. If AmerenUE's increased nuclear fuel costs are not included in base rates, the company will be able to recover those costs through the operation of its fuel-adjustment clause, subject to the 95/5 sharing mechanism included in that fuel adjustment clause.¹⁹⁵ Because of the way the fuel adjustment clause works, AmerenUE would not be able to fully recover its 95 percent share of those increased costs until September 30, 2011.¹⁹⁶

7. In AmerenUE's last rate case, ER-2008-0318, AmerenUE was allowed to recover the increased cost of nuclear fuel associated with a refueling that occurred approximately

¹⁹¹ Transcript, Page 2665, Lines 12-15.

¹⁹² Transcript, Page 2664, Lines 12-20.

¹⁹³ Transcript, Page 2665, Lines 16-20.

¹⁹⁴ Grissum Surrebuttal, Ex. 224, Page 3, Lines 17-22.

¹⁹⁵ Transcript, Page 2660, Lines 4-25.

¹⁹⁶ Transcript, Pages 2661-2662, Lines 1-25, 1-7.

one month after the true-up cut off date for that case. No party in that case objected to AmerenUE's recovery of those costs.¹⁹⁷

Conclusions of Law:

A. The disagreement between the parties concerns the application of the true-up cut-off date. The Commission employs a test-year concept to evaluate a utility's income and expenses for the purpose of setting just and reasonable rates. For this case, the test year was established as the twelve-month period ending March 31, 2009, with an additional true-up period extending through January 31, 2010. That means that for that test-year period, extended through the true-up, the Commission has examined the company's income and expenses to determine the amount of revenue the company should be allowed to generate through the rates to be established as a result of this case. The goal is to match income and expenses over the same period so that a true level of required revenue can be determined.

B. The increased cost of the fuel assemblies loaded into the Callaway reactor during the April shut-down will not begin to be expensed until the reactor is back in operation, and thus will fall outside the test-year and the true-up period. In most situations, the Commission will not allow for out-of-period adjustments because to do so risks upsetting the matching principle. That is, reaching outside the test year to pull in an expense could allow the company to recover excess revenue if that out-of-test-year expense would otherwise have been offset by some unconsidered item of out-of-test-year income.

C. However, the matching principle is not an absolute bar to an appropriate out-of-period adjustment. When faced with this question in the past, the Commission has said

¹⁹⁷ Transcript, Pages 2658-2659, Lines 21-25, 1-6.

“when such known and measurable increases in expenses occur it is more equitable to allow such an expense to be reflected in the revenue requirement than to disallow it for the sole reason that corresponding revenues may be lacking.”¹⁹⁸ On that basis, the Commission has, for example, allowed a company to recover for a known postage rate increase that would occur outside the test year,¹⁹⁹ and a known wage increase and FICA withholding tax increase, again outside the test year.²⁰⁰

D. In this case, AmerenUE’s cost to purchase the fuel assemblies is absolutely known and measurable, and has been known and measurable since October 2009. The fuel assemblies are presumably now in place and will be generating electricity at the time rates resulting from this case go into effect. Ultimately, AmerenUE would recover 95 percent of its increased nuclear fuel costs through operation of its fuel adjustment clause, but it would have to wait many months to fully recover those costs.

E. The matching principle is important, but the ultimate purpose of a test year is to establish rates that will give a utility a reasonable opportunity to recover its prudent costs during the period when the rates are in effect. Allowing AmerenUE to recover its increased fuel costs in its base rates is necessary to allow the company a reasonable opportunity to recover its prudent costs.

¹⁹⁸ *In the Matter of St. Louis County Water Company, St. Louis, Missouri, for Authority to File Tariffs to Increase Water Service Provided to Customers in the Missouri Service Area of the Company*, Report and Order, 29 Mo. P.S.C. (N.S.) 425, 435 (1988).

¹⁹⁹ *Id.*

²⁰⁰ *In the Matter of Citizens Electric Corporation of Ste. Genevieve, Missouri, for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Missouri Service Area of the Company*, Report and Order, 24 Mo. P.S.C. (N.S.) 450, 457 (1981).

Decision:

AmerenUE shall recover its increased nuclear fuel costs associated with the April 2010 refueling of the Callaway nuclear plant as part of its base fuel costs. The adjustments proposed by Staff and MIEC that would deny that recovery are rejected.

5. Vegetation Management and Infrastructure Inspection Expense

Findings of Fact:

Introduction:

1. AmerenUE's vegetation management and infrastructure inspection expense is closely associated with two Commission rules. Following extensive storm related service outages in 2006, the Commission promulgated new rules designed to compel Missouri's electric utilities to do a better job of maintaining their electric distribution systems. Those rules, entitled Electrical Corporation Infrastructure Standards²⁰¹ and Electrical Corporation Vegetation Management Standards and Reporting Requirements,²⁰² became effective on June 30, 2008.

2. The rules establish specific standards requiring electric utilities to inspect and replace old and damaged infrastructure, such as poles and transformers. In addition, electric utilities are required to more aggressively trim tree branches and other vegetation that encroaches on transmission lines. In promulgating the stricter standards, the Commission anticipated utilities would have to spend more money to comply. Therefore, both rules include provisions that allow a utility the means to recover the extra costs it incurs to comply with the requirements of the rule.

²⁰¹ Commission Rule 4 CSR 240-23.020.

²⁰² Commission Rule 4 CSR 240-23.030.

3. In ER-2008-0318, the Commission allowed AmerenUE to recover \$54.1 million in its base rates for vegetation management costs, and \$10.7 million for infrastructure inspection costs. However, since the rules were new, the Commission found that AmerenUE had too little experience to reasonably know how much it would need to spend to comply with the vegetation management and infrastructure inspection rules. Because of that uncertainty, the Commission established a two-way tracking mechanism to allow AmerenUE to track its vegetation management and infrastructure costs.

4. The base level for that tracker was set at \$64.8 million (\$54.1 million for vegetation management plus \$10.7 million for infrastructure inspection). The order required AmerenUE to track actual expenditures around that base level. In any year in which AmerenUE spent below that base level, a regulatory liability would be created. In any year in which AmerenUE's spending exceeded the base level, a regulatory asset would be created. The regulatory assets and liabilities would then be netted against each other and would be considered in AmerenUE's next rate case. The tracking mechanism contained a 10 percent cap so if AmerenUE's expenditures exceeded the base level by more than 10 percent it could not defer those costs under the tracking mechanism, but would need to apply for an additional accounting authority order. The Commission's order indicated that the tracking mechanism would operate until new rates were established in AmerenUE's next rate case.²⁰³

5. This is, of course, the next rate case, and AmerenUE asks that the tracker be continued. Staff, MIEC, and Public Counsel contend the Commission should eliminate the

²⁰³ *In the Matter of Union Electric Company, d/b/a AmerenUE's Tariffs to Increase its Annual Revenues for Electric Service, Report and Order, Case No. ER-2008-0318, January 27, 2009, Pages 48-49.*

tracker and establish an allowance for vegetation management and infrastructure inspection expenses based on the company's expenditures during the test year.

Specific Findings of Fact:

6. The Commission must resolve two issues regarding these vegetation management and infrastructure expenses. First, the Commission must decide whether the existing tracker should be continued.

7. The Commission approved a tracker in the last rate case because the vegetation management and infrastructure rules were still very new. As a result, no one knew with any certainty how much AmerenUE would need to spend to comply with the rules' provisions.²⁰⁴ AmerenUE has now been operating under those rules for two years. Although the rule went into effect on June 30, 2008, AmerenUE began complying with the requirements of the rules on January 1, 2008.²⁰⁵

8. Staff and MIEC contend that experience is sufficient to allow the Commission to confidently set AmerenUE's rates without renewing the tracker. However, the new rules impose substantial new requirements for tree trimming²⁰⁶ and infrastructure inspections. AmerenUE has not yet completed a full four/six year vegetation management cycle on its entire system. Over half of its circuits have not yet been trimmed to the new standards. That is important because every circuit is unique, with different amounts of vegetation that must be trimmed, and requires a different amount of work to meet the standards imposed

²⁰⁴ *In the Matter of Union Electric Company, d/b/a AmerenUE's Tariffs to Increase its Annual Revenues for Electric Service*, Report and Order, Case No. ER-2008-0318, January 27, 2009, Page 41.

²⁰⁵ Meyer Rebuttal, Ex. 402NP, Page 11, Line 13.

²⁰⁶ Transcript, Page 1759, Lines 8-13.

by the rules.²⁰⁷ Therefore, it is still difficult to predict what AmerenUE's normal level of vegetation management expenses will be.²⁰⁸ The same is true for AmerenUE's efforts to comply with the infrastructure inspection rule.²⁰⁹

9. As the Commission said in the last rate case, the tracker serves to protect both the company and its ratepayers during this initial period of uncertainty about the cost to comply with the new rules. If the company spends less than the base level set in the tracker, the excess allowance will be tracked and returned to ratepayers in the next rate case. That is exactly what has happened in this case, and thus, ratepayers have already benefited from the existence of the tracker.

10. AmerenUE's system reliability has improved since the new rules went into effect,²¹⁰ and the Commission believes that vegetation management and infrastructure inspection is very important to that improved reliability. The Commission wants to encourage AmerenUE to continue to spend the money needed to improve reliability. Because there is still a great deal of uncertainty about the amount of spending needed to comply with the rules, the Commission finds that the tracker is still needed. That does not mean the tracker will become permanent. AmerenUE's witness suggests the company will have a level of experience needed to better predict costs in two to four years.²¹¹ It may not take that long, and the Commission will certainly revisit this issue in AmerenUE's next rate case, but for this case, the Commission will renew the existing vegetation management and infrastructure inspection tracker.

²⁰⁷ Wakeman Rebuttal, Ex. 109, Page 8, Lines 7-8.

²⁰⁸ Wakeman Rebuttal, Ex. 109, Page 7, Lines 1-23.

²⁰⁹ Wakeman Rebuttal, Ex. 109, Pages 8-9, Lines 16-23, 1-11.

²¹⁰ Zdellar Direct, Ex. 157, Pages 3-15.

²¹¹ Wakeman Rebuttal, Ex. 109, Page 7, Lines 20-21.

11. Having renewed the tracker, the Commission must decide the dollar amount to be included as a base level for that tracker. AmerenUE spent \$50.4 million on vegetation management in the twelve-month period ending at the true-up date, January 31, 2010.²¹² For the same period, AmerenUE spent \$7.6 million on infrastructure inspection expenses.²¹³ That is a total of \$58 million. The non-AmerenUE parties would use those actual expenditures to establish AmerenUE's rates for this case.

12. AmerenUE contends its forecasted expenditures for 2010 and 2011 should be used to set its new rates. The average forecasted expenditures for those two years are \$53.7 million for vegetation management and \$8.9 million for infrastructure inspections, for a total of \$62.6 million.²¹⁴ AmerenUE would use that amount as the base level for a renewed two-way tracker.

13. In general, the Commission prefers to use historical information rather than forecasts to establish rates. In the last rate case, the Commission used the company's forecasted budget amounts to set the base level of the tracker. It did so because at that time there was very little historical information upon which to base its decision. More information is available now and while there is still enough uncertainty to justify the continuation of the tracker, the additional historical information is sufficient to set a reasonable base level for that tracker. Therefore, the Commission will set the base level of the tracker at \$58 million,

14. One other matter remains to be resolved. Through February 28, 2010, AmerenUE has collected approximately \$5 million more than it actually incurred to comply with the

²¹² Meyer Rebuttal, Ex. 402NP, Page 10, Lines 7-10.

²¹³ Meyer Rebuttal, Ex. 402NP, Page 14, Lines 1-5.

²¹⁴ Wakeman Rebuttal, Ex. 109, Page 10, Lines 14-20.

Commission's vegetation management and infrastructure inspection rules.²¹⁵ Staff proposed to reduce that over-collection by \$2 million, which is the amount the company incurred from October 1, 2008 through February 28, 2009, in excess of the amount included in rates.²¹⁶ That would indicate a remaining over-collection of \$3 million, but Staff updated that number at the end of the hearing to \$3.4 million.²¹⁷

15. Staff recommends that the \$3.4 million remain in the tracker as an addition or offset to any future amounts deferred. The Commission would then address ultimate disposition of any amounts deferred in the next rate case.²¹⁸ AmerenUE did not offer a proposal on how the \$3.4 million over-collection should be returned to its customers until its initial brief. At that time, the company recommended that the over-collection be returned to customers, amortized over three years.²¹⁹

16. Staff's proposal would potentially offset an increase in AmerenUE's expenses for the next rate case and thereby decrease any rate increase that would result from that future case. AmerenUE's proposal has the advantage of decreasing the rate increase that will result from this decision. The Commission will accept AmerenUE's proposal and directs that the \$3.4 million over collection be returned to customers, amortized over three years.

²¹⁵ Rackers Surrebuttal, Ex. 203, Page 4, Lines 11-12.

²¹⁶ Rackers Surrebuttal, Ex. 203, Page 4, Lines 19-21. In ER-2008-0318, the Commission allowed AmerenUE to accumulate and defer those expenses in an Accounting Authority Order for consideration in this rate case.

²¹⁷ Exhibit 240.

²¹⁸ Rackers Surrebuttal, Ex 203, Page 5, Lines 4-9.

²¹⁹ Post-Hearing Brief of AmerenUE, Pages 119-120.

Conclusions of Law:

A. Commission Rule 4 CSR 240-23.020 establishes standards requiring electrical corporations, including AmerenUE, to inspect its transmission and distribution facilities as necessary to provide safe and adequate service to its customers. Specifically, 4 CSR 240-23.020(3)(A) establishes a four-year cycle for inspection of urban infrastructure and a six-year cycle for inspection of rural infrastructure.

B. Commission Rule 4 CSR 240-23.020(4) establishes a procedure by which an electric utility may recover expenses it incurs because of the rule. Specifically, that section states as follows:

In the event an electrical corporation incurs expenses as a result of this rule in excess of the costs included in current rates, the corporation may submit a request to the commission for accounting authorization to defer recognition and possible recovery of these excess expenses until the effective date of rates resulting from its next general rate case, filed after the effective date of this rule, using a tracking mechanism to record the difference between the actually incurred expenses as a result of this rule and the amount included in the corporation's rates

C. Commission Rule 4 CSR 240-23.030 establishes standards requiring electrical corporations, including AmerenUE, to trim trees and otherwise manage the growth of vegetation around its transmission and distribution facilities as necessary to provide safe and adequate service to its customers. Specifically, 4 CSR 240-23.030(9) establishes a four-year cycle for vegetation management of urban infrastructure and a six-year cycle for vegetation management of rural infrastructure. The vegetation management rule also includes a provision that would allow AmerenUE to ask the Commission for authority to accumulate and recover its cost

of compliance in its next rate case.²²⁰

Decision:

AmerenUE shall establish a tracking mechanism to track future vegetation management and infrastructure costs. That tracking mechanism shall include a base level of \$58 million (\$50.4 million + \$7.6 million = \$58 million). Actual expenditures shall be tracked around that base level with the creation of a regulatory liability in any year where AmerenUE spends less than the base amount and a regulatory asset in any year where AmerenUE spends more than the base amount. The assets and liabilities shall be netted against each other and shall be considered in AmerenUE's next rate case. The tracking mechanism shall contain a ten percent cap so expenditures exceeding the base level by more than ten percent shall not be deferred under the tracking mechanism. If AmerenUE's vegetation management and infrastructure inspection costs exceed the ten percent cap, it may request additional accounting authority from the Commission in a separate proceeding. The tracking mechanism shall operate until new rates are established in AmerenUE's next rate case.

The \$3.4 million AmerenUE over-collected from its ratepayers under its previous tracking mechanism shall be returned to its ratepayers, amortized over three years.

6. Storm Restoration

Findings of Fact:

Introduction:

1. AmerenUE must spend money each year to restore electric service after its electric system suffers damage as the result of storms. Each year some of that damage results

²²⁰ Commission Rule 4 CSR 240-23.030(10).

from normal, routine storms. But occasionally, the electric system is struck by a truly extraordinary storm that can greatly increase restoration costs.

2. The Commission has generally allowed an electric utility to recover the Operations and Maintenance (O&M), excluding internal labor, costs to restore service after normal storms by including an amount in the cost of service based on some multiyear average level.²²¹ For the costs to restore service after an extraordinary storm, the Commission has usually allowed the utility to accumulate and defer those costs through an accounting authority order, an AAO.²²² The accumulated and deferred costs are then considered in the utility's next rate case. Generally, the Commission allows the utility to recover those costs amortized over a five-year period.²²³

3. Staff would use that same procedure in this case. Staff proposes to use a four-year average of AmerenUE's normal O&M, non-labor related, storm restoration costs to allow \$6.4 million in AmerenUE's cost of service for normal storm restoration costs. AmerenUE's actual storm restoration cost during the test year totaled \$10.4 million. Staff would remove \$4 million from that amount as related to extraordinary storms, and allow AmerenUE to recover that \$4 million amortized over five years.²²⁴ MIEC's witness, Greg Meyer advocates the same approach, although he would allow only \$5.2 million in AmerenUE's

²²¹ A utility may also incur substantial capital investment costs to replace things like power poles after a storm. Those investment costs are added to the company's rate base and recovered in that manner. This issue does not concern those capital costs.

²²² Rackers Rebuttal, Ex. 202, Page 2, Lines 21-24.

²²³ Rackers Rebuttal, Ex. 202, Page 2, Lines 5-11.

²²⁴ Staff Report – Revenue Requirement/Cost of Service, Ex. 200, Pages 89-90, Lines 25-29, 1-16.

cost of service, as that was the amount allowed in the company's previous rate case, ER-2008-0318.²²⁵

4. AmerenUE proposes to use a new approach to the recovery of storm restoration expenses. It would have the Commission set the base level of storm restoration O&M costs at the actual amount incurred during the test year, which is \$10.4 million. AmerenUE then proposes that the Commission establish a tracking mechanism to track actual expenses against that base level. If AmerenUE spent less than the base level, the difference could be returned to rate payers in the next rate case. If expenses exceeded the base level, AmerenUE could seek to recover the difference in its next rate case.²²⁶

Specific Findings of Fact:

5. The O&M non-labor cost AmerenUE incurs can vary greatly from year to year depending upon whether the electric system is struck by a major storm. For 2004 and 2005, those costs were only \$1 million and \$2 million respectively. For 2006 and 2007, the costs jumped to \$26 million and \$33 million. For 2008 and 2009, they fell again to \$4 million and \$9 million.²²⁷ Under the approach the Commission has used in past cases, the company may under recover in years when costs are high, but may over recover in years when costs are low. If the company incurs truly extraordinary storm restoration costs in a particular year, it is able to recover those costs through the accounting authority mechanism. In this case, AmerenUE is recovering amortized storm restoration costs from five different storm events.²²⁸

²²⁵ Meyer Direct, Ex. 400, Pages 27-28, Lines 17-23, 1-2.

²²⁶ Zdellar Direct, Ex. 157, Page 21, Lines 1-12.

²²⁷ Rackers Surrebuttal, Ex. 203, Page 6, Chart at Line 6.

²²⁸ Staff Report – Revenue Requirement/Cost of Service, Ex 200, Pages 90-91.

6. No party disputes that AmerenUE has provided good storm restoration service in recent years, and no one has alleged that any of its storm restoration expenses have been imprudent.

7. The Commission is unwilling to implement another tracker. As the Commission has previously indicated, trackers should be used sparingly because they tend to limit a utility's incentive to prudently manage its costs. If all such costs can simply be passed on to ratepayers, there is a natural incentive for the company to simply incur the cost. If the company must consider whether it will be able to recover a cost, it is more likely to think before it spends and maximize any possible cost savings.

8. The storm cost recovery method the Commission has used in the past has worked reasonably well. The company will ultimately recover its extraordinary costs resulting from unpredictable extraordinary storms through the accounting authority order mechanism, but the company still has a strong incentive to minimize its costs. Staff's proposal to include the four-year average of \$6.4 million for storm restoration costs, while amortizing the extra \$4 million in test year expense over five years is reasonable. MIEC's alternative proposal to include only \$5.2 million in the company's cost of service is based only on the amount allowed in the last rate case. As such it is arbitrary and unsupported by any evidence offered in this case.

Conclusions of Law:

There are no additional conclusions of law for this issue.

Decision:

AmerenUE's request to establish a tracking mechanism is denied. AmerenUE shall include \$6.4 million in its cost of service for storm restoration costs. The remaining \$4

million in test year storm restoration expense shall be amortized and recovered over five years.

7. Union Issues

Findings of Fact:

Introduction:

1. The various unions that represent AmerenUE's employees appeared at the hearing to support the company's request for a rate increase. However, they asked the Commission to order AmerenUE to spend more money on employee training and to take specific steps to increase its internal workforce so that it will use fewer outside contractors. AmerenUE contends it is currently providing safe and adequate service and argues the Commission has no authority to manage the day-to-day affairs of the company.

Findings of Fact:

2. Michael Walter is the Business Manager of International Brotherhood of Electrical Workers Local 1439, AFL-CIO.²²⁹ He testified that AmerenUE has not spent enough on training new workers and as a result has over-relied on outside contractors to perform normal and sustained work.²³⁰ In particular, Walter is concerned that AmerenUE's trained work force is aging and he sees a need for increased training of new workers capable of stepping in when the current workforce retires.²³¹ He asks the Commission to require AmerenUE to spend a portion of its rate increase to improve training and increase the portion of the workload performed by its internal workforce.²³² AmerenUE's witness replied

²²⁹ Walter Rebuttal, Ex. 650, Page 1, Lines 2-3.

²³⁰ Walter Rebuttal, Ex. 650, Pages 2-7.

²³¹ Transcript, Page 2575, Lines 18-24.

²³² Walter Rebuttal, Ex.650, Pages 7-9.

that the company must rely on outside contractors to meet some of its normal workforce needs because of a shortage of qualified personnel.²³³

3. In response to those concerns, Commissioners Davis and Jarrett asked the AmerenUE witnesses how the company would spend extra money to training power plant operators if provided additional training funds as a result of this case.²³⁴ In response to Commissioners Davis' and Jarrett's questions, AmerenUE filed an exhibit detailing how it would spend extra money on training. AmerenUE also agreed to assess the incremental value to customers of its additional training investments and to present those findings to Staff and Public Counsel by December 31, 2011.²³⁵ AmerenUE's witness explained that these additional funds would be used to train AmerenUE's distribution employees.²³⁶

4. The Commission finds that the evidence presented by the union witnesses does not demonstrate that AmerenUE has failed to supply safe and adequate service to the public. Furthermore, for reasons fully explained in its Conclusions of Law, the Commission does not have the authority to dictate the manner in which AmerenUE conducts its business. Therefore, the Commission will not attempt to dictate to the company regarding its use of outside contractors.

5. However, the union witnesses and AmerenUE agree that there is a need for improved training to replace skilled workers nearing retirement age. It takes five to seven

²³³ Wakeman Surrebuttal, Ex. 110, Page 10, Lines 5-15.

²³⁴ Transcript, Page 2619, Lines 3-20, and Page 2621, Lines 5-9. The Commission allocated extra money for additional training in AmerenUE's last rate case, ER-2008-0318. AmerenUE explained how that money was spent in the direct testimony of Mark Birk, Ex. 102, Pages 15-16.

²³⁵ Ex. 179.

²³⁶ Transcript, Page 2783, Lines 21-24.

years of training to replace a skilled electrical worker.²³⁷ For several job classifications, many workers are nearing retirement age and will soon be leaving the company.²³⁸ Thus, the Commission finds that there is a need for additional training to attempt to meet that need.

6. Therefore, the Commission will add \$1.29 million to AmerenUE's cost of service to fund increased training staff. The Commission will also allow AmerenUE \$2.1 million for additional training equipment and materials, to be amortized over five years and recovered in rates. That would increase AmerenUE's cost of service by an additional \$420,000 per year, for a total annual increase of \$1,710,000.

Conclusions of Law:

A. The Commission has the authority to regulate AmerenUE, including the authority to ensure that the utility provides safe and adequate service. However, the Commission does not have authority to manage the company. In the words of the Missouri Court of Appeals,

The powers of regulation delegated to the Commission are comprehensive and extend to every conceivable source of corporate malfeasance. Those powers do not, however, clothe the Commission with the general power of management incident to ownership. The utility retains the lawful right to manage its own affairs and conduct its business as it may choose, as long as it performs its legal duty, complies with lawful regulation,²³⁹ and does no harm to public welfare.

Therefore, the Commission does not have the authority to dictate to the company whether it must use internal workforce rather than outside contractors to perform the work of the company.

Decision:

²³⁷ Transcript, Page 2576, Lines 21-25.

²³⁸ Transcript, Page 2593, Lines 4-9.

²³⁹ *State ex rel. Harline v. Public Serv. Com'n*, 343 S.W.2d 177, 182 (Mo. App. 1960)

The evidence presented by the union witnesses does not demonstrate that AmerenUE has failed to provide safe and adequate service and the Commission will not dictate to the company whether it must use its internal workforce or outside contractors to perform the company's work. However, the Commission will add \$1,290,000 to AmerenUE's cost of service to fund increased training staff. The Commission will also allow AmerenUE \$2,100,000 for additional training equipment and materials, to be amortized over five years and recovered in rates. That increases AmerenUE's cost of service by \$1,710,000 per year. AmerenUE shall assess the incremental value to customers of these additional investments and provide that assessment to Staff and Public Counsel by December 31, 2011.

8. Fuel Adjustment Clause

Findings of Fact:

Introduction:

1. In AmerenUE's last rate case, ER-2008-0318, the Commission allowed AmerenUE to implement a fuel adjustment clause.²⁴⁰ The approved fuel adjustment clause includes an incentive mechanism that requires AmerenUE to pass through to its customers 95 percent of any deviation in fuel and purchased power costs from the base level. The other 5 percent of any deviation is retained or absorbed by AmerenUE.²⁴¹
2. In the direct testimony of its witness, Lynn Barnes, AmerenUE proposed that its existing fuel adjustment clause be continued, with a few minor refinements.²⁴² When it filed

²⁴⁰ *In the Matter of Union Electric Company, d/b/a AmerenUE's Tariffs to Increase its Annual Revenues for Electric Service*, Report and Order, Case No. ER-2008-0318, January 27, 2009, Pages 69-70.

²⁴¹ *Id.* at Page 76.

²⁴² Barnes Direct, Ex. 121, Page 3, Lines 2-10.

its direct testimony, Staff agreed that AmerenUE's existing fuel adjustment clause should be continued with the refinements proposed by AmerenUE and some additional modifications proposed by Staff.²⁴³ The minor modifications to the fuel adjustment clause were resolved in the First Stipulation and Agreement that the Commission approved on March 24, 2010. Therefore, the Commission will not further address those modifications.

3. In an order issued on February 17, 2010, after the parties had filed rebuttal testimony, the Commission indicated it wanted to hear more evidence from the parties about the continued appropriateness of the 95 percent pass-through mechanism in AmerenUE's current fuel adjustment clause. To that end, the Commission offered the parties an opportunity to file additional direct, rebuttal, and surrebuttal testimony on an expedited schedule before the start of the hearing.²⁴⁴

4. AmerenUE responded by filing extensive additional testimony explaining why the company still needs a fuel adjustment clause that incorporates the current sharing mechanism. MIEC, Public Counsel, and Staff also filed additional testimony regarding the fuel adjustment clause.

5. MIEC refiled the testimony that its witness, Maurice Brubaker, offered regarding the fuel adjustment clause in AmerenUE's last rate case.²⁴⁵ In that testimony, Brubaker advised the Commission to implement an 80/20 sharing mechanism that would allow the company to pass-through to customers only 80 percent of the changes in fuel cost and off-

²⁴³ Staff Report – Revenue Requirement/Cost of Service, Ex. 200, Pages 105-111.

²⁴⁴ *In the Matter of Union Electric Company, d/b/a AmerenUE's Tariffs to Increase its Annual Revenues for Electric Service*, Order Directing the Parties to Submit Testimony Concerning the Appropriateness of AmerenUE's Current Fuel Adjustment Clause, File No. ER-2010-0036, February 17, 2010.

²⁴⁵ ER-2008-0318.

system sales.²⁴⁶ Brubaker would, however, cap the impact of the sharing mechanism so that the sharing would have no more than a 50 basis point impact on AmerenUE's return on equity.²⁴⁷

6. Public Counsel also offered testimony supporting an 80/20 sharing mechanism. Ryan Kind offered his opinion that such a sharing percentage is necessary to ensure that AmerenUE continues to make its best efforts to minimize fuel costs and maximize its off-system sales margins.²⁴⁸

7. Staff filed supplemental testimony explaining that since little time has passed since AmerenUE's fuel adjustment clause went into effect, it has not compiled enough data to meaningfully analyze that fuel adjustment clause. As a result, Staff suggests the Commission leave the current fuel adjustment clause in place without changing the sharing mechanism.²⁴⁹

Specific Findings of Fact:

8. In AmerenUE's last rate case, the Commission found that AmerenUE should be allowed to establish a fuel adjustment clause because its fuels costs were substantial, beyond the control of the company's management, and volatile in amount. The Commission also found that AmerenUE needed a fuel adjustment clause to have a sufficient opportunity to earn a fair return on equity and to be able to compete for capital with other utilities that have a fuel adjustment clause.²⁵⁰ In the same rate case, the

²⁴⁶ Brubaker Additional Direct – FAC, Ex. 413, Attachment 2, Page 11 of 19.

²⁴⁷ Brubaker Additional Direct – FAC, Ex. 413, Attachment 2, Page 11 of 19.

²⁴⁸ Kind Additional Direct – FAC, Ex. 301, Page 2, Lines 3-18.

²⁴⁹ Mantle Supp. Direct – FAC, Ex. 221, Pages 5-6, Lines 15-23, 1-7.

²⁵⁰ *In the Matter of Union Electric Company, d/b/a AmerenUE's Tariffs to Increase its Annual Revenues for Electric Service*, Report and Order, Case No. ER-2008-0318, January 27, 2009,

Commission found that a 95/5 sharing mechanism would give AmerenUE a sufficient opportunity to earn a fair return on equity, while protecting customers by preserving the company's incentive to be prudent.²⁵¹

9. Nothing has changed in the months since the Commission established AmerenUE's fuel adjustment clause to cause the Commission to change that decision. The Commission finds that AmerenUE's fuel and purchased power costs are clearly substantial, comprising 47 percent of the company's total operations and maintenance expense. Furthermore, the revenue the company receives from off-system sales, which is also tracked through the fuel adjustment clause, is also substantial.²⁵² These fuel and purchased power costs continue to be dictated by national and international markets, and thus are outside the control of AmerenUE's management.²⁵³ Finally, these costs and revenues continue to be volatile. For example, the price AmerenUE was able to obtain in the market for off-system electricity sales declined by nearly half from 2008 to 2009.²⁵⁴

10. Furthermore, the Commission finds that AmerenUE still needs a fuel adjustment clause to help alleviate the effects of regulatory lag as net fuel costs continue to rise. AmerenUE's regulatory lag problems have not improved since its last rate case. In recent years, the company has been unable to earn its allowed rate of return, and in large part, that problem is due to fuel-related issues.²⁵⁵ Even with the fuel adjustment clause in place, AmerenUE's return on equity for the year ending December 2009, was only 7.27 percent.

Pages 69-70.

²⁵¹ *Id.*, at Page 76.

²⁵² Barnes Direct, Ex. 121, Page 7, Lines 17-23.

²⁵³ Barnes Direct, Ex. 121, Page 7, Lines 23-26.

²⁵⁴ Haro Additional Rebuttal – FAC, Ex. 126, Page 13, Lines 13-19.

²⁵⁵ Transcript, Page 2409, Lines 5-11.

Without a fuel adjustment clause, that return would have dropped to 6.69 percent, over 400 basis points below the company's authorized return on equity of 10.76 percent.²⁵⁶ In addition, AmerenUE still must compete in the capital markets with other utilities and the vast majority of those utilities have fuel adjustment clauses.²⁵⁷

11. For the forgoing reasons, the Commission finds that AmerenUE should be allowed to continue to operate under a fuel adjustment clause. However, the Commission's chief concern about the existing fuel adjustment clause, and the reason it asked the parties to present additional testimony about this matter, is an uncertainty about the appropriate amount of sharing required to assure that AmerenUE continues to make its best efforts to control its fuel-related costs and to maximize its off-system sales.

12. The majority of electric utilities operate with a fuel adjustment clause that does not have any sort of sharing mechanism.²⁵⁸ Yet, the Commission is concerned that allowing an uncontrolled pass-through of costs will reduce a utility's incentive to carefully examine and perhaps reduce those costs. In the last rate case, the Commission decided that a 95/5 sharing mechanism was appropriate to allow the company to recover its prudently incurred costs while still protecting ratepayers. But the Commission wanted to know how well that sharing mechanism was working in practice.

13. MIEC and Public Counsel advocated for a revised sharing mechanism that would require AmerenUE to absorb a larger percentage of increasing fuel costs to increase its incentive to properly manage those costs. However, the testimony those parties presented was based on little more than the opinions of their witnesses about an appropriate sharing

²⁵⁶ Barnes Additional Direct – FAC, Ex. 122, Page 5, Lines 16-19.

²⁵⁷ Transcript, Page 2421, Lines 1-6.

²⁵⁸ Transcript, Page 2421, Lines 7-14.

percentage. No party presented any evidence that would indicate how the 95/5 sharing mechanism is working in practice for this company. Certainly, no evidence was produced to show that AmerenUE had acted imprudently with regard to its procurement of fuel and off system sales since the fuel adjustment clause went into effect in March 2009. On the contrary, the efficiency of AmerenUE's power plant performance as measured by equivalent availability improved in 2009, after the fuel adjustment clause was put into effect.²⁵⁹

14. As Staff explained in its testimony, the implementation of AmerenUE's fuel adjustment clause has only just begun. Staff will not complete its first prudence review of AmerenUE's operations under the existing fuel adjustment clause until August 2010.²⁶⁰ The prudence review is very important to Staff in determining whether the fuel adjustment clause was working in the manner intended, as is seeing whether AmerenUE has changed its practices regarding their purchase and hedging of fuel and regarding off-system sales.²⁶¹ Until that review process is complete, Staff concluded it would not have sufficient data to meaningfully analyze the effectiveness of AmerenUE's fuel adjustment clause.²⁶²

15. Substantially changing the existing fuel adjustment clause without a meaningful analysis could have severe adverse consequences for AmerenUE and ultimately for ratepayers. Gary Rygh, a witness for AmerenUE explained that a significant modification to AmerenUE's fuel adjustment clause outside the context of a prudence review process could lead investors to conclude either that AmerenUE was improperly managing its net

²⁵⁹ Barnes Additional Direct – FAC, Ex. 122, Page 8, Lines 10-11.

²⁶⁰ Mantle Supplemental Direct – FAC, Ex. 221, Page 12, Lines 15-16.

²⁶¹ Transcript, Page 2517, Lines 17-23.

²⁶² Mantle Supplemental Direct – FAC, Ex. 221, Page 6, Lines 3-7.

fuel costs, or that the Commission was acting rashly in overturning regulatory stability in Missouri.²⁶³ Julie Cannell, another witness for AmerenUE, explained that investors value certainty, fairness, stability, and predictability. She indicated “a lack of consistency in a commission’s actions or decisions serves to increase the investment risk associated with a utility.”²⁶⁴ Increased financial risk results in an increase in a company’s cost of borrowing, ultimately increasing costs that will be passed on to ratepayers.²⁶⁵

Conclusions of Law:

A. Section 386.266.1, RSMo (Supp. 2009), the statute that allows the Commission to establish a fuel adjustment clause provides as follows:

Subject to the requirements of this section, any electrical corporation may make an application to the commission to approve rate schedules authorizing an interim energy charge or periodic rate adjustments outside of general rate proceedings to reflect increases and decreases in its prudently incurred fuel and purchased-power costs, including transportation. The commission may, in accordance with existing law, include in such rate schedules features designed to provide the electrical corporation with incentives to improve the efficiency and cost-effectiveness of its fuel and purchased-power procurement activities.

Subsection 4 of that statute sets out some of the provisions that must be included in a fuel adjustment clause as follows:

The commission shall have the power to approve, modify, or reject adjustment mechanisms submitted under subsections 1 to 3 of this section only after providing the opportunity for a full hearing in a general rate proceeding, including a general rate proceeding initiated by complaint. The commission may approve such rate schedule after considering all relevant factors which may affect the cost or overall rates and charges of the corporation, provided that it finds that the adjustment mechanism set forth in the schedules:

²⁶³ Rygh Rebuttal – FAC, Ex. 120, Pages 5-6, Lines 20-23, 1-5. Rygh is a Managing Director at Barclays Capital, Inc., an investment bank in New York.

²⁶⁴ Cannell Rebuttal, Ex. 117, Pages 25-26, Lines 21, 1-2. Cannell is a securities analyst in New York.

²⁶⁵ Cannell Rebuttal – FAC, Ex. 118, Page 5, Lines 2-3.

(1) Is reasonably designed to provide the utility with a sufficient opportunity to earn a fair return on equity;

(2) Includes provisions for an annual true-up which shall accurately and appropriately remedy any over- or under-collections, including interest at the utility's short-term borrowing rate, through subsequent rate adjustments or refunds;

(3) In the case of an adjustment mechanism submitted under subsections 1 and 2 of this section, includes provisions requiring that the utility file a general rate case with the effective date of new rates to be no later than four years after the effective date of the commission order implementing the adjustment mechanism. ...

(4) In the case of an adjustment mechanism submitted under subsections 1 or 2 of this section, includes provisions for prudence reviews of the costs subject to the adjustment mechanism no less frequently than at eighteen-month intervals, and shall require refund of any imprudently incurred costs plus interest at the utility's short-term borrowing rate. (emphasis added)

Subsection 4(1) is emphasized because that is the key requirement of the statute. Any fuel adjustment clause the Commission allows AmerenUE to implement must be reasonably designed to allow the company a sufficient opportunity to earn a fair return on equity.

B. Subsection 7 of the fuel adjustment clause statute provides the Commission with further guidance, stating the Commission may:

take into account any change in business risk to the corporation resulting from implementation of the adjustment mechanism in setting the corporation's allowed return in any rate proceeding, in addition to any other changes in business risk experienced by the corporation.

Finally, subsection 9 of that statute requires the Commission to promulgate rules to "govern the structure, content and operation of such rate adjustments, and the procedure for the submission, frequency, examination, hearing and approval of such rate adjustments." In compliance with the requirements of the statute, the Commission promulgated Commission Rule 4 CSR 240-3.161, which establishes in detail the procedures for submission, approval, and implementation of a fuel adjustment clause.

C. Specifically, Commission Rule 4 CSR 240-3.161(3) establishes minimum filing requirements for an electric utility that wishes to continue its fuel adjustment clause in a rate case subsequent to the rate case in which the fuel adjustment clause was established. AmerenUE has met those filing requirements.

Decision:

The Commission concludes AmerenUE should be allowed to continue to implement the fuel adjustment clause the Commission approved in the company's last rate case. Given the short amount of time AmerenUE's fuel adjustment clause has operated and the resulting lack of information about how effective the current sharing mechanism has been, the Commission will not modify that clause, except as provided in the previously approved stipulation and agreement. The Commission expects to further review AmerenUE's fuel adjustment clause and the appropriate sharing mechanism to be included in that clause as part of AmerenUE's next rate case.

9. Rate Design and Class Cost of Service Issues

a. Rate Design

Findings of Fact:

Introduction:

1. After the Commission determines the amount of rate increase that is necessary, it must decide how that rate increase will be spread among AmerenUE's customer classes. The basis principle guiding that decision is that the customer class that causes a cost should pay that cost.
2. During the course of the hearing, Public Counsel, MIEC, AARP and the Consumers Council of Missouri, and the Missouri Retailers Association filed a nonunanimous stipulation

and agreement that reached an agreement on how the rate increase should be allocated to the customer classes. AmerenUE and Staff did not sign the stipulation and agreement but do not oppose the compromise agreement. MEUA, however, does oppose that agreement. Subsequently, the parties that signed the original stipulation and agreement submitted an addendum to that stipulation and agreement. MEUA also opposed the addendum.

3. Because the stipulation and agreement and the addendum to that stipulation and agreement are opposed, the Commission cannot approve the stipulation and agreement or the addendum. Nevertheless, the compromise described in the stipulation and agreement and addendum remains the position of the signatory parties and the Commission can consider that position as it decides this issue.

4. AmerenUE has seven customer classes.²⁶⁶ The Residential class is comprised of residential households. The Small General Service and Large General Service classes are comprised of commercial operations of various sizes. The first three classes receive electric service at a low secondary voltage level. The Small Primary Service and the Large Primary Service are larger industrial operations that receive their electric service at a high voltage level. The Large Transmission Service class takes service at a transmission voltage level.

5. There is only one member of the Large Transmission class, Noranda Aluminum, Inc.²⁶⁷ Noranda operates an aluminum smelter in Southeast Missouri and purchases

²⁶⁶ Cooper Direct, Ex. 134, Page 4, Lines 8-22.

²⁶⁷ Staff's Class Cost-Of-Service and Rate Design Report, Ex. 205, Page 27, Lines 17-18.

massive amounts of electricity from AmerenUE. When the smelter is at full production, Noranda pays AmerenUE approximately \$140 million per year for electricity²⁶⁸

6. AmerenUE's last customer class is the Lighting class, which consists of both area and street lighting.²⁶⁹ The Lighting class has a unique load pattern in that it is on at night and, for the most part, off during the day. For that reason, its class load is typically very low during periods of peak demand.²⁷⁰

Specific Findings of Fact:

7. To evaluate how best to allocate costs among these customer classes, four parties prepared and presented class cost of service studies. The studies presented by AmerenUE and MIEC used versions of the Average and Excess Demand Allocation method (A&E). An A&E allocation method considers both the maximum rate of use (demand) and the duration of use (energy). The A&E method conceptually splits the system into an average component and an excess component. The average demand is the total kWh usage divided by the total number of hours in the year. This is the amount of capacity that would be required to produce the energy if it were taken at the same demand rate each hour. The system excess demand is the difference between the system peak demand and the system average demand. The average demand is allocated to the various classes in proportion to their average demand (energy usage). The difference between the system average demand and the system peak or peaks is then allocated to customer classes on the basis of a measure that represents their peaking or variability in usage²⁷¹

²⁶⁸ Gregston Direct, Ex. 422, Page 3, Lines 5-14.

²⁶⁹ Cooper Direct, Ex. 134, Page 4, Lines 15-16.

²⁷⁰ Staff's Class Cost-Of-Service and Rate Design Report, Ex. 205, Page 12, Lines 15-16.

²⁷¹ Brubaker Direct, Ex. 429, Pages 23-24, Lines 15-22, 1-5.

8. Staff and Public Counsel also presented class cost of service studies, but they used a different allocation method known as a Peak and Average Demand Allocation method. Staff's allocation method is based on the assumption that an electric utility adds capacity to meet its entire load rather than to just meet its peak load demand.²⁷² Public Counsel also presented a second study using a time of use method.

9. The following chart compares the results of each of the class cost of service studies, indicating the percent change in class revenues required to equalize class rates of return, as well as the dollar amounts needed to bring a class to its indicated cost of service. A negative number means the class is paying more than its indicated share of costs. A positive number means the class is paying less than its indicated share. All dollar figures are in millions.

Study	Residential	Small General Service	Large General Service	Large Primary Service	Large Transmission Service
Staff - 4 CP A&P ²⁷³	8.67% \$83.5	-4.24% \$(10.5)	-11.40% (\$73.7)	-0.55% (\$0.9)	3.57% \$5.0
AmerenUE ²⁷⁴	7.99% \$78.0	-7.01% (\$17.6)	-9.74% (\$64.8)	1.21% \$2.1	1.63% \$2.3
OPC (TOU)	1.23% \$11.8	-9.40% (\$23.3)	-3.77% (\$24.4)	8.80% \$14.7	15.27% \$21.2
OPC (A&P) ²⁷⁵	3.35% \$32.2	-7.60% (\$18.9)	-4.69% (\$30.3)	7.17% \$12.0	3.56% \$5.0
MIEC ²⁷⁶	13.30% \$129.6	-4.30% (\$10.7)	-12.70% (\$84.6)	-7.40% (\$12.7)	-15.50% (\$21.6)

²⁷² Scheperle Rebuttal, Ex. 207, Page 2, Lines 13-19.

²⁷³ Ex. 553.

²⁷⁴ Ex. 551.

²⁷⁵ Ex. 552.

²⁷⁶ Brubaker Revised Direct, Ex. 429, Schedule MEB-COS-5.

For example, Staff's study indicated the Residential class is currently paying \$83.5 million less than AmerenUE's cost to serve that class. In contrast, according to Staff's study, the Large General Service class is currently paying \$73.7 million more than AmerenUE's cost to serve that class. Although the exact numbers vary among the various studies, all the studies agree that the Residential class is currently paying substantially less than its cost of service and that the Large General Service class is currently paying substantially more than its cost of service.

10. In starting the process to develop just and reasonable rates, the first question the Commission must resolve is which of the submitted class cost of service studies best describes AmerenUE's cost to serve its various customer classes. As a first step, the Commission will discard the Staff and Public Counsel studies that utilize a Peak and Average Demand production demand allocation method.

11. Staff asserts that its Peak and Average Demand allocation method is superior to the Average and Excess method because it considers each class' contribution to the system's total peak rather than each class' excess demand at peak.²⁷⁷ However, what Staff describes as its method's strength is actually its downfall because the Peak and Average demand method double counts the average demand of the customer classes.

12. Some customer classes, such as large industrials, may run factories at a constant rate, 24 hours a day, 7 days a week. Therefore, their usage of electricity does not vary significantly by hour or by season. Thus, while they use a lot of electricity, that usage does not cause demand on the system to hit peaks for which the utility must build or acquire additional capacity. Another customer class, for example, the residential class, will

²⁷⁷ Scheperle Rebuttal, Ex. 207, Page 5, Lines 11-14.

contribute to the average amount of electricity used on the system, but it will also contribute a great deal to the peaks on system usage, as residential usage will tend to vary a great deal from season to season, day to day, and hour to hour.

13. To recognize that pattern of usage, the Average and Excess method separately allocates energy cost based on the average usage of the system by the various customer classes. It then allocates the excess of the system peaks to the various customer classes by a measure of that class' contribution to the peak. In other words, the average and excess costs are each allocated to the customer classes once.

14. The Peak and Average method, in contrast, initially allocates average costs to each class, but then, instead of allocating just the excess of the peak usage period to the various classes to the cost causing classes, the method reallocates the entire peak usage to the classes that contribute to the peak. Thus, the classes that contribute a large amount to the average usage of the system but add little to the peak, have their average usage allocated to them a second time. Thus, the Peak and Average method double counts the average system usage, and for that reason is unreliable.²⁷⁸

15. Public Counsel also offered a time of use study that assigns production costs to each hour of the year that the specific production occurs. The method then sums each class' share of hourly investments based on only those hours when the class actually uses the system.²⁷⁹ Public Counsel's time of use method is also unreliable because it considers every hour in the year to be a demand peak. As a result, the actual peaks in usage are given no additional weight. This, of course, benefits the residential class, which tends to

²⁷⁸ Brubaker Rebuttal, Ex. 430, Pages 12-14. See also, Transcript, Pages 3095-3096, Lines 24-25, 1-22.

²⁷⁹ Meisenheimer Direct, Ex. 307, Page 7, Lines 5-7.

drive peaks, at the expense of industrial users of electricity that have high load factors and contribute little to the peaks in usage.²⁸⁰

16. Since the class cost of service studies offered by Staff and Public Counsel are unreliable, the Commission must choose between the Average and Excess method studies submitted by AmerenUE and MIEC. That task is difficult in this case because most of the testimony offered by AmerenUE and MIEC's witnesses criticize the methods used by Staff and Public Counsel and offer little criticism of each others studies. Yet, the studies do reach different results.

17. Significantly, MIEC's study tends to shift more cost causation from the Large General Service, Large Primary Service and especially the Large Transmission Service classes to the Residential class than does the AmerenUE study. AmerenUE's witness, William Warwick, explained those cost shifts in his rebuttal testimony.²⁸¹ In the allocation of transmission costs, non-fuel generation expenses, off-system sales revenue, and general plant, MIEC advocated modifications to AmerenUE's study that would tend to decrease the allocation of those costs to the large industrial customers who are the members of MIEC.²⁸² AmerenUE contends most of these adjustments are inappropriate.

18. However, AmerenUE's witness agrees that one of the adjustments proposed by MIEC's witness is credible. In his class cost of service study, MIEC's witness, Maurice Brubaker allocated revenues from off-system sales to customer classes on the basis of class energy (kWh) requirements.²⁸³ Staff made a similar allocation of revenues in its class

²⁸⁰ Brubaker Rebuttal, Ex. 430, Page 18, Lines 12-19.

²⁸¹ Warwick Rebuttal, Ex. 147.

²⁸² Warwick Rebuttal, Ex. 147, Pages 2-8.

²⁸³ Brubaker Direct, Ex. 429, Page 30, Lines 11-14.

cost of service study, and AmerenUE's witness concedes that such an allocation could be appropriate.²⁸⁴ In addition, Brubaker's allocation is consistent with the methodology the Commission approved in a slightly different context in a recent Kansas City Power & Light rate case, ER-2006-0314.²⁸⁵

19. If AmerenUE's class cost of service study is modified to allocate revenues from off-system sales on the basis of class energy requirements, then that study would show that the large transmission service class is currently paying approximately 8 percent more than its indicated revenue share. The revised study would also show that the large general service class is overpaying by 11 percent and the residential class is underpaying by 11 percent.

20. After carefully considering all the studies, the Commission finds that AmerenUE's class cost of service study, modified to allocate revenues from off-system sales on the basis of class energy requirements, is the most reliable of the submitted studies.

21. Evaluating the submitted class cost of service studies is only the Commission's first step in designing just and reasonable rates for AmerenUE. In general, it is important that each customer class carry its own weight by paying rates sufficient to cover the cost to serve that class. That is a matter of simple fairness in that one customer class should not be required to subsidize another. Requiring each customer class to cover its actual cost of service also encourages cost effective utilization of electricity by customers by sending correct price signals to those customers.²⁸⁶ However, the Commission is not required to precisely set rates to match the indicated class cost of service. Instead, the Commission

²⁸⁴ Warwick Rebuttal, Ex. 147, Pages 5-7.

²⁸⁵ Brubaker Direct, Ex. 429, Page 30, Line 14.

²⁸⁶ Cooper Direct, Ex. 134, Pages 16-17, Lines 13-22, 1-2.

has a great deal of discretion to set just and reasonable rates, and can take into account other factors, such as public acceptance, rate stability, and revenue stability in setting rates.

22. AmerenUE and, initially, Public Counsel, proposed that any rate increase should be allotted equally to each customer class. In other words, each class would receive the system average percentage increase.²⁸⁷ That would leave the existing disparities revealed in the class cost of service studies unchanged.

23. Staff proposed that a small adjustment be made to shift \$3 million in revenue responsibility from the large general service class to the residential class. Staff's adjustment would represent approximately a 0.3 percent increase in revenue responsibility to the residential class and a 0.5 percent decrease in revenue responsibility to the large general service class.²⁸⁸

24. MIEC proposed that each customer class be moved 20 percent toward its cost of service as shown in MIEC class cost of service study. That move would require a 2.6 percent revenue neutral increase from the residential class,²⁸⁹ to collect \$25.9 million in additional revenue from the residential class.²⁹⁰ However, MIEC would not stop there: Brubaker also advocated that the Large Transmission class, whose only member is Noranda, be moved entirely to its cost of service as shown in MIEC's class cost of service

²⁸⁷ Cooper Direct, Ex. 134, Page 18, Lines 12-13. See also, Kind Direct, Ex. 300, Page 8, Lines 7-11.

²⁸⁸ Staff's Class Cost-of-Service and Rate Design Report, Ex. 205, Page 24, Lines 8-15.

²⁸⁹ Brubaker Revised Direct, Ex. 429, Page 36, Lines 13-19.

²⁹⁰ Brubaker Revised Direct, Ex. 429, Schedule MEB-COS-6.

study. That extra movement would require an additional \$8.2 million from the residential class and would reduce the rate relief that would otherwise flow to the other rate classes.²⁹¹

25. Finally, MEUA, whose members take electric service as part of the large general service class, recommended the Commission adopt MIEC's proposed 20 percent revenue neutral adjustment, but without the extra adjustment to move the large transmission class to its cost of service.²⁹²

26. The stipulation and agreement to which MEUA objected would shift revenue responsibility to the residential, small general service and large primary service classes from the large transmission class and to a lesser extent, the large general service and small primary service classes. The addendum to the stipulation and agreement, to which MEUA also objected, would allocate a slightly larger revenue responsibility reduction to the large general service class.

27. Specifically, for an overall rate increase of \$225 million, which is approximately the rate increase that will result from this order, the addendum to the stipulation and agreement would impose a roughly 1.5 percent revenue-neutral increase on the residential and small general service classes. That amounts to a revenue neutral increase of \$14.5 million for the residential class and \$3.8 million for the small general service class. It would also impose a 1.25 percent revenue neutral increase, amounting to an additional \$2 million, on the large primary class.

28. On the other side of the coin, the large transmission class, whose only member is Noranda, would receive a revenue neutral reduction of 11.74 percent, which amounts to a reduction of approximately \$16.3 million. That means Noranda would receive an actual

²⁹¹ Brubaker Revised Direct, Ex. 429, Schedule MEB-COS-6.

²⁹² Chriss Rebuttal, Ex. 550, Page 11, Lines 3-12.

rate reduction of approximately \$2.1 million, or a 1.54 percent overall reduction. That would occur while the residential class received an 11.70 percent rate increase. The large general service/small primary service class would receive a smaller revenue neutral reduction of 0.7%, amounting to \$4.579 million. That means the large general service/small primary service class would receive an overall rate increase of 9.59 percent.

29. The reallocation of revenue responsibility the signatories agreed to in the stipulation and agreement, now their joint position, bears some resemblance to the results of AmerenUE's modified class cost of service study, which the Commission found to be the most reliable of the submitted studies. AmerenUE's study, and indeed, all the submitted studies, indicate that the residential class is paying substantially less than its actual revenue responsibility. The stipulated position would bring that revenue class closer to its actual cost of service. The stipulated position would also provide the large transmission service class, Noranda, with the largest rate reduction, even though AmerenUE's modified class cost of service study indicates the large general service class is currently overpaying its actual cost of service by a larger percentage.

30. MIEC, and in particular, Noranda, attempt to justify these results by claiming that Noranda needs special rate consideration to remain competitive with other aluminum smelters in the United States, lest it be forced to close, resulting in economic devastation to Missouri.

31. There is no doubt that the closure of Noranda's New Madrid aluminum smelter would have a severe impact on the economy of Southeast Missouri. Noranda directly employs some 900 people at its smelter, at an annual payroll of \$60 million. Were the plant to close,

the Southeast Missouri region could lose over 3,200 jobs from its economy and state and local governments would lose \$16 million per year in tax revenues.²⁹³

32. Noranda's aluminum smelter produces molten aluminum from aluminum oxide, known as alumina. The alumina is brought up the Mississippi river by barge for delivery to the smelter.²⁹⁴ The processing of the alumina into aluminum requires a tremendous amount of electricity. When the smelter is at full production, at current electric rates, Noranda pays AmerenUE \$140 million for electricity each year. The cost of electricity represents a little less than one-third of the smelter's cost of producing aluminum.²⁹⁵

33. Electricity is not the only cost factor affecting the continued viability of the New Madrid smelter, and MEUA demonstrated that the New Madrid smelter appears to possess certain competitive advantages over other competing smelters apart from the cost of electricity. For example, the smelter's geographic location on the Mississippi river reduces its cost to transport supplies of alumina.²⁹⁶ If the market price of aluminum rises, Noranda may also benefit from paying a fixed rate for electricity while many of its competitors pay a rate for electricity that varies with the market price of aluminum.²⁹⁷ Noranda expects that aluminum prices will rise in the future.²⁹⁸ Still, while there is no evidence to indicate that Noranda is on the verge of shutting down its smelter with or without an electric rate increase, the smelter's long-term viability is dependent upon maintaining reasonably competitive electric rates.

²⁹³ Coomes Direct, Ex. 419, Page 2, Lines 4-12.

²⁹⁴ Gregston Direct, Ex. 422, Page 1, Lines 12-17.

²⁹⁵ Gregston Direct, Ex. 422, Page 3, Lines 5-14.

²⁹⁶ Transcript, Page 2948, Lines 17-21.

²⁹⁷ Transcript, Page 2948, Lines 2-7.

²⁹⁸ Transcript, Page, 2959, Lines 1-5.

34. The large general service customer class is also currently paying more than its indicated revenue share and the stipulated position would provide that class with \$4,579,000 of rate relief. But no evidence was presented that would show that the members of the large general service customer class need rate relief to remain competitive in the same way that Noranda needs that relief.

35. Clearly, Noranda will be affected by the rate increase that will result from this case. But the same can be said about all the other businesses and families that must pay AmerenUE for the electricity they need. The reduction proposed by the stipulated position would give Noranda an actual rate decrease of \$2.147 million while all other customers have to absorb a rate increase. That result is inappropriate. While generally accepting the joint position, the Commission will modify that position to provide that the revenue neutral reduction in the large transmission service class's rate shall be set at a level that leaves that class' total revenue contribution unchanged. The joint position's revenue increase for the residential class shall be reduced by the amount taken from the large transmission class' revenue reduction. The lighting class' class revenue responsibility will be addressed in the next section of this report and order.

36. The objected to stipulation and agreement also purports to resolve certain issues regarding customer charges, Rider B voltage credits, and the Reactive Charge. No party, including MEUA, objects to that aspect of the stipulation and agreement.²⁹⁹

37. Specifically, the signatories agree that the residential customer charge should be set at \$8.00 per month, with the remaining revenue assigned to the residential class to be allocated to volumetric charges. AmerenUE proposed that the residential customer charge

²⁹⁹ See. Initial Posthearing Brief of Midwest Energy Users Association, Page 11.

be increased to \$10.00 per month from its current level of \$7.25.³⁰⁰ Staff recommended the residential customer charge be increased to \$8.50 per month.³⁰¹ However, neither Staff nor AmerenUE objects to a residential customer charge of \$8.00 per month. The Commission finds that \$8.00 per month is a reasonable residential customer charge.

38. The signatories also agree as follows:

the Small Power Service (SPS), Large Primary Service (LPS) and Large Transmission Service (LTS) customer charges should be set to \$234.33, then those customer charges should be increased by the same percentage as the system average percentage increase, i.e., each will be increased by the same percentage and each will be the same. The signatories agree the rates for Rider B voltage credits (Tariff Sheet 99) should remain the same for all applicable rate schedules. The existing Rider B voltage credits should be increased by the same percentage as the system average percentage increase. The particular Rider B voltage credits as they now exist follow:

- A monthly credit of \$0.90/kW of billing demand for customers taking service at 34.5 or 69kV.
- A monthly credit of \$1.06/kW of billing demand for customers taking service at 115kV or higher.

The Signatories agree the rate for the Reactive Charge should be the same for all applicable rate schedules and that the existing Reactive Charge should be increased by the same percentage as the system average percentage increase. The current Reactive Charge for SPS (Tariff Sheet 37), LPS (Tariff Sheet 67.1) and LTS (Tariff Sheet 68) classes are \$027 per kVar. The Signatories agree the customer charge associated with Time-of-Day rates should be the same for all applicable non-residential rate schedules and that the existing Time-of-Day customer charge should be increased by the same percentage as the system average percentage increase. The current Time-of-Day customer charge for the Large General Service class (LGS)(Tariff Sheet 34), SPS (Tariff Sheet 37, LPS (Tariff Sheet 67.1) and LTS (Tariff Sheet 68) is \$15.25. The Signatories agree the Small General Service class (SGS) customer charge should be \$9.28 for single-phase service and \$18.56 for three-phase service (Tariff Sheet 32). With the foregoing exceptions, all other rate elements within each rate schedule shall be increased by an equal percentage basis so that collectively all rate elements on that schedule are designed to collect the revenue assigned to the class to which that rate schedule applies.

³⁰⁰ Cooper Direct, Ex. 134, Page 21, Lines 1-7.

³⁰¹ Staff's Class Cost-of-Service and Rate Design Report, Ex. 205, Page 24, Line 18.

The agreed upon positions are generally consistent with the positions taken by Staff and AmerenUE and neither party has objected to those positions. The Commission finds that the agreed upon positions stated in the stipulation and agreement are reasonable and the Commission adopts those positions.

39. The signatories also agreed to adopt Staff's position that the following features should be returned to uniformity:

- The value of the customer charge be uniform across rate schedules, with the customer charges on the SPS, LPS, and LTS rate schedules being the same.
- The rates for Rider B voltage credits be the same under all applicable rate schedules.
- The rates for the Reactive Charge be the same for all applicable rate schedules.
- The rates associated with Time-of-Day meter charge be the same for all applicable non-residential rate schedules.³⁰²

Staff's testimony explained that these features had been uniform until implementation of the rate design in AmerenUE's last rate case. The Commission finds that the agreed upon position is reasonable and that position is adopted.

Conclusions of Law:

There are no additional conclusions of law for this issue.

Decision:

The Commission generally accepts the joint position, but will modify that position to provide that the revenue neutral reduction in the large transmission service class's rate shall be set at a level that leaves that class' total revenue contribution unchanged. The joint position's revenue increase for the residential class shall be reduced by the amount

³⁰² Staff's Class Cost-of-Service and Rate Design Report, Ex. 205, Page24, Lines 1-6.

taken from the large transmission class' revenue reduction. The lighting class' class revenue responsibility will be addressed in the next section of this report and order.

b. Street Lighting

Findings of Fact:

Introduction:

40. The members of the lighting class of customers largely consists of municipalities that purchase electricity from AmerenUE to light their streets at night. The lighting class has a unique load pattern in that the street lights are generally on only at night. That means street lights are drawing power when demand from other users tends to be low, and as a result the lighting class does not contribute much to peak demand. As previously discussed, peak demand tends to drive costs, so the lighting class does not fit well into a general class cost of service study.³⁰³ For that reason, the class cost of service studies submitted by Staff and AmerenUE did not separately calculate the cost of serving the lighting class. Instead, their cost of service studies allocated all direct lighting costs and revenues to the other classes based on each class' share of AmerenUE's total cost-of-service.³⁰⁴ That allocation method assumes that the company's rates for lighting service have been established at or near their cost of service,³⁰⁵ but it does not actually determine whether that assumption is correct.

³⁰³ Staff's Class Cost-of-Service and Rate Design Report, Ex. 205, Page 12, Lines 15-21.

³⁰⁴ Staff's Class Cost-of-Service and Rate Design Report, Ex. 205, Page 12, Lines 21-25.

³⁰⁵ Staff's Class Cost-of-Service and Rate Design Report, Ex. 205, Page 13, Lines 1-3. *See also*, Warwick Direct, Ex. 146, Page 4, Lines 1-15.

41. The same allocation method was used in AmerenUE's last two rate cases, and no actual cost of service study has been done for the lighting class over that time.³⁰⁶ AmerenUE may have last performed a comprehensive street lighting study sometime in the 1980's but it has been unable to locate that study.³⁰⁷ Since AmerenUE's cost to serve the lighting class has not been studied since at least the 1980's, the lighting class has simply been allocated the same across the board rate adjustments allocated to the other rate classes. AmerenUE and Staff would continue that practice in this case.

42. The lighting class has not been represented in AmerenUE's previous rate cases, but the Municipal Group intervened in this case to bring the lighting class' issues to the Commission's attention. In the First Stipulation and Agreement, filed on March 10, before the start of the hearing, the signatory parties agreed that AmerenUE would cooperate with all interested parties in preparing a cost of service study regarding the lighting class for use in the company's next rate case.³⁰⁸ The Municipal Group did not sign that stipulation and agreement, but it did not oppose it, and the Commission approved the stipulation and agreement on March 24.³⁰⁹

43. Despite the stipulation and agreement's provision for a future class cost of service study, the Municipal Group continues to seek immediate relief in this case. Specifically, the Municipal Group seeks:

³⁰⁶ Transcript, Page 2871, Lines 3-20.

³⁰⁷ Transcript, Page 2872, Lines 1-4.

³⁰⁸ First Nonunanimous Stipulation and Agreement, Page 7.

³⁰⁹ In the Matter of Union Electric Company, d/b/a AmerenUE's Tariffs to Increase Its Annual Revenues for Electric Service, File No. ER-2010-0036, Order Approving First Stipulation and Agreement (March 24, 2010).

1. A moratorium on any new street lighting rates under the 5M and 6M tariffs pending the outcome of the cost of service study and its introduction in AmerenUE's next rate case, or, in the alternative that AmerenUE hold in escrow any increase ordered for the 5M and 6M street lighting rates pending the review of the street lighting cost of service study in AmerenUE's next rate case; and
2. The elimination of any future pole installation charges from 5M customer bills until such pole installation charges can be justified in AmerenUE's next rate case; and
3. A credit for the 5M customers for all other revenues received by AmerenUE for itself and other entities for their use of these same poles for telephone, cable TV, electric distribution lines, etc.³¹⁰

Specific Findings of Fact:

44. AmerenUE currently collects roughly \$31 million per year system-wide from the lighting class.³¹¹ That represents about 1.4 percent of the company's total base rate revenues.³¹² The company collects a part of that revenue from its 5M and 6M rates for street lighting, but the exact amount AmerenUE collects under those two particular rates is not revealed in the record.

45. The 5M classification is for street lights that are owned and maintained by AmerenUE. Those street lights are not metered. Instead, the 5M customer is billed by

³¹⁰ Initial Brief of the Municipal Group, Pages 10-11.

³¹¹ Transcript, Page 2869, Lines 6-15.

³¹² Warwick Direct, Ex. 146, Page 4, Lines 11-12.

fixture and pole type according to the number of lights in each rate category.³¹³ The street lighting bill can be a significant expense for a municipality. For example, the City of University City budgets approximately \$640,000 per year for 5M street lighting.³¹⁴ The 6M classification covers metered and unmetered street lighting that is owned by the customer rather than AmerenUE.³¹⁵

46. After comparing the 5M rate to the 6M rate, the Municipal Group contends it is being overcharged for maintenance portion of the 5M rate.³¹⁶ The Municipal Group also contends it is being overcharged under the 5M rate for pole installation charges for poles installed before 1988. The Municipal Group claims that having collected an installation charge for more than 20 years, AmerenUE should have recovered its installation costs by now.³¹⁷

47. Finally, the Municipal Group notes that AmerenUE collects revenue from other entities for various installations added onto the street lighting poles, such as cable TV lines. The municipalities contend that since they are in effect renting the poles, they should receive a cut of that revenue.³¹⁸ AmerenUE explains that it accounts for that extra revenue as an offset to its base rate revenues in its rate cases. In other words, a dollar collected from a cable company for hanging a line on a light pole would be a dollar the company would not collect from its customers, including the lighting customers.³¹⁹ Thus, the Commission finds that those revenues do, at least indirectly benefit the lighting customers.

³¹³ Eastman Rebuttal, Ex. 750, Page 4, Lines 3-13.

³¹⁴ Eastman Rebuttal, Ex. 750, Page 4, Lines 15-17.

³¹⁵ Eastman Rebuttal, Ex. 750, Page 6, Lines 11-14.

³¹⁶ Eastman Rebuttal, Ex. 750, Page 9-11.

³¹⁷ Eastman Rebuttal, Ex. 750, Page 14, Lines 5-18.

³¹⁸ Transcript, Pages 2878-2880.

³¹⁹ Transcript, Page 2878, Lines 11-20.

48. AmerenUE generally denies that it is overcharging its lighting customers, but concedes that there is no specific cost study to support those rates. That deficiency should be corrected by the completion of such a cost study for the development of rates in the company's next rate case. The Municipal Group claims that pole installation charges are unfair, but could offer nothing other than speculation to prove that contention. Since there is no basis at this time to conclude that the current rates are not justified, the Commission will not eliminate future pole installation charges at this time. But the fairness of those charges should become clearer after completion of the costs study and may be revisited in the next rate case.

49. The record does not indicate the amount of revenue AmerenUE collects from 5M and 6M rates apart from the general lighting revenue numbers. Therefore, the Commission cannot exempt just the 5M and 6M ratepayers from the increased rates that will result from this rate case. However, because no class cost of service study has examined the lighting class since at least the 1980s, the entire class has been given rates that may or may not bear any resemblance to the cost to serve that class. The lighting class is only a small part of AmerenUE's entire customer base, but street lighting is a significant cost for the municipalities that take that service. Under the circumstances, the Commission will exempt the entire lighting customer class from the rate increase that will result from this report and order.³²⁰

50. The lighting class currently generates \$31.295 million in revenue for AmerenUE. The roughly 10.2 percent system average rate increase that will result from this case would

³²⁰ The Municipal Group's alternative proposal to have AmerenUE hold the rate increase collected from the lighting group in escrow, subject to refund, would not be fair to AmerenUE because, if the lighting group's rates were found to be too high, the company would not be able to go back and collect any revenue shortfall after the fact from the other customer classes.

generate an additional \$3.2 million in revenue from the lighting class. AmerenUE shall instead collect that \$3.2 million of revenue from the other rate classes on a pro rata basis.

Conclusions of Law:

There are no additional conclusions of law for this issue.

Decision:

The entire lighting class is exempted from the rate increase that will result from this report and order. The additional revenue that would have been collected from the lighting class under a system average rate increase shall instead be collected from the other rate classes on a pro rata basis. The adjustments necessary to exempt the lighting class shall be made after the general adjustments made pursuant to section 9a of this Report and Order.

IT IS ORDERED THAT:

1. The tariff sheets filed by Union Electric Company, d/b/a AmerenUE on July 24, 2009, and assigned tariff number YE-2010-0054, are rejected.
2. Union Electric Company, d/b/a AmerenUE is authorized to file a tariff sufficient to recover revenues as determined by the Commission in this order. AmerenUE shall file its compliance tariff no later than June 8, 2010.

3. This report and order shall become effective on June 7, 2010.

BY THE COMMISSION

(SEAL)



Steven C. Reed
Secretary

Davis, C., concurs, with concurring opinion to follow,
Jarrett, Gunn, and Kenney, CC., concur,
Clayton, Chm., dissents, with dissenting opinion to follow.
and certify compliance with the provisions
of Section 536.080, RSMo.

Dated at Jefferson City, Missouri,
on this 28th day of May, 2010.

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ormet)
Primary Aluminum Corporation for)
Approval of a Unique Arrangement with) Case No. 09-119-EL-AEC
Ohio Power Company and Columbus)
Southern Power Company.)

OPINION AND ORDER

The Commission, considering the above-entitled application, hereby issues its opinion and order in this matter.

APPEARANCES:

Sonnenschein Nath & Rosenthal LLP, by Clifton A. Vince, Douglas G. Bonner, Daniel D. Barnowski, and Emma F. Hand, 1301 K Street NW, Suite 600 East Tower, Washington, D.C. 20005, on behalf of Ormet Primary Aluminum Corporation.

Richard Cordray, Ohio Attorney General, by Duane W. Luckey, Section Chief, and Thomas Lindgren and Thomas McNamee, Assistant Attorneys General, 180 East Broad Street, Columbus, Ohio 43215, on behalf of the staff of the Public Utilities Commission of Ohio.

Marvin I. Resnik and Steven T. Nourse, American Electric Power Service Corporation, 1 Riverside Plaza, 29th Floor, Columbus, Ohio 43215, on behalf of Columbus Southern Power Company and Ohio Power Company.

Janine L. Migden-Ostrander, Ohio Consumers' Counsel, by Gregory J. Poulos, and Maureen R. Grady, Assistant Consumers' Counsel, Office of Consumers' Counsel, 10 West Broad Street, Columbus, Ohio 43215, on behalf of the residential consumers of Columbus Southern Power Company and Ohio Power Company.

Boehm, Kurtz & Lowry, by David F. Boehm and Michael L. Kurtz, 36 East Seventh Street, Suite 1510, Cincinnati, Ohio 45202, on behalf of Ohio Energy Group.

McNees, Wallace & Nurick, LLC, by Samuel C. Randazzo, Lisa G. McAlister and Joseph M. Clark, 21 East State Street, Columbus, Ohio 43215, on behalf of Industrial Energy Users-Ohio.

Chester, Willcox & Saxbe, LLP, by John W. Bentine, Mark S. Yurick, and Matthew S. White, 65 East State Street, Suite 1000, Columbus, Ohio 43215-4213, on behalf of The Kroger Company.

OPINION:

I. History of the Proceeding

On February 17, 2009, Ormet Primary Aluminum Corporation (Ormet) filed an application pursuant to Section 4905.31, Revised Code, to establish a unique arrangement with the Ohio Power Company and Columbus Southern Power Company (AEP-Ohio) for electric service to its aluminum-producing facility located in Hannibal, Ohio. In its application, Ormet requests that the Commission establish a unique arrangement for electric service with AEP-Ohio that links the price of electricity for its facility for calendar years 2010 through 2018 with the price of aluminum as reported on the London Metal Exchange (LME). Ormet filed an amended application on April 10, 2009, to reflect the possible curtailment of the equivalent of at least two of its six potlines.

On March 9, 2009, Industrial Energy Users-Ohio (IEU-Ohio) filed comments regarding Ormet's application. Further on April 28, 2009, Ohio Energy Group (OEG) and Kroger Company (Kroger) each filed comments regarding Ormet's amended application.

Motions to intervene were filed by AEP-Ohio, IEU-Ohio, OEG, Kroger, and the Ohio Consumers' Counsel (OCC). Those motions were granted by the attorney examiner.

Based upon the comments, the attorney examiner set this matter for hearing. The hearing in this matter commenced on April 30, 2009, and concluded on June 17, 2009. At the hearing, Ormet presented four witnesses, OCC presented three witnesses, and Staff presented one witness. Briefs were filed on July 1, 2009, by Ormet, AEP-Ohio, OCC and OEG, IEU-Ohio, Kroger, and Staff.

II. Discussion and Conclusions

In support of the unique arrangement, Ormet argues that the benefits to the region of keeping Ormet in operation will more than offset the delta revenue paid by other ratepayers. Ormet claims that the undisputed expert testimony in the record of this proceeding demonstrates that, at full operations, Ormet provides \$195 million of benefits to the regional economy (Ormet Ex. 5 at 1).

Ormet also contends that the proposed unique arrangement furthers the policy of the State of Ohio as codified in Section 4928.02, Revised Code. Ormet claims that the

unique arrangement is designed to meet the specific needs of Ormet with respect to the price, terms, conditions, and quality options of electric service as specified by Section 4928.02(B), Revised Code. Further, Ormet claims that the unique arrangement will help Ohio compete in the global economy pursuant to Section 4928.02(N), Revised Code. Ormet contends that it competes in a global market and needs affordable energy in order to compete.

Ormet further contends that it has provided the information needed by the Commission to approve the unique arrangement. Ormet notes that it has provided an affidavit from its chief executive officer verifying the information provided in the application and that it has also provided verifiable data in support of the application.

OCC and OEG claim that Ormet's economic analysis of its impact on the region is flawed because it fails to factor in the negative economic impact on the rest of the state from raising electric rates to pay for the delta revenues (Tr. I at 263, 265). OCC and OEG assert that there will be a clear negative economic impact to requiring all other AEP-Ohio ratepayers to pay increased rates to pay for the delta revenues under the proposed unique arrangement.

IEU-Ohio notes that the Commission may approve a proposed unique arrangement if it is shown to be just and reasonable and that it furthers the policy of this state. However, IEU-Ohio argues that Ormet's application should not be approved. IEU-Ohio claims that there are no clear or reliable indications of how the proposed unique arrangement will produce sufficient beneficial outcomes to make the transfer of revenue responsibility just and reasonable. IEU-Ohio alleges that there are many unanswered questions regarding the proposed unique arrangement, including questions related to the future price of aluminum, the treatment of delta revenue, pending litigation between Ormet and its alumina supplier, Ormet's ability to negotiate a new tolling contract, the sale of significant assets currently owned by Ormet, and the minimum cash requirement associated with labor costs for 2010 and beyond.

The Commission finds that Ormet's application for a unique arrangement should be approved subject to a number of modifications set forth below. The evidence in the record of this proceeding demonstrates that Ormet provides significant economic benefits to the region. Specifically, the evidence demonstrates that Ormet provides \$195 million in total employee compensation and benefits to the regional economy (Ormet Ex. 5 at 1). The evidence also indicates that Ormet is a key employer for the region (Ormet Ex. 5 at 3-4) and that Ormet's operations are responsible, indirectly, for the creation of an additional 2,400 jobs in the region (Tr. 1 at 262-263). Further, the record shows that Ormet's operations generate over \$6.7 million in tax revenue each year (Tr. 1 at 271). Finally, although OCC and OEG, as well as Staff, claim that the increased rates paid by ratepayers

will have a negative economic effect on the state's economy, no party presented evidence in the record which quantified this negative effect (TR. 1 at 264-265).

The Commission notes that, although the proposed unique arrangement covers the period between January 1, 2009 and December 31, 2018, the specific terms and conditions of the unique arrangement are distinctly different for calendar year 2009 than for the remaining years of the unique arrangement. Therefore, the Commission will address the terms related to calendar year 2009 separately.

A. Terms of the Unique Arrangement for Calendar Year 2009

Under the terms of the amended application, for the balance of calendar year 2009, Ormet will pay AEP-Ohio the lesser of the applicable AEP-Ohio tariff rate or \$38.00 per MWh. If Ormet reduced its production by the equivalent of at least two potlines, Ormet's rate would be reduced to the lesser of the applicable AEP-Ohio tariff rate or \$34.00 per MWh. Ormet requests that the rate for 2009 going forward be set at a level that, taking into account the rate that Ormet has been paying to date, would result in an average rate of \$38.00 per MWh for the portion of the year that Ormet was above the four potline operating level and an average rate of \$34.00 per MWh for the portion of the year that Ormet was operating at four potlines or less.

OCC and OEG argue that, while Ormet's proposed unique arrangement for 2009 is reasonable in most respects, the provisions calling for retroactive recovery of discounted rates should be rejected. OCC and OEG note that the proposed unique arrangement requests the Commission make the unique arrangement retroactive to January 1, 2009. OCC and OEG allege that this would result in Ormet receiving discounted rates for electricity that were different from the rates which were approved and in effect at the time the service was delivered. OCC and OEG argue that this would constitute retroactive ratemaking which is prohibited. *Lucas County v. Public Util. Comm.* (1997), 80 Ohio St.3d 344, 348-349. Further, OCC and OEG contend that Ormet should be required to pay AEP-Ohio's economic development rider. OCC and OEG note that this rider is unavoidable and that Ormet should pay this rider just like all other customers.

Finally, OCC and OEG claim that the proposed unique arrangement for 2009 is unreasonable and unlawful because it provides compensation to AEP-Ohio for its POLR responsibilities when Ormet cannot shop under the contract. OCC and OEG claim that, because AEP-Ohio will not incur any risk that Ormet would leave and come back to system and seek service when the market makes it more economical, AEP-Ohio should not assess a POLR charge on Ormet, and ratepayers should not pay any discount which compensates AEP-Ohio for a non-existent POLR risk for this consumer.

AEP-Ohio argues that the Commission should not reopen its prior approval of the temporary amendment to the 2007-2008 contract between Ormet and AEP-Ohio. This temporary amendment was approved by the Commission effective January 1, 2009. AEP contends that, if the Commission approves the proposed unique arrangement, the unique arrangement should be effective on a prospective basis only because an earlier effective date would violate the terms of the temporary amendment.

Staff notes that Ormet's rate for 2009, the first year of the agreement, would be fixed at either \$38 per MWh or \$34 per MWh, depending on the number of potlines in operation (OCC Ex. 3 at 6-7). Although Staff had previously recommended that the Commission bifurcate this proceeding and address calendar year 2009 separately, Staff recommends Commission approval of the terms for the first year of the unique arrangement.

The Commission finds that the terms of the unique arrangement for 2009 should be approved subject to the following modifications. With respect to price, the Commission orders AEP-Ohio to bill Ormet, for the balance of 2009, at a rate which, for all of calendar year 2009, averages \$38.00 per MWh for the periods when Ormet was in full operation (i.e., six potlines), \$35.00 per MWh for the periods when Ormet curtailed production to 4.6 potlines, and \$34.00 per MWh for the periods when Ormet curtailed production to 4 potlines. This rate will ensure that Ormet will receive the benefits of the rates proposed for calendar year 2009 in its amended application without bifurcating the proceeding as originally proposed by Staff. Further, this rate is contingent upon Ormet maintaining employment levels at 900 employees for calendar year 2009 pursuant to Ormet's representations in the record of this proceeding (Ormet Ex. 11A at 5-6; Tr. III at 425).

However, with respect to the delta revenue for 2009, the Commission believes further proceedings are necessary regarding the recovery of delta revenues by AEP-Ohio for calendar year 2009. Therefore, the Commission authorizes AEP-Ohio to defer the delta revenues created by the unique arrangement for the remainder of calendar year 2009, and the Commission directs AEP-Ohio to file an application to recover the appropriate amounts of the deferrals authorized by the Commission in Case No. 08-1338-EL-AAM and the delta revenues for calendar year 2009.

The approved unique arrangement shall be effective for services rendered following the filing in this docket of an executed power agreement which conforms to the modifications ordered by the Commission in this Opinion and Order. Although the power agreement shall be effective for services rendered after the filing of an executed power agreement, the Commission retains the right, upon review of the executed power agreement, to order further revisions to the power agreement in order to ensure that the power agreement conforms to the modifications of the proposed unique arrangement ordered by the Commission in this Opinion and Order.

B. Terms of the Unique Arrangement for Calendar Years 2010 through 2018

For calendar years 2010 through 2018, the rate Ormet will pay under the proposed unique arrangement will be determined based upon schedules filed each year with the Commission. Each schedule would include an "indexed rate" and a "target price." The indexed rate would be the rate that Ormet could pay to produce the minimum cash flow necessary to sustain operations and pay its required legacy costs depending upon the LME price of aluminum. The target price will be the projected average price of aluminum for the calendar year as reported on the LME at which Ormet would be able to pay the AEP-Ohio tariff rate and still maintain the minimum cash flow necessary to maintain its operations and pay its required legacy costs. Under the proposed unique arrangement, the Commission may require an independent third-party review of each year's schedule at Ormet's expense.

When the LME price of aluminum is less than or equal to the target price, Ormet will pay the indexed rate. When the LME price of aluminum is greater than the target price, but not more than \$300 per tonne above the target price, Ormet will pay 102 percent of the AEP-Ohio tariff rate. When the LME price is greater than \$300 per tonne than the target price, Ormet will pay 105 percent of the AEP-Ohio tariff rate. At the end of each year, there will be a true-up to reconcile the projected LME prices for the year with the actual LME prices.

With respect to the terms of the unique arrangement for calendar years 2010 through 2018, intervenors in this proceeding and Staff have raised a number of specific arguments related to: (1) the proposed discount and delta revenue recovery; (2) potential delta revenue credits; (3) POLR charges; (4) deposit and advance payment requirements; and (5) the need for future review of the proposed unique arrangement. Although the Commission will approve the proposed unique arrangement, the Commission will order a number of modifications to the unique arrangement in order to address the issues raised by intervenors and Staff.

1) Proposed Discount and Delta Revenue Recovery

IEU-Ohio argues that the unique arrangement, if approved, would impose an excessive burden on other customers of AEP-Ohio. IEU-Ohio claims that, under the pricing formula contained in the proposed unique arrangement and assuming an AEP-Ohio tariff rate of \$44.24 per MWh, Ormet would need to sell aluminum at \$2,843 per tonne to avoid creating delta revenues; however, if Ormet sold aluminum in 2010 at \$1,602 per tonne, which was the LME forward price as of April 29, 2009, delta revenues would amount to \$283 million (OEG Ex. 1; OEG Ex. 6).

Likewise, OCC and OEG claim that the proposed unique arrangement is unreasonable because it fails to limit the delta revenues that ratepayers could be asked to pay. OCC and OEG note that any LME price less than \$2,200 per tonne will result in Ormet being paid, in the form of a credit on its bill, to use electricity (Tr. I at 153; Tr. II at 297). As of May 1, 2009, the LME futures price for July 2010 was \$1,602 per tonne (Tr. I at 150-155). OCC and OEG claim that, if the futures price for July 2010 accurately reflects the actual LME price for July 2010, Ormet will be paid \$77.1 million to use power in 2010 (Tr. I at 153). OCC and OEG contend that there is no basis in law for the proposed unique arrangement and that Ormet has failed to provide any credible legal justification for requiring ratepayers to pay cash to a company beyond discounting rates to zero dollars. Therefore, OCC and OEG conclude that the proposed unique arrangement would not be reasonable without an appropriate floor for the rate Ormet will pay.

OCC and OEG note that, although the total impact of wages on the states of Ohio, West Virginia and Pennsylvania, if Ormet were to close, would be \$195 million per year (Ormet Ex. 8 at 4), half of the employees and retirees identified in the amended application reside in Pennsylvania and West Virginia (Ormet Ex. 5 at 5), and a substantial amount of the tax revenues received from Ormet goes to West Virginia (Ormet Ex. 5 at 11-12). Thus, OCC and OEG conclude that Ormet's economic study should be discounted by 42 percent before it can be considered a relevant study on the Ohio economic impact of a potential closing by Ormet. OCC and OEG note that Staff recommended in the hearing that the amount of the rate discount be limited to \$54 million per year and that the discount be phased out over the term of the contract (Staff Ex 2 at 3). However, OCC and OEG maintain that the limit should not exceed \$32 million, the amount of wages of the Ohio workers at the Ormet plant.

Kroger argues that, when considering a proposed unique arrangement, the Commission must balance all costs of the proposed arrangement with the benefits of assuming those costs. Further, Kroger contends that, in order to avoid exposing ratepayers to unreasonable and unlimited risk, any unique arrangement approved by the Commission in this proceeding should include reasonable protections for AEP-Ohio ratepayers. Kroger believes that the reasonable protections should include a definitive limit on the cost that ratepayers are required to pay, by either limiting the discount Ormet receives to a certain percentage below AEP-Ohio's tariff rates or placing a dollar limit on the amount of delta revenues AEP-Ohio may recover annually from the unique arrangement.

AEP-Ohio believes that the amount of any discount to be provided to Ormet is a matter for the Commission's judgment. However, AEP-Ohio claims that, under Section 4905.31(E), Revised Code, AEP-Ohio must be provided full recovery of all delta revenues under the unique arrangement because the statute specifies that all costs of an economic

development program or job retention program are recoverable by an electric utility, including all "revenue forgone."

Ormet claims that the potential harm predicted by the intervenors in this proceeding is speculative and based upon an unlikely worst case scenario. Ormet contends that the delta revenue calculations by OCC and OEG are based upon the erroneous assumption that current LME forward prices are reliable predictors of future LME prices and that future LME prices are likely to stay below \$1,941 per tonne (OCC Ex. 3 at 11-12). However, Ormet contends that a more reliable projection predicts that aluminum prices will be near \$2,000 per tonne by the end of 2009 (Ormet Ex. 9 at 1; Tr. I at 173-174). Ormet also claims that there are several additional factors that will lower its costs, and the need for rate discounts, over time; these factors include deleveraging through the proceeds raised by asset sales and internally-generated cash (Ormet Ex. 7 at 2), and reductions in Ormet's pension contributions beginning in 2013 (Tr. III at 434-436).

Staff argues that any unique arrangement approved by the Commission should contain a floor and a ceiling. The Staff believes that a price floor, below which a customer's payments cannot go, reflects the need to maintain the customer's incentive to operate efficiently and effectively. Staff maintains that a maximum reduction of 25 percent from the tariff rate is the appropriate balance, keeping the customer focused on efficiency but providing temporary assistance as well (Staff Ex. 2). This floor would result in a maximum rate discount of \$54 million.

In addition, Staff argues that there should be a ceiling on the amount of delta revenue to be recovered from other ratepayers. Staff notes that the benefits of unique arrangements to other ratepayers are limited and that the ability of other ratepayers to pay for delta revenues is likewise limited. Staff believes that the primary benefit of the unique arrangement is the potential preservation of jobs in Ohio; thus, Staff argues that the cap on annual delta revenue recovery should be set initially at \$54 million, which is the amount of Ormet's payroll. In addition, Staff recommends that the amount of any discount be reduced by 11 percent of the initial discount each year during the term of the unique arrangement.

Ormet argues that the \$54 million cap proposed by Staff is insufficient. Although Ormet believes that the aluminum market will rebound, Ormet claims that this market is highly volatile and that any cap must address this volatility (Ormet Ex. 6 at 6-7). Ormet maintains that the \$54 million cap proposed by Staff is inadequate given the volatility of the aluminum market. Ormet claims that, if the discount in any given year is not sufficient to keep Ormet in business, then the entire contract will fail and Ormet will likely need to curtail production at its Hannibal facility.

Moreover, Ormet contends that Staff's proposed cap is unreasonable and speculative. Ormet believes that Staff's proposed cap fails to consider what Ormet needs to operate or to balance the costs of discounts against Ormet's benefits to this state. Ormet also claims that Staff has provided no support for its position that a maximum reduction of 25 percent from the tariff rate is appropriate. Further, Ormet contends that Staff has not demonstrated that its proposed \$54 million cap would enable Ormet to remain in business for the years 2010 through 2019.

The Commission agrees with Staff's position that, generally, unique arrangements must contain a floor, a minimum amount that the party seeking a unique arrangement should be required to pay, and a ceiling, a maximum amount of delta revenue which the ratepayers should be expected to pay. Ormet represents that it does not oppose the application of a cap or floor to its contract (Ormet Brief at 21).

With respect to a floor, Ormet proposes a number of different methods for establishing a floor, with a range of \$93 million to \$114 million as the maximum discount from tariff rates. This range includes the variable costs of production of the electricity consumed by Ormet, which testimony indicates would be approximately \$90 million (Tr. I at 235; Staff Ex. 2A, Tr. IV. at 478-479, 491-492). On the other hand, Staff has proposed a floor in which Ormet would receive a maximum discount from tariff rates of \$54 million. OCC and OEG propose a floor of \$32 million, based upon the total wages paid to Ormet's employees who reside in this state.

Based upon the record in this case, the Commission finds that Ormet's rate should be determined as proposed in the unique arrangement, but with a floor, or maximum discount from tariff rates. Although the Commission does not agree with Staff's recommendation on the amount of the floor, this floor should be implemented in the manner proposed by Staff at the hearing (Staff Ex. 2). Moreover, the Commission is not persuaded by the arguments presented by OCC and OEG that the Commission should consider only the Ohio portions of the regional economy. All of the jobs which would be retained under the proposed unique arrangement are located in this state irrespective of where the employees reside. Further, neither OCC nor OEG presented any economic analysis regarding how much of the indirect benefits of Ormet's continuing to remain in operation advantage the residents of this state as opposed to other states.

Therefore, the Commission will modify the proposed unique arrangement to set the maximum rate discount at \$60 million for calendar years 2010 and 2011. The Commission has based the floor upon the variable costs of production of the electricity consumed by Ormet at full capacity, which the testimony at hearing indicates would be approximately \$90 million. However, testimony in the record also indicates that, at the time of the hearing, Ormet was in the process of curtailing production to 4 potlines (Tr. 1 at 70-71). This curtailment of operations should reduce Ormet's demand for electricity by

approximately one-third; therefore, the Commission has reduced the estimate of the variable costs of production of the electricity of \$90 million by one-third to \$60 million. The Commission finds that this is an appropriate floor or maximum discount for Ormet. This floor will be subject to two adjustments: a flexible phase down and a reduction in the discount due to reductions in employment, both of which will be discussed below.

With respect to the ceiling, or the maximum amount ratepayers should be expected to pay in any given year, the Commission agrees with Staff and the intervenors that the ability of ratepayers to fund the recovery of delta revenues is not unlimited. Ormet contends that the Staff has not offered proof for its recommendation of what ratepayers can afford to pay. However, Ormet, not Staff nor the intervenors, has the burden of proof in this proceeding, and it is Ormet that has failed to present evidence contravening the Staff's expert testimony, which was based upon substantial experience in relevant utility matters in this state (Staff Ex. 1 at 1; Tr. II at 336-338; Tr. IV at 505). Therefore, the Commission will adopt Staff's recommendation of \$54 million as the maximum amount of delta revenue which ratepayers should be expected to pay in a given year.

However, this will result in a potential differential of up to \$6 million per year between the \$60 million maximum discount from tariff rates for Ormet and the \$54 million maximum in delta revenues which ratepayers can be expected to pay. AEP-Ohio will be authorized to defer this differential, with carrying costs equal to AEP-Ohio's long term cost of debt, during the term of the unique arrangement. During this time, all delta revenue credits attributable to above-tariff payments by Ormet, to be calculated as discussed below, will be first applied to reduce or eliminate the deferral and carrying charges before being applied to AEP-Ohio's economic development rider. At the end of the term of the unique arrangement, AEP-Ohio will be permitted to recover any remaining deferred amounts, including carrying charges, through its economic development rider.

With respect to the adjustments to the floor, or maximum rate discount, the Commission agrees with Staff's recommendation that the unique arrangement be modified to phase down the discount over time. Ormet represents that there are several additional factors that will lower its costs, and in turn the need for rate discounts, over time; these factors include deleveraging through the proceeds raised by asset sales and internally-generated cash (Ormet Ex. 7 at 2) and reductions in Ormet's pension contributions beginning in 2013 (Tr. III at 434-436, 457-458). Therefore, although the \$60 million floor will be in effect for calendar years 2010 and 2011, the Commission finds that, for calendar year 2012, the floor should be reduced to \$54 million; for calendar years 2013 through 2018, the remaining six years of the contract, the floor should be reduced each year by \$10 million, until it phases out completely for calendar year 2018.

The Commission also acknowledges that the aluminum market is subject to a great deal of volatility and that the unique arrangement should address that volatility.

Therefore, for calendar year 2013 through 2018, Ormet may elect to use, in the current year, any unused portion of the floor from a previous year (or years). Ormet shall apply this election by providing written notice to AEP-Ohio and by filing such notice in this docket. For example, if, due to LME prices in 2014, Ormet only uses a discount of \$28.75 million, leaving \$6 million of the 2014 discount unused, Ormet may elect to increase the floor in calendar year 2015 (or 2016 through 2018) by the \$6 million unused discount. In no event will an adjusted floor be permitted to exceed \$54 million in any year between 2013 and 2018. This should assist Ormet in weathering any short-term swings in the LME market while ensuring that the floor, or maximum rate discount, phases out over the duration of the unique arrangement.

Second, the Commission notes that the primary purpose of the unique arrangement is to retain jobs rather than to boost worldwide aluminum production or to enrich Ormet's investors. Any rate discounts provided to Ormet must be directly related to Ormet maintaining certain levels of employment. The record in this case demonstrates Ormet cannot continue to employ 900 employees beyond 2009 with curtailed production (Tr. III at 425). Therefore, under the unique arrangement, Ormet will be required to maintain an employment level of full-time employees of 650. Ormet will be required to provide a monthly report to Staff and AEP-Ohio detailing its employment levels. The floor will be reduced each month by \$10 million for every 50 employees below 650 full-time employees that were employed by Ormet for the previous month. This reduction will be in addition to any planned phase down of the floor discussed above.

2) Potential Delta Revenue Credits

Kroger argues that the unique arrangement must provide for a greater share in the benefits for AEP-Ohio ratepayers in the event that aluminum prices rise above the target price. Kroger claims that ratepayers are being asked to bear the risk of declining aluminum prices and, therefore, should receive a reasonable return in the event that aluminum prices rebound. Kroger does not believe that a potential five percent gain is sufficient to compensate ratepayers for these risks.

OCC and OEG also allege that, under the proposed unique arrangement, AEP-Ohio's ratepayers bear great risks related to the price of aluminum while receiving little benefit if the price of aluminum rises. OCC and OEG cite to the testimony of OCC witness Ibrahim that the proposed unique arrangement lacks symmetry regarding the risks and benefits born by AEP-Ohio's customers (OCC Ex. 3 at 14-15). OCC and OEG claim that, if aluminum prices double from the price when Dr. Ibrahim filed his testimony, the possible benefit to AEP-Ohio's ratepayers would only be \$3.6 million to \$8.9 million (OCC Ex. 3 at 15). On the other hand, if the futures price for July 2010 accurately reflects the actual LME price for July 2010, Ormet will be paid \$77.1 million to use power in 2010 and ratepayers would be responsible for delta revenues of \$281.1 million. OCC and OEG contend that

this asymmetry is extremely disadvantageous to AEP-Ohio's ratepayers because these ratepayers will bear huge risks for delta revenues while the benefits are extremely unlikely and minimal compared to the risks. Consequently, OCC and OEG recommend that a reasonable symmetry would require Ormet to pay a rate that exceeds the tariff rate by \$0.049 per MWh times 50 percent for each \$1 per tonne when the actual LME price exceeds the target price. AEP-Ohio would receive delta revenue credits for the amount that Ormet pays in excess of tariff rates with a maximum delta revenue credit cap of \$16.35 million per year.

Ormet contends that the proposed unique arrangement is designed to assure that Ormet is not unreasonably benefitted at the expense of AEP-Ohio's ratepayers. Ormet notes that the unique arrangement is designed to impose the minimum burden on ratepayers by providing for the minimum cash flow necessary to keep its Hannibal facility in operation and pay its required legacy costs; the unique proposed arrangement does not guarantee that Ormet will earn a profit or a particular rate of return. Further, Ormet notes that it has voluntarily offered to pay above-tariff rates when the LME price of aluminum is greater than the target price.

The Commission finds that the unique arrangement, as filed, contains insufficient potential benefits to ratepayers in relation to the risks which Ormet proposes the ratepayers bear. Further, the Commission notes that the record indicates that Ormet will be able to substantially reduce its pension fund obligations beginning in the future (Tr. III at 434-436). However, the Commission finds that this can be addressed by increasing the amounts that Ormet will pay when LME prices exceed the LME target price. Therefore, beginning in 2012, if the LME price is greater than the LME target price, but not more than \$300 above the LME target price, Ormet will pay 104 percent of the AEP-Ohio tariff rate rather than 102 percent of the AEP-Ohio tariff rate. Assuming full operations at Ormet's facility, this will increase the Ormet's potential contribution to delta revenue credits to approximately \$8.74 million per year from \$4.37 million. Further, if the LME price is greater than \$300 above the LME target price, Ormet will pay 108 percent of the AEP-Ohio tariff rate rather than 105 percent of the AEP-Ohio tariff rate. This will increase Ormet's potential contribution to delta revenue credits to approximately \$17.48 million per year from \$10.91 million.

The Commission finds that any amounts paid by Ormet in excess of AEP-Ohio's tariff rates should be considered as delta revenue credits. AEP-Ohio is directed to apply the delta revenue credits first to any deferred amounts, including carrying charges, of delta revenues. Any remaining delta revenue credits should be applied to AEP-Ohio's *economic development rider*.

3) POLR Charges

OCC and OEG claim that the proposed unique arrangement is unreasonable and unlawful because it compensates AEP-Ohio for POLR charges when Ormet cannot shop under the unique arrangement. Under terms of the proposed unique arrangement, AEP-Ohio would be the exclusive supplier to Ormet's Hannibal facility (Ormet Ex. 8, Attachment A at 8-9; Tr. I at 37; Tr. IV at 484). OCC and OEG reason that, since there is no risk that Ormet will shop generation service while the contract is in effect, there is no risk to AEP-Ohio that it will be called to serve as Ormet's provider-of-last-resort; therefore, a POLR charge should not be assessed upon Ormet, and the other ratepayers should not pay delta revenues for POLR charges.

Kroger also contends that POLR charges should be excluded from the amount of delta revenues recovered by AEP-Ohio. Kroger reasons that, because Ormet will be contractually obligated to receive electricity from AEP-Ohio under the proposed unique arrangement, there is no risk to AEP-Ohio that Ormet will purchase electricity from an alternative electric service supplier. Kroger claims that, under the proposed unique arrangement, AEP-Ohio would still receive compensation for being the POLR supplier without incurring POLR costs. Further, Kroger believes that AEP-Ohio should be required to share the cost of any discount to Ormet since AEP-Ohio benefits financially from continued Ormet operations.

AEP-Ohio argues that the POLR charges authorized in its electric security plan should not be reduced. AEP-Ohio notes that the policy of the State is to promote competitive generation markets and customer choice. Section 4928.02, Revised Code. AEP-Ohio believes that any Commission order keeping Ormet's load out of the competitive markets for ten years would conflict with that policy. Further, AEP-Ohio contends that the Commission has already determined, in its electric security plan proceeding, that a customer should not be able to give up its statutory right to obtain service from a competitive supplier in exchange for avoiding the POLR charge. Instead, the only opportunity for a customer to avoid the POLR charge is to switch to a competitive supplier and agree to pay market rates for generation upon any return to the electric utility. *In re Columbus Sothern Power Co. and Ohio Power Co.*, Case No. 08-917-EL-SSO et al., Opinion and Order (March 18, 2009) at 40.

The Commission finds that, under the terms of the unique arrangement, AEP-Ohio will be the exclusive supplier to Ormet (Tr. I at 37-38; Tr. IV at 484). Therefore, there is no risk that Ormet will shop for competitive generation and then return to AEP-Ohio's POLR service. If AEP-Ohio were to retain these charges, AEP-Ohio would be compensated for a service it would not be providing. Moreover, our decision in the AEP-Ohio electric security plan is inapplicable to this case because that holding addressed customers receiving service under AEP-Ohio's standard service offer rather than a customer

receiving service under a unique arrangement specifically approved by the Commission. Therefore, the Commission finds that the unique arrangement should be modified such that any POLR charges paid by Ormet are used to reduce the AEP-Ohio's ratepayers' obligations under the unique arrangement. During the term of the unique arrangement, AEP-Ohio shall credit any POLR charges paid by Ormet to its economic development rider in order to reduce the impact of the unique arrangement on other ratepayers' bills.

4) Deposit and Advance Payment Provisions

IEU-Ohio observes that the proposed unique arrangement would shift all risk of a potential default by Ormet to AEP-Ohio's customers by relieving Ormet of its current obligation to provide a security deposit as long as AEP-Ohio is permitted to treat any defaulted amounts as delta revenue to be recovered from its customers (Ormet Ex. 8, Attachment A at 14). IEU-Ohio argues that there is no real offset to the costs as a result of shifting the default risks to the other ratepayers and that this is part of the excessive burden placed upon AEP-Ohio's ratepayers under the proposed unique arrangement.

Ormet claims that all it is seeking with respect to deposit and advance payment terms is a return to standard tariff terms (Tr. I at 124, 227). Ormet believes that these terms will benefit AEP-Ohio's other ratepayers. Ormet notes that the calculation of the rate that Ormet can afford to pay is based on the assumption that the cash deposit currently held by AEP-Ohio will be returned to Ormet, thereby increasing its cash flow. If this deposit is not returned, it will result in increasing the magnitude of the discount required and in increasing the delta revenues to be collected from ratepayers. Thus, Ormet claims that, if the deposit is returned, the certainty of lower delta revenues would offset any potential risk of default.

AEP-Oho argues that the provisions in the proposed unique arrangement regarding waiver of deposit and advanced payment should not be modified. AEP avers that any modification would jeopardize the ability of AEP-Ohio to recover any unpaid amounts.

The Commission finds that the provisions related to deposit and advance payments should not be modified. The record clearly demonstrates that these provisions are an essential element of the proposed unique arrangement (Ormet Ex. 11A at 3, 4). Further, the record also demonstrates that Ormet has curtailed its operations, which will result in less ratepayer exposure to the risk of default by Ormet.

5) Future Review of the Proposed Unique Arrangement

In addition, IEU-Ohio claims that the proposed unique arrangement would prohibit the Commission and other stakeholders from seeking to modify the unique arrangement, except in very limited circumstances, while allowing Ormet to request modifications that

would further benefit Ormet. Likewise, OCC and OEG claim that the proposed unique arrangement would unlawfully limit the Commission's jurisdiction to review and modify the agreement. Kroger also states that the Commission must have the ability to periodically review and, if necessary, modify the unique arrangement. Further, Kroger claims that ten years is an unreasonable amount of time to expose ratepayers to the risk and cost of a unique arrangement; thus there must be a reasonable time limit on the unique arrangement. Staff agrees that there should be some limit upon the length of the unique agreement. Thus, Staff believes that there should be periodic reviews of whether the unique agreements should continue.

The Commission believes that the provisions contained in the proposed unique arrangement for future review will be adequate to safeguard ratepayers from undue risks if supplemented by an additional, independent provision. The Commission notes that Ormet has repeatedly, throughout this proceeding, represented to the Commission its belief that, in the long-term, LME prices will recover sufficiently for Ormet to profitably operate. Ormet has disparaged the use of futures prices by OCC and OEG to predict future LME prices and has argued instead that the Commission should rely instead upon an analyst report which predicts a future rise in LME prices (Ormet Ex. 9 at 14).

Therefore, the Commission will modify the unique arrangement to provide an additional, independent, termination provision in the event that long-term LME prices do not recover as Ormet predicts. The Commission, above, has determined that, for calendar years 2010 and 2011, AEP should be permitted to defer for future recovery the differential between the floor, or maximum discount, of \$60 million and the ceiling of \$54 million. The Commission will modify the proposed unique arrangement to allow the Commission to terminate, by order, the unique arrangement if Ormet does not begin to reduce the amount of the accumulated deferrals, and carrying charges, through the payment of above-tariff rates, pursuant to the terms of the unique arrangement, by April 1, 2012. The Commission specifically notes that the crediting of POLR charges by AEP in the form of delta revenue credits shall not constitute the payment of above-tariff rates by Ormet for purposes of this termination provision. Unless otherwise ordered by the Commission, such termination shall be effective immediately upon issuance of a Commission order terminating the unique arrangement.

FINDINGS OF FACT AND CONCLUSIONS OF LAW:

- (1) On February 17, 2009, Ormet filed an application pursuant to Section 4905.31, Revised Code, to establish a unique arrangement with AEP-Ohio for electric service to its aluminum-producing facility located in Hannibal, Ohio.

- (2) Ormet filed an amended application on April 10, 2009.
- (3) Comments regarding Ormet's application and amended application were filed by IEU-Ohio, OEG, and Kroger.
- (4) Based upon the comments, the attorney examiner set this matter for hearing before the Commission.
- (5) The hearing in this matter commenced on April 30, 2009, and concluded on June 17, 2009.
- (6) The amended application is reasonable and should be approved as modified by the Commission.

ORDER:

It is, therefore,

ORDERED, That the amended application for a unique arrangement filed by Ormet be approved as modified by the Commission. It is, further,

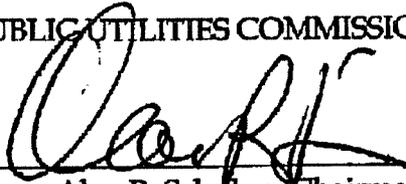
ORDERED, That Ormet and AEP-Ohio file an executed power agreement in this docket that conforms to the modifications ordered by the Commission. It is, further,

ORDERED, That the approved unique arrangement shall be effective for services rendered following the filing in this docket of an executed power agreement. It is, further,

ORDERED, That AEP-Ohio be authorized to defer delta revenues for the remainder of calendar year 2009 and for calendar years 2010 and 2011, to the extent set forth in this Opinion and Order. It is, further,

ORDERED, That a copy of this Opinion and Order be served upon all parties of record.

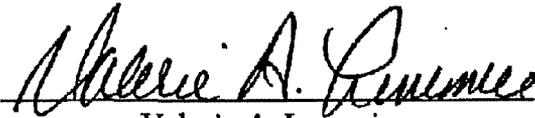
THE PUBLIC UTILITIES COMMISSION OF OHIO



Alan R. Schriber, Chairman

Paul A. Centolella

Ronda Hartman Fergus



Valerie A. Lemmie

Cheryl L. Roberto

GAP:ct

Entered in the Journal

JUL 15 2009



Renee J. Jenkins
Secretary

**PUBLIC SERVICE COMMISSION
OF WEST VIRGINIA
CHARLESTON**

At a session of the Public Service Commission of West Virginia, in the City of Charleston, on the 26th day of July, 2006.

CASE NO. 05-1278-E-PC-PW-42T

APPALACHIAN POWER COMPANY and
WHEELING POWER COMPANY, both dba
AMERICAN ELECTRIC POWER

Rule 42T application to increase electric rates and charges; request for reactivation and modification of the Expanded Net Energy Cost mechanism; proposal for the disposition of Appalachian Power Company's ENEC over-recovery balance; request for implementation of a System Reliability Tracker mechanism; and request for waiver of certain provisions of the Commission's Rules.

COMMISSION ORDER

The Commission approves the Stipulation.

BACKGROUND

On August 26, 2005, Appalachian Power Company and Wheeling Power Company, both doing business as American Electric Power (AEP), filed a tariff containing increased rates and charges for furnishing electric service to approximately 474,965 customers. The initial proposed increased rates and charges were to become effective September 25, 2005.

In addition to the rate application, the joint application included (1) a request for approval to reactivate and modify the Expanded Net Energy Cost mechanism (ENEC); (2) approval of a proposal for the disposition of Appalachian Power Company's ENEC over-recovery balance; (3) approval to implement a System Reliability Tracker mechanism; and (4) a waiver of certain provisions of the Commission's rules: Rule 4.2.1.a. - waiver of refund requirement with respect to all non-residential customers; 4.8.1.a.F. - waiver of the 8-hour reconnect requirement; and 4.8.1.a.H. - waiver to avoid dangers associated with reconnect personnel acceptance and transportation of money.

On September 13, 2005, the Commission issued an order suspending the use of the rates and charges stated in the revised tariff sheets until 12:01 a.m., June 23, 2006, unless otherwise ordered by the Commission.

On November 10, 2005, the Commission issued an order that, among other things, set this matter for hearing to begin on February 28, 2006, and established a procedural schedule.

The following parties were granted intervenor status: the Commission's Consumer Advocate Division (CAD), the West Virginia Energy Users Group (WVEUG), Century Aluminum (Century), South Bluefield Neighborhood Association (SBNA), West Virginia Building and Construction Trades Council (Trades Council), Concept Mining, Inc. (Concept), The Kroger Co. (Kroger), Huntington Sanitary Board (Huntington), South Putnam Public Service District (South Putnam), and West Virginia Community Action Partnership (WVCAP). (See Orders dated November 10, 2005, and December 7, 2005).¹

At AEP's request, the Commission issued an order on January 27, 2006, that tolled the statutory suspension period for five (5) weeks, from June 23, 2006, until July 28, 2006. The order rescheduled the hearing, including public comments, to begin on April 18, 2006, and established a new procedural schedule.

Public comment hearings were scheduled and conducted in Beckley, Logan, Huntington, and Bluefield between February 6, 2006, and February 15, 2006.

In accordance with the schedule established by the Commission, AEP, Commission Staff (Staff), CAD, Century, WVEUG, Kroger, South Putnam, Huntington, and WVCAP submitted pre-filed testimony in advance of the hearing.

On April 18, 2006, the Commission convened the hearing as scheduled. AEP, Staff, CAD, Century, WVEUG, Kroger, South Putnam, Huntington, and WVCAP appeared and were represented by counsel. There were no members of the public present to provide comments.

After a short recess in the proceedings, the parties advised the Commission that they had reached a settlement, in principle, on a majority of the issues in the case. The parties indicated that a rate issue involving Century was still open for further discussion and

¹Although Concept and the Trades Council had been granted intervenor status, both subsequently withdrew as parties to the case. Other than an appearance at the February 15, 2006 public comment hearing, SBNA did not participate in any other aspect of this case.

negotiation. The Commission directed the parties to reduce the settlement to writing. The parties were to reappear and submit the written settlement agreement to the Commission on April 21, 2006.

Prior to adjourning the hearing, the parties submitted into evidence the pre-filed testimony of various witnesses. (*See*, Exhibits contained in hearing transcript of April 18, 2006).

The hearing reconvened on April 21, 2006. At that time, the parties were not prepared to present a written settlement. The parties were directed to return on April 24, 2006, to either submit a written settlement or to proceed with the evidentiary hearing.

On April 24, 2006, the parties appeared before the Commission and announced that a Joint Stipulation and Agreement for Settlement (Stipulation) had been signed by the parties. The Stipulation was entered into evidence. (*See*, Joint Exhibit 1). The parties explained the Stipulation on the record and indicated that it resolved all issues except for the Special Rate Mechanism for Century Aluminum (Century Rate). The Century Rate proposal is set out in paragraph 37, pp. 14-16 of the Stipulation. Staff was the only party not in agreement with that aspect of the Stipulation.

The parties were instructed to file briefs supporting their respective positions on the Century Rate.

On April 24, 2006, AEP filed affidavits indicating that the required notices were published, posted and mailed in accordance with the Commission's orders and *Tariff Rules*.

Initial Briefs

Staff

Staff filed its Initial Brief on May 4, 2006. Staff reiterated that it was in agreement with all terms and conditions of the Stipulation with the exception of the Century Rate aspect. Additionally, Staff agreed that Century is a valuable industrial asset to the citizens of West Virginia and that Century provides much-needed jobs.

Nonetheless, Staff argued that the Commission is not statutorily authorized to authorize a special utility rate for certain energy-intensive industries. Staff cited *W. Va. Code* §§ 24-1-1(a)(4); 24-1-1(c); 24-2-2(a); 24-2-3; 24-2-7(a); 24-3-1; and 24-3-2 in support of its position.

Staff stated that the Commission had previously rejected a request that a special sewer rate be created for housing projects for the low income and/or the elderly. (*Jefferson County Public Service District*, Case No. 00-1329-PSD-19A, Recommended Decision entered March 9, 2001, final March 29, 2001, citing *Hope Gas Co.*, Case No. 82-158-G-42T (Hearing Examiner's Decision entered 1/11/83), Supplement to Vol. 70 ARPSCWV 1982-1983.)

Conversely, Staff acknowledged that in a separate case, the Commission had previously approved a settlement that did "not preclude AEP-APCo or AEP-WPCo from entering into special contracts for specific customers that provide for rates different from those contained in the companies' tariffs, or from seeking Commission approval of new or experimental rates of limited application. (*Appalachian Power Co.*, Case No. 99-0409-E-GI, June 2, 2000, at p. 8).

Staff made two observations with regard to its experience with special contracts and experimental rates. First, Staff stated that when a utility and a customer enter into a special contract under which the customer will be paying a rate that is less than the rate of the customer's class rate, the special rate is generally cost-based and beneficial to the utility and its other customers. (*See, Wheeling Power Company*, Case No. 90-243-E-42T, Commission order February 15, 1991, citing *Wheeling Electric Company*, Case No. 86-587-E-42, Commission order, August 5, 1988, discussing the benefits of having a special interruptible rate for electric service).

Staff's second observation regarding the use of special contracts filed pursuant to Rule 39 of the Commission's *Tariff Rules* is that special contracts are not approved in the manner requested in the Stipulation. Staff stated that the Commission has in the past declined to approve the specific terms and conditions of special contracts. However, the Commission has stated that it would review disputes over allegations of imprudence which may be made. (*See, Mountaineer Gas Co.*, Case No. 94-0895-GT-PC, Commission order June 1, 1995, *petition to reconsider denied*, Commission order July 28, 1995).

Staff indicated that there was "one glaring exception" to the Commission's policy of declining to approve the specific terms and conditions of a special contract. That exception is found in *Appalachian Power Company and American Alloys, Inc.*, Case No. 87-883-E-PC, Commission order December 24, 1987). In that case Staff stated that the Commission approved the special contract which provided for APCo charging American Alloys a lower deposit rate than that required by the Commission's *Electric Rules*. The Commission concluded that APCo would be permitted in future rate cases to recover any loss which it may experience by accepting less than the maximum allowed security deposit. Staff asserted that it was unaware of any statutory provision that would authorize the Commission to

guarantee a preferential rate treatment by permitting APCo to recover from its other ratepayers any loss it incurred as the result of American Alloys being given permission to pay a deposit less than required by the *Electric Rules*.

CAD

On May 4, 2006, CAD filed its Initial Brief. CAD advocated for the approval of the Stipulation, including the Century Rate provisions.

CAD stated that Century would bear a substantial amount of the costs related to the overall revenue increase agreed to in the Stipulation. (Stipulation, Ex. E). CAD explained that under the three-year Century Rate proposal, Century will pay a base rate each month to AEP equal to the currently effective rate, plus a surcharge based on the market price of aluminum. In months when the base rate plus the surcharge is higher than the rate that would otherwise be applicable to Century, a credit equal to the excess will be entered into the "Century bank." Conversely, in months when the base rate plus the surcharge is less than the otherwise applicable rate, a debit will be recorded. A cumulative running balance of the Century bank will be kept.

CAD stated that at the end of the three-year experimental rate period, in 2009, the operation of the Century Rate will be examined and parties will be free to make whatever recommendations related to continuation, elimination or modification of the rate that they believe are appropriate at that time. If the Century Rate is continued, then whatever balance is in the Century bank will simply be rolled forward and the monthly accounting will continue. However, if the experimental rate is ended in 2009, then the Stipulation provides that Century will keep any surplus in the Century bank while any deficit will be spread to all other AEP customers.

As a hedge against a possible deficit in the Century bank, CAD noted that Century agreed to two major changes in its experimental rate. First, Century agreed to deposit \$1 million with AEP for the protection of other ratepayers. If there is a surplus at the end of the experimental rate, the \$1 million deposit will be spread as a credit to all other ratepayers. If there is a deficit, the \$1 million deposit will serve to reduce the deficit. Second, Century agreed to raise the ceiling on the surcharge so that greater surplus amounts would be built up during times of high aluminum prices. CAD asserted that raising the ceiling makes it more likely that any deficit in the latter part of the three-year rate period will be offset by surpluses developed during the early part of the three-year period.

CAD stated that it supports the experimental Century Rate within the context of the entire settlement. While there may be parts of the Century Rate proposal that CAD likes or

dislikes in isolation, CAD believes that the overall Century Rate is reasonable, and there are sufficient safeguards provided to protect the interests of the other ratepayers. Most importantly, CAD noted that the proposed Century Rate was of limited duration and would be thoroughly reviewed at the end of three years. At that time, CAD stated that if the Century Rate has not been beneficial to both Century and other ratepayers, it is doubtful that it would be renewed in its present form.

CAD reminded the Commission that the Century Rate was part of the resolution of controversies concerning proper allocation of the ENEC bank which was built up from 1996 through 1999. In return for getting agreement on the experimental rate design, Century gave up any claim to a portion of the ENEC bank. If the Commission declines to approve the experimental rate design for Century, then the parties have made clear that they reassert their original positions on the proper allocation of the ENEC bank. CAD indicated that these further controversies can be avoided by approving the Century Rate design as set forth in the Stipulation.

AEP

On May 4, 2006, AEP filed its Initial Brief. AEP asserted that the Century Rate contained in the Stipulation was reasonable and appropriate and an essential element of the Stipulation.

AEP noted that the Commission has a statutory obligation to balance the interests of customers, utilities and the state's economy. (*W.Va. Code* § 24-1-1(b)). AEP asserted that the Century Rate is an instance of such permissible balancing. It recognized the importance of Century to the West Virginia economy and the millions of dollars of AEP's fixed costs Century will bear. AEP argued that the fairness and reasonableness of Century's Rate was demonstrated by the support it has from the diverse interests supporting it.

AEP asserted that the *Code* does not contain a blanket prohibition of all preference and discrimination in rates. Instead, the *Code* prohibits discrimination that is unjust, undue, or unreasonable. (*See, W.Va. Code* §§ 24-1-1(a)(4); 24-2-2; 24-2-3; 24-3-1; and 24-3-2). AEP stated that to the extent the Century Rate constitutes a rate treatment that is at variance with what is available to other customers, the variance is just and reasonable because it serves the interests of all affected parties and fairly balances the interests of the utility, all classes of customers and the State's economy.

AEP argued that the *Code* does not require rates to be exclusively based on costs to be reasonable. *W.Va. Code* § 24-1-1(a)(4) simply mandates that rates be "based primarily on the costs of providing these services." In the case of the Century Rate, AEP stated that

the greatest part of the rate for service will be paid regularly, without discount adjustment or leeway in the timing of the payment. Depending on the prevailing commodity price of aluminum, Century may be required to pay a 100% cost-based rate and could be required to accrue amounts in excess of 100% which would be used to pay full rates at times when aluminum prices may be lower. AEP asserted that even if Century is paying the minimum amount required under the Century Rate proposal, that minimum rate satisfies the requirements of *W.Va. Code* § 24-1-1(a)(4), in that it is primarily cost-based.

Century

Century filed its Initial Brief on May 4, 2006. Century noted that the proposed Century Rate will provide it with some protection against a decline in the price of aluminum. Century stated that this would protect nearly 700 Century union jobs, potentially 1100 Alcan jobs and the economic benefits that Century brings to West Virginia.

Century stated that energy costs account for one-third of its production costs. Its energy expenditures exceed \$75.6 million per year at AEP's current rates. Century is 11% of AEP's load and is AEP's largest single customer. Century stated that without it, AEP would have to pass on an additional \$5 to \$7 million dollars per year of AEP's fixed costs to the remaining rate payers. The proposed Century Rate is a means of controlling its energy costs. When aluminum prices are high, Century can afford to pay more for power. But, Century stated when the prices are low, it cannot afford the higher tariff rate and remain economically viable.

Century argued that economic development and job retention are matters which the Commission may address under its statutory authority. The key issue is whether a rate is unjustly discriminatory. Century stated that the fact that various classes of customers are charged different rates does not in and of itself make a rate discriminatory. It must be unreasonably discriminatory in light of the factors that the Commission can consider, such as the cost of service, purpose of service, quantity of service, or any other matter which presents a substantial difference.

WVEUG

The WVEUG filed its Initial Brief on May 4, 2006. WVEUG stated that the Stipulation is fair to all customer classes, including the members of the WVEUG. It noted that the Stipulation nearly cuts in half the rate increase as originally proposed. In reducing specific rate impacts, WVEUG believes that the Stipulation implicitly recognizes the inherent value of industrial customers, the jobs they provide, and the additional benefits that are created as a result of their investment in West Virginia. WVEUG requested that the

Commission be mindful of West Virginia business and industry when considering whether the Stipulation, is, without modification, in the public interest. WVEUG believes that the Stipulation is, as a whole, in the public interest.

WVEUG noted that Rule 39 of the Commission's *Tariff Rules* recognizes that large industrial customers are often better served through special service agreements. Such agreements balance the uniqueness of larger customers and the benefits they provide to the entire system in terms of their fixed contributions to the rate base. WVEUG asserted that Century is worthy of the service flexibility requested in the Stipulation.

Reply Briefs

Staff

Staff filed its Reply Brief on May 15, 2006. Staff repeated that Century is a valuable industrial asset to the state's economy and that it is engaged in an energy-intensive industry that has been on the decline in the United States. However, Staff opined that until the Legislature in West Virginia enacted a statute providing the Commission with the authority to allow for special utility rates for depressed energy-intensive industries, the Commission is not statutorily authorized to do so.

CAD

CAD filed its Reply Brief on May 15, 2006. CAD disagrees with Staff's assertion that the Commission is not authorized, by statute, to adopt the Century Rate. CAD asserts that *W. Va. Code* §§ 24-2-2 and 3 give the Commission plenary authority over the rates of utilities within its jurisdiction. Those statutes set out guidelines for the Commission in establishing rates. But, CAD argued that the guidelines are not absolute and recognize the quasi-legislative nature of the ratemaking process, whereby the Commission is able to fully inform itself about the impacts of various proposals and adapt to changing conditions. *See, Central West Virginia Refuse, Inc. v. PSC*, 438 S.E.2d 596 (W.Va.1993).

CAD stated that the entire ENEC concept adopted for AEP in 1984 is an experimental rate whereby shortfalls in particular cost or revenue items are not borne by the Company, but instead are recorded as a regulatory asset and ultimately recovered from ratepayers. (*Appalachian Power Company*, Case No. 83-697-E-42T, 72 ARPSCWV 834, 841-842 (Sept. 28, 1984)).

CAD also pointed to another experimental rate structure aimed at economic development for qualifying industrial customers. Under the economic development rider,

new industrial customers or existing customers that increased their billing demand would be billed at 70%, 80% and 90% of the full billing demand in succeeding years over a three-year period. *See*, Case Nos. 87-154-E-P, "Final Order" (April 7, 1987); Case No. 88-696-E-PC, "Final Order" (Dec. 2, 1988); Case No. 89-796-E-PC, "Final Order" (Dec. 7, 1989); Case No. 91-009-E-PC, "Final Order" (Jan. 18, 1991).

CAD asserted that the experimental rate proposed in this case is a variation on the themes set out in the previous experimental rates. At the end of the three-year period, the rate design will be reviewed and the Commission will ultimately have to determine whether the Rate provided sufficient flexibility to Century while at the same time adequately protected the interests of AEP and other ratepayers. CAD stated that modifications may need to be made. However, CAD urged that such changes should be based on actual experience.

CAD agreed with Staff that the Commission should be very cautious in allowing experimental rates. CAD believes that experimental rates should be carefully defined as the Century Rate in the Stipulation has been. CAD asserted that the Commission has the statutory authority to adopt the Century Rate and should do so.

Century

Century filed its Reply Brief on May 15, 2006. Century asserted that the Commission has the authority to approve the Century Rate, that the Rate is fair, just and non-discriminatory and primarily cost-based.

Century asserted that the Commission's only limitation on the power to approve experimental rates is that they must be reasonable. Approval of special rates to retain industry is included in the Commission's authority, Century argued.

Century noted that the Commission's failure to approve the Century Rate will result in a rejection of the Stipulation and a reversion to the parties' original position with regard to the ENEC bank balance. The Stipulation resolves numerous contentious issues that will have to be litigated if the Century Rate is not approved.

WVEUG

WVEUG filed its Reply Brief on May 15, 2006. WVEUG stated that the central issue is whether the Century Rate is generally cost-based and beneficial to the utility and its customers. WVEUG asserted that the Century Rate is primarily cost-based because the minimum rate that Century will pay is approximately 90% of the total rate that Century would otherwise pay. WVEUG also asserted that the Century Rate is beneficial to AEP's

other customers as Century will be paying a substantial portion of the costs related to the overall revenue increase in this case. Additionally, in exchange for the special rate, Century is agreeing to forgo any claim it may have to the ENEC bank balance which is arguably a benefit to other customers.

AEP

AEP's Reply Brief was filed on May 15, 2006. AEP stated the issue was whether the provisions of Chapter 24 of the *Code* grant the Commission sufficient flexibility to approve the Century Rate. AEP stated that it and all the other parties except Staff believe the Commission has the required flexibility to approve the Century Rate.

AEP asserted that Staff's proposal to defer a ruling on the treatment of a possible deficit is neither fair nor equitable. AEP stated that it is practically impossible the Century Rate will produce an exact zero balance at the end of the period, so there would be some surplus or some deficit. AEP stated that the question is whether the mechanism which could produce such a surplus or deficit is unduly, unjustly or unreasonably preferential or discriminatory.

AEP argued that the Century Rate assures the ratepayers a substantial benefit - that Century will be allocated the responsibility for many millions of dollars of fixed costs which were the responsibility of those customers until the recent appearance of Century as a customer and, which could become the responsibility of those customers again if Century ceases operation. AEP stated that the Century Rate offers ratepayers a balanced calculated risk. But, it does not provide Century a guaranteed subsidy. Overall, AEP asserted that the arrangement provides a risk/benefit prospect that commands the support of all ratepayer constituencies.

AEP disputed that the Century Rate constituted unjust or unreasonable discrimination. AEP stated that preference or discrimination involve treating similarly situated entities differently. Century is unique and no other entity is similarly situated. Even if the proposal does constitute some measure of preference or discrimination, AEP stated that it was completely just and reasonable. AEP referenced the Commission's decision in *Appalachian Power Company and American Alloys, Inc.* Case No 87-883-E-C. AEP asserted that the same compelling reasons for the special treatment given American Alloys is the same economic considerations that are pertinent to Century.

AEP asked that the Commission approve the Century Rate and approve the Stipulation.

DISCUSSION

The Commission has had the opportunity to review the pre-filed testimony representing the respective parties' initial positions in this case. Additionally, the Commission has reviewed the Stipulation (attached hereto).

The only matter that remains for the Commission to resolve is the Century Rate. The Commission has carefully reviewed and considered the briefs and positions of the parties on that issue.

Staff's position as to the Commission's authority to approve the Stipulation inclusive of the Century Rate rests upon a narrow interpretation of the applicable statutes as well as past practices and policies of the Commission. The Commission is not persuaded that such an approach is appropriate and concludes that, in this case, the Commission is vested with the inherent jurisdiction, power and authority necessary to flexibly carry out its regulatory responsibilities while protecting the public interest and maintaining or enhancing West Virginia's economic viability.

It is no secret that in the past two decades the electric industry in the United States has undergone, and will continue to experience, tremendous change. Competitive forces in the market and demand for low-priced electricity are driving this change.

West Virginia, as a regulated state, cannot function obliviously to the changes occurring outside its boundaries. Instead, this Commission, if it is to protect the public interest and enhance the state's economic viability, must meet these challenges with unique and innovative approaches within the framework of traditional ratemaking and rate-based, rate-of-return regulation.

Introduction, development, testing and implementation of such unique and innovative approaches are within the scope of this Commission's statutory authority. The Commission encourages all parties to develop and propose unique and innovative approaches that will encourage investment in and expansion of capacity accompanied by an adequate rate of return, while at the same time maintaining and enhancing the state's position and that of its citizens.

For these reasons, the Commission concludes that the rates, charges, and terms and conditions of service contained in the Stipulation are reasonable and should be approved. The Stipulation will be approved as submitted.

FINDINGS OF FACT

1. All parties to this case jointly presented a Stipulation in resolution of all issues.
2. The Stipulation left open the issue of whether to adopt the proposed Century Rate. Staff was the only party objecting to that aspect of the Stipulation.

CONCLUSIONS OF LAW

1. The Commission is vested with the inherent jurisdiction, power and authority necessary to flexibly carry out its regulatory responsibilities while protecting the public interest and maintaining or enhancing West Virginia's economic viability.
2. The Commission concludes that it has the authority to approve the Century Rate.
3. The Commission concludes that the rates, charges, and terms and conditions of service contained in the Stipulation are reasonable and should be adopted. The Stipulation will be approved as submitted.

ORDER

IT IS, THEREFORE, ORDERED that the Joint Stipulation and Agreement for Settlement filed on April 24, 2006, and attached hereto as Appendix A, is hereby adopted by the Commission as the final resolution of the issues in this proceeding.

IT IS FURTHER ORDERED that the parties shall abide by the terms and conditions of the Stipulation.

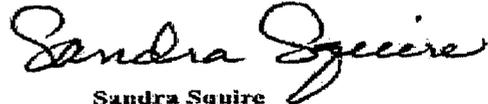
IT IS FURTHER ORDERED that within 10 days of the date of this order Appalachian Power Company and Wheeling Power Company, both doing business as American Electric Power, shall file with the Commission's Tariff Office the revised tariff sheets setting forth the rates and charges approved by this Order.

IT IS FURTHER ORDERED that the rates and charges approved by this order are hereby effective for all service rendered on and after July 28, 2006.

IT IS FURTHER ORDERED that upon entry of this order this case shall be removed from the Commission's docket of open cases.

IT IS FURTHER ORDERED that the Commission's Executive Secretary serve a copy of this order upon all parties of record by United States First Class Mail and upon Commission Staff by hand delivery.

A True Copy, Testes:


Sandra Squire
Executive Secretary

JMH/klm
051278cf.wpd

**PUBLIC SERVICE COMMISSION OF WEST VIRGINIA
CHARLESTON**

CASE NO. 05-1278-E-PC-PW-42T

**APPALACHIAN POWER COMPANY and
WHEELING POWER COMPANY**

Joint Application for Rate Increases on Notice with Proposed Effective Dates and Changes in Tariff Provisions, Pursuant to W.Va. Code, §24-2-4a, *inter alia*, for Reactivation and Modification of Expanded Net Energy Cost Mechanism, for Disposition of ENEC Over-recovery Balance, for Implementation of System Reliability Tracker Mechanism, and for Waiver of Provisions of the Commission's Rules.

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JOINT STIPULATION AND AGREEMENT FOR SETTLEMENT

Pursuant to *W. Va. Code* 24-1-9(f) and Rule 13.4 of Title 150, Series 1, *Rules of Practice and Procedure*, the following parties to this proceeding (hereinafter "the Stipulating Parties"), Appalachian Power Company ("APCo") and Wheeling Power Company ("WPCo") (collectively "the Companies"), the Staff of the Public Service Commission of West Virginia ("the Staff"), the Consumer Advocate Division of the Public Service Commission of West Virginia ("the CAD"), E.I. du Pont de Nemours and Company, Huntington Alloys Corporation, Bayer Crop Science/Bayer Material Science, PPG Industries, Inc., Union Carbide Corporation, and Steel of West Virginia, Inc. ("SWVA, Inc.") referred to collectively as West Virginia Energy Users Group ("WVEUG"), Century Aluminum of West Virginia, Inc. ("Century"), The Kroger Co. ("Kroger"), the Huntington Sanitary Board and South Putnam Public Service District (collectively "Huntington/South Putnam"), and the West Virginia Community Action

Partnership (“WVCAP”), join in this Joint Stipulation and Agreement for Settlement (“this Agreement”), and request that the Public Service Commission of West Virginia (“the Commission”) approve and adopt it, in its entirety and without modification, as the full and final resolution of the instant proceeding. In support of this Agreement, the Stipulating Parties make the following representations:

Procedural History

1. On August 26, 2005 the Companies filed their Joint Application to reinstate the Expanded Net Energy Cost (“ENEC”) proceedings, increase base rates and make changes in classifications, charges, rules and regulations, and other tariff provisions. The Joint Application was supported by seven volumes, including Rule 42 data, workpapers, ENEC data, proposed tariffs, a class cost of service study, and a report on emerging and state-of-the-art concepts.

2. On September 13, 2005 the Commission issued an Order which, among other things, suspended the use of the rates and charges stated in the Companies’ revised tariff sheets until June 23, 2006. By order of January 27, 2006 the Commission, in response to a motion filed by the Companies, extended the suspension period until July 28, 2006, but authorized deferred accounting for ENEC to commence July 1, 2006.

3. At various dates various entities filed petitions to intervene, which were granted by the Commission. Intervenors Concept Mining, Inc. and the West Virginia State Building and Construction Trades Council, AFL-CIO later withdrew from this proceeding. The South Bluefield Neighborhood Association intervened but did not offer testimony, participate in any of the settlement meetings, or appear at the April 18, 2006 hearing in this matter.

4. On September 26, 2005 the Companies filed the direct testimony and exhibits of Dana E. Waldo, Terry R. Eads, Paul R. Moul, John M. McManus, Stephen D. Baker, Jeffrey B. Bartsch, Alan D. Bragg, Jeffrey L. Brubaker, Steven H. Ferguson, Chris Potter, Oliver J. Sever, O. Patrick Taylor, and Philip A. Wright.

5. The Companies provided public notice in substantial compliance with the Commission's directions.

6. In the course of the discovery phase of this proceeding, numerous requests for information were filed by various parties and responded to by the parties to whom they were addressed.

7. On January 18, 2006 the Companies filed the supplemental direct testimony and exhibits of Terry R. Eads, Steven H. Ferguson, and Chris Potter, and a revised Volume IV containing revised ENEC data.

8. On March 8, 2006 the Staff filed the direct testimony and exhibits of James W. Ellars, Michael L. Fletcher, Steven M. Kaz, Robert R. McDonald, Edwin L. Oxley, David L. Pauley, and Thomas D. Sprinkle, as well as Staff Rule 42 Reports for APCo and WPCo; the CAD filed the direct testimony and exhibits of Byron L. Harris, Emily Medine, Randall Short, and Ralph Smith; WVEUG filed the direct testimony and exhibits of Stephen J. Baron, Richard A. Baudino, Timothy R. Duke and Richard Piotrowski; Century Aluminum filed the direct testimony and exhibits of Gerald J. Kitchen and Ronald Thompson; WVCAP filed the direct testimony and exhibits of Dwight Coburn; The Kroger Co. filed the direct testimony and exhibits of Kevin C. Higgins; West Virginia Building and Construction Trades Council, AFL-CIO filed the direct testimony and exhibits of George L. Donkin; and the Huntington Sanitary Board

and South Putnam Public Service District filed the direct testimony of Jack D. Gaines, J. Bruce Fox, and Michael McNulty.

9. On April 7, 2006 the Companies filed the rebuttal testimony and exhibits of Dana E. Waldo, Terry R. Eads, Paul R. Moul, Stephen D. Baker, Steven H. Ferguson, Jeffrey L. Brubaker, Jeffrey B. Bartsch, James I. Warren, Philip J. Nelson, O. Patrick Taylor, Alan D. Bragg, and Chris Potter.

10. On April 7, 2006 the Staff filed the amended direct testimony and exhibits and rebuttal testimony of Robert R. McDonald and the amended direct testimony and exhibits of Thomas D. Sprinkle; the CAD filed the rebuttal testimony and exhibits of Byron L. Harris and Ralph C. Smith; WVEUG filed the rebuttal testimony and exhibits of Stephen J. Baron; Century Aluminum filed the rebuttal testimony and exhibits of Gerald J. Kitchen; the Huntington Sanitary Board and South Putnam Public Service District filed the rebuttal testimony and exhibits of Jack D. Gaines.

11. On April 14, 2006 the Companies filed the additional rebuttal testimony of Chris Potter.

12. For some weeks prior to hearing, the Stipulating Parties engaged in settlement discussions concerning all aspects of the instant proceeding, and have now reached agreement on a comprehensive series of proposals to recommend to the Commission as a fair and just settlement of the issues in this proceeding.

13. At a hearing held on April 18, 2006 the Stipulating Parties represented to the Commission that a settlement in principle had been reached among those parties. The Commission directed the Stipulating Parties to provide it with a written and executed

settlement agreement memorializing the settlement by 9:30 a.m. April 21, 2006. The Commission admitted into the record all of the testimony and exhibits specified above.

14. Except as set forth in paragraph 15 below, the Stipulating Parties agree that the substantive elements of the proposed settlement, which are hereby submitted for the Commission's approval, resolve all of the issues in this proceeding, and are set forth in particular below and in the exhibits attached hereto.

15. Although the Stipulating Parties have reached agreement on most of the substantive elements presented in the case, there remain two related issues in contention among the parties which will have to be resolved by the Commission. This first issue involves one aspect of the Special Rate Mechanism for Century Aluminum set forth in paragraph 37 below. As explained in paragraph 37d, there is the possibility that at the end of experimental rate program for Century in 2009, there may be a deficit (an under-recovery) which will be spread to other customers in future rate proceedings. The second issue is the treatment of the ENEC Bank discussed in paragraphs 19 to 24 below. As part of the consideration for the Special Rate Mechanism, Century has given up any claim for a portion of the ENEC Bank. If the Special Rate Mechanism, including the recovery of any deficit, is not approved, Century will reassert its claim for a portion of the ENEC Bank. Set forth below are the positions of the respective parties on these issues.

a. Staff. Staff has agreed to all terms and conditions of the Joint Stipulation and Agreement for Settlement except for the condition in the Special Rate Mechanism for Century Aluminum whereby any deficit that remains at the end of the experimental rate mechanism time period will be recorded by APCo as a regulatory asset and flowed back to all other ratepayers. Staff is willing to defer any argument concerning the deficit until

the end of the experimental rate period, and if a deficit in fact exists at that time, advance its arguments to the Commission regarding the proper treatment of such deficit.

b. The Companies. APCo and WPCo support approval of the Special Rate Mechanism for Century Aluminum, but do not support the special rate mechanism without the provision objected to by the Staff, which is an integral element of the negotiated special rate mechanism. The Companies ask the Commission to resolve here and now any issues about the experimental rate program and to approve it or disapprove it without deferring any critical issues for resolution at a later date.

c. Century Aluminum. If the Commission does not approve this experimental rate program in all its particulars, including providing APCo recovery of any deficit, and thereby APCo does not enter into a special contract with Century Aluminum, then Century withdraws its support for the remainder of this settlement and reasserts its claim to the ENEC Bank.

d. WVEUG. WVEUG supports approval of the Special Rate Mechanism for Century Aluminum. However, if the Special Rate Mechanism is disapproved and Century reasserts its claim for a portion of the ENEC Bank, WVEUG asserts that the allocation of the ENEC Bank set forth in Exhibit C continues to be reasonable and should be approved as part of this settlement.

e. The Kroger Co. The Kroger Co. takes the same position as WVEUG.

f. CAD. Within the context of the overall settlement, the CAD supports approval of the Special Rate Mechanism for Century Aluminum. However, if the Special Rate Mechanism is disapproved and Century reasserts its claim for a portion of the ENEC Bank, CAD asserts that Century has no legitimate claim on the ENEC Bank.

Accordingly, the ENEC Bank should continue to be allocated as set forth in Exhibit C hereto.

- g. Huntington Sanitary Board and South Putnam Public Service District.

These parties take the same position as the CAD.

- h. Accordingly, the Stipulating Parties ask that the Commission render a specific decision on the issues outlined above. The Stipulating Parties stand ready to offer oral argument, witnesses and/or written briefs on these issues at the direction of the Commission.

16. Expanded Net Energy Cost The Stipulating Parties agree that the Expanded Net Energy Cost ("ENEC") mechanism should be reinstated for the Companies, with new ENEC rates established in this proceeding, and annual ENEC proceedings to resume in 2007.

17. The Stipulating Parties agree to the following ENEC rates:

- a. Consistent with the Commission's January 27, 2006 Order in this proceeding, the Stipulating Parties acknowledge that the Companies will commence deferred accounting for revenues and costs included in the ENEC on July 1, 2006 and agree that the ENEC rates to be used for such deferred accounting for each tariff class on July 1, 2006, shall be those set forth in Company Exhibit No. 1, Revised Volume IV, Revised Section 2, Attachment 1, which is attached hereto as Exhibit A and incorporated herein.

- b. The Stipulating Parties agree that, beginning July 28, 2006, the ENEC rates for each tariff class shall be those set forth in Company Exhibit No. 1, Revised Volume IV, Revised Section 1, Attachment 1, which is attached hereto as

Exhibit B and incorporated herein. Those ENEC rates will stay in effect until July 1, 2007, or further order of the Commission, and are projected to produce additional annual revenues of \$56.01 million.

18. The Stipulating Parties agree to the following elements and procedures to govern further ENEC proceedings.

a. The Companies will make their next ENEC filing by March 1, 2007, and then will make new ENEC filings by March 1st of each year thereafter.

b. In the ENEC filing of March 1, 2007:

i. the actual cost review period shall be July 1, 2006, through December 31, 2006; and

ii. the forecast period shall be July 1, 2007, through June 30, 2008.

c. In subsequent annual ENEC proceedings the actual cost review period shall be the immediately preceding calendar year, and the forecast period shall be the twelve months from July 1st of the year in which the proceeding is initiated through June 30th of the following year.

ENEC Over-Recovery Balance

19. The Stipulating Parties agree that the accumulated ENEC over-recovery balance ("the Bank") being held by APCo, and to be fed back to customers pursuant to this Agreement, is \$51,207,683, plus simple interest on the principal balance as per the Commission's November 10, 2005 Order. That simple interest has been accrued since November, 2005 and will continue to be accrued on the declining principal balance until the entire balance has been fed back to customers.

20. The allocation of the Bank among customer classes and customers shall be in accordance with the proposal of WVEUG, which is attached hereto as Exhibit C and incorporated herein by reference.

21. Beginning July 28, 2006, the Companies shall implement negative surcharges by customer class, for all classes and customers receiving a portion of the Bank, designed to feed back one-third of the principal balance of the Bank to said customer classes and customers over the following eleven (11) months. Pursuant to the following paragraph, certain customers may elect an accelerated feedback of their portion of the Bank.

22. The Kroger Co., Huntington Sanitary Board, South Putnam Public Service District, and/or the members of WVEUG may request alternative feedback mechanism(s) designed to enable them to realize an accelerated feedback of their shares of the Bank. On condition that no alternative mechanism enables an electing customer to receive more than the shares of the Bank, plus interest up to the date of payout, which it would have received under the standard mechanism provided for in the preceding paragraph, the Companies are willing, after Commission approval of this Agreement, to negotiate reasonable mechanisms for accelerated feedback, subject to legal constraints and practical limitations.

23. In consideration of the Special Rate Mechanism discussed below, Century shall not be entitled to any share in the principal balance of the Bank or any interest accrued thereon.

24. The timing and particulars of the feed back of the residual balance of the Bank, plus interest, remaining after compliance with the preceding paragraphs of this

section, shall be as determined and directed by the Commission in the next ENEC proceeding filed by the Companies.

Recovery of Expenditures Related to the 765 kV Line and Scrubbers

25. APCo is currently engaged in the following extraordinary construction projects: (1) the Wyoming-Jacksons Ferry 765 kV Transmission Line; and (2) the retrofit of flue-gas desulfurization units (“scrubbers”) on the Mountaineer generating plant and Units 1, 2 and 3 of the John Amos generating plant (collectively referred to as “the projects”).

26. The Stipulating Parties adopt, with certain modifications, the CAD’s proposal for rate increments in future ENEC proceedings. The Wyoming-Jacksons Ferry 765 kV line is to be provided electric plant in service (“EPIS”) treatment at a 10.5% return on equity based on the construction work in progress (“CWIP”) balance as of December 31, 2005, including projected depreciation, taxes and other fixed operating expense. The Wyoming-Jacksons Ferry line and each of APCo’s planned scrubber projects will be afforded EPIS treatment at a 10.5% return on equity in succeeding ENEC proceedings after a given project has been placed in service, provided the project is in service no later than March 1st of the year the ENEC factor becomes effective. EPIS treatment will include the recovery of estimated fixed costs.

27. The Stipulating Parties agree that the Companies should be allowed to recover the construction expenditures and other costs related to the projects during the construction phase and, after the projects are classified as EPIS, in the following manner:

a. APCo shall accrue AFUDC on construction expenditures for each project, based on a 10.5% ROE. In each ENEC proceeding APCo shall be allowed to

recover a return and associated taxes ("Return") on all CWIP expenditures along with accrued AFUDC made in connection with the projects through the end of the ENEC review period, December 31st of each year. Rates recovering such return ("construction surcharges") shall go into effect on July 1st of the next succeeding year as part of the ENEC.

b. The return on such CWIP and EPIS shall be based on:

i. the amount of equity, long term debt, short term debt and preferred stock in APCo's capital structure based on a thirteen month average as of December 31st of each year;

ii. a rate of return on equity capital of 10.5%, and a return on other capital (long term debt, short term debt and preferred stock) at the thirteen month average cost of such other capital component as of December 31st of each year.

c. CWIP balances earning a CWIP allowance would not be subject to the accrual of AFUDC. CWIP balances in excess of amounts earning a CWIP allowance shall continue to be subject to the accrual of AFUDC during the construction period. In addition to a return on CWIP existing at December 31st of each year, all projects that are transferred to EPIS by March 1st of the succeeding year, shall also be allowed to recover depreciation, property taxes and other fixed costs associated with such EPIS to be incurred over the next succeeding ENEC recovery period.

d. In succeeding ENEC proceedings, projects previously transferred to EPIS shall be allowed to recover a Return on EPIS balances net of accumulated depreciation as of December 31st of each year, along with depreciation, property taxes and other fixed costs.

e. The Stipulating Parties agree that the Companies shall be allowed to recover in rates effective July 28, 2006, a total of \$23.21 million associated with CWIP expenditures on the projects as of December 31, 2005. The Stipulating Parties also agree that the \$23.21 million allowance includes recovery of depreciation, property taxes and other fixed costs associated with the Wyoming-Jacksons Ferry 765 kV transmission line.

f. Construction surcharges and EPIS surcharges shall be established as part of the Companies' annual ENEC proceedings, but the costs and revenues associated with these construction surcharges and EPIS surcharges shall not be subject to deferred accounting for regulatory purposes. The Stipulating Parties acknowledge that the construction and EPIS surcharges established in this case are calculated for the various customer classes based on the twelve coincident peak (12 CP) demand allocator.

Base Rates

28. The Stipulating Parties agree that effective July 28, 2006, the Companies' current base rates shall be reduced by \$18,433,000 on an annual basis, based on a return on equity of 10.5%. Exhibit D, attached hereto and incorporated herein, is a cost of service showing the derivation of the Companies' stipulated base rate revenue requirement. Although no Stipulating Party agrees with each and every item in the attached cost of service, all parties agree that the overall cost of service is reasonable, and should be adopted by the Commission.

29. The base rates provided for in this Agreement reflect the recovery of the amortization of the Asset Retirement Obligation ("ARO") as proposed by the Companies in this case.

30. The rate changes with respect to base rate decreases, the feedback of the Bank, ENEC increases, and the 2006 construction surcharges shall be allocated among the customer classes as shown on Exhibit E attached hereto and incorporated herein.

Reliability Expenditures

31. The Companies shall collectively expend an average of \$18,660,000 annually in each calendar year, 2007, 2008, and 2009, for measures designed to maintain and enhance reliability of service (i.e. right-of-way vegetation management and asset management activities). This annual sum constitutes an addition of \$4.782 million over 2004 test year levels.

32. The Stipulating Parties agree that if APCo fails to earn a rate of return on common equity ("ROE") of at least 10.5% on a per books West Virginia retail jurisdictional basis during any of the calendar years, 2007, 2008, or 2009, APCo shall be entitled to defer an amount for T&D reliability expenditures sufficient to enable its ROE to equal 10.5%, up to a collective maximum annual deferral of \$4.782 million. At its election, APCo shall be allowed to obtain appropriate recovery of any such deferrals in succeeding ENEC or base rate case(s) following such deferrals.

33. If the Companies intend to include in a case the issue of recovery of any deferral referred to in the preceding paragraph, the Companies will give prior notice to the other Stipulating Parties along with a calculation showing the derivation of the deferral. The other Stipulating Parties shall be free to take whatever position they deem appropriate concerning the appropriate amount of such recovery based on the ROE earned by APCo, the proper calculation of ROE, and the sums expended on T&D reliability measures.

34. The Companies recognize that it is their responsibility, as it is the responsibility of all public utilities in this State, under W Va. Code §24-3-1, to provide a reasonable level of reliable electric service to their customers. Nothing in this Agreement is intended to (1) relieve or limit the Companies' obligation to expend the funds needed to discharge this responsibility or (2) absolve the Companies of their legal duty as set forth in W. Va. Code §24-3-1.

Depreciation Rates

35. Effective July 1, 2006, APCo's West Virginia depreciation rates shall be modified in accordance with the schedule of depreciation rates attached hereto as Exhibit F and incorporated herein by reference.

36. Notwithstanding the provisions of this Agreement by which the Stipulating Parties agree to changes in the Companies' depreciation rates as a significant element of the Settlement, the Staff wishes to make clear that its agreement is due to the unique circumstances of this case. The Staff holds firm to its position that depreciation rate issues should not be part of any application filing in a base rate case, but should be addressed by a separate filing made pursuant to Rule 20 of the Commission's Rules of Practice and Procedure.

Special Rate Mechanism for Century Aluminum

37. The Stipulating Parties agree that Century provides important contributions to the economy of West Virginia in terms of good-paying industrial jobs, tax revenues, and other factors. In light of those contributions, the electric-energy-intensiveness of Century's operations, and the competitiveness of Century's industry, the Stipulating Parties agree that it is appropriate to undertake an experiment in devising and

applying a special rate mechanism to Century that is linked to the commodity price of aluminum and that compensates the Companies' ratepayers for the risks which the experiment poses for them. If approved by the Commission, the special rate mechanism experiment shall be implemented August 1, 2006 and shall operate as follows:

a. Century currently pays a rate equivalent to \$27.16 per Mwh (the "current rate"). Subject to subpart c hereof, on and after August 1, 2006, Century shall pay each month to APCo the lower of the cost-based rate applicable to Century resulting from this or any future rate proceeding, or the current rate plus a surcharge based on the simple average daily price of aluminum for the month as quoted on the London Metal Exchange and as published by Reuters ("the LME price"). These surcharges are set forth in Exhibit G attached hereto and incorporated herein.

b. Each month the current price plus the surcharge will be greater than or less than the total rate responsibility allocated to Century. ("the otherwise applicable rate"). Century and APCo will keep a running cumulative balance of these monthly surpluses and deficits ("the Century Bank"). If in any month APCo does not receive adequate revenue under the experimental rate mechanism, including any payments from the Century Bank, equivalent to that which would be due from the otherwise applicable rate, APCo will be authorized to record a regulatory asset in the amount of such under-recovery for future recovery from the Companies' customers, as a part of its ENEC, at the conclusion of the experiment, pursuant to subpart d hereof. Century shall maintain a monthly accounting record of the Century Bank, subject to audit by the Companies and the Public Service Commission, showing the monthly and cumulative surplus or deficit.

c. As security for the Companies and other ratepayers, a portion of the monthly payments based on the current rate plus the applicable surcharge will be retained by APCo, up to \$1,000,000, and will be paid by Century in months when the current price plus the applicable surcharge exceeds the otherwise applicable rate. That amount will be considered part of the Century Bank, although held by APCo as a regulatory liability to be credited to customers in accordance with subpart d hereof. At Century's option, the \$1,000,000 amount can be paid to APCo in equal monthly payments during the first year of the experimental rate program. APCo will accrue interest on the amount collected under this subpart at the Commission's approved interest rate on deposits.

d. The experimental rate program will be reviewed by the Commission during the 2009 ENEC proceeding. If the experimental rate program is extended, any existing Century Bank balance will roll forward into the new plan. If the experimental rate program is terminated, Century will have no further obligations to pay or rights to receive payments under this program. If the program is terminated, the Companies will reflect any regulatory asset and/or regulatory liability as a net charge or credit to all customers, excluding Century, in the next ENEC proceeding.

e. If the Commission approves this experimental rate program in all its particulars, Century and APCo will negotiate a detailed contract to implement this experimental rate program and will file such contract with the Commission under Rule 39 of the Commission's Rules. If the Commission does not approve this experimental rate program in all its particulars, APCo shall have no obligation to provide service to Century other than at its otherwise applicable rate.

RS Rate Design

38. The increase allocated to the residential (RS) class shall be recovered from the usage blocks in that rate class. There will be no increase in the customer charge and no imposition of a separate minimum bill.

LGS Rate Design

39. The Stipulating Parties agree to modify the demand/energy split for the LGS rate schedule to reflect a demand charge at 80% of full cost. The base rate revenue reduction applicable to the LGS class shall be applied 80% to energy and 20% to demand. Customer migrations between MGS and LGS shall not be permitted until the next rate case, except in the case of material changes in load which result in a dramatic change in a customer's usage characteristics. However, the Companies agree that the accounts of Huntington/South Putnam and the water and sewer utilities that have supported the participation of Huntington/South Putnam in this proceeding (which are listed on Exhibit H attached hereto and incorporated herein) will have been placed on the appropriate MGS or LGS rate schedule for which they qualify prior to July 28, 2006.

Low-Income Weatherization Projects

40. For the next three years, the Companies shall make a collective annual contribution of \$250,000 to the West Virginia Governor's Office of Economic Opportunity to be administered for WVCAP, to be used for low-income residential weatherization projects. The scheduling of the payments and the usage of the funds shall be arranged between the Companies and OEO weatherization staff on behalf of WVCAP.

**Terms and Conditions of Service
and Requested Rule Waivers**

41. The Companies have withdrawn their requests for a partial waiver of Electric Rule 4.2.1.a, for a grant of flexibility and discretion to require additional security deposits of non-residential customers, for the institution of fixed non-refundable charges for temporary service, and for a tariff modification concerning customer liability.

42. The Stipulating Parties agree that the Companies should be granted partial waivers of Electric Rules 4.8.1.a.F and 4.8.1.a.H to enable them to defer non-emergency reconnections of service from times of darkness to times of daylight and authorize their field personnel to decline to accept cash payments to forestall disconnections of service for non-payment.

43. The Companies shall be authorized to impose a 1% delayed payment charge ("DPC") on a current bill owed by customers served under Rate Schedules R.S. and R.S. – T.O.D. if not paid "by the next scheduled read date." The DPC may be assessed only once on a given current bill. Before this new DPC is implemented, the Companies shall be required to give notice by bill message or bill insert to at least the customer classes affected, in two successive billing months, of the basic facts about the new DPC. The Companies shall change the proposed language in their tariffs about the point at which an account becomes subject to a DPC assessment for balances not paid "by the next bill preparation date" to "by the next scheduled read date." The approval and implementation of this new DPC shall have no effect on the DPCs already in operation under other rate schedules of the Companies.

Base Rate Case Filing Commitment

44. The Companies commit to filing a base rate case, predicated on a 2009 test year, by no later than the second quarter of 2010.

General Matters

45. The Stipulating Parties agree to waive their right to conduct in this proceeding any examination of the witnesses of any other party to this Agreement, except that the parties may ask clarifying questions concerning this Agreement.

46. This Agreement is entered into subject to the acceptance and approval of the Commission. It results from a review of any and all filings in this proceeding, the Stipulating Parties' prefiled testimony and exhibits, and extensive discovery and discussion. It reflects substantial compromises by the Stipulating Parties and the withdrawal of their respective positions asserted in this case, and is being proposed to expedite and simplify the resolution of this proceeding and other outstanding matters. It is made without any admission or prejudice to any positions which any party might adopt during subsequent litigation. The Stipulating Parties adopt this Agreement as being in the public interest, without adopting any of the compromise positions set forth herein as ratemaking principles applicable to future ENEC proceedings, Rule 42 proceedings, or other regulatory proceedings, except as expressly provided herein. The Stipulating Parties acknowledge that it is the Commission's prerogative to accept, reject, or modify any stipulation. However, in the event that this Agreement is rejected or modified by the Commission, it is expressly understood by the Stipulating Parties that they are not bound to accept this Agreement as modified or rejected, and may avail themselves of whatever

rights are available to them under law and the Commission's Rules of Practice and Procedure.

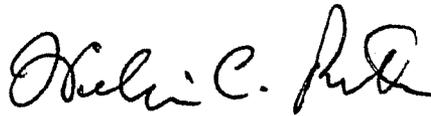
WHEREFORE, the Stipulating Parties (except the Staff with regard to the one element identified in Paragraph 15) on the basis of all the foregoing, respectfully request that the Commission make appropriate Findings of Fact and Conclusions of Law adopting and approving the Joint Stipulation and Agreement for Settlement in its entirety, including specifically Exhibits A through H.

Respectfully submitted this 24th day of April, 2006.

Respectfully Submitted

**APPALACHIAN POWER COMPANY and
WHEELING POWER COMPANY**

By: _____



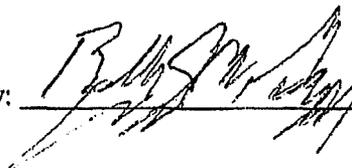
**STAFF OF THE PUBLIC SERVICE
COMMISSION OF WEST VIRGINIA**

By: _____



**CONSUMER ADVOCATE DIVISION OF THE
PUBLIC SERVICE COMMISSION
OF WEST VIRGINIA**

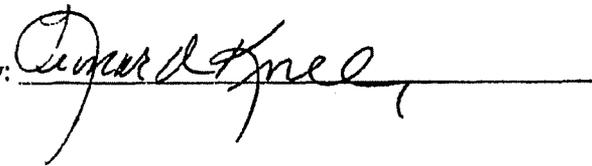
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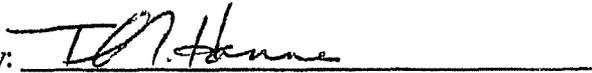
WEST VIRGINIA ENERGY USERS GROUP

By: 

**CENTURY ALUMINUM OF
WEST VIRGINIA, INC.**

By: 

THE KROGER CO.

By: 

**HUNTINGTON SANITARY BOARD AND
SOUTH PUTNAM PUBLIC SERVICE
DISTRICT**

By: 

**WEST VIRGINIA COMMUNITY ACTION
PARTNERSHIP**

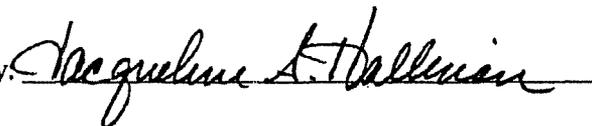
By: 

EXHIBIT A

**Revised Section 2
Attachment 1
Page 1 of 3**

Revised Section 2: Actual Period Ended December 31, 2004

ENEC Rates

APPALACHIAN POWER COMPANY / WHEELING POWER COMPANY
EXPANDED NET ENERGY COST (ENEC) RATES
TWELVE MONTHS ENDED 12/31/2004
INCLUDES DATA CORRECTIONS

CUSTOMER CLASS	ENEC ENERGY FACTOR	ENEC DEMAND FACTOR
	C/KWH	\$/KW
RS	1.612	
RS -TOD / RS-LM-TOD		
ON-PEAK	1.617	
OFF-PEAK	1.108	
SWS	1.619	
SGS	1.526	
SGS - LM-TOD		
ON-PEAK	1.526	
OFF-PEAK	1.169	
SS		
-SEC	1.107	1.342
-PRI	1.076	1.303
-AF	1.539	
MGS		
-SEC	1.107	1.159
-PRI	1.077	1.125
-SUBTRAN	1.057	1.095
-TRANS	1.041	1.077
-AF	1.541	
GS:TOD		
ON-PEAK -SEC	1.884	
OFF-PEAK -SEC	1.258	
ON-PEAK -PRI	2.040	
OFF-PEAK -PRI	1.318	
LGS		
-SEC	1.108	1.680
-PRI	1.076	1.612
-SUBT	1.057	1.570
-TRANS	1.041	1.544
LCP		
-SEC	1.108	1.597
-PRI	1.076	1.550
-SUBT	1.057	1.511
-TRANS	1.040	1.488
IP		
-SEC	1.105	1.884
-PRI	1.075	1.829
-SUBT	1.057	1.782
-TRANS		
All Other	1.040	1.752
SPECIAL CONTRACT I	1.040	1.752
SPECIAL CONTRACT G	1.040	1.769
SPECIAL CONTRACT H	1.040	2.212
OL	1.105	
SL	1.105	

SPECIAL CONTRACT A		
FIRM POWER	1.040	1.752
INTERRUPTIBLE DEMAND		1.162
P1	1.040	
P2	1.040	
P2.5	1.040	
P3	1.040	
P4	1.040	
SPECIAL CONTRACT B		
138 KV SERVICE		
CAPACITY CHARGE		0.913
P1	1.040	
P2	1.040	
P2.5	1.040	
P3	1.040	
P4	1.040	
46 KV SERVICE		
P1	1.055	
P2	1.055	
P2.5	1.055	
P3	1.055	
P4	1.055	
SPECIAL CONTRACT C		
P1	1.096	
P2	1.275	
P3	12.752	
P4	7.555	
SPECIAL CONTRACT D		
FIRM POWER	1.054	1.777
ON-PEAK DEMAND		0.644
OFF-PEAK DEMAND EXCESS		0.118
SHOULD. PEAK DEM. EXCESS		0.379
INTERR. ENERGY	1.040	
SPECIAL CONTRACT E		
-SEC		
ON-PEAK	1.653	
OFF-PEAK	1.385	
SHOULDER PEAK	1.447	
-PHI		
ON-PEAK	1.674	
OFF-PEAK	1.333	
SHOULDER PEAK	1.418	
SPECIAL CONTRACT F		
FIRM POWER	1.057	2.048
BACK-UP POWER	1.057	0.205
MAINTENANCE	1.094	

FLOODWALL ENEC Factor for floodwall accounts is the energy component of the appropriate general service tariff for which the customer would qualify.

EXHIBIT B

Revised Section 1

Attachment 1

Page 1 of 3

Revised Section 1: Proposed Period Ending December 31, 2006

ENEC Rates

APPALACHIAN POWER COMPANY / WHEELING POWER COMPANY
PROPOSED EXPANDED NET ENERGY COST (ENEC) RATES
2006 ENEC FACTOR

INCLUDES DATA CORRECTION & INCLUDES CEREDON

CUSTOMER CLASS		ENEC ENERGY FACTOR C/KWH	ENEC DEMAND FACTOR \$/KW
RS		1.932	
RS -TOD / RS-LM-TOD			
	ON-PEAK	1.938	
	OFF-PEAK	1.407	
SWS		1.943	
SGS		1.848	
SGS - LM-TOD			
	ON-PEAK	1.848	
	OFF-PEAK	1.473	
SS	-SEC	1.408	1.387
	-PRI	1.389	1.347
	-AF	1.853	
MGS	-SEC	1.408	1.198
	-PRI	1.370	1.162
	-SUBTRAN	1.345	1.132
	-TRANS	1.325	1.113
	-AF	1.856	
CS:TOD			
ON-PEAK	-SEC	2.339	
OFF-PEAK	-SEC	1.408	
ON-PEAK	-PRI	2.554	
OFF-PEAK	-PRI	1.397	
LCS	-SEC	1.407	1.715
	-PRI	1.369	1.665
	-SUBT	1.345	1.622
	-TRANS	1.325	1.595
LCP	-SEC	1.407	1.649
	-PRI	1.389	1.601
	-SUBT	1.345	1.580
	-TRANS	1.323	1.534
IP	-SEC	1.408	1.948
	-PRI	1.388	1.890
	-SUBT	1.344	1.842
	-TRANS		
	All Other	1.323	1.811
	SPECIAL CONTRACT I	1.323	1.811
	SPECIAL CONTRACT G	1.323	1.834
	SPECIAL CONTRACT H	1.324	2.269
OL		1.408	
SL		1.408	

APPALACHIAN POWER COMPANY / WHEELING POWER COMPANY
PROPOSED EXPANDED NET ENERGY COST (ENEC) RATES
2006 ENEC FACTOR

INCLUDES DATA CORRECTION & INCLUDES GCRBDO

CUSTOMER CLASS	ENEC ENERGY FACTOR C/KWH	ENEC DEMAND FACTOR \$/KW
SPECIAL CONTRACT A		
FIRM POWER	1.323	1.811
INTERRUPTIBLE DEMAND		1.852
P1	1.323	
P2	1.323	
P2.5	1.323	
P3	1.323	
P4	1.323	
SPECIAL CONTRACT B		
138 KV SERVICE		
CAPACITY CHARGE		0.945
P1	1.323	
P2	1.323	
P2.5	1.323	
P3	1.323	
P4	1.323	
46 KV SERVICE		
P1	1.343	
P2	1.343	
P2.5	1.343	
P3	1.343	
P4	1.343	
SPECIAL CONTRACT C		
P1	1.383	
P2	1.621	
P3	16.208	
P4	11.716	
SPECIAL CONTRACT D		
FIRM POWER	1.3410	1.837
ON-PEAK DEMAND		0.859
SHOULD. PEAK DEM.		0.391
OFF-PEAK DEMAND		0.121
INTERR. ENERGY	1.3230	
SPECIAL CONTRACT E		
-SEC		
ON-PEAK	1.897	
OFF-PEAK	1.685	
SHOULDER PEAK	1.740	
-PRI		
ON-PEAK	2.001	
OFF-PEAK	1.593	
SHOULDER PEAK	1.695	
SPECIAL CONTRACT F		
FIRM POWER	1.344	2.120
BACK-UP POWER	1.344	0.212
MAINTENANCE	1.382	
FLOODWALL	ENEC Factor for floodwall accounts is the energy component of the appropriate general service tariff for which the customer would qualify.	

EXHIBIT C

Baron Exhibit__(SJB-1R)
(Modified per Stipulation)

Appalachian Power Company
WVEUG Proposal to
Distribute ENEC Overrecovery
Case No. 06-1 278-E-PC-PW42T

Tariff	Voltage	WVEUG Settlement (total bank balance)	WVEUG Settlement (1st year / 3rd feedback)
RS		27,899,511	8,288,837
SWS		288,845	88,948
SGS		1,222,031	407,344
SS	Sec.	803,504	287,835
SS	Pri.	46,268	15,422
SS	Ath. Field	10,983	3,881
		860,752	288,917
MGS	Sec.	3,252,179	1,084,080
MGS	Pri.	364,330	121,443
MGS	Subtr.	21,853	7,218
MGS	Trans.	-	-
MGS	Ath. Field	6,011	2,004
		3,644,173	1,214,724
GS-LMTOD	Sec-peak	35,890	11,883
GS-LMTOD	Sec-off	19,089	6,363
GS-LMTOD	Pri-peak	22,883	7,554
GS-LMTOD	Pri-off	8,443	2,814
		86,088	28,695
LGS	Sec.	3,238,548	1,078,849
LGS	Pri.	483,058	164,353
LGS	Subtr.	12,999	4,333
LGS	Trans.	-	-
		3,742,603	1,247,534
LCP	Sec.	250,008	83,338
LCP	Pri.	1,407,523	469,208
LCP	Subtr.	2,411,049	803,683
LCP	Trans.	723,980	241,330
		4,792,671	1,597,557
IP	Sec.	201,891	67,330
IP	Pri.	2,282,228	764,076
IP	Subtr.	2,043,528	681,176
IP	Trans.	1,251,181	417,054
		5,758,907	1,919,636
SPECIAL A		-	-
SPECIAL B		437,195	145,732
SPECIAL C		4,244	1,416
SPECIAL D		418,383	139,481
SPECIAL E		8,998	3,332
SPECIAL F		78,987	26,329
SPECIAL G		1,217,003	405,888
SPECIAL H		-	-
SPECIAL I		552,482	184,164
OL		137,008	45,669
SL		78,083	25,384
TOTAL		51,207,981	17,089,327

EXHIBIT D

Exhibit _____

**Appalachian Power Company and Wheeling Power Company
Case No. 05-1278-E-PC-PW-42T
Revenue Requirement Calculation for Settlement**

	Settlement
Weighted Cost of Capital	7.601%
Return on Equity	10.50%
Rate Base	1,657,541,508
Return on Rate Base	<u>125,986,586</u>
Federal Taxes	31,499,147
State Taxes	11,969,676
Operation & Maintenance Expense	727,297,676
Depreciation Expense	79,833,661
Taxes Other Than Income	<u>53,803,432</u>
Total Expenses	<u>904,403,591</u>
Revenue Requirement	<u>1,030,400,177</u>
Going Level Revenues	1,048,473,441
Subtotal	(18,073,264)
Additional Uncollectibles	(65,064)
Additional B&O	(291,702)
Revenue Increase/(Decrease)	(18,430,030)

EXHIBIT E

Appalachian Power Company
 Revenue Changes by Tariff Class
 Case No. 05-1278-E-PC-PW-42T

<u>Tariff</u>	<u>Base Rate Decrease</u>	<u>ENEC Increase</u>	<u>Construction Surcharge</u>	<u>Net Revenue Change</u>	<u>ENEC Bank Amortization</u>	<u>Net Impact</u>
RS	\$2,422,695	\$18,735,078	\$9,321,138	\$30,478,907	(\$9,299,837)	\$21,179,070
SWS	(\$49,693)	\$284,837	\$141,870	\$377,015	(\$89,948)	\$287,066
SGS	(\$313,432)	\$794,042	\$328,594	\$809,203	(\$407,344)	\$401,860
SS	(\$202,033)	\$1,068,225	\$513,713	\$1,379,905	(\$286,917)	\$1,092,988
MGS	(\$4,769,035)	\$4,849,498	\$2,168,946	\$2,049,407	(\$1,243,420)	\$805,987
LGS	(\$3,848,810)	\$4,848,588	\$1,921,120	\$2,920,898	(\$1,247,534)	\$1,673,362
LCP	(\$4,381,852)	\$6,185,894	\$2,461,890	\$4,286,933	(\$1,597,557)	\$2,688,376
IP	(\$3,828,807)	\$7,813,388	\$2,655,841	\$6,442,622	(\$1,919,636)	\$4,522,986
SPECIAL A	(\$8,117)	\$136,538	\$24,304	\$152,725	\$0	\$152,725
SPECIAL B	(\$203,009)	\$598,431	\$180,164	\$583,588	(\$145,732)	\$437,854
SPECIAL C	(\$8,105)	\$6,739	\$256	(\$1,110)	(\$1,415)	(\$2,525)
SPECIAL D	(\$392,810)	\$594,700	\$139,778	\$341,668	(\$139,461)	\$202,207
SPECIAL E	\$94	\$11,929	\$4,482	\$16,505	(\$3,332)	\$13,173
SPECIAL F	(\$40,547)	\$107,780	\$35,765	\$102,998	(\$26,329)	\$76,669
SPECIAL G	(\$508,467)	\$1,205,428	\$354,502	\$1,051,463	(\$405,868)	\$645,596
SPECIAL H	(\$1,125,428)	\$8,121,578	\$2,705,226	\$9,701,378	\$0	\$9,701,378
SPECIAL I	(\$431,249)	\$742,623	\$242,311	\$553,685	(\$184,164)	\$369,521
				\$0		
OL	(\$580,767)	\$222,218	\$0	(\$338,549)	(\$45,869)	(\$384,218)
SL	(\$204,858)	\$87,575	\$0	(\$117,283)	(\$25,364)	(\$142,647)
TOTAL	(\$18,430,000)	\$56,011,083	\$23,209,889	\$80,790,982	(\$17,089,327)	\$43,721,655

EXHIBIT F

Exhibit No _____

**Appalachian Power Company
Depreciation Rates
Case No. 05-1278-E-PC-PW-42T**

	Current Rates	New Rates
<u>Steam Production</u>		
Mountaineer	2.64%	1.93%
Amos	2.79%	2.98%
Kanawha River	3.88%	1.19%
Sporn	4.86%	1.53%
Clinch River	3.48%	3.00%
Glyn Lyn 5	0.92%	4.99%
Glyn Lyn 6	3.71%	4.00%
<u>Hydro Production</u>		
Claytor	2.71%	1.17%
Byllesby	2.90%	2.89%
Buck	3.21%	2.95%
Niagara	2.31%	2.41%
Ruesens	1.69%	1.64%
Leesville	2.51%	1.21%
London	1.65%	1.85%
Marmet	1.65%	1.91%
Winfield	1.65%	1.76%
Smith Mountain	3.39%	1.29%
<u>Other Production</u>		
Central Maintenance	4.02%	2.07%
Central Machine	4.02%	2.10%
Little Broad Run	4.02%	1.76%
<u>Transmission Plant</u>	2.21%	1.63%
<u>Distribution Plant</u>	3.20%	3.37%
<u>General Plant</u>	3.14%	1.80%

EXHIBIT G

**SCHEDULE B
CENTURY ALUMINUM OF WEST VIRGINIA, INC.
MAXIMUM MONTHLY SURCHARGE ⁽¹⁾**

MONTHLY LME PRICE ⁽²⁾	MAXIMUM MONTHLY SURCHARGE ⁽³⁾
\$2200/tonne or less (\$0.998/lb or less)	Zero
\$2300/tonne (\$1.043/lb)	1.87 mills/kWh
\$2400/tonne (\$1.089/lb)	3.73 mills/kWh
\$2500/tonne (\$1.134/lb)	5.56 mills/kWh
\$2600/tonne (\$1.179/lb)	7.43 mills/kWh
\$2700/tonne (\$1.225/lb)	9.30 mills/kWh
\$2800/tonne (\$1.270/lb)	11.16 mills/kWh
\$2900/tonne (\$1.315/lb)	12.99 mills/kWh
\$3000/tonne (\$1.361/lb)	14.86 mills/kWh

- (1) The **Maximum Monthly Surcharge** shall remain in effect for the full term of this agreement, unless modified by Century Aluminum and approved by the PSC of West Virginia.
- (2) The **LME PRICE** shall be defined as the daily cash settlement for high grade aluminum, as quoted on the London Metal Exchange (as published by Reuters). The monthly LME Price shall be the simple average of the daily prices.
- (3) For LME prices not shown, the **Maximum Monthly Surcharge** may be interpolated between the points.

EXHIBIT F

**PUBLICLY-OWNED SEWER AND WATER UTILITIES
SUPPORTING INTERVENTION OF SOUTH PUTNAM PSD
AND HUNTINGTON SANITARY BOARD
THROUGH CONTRIBUTIONS UNDERWRITING
EXPERT WITNESS AND ATTORNEY FEES**

Bluewell Public Service District

Chelyan Public Service District

Culloden Public Service District

Fayetteville, Town of

Hodgesville Public Service District/
Tennerton Public Service District

Hurricane Water & Sanitary Board

Lavalette Public Service District

Logan County Public Service District

Oakvale Road Public Service District

Pea Ridge Public Service District

West Hamlin, Town of

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)

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Request STAFF-4

Refer to pages 23-24 of the Fayne Testimony concerning a "statewide solution" to address the issue of the price of electricity for the Sebree and Hawesville smelters.

- a. Describe the extent to which KIUC believes solutions of this type referenced by Mr. Fayne, i.e. a statewide economic development fund, tax credits, redistribution of the smelter load among multiple utilities, etc., will require legislative involvement.
- b. Describe the extent to which KIUC believes solutions of this type reference by Mr. Fayne are within the authority of the Commission.

RESPONSE

- a. Although it is not possible to determine what legal authority will be required to implement a statewide solution since that solution has not yet been determined, KIUC believes that it is likely that such a solution will require legislative involvement.
- b. KIUC believes that this Commission can be an active participant in and advocate for the development of a statewide solution, but that the Commission would not be able to unilaterally develop and implement such a solution.

Witness: Henry W Fayne

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Request STAFF-5

Provide a schedule that shows the annual production capacity of the Sebree smelter in both metric tons and pounds, and show the total annual revenues that would be generated from selling the annual capacity at each of the following prices per metric tonne of aluminum: \$1300; \$1800; \$2300; \$2800; and \$3000. Include all workpapers that support the calculations.

RESPONSE

Please see Exhibit Staff-5 on enclosed CD.

Witness: Henry W Fayne

COMMONWEALTH OF KENTUCKY
CASE NO. 2011-00036

SEBREE SMELTER

LME Price*	Production		Revenues (\$ millions) column 1 x column 2
	(Metric Tonnes)	Pounds	
1300	196,000	431,200,000	255
1800	196,000	431,200,000	353
2300	196,000	431,200,000	451
2800	196,000	431,200,000	549
3000	196,000	431,200,000	588

*LME Prices determined by Commission Staff

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Request STAFF-6

Provide a schedule that shows the annual production capacity of the Hawesville smelter in both metric tons and pounds, and show the total annual revenues that would be generated from selling the annual capacity at each of the following prices per metric tonne of aluminum: \$1300; \$1800; \$2300; \$2800; and \$3000. Include all workpapers that support the calculations.

RESPONSE

Please see Exhibit Staff-6 on enclosed CD.

Witness: Henry W Fayne

**COMMONWEALTH OF KENTUCKY
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HAWESVILLE SMELTER

LME Price*	Production		Revenues (\$ millions) column 1 x column 2
	(Metric Tonnes)	Pounds	
1300	244,000	536,800,000	317
1800	244,000	536,800,000	439
2300	244,000	536,800,000	561
2800	244,000	536,800,000	683
3000	244,000	536,800,000	732

*LME Prices determined by Commission Staff

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Request STAFF 7:

Testimony of Paul A. Coomes at page 3. The table on that page, at line 9, lists Refer to the Direct "Corporate income and license taxes, State of Kentucky \$350,000.

- a. Was this amount provided to Dr. Coomes by the smelters or was it estimated by Dr. Coomes? If it was estimated, provide a detailed explanation of how the amount was determined and include all work papers that support the estimate.
- b. Describe in detail the specific type of license taxes paid by each of the smelters to the State of Kentucky.

RESPONSE:

The corporate income and license taxes paid to Kentucky state government were provided by the aluminum companies. RioTinto reported \$350,000 in payments for 2010, and Century did not report any corporate income tax payments.

Witness: Paul Coomes

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Request STAFF-8

Refer to page 5 of the Direct Testimony of Dr. Matthew J. Morey ("Morey Testimony"). Dr. Morey states that the sale of energy to the smelters over the three years 2011-2013 will contribute an average net margin of approximately \$83 million per year more than can be obtained through Big Rivers' sale of energy to the wholesale market. Explain whether Dr. Morey believes that the smelters could achieve savings of this magnitude by purchasing energy directly from the wholesale market.

RESPONSE

I do not know what the Smelters could save by purchasing energy directly from the wholesale market. I have not conducted an analysis of that question. The fact that the wholesale market price in 2010 and the projected wholesale market price for the period 2011 – 2013 is below the effective price per kWh that the Smelters may pay during that same period under the rates proposed by BREC in this rate case, if such rates are approved by the Commission, suggests that they would be able to achieve some level of savings. But the price the Smelters would pay to purchase power from the wholesale market for firm service would entail several factors that will influence the ultimate price. I do not know what influence those factors would have on the price per kWh that the Smelters would pay.

Witness: Mathew J. Morey

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Request STAFF-9

Refer to the Morey Testimony at page 6, line 11. Dr. Morey states that Big Rivers would only be able to sell an average of about 4,200 GWh per year in the wholesale market and, further, that Big Rivers' generating units are frequently "out of the market." Provide all supporting documentation and the calculations performed to support this claim and explain the meaning of the phrase "out of the market" as used in the testimony.

RESPONSE

Please see KIUC Response to BREC 35, and the spreadsheet labeled Margin Analysis.xls on the CD accompanying this response for all supporting documentation and calculations performed to support this claim. The frequencies with which BREC generation units are in and out of the market are reported in the range C8774:L8778 on each of the three annual results pages (sheet tabs 2011, 2012 and 2013) of Margin Analysis.xls. (See CONFIDENTIAL CD Response to BREC-35 filed under seal).

The phrase "out of the market" means that the incremental (or marginal) cost of the generation at the busbar connection to the grid is above the locational marginal price (i.e., the market price) at the commercial node or interface/interconnection.

Witness: Mathew J. Morey

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Request STAFF-10.

Refer to the Morey Testimony at page 15, lines 1-9. Dr. Morey discusses why he did not extend his analysis beyond 2014. With new federal environmental requirements going into effect in 2014 and 2015 and their potential impact on the cost of electricity, explain whether the impact of these changes should be considered and what that impact might be to Big Rivers' opportunities in the wholesale market.

RESPONSE

For the purposes of my analysis, new federal environmental requirements going into effect beyond 2014 do not need to be considered. The purpose of my analysis was to demonstrate that margin contribution of the Smelters to BREC revenue recovery is significant, and loss of the Smelter load would create financial difficulty for BREC over the course of several years.

The environmental requirements going into effect in 2014 and 2015 may have a broadly felt impact on the cost of electricity within the MISO market and elsewhere around the country. With those requirements imposed on BREC as well as many other utilities with coal-fired generation technologies, the cost of producing electricity from coal may rise, and along with it the price of electricity in the MISO wholesale market during hours when such units set the market price. An analysis of whether BREC would be made relatively better off or worse off under these environmental requirements vis-à-vis the sale of its surplus energy in the wholesale market would depend on a host of assumptions. The loss of Smelter load under these circumstances would still require BREC to be selling substantially more power in the wholesale market than it currently sells at prices at or above the rates it would be receiving from the Smelters.

Witness: Mathew J. Morey

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Request STAFF-11

Refer to the Morey Testimony, Exhibit MJM-3, which shows that during the period 2011-2013, the smelters will pay Big Rivers a total of \$1,115,513,000. Based on Dr. Morey's analysis of prices in the wholesale energy market, how much would the smelters pay over this same time period if their energy purchases were from the wholesale market rather than from Big Rivers?

RESPONSE

The question asks me to conduct an analysis of Smelter purchases in the wholesale market but does not specify whether I am to consider the day-ahead spot market, the real-time spot market or the bilateral market. Prices in the day-ahead spot and real-time spot markets vary by the hour. The question asks me to perform an original analysis to provide a response, which I am not in a position to conduct. With regard to an analysis of Smelter purchases of firm power through the bilateral market, I am not in possession of data on bilateral energy market prices. Based strictly on the information contained in Exhibit MJM-3, an estimate of the amount that the Smelters would pay for 7,300 GWh of energy in each of the three years of the study period (2011-2013) can be obtained by multiplying the 7,300 GWh by the corresponding Average Market Prices (\$/MWh) for each year. The result of this computation for each year of the study period is presented in the table below.

Table 1 – Response to CS 11 – Computation of Smelter Energy Cost at Average Market Prices - 2011 to 2013

		2011	2012	2013	Total
1	Sales To Smelters (MWh)	7,300,000	7,300,000	7,300,000	
2	Average Market Prices (\$/MWh)	\$38	\$41	\$42	
3 (1 x 2)	Smelter Market Cost	\$277,400,000	\$299,300,000	\$306,600,000	\$883,300,000

Witness: Mathew J. Morey

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Request STAFF-12

Refer to the Morey Testimony. State any impact the Vectren transmission line approved by the Kentucky State Board on Generating and Transmission Siting in Case No. 2010-00223¹ would have on Big Rivers' position in the wholesale market and whether that impact was taken into consideration in Dr. Morey's analysis.

RESPONSE

I have not studied the impact of the Vectren transmission line on energy flows from BREC's generation units to either its loads or the MISO market in general. Therefore, I cannot state what the impact of the Vectren transmission line will have on Big Rivers' position in the wholesale market.

I have not taken the Vectren transmission line into consideration in my analysis. My analysis assumes that there are no constraints on transmission that would restrict the sale of energy from BREC's generation units to the MISO wholesale market. Consequently, my analysis overstates the revenues that BREC would receive from off-system sales to the wholesale market.

Witness: Mathew J. Morey

¹ Case No. 2010-00223, Application of Southern Indiana Gas and Electric Co. D/B/A Vectren Energy Delivery of Indiana, Inc. for a Certificate to Construct an Electric Transmisosn Line from it's A.B. Brown Plant to the Big Rivers Reid EHV Station (Ky. PSC Dec. 21, 2010).

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Request STAFF-13

Refer to page 11 of the Direct Testimony of Charles W. King and Schedule 1 of Exhibit (CWK-1). Both the testimony and exhibit indicate that Mr. King's determination of KIUC's recommended depreciation rates pertains only to Big Rivers' production plant. However, there is no discussion of why his analysis was limited to production plant. Clarify whether the lack of discussion of depreciation on transmission or general plant should be interpreted to mean that KIUC takes no exception to Big Rivers' proposed depreciation rates for transmission and general plant.

RESPONSE:

Mr. King was not retained to address the non-production accounts.

Witness: Charles W. King

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Request STAFF-14

Refer to pages 10-1 1 of the Direct Testimony and Exhibits of Lane Kollen ("Kollen Testimony"), specifically, the discussion of Big Rivers' proposal for the current recovery of interest of Construction Work in Progress ("CWIP").

- a. Explain whether Mr. Kollen is aware that the current recovery of interest on CWIP has been authorized by the Commission for East Kentucky Power Cooperative, Inc. ("EKPC") and, for Louisville Gas and Electric Company and Kentucky Utilities Company, the Commission has authorized a current return on CWIP in lieu of accruing an Allowance for Funds Used During Construction ("AFUDC").
- b. Mr. Kollen offers three reasons for opposing Big Rivers' proposal. Explain whether Mr. Kollen agrees that:
 - (1) Current recovery of, or expensing, interest on CWIP results in the final installed cost of a construction project being lower than if recovery were deferred through the capitalizing of interest on CWIP.
 - (2) Not capitalizing interest on CWIP, or not accruing AFUDC, results in a lower revenue requirement associated with a given construction project, or item of utility plant, over the life of the item of utility plant.

RESPONSE:

- a. Yes. However, the circumstances with Big Rivers are different than with those other utilities because of the terms of the Smelter contracts and the fact that the Big Rivers revenue requirement is set based on the contract TIER as defined in those contracts and that deficiencies in the contract TIER can be recovered from the Smelters, subject to certain conditions. The contract TIER reflects a reduction in interest expense for AFUDC. If there is no AFUDC, then the interest expense is greater and the contract TIER revenue requirement is greater. If the Smelter TIER Adjustment Charge already is at the maximum, then Big Rivers has no ability to recover the interest expense that would have been capitalized and recovered in the future; the ability to recover this interest expense is lost forever. Consequently, the Company's proposal exerts greater financial pressure on the utility. This is not a good idea.
- b.(1) Yes. However, the lower installed cost is illusory because that single measure ignores the fact that the carrying costs actually were incurred and were recovered from ratepayers, albeit prematurely. The carrying cost during construction is properly considered a capital

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cost and is no different than the cost of materials and labor. Another problem with providing current recovery of carrying costs during construction is that it violates the matching principle. It requires the payment of a portion of the capital cost before the assets are placed in service instead of over the service lives of those assets when they provide service.

- b.(2) No. Conceptually, on a net present value basis, the revenue requirement is the same, although, as a practical matter, there may be some difference because the base ratemaking process does not provide real-time recovery. The question assumes that the revenue requirement does not start until the assets are placed in service. This is not correct because the revenue requirement for the test year starts when the interest on the construction amounts is included in rates, not when the interest on the completed cost amounts is included.

Witness: Lane Kollen

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Request STAFF-15

Refer to pages 14-16 of the Kollen Testimony, which address the inflation portion of Big Rivers' proposed adjustment to non-outage related maintenance expense. Mr. Kollen's recommendation allows for the recognition of the 2011 inflation calculated by Big Rivers. On page 16, beginning on line 3, Mr. Kollen states, "At most, such an adjustment should be limited to the year immediately following the test year..." On the same page, on line 9, Mr. Kollen states that Big Rivers' "[e]stimate of inflation during 2012-2014 is not known and measurable" Explain how Mr. Kollen determined that Big Rivers' 2011 estimate of inflation was known and measurable and why it should be reflected in the adjustment to non-outage related maintenance expense.

RESPONSE:

Mr. Kollen agrees that 2011 also is not known and measurable, but conceded the 2011 inflation in the context of his other recommendations and his assessment of the overall result of the revenue requirement recommended by KIUC. Mr. Kollen recognizes that there is a balance between rigid adherence to the cost structure in the historical test year and the need to provide revenue sufficient to cover the present and ongoing cost structure of the utility.

Witness: Lane Kollen

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Request STAFF-16

Refer to pages 17-19 of the Kollen Testimony regarding Big Rivers' proposal to include depreciation on CWIP in its pro forma depreciation expense and his recommendation to exclude depreciation on post test-year plant retirements from the pro forma depreciation expense. Refer also to pages 20-21 of the Kollen Testimony where he discusses KIUC's proposed adjustment to Big Rivers' depreciation expense.

- a. Given the nature of Big Rivers' proposal, explain why Mr. Kollen chose to link depreciation on retirements with depreciation on CWIP rather than recommend that the proposal to include depreciation on CWIP be rejected.
- b. Provide the calculation of Big Rivers' pro forma depreciation expense based on KIUC's proposed depreciation rates being applied to Big Rivers' test year-end plant in service without including the year-end CWIP balance.

RESPONSE:

- a. The nature of the adjustment to include depreciation on CWIP is more appropriately considered as a post test year adjustment to plant in service for CWIP that was completed within six months after the end of the historic test year. Mr. Kollen recognizes that there was some growth in plant in service due to additions in excess of plant retirements in the six months after the end of the historic test year. This net increase in gross plant necessarily causes an increase in depreciation expense and thus, in the utility's cost structure. In the case of a cooperative, whose rates are set on the basis of TIER, the interest on the CWIP, to the extent not offset by AFUDC, is recovered; it matters not that the CWIP is not plant in service. However, the depreciation expense does not commence until the CWIP is completed and transferred to plant in service. Similar to Mr. Kollen's rationale in support of the 2011 inflation increase on maintenance expense, Mr. Kollen considered this issue in the context of his other recommendations and the overall result. The objective is to ensure that Big Rivers recovers sufficient revenues for its cost structure to the extent that the costs are just and reasonable.
- b. Please refer to the file on the enclosed CD labeled "Depr wo CWIP."

Witness: Lane Kollen

KIUC Adjustment to Depreciation Expense

ACCT	BALANCE 10/31/2010	COMPANY'S NEW YEARLY RATE	COMPANY'S NEW DEPRECIATION RATE	COMPANY'S PRO FORMA DEPRECIATION EXPENSE	VARIANCE	KIUC NEW YEARLY RATE	KIUC NEW DEPRECIATION RATE	KIUC PRO FORMA DEPRECIATION EXPENSE	KIUC ADJUSTMENT
3010	419.82	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3020	66,475.65	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3030	0.00	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3101	83,342.47	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3102	1,124,664.82	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3103	1,110,711.72	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3104	2,218,857.54	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3111	3,236,944.36	1.38	0.001150	44,669.83	(10,681.92)	1.17	0.000975	37,872.25	(6,797.58)
3112	18,977,054.83	1.38	0.001150	261,883.36	(62,624.28)	1.17	0.000975	222,031.54	(39,851.82)
3113	26,723,028.18	1.38	0.001150	368,777.79	(88,185.99)	1.17	0.000975	312,659.43	(56,118.36)
3114	73,073,034.47	1.38	0.001150	1,008,407.88	(241,141.01)	1.17	0.000975	854,954.50	(153,453.38)
3115	421,179.00	1.38	0.001150	5,812.27	(1,389.89)	1.17	0.000975	4,927.79	(884.48)
3116	577,533.07	1.38	0.001150	7,969.96	(1,905.86)	1.17	0.000975	6,757.14	(1,212.82)
3117	937,856.03	1.38	0.001150	12,942.41	(3,094.93)	1.17	0.000975	10,972.92	(1,969.49)
3119	693,609.79	1.38	0.001150	9,571.82	(2,288.91)	1.17	0.000975	8,115.23	(1,456.59)
3120	29,686.39	1.88	0.001567	558.10	26.59	1.54	0.001283	457.17	(100.93)
312A	220,240.55	2.28	0.001900	5,021.48	858.93	1.95	0.001625	4,294.69	(726.79)
3121	7,193,006.17	1.88	0.001567	135,228.52	6,444.94	1.54	0.001283	110,772.30	(24,456.22)
312B	5,061,431.08	2.28	0.001900	115,400.63	19,739.58	1.95	0.001625	98,697.91	(16,702.72)
3122	77,143,667.49	1.88	0.001567	1,450,300.95	69,120.73	1.54	0.001283	1,188,012.48	(262,288.47)
312C	121,989,593.12	2.28	0.001900	2,781,362.72	475,759.41	1.95	0.001625	2,378,797.07	(402,565.65)
3123	161,617,029.17	1.88	0.001567	3,038,400.15	144,808.86	1.54	0.001283	2,488,902.25	(549,497.90)
312D	113,968,704.31	2.28	0.001900	2,598,486.46	444,477.95	1.95	0.001625	2,222,389.73	(376,096.73)
3124	402,071,586.26	1.88	0.001567	7,558,945.82	360,256.14	1.54	0.001283	6,191,902.43	(1,367,043.39)
312E	268,650,680.12	2.28	0.001900	6,125,235.51	1,047,737.66	1.95	0.001625	5,238,688.26	(886,547.25)
3125	17,389,606.87	1.88	0.001567	326,924.61	15,581.09	1.54	0.001283	267,799.95	(59,124.66)
312F&312K	71,086,231.78	2.28	0.001900	1,620,766.08	277,236.30	1.95	0.001625	1,386,181.52	(234,584.56)
3126	2,554,464.97	1.88	0.001567	48,023.94	2,288.80	1.54	0.001283	39,338.76	(8,685.18)
312G	1,899,172.74	2.28	0.001900	43,301.14	7,406.78	1.95	0.001625	37,033.87	(6,267.27)
3127	376,268.58	1.88	0.001567	7,073.85	337.14	1.54	0.001283	5,794.54	(1,279.31)
3128	1,186,252.75	1.88	0.001567	22,301.55	1,062.88	1.54	0.001283	18,268.29	(4,033.26)
312J	15,438.27	2.28	0.001900	351.99	60.21	1.95	0.001625	301.05	(50.94)
3140	0.00	1.91	0.001592	0.00	0.00	1.54	0.001283	0.00	0.00
3141	4,310,530.58	1.91	0.001592	82,331.13	10,793.56	1.54	0.001283	66,382.17	(15,948.96)
3142	32,762,390.07	1.91	0.001592	625,761.65	82,037.02	1.54	0.001283	504,540.81	(121,220.84)
3143	57,679,599.22	1.91	0.001592	1,101,680.35	144,429.72	1.54	0.001283	888,265.83	(213,414.52)
3144	127,883,751.07	1.91	0.001592	2,442,579.65	320,220.92	1.54	0.001283	1,969,409.77	(473,169.88)
3145	4,991,571.10	1.91	0.001592	95,339.01	12,498.90	1.54	0.001283	76,870.19	(18,468.82)
3146	262,741.29	1.91	0.001592	5,018.36	657.91	1.54	0.001283	4,046.22	(972.14)
3147	18,495.15	1.91	0.001592	353.26	46.31	1.54	0.001283	284.83	(68.43)
3151	1,494,658.69	1.99	0.001658	29,743.71	5,835.15	1.08	0.000900	16,142.31	(13,601.40)
3152	8,552,676.77	1.99	0.001658	170,198.27	33,389.65	1.08	0.000900	92,368.91	(77,829.36)
3153	16,091,239.72	1.99	0.001658	320,215.67	62,820.20	1.08	0.000900	173,785.39	(146,430.28)
3154	35,070,442.41	1.99	0.001658	697,901.80	136,915.00	1.08	0.000900	378,760.78	(319,141.02)
3155	171,384.26	1.99	0.001658	3,410.55	669.09	1.08	0.000900	1,850.95	(1,559.60)
3159	43,548.07	1.99	0.001658	866.61	170.02	1.08	0.000900	470.32	(396.29)
3160	56,008.08	3.78	0.003150	2,117.11	1,092.16	3.77	0.003142	2,111.50	(5.61)
3161	1,227.09	3.78	0.003150	46.38	23.92	3.77	0.003142	46.26	(0.12)

KIUC Adjustment to Depreciation Expense

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3162	849,312.17	3.78	0.003150	32,104.00	16,561.59	3.77	0.003142	32,019.07	(84.93)
3163	779,447.85	3.78	0.003150	29,463.13	15,199.23	3.77	0.003142	29,385.18	(77.95)
3164	749,577.26	3.78	0.003150	28,334.02	14,616.76	3.77	0.003142	28,259.06	(74.96)
3165	345,677.46	3.78	0.003150	13,066.61	6,740.71	3.77	0.003142	13,032.04	(34.57)
3166	308,147.79	3.78	0.003150	11,647.99	6,008.89	3.77	0.003142	11,617.17	(30.82)
3167	88,777.93	3.78	0.003150	3,355.81	1,731.17	3.77	0.003142	3,346.93	(8.88)
3169	107,699.80	3.78	0.003150	4,071.05	2,100.14	3.77	0.003142	4,060.28	(10.77)
3401	0.00	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3410	154,232.79	1.17	0.000975	1,804.52	(1,758.26)	1.17	0.000975	1,804.52	0.00
3420	1,436,911.63	9.10	0.007583	130,758.96	97,428.36	9.10	0.007583	130,758.96	0.00
3430	4,915,885.63	3.02	0.002517	148,459.75	27,057.04	3.02	0.002517	148,459.75	0.00
3440	1,102,963.67	0.50	0.000417	5,514.82	(19,076.86)	0.50	0.000417	5,514.82	0.00
3450	383,519.62	2.05	0.001708	7,862.15	(688.80)	2.05	0.001708	7,862.15	0.00
3460	0.00	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3500	13,151,946.52	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3501	704,868.36	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3520	5,817,594.61	1.90	0.001583	110,534.30	8,121.36	1.90	0.001583	110,534.30	0.00
3521	20,369.05	1.90	0.001583	387.01	28.43	1.90	0.001583	387.01	0.00
3522	157,304.64	1.90	0.001583	2,988.79	219.60	1.90	0.001583	2,988.79	0.00
3524	679,442.21	1.90	0.001583	12,909.40	948.50	1.90	0.001583	12,909.40	0.00
3530	78,645,358.50	2.23	0.001858	1,753,791.49	7,864.53	2.23	0.001858	1,753,791.49	0.00
3531	3,031,650.37	2.23	0.001858	67,605.80	303.16	2.23	0.001858	67,605.80	0.00
3532	5,573,659.91	2.23	0.001858	124,292.62	557.37	2.23	0.001858	124,292.62	0.00
3533	5,947,214.37	2.23	0.001858	132,622.88	594.72	2.23	0.001858	132,622.88	0.00
3534	22,364,145.19	2.23	0.001858	498,720.44	2,236.42	2.23	0.001858	498,720.44	0.00
3540	8,134,239.23	1.42	0.001183	115,506.20	(69,954.45)	1.42	0.001183	115,506.20	0.00
3541	146,747.32	1.42	0.001183	2,083.81	(1,262.03)	1.42	0.001183	2,083.81	0.00
3550	42,097,383.75	2.06	0.001717	867,206.11	(496,749.12)	2.06	0.001717	867,206.11	0.00
3551	234,314.24	2.06	0.001717	4,826.87	(2,764.91)	2.06	0.001717	4,826.87	0.00
3560	43,673,282.78	1.69	0.001408	738,078.48	(340,476.91)	1.69	0.001408	738,078.48	0.00
3561	86,900.75	1.69	0.001408	1,468.62	(677.48)	1.69	0.001408	1,468.62	0.00
3890	407,251.23	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3900	3,948,933.89	2.84	0.002367	112,149.72	9,888.13	2.84	0.002367	112,149.72	0.00
3910	589,902.92	17.12	0.014267	100,991.38	94,443.46	17.12	0.014267	100,991.38	0.00
3912	7,163,171.79	10.29	0.008575	737,090.38	657,579.17	10.29	0.008575	737,090.38	0.00
3913	0.00	0.00	0.000000	0.00	0.00	0.00	0.000000	0.00	0.00
3916	1,894.73	17.12	0.014267	324.38	303.35	17.12	0.014267	324.38	0.00
3917	3,059.60	17.12	0.014267	523.80	489.84	17.12	0.014267	523.80	0.00
3922	1,764,679.12	4.39	0.003658	77,469.41	(21,698.50)	4.39	0.003658	77,469.41	0.00
3923	1,257,239.84	6.14	0.005117	77,194.53	6,542.68	6.14	0.005117	77,194.53	0.00
3930	98,765.68	4.40	0.003667	4,345.69	819.76	4.40	0.003667	4,345.69	0.00
3940	722,077.41	4.61	0.003842	33,287.77	12,708.56	4.61	0.003842	33,287.77	0.00
3950	221,278.64	4.41	0.003675	9,758.39	3,430.71	4.41	0.003675	9,758.39	0.00
3960	342,907.40	3.70	0.003083	12,687.57	1.37	3.70	0.003083	12,687.57	0.00
3961	183,073.76	3.70	0.003083	6,773.73	0.73	3.70	0.003083	6,773.73	0.00
3970	1,640,119.50	4.35	0.003625	71,345.20	0.00	4.35	0.003625	71,345.20	0.00
3980	165,070.19	11.80	0.009833	19,478.28	10,499.12	11.80	0.009833	19,478.28	0.00
3986	0.00	11.80	0.009833	0.00	0.00	11.80	0.009833	0.00	0.00

KIUC Adjustment to Depreciation Expense

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3987	1,625.49	11.80	0.009833	191.81	103.39	11.80	0.009833	191.81	0.00
312 L-P	3,208,938.00	20.22	0.016850	648,847.26	588,198.33	19.31	0.016092	619,645.93	(29,201.33)
312 V-Z	868,755.00	14.39	0.011992	125,013.84	109,459.65	19.31	0.016092	167,756.59	42,742.75
3525	185,107.45	1.90	0.001583	3,517.04	258.41	1.90	0.001583	3,517.04	0.00
3535	6,511,340.66	2.23	0.001858	145,202.90	651.14	2.23	0.001858	145,202.90	0.00
3545	312,557.79	1.42	0.001183	4,438.32	(2,688.00)	1.42	0.001183	4,438.32	0.00
3555	79,206.80	2.06	0.001717	1,631.66	(934.64)	2.06	0.001717	1,631.66	0.00
3565	104,571.36	1.69	0.001408	1,767.26	(815.23)	1.69	0.001408	1,767.26	0.00
Total - No CWIP Included	<u>1,942,558,139.59</u>			<u>40,218,778.28</u>	<u>4,017,641.32</u>			<u>34,367,973.80</u>	<u>-5,850,804.48</u>

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)**

**KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST
PSC CASE NO. 2011-00036
June 22, 2011**

Request STAFF-17

Refer to pages 19-20 of the Kollen Testimony regarding his recommended reduction to Big Rivers' Transmission of Electricity by Others Expense and to Exhibit LK-11.

- a. The testimony states that, since Big Rivers has proposed post-test year adjustments that increase its revenue requirement, the Commission should consider Mr. Kollen's proposed post-test year adjustment because it decreases Big Rivers' revenue requirement. Explain whether there are other reasons which support the Commission's consideration of this adjustment.
- b. The exhibit, a response to a KIUC data request, indicates that in addition to costs incurred for transmission service provided in the test year by the Tennessee Valley Authority ("TVA"), Big Rivers also incurred costs for transmission service provided by the Midwest ISO. However, the budgeted amount upon which Mr. Kollen bases his proposed adjustment reflects only TVA transmission service. Explain whether or not Mr. Kollen has made an independent determination that Big Rivers will not incur costs in the future for transmission service provided by entities other than TVA.

RESPONSE:

- a. Yes. The Company did not include this amount of expense in its 2011 budget or multi-year financial forecast.
- b. No. Mr. Kollen relied on Big Rivers for this assumption.

Witness: Lane Kollen

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Request STAFF-18

Refer to pages 30-33 of the Kollen Testimony which cover KIUC's proposal that Big Rivers be required to retire patronage capital on an annual basis equal to 25 percent of its prior year's margin. Explain, specifically, how 25 percent was chosen as compared to some other percentage.

RESPONSE:

Mr. Kollen chose the 25% because that is the maximum distribution that Big Rivers may make pursuant to its borrowing covenants with CoBank. It is Mr. Kollen's informed judgment that a 25% patronage capital distribution would be appropriate in light of its very strong equity capital percentage when compared to other G&T cooperatives. By way of comparison, NRECA uses a 50% factor. Big Rivers must carefully balance its financial health, its cost structure, and the rates necessary to recover its costs. The margin each year represents the amounts that the utility charged its member-owners in excess of its actual costs. These amounts belong to the member-owners, but also represent a source of capital for the utility. Recoveries from ratepayers in excess of the utility's costs are reported as margins on the utility's income statement and allow the utility to meet its required financial metrics, including MFIR and DSC. The margins, which were recognized through the utility's income statement, add to the utility's patronage capital. Unlike the margins, the retirements are not recognized through the utility's income statement. Thus, rates in excess of costs contribute to the utility's financial health and enable it to meet its required financial metrics, but retirements of patronage capital can be used to mitigate the effect of rates in excess of costs without harming the utility's financial health.

Witness: Lane Kollen

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Request STAFF-19

Refer to the Direct Testimony of Stephen J. Baron ("Baron Testimony") at page 14. Mr. Baron recommends using a 6 Coincident Peak ("CP") demand methodology to allocate production demand related costs, such as that used by Mr. Seelye for EKPC in Case No. 2008-00409.²

- a. Explain why the 6 CP methodology is not less appropriate for Big Rivers than for EKPC given the share of Big Rivers' total load for which the smelters are responsible and the relative uniformity of the average demand of the smelters.
- b. Provide a side-by-side comparison of the resultant wholesale rates for each Big Rivers rate class under the 6 CP and 12 CP methodologies, absent any other adjustments.

RESPONSE:

- a. The relevant issue to consider in evaluating the "cost causative" factors associated with production demand (fixed generating plant revenue requirements and purchased power capacity costs) is the influence of customer loads at the time of the system peaks used by Big Rivers to determine the need for capacity. Based on Big Rivers IRP, the summer peak demand and, to a lesser extent, winter peak demands determine the need for capacity. Because of the near constant load of the Smelters (assumed 98% load factor), coupled with the fact that the Smelters comprise 70% of the total system load, Big Rivers' monthly peaks are relatively flat during the year. However, this does not change the fact that peak loads during the summer and winter months drive the need for capacity on the system. It does not matter, in this evaluation, whether the July, August or December peaks are only 200 MW greater than off-peak months such as April or October. What does matter is whether an increase in peak load during the summer or winter months (corresponding to the 6 CP used in the KIUC analysis) impacts the need for capacity on the system – the answer is that it does, while increases in the off-peak months do not cause a need for capacity (unless such an increase causes the off-peak months to become the peak month). Consider a system that is comprised of two customer classes. The first, class A, has a 100% load factor load of 90 MW. Class B has 10 MW of load only during the three summer month and three winter months, 0 MW of load in the other months. The Figure 1 below shows a plot of the monthly peaks.

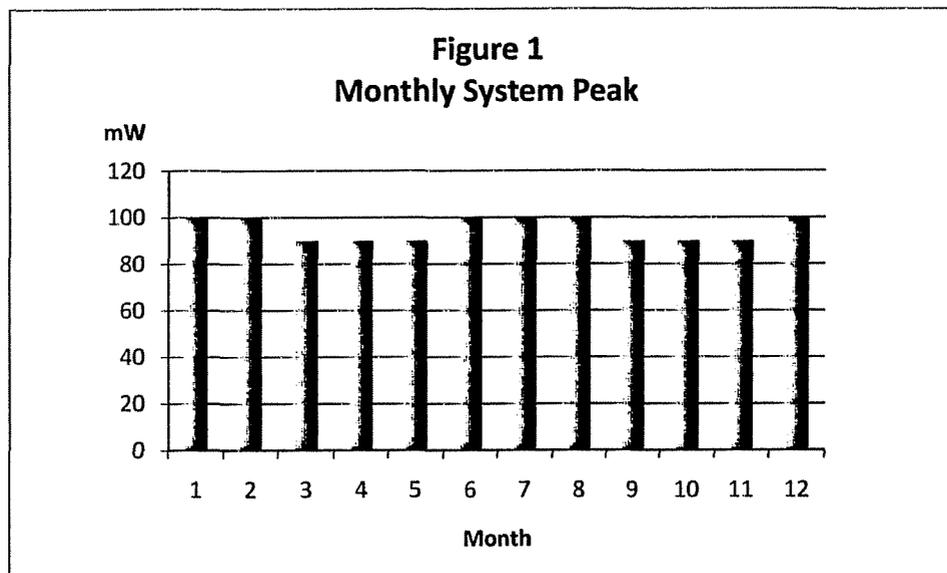
² Case No. 2008-00409, General Adjustment of Electric Rates of East Kentucky Power Cooperative, Inc. (Ky. PSC Mar. 31, 2009).

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Looking at this chart, the 12 monthly peaks are almost identical – yet it is the system peak load that occurs during the summer and winter months that determines the need for and investment in capacity on the system. This would indicate that a rational allocation method for this utility would be the class contribution to the three summer and three winter peaks (6 CP). In the same manner, on the Big Rivers system, class contributions to the three summer and three winter peaks is a reasonable measure of cost responsibility, irrespective of the size of the high load factor Smelter load.

- b. See Table 1 below that shows a comparison of the revenue increases using the KIUC methodology without any KIUC revenue requirement adjustments, for each rate class under both the KIUC 6 CP and 12 CP cost of service studies. Because the KIUC class cost of service studies were developed with the full Smelter test year revenues (i.e., no pro-forma adjustment to move the Smelters to the mid-point of the TIER Adjustment), the overall Big Rivers' requested revenue increase is reduced by \$7,114,653 to an increase of \$32,839,312. Also attached is the spreadsheet used to develop Table 1.

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Table1					
6 CP vs. 12 CP - Using KIUC Cost of Service Studies					
Line	6 CP	Total System	Rurals	Large Industrials	Smelters
1	Subsidy at Present Rates	-	(18,319,114)	(50,193)	18,369,307
2	Big Rivers Requested Revenue Increase*	32,839,312			
3	Eliminate Subsidy to Rurals	18,319,114	18,319,114	-	-
4	Spread of Increase Remainder	14,520,198	3,969,904	1,372,143	9,178,151
5	Step 1 Increase - Rurals Subsidy	<u>18,319,114</u>	<u>18,319,114</u>	<u>-</u>	<u>-</u>
6	Net Increase	<u>32,839,312</u>	<u>22,289,018</u>	<u>1,372,143</u>	<u>9,178,151</u>
12 CP					
1	Subsidy at Present Rates	-	(13,242,103)	(552,120)	13,794,223
2	Big Rivers Requested Revenue Increase*	32,839,312			
3	Eliminate Subsidy to Rurals	13,242,103	13,242,103	-	-
4	Spread of Increase Remainder	19,597,209	5,357,988	1,851,915	12,387,307
5	Step 1 Increase - Rurals Subsidy	<u>13,242,103</u>	<u>13,242,103</u>	<u>-</u>	<u>-</u>
6	Net Increase	<u>32,839,312</u>	<u>18,600,090</u>	<u>1,851,915</u>	<u>12,387,307</u>
* Reflects KIUC Cost of Service Study use of full Smelter revenues (i.e., no pro-forma TIER Adjustment)					

Witness: Stephen J. Baron

Big Rivers Electric Corporation

Analysis of Rate Increase Scenario

6 CP Cost of Service using Seelye model with TIER Adjustment at \$1.95

Line	Total		Large		Smelters
	System		Rurals	Industrials	
1	Rate Base - 6 CP	1,170,341,502 \$	390,335,625 \$	96,406,419 \$	683,599,459
2	Net Utility Operating Margin	25,806,684 \$	(9,711,995) \$	2,075,623 \$	33,443,057
3	Return on Rate Base	2.21%	-2.49%	2.15%	4.89%
4	Subsidy at Present Rates	-	(18,319,114)	(50,193)	18,369,307
5	Adjusted Total Increase Required*	32,839,312			
	Rate Base -12 CP	1,170,341,502 \$	359,504,551 \$	99,270,357 \$	711,566,594
	Net Utility Operating Margin	25,806,684 \$	(5,314,827) \$	1,636,847 \$	29,484,664
	Return on Rate Base	2.21%	-1.48%	1.65%	4.14%
	Subsidy at Present Rates	-	(13,242,103)	(552,120)	13,794,223
	Adjusted Total Increase Required*	32,839,312			

* Big Rivers, as-filed with full test-year Smelter TIER Adjustment revenues

Table1**6 CP vs. 12 CP - Using KIUC Cost of Service Studies**

Line	6 CP	Total	Large		Smelters
		System	Rurals	Industrials	
1	Subsidy at Present Rates	-	(18,319,114)	(50,193)	18,369,307
2	Big Rivers Requested Revenue Increase*	32,839,312			
3	Eliminate Subsidy to Rurals	18,319,114	18,319,114	-	-
4	Spread of Increase Remainder	14,520,198	3,969,904	1,372,143	9,178,151
5	Step 1 Increase - Rurals Subsidy	<u>18,319,114</u>	<u>18,319,114</u>	<u>-</u>	<u>-</u>
6	Net Increase	<u><u>32,839,312</u></u>	<u><u>22,289,018</u></u>	<u><u>1,372,143</u></u>	<u><u>9,178,151</u></u>
12 CP					
1	Subsidy at Present Rates	-	(13,242,103)	(552,120)	13,794,223
2	Big Rivers Requested Revenue Increase*	32,839,312			
3	Eliminate Subsidy to Rurals	13,242,103	13,242,103	-	-
4	Spread of Increase Remainder	19,597,209	5,357,988	1,851,915	12,387,307
5	Step 1 Increase - Rurals Subsidy	<u>13,242,103</u>	<u>13,242,103</u>	<u>-</u>	<u>-</u>
6	Net Increase	<u><u>32,839,312</u></u>	<u><u>18,600,090</u></u>	<u><u>1,851,915</u></u>	<u><u>12,387,307</u></u>

* Reflects KIUC Cost of Service Study use of full Smelter revenues (i.e., no pro-forma TIER Adjustment)

10,675,114,974	<u>2,449,147,804</u>	<u>928,887,170</u>	<u>7,297,080,000</u>
1	0.229425895	0.087014254	0.683559851

Big Rivers Electric Corporation

6 CP Cost of Service using Seelye model with TIER Adjustment at test year level of \$1.95

Line	6 CP	Total System	Rurals	Large Industrials	Smelters
1	Rate Base - 6 CP	1,170,341,502	390,335,625	96,406,419	683,599,459
2	Net Utility Operating Margin	25,806,684	(9,711,995)	2,075,623	33,443,057
3	Return on Rate Base	2.21%	-2.49%	2.15%	4.89%
4	Subsidy at Present Rates	-	(18,319,114)	(50,193)	18,369,307
5	KIUC Proposed Revenue Increase	32,839,312			
6	Eliminate Subsidy to Rurals	18,319,114	18,319,114	-	-
7	Remainder of Increase to be Allocated	14,520,198			
8	Demand/Energy Base Revenue - Current Rates	118,930,921	88,490,963	30,439,958	
9	Weather Normalization Adjustment	(421,610)	(421,610)	-	
10	Base Rate Revenue	322,119,734	88,069,353	30,439,958	203,610,423
11	Revenue Allocator using Smelter/Industrial Ratio	322,119,734	88,069,353	30,439,958	203,610,423
12	Percent Allocator	100.00%	27.34%	9.45%	63.21%
13	Spread of Increase Remainder	14,520,198	3,969,904	1,372,143	9,178,151
14	Step 1 Increase - Rurals Subsidy	18,319,114	18,319,114	-	-
15	Net Increase (before Rural Reserve or Capital Credits)	<u>32,839,312</u>	<u>22,289,018</u>	<u>1,372,143</u>	<u>9,178,151</u>

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST
PSC CASE NO. 2011-00036
June 22, 2011

Request STAFF-20.

Refer to the Baron Testimony at page 20. Starting at line 14, Mr. Baron states that the smelter rates will automatically increase on January 1, 2012 by \$.30 per MWh, or approximately \$2.2 million, and that the \$2.2 million "increase will flow directly to the Rural and Large Industrial customer classes." Explain the reason for the automatic increase and how the increase will flow to the non-smelter classes.

RESPONSE:

The increase occurs on January 1, 2012 automatically pursuant to the provisions of Section 4.11(a) of each Smelter Agreement (Surcharges). These amounts paid by the Smelters pursuant to Section 4.11(a) flow through as credits to Rural and Large Industrial customer classes pursuant to Big Rivers' Rate "US" (Unwind Surcredit).

Witness: Stephen J. Baron

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST
PSC CASE NO. 2011-00036
June 22, 2011

Request STAFF-21

Refer to page 29 of the Baron Testimony, lines 3-1 9. KIUC recommends that the Rural Economic Reserve ("RER") be used annually to partially offset the rate increase proposed by KIUC in this case.

- a. Mr. Baron states that the Commission Order in Case No. 2007- 004553 "intended that the fund be used to mitigate the impact of future FAC and Environmental Surcharge increases." Provide the citation of the Order wherein this intention was stated.
- b. Mr. Baron proposes to withdraw approximately \$4.2 million annually from the RER fund to mitigate the Rural revenue increase proposed by KIUC, while stating that the Commission's intent for the RER fund is to mitigate future FAC and Environmental Surcharges. With environmental compliance casts accelerating due to federal environmental requirements, explain why those concerns should not be even greater given KIUC's interpretation of the Commission's intent in Case No. 2007-00455.
- c. KIUC intends that this recommendation replace the method set out in Big River's current tariff for depletion of the RER or that the RER be depleted by both methods simultaneously (note that the tariff method would not begin until the Economic Reserve is depleted). If KIUC intends that both methods be used, state whether Mr. Baron believes that customers will experience rate shock when the RER is depleted.
- d. Mr. Baron states that, if the Commission adopts the KIUC proposal, the fund would be fully utilized by late 2016 or early 2017. Provide the calculations supporting this projection.

RESPONSE:

- a. The Commission order did not discuss the specific use of the RER fund. Rather, the order states that the RER is specifically to be used to "credit the bills rendered to the Rural Customers over a period 24 months commencing upon the depletion of all funds in the Economic Reserve." (order at Appendix A, paragraph 24). However, at page 11 of the Commission order, the Commission specifically states that the Economic Reserve account will be used "to offset future wholesale power cost increases for non-Smelter customers due to increases in fuel, environmental, and other costs. Since the RER

³ Case No. 2007-00455, The Applications of Big Rivers Electric Corporation for: (1) Approval of Wholesale Tariff Additions for Big Rivers Electric Corporation, (2) Approval of Transactions, (3) Approval to issue Evidences of Indebtedness, and (4) Approval of Amendments to Contracts; and of E.ON U.S., LLC, Western Kentucky Energy Corp., and LG&E Energy Marketing, Inc. for Approval of Transactions (Ky. PSC Mar. 6, 2009).

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)**

**KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST
PSC CASE NO. 2011-00036
June 22, 2011**

provides credits upon the depletion of the Economic Reserve account (which is to be used to offset fuel, environmental, and other cost increases), the RER would be expected to offset the same cost increases (fuel, environmental, and other cost increases).

- b. As discussed in response to Part (c) of this question, under the KIUC proposal the RER would be depleted about 12 months earlier than otherwise projected to occur by Big Rivers. KIUC believes that the current economic environment justifies the use of the RER beginning September 1, 2011 rather than imposing the full rate increase on Rural customers. The ultimate objective of the RER is to benefit Rural customers by reducing the otherwise applicable Big Rivers charges. The KIUC proposal accomplishes this objective by reducing known Rural rate increases.
- c. KIUC's proposal is that the RER would begin providing \$4.2 million annually to off-set the Rural rate increase in this case, beginning on September 1, 2011. When the Economic Reserve fund is depleted, the RER would also begin to off-set FAC and environmental compliance costs. As shown in the analysis in response to Part (d) of this question, based on Big Rivers' projections and adoption of the KIUC proposal to utilize the RER to partially off-set the Rural rate increase, the RER fund would be depleted in early 2017 (March), rather than Big Rivers' assumed depletion date in early 2018 (about 12 months difference). Mr. Baron does not know whether consumers will experience rate shock upon the depletion of the RER, whether or not the KIUC proposal is adopted. All else being equal, Rural rates would be higher without the RER credits – the determination of rate shock would be a function of the percentage change in rates as a result of the depletion of the RER credits.
- d. See attached analysis on enclosed CD.

Witness: Stephen J. Baron

Big Rivers Rural Economic Reserve Fund Analysis

<u>Month</u>	<u>Year</u>	<u>Beginning Balance</u>	<u>Interest Income</u>	<u>Forecasted Withdrawals</u>	<u>KIUC Mitigation</u>	<u>Ending Balance</u>	<u>BREC Implied Interest Rate</u>
Aug	2011	63,017,077	98,003			63,115,080	
Sep	2011	63,115,080	94,990			63,210,070	0.15050%
Oct	2011	63,210,070	98,306			63,308,376	0.15552%
Nov	2011	63,308,376	95,284			63,403,660	0.15051%
Dec	2011	63,403,660	98,610			63,502,270	0.15553%
Jan	2012	63,502,270	98,495			63,600,765	0.15510%
Feb	2012	63,600,765	92,285			63,693,050	0.14510%
Mar	2012	63,693,050	98,794			63,791,844	0.15511%
Apr	2012	63,791,844	95,757			63,887,601	0.15011%
May	2012	63,887,601	99,099			63,986,700	0.15511%
Jun	2012	63,986,700	96,052			64,082,752	0.15011%
Jul	2012	64,082,752	99,405			64,182,157	0.15512%
Aug	2012	64,182,157	99,560			64,281,717	0.15512%
Sep	2012	64,281,717	96,500			64,378,217	0.15012%
Oct	2012	64,378,217	99,868			64,478,085	0.15513%
Nov	2012	64,478,085	96,798			64,574,883	0.15013%
Dec	2012	64,574,883	100,176			64,675,059	0.15513%
Jan	2013	64,675,059	97,895			64,772,954	0.15137%
Feb	2013	64,772,954	98,044			64,870,998	0.15137%
Mar	2013	64,870,998	98,192			64,969,190	0.15137%
Apr	2013	64,969,190	98,341			65,067,531	0.15137%
May	2013	65,067,531	98,490			65,166,020	0.15137%
Jun	2013	65,166,020	98,639			65,264,659	0.15137%
Jul	2013	65,264,659	98,788			65,363,447	0.15137%
Aug	2013	65,363,447	98,937			65,462,384	0.15137%
Sep	2013	65,462,384	99,087			65,561,472	0.15137%
Oct	2013	65,561,472	99,237			65,660,709	0.15137%
Nov	2013	65,660,709	99,387			65,760,096	0.15137%
Dec	2013	65,760,096	99,538			65,859,634	0.15137%
Jan	2014	65,859,634	99,706			65,959,340	0.15139%
Feb	2014	65,959,340	99,857			66,059,198	0.15139%
Mar	2014	66,059,198	100,008			66,159,206	0.15139%
Apr	2014	66,159,206	100,160			66,259,366	0.15139%
May	2014	66,259,366	100,311			66,359,677	0.15139%
Jun	2014	66,359,677	100,463			66,460,141	0.15139%
Jul	2014	66,460,141	100,615			66,560,756	0.15139%
Aug	2014	66,560,756	100,768			66,661,524	0.15139%
Sep	2014	66,661,524	100,920			66,762,444	0.15139%
Oct	2014	66,762,444	101,073			66,863,517	0.15139%
Nov	2014	66,863,517	101,226			66,964,744	0.15139%
Dec	2014	66,964,744	101,379			67,066,123	0.15139%
Jan	2015	67,066,123	110,503	999,721		66,176,905	0.16477%
Feb	2015	66,176,905	109,038	999,721		65,286,223	0.16477%

Big Rivers Rural Economic Reserve Fund Analysis

<u>Month</u>	<u>Year</u>	<u>Beginning Balance</u>	<u>Interest Income</u>	<u>Forecasted Withdrawals</u>	<u>KIUC Mitigation</u>	<u>Ending Balance</u>	<u>BREC Implied Interest Rate</u>
Mar	2015	65,286,223	107,571	999,721		64,394,073	0.16477%
Apr	2015	64,394,073	106,101	999,721		63,500,452	0.16477%
May	2015	63,500,452	104,628	999,721		62,605,360	0.16477%
Jun	2015	62,605,360	103,154	999,721		61,708,792	0.16477%
Jul	2015	61,708,792	101,676	999,721		60,810,748	0.16477%
Aug	2015	60,810,748	100,197	999,721		59,911,223	0.16477%
Sep	2015	59,911,223	98,714	999,721		59,010,217	0.16477%
Oct	2015	59,010,217	97,230	999,721		58,107,726	0.16477%
Nov	2015	58,107,726	95,743	999,721		57,203,748	0.16477%
Dec	2015	57,203,748	94,253	999,721		56,298,280	0.16477%
Jan	2016	56,298,280	106,525	2,199,905		54,204,900	0.18921%
Feb	2016	54,204,900	102,564	2,199,905		52,107,559	0.18921%
Mar	2016	52,107,559	98,595	2,199,905		50,006,249	0.18921%
Apr	2016	50,006,249	94,619	2,199,905		47,900,963	0.18921%
May	2016	47,900,963	90,636	2,199,905		45,791,694	0.18921%
Jun	2016	45,791,694	86,645	2,199,905		43,678,434	0.18921%
Jul	2016	43,678,434	82,646	2,199,905		41,561,175	0.18921%
Aug	2016	41,561,175	78,640	2,199,905		39,439,910	0.18921%
Sep	2016	39,439,910	74,626	2,199,905		37,314,632	0.18921%
Oct	2016	37,314,632	70,605	2,199,905		35,185,332	0.18921%
Nov	2016	35,185,332	66,576	2,199,905		33,052,003	0.18921%
Dec	2016	33,052,003	62,539	2,199,905		30,914,637	0.18921%
Jan	2017	30,914,637	73,568	2,203,525		28,784,680	0.23797%
Feb	2017	28,784,680	68,500	2,203,525		26,649,654	0.23797%
Mar	2017	26,649,654	63,419	2,203,525		24,509,548	0.23797%
Apr	2017	24,509,548	58,326	2,203,525		22,364,348	0.23797%
May	2017	22,364,348	53,221	2,203,525		20,214,044	0.23797%
Jun	2017	20,214,044	48,104	2,203,525		18,058,623	0.23797%
Jul	2017	18,058,623	42,975	2,203,525		15,898,072	0.23797%
Aug	2017	15,898,072	37,833	2,203,525		13,732,380	0.23797%
Sep	2017	13,732,380	32,679	2,203,525		11,561,533	0.23797%
Oct	2017	11,561,533	27,513	2,203,525		9,385,521	0.23797%
Nov	2017	9,385,521	22,335	2,203,525		7,204,331	0.23797%
Dec	2017	7,204,331	17,144	2,203,525		5,017,950	0.23797%
Jan	2018	5,017,950	*				

* Per Balance shown on Big Rivers Response to KIUC 1 - 64.

KIUC Rural Economic Reserve Fund Analysis

<u>Month</u>	<u>Year</u>	<u>Beginning Balance</u>	<u>Interest Income</u>	<u>Forecasted Withdrawals</u>	<u>KIUC Mitigation</u>	<u>Ending Balance</u>	<u>BREC Implied Interest Rate</u>
Aug	2011	63,017,077	98,003			63,115,080	
Sep	2011	63,115,080	94,990		353,792	62,856,278	0.15050%
Oct	2011	62,856,278	97,756		353,792	62,600,241	0.15552%
Nov	2011	62,600,241	94,218		353,792	62,340,668	0.15051%
Dec	2011	62,340,668	96,957		353,792	62,083,832	0.15553%
Jan	2012	62,083,832	96,295		353,792	61,826,335	0.15510%
Feb	2012	61,826,335	89,710		353,792	61,562,253	0.14510%
Mar	2012	61,562,253	95,489		353,792	61,303,950	0.15511%
Apr	2012	61,303,950	92,022		353,792	61,042,180	0.15011%
May	2012	61,042,180	94,685		353,792	60,783,073	0.15511%
Jun	2012	60,783,073	91,243		353,792	60,520,524	0.15011%
Jul	2012	60,520,524	93,879		353,792	60,260,611	0.15512%
Aug	2012	60,260,611	93,477		353,792	60,000,296	0.15512%
Sep	2012	60,000,296	90,073		353,792	59,736,577	0.15012%
Oct	2012	59,736,577	92,668		353,792	59,475,452	0.15513%
Nov	2012	59,475,452	89,288		353,792	59,210,948	0.15013%
Dec	2012	59,210,948	91,855		353,792	58,949,010	0.15513%
Jan	2013	58,949,010	89,228		353,792	58,684,446	0.15137%
Feb	2013	58,684,446	88,828		353,792	58,419,482	0.15137%
Mar	2013	58,419,482	88,427		353,792	58,154,117	0.15137%
Apr	2013	58,154,117	88,025		353,792	57,888,350	0.15137%
May	2013	57,888,350	87,623		353,792	57,622,180	0.15137%
Jun	2013	57,622,180	87,220		353,792	57,355,608	0.15137%
Jul	2013	57,355,608	86,816		353,792	57,088,632	0.15137%
Aug	2013	57,088,632	86,412		353,792	56,821,252	0.15137%
Sep	2013	56,821,252	86,008		353,792	56,553,468	0.15137%
Oct	2013	56,553,468	85,602		353,792	56,285,278	0.15137%
Nov	2013	56,285,278	85,196		353,792	56,016,682	0.15137%
Dec	2013	56,016,682	84,790		353,792	55,747,679	0.15137%
Jan	2014	55,747,679	84,398		353,792	55,478,285	0.15139%
Feb	2014	55,478,285	83,990		353,792	55,208,483	0.15139%
Mar	2014	55,208,483	83,581		353,792	54,938,272	0.15139%
Apr	2014	54,938,272	83,172		353,792	54,667,652	0.15139%
May	2014	54,667,652	82,763		353,792	54,396,622	0.15139%
Jun	2014	54,396,622	82,352		353,792	54,125,182	0.15139%
Jul	2014	54,125,182	81,941		353,792	53,853,332	0.15139%
Aug	2014	53,853,332	81,530		353,792	53,581,069	0.15139%
Sep	2014	53,581,069	81,118		353,792	53,308,395	0.15139%
Oct	2014	53,308,395	80,705		353,792	53,035,307	0.15139%
Nov	2014	53,035,307	80,291		353,792	52,761,806	0.15139%
Dec	2014	52,761,806	79,877		353,792	52,487,891	0.15139%
Jan	2015	52,487,891	86,483	999,721	353,792	51,220,861	0.16477%
Feb	2015	51,220,861	84,396	999,721	353,792	49,951,744	0.16477%

KIUC Rural Economic Reserve Fund Analysis

<u>Month</u>	<u>Year</u>	<u>Beginning Balance</u>	<u>Interest Income</u>	<u>Forecasted Withdrawals</u>	<u>KIUC Mitigation</u>	<u>Ending Balance</u>	<u>BREC Implied Interest Rate</u>
Mar	2015	49,951,744	82,304	999,721	353,792	48,680,535	0.16477%
Apr	2015	48,680,535	80,210	999,721	353,792	47,407,232	0.16477%
May	2015	47,407,232	78,112	999,721	353,792	46,131,831	0.16477%
Jun	2015	46,131,831	76,010	999,721	353,792	44,854,328	0.16477%
Jul	2015	44,854,328	73,906	999,721	353,792	43,574,720	0.16477%
Aug	2015	43,574,720	71,797	999,721	353,792	42,293,005	0.16477%
Sep	2015	42,293,005	69,685	999,721	353,792	41,009,177	0.16477%
Oct	2015	41,009,177	67,570	999,721	353,792	39,723,234	0.16477%
Nov	2015	39,723,234	65,451	999,721	353,792	38,435,172	0.16477%
Dec	2015	38,435,172	63,329	999,721	353,792	37,144,987	0.16477%
Jan	2016	37,144,987	70,284	2,199,905	353,792	34,661,574	0.18921%
Feb	2016	34,661,574	65,585	2,199,905	353,792	32,173,462	0.18921%
Mar	2016	32,173,462	60,877	2,199,905	353,792	29,680,642	0.18921%
Apr	2016	29,680,642	56,160	2,199,905	353,792	27,183,105	0.18921%
May	2016	27,183,105	51,434	2,199,905	353,792	24,680,843	0.18921%
Jun	2016	24,680,843	46,700	2,199,905	353,792	22,173,846	0.18921%
Jul	2016	22,173,846	41,956	2,199,905	353,792	19,662,105	0.18921%
Aug	2016	19,662,105	37,204	2,199,905	353,792	17,145,611	0.18921%
Sep	2016	17,145,611	32,442	2,199,905	353,792	14,624,357	0.18921%
Oct	2016	14,624,357	27,671	2,199,905	353,792	12,098,331	0.18921%
Nov	2016	12,098,331	22,892	2,199,905	353,792	9,567,526	0.18921%
Dec	2016	9,567,526	18,103	2,199,905	353,792	7,031,932	0.18921%
Jan	2017	7,031,932	16,734	2,203,525	353,792	4,491,349	0.23797%
Feb	2017	4,491,349	10,688	2,203,525	353,792	1,944,720	0.23797%
Mar	2017	1,944,720	4,628	1,949,347	-	(0)	0.23797%

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)**

**KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST
PSC CASE NO. 2011-00036
June 22, 2011**

Request STAFF-22

Refer to pages 34-37 of the Baron Testimony regarding Big Rivers' proposal to include \$1 million in its revenue requirement for the cost of Demand-Side Management ("DSM") programs. Mr. Baron's testimony emphasizes the distinctions between Big Rivers' proposal to recover these costs through its base rates and recovery pursuant to an alternative cost recovery mechanism pursuant to KRS 278.285. Explain, from a cost of service and revenue allocation perspective, whether KIUC would be opposed to an allocation of revenues which recognizes that none of Big Rivers' DSM costs are for programs that serve the aluminum smelters and which assigns them none of those costs.

RESPONSE:

KIUC believes that it is appropriate to use an alternative cost recovery mechanism in this particular case because Big Rivers has not established a reasonable estimate (via a supportable budget) to justify the inclusion of \$1 million in its base rates. From a policy standpoint, it is not desirable, in Mr. Baron's opinion, to simply grant Big Rivers a \$1 million checking account for possible DSM expenditures. The alternative cost recovery mechanism provides Big Rivers with cost recovery and at the same time permits the Commission and parties of this case to evaluate the reasonableness of actual expenditures. Notwithstanding this position, it would certainly be appropriate to limit the cost of service allocation of DSM costs that are included in base rates to the rate classes that cause the costs. In this case, these classes would not include the Smelter class. Based on Mr. Baron's review of Big Rivers data responses in this case, most of the costs would be assignable to the Rural rate class, though there does not appear to be any quantifiable allocation of the \$1 million pro-forma expense between the Rural and Large Industrial rate classes.

Witness: Stephen J. Baron

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST

PSC CASE NO. 2011-00036

June 22, 2011

Request STAFF-23

Refer to the Baron Testimony at page 38. Mr. Baron proposes to expand the Rate LICX tariff to include existing large industrial customers that may want to expand their usage rather than be required to take power at market prices. Explain whether this proposal conflicts with the Morey Testimony wherein it is stated that Big Rivers' generation is frequently "out of the market." Include in the explanation whether Mr. Baron believes Big Rivers' standard cost-based tariffed rates are economically competitive with those rates of other utilities in the region.

RESPONSE:

Mr. Baron does not believe that the KIUC proposal conflicts with Dr. Morey's testimony. Dr. Morey developed an analysis of market prices and potential sales of Big Rivers' generation under a scenario wherein the Smelters are no longer served by Big Rivers. He did not compare projected Large Industrial rates to market prices. More significantly, the issue facing a potential Large Industrial customer that may increase load on the Big Rivers' system is the cost of power over the long term, the length of which may vary by customer. Potential Large Industrial expansion would normally consider the cost, and risk, of future electric prices over a longer period than three years. As such, the ability to purchase power under a cost-based tariff could be a significant factor in the overall economic evaluation made by such an expansion customer.

Mr. Baron has not performed a comparison of Big Rivers' cost-based Large Industrial rates to the rates of other utilities in the region.

Witness: Stephen J. Baron

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST
PSC CASE NO. 2011-00036
June 22, 2011

Request STAFF-24

Provide an electronic copy of Exhibits SJB-3, SJB-4, SJB-5, and SJB-6 with the formulas intact and unprotected.

RESPONSE:

See attached on enclosed CD.

Witness: Stephen J. Baron

Table 4
Subsidies Remaining at Proposed Rates

	Total System	Rurals	Large Industrials	Smelters
1 Rate Base - 6 CP	1,170,341,502	390,335,625	96,406,419	683,599,459
2 Net Utility Operating Margin	25,806,684	(9,711,995)	2,075,623	33,443,057
3 Return on Rate Base	2.21%	-2.49%	2.15%	4.89%
4 Subsidy at Present Rates	-	(18,319,114)	(50,193)	18,369,307
5 Adjusted Total Increase Required	18,679,000			
6 Eliminate Rural Subsidy	18,319,114	18,319,114		
7 Spread of Increase Remainder	359,886	98,395	34,009	227,482
Step 1 Increase - Rurals Subsidy	18,319,114	18,319,114	-	-
8 Net Increase	18,679,000	18,417,509	34,009	227,482
9 Income at Proposed Rates (line 2 + line 8)	44,485,684	8,705,513	2,109,631	33,670,539
10 ROR - Proposed Rates (line 9/line 1)	3.80%	2.23%	2.19%	4.93%
11 Net Utility Operating Margin at System ROR	44,485,684	14,836,992	3,664,491	25,984,202
12 Subsidy at Proposed Rates (line 11 - line 9)	-	6,131,478	1,554,859	(7,686,338)

Big Rivers Electric Corporation

Analysis of Rate Increase Scenario

6 CP Cost of Service using Seelye model with TIER Adjustment at \$1.95

Line		Total System	Rurals	Large Industrials	Smelters
1	Rate Base - 6 CP	1,170,341,502 \$	390,335,625 \$	96,406,419 \$	683,599,459
2	Net Utility Operating Margin	25,806,684 \$	(9,711,995) \$	2,075,623 \$	33,443,057
3	Return on Rate Base	2.21%	-2.49%	2.15%	4.89%
4	Subsidy at Present Rates	-	(18,319,114)	(50,193)	18,369,307
5	Adjusted Total Increase Required	18,679,000			

Table 3
KIUC Proposed Rate Increases

Line	Total System	Rurals	Large Industrials	Smelters
4	-	(18,319,114)	(50,193)	18,369,307
5	18,679,000			
6	18,319,114	18,319,114	-	-
16	359,886	98,395	34,009	227,482
17	<u>18,319,114</u>	<u>18,319,114</u>	<u>-</u>	<u>-</u>
19	<u>18,679,000</u>	<u>18,417,509</u>	<u>34,009</u>	<u>227,482</u>
20	(4,245,506)	<u>(4,245,506)</u>	<u>-</u>	<u>-</u>
21		14,172,003	34,009	227,482
22	(2,708,000)	<u>(621,285)</u>	<u>(235,635)</u>	<u>(1,851,080)</u>
23		13,550,718	(201,626)	(1,623,598)
25		12.26%	-0.51%	-0.57%

10,675,114,974	<u>2,449,147,804</u>	<u>928,887,170</u>	<u>7,297,080,000</u>
1	0.229425895	0.087014254	0.683559851

Big Rivers Electric Corporation

KIUC Proposed Rate Increases

6 CP Cost of Service using Seelye model with TIER Adjustment at test year level of \$1.95

Line	Total System	Rurals	Large Industrials	Smelters
1 Rate Base - 6 CP	1,170,341,502	390,335,625	96,406,419	683,599,459
2 Net Utility Operating Margin	25,806,684	(9,711,995)	2,075,623	33,443,057
3 Return on Rate Base	2.21%	-2.49%	2.15%	4.89%
4 Subsidy at Present Rates	-	(18,319,114)	(50,193)	18,369,307
5 KIUC Proposed Revenue Increase	18,679,000			
6 Eliminate Subsidy to Rurals	18,319,114	18,319,114	-	-
7 Remainder of Increase to be Allocated	359,886			
8 Demand/Energy Base Revenue - Current Rates	118,930,921	88,490,963	30,439,958	
9 Weather Normalization Adjustment	(421,610)	(421,610)	-	
10 Base Rate Revenue	322,119,734	88,069,353	30,439,958	203,610,423
11 Revenue Allocator using Smelter/Industrial Ratio	322,119,734	88,069,353	30,439,958	203,610,423
12 Percent Allocator	100.00%	27.34%	9.45%	63.21%
13 Spread of Increase Remainder	359,886	98,395	34,009	227,482
14 Step 1 Increase - Rurals Subsidy	18,319,114	18,319,114	-	-
15 Net Increase (before Rural Reserve or Capital Credits)	18,679,000	18,417,509	34,009	227,482
16 Rural Mitigation from Rural Economic Reserve Fund	(4,245,506)	(4,245,506)	-	-
17 Net Increase after Mitigation		14,172,003	34,009	227,482
18 Patronage Capital Distribution per kWh	(2,708,000)	(621,285)	(235,635)	(1,851,080)
19 Final Effective Base Rate Increase		13,550,718	(201,626)	(1,623,598)
20 Present Revenue	432,165,302	110,513,089	39,260,372	282,391,841
21 Percent Increase		12.26%	-0.51%	-0.57%
22 Amortization of Non-FAC PPA	(3,236,077)	(2,340,068)	(896,009)	-
23 Revenue Increase with Non-FAC PPA Amortization		11,210,650	(1,097,635)	(1,623,598)
24 Percent Increase		10.14%	-2.80%	-0.57%
25 Impact of Lowering the Non-FAC PPA Base	(2,959,158)	(2,145,453)	(813,705)	-
26 Adjusted Revenue Increase		9,065,197	(1,911,340)	(1,623,598)
27 Percent Increase		8.20%	-4.87%	-0.57%

Big Rivers Electric Corporation
 Cost of Service Study
 Development of A&E Factor

BR System Peak	1,510,692
BR System Energy	10,491,356,334
Average Demand	1,197,643
Annual Load Factor	79.3%

	RURAL	LARGE INDUSTRIAL	SMELTERS	TOTAL
Energy	2,449,147,804	928,887,170	7,113,321,360	10,491,356,334
Average Demand	279,583	106,037	812,023	1,197,643
Allocation Vector	0.233444	0.088538	0.678017	1.000000
Weighted Vector (LF)	0.185070	0.070191	0.537517	0.792778
Class NCP (60 minute) w/o Cogen	539,955	106,622	850,000	
Cogen	-	25,000	-	
Adjusted Class NCP	539,955	131,622	850,000	1,521,577
Excess Demand	260,372	25,584	37,977	323,933
Allocation Vector	0.803783	0.078980	0.117237	1.000000
Weighted Vector (1 - LF)	0.166561	0.016366	0.024294	0.207222
Total A&E Factor	0.351631	0.086558	0.561811	1.000000

EBMTRY	EBMTRM	EBMTRD	HR1	HR2	HR3	HR4	HR5	
20C	2009	11	1	208,022	205,501	209,381	215,337	224,555
20C	2009	11	2	208,024	209,332	212,315	218,772	234,204
20C	2009	11	3	181,117	180,884	182,793	187,934	202,043
20C	2009	11	4	227,349	223,105	220,989	222,352	232,527
20C	2009	11	5	196,482	198,457	201,310	208,139	224,888
20C	2009	11	6	226,695	227,232	228,083	234,048	248,389
20C	2009	11	7	186,152	180,983	178,889	181,865	189,966
20C	2009	11	8	154,843	151,568	151,523	154,002	159,866
20C	2009	11	9	149,368	146,142	145,872	148,033	158,465
20C	2009	11	10	152,699	152,224	152,053	153,755	165,959
20C	2009	11	11	165,687	163,771	165,636	170,790	184,622
20C	2009	11	12	209,969	210,850	213,453	219,137	234,114
20C	2009	11	13	216,217	218,137	221,785	228,054	242,364
20C	2009	11	14	197,415	195,440	195,556	201,259	211,937
20C	2009	11	15	171,038	166,363	163,453	162,549	165,383
20C	2009	11	16	148,258	144,510	143,170	146,149	157,053
20C	2009	11	17	159,377	155,793	154,775	159,739	171,070
20C	2009	11	18	209,556	206,163	206,388	208,998	221,283
20C	2009	11	19	209,853	207,432	205,960	208,861	220,352
20C	2009	11	20	221,471	220,575	222,465	229,195	242,953
20C	2009	11	21	205,836	203,397	204,713	208,972	218,116
20C	2009	11	22	192,217	189,930	190,914	193,930	201,264
20C	2009	11	23	193,008	191,564	192,090	195,460	206,933
20C	2009	11	24	181,743	176,687	175,506	178,503	187,470
20C	2009	11	25	194,649	193,284	195,712	202,350	215,576
20C	2009	11	26	220,377	218,162	220,137	227,366	238,605
20C	2009	11	27	254,803	255,116	257,712	264,363	273,496
20C	2009	11	28	252,534	248,281	247,425	249,630	254,758
20C	2009	11	29	189,953	186,101	186,032	189,132	194,840
20C	2009	11	30	187,659	187,597	191,091	197,885	212,446
20C	2009	12	1	277,029	274,179	276,219	280,028	291,160
20C	2009	12	2	245,441	242,256	240,077	241,490	249,475
20C	2009	12	3	251,473	247,307	247,450	250,492	261,170
20C	2009	12	4	293,908	295,703	299,509	306,117	318,791
20C	2009	12	5	316,207	315,707	315,381	320,355	329,724
20C	2009	12	6	333,777	332,250	332,688	334,700	338,217
20C	2009	12	7	275,591	270,721	270,831	274,615	286,363
20C	2009	12	8	256,965	254,380	255,645	260,650	270,600
20C	2009	12	9	207,444	204,731	207,926	215,722	232,367
20C	2009	12	10	353,983	351,747	353,388	359,590	372,744
20C	2009	12	11	365,104	362,309	362,640	368,129	380,587
20C	2009	12	12	337,081	332,131	329,868	331,033	336,984

20C	2009	12	13	253,702	243,592	238,594	235,393	235,495
20C	2009	12	14	215,446	210,579	208,964	210,855	221,905
20C	2009	12	15	220,945	222,586	227,973	237,796	257,189
20C	2009	12	16	346,777	347,723	351,187	358,255	373,337
20C	2009	12	17	333,416	332,048	333,248	338,965	353,105
20C	2009	12	18	286,405	281,685	278,963	281,156	291,378
20C	2009	12	19	251,198	246,623	246,855	248,759	255,647
20C	2009	12	20	306,331	299,384	296,004	296,102	300,205
20C	2009	12	21	302,565	299,043	298,737	301,941	312,874
20C	2009	12	22	288,154	284,063	282,546	286,538	296,403
20C	2009	12	23	224,491	218,336	215,063	217,057	226,322
20C	2009	12	24	217,951	210,851	207,805	209,695	215,733
20C	2009	12	25	205,819	196,239	192,825	195,282	201,913
20C	2009	12	26	311,863	307,745	306,807	309,100	316,642
20C	2009	12	27	286,070	281,031	279,937	281,824	289,212
20C	2009	12	28	341,114	338,172	338,315	343,321	355,155
20C	2009	12	29	325,083	322,485	322,523	326,445	336,470
20C	2009	12	30	303,546	299,981	297,536	298,575	305,622
20C	2009	12	31	258,003	250,795	246,675	246,706	251,756
201	2010	1	1	333,463	338,215	342,936	348,279	356,926
201	2010	1	2	388,210	388,859	391,457	394,954	401,665
201	2010	1	3	409,414	408,830	409,673	413,781	420,993
201	2010	1	4	403,750	404,739	408,367	416,566	433,504
201	2010	1	5	413,085	415,555	419,977	428,361	443,249
201	2010	1	6	409,289	409,779	412,548	417,912	431,553
201	2010	1	7	344,198	341,852	342,413	346,715	357,456
201	2010	1	8	436,599	436,874	440,292	445,520	457,556
201	2010	1	9	418,661	417,046	417,318	418,944	423,237
201	2010	1	10	440,923	442,468	445,330	448,784	455,968
201	2010	1	11	397,508	394,226	393,276	393,247	401,982
201	2010	1	12	369,954	370,277	372,520	376,557	386,777
201	2010	1	13	370,493	374,134	378,948	386,081	399,840
201	2010	1	14	325,497	326,367	329,057	335,653	347,432
201	2010	1	15	244,765	240,921	240,502	243,888	254,515
201	2010	1	16	249,911	247,565	249,228	252,219	259,251
201	2010	1	17	227,569	223,816	221,934	224,546	229,122
201	2010	1	18	283,109	286,114	288,973	295,334	306,049
201	2010	1	19	266,041	266,750	267,334	270,984	282,380
201	2010	1	20	210,503	207,910	208,171	212,218	223,862
201	2010	1	21	204,591	202,197	202,050	206,623	217,928
201	2010	1	22	218,574	218,056	219,366	226,450	238,247
201	2010	1	23	237,131	230,859	227,017	227,032	228,853
201	2010	1	24	217,748	210,517	206,356	206,079	207,675
201	2010	1	25	232,754	235,246	240,483	247,802	264,007
201	2010	1	26	296,546	295,444	295,475	298,391	311,053
201	2010	1	27	348,284	347,493	349,623	353,987	364,816
201	2010	1	28	267,791	263,834	265,096	274,240	291,897

201	2010	1	29	350,856	352,681	353,973	360,352	373,203
201	2010	1	30	389,623	385,564	383,872	388,396	393,128
201	2010	1	31	392,332	397,983	404,753	413,330	422,231
201	2010	2	1	360,200	363,853	370,386	377,653	391,350
201	2010	2	2	289,069	287,584	287,813	292,839	305,757
201	2010	2	3	276,551	274,215	273,639	277,822	291,886
201	2010	2	4	301,523	300,182	300,391	304,361	316,889
201	2010	2	5	267,409	265,082	263,941	265,736	276,091
201	2010	2	6	291,747	291,107	293,445	298,553	307,205
201	2010	2	7	330,071	330,493	334,803	340,843	350,821
201	2010	2	8	336,202	337,664	340,502	343,434	352,215
201	2010	2	9	308,375	305,366	304,498	306,115	315,003
201	2010	2	10	398,924	395,622	391,678	388,991	393,305
201	2010	2	11	351,356	352,570	355,293	363,731	378,712
201	2010	2	12	357,585	362,320	368,172	376,732	392,668
201	2010	2	13	312,122	308,704	309,403	312,292	318,844
201	2010	2	14	321,058	318,333	318,208	319,728	323,201
201	2010	2	15	331,320	337,955	345,081	353,913	370,165
201	2010	2	16	359,269	356,533	358,274	361,394	370,367
201	2010	2	17	341,236	342,391	345,813	353,527	368,582
201	2010	2	18	323,830	325,766	330,029	340,042	356,217
201	2010	2	19	325,322	327,652	333,119	341,419	356,826
201	2010	2	20	272,169	265,261	263,512	265,406	271,331
201	2010	2	21	226,089	222,459	222,467	223,599	228,840
201	2010	2	22	192,570	191,407	192,311	196,563	208,156
201	2010	2	23	273,230	269,554	271,838	275,494	288,146
201	2010	2	24	300,943	300,660	300,933	307,663	323,396
201	2010	2	25	339,434	340,542	343,066	349,395	361,902
201	2010	2	26	329,474	329,033	333,676	341,008	355,019
201	2010	2	27	314,051	311,479	313,171	317,422	326,447
201	2010	2	28	277,805	276,494	277,778	280,727	287,596
201	2010	3	1	259,413	260,348	263,277	270,459	282,875
201	2010	3	2	268,618	267,463	266,362	272,550	286,145
201	2010	3	3	300,332	297,158	296,117	298,788	308,759
201	2010	3	4	291,036	288,877	292,835	301,861	318,468
201	2010	3	5	291,979	292,605	297,529	306,385	322,983
201	2010	3	6	282,800	282,221	285,781	292,996	303,280
201	2010	3	7	266,665	269,163	272,610	275,990	280,583
201	2010	3	8	187,143	187,700	191,169	198,001	215,355
201	2010	3	9	206,245	202,560	204,759	210,723	224,129
201	2010	3	10	175,349	166,740	163,672	164,621	175,274
201	2010	3	11	152,103	145,491	144,946	148,288	158,141
201	2010	3	12	166,781	162,172	162,856	167,860	181,727
201	2010	3	13	208,105	201,916	199,767	202,259	207,709
201	2010	3	14	215,319	211,597	-	208,951	210,254
201	2010	3	15	216,777	213,178	212,011	214,992	226,095
201	2010	3	16	216,689	209,910	206,975	208,729	218,749

201	2010	3	17	205,003	198,259	197,358	202,263	213,965
201	2010	3	18	201,437	198,730	202,235	209,566	225,252
201	2010	3	19	184,248	183,542	186,792	195,608	211,405
201	2010	3	20	172,771	167,947	168,867	173,475	183,073
201	2010	3	21	162,521	158,219	156,110	157,095	160,796
201	2010	3	22	192,796	195,004	201,854	209,888	223,481
201	2010	3	23	223,941	222,451	222,886	228,746	240,330
201	2010	3	24	186,484	187,696	188,225	195,137	210,269
201	2010	3	25	161,205	158,911	155,317	156,317	165,762
201	2010	3	26	224,190	226,182	228,161	235,405	247,289
201	2010	3	27	233,085	233,288	235,083	237,272	244,291
201	2010	3	28	164,170	159,488	158,045	158,849	162,766
201	2010	3	29	199,683	201,464	205,972	213,070	227,353
201	2010	3	30	201,435	206,131	205,792	214,036	228,950
201	2010	3	31	168,197	168,685	170,928	177,576	190,760
201	2010	4	1	147,626	142,107	136,028	137,421	145,000
201	2010	4	2	151,585	143,601	135,381	132,654	137,284
201	2010	4	3	151,022	141,685	132,845	129,596	130,703
201	2010	4	4	149,621	142,363	139,379	139,059	145,962
201	2010	4	5	143,260	136,635	132,170	131,726	138,033
201	2010	4	6	165,676	154,173	144,970	141,985	145,496
201	2010	4	7	163,147	154,685	145,700	142,702	147,495
201	2010	4	8	147,239	141,178	136,098	133,501	139,599
201	2010	4	9	178,190	177,668	174,594	177,865	189,750
201	2010	4	10	172,357	171,259	167,930	170,059	177,190
201	2010	4	11	150,586	146,009	145,271	146,811	151,986
201	2010	4	12	141,085	134,882	132,352	135,076	145,109
201	2010	4	13	149,457	142,992	135,883	135,555	142,924
201	2010	4	14	155,063	147,036	137,044	135,058	141,474
201	2010	4	15	158,752	149,022	139,707	137,368	142,303
201	2010	4	16	158,156	149,971	140,720	138,017	143,087
201	2010	4	17	151,733	142,151	134,238	132,454	135,992
201	2010	4	18	157,107	149,382	147,576	149,599	157,262
201	2010	4	19	151,271	149,085	149,884	153,682	165,591
201	2010	4	20	152,633	148,308	143,689	144,457	154,011
201	2010	4	21	150,575	146,285	141,921	145,274	156,210
201	2010	4	22	146,004	143,071	139,059	141,428	149,965
201	2010	4	23	149,473	142,562	135,799	135,733	141,843
201	2010	4	24	161,818	152,938	142,018	138,305	138,858
201	2010	4	25	146,884	137,916	132,929	130,549	131,818
201	2010	4	26	146,908	141,444	139,795	140,986	150,353
201	2010	4	27	160,096	155,411	151,295	153,077	162,566
201	2010	4	28	178,015	176,252	173,856	179,213	190,670
201	2010	4	29	155,027	152,140	148,410	151,751	162,493
201	2010	4	30	153,120	145,401	137,871	135,709	142,656
201	2010	5	1	178,467	163,155	151,039	143,580	142,139
201	2010	5	2	154,004	144,707	139,535	137,080	136,621

201	2010	5	3	152,221	142,735	137,081	134,997	140,880
201	2010	5	4	158,158	148,623	139,228	137,350	142,699
201	2010	5	5	159,915	149,637	141,406	139,715	145,908
201	2010	5	6	179,178	166,890	154,463	148,213	150,411
201	2010	5	7	166,941	156,145	146,750	143,878	149,350
201	2010	5	8	161,380	147,818	137,201	133,464	134,848
201	2010	5	9	158,073	152,633	149,960	150,656	153,867
201	2010	5	10	149,442	146,367	145,415	147,883	158,049
201	2010	5	11	157,978	154,035	148,094	148,111	155,331
201	2010	5	12	161,735	151,807	143,885	143,450	150,138
201	2010	5	13	177,655	165,218	156,862	155,318	161,612
201	2010	5	14	195,144	181,054	169,128	163,989	166,245
201	2010	5	15	165,288	153,213	143,488	140,204	140,200
201	2010	5	16	159,882	147,351	139,994	136,181	135,138
201	2010	5	17	148,243	140,692	136,801	135,969	142,313
201	2010	5	18	152,249	143,389	137,343	135,981	141,816
201	2010	5	19	150,992	144,426	137,962	137,456	144,521
201	2010	5	20	151,528	145,177	138,191	138,178	145,721
201	2010	5	21	151,949	146,114	140,428	139,344	145,051
201	2010	5	22	163,535	150,355	140,482	136,447	137,047
201	2010	5	23	179,446	164,511	155,064	148,836	146,034
201	2010	5	24	219,804	200,582	187,482	180,006	180,675
201	2010	5	25	203,109	186,072	171,962	165,923	169,277
201	2010	5	26	202,235	186,014	171,153	164,882	167,245
201	2010	5	27	205,304	188,373	173,209	166,095	168,034
201	2010	5	28	183,810	167,754	159,286	156,117	159,223
201	2010	5	29	200,906	182,452	167,968	159,974	157,571
201	2010	5	30	212,623	192,369	179,000	170,120	165,210
201	2010	5	31	210,336	191,201	177,684	169,122	166,346
201	2010	6	1	190,367	174,985	164,598	160,282	163,441
201	2010	6	2	231,208	212,220	197,690	190,514	192,701
201	2010	6	3	187,837	176,536	168,970	165,649	169,641
201	2010	6	4	218,389	197,898	182,532	175,388	175,512
201	2010	6	5	246,086	228,828	212,996	202,560	198,310
201	2010	6	6	251,764	231,920	218,857	210,326	207,232
201	2010	6	7	176,467	163,976	155,267	152,446	155,102
201	2010	6	8	191,471	177,435	165,859	161,732	162,838
201	2010	6	9	217,369	204,531	196,435	191,911	194,569
201	2010	6	10	234,870	218,514	202,724	193,630	192,049
201	2010	6	11	253,530	232,343	215,095	208,396	206,999
201	2010	6	12	248,132	230,965	217,582	211,479	210,093
201	2010	6	13	282,127	258,494	240,023	225,502	215,248
201	2010	6	14	279,952	257,900	240,868	232,027	230,106
201	2010	6	15	240,074	220,766	204,302	196,907	197,883
201	2010	6	16	235,082	218,692	204,941	198,145	198,592
201	2010	6	17	238,078	219,356	201,588	193,682	194,485
201	2010	6	18	224,652	208,351	193,085	186,281	186,658

201	2010	6	19	294,477	267,479	247,594	237,039	230,834
201	2010	6	20	240,765	216,110	199,126	187,138	181,433
201	2010	6	21	285,137	261,147	241,978	230,060	225,369
201	2010	6	22	287,478	263,520	242,961	231,432	227,732
201	2010	6	23	298,362	275,221	256,217	245,395	243,090
201	2010	6	24	291,708	271,812	254,971	245,024	244,766
201	2010	6	25	237,133	216,722	199,512	191,607	190,083
201	2010	6	26	251,112	227,415	213,716	201,473	196,700
201	2010	6	27	301,647	276,001	256,381	242,139	234,445
201	2010	6	28	291,343	258,214	236,060	223,892	220,430
201	2010	6	29	226,556	206,961	193,867	186,925	187,012
201	2010	6	30	213,129	197,153	181,921	172,987	171,977
201	2010	7	1	189,465	173,731	161,795	156,791	159,128
201	2010	7	2	187,113	172,379	160,179	154,271	155,708
201	2010	7	3	195,514	177,698	163,359	155,445	153,825
201	2010	7	4	261,807	238,012	221,395	210,555	202,463
201	2010	7	5	248,826	223,633	205,606	194,185	188,817
201	2010	7	6	230,503	210,471	195,594	188,336	188,018
201	2010	7	7	265,955	243,623	223,157	211,694	209,803
201	2010	7	8	283,521	259,085	239,190	228,136	226,798
201	2010	7	9	278,617	257,722	240,558	230,210	228,895
201	2010	7	10	239,693	219,803	201,338	191,177	187,038
201	2010	7	11	229,021	203,554	188,016	177,339	171,826
201	2010	7	12	228,346	209,485	196,887	189,507	191,492
201	2010	7	13	250,725	233,653	220,374	214,768	215,752
201	2010	7	14	249,915	228,189	211,367	202,022	200,785
201	2010	7	15	287,255	262,394	242,291	229,958	227,550
201	2010	7	16	299,145	280,695	260,898	247,862	242,333
201	2010	7	17	286,090	262,570	240,936	227,120	221,185
201	2010	7	18	284,827	259,722	242,706	231,632	226,164
201	2010	7	19	240,024	227,033	219,048	214,373	214,753
201	2010	7	20	237,637	222,373	213,275	207,099	210,018
201	2010	7	21	282,835	267,028	253,214	245,350	245,298
201	2010	7	22	248,878	231,989	221,148	214,635	217,050
201	2010	7	23	307,081	282,310	263,449	250,315	246,790
201	2010	7	24	298,829	274,362	254,519	241,456	230,240
201	2010	7	25	307,836	284,592	268,994	257,013	249,582
201	2010	7	26	280,639	259,337	243,321	233,437	231,830
201	2010	7	27	276,699	259,894	247,239	238,171	236,988
201	2010	7	28	273,689	252,315	235,092	226,152	226,371
201	2010	7	29	270,564	255,799	242,528	236,285	235,740
201	2010	7	30	274,297	249,085	231,103	218,694	215,563
201	2010	7	31	256,192	235,838	221,131	213,511	208,445
201	2010	8	1	284,065	261,682	244,298	230,230	220,722
201	2010	8	2	232,100	213,061	199,810	191,929	192,111
201	2010	8	3	258,611	235,822	221,399	212,701	213,305
201	2010	8	4	336,841	312,611	293,295	279,825	276,469

201	2010	8	5	341,393	317,625	297,595	285,393	282,149
201	2010	8	6	260,946	240,044	228,261	219,346	219,607
201	2010	8	7	233,422	212,694	197,704	188,166	183,715
201	2010	8	8	228,139	207,017	192,284	181,750	176,801
201	2010	8	9	262,747	240,578	225,938	216,651	216,120
201	2010	8	10	312,188	290,390	275,177	263,772	262,354
201	2010	8	11	323,467	300,795	285,225	273,787	271,474
201	2010	8	12	321,393	298,370	281,515	270,516	268,044
201	2010	8	13	251,848	234,397	223,513	220,730	221,062
201	2010	8	14	312,996	288,233	268,823	256,478	248,576
201	2010	8	15	267,542	249,631	236,183	227,681	223,785
201	2010	8	16	280,300	258,039	240,138	226,199	222,423
201	2010	8	17	212,296	196,223	189,286	182,009	184,285
201	2010	8	18	239,200	225,093	214,836	211,536	213,721
201	2010	8	19	241,994	222,225	211,438	203,903	206,922
201	2010	8	20	248,988	228,158	214,087	205,739	204,410
201	2010	8	21	271,192	254,560	245,501	239,732	239,459
201	2010	8	22	255,096	233,816	217,528	207,908	202,746
201	2010	8	23	239,479	219,275	205,514	197,199	197,503
201	2010	8	24	218,551	201,693	191,686	185,432	188,595
201	2010	8	25	222,021	203,921	192,238	185,851	189,807
201	2010	8	26	198,516	179,932	171,563	167,496	170,063
201	2010	8	27	185,595	172,297	164,296	160,813	164,700
201	2010	8	28	192,518	178,296	168,391	162,645	162,664
201	2010	8	29	254,534	234,944	221,121	210,258	203,364
201	2010	8	30	227,766	214,908	205,797	200,989	206,122
201	2010	8	31	224,725	207,923	194,454	187,512	189,653
201	2010	9	1	231,514	213,114	201,780	193,193	197,095
201	2010	9	2	234,451	218,042	205,451	200,462	200,404
201	2010	9	3	230,454	217,772	210,622	207,213	209,167
201	2010	9	4	178,413	165,678	158,086	154,591	155,166
201	2010	9	5	159,055	148,662	143,604	141,394	140,853
201	2010	9	6	167,283	155,316	147,519	144,271	145,057
201	2010	9	7	192,648	179,330	171,593	168,186	173,564
201	2010	9	8	226,622	211,231	199,589	192,429	192,653
201	2010	9	9	182,991	172,600	164,640	163,522	168,623
201	2010	9	10	173,862	166,514	161,228	158,410	163,534
201	2010	9	11	174,210	165,427	162,798	160,165	164,001
201	2010	9	12	180,705	166,649	156,553	150,421	148,010
201	2010	9	13	161,174	151,490	145,986	144,184	151,277
201	2010	9	14	182,095	168,735	162,671	158,416	165,025
201	2010	9	15	185,864	175,677	168,212	165,245	168,879
201	2010	9	16	229,850	218,690	210,759	207,190	208,089
201	2010	9	17	189,018	174,382	167,016	161,520	165,238
201	2010	9	18	175,055	163,147	155,963	151,291	151,731
201	2010	9	19	184,428	169,796	160,165	154,808	152,818
201	2010	9	20	182,888	169,543	161,380	158,142	162,878

201	2010	9	21	216,744	202,445	192,546	185,078	185,965
201	2010	9	22	228,026	210,451	199,078	190,478	190,240
201	2010	9	23	216,702	202,725	189,692	183,095	185,906
201	2010	9	24	234,976	220,434	209,641	202,787	205,381
201	2010	9	25	192,520	175,910	164,296	156,712	155,207
201	2010	9	26	163,363	153,527	146,235	142,287	141,309
201	2010	9	27	142,985	137,602	134,941	135,347	142,476
201	2010	9	28	152,218	146,929	143,960	144,111	151,192
201	2010	9	29	151,715	146,458	144,173	143,801	151,727
201	2010	9	30	148,355	142,419	139,860	139,213	146,708
201	2010	10	1	157,780	150,141	144,590	143,768	149,500
201	2010	10	2	151,489	145,017	143,910	142,778	145,257
201	2010	10	3	153,707	147,706	145,202	144,434	146,394
201	2010	10	4	163,574	161,969	163,316	167,446	177,052
201	2010	10	5	174,705	172,634	172,228	175,077	186,008
201	2010	10	6	167,012	164,951	167,043	171,448	184,065
201	2010	10	7	153,973	149,102	146,424	148,393	155,292
201	2010	10	8	153,938	146,782	142,253	142,080	149,288
201	2010	10	9	154,144	147,402	143,049	141,958	145,614
201	2010	10	10	149,851	140,574	135,335	132,917	134,685
201	2010	10	11	149,487	141,037	136,187	135,273	141,192
201	2010	10	12	162,529	154,701	149,776	148,721	152,609
201	2010	10	13	152,079	143,204	138,986	137,837	143,626
201	2010	10	14	150,047	144,752	140,775	141,811	150,707
201	2010	10	15	157,246	153,003	150,068	151,017	159,490
201	2010	10	16	165,135	162,150	161,537	162,900	168,055
201	2010	10	17	152,300	147,646	144,635	144,606	148,653
201	2010	10	18	140,761	134,524	131,590	132,505	141,046
201	2010	10	19	150,514	144,625	139,804	140,014	148,298
201	2010	10	20	153,780	148,048	148,251	151,759	162,737
201	2010	10	21	150,560	146,230	145,544	148,730	158,467
201	2010	10	22	163,745	162,312	163,314	168,218	180,506
201	2010	10	23	155,059	149,435	146,277	145,700	150,652
201	2010	10	24	145,914	137,834	132,827	130,767	131,575
201	2010	10	25	143,702	137,433	132,699	133,027	139,879
201	2010	10	26	158,065	151,914	151,448	153,761	161,142
201	2010	10	27	153,630	150,093	148,871	150,598	161,397
201	2010	10	28	149,646	143,238	140,550	143,567	151,420
201	2010	10	29	189,926	189,071	190,476	197,239	210,472
201	2010	10	30	214,657	212,481	213,182	217,035	224,793
201	2010	10	31	170,345	166,665	166,400	168,623	173,662

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HR6	HR7	HR8	HR9	HR10	HR11	HR12	HR13	HR14
239,078	252,083	260,572	255,349	238,491	220,265	210,762	207,163	203,624
267,885	292,964	276,365	254,080	239,685	229,326	219,557	214,274	210,654
235,097	263,609	255,955	240,459	229,843	222,831	215,703	209,911	206,576
262,748	289,903	274,563	258,949	241,847	227,320	216,715	210,671	205,326
259,942	291,282	271,307	252,199	238,396	227,062	216,593	210,608	206,215
279,440	303,935	279,169	254,261	235,968	223,847	213,839	207,698	203,673
203,141	213,967	219,095	218,599	216,390	212,311	206,477	202,517	199,024
171,419	182,453	199,443	209,238	206,031	197,492	195,342	198,726	198,346
189,146	221,470	218,095	210,583	206,501	207,635	207,095	205,681	204,244
197,049	231,023	224,843	219,869	215,268	212,482	206,772	206,244	205,585
217,481	251,320	240,694	229,111	223,472	217,915	211,619	207,063	204,665
270,461	300,851	279,005	255,006	238,055	227,081	217,730	211,337	207,154
275,527	302,785	287,268	264,429	246,237	230,616	216,667	207,161	203,481
225,352	237,984	240,303	234,391	224,951	215,954	207,782	201,080	197,193
170,439	179,801	194,658	211,101	210,239	200,606	198,059	199,691	197,470
186,119	215,795	214,199	211,774	210,733	209,945	207,779	206,099	204,984
202,042	238,522	233,551	231,571	231,968	232,280	229,700	228,721	230,316
250,573	282,763	271,008	262,875	256,056	254,525	250,294	249,009	249,034
250,391	279,856	269,326	264,361	256,333	245,734	236,251	224,677	218,367
275,157	304,022	287,551	261,516	242,276	227,707	213,922	207,411	203,275
233,467	248,135	254,561	247,669	236,171	224,025	215,124	206,989	201,631
212,670	227,445	244,649	259,563	248,376	227,932	215,858	209,684	204,598
237,115	269,947	262,168	254,080	250,273	246,561	242,289	238,909	236,782
215,949	248,931	243,566	239,618	237,083	232,456	223,042	215,706	213,681
239,933	263,013	268,763	264,357	256,184	248,637	238,439	229,988	226,397
255,190	271,507	287,629	306,134	318,658	321,739	305,109	277,423	261,952
289,607	304,510	305,654	299,670	287,475	270,329	255,854	242,077	232,186
266,025	276,439	280,267	272,813	261,876	247,491	232,030	216,281	205,484
205,558	216,867	228,966	245,525	246,362	235,781	231,429	232,597	231,664
246,279	285,466	284,057	282,901	284,405	279,210	272,112	264,123	252,552
324,291	356,319	337,351	308,514	283,736	264,327	246,377	236,678	227,243
277,425	309,920	300,361	294,774	294,330	292,281	285,468	279,929	276,375
293,790	330,127	323,049	316,815	313,355	310,032	304,057	299,151	295,582
350,850	387,196	372,408	343,918	320,606	301,106	282,652	271,754	268,537
347,951	368,035	374,297	360,565	339,819	318,665	300,228	284,003	271,674
349,654	365,000	376,449	377,390	362,197	336,613	321,890	313,819	307,830
316,440	351,595	341,264	331,995	324,679	314,709	303,671	296,488	292,092
301,173	338,914	327,376	319,777	320,019	319,315	315,735	315,075	313,784
268,242	310,623	309,322	310,203	322,561	332,593	331,949	335,365	336,811
403,537	441,047	428,597	408,615	394,555	380,622	365,374	353,736	343,022
410,879	441,496	425,571	405,559	386,828	352,282	319,422	300,401	288,726
349,398	363,869	367,566	364,853	355,309	343,047	328,936	315,800	310,361

241,308	253,063	268,223	286,668	287,480	276,714	273,004	271,973	266,456
250,666	283,893	274,218	265,814	261,009	250,389	238,121	230,378	228,228
296,197	339,749	336,963	338,552	342,126	341,114	334,498	328,625	329,402
406,550	441,602	422,173	390,747	366,942	342,388	319,144	301,360	289,500
385,016	419,509	401,027	373,586	346,283	323,596	301,912	284,871	273,187
319,180	354,140	341,897	330,552	321,228	305,502	288,872	273,874	261,145
270,925	289,788	307,154	326,433	337,990	340,860	339,294	338,017	337,809
309,094	324,249	342,564	362,824	363,011	349,698	343,532	343,496	342,562
334,484	355,704	357,843	362,313	363,366	358,936	349,523	341,703	335,426
319,048	341,560	349,085	351,263	341,793	316,186	288,080	269,936	257,290
248,650	272,335	282,221	288,178	292,346	288,947	276,423	263,744	256,581
229,239	249,168	265,883	283,646	296,768	296,159	283,417	270,722	265,015
215,847	238,768	263,395	294,564	318,380	334,725	342,156	338,021	332,498
328,633	341,474	345,067	343,597	339,498	337,884	329,172	313,159	300,562
301,770	317,961	331,344	342,964	346,019	340,381	345,992	350,721	346,393
375,056	395,311	399,077	402,831	406,133	407,244	402,944	396,787	387,695
358,977	382,757	387,664	375,144	356,333	340,498	322,425	308,319	301,435
324,545	343,473	347,547	350,154	352,720	348,574	339,319	329,240	322,931
265,365	282,822	291,466	298,979	307,158	311,543	309,461	307,963	306,452
369,556	383,576	387,076	387,774	385,812	380,548	369,301	354,889	341,255
415,579	431,612	442,512	444,798	432,906	414,547	395,809	380,395	366,796
432,694	448,832	459,349	465,547	451,280	420,937	394,842	379,326	368,068
466,129	496,244	491,105	471,737	449,958	429,838	409,889	391,624	379,365
477,034	511,386	499,174	477,049	456,443	434,176	411,282	394,151	377,806
463,042	499,061	486,447	458,123	433,588	411,584	386,289	364,550	342,339
380,151	398,980	401,296	404,526	413,778	421,670	424,380	420,312	420,402
477,489	499,106	502,390	503,463	497,923	490,975	479,020	468,341	463,579
433,310	447,581	458,163	468,477	468,507	454,003	434,473	412,846	397,928
468,206	484,160	495,892	492,192	464,069	426,371	399,015	381,739	365,780
425,642	452,890	448,102	433,202	413,560	387,192	372,664	362,906	362,450
415,793	445,646	432,301	415,876	398,193	376,369	351,637	327,896	316,297
432,533	466,975	451,987	412,679	380,011	353,482	326,028	304,049	289,571
378,870	414,001	397,850	371,141	343,054	316,124	289,979	271,129	258,140
281,968	316,526	308,468	299,020	294,160	286,972	274,724	257,841	243,701
271,359	286,751	298,685	310,182	304,830	292,312	276,215	261,598	253,506
239,689	254,393	273,383	293,616	298,407	288,396	279,496	272,893	261,012
325,224	346,799	352,359	356,544	359,654	357,215	342,058	325,091	309,239
310,020	343,340	329,391	313,394	293,056	273,752	253,189	237,846	228,448
253,676	287,826	284,773	275,641	275,072	273,423	266,776	261,277	257,729
247,389	284,381	282,414	273,389	273,034	274,131	270,535	266,527	263,944
269,996	306,377	301,990	298,200	298,599	299,572	295,466	288,769	283,703
238,000	251,882	262,097	275,344	281,562	277,235	266,314	251,945	241,735
212,806	222,866	235,872	252,347	254,897	247,087	242,866	242,594	239,314
298,554	337,326	331,667	327,801	328,930	331,270	331,199	333,024	335,314
343,004	379,586	374,906	369,244	367,720	369,871	362,876	353,637	350,488
394,578	425,457	409,943	385,838	367,719	346,165	318,130	297,226	293,651
326,510	366,365	362,595	349,858	340,486	331,955	318,690	306,813	302,470

401,572	434,200	434,333	434,653	435,401	431,829	427,217	420,159	414,251
402,256	409,952	413,520	420,591	424,182	419,550	403,026	385,931	374,591
434,291	449,009	456,178	441,957	406,326	368,614	342,017	322,765	305,544
421,548	453,772	446,232	405,340	367,018	340,396	315,773	294,774	281,121
338,512	374,948	364,295	343,169	319,139	298,858	288,864	286,134	284,929
328,781	366,445	359,181	333,443	310,052	293,180	278,413	265,888	257,384
348,098	382,387	370,960	360,728	352,945	342,874	327,425	314,370	304,785
306,934	341,809	334,538	327,047	324,035	320,115	314,172	308,179	303,805
321,217	339,930	357,057	378,013	389,363	390,380	383,770	377,261	372,769
363,835	378,038	391,516	384,232	361,801	336,906	321,013	312,707	305,336
380,180	412,591	402,919	389,443	373,205	360,626	349,640	338,950	334,915
335,932	353,689	353,596	358,969	361,049	365,901	365,763	363,591	364,126
410,057	427,205	424,105	421,903	413,942	401,059	385,331	371,460	359,510
408,868	437,743	428,466	395,904	363,839	341,762	322,194	306,802	295,104
425,934	454,033	447,552	413,769	373,487	341,940	316,539	297,509	286,608
333,472	348,253	361,867	371,489	372,140	361,593	350,717	338,542	328,650
330,989	341,319	354,881	365,400	361,332	349,904	342,131	338,430	332,352
394,239	415,964	424,085	429,897	433,141	426,951	415,762	402,515	394,984
391,802	413,644	411,046	401,307	392,142	380,622	372,142	366,416	363,301
398,165	425,142	416,664	400,499	382,676	362,412	342,107	328,373	321,120
389,817	424,165	400,097	359,582	332,069	311,584	292,976	276,974	266,515
390,958	423,829	400,684	358,151	322,624	295,866	272,365	254,413	240,886
282,828	295,735	304,522	301,920	292,185	275,554	253,509	236,271	224,656
238,455	249,484	264,956	271,416	259,517	240,326	223,107	214,502	208,107
240,747	278,817	276,873	276,480	282,737	290,233	292,547	294,106	297,608
320,970	357,379	352,245	346,607	341,599	339,507	330,092	318,870	312,518
360,151	396,337	389,610	383,942	375,836	365,497	355,388	350,020	347,746
394,557	428,461	415,196	396,611	379,321	360,673	340,780	323,546	310,226
388,936	418,373	395,334	362,463	339,648	321,658	302,862	287,830	276,499
339,643	352,278	360,874	361,945	348,480	330,054	310,757	295,313	286,704
295,872	307,480	323,099	333,840	325,092	302,165	286,304	279,003	268,111
314,032	346,107	337,150	324,718	317,451	309,404	300,482	295,205	292,982
320,846	356,627	349,509	341,804	334,777	324,197	310,531	297,147	288,825
339,169	367,530	357,525	341,863	327,105	314,831	305,653	299,077	294,692
354,802	381,753	355,514	324,001	300,685	283,000	264,376	250,186	239,940
358,236	383,859	354,746	315,774	286,876	265,211	247,542	233,951	223,505
319,997	331,091	324,775	307,280	284,351	263,559	243,051	226,544	214,689
290,138	298,211	309,272	300,897	276,375	249,615	231,000	217,926	206,060
251,970	284,169	274,275	259,645	252,200	243,476	232,937	221,989	209,993
256,805	281,975	268,317	251,302	242,559	235,048	226,465	221,265	217,124
205,721	231,153	222,531	211,658	204,697	200,661	196,413	194,328	192,870
188,917	223,146	221,476	217,620	213,619	209,907	203,940	201,676	197,844
215,116	247,678	248,080	246,588	249,609	250,113	246,078	241,236	234,880
220,096	230,852	248,851	259,284	261,953	260,520	259,272	251,952	248,346
214,082	223,978	238,514	256,757	263,017	261,027	262,845	263,808	260,485
254,624	292,558	286,418	277,100	273,802	269,261	263,104	261,136	256,575
247,181	284,305	276,806	268,260	264,216	257,476	244,004	231,730	223,041

244,806	281,492	275,510	266,339	263,455	260,591	252,904	244,183	235,271
260,332	299,266	288,333	261,471	239,881	224,942	212,587	204,948	197,041
247,708	288,964	278,100	251,370	231,368	217,424	206,330	198,980	193,316
198,411	217,453	232,984	234,122	226,521	216,953	204,768	195,843	190,826
169,102	182,440	199,583	223,324	230,587	223,780	225,309	230,291	231,523
257,770	296,440	295,063	291,333	290,610	287,980	278,200	270,362	262,052
271,848	307,525	298,030	283,751	270,286	253,789	234,143	218,845	208,935
245,159	282,688	270,469	244,371	226,348	212,803	201,930	196,497	194,334
194,241	231,925	228,371	224,971	227,978	229,812	228,370	227,957	226,787
279,580	317,822	308,554	289,223	277,150	263,548	246,251	231,225	219,961
258,875	277,219	286,673	281,782	266,461	248,196	229,393	214,573	203,613
171,342	187,159	205,437	227,452	235,166	227,780	225,312	227,155	227,223
259,612	294,959	285,116	265,012	251,802	242,196	231,268	221,345	212,474
262,311	298,438	286,007	256,234	232,729	216,502	205,382	200,273	194,940
220,080	254,078	243,736	224,119	211,092	204,441	197,375	195,473	193,517
169,553	202,978	200,597	196,524	195,605	196,871	196,740	199,521	202,182
155,883	182,635	189,172	191,837	194,812	198,907	198,386	200,532	203,813
138,404	151,079	168,664	192,163	207,543	211,633	207,468	200,885	195,513
157,964	170,916	194,359	211,502	206,442	191,073	185,269	184,852	180,270
158,317	176,121	183,792	196,880	209,952	220,828	228,912	236,575	242,479
164,713	179,503	187,623	197,826	209,480	220,554	225,568	231,740	238,703
167,815	183,094	188,704	198,227	205,000	209,526	209,158	207,563	206,852
159,528	180,730	188,615	196,665	204,121	207,763	205,425	199,478	195,653
217,668	239,011	235,631	221,076	211,225	208,236	201,028	195,316	190,880
191,033	203,613	212,827	213,118	208,825	202,227	195,413	191,196	188,872
161,970	171,252	186,773	197,531	195,537	187,629	186,978	191,797	195,559
175,570	205,865	203,636	195,879	195,766	201,262	204,791	210,245	215,944
170,835	200,615	199,588	194,881	197,107	203,455	211,060	223,821	234,788
168,556	196,388	195,306	193,937	199,968	210,433	221,918	237,517	251,642
167,997	194,747	195,157	198,027	207,805	221,462	234,579	249,293	259,570
166,963	192,266	195,713	199,460	209,215	221,436	231,899	241,021	250,928
143,433	149,094	167,616	184,140	192,296	194,937	192,884	191,126	189,155
167,663	178,666	198,838	210,586	205,042	192,362	187,058	186,385	184,303
198,416	227,824	222,921	210,726	203,492	200,127	197,637	196,656	196,104
181,888	208,903	205,678	198,615	194,387	195,369	194,592	195,520	198,373
187,085	216,428	212,844	204,080	198,875	198,010	197,139	198,656	200,745
177,846	204,108	203,145	196,594	195,954	198,293	201,358	205,935	210,631
165,931	192,936	194,737	194,864	200,489	208,529	214,201	223,601	233,958
144,549	151,071	167,623	190,888	208,229	218,635	219,620	219,072	215,264
136,188	138,527	162,005	187,132	194,328	191,303	191,358	194,542	193,987
177,857	207,499	210,358	209,537	213,509	217,579	215,899	210,730	208,501
190,703	220,316	221,180	218,111	221,753	223,917	223,503	219,155	213,786
221,722	246,965	235,338	218,340	208,995	203,765	198,321	197,687	196,670
191,406	218,676	211,807	202,858	201,194	200,192	198,512	200,840	201,720
165,583	189,363	195,063	197,670	201,636	207,550	209,781	216,455	223,782
145,931	156,670	169,966	191,957	209,260	219,453	220,984	219,931	215,923
140,557	145,724	161,210	188,852	207,714	213,621	218,603	223,870	226,012

163,442	188,406	197,536	203,487	215,886	229,388	238,197	246,771	255,208
164,427	189,761	194,042	197,809	207,373	219,682	229,517	240,328	251,266
167,630	193,581	200,199	206,907	221,224	238,502	252,065	266,757	280,308
169,005	194,278	201,699	205,874	212,651	222,834	231,230	241,379	252,456
171,410	198,882	211,078	223,457	241,605	259,942	272,578	284,273	298,019
139,449	148,780	169,349	184,996	193,174	194,430	190,353	186,881	184,462
160,692	170,855	190,016	207,355	206,774	192,716	184,044	181,007	175,697
185,423	213,355	212,305	206,224	207,371	209,094	207,133	204,894	201,422
179,187	201,430	200,126	197,943	200,196	204,664	205,340	207,736	209,627
175,676	205,137	212,126	211,795	218,837	226,381	232,540	244,470	255,905
183,874	212,331	229,365	243,860	255,435	268,260	279,853	287,714	297,646
186,162	213,431	221,569	225,612	234,756	244,231	251,520	257,142	265,895
143,410	150,397	171,452	190,529	204,851	217,310	226,753	235,512	243,065
137,962	140,295	160,484	185,975	199,466	199,476	203,341	209,566	211,211
164,902	190,642	198,686	202,912	210,520	218,291	223,169	227,859	231,261
158,609	173,798	185,349	192,319	199,225	206,835	206,851	207,938	209,126
165,418	190,749	194,799	193,572	196,844	201,983	203,487	205,665	208,211
165,756	191,490	195,890	196,746	200,919	204,020	204,139	201,964	201,271
166,024	192,134	199,632	203,504	208,442	213,785	217,625	223,668	229,143
139,265	151,140	176,305	199,599	220,592	239,232	250,306	262,215	275,842
142,988	150,634	183,579	226,244	262,358	290,862	318,990	345,391	363,554
196,646	226,251	247,028	268,636	293,754	320,321	345,630	370,344	384,368
185,464	213,767	231,226	249,564	273,546	301,032	325,249	349,596	367,933
184,212	210,640	231,826	256,378	287,670	318,191	341,501	362,206	378,049
183,787	211,306	232,883	257,533	287,379	320,004	348,688	369,450	371,254
175,561	198,893	216,522	239,028	264,290	293,189	317,556	339,712	357,366
157,119	166,616	197,757	236,896	275,031	306,957	330,638	349,028	364,552
160,747	171,655	209,241	257,437	294,256	317,528	337,322	356,416	370,757
166,739	171,546	197,831	236,787	269,289	293,615	311,784	327,136	338,844
176,486	200,703	225,348	247,020	272,503	306,592	335,355	364,044	384,789
205,471	224,964	244,750	260,122	282,179	314,102	345,545	375,526	387,721
182,388	200,177	221,980	247,517	281,049	313,335	340,379	364,445	383,640
185,174	206,574	233,549	262,605	296,120	324,953	353,146	376,312	394,861
196,911	208,727	243,190	283,932	321,557	350,866	372,357	385,320	397,864
206,667	215,213	242,939	270,308	284,869	295,544	301,220	309,302	319,024
164,398	183,671	207,618	232,872	260,744	290,428	313,549	334,813	351,184
172,491	192,414	216,412	239,624	266,854	297,465	321,113	344,284	362,622
210,454	222,640	242,097	260,674	272,666	284,474	298,020	313,898	331,257
199,989	218,927	244,381	274,704	307,112	337,477	360,258	383,223	401,424
217,209	238,061	261,502	284,235	302,792	320,979	337,542	354,451	373,334
210,147	222,210	254,391	296,876	338,860	375,180	402,376	419,930	433,320
204,213	215,049	256,386	304,289	344,694	374,238	401,520	425,173	441,800
237,431	258,670	300,274	340,122	377,544	413,391	434,823	442,755	441,787
206,557	230,332	268,991	305,050	345,280	386,832	418,615	441,947	458,529
206,059	227,936	259,736	290,547	326,239	356,670	379,801	397,011	411,065
203,773	223,143	243,556	261,555	282,991	310,381	337,931	365,287	364,901
196,153	217,555	251,520	286,697	327,329	368,493	401,404	430,139	452,943

221,797	214,162	226,475	245,947	275,863	316,840	351,109	380,589	403,662
174,700	186,250	225,927	277,996	325,314	362,558	396,297	424,537	442,353
229,615	251,122	289,293	326,941	370,802	411,867	442,896	466,132	483,142
234,282	251,709	285,289	320,965	358,568	395,718	428,908	454,496	471,279
248,980	270,828	306,865	341,565	378,683	412,376	436,387	453,648	467,233
253,076	271,691	304,486	339,882	372,043	397,523	406,155	408,323	417,220
196,662	215,446	247,056	279,522	314,036	347,922	375,462	397,982	419,922
194,756	205,547	241,816	287,160	332,708	374,590	410,809	437,774	458,268
227,544	234,258	266,641	307,336	344,611	368,968	396,744	426,896	445,592
226,715	242,471	268,365	293,396	320,587	350,678	364,353	373,218	390,582
194,037	215,064	248,074	277,772	311,199	342,013	364,459	381,175	394,440
179,901	195,979	219,682	242,051	265,616	288,990	305,940	323,294	334,708
167,117	183,494	207,013	225,167	247,599	269,243	286,581	303,564	319,842
162,633	177,465	200,136	220,262	242,952	264,631	282,590	300,271	318,978
151,677	160,161	185,734	222,216	268,653	314,032	353,952	383,277	404,546
194,898	201,044	240,458	293,701	336,553	366,054	390,438	412,935	427,487
185,790	192,659	225,820	272,807	321,456	364,751	391,414	408,371	420,973
194,796	213,167	248,436	285,102	329,283	372,785	406,223	431,683	451,197
214,448	230,947	264,217	305,372	348,399	392,978	427,147	448,334	464,112
231,998	248,400	284,203	322,778	366,200	408,961	437,800	458,966	473,932
239,221	250,138	267,078	284,344	302,763	325,111	340,491	350,394	357,308
184,921	192,873	227,799	270,861	313,393	351,352	378,320	397,896	410,975
166,187	172,304	207,343	255,762	300,243	334,669	367,148	395,110	412,406
203,192	222,275	247,606	277,416	303,524	322,475	340,236	362,815	381,336
228,145	239,373	251,193	260,348	274,182	292,349	314,992	345,292	370,969
209,191	227,484	262,725	301,373	343,797	384,614	415,868	439,723	458,284
235,206	249,199	282,336	322,409	368,275	414,480	445,494	468,352	485,831
247,689	258,004	283,823	314,945	353,275	391,473	421,351	445,223	462,680
219,953	225,054	252,326	286,671	318,605	350,098	379,586	406,030	429,222
221,529	226,138	261,778	301,916	329,869	351,912	377,742	403,443	403,903
225,024	241,372	270,741	300,530	335,929	373,172	405,065	432,171	451,505
220,405	234,062	251,810	275,981	316,008	350,010	381,255	409,001	419,692
254,183	262,811	283,478	307,771	344,561	382,711	397,823	394,195	386,757
224,634	241,073	275,180	312,996	358,901	404,872	437,612	458,646	475,474
250,660	263,489	297,978	335,729	375,540	415,892	445,437	468,596	484,971
227,167	232,523	269,721	320,401	370,801	413,442	445,198	467,512	484,225
245,830	246,085	275,038	320,836	357,474	381,522	405,510	429,788	449,869
240,526	254,684	280,162	302,639	328,501	359,163	385,279	409,025	418,256
244,350	253,638	279,743	307,280	336,434	361,641	380,397	397,263	412,435
236,942	253,124	281,455	313,533	351,991	392,146	424,043	444,196	447,776
245,329	261,399	290,115	320,936	361,242	407,326	439,328	460,694	475,915
220,126	232,045	256,655	285,062	319,010	350,696	377,056	399,294	418,111
208,894	210,262	236,123	270,957	307,945	344,183	380,682	411,186	435,761
216,241	215,592	238,636	269,934	296,120	315,263	338,018	362,239	384,645
204,507	219,516	245,972	280,673	322,228	366,528	400,158	427,055	448,700
223,577	238,906	269,782	303,507	342,892	391,307	434,231	467,624	493,478
284,688	295,855	325,724	368,870	416,911	461,446	493,520	518,595	532,924

292,976	309,426	327,067	344,507	358,853	374,248	393,025	416,672	439,531
230,221	244,714	264,660	286,327	317,123	347,649	375,578	400,348	420,568
181,278	181,655	206,288	243,470	283,467	321,169	352,776	376,609	397,131
175,243	174,479	206,432	255,241	301,823	340,553	376,652	412,024	438,321
232,945	252,382	271,647	298,608	339,815	391,769	433,382	463,685	481,215
273,850	290,161	310,017	346,171	392,937	438,704	469,316	487,296	499,848
286,361	305,623	321,864	355,587	399,428	441,862	469,098	487,965	504,684
282,045	301,086	320,500	357,134	405,057	452,863	486,199	508,250	519,735
237,828	260,975	279,564	310,305	349,496	393,520	431,148	463,612	487,716
248,952	252,540	283,061	322,653	364,283	403,534	439,460	470,010	485,209
224,643	226,091	248,123	284,821	316,912	351,425	389,463	424,296	451,370
238,440	257,437	267,145	286,289	308,595	329,962	349,553	368,731	387,996
203,079	225,175	236,934	257,339	284,505	315,967	344,353	372,348	397,906
231,596	254,876	264,039	280,700	311,114	345,041	375,140	402,208	425,557
225,948	250,938	257,897	273,830	302,161	342,304	379,712	413,471	436,364
220,606	244,975	258,676	285,935	323,133	364,109	397,877	427,612	450,317
241,945	246,503	253,492	271,876	290,522	308,613	335,127	368,829	396,038
202,601	202,873	236,064	288,769	332,591	363,245	390,663	416,050	435,292
217,014	239,215	252,970	275,342	303,957	337,234	363,616	382,530	400,003
205,529	230,434	242,132	261,274	289,996	320,537	346,345	366,177	379,891
209,186	234,097	238,662	250,915	271,063	298,177	321,645	347,403	371,610
188,498	209,317	213,778	227,583	246,218	268,908	290,888	311,471	330,406
181,846	203,597	209,003	221,053	240,346	264,786	286,341	308,075	332,174
166,312	169,610	190,699	222,381	260,083	304,241	348,816	385,548	415,766
202,015	200,313	230,138	280,077	321,207	350,696	378,319	399,503	408,554
229,009	261,188	263,490	271,877	292,826	319,812	345,408	370,655	389,430
211,499	238,068	241,768	256,601	287,314	325,694	354,433	377,325	399,682
219,293	245,017	255,842	273,902	306,104	339,398	363,571	384,085	402,405
218,124	242,620	256,521	275,899	306,051	342,102	362,303	376,542	391,918
232,466	259,396	262,883	264,298	270,410	284,122	305,201	316,702	327,172
159,610	162,401	178,305	199,126	216,144	225,027	234,140	242,858	253,791
144,540	146,471	163,435	186,194	199,594	206,684	218,866	234,207	250,292
150,638	152,368	167,035	194,891	225,798	256,310	284,209	308,038	330,984
199,204	230,048	240,985	264,122	299,074	342,505	379,755	408,448	429,816
211,005	236,434	232,204	240,459	259,596	279,119	296,060	312,341	327,621
190,102	217,043	215,259	219,712	230,562	241,113	247,415	253,579	260,544
185,424	217,746	213,163	211,853	217,440	221,016	221,013	218,760	220,893
171,900	181,462	199,165	228,984	262,463	290,007	298,280	299,457	300,945
149,872	151,023	170,267	201,960	224,916	240,918	258,896	279,067	294,745
174,495	199,841	201,330	209,497	226,025	248,855	272,362	299,048	325,646
186,096	214,119	214,308	223,034	243,555	271,234	296,079	324,786	343,874
192,178	220,064	219,235	231,957	255,280	289,928	320,496	351,018	374,674
228,589	255,749	249,780	255,592	271,592	288,422	293,832	309,170	335,531
186,183	213,333	212,235	220,207	235,933	253,748	267,319	287,291	307,817
157,576	164,247	179,765	199,013	220,983	246,451	270,732	296,489	324,250
154,693	156,340	173,612	205,086	229,044	251,375	282,301	313,685	335,955
183,926	214,108	215,981	230,368	259,068	293,415	326,665	360,807	388,366

208,287	235,613	236,496	254,184	285,625	324,334	360,405	395,654	425,029
216,124	244,757	243,438	262,779	296,707	335,675	367,452	392,556	411,810
208,975	239,619	238,405	257,707	290,180	331,553	366,373	396,079	418,702
226,047	255,784	258,001	278,390	309,915	344,387	374,406	381,864	375,827
159,565	166,061	176,700	197,469	215,881	234,938	249,676	264,213	280,667
144,559	151,335	163,870	185,786	193,958	192,228	195,050	199,326	200,821
167,445	196,393	192,497	194,622	200,438	206,756	209,945	215,445	221,259
173,717	204,725	198,962	196,779	198,997	202,351	203,723	208,406	214,490
176,718	206,555	199,036	195,894	198,678	203,927	208,410	214,161	223,321
171,699	203,129	195,088	194,488	198,355	207,637	216,203	227,532	241,697
172,028	199,208	194,731	195,699	200,064	205,522	207,023	210,300	217,460
155,858	169,099	179,406	189,558	192,656	195,089	194,187	193,317	190,402
153,726	165,399	181,858	202,283	204,175	196,360	192,439	192,583	190,705
203,983	236,767	235,692	229,176	222,014	215,659	207,785	201,903	200,255
212,698	245,162	240,718	225,974	215,932	207,747	203,453	200,165	199,364
208,722	235,721	230,083	219,681	210,734	205,909	201,120	201,375	202,030
178,079	204,952	203,164	198,326	200,815	205,170	209,979	216,718	225,427
172,447	200,065	199,757	198,788	200,735	207,551	213,686	221,749	233,268
155,542	165,757	175,216	186,959	193,311	200,022	208,295	219,756	233,408
140,032	148,714	160,541	181,070	189,999	196,319	211,650	233,544	253,154
162,214	187,252	188,498	195,562	205,094	218,945	233,969	255,067	273,720
173,702	197,699	195,737	196,876	205,142	218,877	229,482	238,579	242,280
164,693	190,006	188,493	192,111	198,208	204,168	207,066	211,801	214,482
174,589	200,893	199,882	195,693	196,150	196,839	196,226	197,909	199,611
182,918	208,248	204,111	200,464	198,946	198,333	195,906	196,461	197,062
179,807	195,049	206,306	211,253	207,135	200,127	194,054	190,975	190,086
156,353	168,671	181,875	197,323	195,793	188,783	190,035	196,168	202,972
167,281	201,905	197,264	194,753	196,878	204,253	212,281	222,745	233,689
173,218	208,018	199,808	195,343	195,918	196,913	194,593	195,255	195,238
192,344	233,692	224,231	212,326	203,010	199,250	196,819	196,413	197,795
187,132	222,300	213,126	203,022	199,361	198,487	197,458	196,710	196,864
211,348	250,973	241,194	226,770	214,423	205,705	199,078	196,347	195,855
160,579	173,963	182,307	191,891	198,343	198,674	196,669	194,945	195,173
136,532	147,667	158,701	180,574	190,367	191,750	198,521	205,247	209,324
166,000	200,603	200,082	195,401	199,263	204,238	206,830	212,039	213,495
189,684	228,367	228,308	218,518	209,753	206,309	202,049	200,084	198,313
189,004	226,435	218,499	206,593	201,252	200,139	197,820	198,599	201,495
180,820	218,865	213,588	205,878	203,265	202,264	197,551	194,117	192,431
245,401	286,894	278,179	261,398	244,872	234,183	219,003	207,924	200,541
238,634	257,232	269,077	269,174	257,351	240,224	222,788	208,059	199,486
183,546	199,830	215,291	225,288	215,028	198,752	192,416	192,929	191,740

HR15	HR16	HR17	HR18	HR19	HR20	HR21	HR22	HR23
200,014	201,867	217,999	254,124	262,081	257,582	255,332	241,769	224,863
208,094	208,947	220,364	255,716	264,336	259,418	247,177	227,763	203,690
202,704	206,036	223,124	267,988	281,740	286,028	283,342	268,926	248,122
202,991	205,658	222,136	260,115	266,798	264,253	255,851	240,373	216,487
202,824	206,821	224,736	266,077	280,582	282,448	281,625	266,652	246,499
200,899	200,831	213,976	246,480	247,792	244,891	239,807	228,707	212,536
198,398	201,045	209,039	233,857	230,849	221,723	213,192	198,566	182,238
198,092	201,296	213,765	244,857	244,740	235,835	222,365	201,654	177,897
201,892	204,188	222,388	251,977	252,125	244,864	231,267	208,768	182,475
202,004	204,391	216,968	252,139	256,894	251,193	239,854	218,841	192,233
201,849	207,249	226,849	266,942	273,678	270,541	267,083	252,577	233,456
203,074	207,487	228,624	266,429	274,318	277,677	272,955	255,874	235,381
198,649	198,005	215,130	247,672	250,023	248,082	245,678	234,691	219,415
194,663	197,546	213,728	238,754	238,060	231,893	224,606	211,027	195,795
194,544	197,816	214,562	244,773	244,536	237,844	224,961	203,826	179,081
205,262	213,255	235,659	259,576	258,122	252,459	239,923	218,148	189,486
231,597	241,007	266,519	294,599	295,834	293,916	285,942	266,259	238,884
248,561	256,720	283,978	304,631	303,934	299,038	288,006	266,372	239,392
211,419	214,857	238,177	277,650	285,748	288,390	283,449	266,456	243,240
197,513	199,791	217,860	246,575	248,558	247,792	245,316	237,616	225,213
198,595	197,650	210,710	237,105	238,437	238,114	235,085	225,691	212,533
201,299	207,100	230,938	261,155	265,501	264,450	256,940	240,628	218,056
234,395	240,513	261,911	283,596	283,995	277,778	266,085	244,295	215,601
212,180	218,868	245,152	268,146	269,649	265,391	257,821	242,008	222,006
226,054	232,583	254,986	280,575	282,072	279,849	273,648	262,398	244,783
256,941	258,468	269,182	285,128	290,210	292,361	292,851	286,345	273,263
224,509	227,433	255,771	294,008	300,041	302,252	299,582	291,119	276,433
200,434	201,346	218,960	248,505	249,096	247,714	243,427	232,634	216,568
230,815	237,167	261,341	279,376	276,469	270,839	256,077	235,971	212,957
247,573	253,635	288,560	334,629	346,271	351,017	348,223	331,655	305,324
224,173	236,043	274,789	318,013	328,763	332,121	325,380	305,593	278,304
273,410	281,512	307,909	328,629	329,636	331,168	327,990	310,537	284,151
293,649	306,964	338,072	363,564	369,704	372,822	367,918	348,589	323,038
274,562	293,663	332,433	369,229	374,519	377,044	374,857	362,692	345,512
269,626	278,450	319,099	360,354	368,481	373,980	375,831	369,658	356,344
304,824	314,162	344,550	372,201	373,822	372,665	363,472	345,227	314,468
288,969	292,708	320,574	351,282	355,070	354,046	344,870	323,226	292,523
311,448	322,523	343,612	353,227	347,199	333,068	315,639	287,699	251,130
337,784	353,389	388,455	418,108	423,717	426,294	425,399	413,702	388,878
338,726	349,661	394,070	437,554	444,100	445,434	442,894	426,576	397,874
282,044	288,545	333,843	381,142	389,541	394,271	393,085	384,943	367,132
310,154	316,236	338,787	354,857	348,821	340,104	330,570	315,589	293,110

260,434	263,522	289,487	316,777	318,099	317,579	307,615	287,180	256,472
226,698	235,110	267,979	297,604	299,458	298,166	291,005	274,904	247,910
334,533	344,173	376,031	414,331	423,357	424,797	419,807	403,317	375,763
282,042	291,852	339,181	392,625	405,931	413,032	411,616	395,562	366,677
274,999	286,964	320,642	357,954	368,662	372,195	370,366	352,840	324,688
258,087	267,961	298,753	327,972	328,830	325,828	320,413	308,771	287,416
340,901	349,099	371,200	383,733	380,991	377,864	372,279	359,969	339,840
344,209	349,676	370,017	386,029	383,314	382,223	375,564	360,602	334,973
330,877	334,693	356,695	384,880	384,072	381,159	373,078	355,186	327,151
251,925	256,773	284,309	314,488	317,227	314,704	306,022	290,394	265,088
251,966	255,297	279,458	303,655	301,110	296,749	291,126	280,015	257,919
260,718	259,717	271,739	278,906	271,314	266,251	262,064	256,360	241,931
335,586	338,090	351,816	366,801	366,746	366,292	363,089	355,485	341,380
293,906	298,786	326,414	360,562	362,947	360,754	354,153	340,440	320,058
347,133	352,958	375,579	399,031	403,806	405,403	401,849	391,279	370,005
377,522	372,126	389,024	415,896	413,984	406,532	396,680	380,081	357,006
305,271	314,026	343,253	383,426	387,768	387,413	380,752	362,417	337,379
320,071	319,922	336,929	356,146	353,209	345,010	335,364	318,027	293,177
309,159	316,330	338,930	356,783	345,813	337,506	333,186	332,674	330,964
335,336	342,227	377,958	415,827	417,700	417,248	415,874	411,438	401,938
357,531	359,725	389,641	437,512	443,142	446,744	445,598	437,511	423,900
371,453	387,047	420,440	459,355	466,237	468,033	460,773	445,818	423,254
372,691	381,230	420,465	468,841	479,264	479,693	473,127	453,793	431,718
371,226	378,582	414,847	461,175	474,480	477,160	472,357	455,132	431,030
330,475	335,760	374,376	420,849	429,649	430,650	423,084	403,543	376,223
422,076	432,189	462,815	506,873	510,451	505,052	494,324	477,889	456,446
458,296	460,218	476,028	499,996	494,834	485,017	472,498	455,911	438,262
392,267	396,449	422,120	465,733	473,012	474,357	472,502	463,908	452,451
354,726	360,535	392,579	445,483	460,555	466,692	462,858	447,798	424,621
364,329	370,553	390,013	422,224	425,851	425,468	423,012	414,457	392,274
313,340	322,821	353,772	399,008	413,788	418,127	415,968	407,924	387,586
281,379	283,884	312,581	367,254	382,990	387,853	386,924	372,413	348,469
252,736	261,683	289,165	327,000	335,085	332,896	323,315	302,293	276,199
239,346	243,885	261,136	291,654	296,140	293,618	292,007	285,153	272,189
254,425	259,863	272,876	295,623	293,927	288,124	281,928	270,566	255,481
250,611	248,252	262,169	303,081	313,389	315,787	314,953	309,674	297,101
297,269	290,791	305,999	344,281	352,921	348,903	339,143	318,817	291,932
224,794	229,850	250,841	285,205	293,051	290,170	284,229	266,358	239,994
256,000	262,180	280,114	301,819	301,114	292,988	283,645	263,746	237,177
260,951	259,034	267,510	293,009	302,474	301,260	294,459	275,389	250,741
280,573	284,260	296,457	317,084	314,336	306,740	298,579	284,537	266,582
238,031	237,543	247,852	274,867	278,557	274,897	269,266	259,405	244,814
234,871	235,278	247,737	277,373	283,545	285,032	278,680	267,513	250,721
339,700	346,616	362,840	389,504	393,897	388,335	376,016	354,618	326,952
349,164	353,655	363,579	399,037	414,582	413,973	408,369	394,113	372,278
300,797	309,819	331,157	358,152	361,688	359,378	353,861	333,795	303,226
296,829	303,969	341,431	386,666	404,693	409,965	407,374	393,457	372,004

412,269	418,238	431,564	456,179	457,361	450,814	444,315	431,145	412,977
359,366	348,588	360,540	401,634	420,563	419,174	415,307	411,109	398,628
294,193	294,144	316,485	370,082	395,875	401,853	398,821	389,447	372,608
272,663	277,499	303,312	348,302	366,781	366,934	359,304	342,172	315,741
289,661	300,235	322,419	352,083	359,919	356,989	351,424	329,939	304,357
252,610	256,903	283,326	335,634	359,442	366,124	365,901	351,166	326,398
299,662	305,220	319,439	346,502	355,866	355,133	345,306	324,245	297,675
301,180	304,709	314,465	335,998	340,061	337,997	335,286	327,548	312,897
370,575	371,351	377,240	394,899	396,213	388,737	378,616	366,992	350,449
299,911	300,786	317,914	356,037	373,286	382,409	381,444	379,825	358,352
337,439	343,686	357,940	387,030	397,032	394,174	383,360	363,343	336,707
365,920	382,699	412,917	453,080	470,321	466,730	462,821	449,166	426,565
352,894	355,661	367,500	399,252	419,564	416,830	408,378	391,768	368,667
286,340	288,185	309,933	359,072	390,166	398,999	398,708	387,915	370,016
279,904	283,562	305,935	342,938	363,724	365,164	362,831	353,419	338,565
322,913	327,369	336,895	357,036	368,012	365,809	359,729	352,893	341,185
331,726	335,197	344,741	364,518	370,402	370,534	363,658	355,844	343,458
389,724	393,489	410,504	438,885	451,022	444,293	431,827	410,780	385,301
362,528	370,133	384,541	408,820	422,215	416,890	403,991	386,666	363,346
320,180	330,129	350,548	379,727	395,098	393,044	383,202	366,161	339,799
260,211	260,543	272,852	315,579	355,904	369,408	372,171	360,767	342,014
229,988	236,033	247,814	279,853	309,787	317,465	319,072	314,249	299,912
216,471	214,806	219,184	236,660	262,989	266,176	269,870	262,406	250,050
203,125	207,057	221,389	247,440	264,127	265,806	257,965	240,806	218,829
300,137	309,040	323,750	343,855	356,694	355,313	345,271	326,218	298,595
308,365	312,460	330,845	356,479	375,730	374,959	365,934	350,624	322,456
346,640	353,449	370,527	396,642	419,025	417,538	409,416	390,564	362,449
304,467	308,931	324,775	352,109	383,008	388,735	384,711	369,604	346,993
266,701	268,022	278,576	308,614	345,590	353,668	354,001	348,159	334,899
284,789	288,560	299,799	315,086	334,488	333,162	327,238	317,099	300,667
260,673	260,082	270,180	290,488	318,861	323,773	318,575	303,856	282,476
293,956	303,687	316,682	339,658	356,651	353,309	341,807	322,887	295,450
283,761	291,702	307,804	336,830	368,493	370,595	365,250	348,516	322,363
294,631	304,030	320,615	344,402	367,119	364,747	359,344	342,924	316,611
232,589	233,060	242,656	273,476	320,908	337,017	340,296	328,438	309,192
214,148	214,200	218,617	240,493	282,430	295,321	302,218	301,311	292,303
206,195	205,033	210,328	228,101	264,390	276,765	282,016	279,984	274,006
198,953	199,117	210,271	227,747	257,581	262,709	254,897	235,998	211,085
201,411	201,665	204,784	223,859	264,572	271,437	265,866	250,739	227,914
211,565	216,691	224,708	243,638	271,756	270,197	258,983	236,595	209,183
191,452	194,031	198,634	212,646	242,735	246,246	235,263	214,612	185,528
195,383	198,339	203,575	215,745	244,310	248,594	240,969	220,773	195,040
229,330	231,737	240,401	252,386	271,031	270,459	263,796	252,306	234,104
249,897	255,304	261,736	271,966	283,133	277,707	270,146	257,070	240,104
257,655	259,159	261,919	267,864	278,408	299,425	295,472	279,051	252,141
251,009	256,311	266,591	280,051	294,285	308,701	300,086	280,148	252,237
219,104	222,644	229,024	240,712	251,994	276,296	276,826	263,553	238,435

223,527	221,495	225,273	233,579	245,196	268,341	270,436	255,899	228,975
190,699	193,033	196,985	202,033	210,166	242,587	248,216	235,892	209,211
188,544	188,825	190,462	191,762	197,804	220,467	220,703	212,568	196,566
187,867	188,600	191,348	194,277	197,836	220,462	218,218	206,837	193,523
229,452	230,993	242,290	250,097	258,979	274,573	266,935	245,320	220,535
257,073	261,434	277,938	290,251	299,894	313,475	305,111	285,414	257,377
200,916	196,459	201,238	206,491	214,916	245,521	250,512	235,575	211,368
190,412	190,669	197,238	206,080	212,828	236,406	241,073	223,682	195,068
223,638	222,969	228,120	234,768	247,525	272,836	277,110	264,522	247,175
210,643	204,419	205,498	207,158	215,098	247,106	261,749	259,712	250,379
195,942	192,868	196,056	201,748	206,202	223,944	222,616	216,552	195,664
227,102	230,454	241,799	251,170	258,229	273,923	268,536	251,720	228,352
203,480	200,306	203,031	207,475	218,467	249,576	259,357	248,415	223,551
189,397	186,584	192,202	197,564	204,565	233,006	242,594	225,714	198,899
191,468	192,732	199,056	205,222	208,333	229,651	240,377	222,437	190,396
202,041	205,390	213,581	219,710	220,808	239,638	249,045	230,428	198,827
204,614	206,621	210,373	212,759	209,596	224,586	231,106	216,185	193,672
193,265	194,650	196,406	196,995	197,050	211,582	220,944	207,914	187,830
179,024	182,088	187,683	192,222	194,549	213,406	226,283	209,576	182,925
243,872	247,088	253,289	261,846	262,263	275,964	280,069	255,584	219,973
241,751	245,588	251,363	253,918	253,086	264,250	270,364	247,640	213,243
205,349	206,605	213,499	223,300	229,588	238,434	228,656	208,310	182,888
191,278	190,345	197,019	202,437	208,220	230,226	242,101	229,861	207,141
188,617	185,129	186,829	192,849	193,210	211,443	224,549	212,806	195,984
187,906	190,494	195,905	198,578	197,393	210,334	219,754	203,243	183,501
198,505	206,247	216,361	223,295	223,696	236,492	246,937	220,736	186,604
220,694	230,203	241,247	248,812	249,263	257,303	264,107	236,230	195,582
242,084	251,721	266,177	272,574	270,254	273,731	279,996	250,381	207,148
263,003	275,208	289,323	296,342	287,711	285,875	288,644	259,352	214,199
268,660	277,759	285,995	286,900	283,009	283,816	291,118	259,476	215,254
256,819	260,009	256,260	248,665	242,171	246,246	241,605	221,902	195,534
189,485	195,395	199,231	198,911	195,806	206,971	217,647	205,157	187,432
181,062	182,657	188,067	195,038	197,742	216,533	231,382	212,788	184,197
193,545	194,074	200,693	207,642	213,348	233,784	241,236	217,864	187,257
198,258	200,218	207,614	210,342	214,600	229,999	243,609	221,591	187,172
201,999	206,288	215,801	218,170	217,986	229,208	242,254	221,543	187,567
211,872	213,626	220,329	224,354	224,221	240,227	253,663	230,610	195,566
238,907	241,404	248,796	246,752	239,171	242,314	251,640	235,261	210,209
210,965	212,378	218,596	220,193	215,561	213,651	221,707	208,217	187,642
191,180	192,593	200,475	207,822	211,855	222,734	224,929	206,950	182,305
204,164	205,014	211,074	214,115	219,187	235,264	244,248	224,581	194,376
208,012	205,538	208,459	213,519	219,745	231,601	249,452	234,000	206,874
195,496	195,864	201,111	206,678	207,696	220,793	242,088	223,185	191,169
202,120	207,345	215,169	220,583	221,610	230,165	253,035	234,463	200,912
228,207	235,511	243,703	249,453	245,987	249,317	262,580	250,687	227,086
212,301	210,067	210,051	206,412	209,241	214,502	225,246	212,261	193,082
226,913	234,427	243,511	249,067	247,281	249,966	259,135	237,600	204,132

259,578	265,482	275,518	280,454	275,156	268,134	279,926	254,872	213,588
261,796	272,417	284,876	288,975	285,146	275,198	285,240	259,858	216,328
289,261	299,726	315,555	320,687	313,161	302,481	310,236	284,807	239,826
262,425	275,017	288,539	293,074	286,146	275,565	288,594	264,975	224,914
304,583	300,324	294,437	291,634	282,210	278,627	278,628	253,053	217,671
182,662	184,537	187,514	189,625	189,647	194,704	213,270	207,856	190,950
172,360	174,124	177,996	183,278	188,627	201,385	224,536	210,922	184,918
196,857	198,060	208,336	218,430	224,026	233,364	246,072	228,227	196,635
209,763	215,000	226,944	232,867	235,467	241,589	261,612	245,573	211,278
265,844	273,529	290,598	299,382	296,854	294,717	307,087	284,644	240,180
303,783	315,765	329,067	328,763	319,663	313,393	326,239	302,427	259,792
277,886	289,465	298,640	292,222	274,790	255,407	262,089	244,893	216,197
249,906	258,944	263,454	260,982	250,651	240,598	249,749	235,652	207,626
210,384	213,887	223,294	229,520	228,827	232,599	239,553	221,499	192,748
234,369	238,816	248,774	251,489	245,898	237,395	246,997	230,904	199,075
209,001	208,296	215,202	220,146	223,549	224,559	238,932	224,399	193,582
208,792	213,100	220,803	227,636	226,746	228,849	244,567	228,619	196,621
199,510	202,036	210,804	216,582	219,472	224,971	237,345	221,567	194,435
234,265	242,670	255,260	258,508	252,560	244,911	253,278	239,682	213,764
289,048	304,724	318,218	321,766	314,086	296,431	292,967	275,066	240,266
373,354	383,106	393,151	396,968	388,490	375,794	373,999	348,491	298,462
387,856	385,680	388,905	388,304	380,222	364,158	361,022	331,747	281,085
377,153	383,781	390,939	388,796	377,333	357,784	353,825	324,968	277,015
388,520	397,590	405,135	400,804	386,495	365,147	357,670	328,855	279,365
360,981	339,138	326,882	314,419	303,515	295,633	298,993	277,429	240,493
370,790	380,045	383,800	373,289	351,508	328,924	320,263	298,777	264,899
377,355	389,108	395,023	383,948	363,728	339,831	341,384	321,479	283,167
378,123	382,551	384,934	379,880	358,061	336,358	331,377	310,716	275,307
348,490	357,606	361,359	358,021	343,532	330,353	327,675	299,433	255,422
400,577	413,020	425,556	427,705	416,836	395,296	385,261	360,814	310,475
353,188	320,417	308,703	301,177	291,090	281,769	285,875	274,852	243,174
399,210	410,664	417,878	414,598	399,277	377,394	369,310	345,247	295,502
408,820	413,867	422,214	418,647	403,202	378,905	370,900	353,559	315,424
409,252	418,187	414,433	403,163	387,416	369,107	363,627	349,343	316,480
327,194	333,453	340,231	340,303	327,836	308,086	298,056	282,051	242,770
356,374	357,834	349,774	342,230	327,218	312,396	310,981	294,840	256,267
373,799	379,686	379,607	370,373	353,420	336,750	331,571	313,433	275,320
351,616	372,462	391,262	393,712	388,083	369,747	358,874	343,114	301,804
414,299	422,416	430,376	428,119	414,010	393,217	385,413	367,602	324,931
383,185	386,120	389,503	382,534	366,281	352,688	351,608	337,854	304,825
443,333	450,760	457,058	454,460	441,995	418,419	409,359	388,445	350,003
450,217	453,814	461,595	464,241	453,899	438,052	428,449	406,566	360,710
438,135	438,734	434,382	428,196	418,129	402,664	392,993	361,765	313,807
467,558	474,117	477,351	450,447	410,635	380,400	362,112	337,693	293,744
424,108	433,884	443,100	445,222	434,093	408,790	392,012	369,044	319,099
359,451	360,919	375,410	384,747	379,302	365,087	355,970	342,107	300,169
466,710	474,162	481,704	475,558	460,015	439,147	427,924	410,966	371,311

421,134	434,011	442,461	440,432	427,442	404,395	384,601	362,875	321,549
457,140	467,701	476,429	476,800	465,699	448,114	436,513	416,631	369,118
492,698	499,146	502,124	500,198	489,383	468,489	455,771	428,663	375,170
478,820	485,122	493,850	495,794	485,232	464,301	450,685	428,250	382,355
476,981	483,744	495,629	495,402	483,921	459,049	445,688	422,746	373,052
427,636	432,158	439,716	436,212	418,631	395,160	380,374	360,484	315,886
436,164	446,415	456,535	455,399	440,988	415,221	392,827	370,092	329,843
471,497	480,193	484,401	482,311	468,582	445,411	430,980	414,961	376,920
457,253	465,873	473,571	474,546	463,037	443,780	433,601	415,426	375,450
405,956	417,554	427,883	429,997	417,947	392,050	371,516	349,682	303,102
396,540	392,878	388,846	388,081	378,149	354,007	340,635	325,046	283,647
345,692	356,834	368,995	373,053	359,708	333,257	313,909	297,169	257,248
333,500	346,912	360,103	363,313	352,405	328,910	311,690	296,660	257,138
337,779	354,973	369,506	375,751	363,778	339,447	315,476	298,776	263,224
420,571	435,175	443,936	441,825	427,708	402,176	379,893	357,010	330,372
437,236	443,888	447,989	442,708	425,058	396,110	368,481	342,484	319,584
431,133	439,276	446,145	443,734	427,531	407,312	387,535	363,594	313,263
462,842	473,498	483,915	487,075	475,246	452,831	433,084	405,685	354,686
473,948	482,244	489,662	490,130	475,824	455,118	440,158	414,093	363,263
484,690	492,276	496,399	494,104	476,546	455,988	439,726	405,473	353,540
363,789	375,095	388,342	392,220	388,109	367,888	359,197	344,566	310,069
421,934	434,714	439,273	435,237	420,242	392,604	371,086	346,935	306,031
416,806	414,033	412,513	404,344	386,377	373,631	363,923	336,682	297,450
394,731	402,870	417,681	424,562	413,628	396,128	389,431	364,573	320,040
392,816	412,067	429,829	439,473	434,769	414,672	397,281	375,135	330,653
470,392	482,227	492,326	492,845	482,975	459,906	442,743	416,928	370,367
495,918	504,359	505,497	503,534	492,605	472,726	461,010	436,574	387,806
472,445	476,691	473,781	461,259	447,304	429,488	418,460	398,394	360,664
445,701	461,677	465,340	464,006	451,337	430,221	415,680	392,714	353,861
378,916	365,807	372,945	380,247	373,040	359,309	352,552	335,633	299,555
465,340	472,603	472,217	445,396	412,230	385,547	372,413	348,507	305,178
420,078	432,221	443,442	449,802	444,683	427,426	421,962	395,631	353,545
390,177	396,914	397,611	398,923	392,334	376,023	374,079	353,593	313,131
487,873	496,576	502,004	502,328	492,542	468,609	460,175	435,286	389,517
494,670	502,495	505,176	502,698	490,309	463,077	446,038	419,175	377,584
496,602	505,486	508,361	503,730	487,544	462,754	450,468	422,933	380,833
462,782	473,028	479,366	478,704	464,504	441,315	431,242	405,605	359,297
433,468	444,790	454,685	466,030	459,094	438,239	430,022	398,566	351,026
427,509	439,146	451,006	458,606	451,744	430,584	421,304	392,812	347,648
439,725	439,113	440,367	438,993	427,301	411,230	406,696	383,052	341,421
485,709	488,976	491,168	488,822	475,578	451,077	439,715	407,550	357,590
432,175	439,785	437,776	426,189	405,414	382,846	376,089	352,245	317,375
453,284	466,634	469,370	462,461	449,443	428,807	420,096	395,153	354,830
401,360	417,558	429,893	432,766	418,051	392,752	380,984	353,751	308,842
463,576	474,707	477,879	475,201	460,066	440,154	427,622	391,656	340,034
510,987	522,704	531,248	531,253	521,957	503,783	496,142	465,027	416,313
535,155	535,386	539,666	539,955	527,592	512,046	503,873	470,335	419,915

452,274	456,007	460,932	467,391	454,734	434,308	425,419	390,740	338,996
435,199	445,279	449,081	444,362	424,335	393,754	378,062	346,759	304,871
414,720	428,500	437,029	433,080	414,082	383,161	367,926	337,397	297,891
456,018	470,140	479,524	480,839	466,654	442,490	430,218	393,446	341,991
494,002	504,562	512,367	518,831	509,374	492,535	481,583	440,935	387,903
503,682	515,894	525,028	524,857	515,542	499,044	492,238	451,502	400,094
510,831	517,550	528,527	530,977	519,687	502,787	492,442	451,422	399,550
496,675	471,175	457,813	444,249	421,393	409,394	402,671	369,393	321,516
503,559	514,002	517,558	516,308	500,730	475,466	464,773	429,953	388,849
471,412	446,912	426,379	410,202	393,325	381,030	378,826	356,609	324,750
468,408	482,450	492,382	487,724	477,908	464,729	454,435	411,822	358,901
403,710	419,525	432,377	439,029	423,677	396,174	382,649	341,634	288,217
416,591	432,175	438,499	431,473	414,995	398,546	392,709	354,334	305,945
439,578	449,897	458,222	457,856	444,437	420,371	411,334	367,955	316,339
452,157	465,146	472,919	473,420	458,974	436,856	425,882	381,149	326,972
465,692	474,563	480,300	473,112	449,267	423,757	408,107	374,846	336,804
419,456	434,899	433,951	431,568	418,845	401,042	376,510	363,931	323,332
447,677	458,505	465,185	462,392	443,730	423,238	411,217	367,599	315,976
413,291	423,759	431,587	429,531	412,877	392,669	381,532	337,123	287,888
390,110	398,186	401,696	401,339	388,087	378,841	372,966	337,335	290,155
386,724	397,903	404,798	405,569	389,158	366,801	357,742	316,301	266,066
344,975	359,436	370,322	369,578	355,587	334,769	328,193	290,945	246,128
354,018	371,607	383,062	385,446	365,656	335,218	320,119	288,660	252,273
437,245	450,520	456,354	451,223	429,189	409,081	394,309	359,869	320,335
414,847	412,688	405,521	396,458	379,948	374,742	366,553	331,322	288,739
400,913	409,373	417,796	418,941	405,892	394,240	383,343	343,231	295,601
420,366	435,201	443,173	440,700	424,650	409,737	395,528	353,075	303,716
418,652	434,050	446,369	449,042	430,701	411,096	393,853	353,812	302,809
403,345	408,562	406,647	403,929	392,412	386,093	374,503	336,670	291,011
333,317	334,129	333,848	326,460	300,963	284,151	277,243	255,637	227,755
263,646	274,559	282,009	279,065	264,662	254,667	249,730	228,875	201,770
267,071	285,548	300,391	305,167	290,265	276,186	266,900	243,955	215,747
353,710	374,990	388,139	389,915	373,764	361,767	346,537	303,484	256,409
437,201	432,434	421,157	402,751	387,685	391,343	377,238	336,567	292,378
339,851	344,753	351,894	352,100	335,489	328,415	315,132	282,804	239,660
261,649	261,556	265,501	266,633	268,052	280,872	273,240	251,884	219,581
221,521	222,498	229,909	236,325	239,128	249,877	247,876	235,046	216,611
304,968	314,976	321,092	319,772	303,598	300,976	289,405	263,604	233,772
307,257	319,244	328,537	328,024	308,751	303,536	287,995	252,936	214,478
347,198	366,662	380,422	379,932	359,965	351,048	328,095	288,370	243,687
353,893	364,867	369,521	362,112	346,023	346,694	327,902	291,343	245,414
390,431	400,024	404,545	396,363	382,974	378,589	357,252	323,906	284,548
353,745	365,103	374,409	372,976	353,661	356,442	338,742	301,685	253,832
323,271	338,126	346,024	338,782	311,958	299,522	281,605	256,638	226,453
349,264	369,725	380,790	374,661	347,220	331,525	306,445	274,106	239,560
346,025	360,938	370,559	365,133	345,846	346,545	324,309	286,067	243,052
410,444	426,745	437,610	434,127	414,170	405,597	375,258	335,138	285,699

438,095	446,931	446,737	437,505	420,541	411,310	382,502	341,337	292,966
424,189	432,216	438,333	433,098	410,671	401,699	373,413	331,384	280,477
434,975	441,329	441,426	434,253	416,795	412,564	384,955	346,207	302,938
365,901	365,247	364,956	355,170	336,966	331,173	307,142	281,386	251,152
293,519	296,142	287,209	272,963	260,808	265,236	251,236	229,777	205,272
200,940	202,212	206,891	211,016	218,938	237,618	227,499	206,091	178,203
226,268	232,952	240,884	241,802	243,154	260,703	248,251	222,007	191,472
221,360	228,920	236,718	239,351	240,706	255,408	243,380	220,608	187,818
232,001	243,166	253,683	257,673	253,284	262,485	248,420	223,053	189,319
251,477	261,170	267,536	263,832	260,274	274,474	261,436	237,448	204,302
224,568	230,087	234,333	230,684	224,401	231,272	221,253	207,443	188,545
190,061	190,793	191,319	193,070	202,798	218,248	211,889	199,419	182,780
187,210	188,440	193,485	201,369	215,380	234,251	227,770	211,799	189,761
198,217	199,323	203,621	210,386	225,851	244,618	236,329	222,884	200,301
197,607	197,446	200,376	205,344	219,914	238,703	230,237	212,739	189,857
202,081	205,258	211,680	215,132	225,614	238,046	228,958	211,051	184,179
233,558	239,639	246,623	246,911	250,271	258,764	245,462	224,188	194,021
243,225	251,768	258,369	254,046	247,533	245,857	230,424	213,162	192,345
247,049	260,641	268,550	264,145	256,312	253,543	235,224	213,608	189,268
267,924	282,912	292,005	288,140	280,257	278,303	255,268	225,042	194,097
286,000	293,160	295,509	291,383	293,554	291,156	267,600	240,534	209,540
242,968	244,736	246,064	248,243	258,486	257,753	243,175	223,536	192,409
214,492	217,956	220,970	226,398	239,678	240,399	230,907	213,890	187,156
200,189	203,078	206,480	207,329	222,316	234,481	227,622	212,077	189,442
197,703	199,373	202,149	201,616	212,537	220,229	214,743	206,477	189,797
191,214	194,091	198,188	197,057	209,136	215,369	208,287	195,541	179,166
210,807	219,689	229,154	232,307	245,372	250,159	235,001	210,889	181,030
242,713	248,587	252,774	252,376	263,776	266,025	249,649	224,248	189,131
193,393	195,266	201,243	207,503	232,169	239,972	232,138	213,786	185,056
196,892	200,584	207,898	212,191	231,525	237,587	230,556	211,003	183,882
196,852	199,195	203,251	208,315	229,993	239,183	232,007	215,833	192,553
197,434	199,409	203,092	202,461	217,361	219,681	212,548	201,768	187,472
196,077	198,397	202,098	202,094	218,362	219,309	210,261	196,636	178,457
210,547	212,779	220,225	227,083	241,190	242,325	230,339	209,704	182,949
212,101	213,724	219,849	231,200	253,442	254,551	243,014	224,331	196,093
196,779	199,297	204,832	212,923	235,850	241,285	230,679	212,594	184,873
203,144	206,128	210,923	215,750	237,922	240,031	232,754	216,712	186,761
190,307	191,462	197,713	212,382	245,400	256,966	256,109	242,012	217,872
194,464	193,112	196,781	205,491	234,246	242,214	244,430	241,498	231,152
194,722	192,889	190,591	189,456	208,431	214,257	212,811	206,026	192,322
189,310	188,775	189,545	193,614	216,033	222,289	218,805	205,228	184,606

HR24

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168,776	4,616,995	4,618,761	(1,766)
169,017	4,495,011	4,496,569	(1,558)
165,577	4,331,416	4,332,424	(1,008)
157,968	4,324,755	4,325,377	(622)
187,966	5,023,591	5,025,195	(1,604)
182,268	5,031,482	5,033,179	(1,698)
160,606	4,626,899	4,628,536	(1,636)
187,125	4,521,343	4,523,160	(1,818)
181,307	4,790,860	4,792,502	(1,643)
163,692	4,616,716	4,617,451	(736)
156,479	4,531,040	4,531,708	(667)
164,238	4,805,139	4,806,785	(1,646)
173,698	5,030,720	5,032,233	(1,513)
179,421	5,230,416	5,232,098	(1,682)
180,183	5,287,958	5,289,633	(1,675)
170,470	4,978,533	4,980,069	(1,536)
168,271	4,265,554	4,266,565	(1,011)
161,321	4,422,618	4,423,337	(719)
162,848	4,675,707	4,677,362	(1,656)
161,098	4,590,924	4,592,664	(1,740)
160,385	4,655,327	4,656,938	(1,610)
165,320	4,693,177	4,695,046	(1,869)
183,675	4,872,785	4,874,340	(1,555)
165,083	4,542,883	4,544,136	(1,254)
158,501	4,268,811	4,269,391	(580)
171,673	4,714,649	4,716,175	(1,526)
186,120	4,898,189	4,899,722	(1,533)
167,239	4,877,126	4,878,846	(1,720)
170,196	4,752,621	4,754,212	(1,591)
200,006	4,914,176	4,915,877	(1,701)
170,624			(42,872)
171,956			

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166,037

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EBMTRY	EBMTRM	EBMTRD	HR1	HR2	HR3	HR4	HR5	
20C	2009	11	1	64,815	64,435	64,211	63,204	62,805
20C	2009	11	2	74,246	74,712	75,248	76,721	77,769
20C	2009	11	3	90,594	88,903	88,038	88,322	88,516
20C	2009	11	4	86,552	83,738	83,872	89,821	89,587
20C	2009	11	5	86,471	85,573	86,740	84,772	87,637
20C	2009	11	6	91,675	89,052	89,824	87,655	90,167
20C	2009	11	7	75,508	73,074	72,810	71,864	71,564
20C	2009	11	8	68,510	68,020	67,537	67,021	64,286
20C	2009	11	9	70,486	76,627	78,652	77,006	77,110
20C	2009	11	10	87,242	85,243	83,829	83,097	85,533
20C	2009	11	11	88,710	87,478	89,962	86,402	83,989
20C	2009	11	12	83,913	82,609	81,899	75,931	76,217
20C	2009	11	13	81,077	79,068	78,397	78,128	78,517
20C	2009	11	14	65,918	69,052	66,772	63,380	69,262
20C	2009	11	15	68,513	68,164	68,565	68,786	68,330
20C	2009	11	16	70,759	70,831	71,467	72,819	76,974
20C	2009	11	17	83,901	83,394	83,149	85,323	83,650
20C	2009	11	18	86,947	85,443	83,720	83,124	79,956
20C	2009	11	19	85,037	83,653	78,931	75,811	76,349
20C	2009	11	20	91,727	84,478	83,494	81,567	82,837
20C	2009	11	21	78,431	76,524	76,056	75,705	75,191
20C	2009	11	22	69,761	69,748	69,621	68,932	68,904
20C	2009	11	23	75,149	76,321	77,217	78,961	82,634
20C	2009	11	24	87,478	84,677	82,439	80,918	81,482
20C	2009	11	25	90,610	89,474	83,409	83,268	86,833
20C	2009	11	26	72,327	70,834	70,641	69,610	69,521
20C	2009	11	27	58,681	58,878	58,984	59,323	59,279
20C	2009	11	28	63,828	63,964	64,195	64,641	65,720
20C	2009	11	29	67,230	67,083	66,646	67,420	67,510
20C	2009	11	30	77,659	79,637	81,641	81,275	83,323
20C	2009	12	1	87,608	88,559	88,240	86,789	85,979
20C	2009	12	2	85,509	86,924	85,790	85,719	85,829
20C	2009	12	3	90,596	85,282	86,546	84,900	87,234
20C	2009	12	4	91,749	90,765	88,208	89,432	89,822
20C	2009	12	5	84,511	82,687	82,065	81,606	80,858
20C	2009	12	6	70,813	70,685	70,477	70,237	70,046
20C	2009	12	7	74,399	78,661	81,298	80,023	79,928
20C	2009	12	8	87,708	86,180	85,544	87,710	84,927
20C	2009	12	9	88,253	87,034	81,624	83,063	89,118
20C	2009	12	10	88,517	92,654	93,242	92,186	94,367
20C	2009	12	11	90,070	89,123	88,918	84,295	82,931
20C	2009	12	12	84,281	87,224	87,424	83,927	84,261

20C	2009	12	13	71,600	71,121	71,618	72,895	71,764
20C	2009	12	14	74,248	79,010	79,624	80,473	80,235
20C	2009	12	15	92,374	89,887	86,705	85,520	85,232
20C	2009	12	16	90,990	89,174	87,335	79,086	76,497
20C	2009	12	17	84,360	90,599	88,142	86,237	87,763
20C	2009	12	18	87,349	87,095	85,293	84,797	81,454
20C	2009	12	19	73,232	72,545	72,892	71,752	72,553
20C	2009	12	20	71,536	70,996	70,351	70,367	69,996
20C	2009	12	21	74,981	75,454	76,484	77,484	81,618
20C	2009	12	22	87,173	86,180	85,253	84,047	83,838
20C	2009	12	23	87,852	87,495	85,448	84,279	83,465
20C	2009	12	24	69,927	68,196	68,275	67,516	66,177
20C	2009	12	25	58,076	58,251	58,095	58,062	58,113
20C	2009	12	26	61,168	61,322	60,014	59,522	59,638
20C	2009	12	27	69,073	69,753	70,000	70,156	70,429
20C	2009	12	28	75,192	76,438	76,677	74,198	74,669
20C	2009	12	29	87,366	86,525	86,033	85,073	85,700
20C	2009	12	30	87,842	88,554	88,557	83,919	83,663
20C	2009	12	31	85,620	84,074	77,920	72,504	72,878
201	2010	1	1	78,318	79,385	73,237	74,314	74,849
201	2010	1	2	70,913	70,049	70,235	69,343	69,400
201	2010	1	3	69,788	70,745	70,418	69,874	69,714
201	2010	1	4	75,457	76,841	78,256	81,223	86,534
201	2010	1	5	94,229	92,902	92,451	91,024	90,579
201	2010	1	6	95,076	91,259	89,435	88,839	88,908
201	2010	1	7	93,860	91,774	91,453	88,428	88,067
201	2010	1	8	95,607	89,861	92,600	90,617	89,406
201	2010	1	9	85,273	78,275	73,856	71,802	71,841
201	2010	1	10	74,354	74,361	74,483	73,550	73,656
201	2010	1	11	75,196	75,672	76,558	76,557	78,255
201	2010	1	12	88,693	85,947	82,199	88,939	91,429
201	2010	1	13	96,039	90,899	86,284	80,773	79,147
201	2010	1	14	96,246	89,454	91,078	87,837	90,413
201	2010	1	15	92,007	90,067	92,455	91,771	89,071
201	2010	1	16	84,764	82,195	80,970	79,681	83,758
201	2010	1	17	71,716	71,086	70,878	70,512	70,513
201	2010	1	18	74,604	75,968	76,673	77,460	81,822
201	2010	1	19	92,070	91,349	88,931	82,186	77,030
201	2010	1	20	74,387	72,999	72,248	74,405	78,482
201	2010	1	21	90,656	88,456	87,090	85,627	86,432
201	2010	1	22	93,313	89,004	86,998	88,856	90,699
201	2010	1	23	83,880	81,625	80,923	79,496	81,590
201	2010	1	24	67,031	66,874	66,471	66,506	66,655
201	2010	1	25	66,236	67,538	70,632	73,439	71,296
201	2010	1	26	91,467	89,494	89,858	87,824	88,186
201	2010	1	27	95,848	93,649	91,288	89,489	91,411
201	2010	1	28	93,919	91,772	92,695	93,376	94,883

201	2010	1	29	92,027	90,581	89,476	88,403	88,838
201	2010	1	30	80,259	78,420	76,603	74,615	74,641
201	2010	1	31	69,435	69,615	69,809	69,415	70,445
201	2010	2	1	73,845	74,640	74,153	75,203	76,219
201	2010	2	2	93,253	90,001	88,386	87,880	88,316
201	2010	2	3	92,224	85,724	88,818	87,023	89,764
201	2010	2	4	90,929	91,719	89,519	88,914	91,591
201	2010	2	5	93,620	93,758	92,155	90,094	91,093
201	2010	2	6	88,491	82,715	79,780	81,705	76,998
201	2010	2	7	81,878	81,665	79,490	81,318	80,930
201	2010	2	8	79,164	80,341	81,138	80,572	82,220
201	2010	2	9	89,743	88,682	91,451	86,067	91,363
201	2010	2	10	92,612	90,611	90,552	85,718	86,583
201	2010	2	11	91,176	91,417	90,599	91,791	95,214
201	2010	2	12	93,778	94,664	94,627	93,253	91,761
201	2010	2	13	90,122	88,992	83,416	80,540	84,592
201	2010	2	14	80,795	79,745	79,993	79,075	82,004
201	2010	2	15	84,844	87,133	87,814	88,155	85,390
201	2010	2	16	94,538	92,145	87,112	83,509	85,548
201	2010	2	17	89,581	87,749	87,258	85,287	85,046
201	2010	2	18	87,687	89,117	88,826	88,038	88,946
201	2010	2	19	88,951	90,202	88,555	87,517	87,868
201	2010	2	20	85,934	84,991	83,987	83,978	81,847
201	2010	2	21	77,596	77,548	78,495	74,445	73,989
201	2010	2	22	80,613	79,139	78,085	79,152	76,313
201	2010	2	23	94,908	94,006	89,620	84,867	86,447
201	2010	2	24	88,443	85,212	85,163	83,293	83,977
201	2010	2	25	95,726	94,284	93,243	92,578	93,247
201	2010	2	26	90,482	95,819	92,605	91,740	90,842
201	2010	2	27	85,510	84,878	86,874	84,939	85,837
201	2010	2	28	77,459	77,657	77,108	81,047	80,342
201	2010	3	1	74,971	79,892	82,275	80,560	81,150
201	2010	3	2	90,565	88,438	86,207	85,006	87,300
201	2010	3	3	90,504	87,233	89,633	88,327	88,703
201	2010	3	4	87,361	86,871	90,939	90,734	91,073
201	2010	3	5	87,624	89,454	88,986	87,355	88,934
201	2010	3	6	83,147	80,887	80,169	79,321	79,887
201	2010	3	7	80,632	79,597	80,337	79,997	78,690
201	2010	3	8	79,136	79,106	79,356	81,465	82,433
201	2010	3	9	89,991	86,454	88,506	87,668	85,708
201	2010	3	10	93,687	88,312	89,087	88,122	87,844
201	2010	3	11	85,280	84,333	83,836	80,874	82,648
201	2010	3	12	92,137	85,761	86,755	85,397	85,074
201	2010	3	13	84,414	81,700	81,079	80,078	79,668
201	2010	3	14	79,196	79,963	-	79,428	79,608
201	2010	3	15	79,283	78,633	77,111	76,055	76,671
201	2010	3	16	88,076	85,046	83,837	83,305	84,665

201	2010	3	17	83,502	81,830	81,427	76,403	75,456
201	2010	3	18	88,572	89,774	89,465	88,958	89,148
201	2010	3	19	88,103	89,085	86,304	82,047	88,112
201	2010	3	20	85,889	84,798	83,848	83,041	79,547
201	2010	3	21	72,445	71,605	70,283	69,708	72,599
201	2010	3	22	81,010	81,326	80,831	77,050	80,986
201	2010	3	23	93,948	92,216	88,885	88,672	84,044
201	2010	3	24	93,064	90,386	88,070	85,214	85,806
201	2010	3	25	91,514	90,945	89,924	82,257	81,101
201	2010	3	26	88,904	84,702	87,775	86,318	85,712
201	2010	3	27	87,298	84,957	84,223	81,347	81,709
201	2010	3	28	78,774	78,603	76,769	75,777	76,207
201	2010	3	29	81,543	79,605	79,780	79,548	80,926
201	2010	3	30	91,586	86,537	85,686	88,337	87,820
201	2010	3	31	89,987	87,447	86,156	85,914	89,333
201	2010	4	1	86,954	84,762	84,322	79,171	80,487
201	2010	4	2	85,965	85,437	84,796	83,867	83,529
201	2010	4	3	82,368	82,063	79,989	78,277	76,655
201	2010	4	4	75,028	76,059	76,335	75,451	76,610
201	2010	4	5	78,601	75,911	77,668	77,222	80,654
201	2010	4	6	92,082	86,887	86,236	84,896	86,150
201	2010	4	7	92,381	82,638	86,103	80,614	81,303
201	2010	4	8	89,499	86,821	86,307	85,352	87,009
201	2010	4	9	86,192	82,733	83,856	82,298	84,364
201	2010	4	10	80,559	72,407	73,407	74,351	77,772
201	2010	4	11	75,270	74,815	74,834	74,396	74,317
201	2010	4	12	78,277	78,152	81,976	81,800	79,342
201	2010	4	13	92,729	89,107	86,429	82,125	83,887
201	2010	4	14	94,941	91,855	88,716	82,891	84,958
201	2010	4	15	93,767	87,404	88,324	83,521	88,534
201	2010	4	16	90,849	87,491	90,575	84,872	86,454
201	2010	4	17	81,097	77,581	78,284	79,892	79,216
201	2010	4	18	79,916	74,786	77,991	77,689	78,022
201	2010	4	19	77,928	80,319	81,296	80,184	81,584
201	2010	4	20	91,882	87,317	86,399	86,282	87,137
201	2010	4	21	92,490	86,789	76,607	67,630	68,037
201	2010	4	22	85,877	85,511	87,237	86,850	86,382
201	2010	4	23	88,841	85,936	86,293	84,174	85,054
201	2010	4	24	87,545	87,502	86,899	85,076	84,479
201	2010	4	25	78,549	77,789	76,771	76,986	76,614
201	2010	4	26	80,156	79,334	79,899	81,087	82,372
201	2010	4	27	87,767	84,969	83,804	82,864	84,699
201	2010	4	28	90,114	89,470	86,934	82,160	83,222
201	2010	4	29	88,996	86,055	84,475	85,448	83,746
201	2010	4	30	92,173	91,650	84,955	86,441	87,509
201	2010	5	1	82,203	82,500	83,522	76,469	77,573
201	2010	5	2	76,339	76,065	75,122	74,487	76,750

201	2010	5	3	74,252	70,908	75,014	73,538	74,127
201	2010	5	4	82,100	80,563	78,787	77,910	78,221
201	2010	5	5	83,041	81,443	80,789	78,966	79,023
201	2010	5	6	84,206	80,919	79,424	78,340	78,185
201	2010	5	7	84,449	80,793	80,147	78,338	79,069
201	2010	5	8	86,695	83,948	83,181	81,435	80,443
201	2010	5	9	81,156	79,028	78,401	79,769	77,734
201	2010	5	10	79,233	77,208	77,832	80,734	79,776
201	2010	5	11	89,667	87,755	85,609	88,125	88,959
201	2010	5	12	91,507	88,455	83,632	80,810	82,843
201	2010	5	13	91,519	89,025	87,322	86,836	86,470
201	2010	5	14	90,419	86,164	85,148	84,542	87,337
201	2010	5	15	83,518	80,060	80,095	75,418	76,252
201	2010	5	16	79,022	79,042	80,548	79,048	76,724
201	2010	5	17	81,906	80,948	82,236	82,867	83,649
201	2010	5	18	79,041	75,349	75,362	74,321	74,766
201	2010	5	19	81,338	77,630	71,454	70,265	69,012
201	2010	5	20	80,068	77,451	77,427	77,283	76,412
201	2010	5	21	87,658	85,220	83,811	81,168	84,928
201	2010	5	22	86,156	84,073	84,537	86,090	82,756
201	2010	5	23	81,785	81,681	79,931	80,161	72,989
201	2010	5	24	81,093	80,195	80,376	80,806	82,931
201	2010	5	25	97,247	94,940	93,981	92,146	93,916
201	2010	5	26	92,349	91,451	90,676	90,791	91,053
201	2010	5	27	95,862	91,769	91,016	88,896	89,291
201	2010	5	28	94,375	91,745	89,008	85,533	85,080
201	2010	5	29	85,577	84,703	84,390	82,280	78,404
201	2010	5	30	77,139	77,379	77,564	79,789	80,216
201	2010	5	31	75,132	71,491	74,225	73,696	75,426
201	2010	6	1	78,740	77,103	78,351	80,404	81,109
201	2010	6	2	93,628	90,635	86,579	78,980	77,293
201	2010	6	3	88,476	86,899	86,273	86,948	84,129
201	2010	6	4	88,447	91,477	91,621	88,831	89,730
201	2010	6	5	88,486	86,098	84,901	86,123	85,986
201	2010	6	6	84,178	82,987	81,276	79,915	80,337
201	2010	6	7	81,053	78,899	79,641	87,258	86,518
201	2010	6	8	96,064	87,802	90,932	89,264	89,493
201	2010	6	9	87,018	84,298	82,581	81,429	81,843
201	2010	6	10	88,601	85,898	83,983	81,845	82,429
201	2010	6	11	88,354	85,914	82,837	81,194	82,346
201	2010	6	12	84,462	82,745	86,324	82,078	79,254
201	2010	6	13	78,686	77,297	78,414	75,331	77,037
201	2010	6	14	80,443	79,906	81,742	81,865	81,331
201	2010	6	15	90,239	89,085	87,909	85,049	87,127
201	2010	6	16	96,739	95,362	92,739	92,446	93,069
201	2010	6	17	94,379	92,782	95,448	89,965	89,680
201	2010	6	18	93,290	88,639	86,710	85,326	86,326

201	2010	6	19	89,282	87,695	88,420	85,131	88,280
201	2010	6	20	81,499	79,550	77,711	76,531	80,733
201	2010	6	21	78,637	81,268	81,106	80,870	86,025
201	2010	6	22	90,382	85,980	86,273	89,047	91,136
201	2010	6	23	89,582	89,549	89,494	87,863	86,770
201	2010	6	24	95,175	88,541	89,795	84,590	88,050
201	2010	6	25	91,211	89,131	87,425	85,282	89,402
201	2010	6	26	84,108	83,471	83,099	81,145	83,005
201	2010	6	27	75,390	75,364	75,094	74,344	74,280
201	2010	6	28	77,670	78,580	82,408	81,261	83,022
201	2010	6	29	87,240	87,337	86,644	86,705	85,786
201	2010	6	30	86,518	89,475	87,492	85,226	85,902
201	2010	7	1	89,807	85,075	86,979	83,450	83,154
201	2010	7	2	79,886	78,456	77,139	76,371	76,890
201	2010	7	3	78,155	80,632	80,513	80,534	78,698
201	2010	7	4	81,914	81,723	79,751	78,333	77,761
201	2010	7	5	72,336	73,445	70,115	70,271	70,770
201	2010	7	6	80,444	79,827	84,616	82,832	81,873
201	2010	7	7	88,290	86,438	84,604	82,105	81,880
201	2010	7	8	87,423	85,703	84,639	82,601	81,419
201	2010	7	9	87,909	86,187	86,323	85,081	85,803
201	2010	7	10	74,699	77,088	79,930	76,598	77,996
201	2010	7	11	76,232	75,477	75,774	74,935	74,751
201	2010	7	12	78,038	79,749	79,805	75,234	76,381
201	2010	7	13	92,562	89,081	90,637	88,780	89,318
201	2010	7	14	96,367	94,634	93,546	92,057	91,596
201	2010	7	15	86,951	87,257	86,066	84,915	86,076
201	2010	7	16	90,696	87,598	86,180	83,289	87,951
201	2010	7	17	86,154	82,372	86,052	83,680	83,029
201	2010	7	18	80,001	78,672	78,164	77,538	77,797
201	2010	7	19	75,843	78,132	78,751	78,491	79,580
201	2010	7	20	91,200	88,578	88,881	88,164	91,472
201	2010	7	21	76,513	68,643	67,636	61,579	59,851
201	2010	7	22	63,373	61,246	58,880	56,021	59,827
201	2010	7	23	89,157	82,779	84,578	83,102	85,811
201	2010	7	24	87,801	85,200	87,038	82,301	81,208
201	2010	7	25	80,810	82,806	84,290	78,473	78,515
201	2010	7	26	80,560	81,858	76,355	75,654	81,107
201	2010	7	27	89,982	85,953	82,193	84,368	84,025
201	2010	7	28	94,497	85,433	80,316	78,431	78,900
201	2010	7	29	89,761	85,592	87,233	85,665	85,922
201	2010	7	30	87,629	85,453	82,837	81,096	81,874
201	2010	7	31	85,342	82,678	82,439	82,923	83,522
201	2010	8	1	79,524	81,161	80,653	79,603	76,454
201	2010	8	2	74,743	74,279	77,491	77,360	79,395
201	2010	8	3	93,126	87,969	90,143	92,145	88,824
201	2010	8	4	92,901	86,993	87,382	86,193	84,058

201	2010	8	5	87,352	89,595	89,792	88,160	86,261
201	2010	8	6	94,070	93,882	90,604	88,227	86,469
201	2010	8	7	86,496	83,614	83,374	82,656	81,863
201	2010	8	8	76,859	76,148	74,923	73,270	75,646
201	2010	8	9	74,759	75,496	75,337	75,357	78,247
201	2010	8	10	92,128	91,355	90,993	92,224	92,028
201	2010	8	11	91,463	89,796	90,699	90,747	85,122
201	2010	8	12	93,080	95,464	93,934	92,553	93,471
201	2010	8	13	94,206	92,072	90,461	86,772	88,171
201	2010	8	14	85,534	84,224	84,107	81,755	78,851
201	2010	8	15	82,802	82,057	83,043	81,789	81,185
201	2010	8	16	78,166	78,745	77,929	78,260	78,724
201	2010	8	17	92,534	94,211	94,552	93,545	93,446
201	2010	8	18	98,278	94,690	91,551	89,331	90,542
201	2010	8	19	90,370	87,530	88,670	82,079	82,045
201	2010	8	20	92,579	89,348	89,014	85,710	87,773
201	2010	8	21	86,206	86,854	86,330	82,814	81,145
201	2010	8	22	77,680	78,514	77,167	77,795	80,042
201	2010	8	23	75,753	78,549	81,109	76,768	77,639
201	2010	8	24	92,531	92,464	92,241	89,570	90,299
201	2010	8	25	97,072	94,430	90,360	85,875	86,721
201	2010	8	26	91,282	89,591	88,064	87,596	91,732
201	2010	8	27	92,479	91,502	92,185	91,182	91,783
201	2010	8	28	86,551	85,196	84,603	80,585	79,828
201	2010	8	29	84,794	81,255	79,502	80,397	79,279
201	2010	8	30	79,524	80,132	78,190	75,978	77,870
201	2010	8	31	91,017	86,010	84,650	85,338	92,103
201	2010	9	1	93,079	89,229	91,862	89,219	86,018
201	2010	9	2	95,770	96,007	94,058	89,150	89,376
201	2010	9	3	89,642	90,442	89,829	88,364	86,913
201	2010	9	4	79,369	77,263	75,874	76,621	76,019
201	2010	9	5	79,166	75,493	75,810	74,168	73,594
201	2010	9	6	74,823	73,353	72,534	70,991	70,292
201	2010	9	7	70,885	68,432	72,611	76,054	73,884
201	2010	9	8	88,064	83,469	85,267	81,128	80,007
201	2010	9	9	90,492	90,125	89,161	86,593	88,499
201	2010	9	10	91,189	88,494	87,626	85,484	87,233
201	2010	9	11	90,182	86,364	85,323	86,291	85,556
201	2010	9	12	80,483	80,087	79,554	78,255	80,208
201	2010	9	13	78,626	78,542	77,863	76,887	78,700
201	2010	9	14	94,911	94,351	92,990	90,203	90,515
201	2010	9	15	95,981	88,228	87,027	83,699	85,320
201	2010	9	16	92,033	85,405	87,110	87,072	86,696
201	2010	9	17	97,281	93,509	92,815	91,357	90,781
201	2010	9	18	90,121	84,130	82,378	81,309	81,731
201	2010	9	19	83,612	82,902	82,049	79,787	76,355
201	2010	9	20	80,590	80,279	81,345	80,938	80,979

201	2010	9	21	97,222	88,556	90,955	93,204	94,180
201	2010	9	22	96,212	92,292	90,360	84,714	85,905
201	2010	9	23	92,858	89,801	89,760	85,436	87,673
201	2010	9	24	88,153	86,521	90,434	89,841	90,935
201	2010	9	25	89,942	89,624	91,467	90,212	87,066
201	2010	9	26	81,319	84,141	81,572	80,792	83,736
201	2010	9	27	80,182	85,949	83,743	83,482	84,977
201	2010	9	28	96,223	90,652	93,213	90,854	87,028
201	2010	9	29	96,139	94,126	95,041	87,488	86,539
201	2010	9	30	91,438	88,732	90,185	88,977	88,476
201	2010	10	1	90,199	84,239	86,869	84,324	82,974
201	2010	10	2	84,646	84,025	83,570	80,391	78,943
201	2010	10	3	77,904	76,886	77,627	75,523	73,133
201	2010	10	4	77,780	75,488	77,894	78,319	80,885
201	2010	10	5	87,351	86,468	89,389	85,293	85,495
201	2010	10	6	92,908	89,593	88,149	85,342	86,655
201	2010	10	7	87,019	82,730	82,432	82,301	81,600
201	2010	10	8	89,448	86,355	86,773	84,531	82,092
201	2010	10	9	76,858	75,975	74,966	75,805	74,385
201	2010	10	10	70,080	70,837	71,748	72,746	73,703
201	2010	10	11	75,920	76,079	77,547	76,086	78,558
201	2010	10	12	85,575	85,029	88,369	86,969	87,320
201	2010	10	13	83,750	81,060	79,911	79,821	79,103
201	2010	10	14	82,386	83,479	82,608	81,688	82,562
201	2010	10	15	94,250	91,371	89,747	85,752	86,989
201	2010	10	16	82,224	81,471	82,300	83,083	77,842
201	2010	10	17	73,267	72,524	73,337	72,493	72,201
201	2010	10	18	77,786	79,333	78,542	77,702	80,481
201	2010	10	19	93,284	92,864	90,663	89,406	88,316
201	2010	10	20	93,631	91,780	91,132	86,897	86,564
201	2010	10	21	93,988	89,194	87,882	85,551	82,321
201	2010	10	22	93,428	91,497	91,672	84,755	84,103
201	2010	10	23	86,418	84,238	84,820	82,664	82,368
201	2010	10	24	77,995	79,186	77,958	77,086	77,150
201	2010	10	25	75,871	75,975	75,863	75,489	73,553
201	2010	10	26	83,858	81,806	79,848	79,367	81,315
201	2010	10	27	87,424	85,807	85,167	83,458	82,235
201	2010	10	28	86,611	85,035	82,973	79,062	77,343
201	2010	10	29	80,866	79,502	76,606	75,614	75,325
201	2010	10	30	70,600	70,423	69,641	68,869	67,710
201	2010	10	31	62,350	62,596	62,383	62,121	62,135

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HR6	HR7	HR8	HR9	HR10	HR11	HR12	HR13	HR14
62,832	61,766	61,579	62,561	62,249	62,172	61,026	60,788	62,086
79,390	81,287	81,057	82,894	85,013	85,136	85,573	86,705	87,932
90,966	96,259	94,104	98,071	97,189	96,763	96,453	95,446	98,327
87,941	90,395	94,406	88,702	82,710	87,156	86,597	83,604	80,659
92,218	97,214	97,436	98,312	96,261	93,842	96,695	98,882	98,706
92,783	95,329	94,819	96,137	93,853	93,350	89,272	90,819	91,238
71,163	70,591	67,224	67,836	67,637	68,517	67,634	67,486	67,545
59,538	51,633	48,987	48,741	48,617	48,732	46,947	46,204	48,313
80,985	84,048	85,659	87,616	91,535	92,238	90,610	90,686	91,062
84,108	89,948	91,600	94,222	91,979	91,380	90,531	93,292	95,386
88,430	91,869	90,450	92,855	92,522	91,870	91,018	91,430	91,262
78,432	86,571	84,646	85,325	84,929	86,585	86,428	87,426	87,078
80,813	84,048	82,413	82,438	82,582	83,708	82,164	82,380	81,060
68,377	67,801	67,290	67,387	67,267	67,961	69,189	69,207	68,593
68,216	67,256	68,864	68,959	68,880	69,150	68,456	68,032	69,289
80,974	83,615	83,194	85,944	86,561	84,809	85,795	85,260	84,149
86,912	89,676	89,718	91,433	90,550	89,975	88,297	92,769	91,972
81,444	85,686	90,016	90,572	91,048	87,889	86,628	93,147	93,850
85,315	92,998	96,181	95,077	93,963	92,315	90,813	89,949	91,689
85,104	86,822	88,165	89,293	89,583	90,573	84,959	85,116	84,409
74,825	74,229	72,779	74,182	73,965	73,604	72,461	72,941	73,633
68,343	68,008	67,906	68,167	67,510	67,133	66,592	66,744	67,439
86,712	86,388	86,608	85,776	84,610	88,150	91,187	91,677	91,653
82,359	85,361	84,715	90,028	88,363	92,851	89,180	84,822	85,215
87,326	88,791	90,335	92,603	93,565	94,030	93,260	91,364	93,978
67,853	65,537	61,771	61,166	59,764	58,926	58,782	58,869	58,812
59,418	59,140	61,208	61,946	62,246	63,000	62,229	61,572	60,954
67,994	70,793	70,243	74,768	75,108	75,517	75,680	77,087	76,984
67,648	67,576	66,943	67,230	67,367	66,518	65,847	66,756	66,872
84,350	88,248	87,330	88,618	89,648	91,286	90,457	94,943	92,219
88,263	88,886	90,045	90,188	92,874	92,648	92,760	91,169	91,621
84,831	85,961	86,624	89,724	90,623	91,843	85,913	81,999	78,864
90,154	92,178	93,670	93,159	92,370	91,248	95,128	96,235	97,374
91,374	92,754	90,063	89,457	89,092	88,279	89,695	90,507	92,238
75,724	78,024	81,220	77,064	72,151	77,272	73,182	74,296	75,964
69,422	69,249	69,407	69,240	68,334	67,854	67,161	66,504	66,827
79,456	83,043	83,479	88,510	92,770	91,995	90,877	91,694	91,352
83,046	86,670	89,578	95,584	95,319	95,483	97,560	98,385	99,073
90,139	94,127	96,950	98,190	98,880	98,042	94,174	94,844	97,444
95,728	96,393	94,700	96,243	98,280	100,244	100,115	98,797	97,555
87,912	90,200	87,784	91,235	95,696	94,759	89,972	91,163	91,744
83,372	82,525	82,609	82,835	81,904	79,039	80,538	80,002	80,803

71,327	70,750	70,344	70,260	70,041	69,495	68,223	68,374	68,135
80,579	83,437	83,834	85,687	89,698	91,472	91,061	90,505	91,707
89,602	92,777	91,267	93,322	93,722	94,212	93,466	91,664	91,739
82,175	84,734	87,485	89,794	91,131	90,432	90,268	89,569	89,996
88,702	91,717	90,086	91,641	92,587	94,644	92,942	91,624	90,237
82,188	86,470	89,235	88,070	86,735	89,246	88,415	87,648	83,889
70,715	71,671	72,082	72,379	73,697	74,307	73,428	74,132	73,353
67,255	67,362	66,647	67,183	67,110	67,703	68,011	68,793	69,282
86,272	88,337	86,571	87,062	86,329	89,284	90,116	90,874	90,339
88,057	92,323	91,272	93,372	95,273	93,325	91,640	89,999	87,193
83,076	86,368	87,908	88,795	88,864	89,777	89,230	85,338	88,044
66,099	64,374	62,844	62,713	62,942	61,973	58,188	57,523	59,097
58,089	58,337	58,237	59,686	59,822	59,572	59,604	60,023	59,940
60,033	60,543	63,587	64,810	65,007	67,985	67,413	67,557	68,012
69,065	68,637	67,480	67,842	67,588	68,134	67,759	67,376	67,424
74,682	77,484	78,731	78,605	79,100	84,013	82,090	85,532	81,223
85,749	88,064	90,188	91,569	89,230	89,029	87,547	84,855	85,495
84,599	85,103	85,976	88,457	85,659	89,335	85,929	90,394	89,841
77,836	80,410	82,944	81,411	80,271	81,373	80,566	81,133	79,241
74,052	73,795	72,871	75,407	74,201	72,859	70,749	70,298	69,448
69,626	67,556	68,067	70,675	71,807	73,369	72,663	74,358	74,348
68,992	68,462	68,965	69,924	69,545	69,557	68,775	68,861	68,018
89,869	90,199	88,003	91,310	93,362	96,932	95,666	91,266	90,485
92,648	96,303	96,099	94,973	95,128	99,120	94,817	94,820	91,428
93,323	97,172	98,099	96,964	96,808	95,734	93,150	93,991	100,190
91,788	97,993	98,584	97,760	99,170	98,881	100,181	101,853	100,602
95,025	96,908	98,386	99,278	100,058	100,532	96,021	95,020	93,625
70,541	69,648	73,298	74,834	75,472	75,286	75,824	74,968	75,224
73,669	73,314	72,414	71,764	71,531	71,637	71,210	70,766	70,480
81,341	83,537	86,366	87,917	89,097	90,356	88,998	94,978	93,019
93,727	98,186	98,268	89,042	87,736	92,140	96,198	99,720	99,835
83,441	89,259	89,740	91,512	91,526	85,015	86,214	87,460	87,638
91,279	95,875	90,540	93,929	100,339	95,867	97,032	98,568	99,143
91,752	93,491	93,032	95,928	98,214	95,522	94,398	94,164	93,860
87,187	81,724	75,593	78,494	83,961	82,590	81,127	78,469	79,939
69,495	67,934	66,787	66,092	66,139	65,619	65,440	65,822	66,164
84,289	88,199	88,901	92,958	95,342	95,216	95,482	95,991	97,345
73,070	74,802	74,396	78,755	78,185	72,438	72,053	73,298	71,078
89,296	92,209	93,984	97,197	95,740	93,060	94,980	96,198	96,321
91,440	93,724	93,131	86,467	88,278	89,830	90,013	91,807	92,441
93,290	96,478	96,304	94,438	96,358	96,102	95,274	95,084	94,439
81,499	82,683	84,545	83,270	81,602	81,791	83,241	84,021	80,087
67,327	66,607	65,959	64,901	64,353	64,365	63,759	64,035	64,809
72,623	76,655	76,809	79,676	80,122	80,355	80,141	79,744	80,409
91,054	92,678	94,893	97,308	100,077	101,429	100,407	101,324	103,209
94,411	95,883	96,263	93,600	91,992	93,190	97,347	97,652	96,056
96,134	99,647	95,325	98,211	92,028	92,915	92,005	92,508	93,913

92,115	95,483	96,615	98,262	99,348	99,716	97,926	97,567	97,911
73,785	75,613	79,719	80,423	79,866	78,941	78,195	77,478	75,546
71,740	71,199	70,806	70,308	69,681	69,659	69,407	68,274	67,786
77,655	81,758	83,566	84,505	85,941	87,726	88,020	90,470	89,078
91,897	92,777	91,922	92,189	93,409	93,169	93,481	93,872	97,106
91,697	92,834	91,238	89,974	91,241	93,649	92,984	94,385	95,734
95,283	98,252	99,700	100,689	100,654	100,178	100,744	98,057	99,224
92,757	93,992	93,353	96,923	95,956	92,536	93,135	91,468	94,201
76,345	77,121	77,960	79,174	78,913	78,934	77,928	78,224	79,013
78,556	78,744	78,284	78,164	78,013	78,099	78,597	74,910	77,505
84,577	87,697	90,077	92,011	92,749	92,476	92,759	93,082	93,512
88,495	90,602	92,555	90,799	95,125	95,845	95,228	94,783	95,671
88,566	92,323	92,280	94,722	95,672	94,934	94,993	95,121	95,130
98,265	97,482	95,584	90,395	92,826	95,950	96,209	99,951	102,131
92,449	95,814	97,637	96,584	94,508	94,261	95,092	100,195	99,028
84,514	87,267	87,423	89,190	88,673	92,243	85,894	88,054	83,963
83,171	80,689	78,532	78,863	79,854	81,724	82,711	81,318	77,715
87,508	90,972	90,526	87,726	91,471	94,375	93,426	94,614	94,452
88,149	92,445	93,005	95,151	96,518	96,741	95,787	95,927	95,749
88,385	90,204	92,096	94,440	96,724	95,779	94,536	92,913	94,256
92,195	95,908	95,920	97,270	93,582	96,043	95,829	97,371	98,280
87,386	91,219	89,887	93,439	92,471	90,092	89,261	90,511	93,762
79,696	77,866	79,480	79,329	79,489	78,798	78,171	79,205	76,981
75,306	76,222	77,337	73,132	74,931	74,392	70,965	69,470	67,405
80,085	86,749	89,357	92,198	92,283	93,789	93,660	93,460	95,008
88,406	90,577	92,135	94,053	94,208	95,707	95,416	95,675	97,090
86,004	89,443	91,447	91,863	92,163	93,542	95,786	95,531	94,741
95,245	97,039	98,465	99,676	96,532	97,459	97,093	98,340	97,741
90,576	91,813	88,502	90,287	92,815	95,439	94,644	96,504	93,769
85,672	86,105	85,788	86,382	86,732	85,480	84,925	82,898	82,593
80,533	78,843	73,469	71,196	71,826	72,246	72,709	71,373	70,115
81,711	84,469	82,972	81,471	83,228	83,263	83,949	85,298	83,950
89,842	94,169	97,765	97,560	95,746	96,880	92,762	94,212	93,517
87,930	90,258	89,262	90,979	93,538	95,983	96,582	95,487	97,630
93,574	96,293	91,801	93,992	92,645	89,612	97,706	95,626	92,517
89,173	93,221	95,856	98,946	99,493	98,274	98,380	98,480	99,830
80,272	80,766	81,480	82,752	79,031	82,849	82,234	81,659	80,618
77,623	74,586	75,312	74,795	73,304	72,643	72,109	71,380	72,376
81,811	83,807	85,609	89,567	91,501	95,267	96,206	92,752	90,205
86,943	91,132	88,784	91,664	92,991	94,828	98,503	100,617	98,132
84,827	87,897	91,814	94,782	92,039	89,048	89,856	91,291	92,418
82,531	84,984	85,297	87,106	88,578	90,132	91,599	93,967	94,085
86,966	90,328	91,900	85,278	84,076	90,734	95,848	96,108	93,747
77,837	78,108	78,355	82,891	81,153	79,686	80,228	82,556	81,690
79,176	77,860	71,482	73,589	76,428	76,381	75,714	74,532	72,084
81,613	85,550	87,618	89,491	90,444	94,381	90,772	91,594	89,822
85,927	88,596	89,452	92,984	95,197	95,313	94,931	93,522	92,531

78,846	83,681	83,821	84,175	87,713	87,934	89,746	93,979	93,585
89,638	92,934	95,549	96,445	93,362	93,960	93,998	93,015	92,720
88,100	90,969	92,959	92,920	93,279	95,186	96,506	95,087	94,761
76,062	75,288	75,371	74,806	74,648	73,049	73,707	76,433	78,099
71,987	71,888	73,031	72,559	71,870	72,976	72,005	71,770	70,516
85,334	86,419	85,436	88,642	98,074	99,177	99,820	93,392	95,426
85,039	82,418	80,269	82,169	76,635	74,168	72,987	78,936	82,216
88,928	95,292	98,152	98,575	98,276	96,348	96,935	99,532	98,625
83,195	87,434	87,874	88,335	93,607	94,499	93,446	93,363	93,250
85,598	87,403	86,985	90,630	90,433	93,204	91,313	93,243	94,849
80,421	81,161	82,171	85,281	85,709	85,433	83,561	89,200	88,872
76,578	73,236	73,553	74,816	74,835	75,397	72,876	72,398	68,945
84,191	89,103	90,839	92,969	96,446	99,221	95,152	92,907	94,253
89,594	94,075	97,206	99,432	101,184	98,422	99,552	100,359	101,181
92,861	96,538	96,413	95,938	95,358	96,115	95,036	97,052	94,137
83,380	87,532	87,102	88,486	89,729	90,148	89,707	88,421	91,238
84,655	85,867	84,941	84,635	83,550	83,833	81,071	85,867	84,995
74,139	74,508	74,974	76,326	75,903	75,998	73,647	75,067	74,554
75,674	74,731	73,656	72,678	72,916	72,496	74,195	69,857	68,726
83,021	83,222	85,871	90,458	91,857	92,908	93,362	95,614	95,886
91,143	96,093	97,006	96,568	97,578	98,730	95,757	95,357	97,582
84,150	87,981	88,344	89,213	93,235	93,919	93,681	93,310	95,298
88,965	94,999	94,170	95,455	96,038	97,759	97,755	98,407	99,036
90,322	93,665	96,196	96,889	97,827	99,059	98,325	97,119	96,051
76,722	75,699	74,548	76,112	75,158	75,947	74,562	73,623	73,026
74,481	74,482	74,318	74,903	74,362	74,429	71,496	73,462	72,135
81,405	88,072	89,276	88,532	88,849	90,855	93,772	96,091	93,593
91,186	96,374	96,691	98,297	95,739	98,715	99,090	99,314	99,638
87,598	88,668	88,301	89,651	92,054	92,912	93,871	96,165	94,993
90,305	97,540	93,310	93,392	92,609	92,328	95,268	97,471	98,309
89,279	91,673	91,455	90,847	94,213	96,510	97,581	93,387	92,481
80,941	79,721	77,938	78,429	76,765	79,001	79,355	79,204	78,699
77,216	75,859	74,941	71,411	73,132	74,722	72,867	72,575	73,628
83,893	88,441	90,632	94,596	95,620	93,190	92,013	91,310	94,392
90,130	95,212	96,054	94,593	97,193	94,487	92,836	95,524	98,723
69,128	73,678	74,928	74,918	76,667	76,059	72,058	71,001	70,481
86,043	90,501	89,747	90,614	91,984	95,670	98,186	93,542	93,564
82,246	89,547	92,186	91,344	91,139	95,150	94,592	87,657	89,638
82,453	82,935	84,713	85,275	84,519	84,550	86,670	85,416	82,118
75,960	75,247	72,809	73,858	73,334	73,648	73,588	74,084	73,890
86,414	88,514	89,798	93,269	90,073	89,608	91,665	95,409	94,299
89,894	94,716	91,558	92,503	95,590	97,478	97,218	96,885	96,252
85,236	89,767	89,956	90,551	92,351	92,145	91,665	91,974	93,069
87,242	92,530	92,597	89,998	90,645	94,571	95,117	92,372	93,598
87,599	85,326	85,038	87,032	86,941	91,617	91,447	89,836	89,293
77,173	78,076	78,015	75,234	73,547	76,759	81,087	80,280	80,533
76,500	76,655	77,004	76,982	75,730	76,413	74,750	75,400	74,583

77,458	80,868	82,173	84,410	83,169	83,427	83,332	82,383	82,091
81,467	85,888	87,637	88,497	89,700	91,163	90,988	87,686	85,147
83,550	87,222	88,441	90,326	89,934	88,697	87,782	87,902	90,089
79,519	83,352	85,067	87,741	88,353	88,607	88,127	88,611	89,694
79,741	84,877	87,016	87,516	87,829	88,700	89,150	91,252	93,501
81,611	80,215	83,381	84,777	83,186	83,308	84,215	84,213	85,782
76,915	76,997	76,980	77,219	75,972	74,971	73,432	75,326	72,345
80,673	86,416	89,622	91,899	93,451	94,996	94,794	90,215	92,380
92,119	95,682	94,440	94,018	97,464	96,363	95,897	98,693	97,788
82,481	89,318	93,924	95,885	96,514	99,132	100,610	100,870	96,216
89,928	92,704	90,439	92,252	93,095	93,603	91,595	92,345	93,098
89,827	94,435	95,462	95,532	97,435	98,007	95,979	98,335	100,473
78,231	79,523	78,306	79,822	79,273	82,879	85,048	80,572	78,046
78,900	78,352	77,645	77,806	76,461	78,219	77,725	77,891	75,988
84,103	86,406	89,123	89,494	91,367	93,751	94,817	97,488	95,788
74,047	79,893	78,291	79,538	82,974	82,421	83,119	83,431	83,560
73,173	76,706	76,962	77,642	78,556	79,955	79,350	79,821	80,645
79,108	86,052	84,709	85,074	89,362	91,836	88,881	89,612	90,777
90,354	91,304	89,585	91,209	93,446	96,166	99,077	99,301	99,126
85,715	86,225	84,400	82,986	83,478	85,747	84,735	86,976	86,523
73,289	73,947	76,033	79,977	79,781	77,736	73,609	73,736	72,887
80,817	82,302	83,198	89,108	92,105	93,358	94,982	97,362	100,642
96,248	98,808	97,448	95,378	99,195	101,035	102,696	102,356	99,216
93,829	97,051	95,863	97,334	97,500	96,756	97,343	91,253	92,387
92,303	98,360	98,005	99,593	99,216	98,328	98,007	96,652	97,055
87,758	90,626	90,278	92,128	93,846	91,481	90,154	89,250	92,146
81,612	84,109	82,957	81,531	79,560	82,072	83,290	80,974	80,003
75,132	73,773	74,944	74,489	74,153	70,672	71,896	72,603	72,466
70,943	68,285	70,113	71,998	69,554	67,599	68,437	70,820	70,653
83,129	85,130	88,614	90,632	93,666	88,621	87,319	92,070	93,520
74,722	74,110	74,547	72,767	74,847	73,245	75,002	75,061	71,113
88,392	95,230	95,757	96,543	97,108	97,821	97,549	98,097	99,295
92,052	97,125	95,954	96,817	93,180	100,296	98,216	97,470	96,201
85,161	86,863	82,980	83,123	85,786	88,823	88,442	88,317	88,275
78,218	81,311	83,791	80,314	78,529	75,201	74,118	74,214	74,043
87,290	87,538	90,355	92,374	93,608	96,293	96,778	94,110	95,713
90,581	96,035	96,541	97,024	94,541	98,471	97,308	96,646	95,436
86,233	88,757	90,741	90,152	90,061	89,790	90,672	92,384	94,237
86,122	90,540	87,594	88,206	90,486	92,984	94,261	92,639	96,440
87,975	93,943	91,378	95,165	95,754	97,001	94,454	95,570	95,917
79,372	79,724	80,467	80,299	80,204	81,095	77,676	76,173	77,359
76,699	75,583	76,433	76,662	73,972	75,369	74,789	76,100	74,419
79,738	86,805	90,999	92,072	90,005	95,375	95,231	97,506	97,241
88,535	91,657	94,148	92,477	93,645	95,738	95,785	96,701	100,147
97,033	100,240	99,176	96,748	97,623	98,912	97,828	98,168	98,138
93,771	97,304	98,197	101,806	101,445	97,492	98,242	97,586	97,677
90,657	95,771	97,960	99,576	97,833	99,878	97,746	97,671	98,621

91,248	89,880	89,839	92,201	89,434	91,650	91,964	90,398	92,335
78,788	76,228	76,128	73,778	75,575	77,904	77,734	76,749	70,392
88,519	95,257	97,317	97,842	94,986	92,463	99,638	103,012	101,886
90,213	94,592	95,977	98,634	99,657	99,576	101,819	101,916	100,435
87,187	91,571	91,452	93,135	93,074	95,129	96,051	95,874	98,718
91,421	95,256	90,860	89,235	91,171	93,422	94,054	92,510	91,688
93,447	97,185	98,521	101,267	99,294	102,345	100,861	101,441	102,347
83,317	81,800	83,828	79,197	78,864	79,453	81,707	81,577	77,622
73,604	72,405	72,769	71,463	69,792	71,948	75,095	76,023	74,412
85,145	86,490	86,900	88,222	87,901	88,205	85,122	82,711	83,967
85,847	90,885	92,294	91,779	88,606	91,244	90,363	90,795	90,738
90,224	91,788	92,584	95,848	92,924	94,655	93,237	88,406	90,299
82,675	86,270	86,770	85,533	86,171	86,909	86,025	82,688	78,573
77,206	79,950	79,577	81,274	82,688	87,950	87,979	87,093	87,934
78,273	76,733	76,658	76,510	77,558	76,653	73,909	74,908	78,982
75,438	74,311	72,516	71,937	72,743	72,974	71,304	72,737	71,678
71,465	70,036	69,929	70,190	70,638	71,619	71,319	72,245	76,454
83,108	85,413	90,078	87,181	82,981	81,389	84,834	86,099	85,030
84,072	84,490	84,824	87,193	87,830	86,984	87,272	87,181	88,845
85,394	90,317	88,311	88,573	86,794	88,045	89,272	91,553	90,097
87,812	86,749	88,598	92,171	92,052	92,497	91,072	90,690	88,670
80,115	81,523	82,541	80,379	82,385	83,031	80,345	78,949	78,622
73,814	72,764	72,764	72,864	74,571	73,721	72,102	77,156	75,789
79,049	83,828	83,544	83,342	85,175	86,361	84,585	85,298	86,186
92,134	96,091	95,308	96,707	97,175	98,385	98,533	92,403	98,864
93,909	91,407	93,452	92,359	92,234	92,305	91,723	91,763	91,809
88,731	91,006	94,342	94,047	95,351	95,490	95,713	96,017	96,763
92,717	95,320	96,599	96,117	96,310	99,941	100,294	97,657	97,875
79,860	80,067	82,988	84,869	82,597	79,889	78,677	82,360	82,829
77,816	75,170	79,490	78,990	77,126	79,424	78,046	78,678	78,107
87,697	89,616	88,379	94,366	93,808	92,581	95,939	95,796	94,605
92,010	92,312	97,065	100,071	97,554	93,476	93,456	95,529	96,576
58,336	60,000	59,644	62,285	64,097	65,685	64,063	62,511	64,783
65,935	69,914	72,135	74,993	76,275	78,968	81,982	75,536	74,439
89,379	93,691	93,072	91,036	89,965	92,246	92,721	93,727	92,712
83,474	82,968	82,955	81,047	84,979	85,150	81,910	83,225	83,614
78,821	79,205	78,538	74,376	71,086	71,473	72,777	75,122	71,133
86,971	89,044	92,081	92,386	89,727	92,619	95,284	93,584	87,526
87,054	89,662	93,062	95,037	95,051	91,748	91,195	96,912	96,021
82,318	88,391	85,208	84,714	85,166	82,356	84,115	85,926	86,918
86,693	88,116	84,121	87,910	89,431	92,240	92,663	93,215	92,370
84,693	90,684	89,905	88,495	91,544	95,709	96,687	97,934	97,522
80,292	85,429	85,937	88,429	90,357	90,498	91,910	92,415	86,804
76,370	75,787	75,976	75,017	75,766	77,242	75,509	75,645	74,420
86,452	86,903	83,333	87,804	85,440	86,036	89,770	92,046	94,420
91,629	97,767	99,121	97,555	97,888	99,211	99,178	100,184	101,575
87,061	90,739	95,356	98,240	96,991	98,412	96,252	97,995	96,085

87,614	92,490	97,478	97,754	96,987	96,568	96,620	96,065	98,122
89,787	92,533	93,938	91,786	92,225	95,623	98,040	97,192	98,508
78,476	76,746	78,948	78,142	79,206	79,742	78,648	78,433	77,261
77,349	74,726	74,508	74,755	74,140	73,682	73,858	73,067	73,734
84,662	88,688	90,872	90,729	87,732	90,055	90,368	90,139	90,184
93,628	94,846	94,947	92,152	99,376	102,596	96,407	94,477	96,285
86,774	89,294	90,434	89,697	90,178	92,115	93,727	98,039	98,457
96,080	100,827	98,667	96,604	101,471	100,173	100,103	100,189	99,842
89,331	94,286	100,779	103,398	99,048	99,310	103,566	102,740	102,019
70,268	70,983	71,739	73,351	77,287	76,265	71,867	77,419	80,528
79,119	77,357	76,198	77,917	79,857	80,233	79,094	78,231	77,038
79,458	83,564	85,671	86,491	86,950	86,634	86,114	87,979	89,817
96,554	96,242	95,663	98,259	97,763	98,313	95,820	100,700	102,633
93,316	94,241	96,859	96,521	98,502	94,090	94,323	100,562	100,433
89,695	94,194	93,209	96,163	96,818	99,202	100,638	101,178	100,840
91,789	94,803	93,355	92,394	94,761	97,020	99,474	99,496	98,386
82,779	84,182	83,350	82,924	82,385	82,951	83,499	82,339	79,356
82,589	81,416	77,643	78,154	78,368	75,757	69,778	75,219	73,177
81,340	83,945	84,803	84,508	86,712	90,933	93,873	95,838	96,447
91,106	92,667	93,763	92,619	94,236	93,657	98,039	100,328	97,644
88,581	92,406	92,677	93,878	95,731	96,849	95,251	94,670	94,712
93,598	94,413	90,357	91,831	97,528	96,955	96,146	94,951	93,831
94,715	96,419	99,244	100,362	100,245	102,705	100,591	95,788	95,145
84,357	83,477	84,412	86,005	83,636	83,972	82,209	81,853	79,295
79,157	76,987	75,845	75,866	78,181	74,942	71,768	75,426	75,498
83,083	84,194	86,122	89,619	90,782	90,182	90,811	90,499	88,809
95,680	97,743	96,180	97,088	98,599	98,017	98,738	94,948	91,171
88,713	93,136	92,513	91,673	95,230	97,756	97,341	97,141	97,562
91,732	91,334	92,965	94,849	93,284	90,028	94,082	94,765	96,654
85,941	89,888	93,249	93,707	90,387	94,047	91,545	90,565	92,798
76,689	77,115	79,242	79,021	77,648	75,467	79,459	78,877	78,205
69,771	68,404	69,841	72,014	75,276	73,114	72,447	72,747	73,238
71,174	69,385	67,561	65,598	64,286	64,162	67,372	66,967	65,306
79,632	85,462	85,515	82,888	84,933	88,560	89,432	90,110	91,229
78,633	80,554	80,417	78,270	76,370	78,535	79,308	82,077	85,269
89,363	92,619	91,999	90,822	90,273	89,576	83,729	85,764	89,404
90,132	90,725	89,398	92,555	96,799	98,781	99,223	95,196	90,547
85,760	87,782	87,415	89,415	89,536	90,029	88,937	87,866	87,805
81,451	81,298	80,321	80,034	79,059	77,020	74,521	76,745	77,237
82,572	87,180	91,895	94,773	95,077	93,335	95,794	94,955	97,857
92,732	96,263	97,722	100,973	103,509	99,666	98,073	100,306	99,052
88,913	92,812	94,877	95,811	98,065	100,067	98,479	97,244	96,242
89,363	95,995	95,367	91,127	88,089	90,115	87,807	88,669	94,949
95,153	98,406	100,201	98,071	101,208	102,019	102,084	101,906	101,404
85,201	85,209	85,552	83,719	84,448	90,221	92,606	86,624	89,383
75,129	76,574	75,848	77,423	78,212	78,982	77,034	76,478	73,909
85,182	89,276	91,950	93,915	94,391	95,520	100,430	99,949	99,992

98,355	100,726	102,830	104,484	105,066	102,346	103,801	105,233	103,043
89,001	89,560	89,783	95,221	95,888	95,414	93,966	94,036	94,574
90,507	96,511	95,862	98,027	101,141	102,196	99,611	100,971	101,243
92,085	94,325	96,375	98,508	101,352	103,298	98,963	98,909	102,547
86,379	86,302	85,330	86,461	90,174	91,216	90,468	88,888	88,001
81,256	80,957	79,534	78,406	77,804	78,841	77,808	73,650	74,176
87,444	92,761	94,434	96,148	96,012	96,433	96,661	97,560	97,663
90,086	95,569	99,610	102,863	102,655	105,593	102,789	102,370	106,622
89,947	93,906	95,415	97,638	97,535	98,031	96,283	98,897	100,055
88,851	91,963	94,567	98,257	100,360	100,021	99,605	99,030	99,042
84,715	88,108	87,490	90,835	91,156	90,111	96,175	97,940	97,185
82,416	82,116	80,883	79,823	79,422	77,242	74,858	75,682	75,511
73,865	75,186	72,619	70,831	69,871	69,308	70,355	74,376	74,995
80,194	85,586	86,910	87,450	87,174	86,639	84,935	87,580	88,844
86,664	91,757	93,341	97,446	98,355	99,565	99,040	99,950	98,946
88,331	95,416	99,953	98,643	100,082	96,177	96,999	97,966	97,489
83,736	88,021	90,543	93,245	93,532	94,321	91,640	91,015	91,422
79,642	86,584	93,431	96,739	98,221	98,863	98,202	100,328	99,522
74,740	70,595	69,271	70,398	70,264	72,446	74,544	75,337	77,358
73,542	71,949	71,642	71,886	72,040	68,533	68,046	71,179	70,740
79,876	80,722	82,923	85,385	87,318	89,860	89,405	89,350	89,592
88,168	92,167	96,355	96,703	96,749	101,474	98,462	99,493	101,184
82,121	85,221	84,216	82,721	81,650	81,933	80,749	82,820	90,911
86,209	88,854	91,683	93,688	96,388	96,268	96,209	94,228	95,320
89,232	98,494	101,264	101,869	98,242	99,740	103,362	105,233	103,096
81,006	81,157	80,888	79,771	79,677	81,285	77,295	75,648	79,739
70,781	70,388	69,594	70,329	69,171	69,844	68,816	70,571	73,751
81,080	87,171	88,783	94,047	93,310	88,736	85,051	88,642	93,873
93,489	98,958	100,949	97,076	97,121	98,240	98,814	99,994	103,139
87,276	89,446	92,448	94,721	96,791	96,653	96,560	97,274	97,343
83,257	89,244	92,574	92,450	93,424	94,098	97,608	101,956	103,782
87,778	93,730	95,127	99,511	100,072	96,739	94,516	95,215	101,848
80,632	81,603	81,898	82,654	81,896	84,996	84,226	84,046	84,005
79,742	77,445	78,682	78,739	74,392	64,803	64,806	63,926	67,122
72,434	77,788	80,747	83,334	84,158	85,467	85,143	85,778	86,578
83,758	88,686	91,436	94,083	93,338	94,444	90,831	92,618	94,014
84,572	87,875	90,739	93,644	94,440	95,320	92,188	92,253	92,174
82,864	88,024	88,569	91,521	92,485	93,890	92,491	93,763	92,309
78,478	83,549	83,325	83,785	84,872	83,917	81,613	81,575	81,980
66,061	64,659	64,208	62,534	62,206	61,924	62,552	62,733	60,966
62,254	61,641	61,215	61,727	60,783	60,231	56,728	55,220	51,851

HR15	HR16	HR17	HR18	HR19	HR20	HR21	HR22	HR23
65,685	65,066	64,540	65,514	65,203	67,165	68,296	68,796	69,498
87,158	86,486	86,929	88,759	91,259	88,968	92,789	88,538	88,317
99,911	97,302	93,799	97,234	96,367	97,400	97,612	93,872	89,968
81,782	79,373	77,407	80,089	79,865	83,018	88,024	89,422	83,308
98,816	92,776	93,238	97,831	99,351	93,809	91,239	91,731	93,327
88,053	83,831	84,274	88,828	89,911	89,173	88,038	85,410	82,598
67,525	67,463	68,039	68,265	67,760	68,709	70,881	71,049	69,527
48,245	48,363	47,930	49,989	51,388	58,255	61,688	64,542	65,983
91,596	89,363	88,818	90,068	91,152	90,836	90,820	90,401	91,761
94,138	88,817	87,651	87,147	93,675	93,700	94,192	92,776	91,440
89,153	89,132	85,441	86,229	87,563	86,987	86,423	87,247	87,340
87,033	85,397	83,414	82,929	84,585	85,390	84,035	84,030	85,772
78,765	79,161	79,739	82,073	77,560	75,962	75,980	71,874	68,607
69,082	69,741	69,906	70,030	69,923	68,428	68,588	67,680	66,719
68,069	67,838	68,308	66,186	66,971	65,838	67,347	67,211	68,391
83,734	84,694	88,551	89,614	88,413	90,715	90,703	90,757	89,230
90,698	89,614	87,725	87,345	88,060	89,435	90,514	91,507	91,618
91,229	88,697	89,505	93,038	93,508	89,700	89,644	88,966	89,361
93,535	90,066	90,113	95,621	95,318	95,889	95,144	94,312	93,253
85,392	88,737	92,649	91,446	90,265	87,266	87,429	86,130	84,095
73,323	72,524	72,371	72,996	72,534	71,980	72,732	72,933	71,644
67,556	67,303	67,328	68,367	68,924	68,585	69,363	69,762	69,299
91,538	90,478	91,165	86,526	87,709	90,050	90,816	90,305	88,435
88,517	87,811	86,506	88,592	90,592	90,511	91,288	92,103	92,944
90,844	88,888	90,331	93,417	91,197	87,206	88,622	88,314	82,522
58,825	58,912	59,107	59,388	59,554	59,291	59,284	59,275	59,377
59,959	60,084	60,222	60,600	61,023	61,324	61,430	61,929	62,528
74,204	72,493	72,660	74,562	72,852	73,243	75,654	74,868	71,283
63,375	63,538	67,517	68,287	68,712	69,470	69,730	68,893	70,725
88,427	89,958	92,008	92,745	92,695	92,238	95,367	94,904	92,900
92,596	92,520	90,729	90,353	88,801	89,454	94,684	92,052	88,387
78,701	72,634	74,877	78,182	79,663	78,765	84,539	91,347	92,020
93,973	94,128	96,546	95,583	96,572	96,197	97,902	95,979	95,285
91,436	91,529	92,189	91,740	94,533	96,460	95,204	92,462	89,650
76,121	76,389	77,207	79,370	77,212	77,775	73,022	72,936	72,916
67,106	67,067	67,254	67,644	67,478	67,263	67,473	68,788	69,595
87,408	83,589	88,876	91,851	89,949	92,127	93,951	93,269	91,346
96,770	94,367	92,814	91,054	90,404	91,064	92,560	91,426	89,471
95,676	96,007	96,118	96,166	96,571	96,482	95,650	96,955	95,394
98,077	96,904	94,500	92,867	92,115	91,824	93,431	93,067	90,576
89,692	92,288	92,049	90,929	88,573	87,042	86,699	88,248	86,089
77,501	80,465	78,628	77,869	78,674	75,878	74,640	73,392	72,677

67,232	67,309	68,010	69,464	69,371	69,333	69,192	69,171	69,428
91,295	88,077	88,342	83,669	86,614	88,255	92,958	94,832	93,057
90,621	89,108	93,092	93,338	87,129	87,773	92,769	97,401	96,516
87,469	89,471	90,368	86,381	84,788	85,092	86,313	87,668	88,434
91,757	90,404	89,836	91,398	91,294	90,783	91,327	91,656	89,708
82,115	85,653	86,027	86,775	84,191	81,569	81,249	80,226	77,681
74,270	73,450	73,179	73,444	74,382	74,121	74,073	74,065	73,618
68,954	68,998	69,278	69,448	68,865	69,048	70,150	70,153	70,702
89,028	87,930	89,079	90,722	89,626	88,862	90,680	89,498	89,264
86,340	93,311	94,536	93,771	89,229	87,483	88,825	88,604	87,713
89,777	87,309	86,774	87,435	85,543	82,037	85,082	82,384	75,592
59,776	60,168	60,391	60,718	61,067	60,952	60,483	60,061	59,907
60,000	55,476	52,617	55,027	55,867	57,849	58,849	59,886	60,413
68,210	67,865	68,460	69,103	69,190	69,108	68,588	68,340	68,158
66,865	66,730	62,066	60,827	62,049	63,659	65,618	68,199	69,509
80,558	78,339	80,112	84,894	86,927	86,858	85,175	88,294	87,507
85,467	85,149	87,970	89,738	89,210	88,431	89,629	89,585	88,896
86,859	85,096	86,902	86,274	86,578	86,205	85,633	84,386	83,615
78,738	76,545	80,007	81,154	80,730	79,309	76,246	77,848	76,249
67,260	69,498	70,970	70,604	70,321	70,738	70,352	70,457	69,487
74,435	74,672	75,232	74,487	71,175	71,128	69,582	69,545	70,965
67,610	67,342	67,315	68,897	67,669	65,107	66,477	68,393	70,525
94,127	95,443	95,799	95,357	96,431	96,773	96,993	95,556	95,008
93,309	93,910	92,309	96,681	99,820	100,300	97,725	97,612	99,217
98,685	96,800	97,213	95,843	94,948	95,789	95,565	96,098	96,045
101,552	98,570	99,362	97,938	98,631	97,078	96,406	96,679	97,451
95,744	93,818	94,119	92,967	94,607	96,555	99,243	96,704	95,894
74,353	73,561	73,931	74,404	74,040	73,611	74,076	74,287	73,738
70,116	69,698	70,404	72,011	72,026	72,504	72,733	73,524	73,625
94,879	89,643	92,128	93,820	93,133	93,949	92,007	92,001	93,128
98,512	96,987	94,867	96,711	99,627	99,242	99,770	96,552	98,217
87,741	87,961	88,859	89,211	90,235	91,281	92,106	93,742	96,776
98,993	96,144	93,267	97,499	96,003	94,322	95,430	95,485	96,487
92,742	91,046	88,269	87,660	87,537	88,878	89,131	91,009	90,282
82,482	79,589	79,670	81,241	79,150	75,389	76,904	76,121	75,286
65,826	67,165	67,245	68,924	68,168	68,085	68,821	69,848	70,638
96,235	96,128	94,254	94,726	96,837	96,174	93,541	92,208	95,087
73,139	73,924	73,208	76,362	77,873	79,202	80,589	80,761	79,008
98,954	95,395	91,975	92,803	93,887	93,431	95,727	94,569	91,521
93,138	92,282	90,075	91,721	93,946	92,738	92,700	93,533	94,686
92,325	90,818	91,156	91,495	91,355	92,822	91,652	91,158	87,714
76,464	77,388	76,953	77,806	74,863	74,034	70,859	67,897	67,747
65,573	65,785	66,128	67,249	67,081	68,380	69,578	70,007	67,126
77,704	79,323	88,979	93,091	95,437	95,326	94,971	93,479	93,834
99,281	88,881	83,413	91,028	95,483	96,948	98,969	97,974	96,890
98,836	96,171	95,865	96,195	95,533	90,373	89,654	94,767	98,271
97,205	96,155	95,305	96,651	93,431	93,023	94,300	97,689	95,422

97,235	96,224	93,959	92,894	92,019	90,697	89,869	84,398	82,336
75,882	73,247	76,169	76,684	75,767	73,808	73,650	72,360	71,670
69,201	69,618	69,384	69,251	69,186	69,949	69,915	70,705	71,949
90,712	85,924	82,271	87,166	87,032	88,395	88,501	87,895	91,833
94,830	93,587	93,588	93,677	92,563	92,374	96,741	98,358	96,180
95,101	92,242	90,901	93,097	96,498	96,291	96,253	96,752	97,857
101,185	97,318	97,593	97,400	96,091	95,734	96,137	96,211	96,636
97,701	97,166	96,117	95,929	95,089	92,497	91,002	90,628	90,979
78,316	78,548	81,868	85,758	85,050	86,145	85,246	84,533	82,152
75,522	78,383	78,919	79,358	80,306	79,582	76,479	77,184	80,547
95,498	93,737	95,163	96,577	96,165	95,332	95,281	99,790	101,243
99,872	96,159	95,562	98,884	95,543	97,775	98,235	97,116	98,107
96,146	94,594	92,570	93,805	93,496	93,263	94,694	95,174	95,174
101,736	101,060	99,080	96,844	96,964	95,440	97,249	97,359	97,712
98,840	96,571	94,093	93,685	91,720	93,435	93,839	96,125	96,078
83,096	84,917	82,097	84,660	88,883	87,719	88,149	87,569	86,494
77,987	78,308	78,488	79,355	78,619	79,171	78,225	81,406	83,674
92,920	89,738	92,399	93,687	96,050	94,938	97,052	96,562	99,163
96,362	94,195	92,589	91,698	91,851	90,840	92,426	92,913	91,438
94,673	92,590	91,720	92,706	93,040	92,181	92,872	89,352	90,425
96,613	95,893	93,099	94,946	98,160	97,670	91,434	91,429	90,748
94,532	94,337	92,647	91,604	91,477	93,356	95,719	95,969	96,723
77,064	75,900	77,752	81,329	79,859	74,877	76,206	77,741	77,462
69,645	71,515	70,941	70,579	71,551	72,648	73,699	73,422	73,720
93,384	92,855	94,231	95,931	95,562	94,863	95,573	95,860	96,702
96,251	93,113	88,847	85,711	87,425	89,308	90,741	91,842	94,642
96,060	94,016	93,298	93,771	91,646	92,224	92,994	94,218	99,855
97,909	96,059	92,372	93,516	93,075	96,093	92,529	91,691	92,150
96,499	93,842	94,112	91,550	91,491	88,343	89,598	90,809	90,569
85,073	85,982	84,474	83,798	82,096	83,102	83,297	84,259	82,557
71,788	74,431	74,291	74,752	73,926	73,013	69,459	72,069	75,132
84,249	85,461	87,727	84,409	85,214	87,532	91,520	94,335	94,749
96,554	97,860	97,081	95,661	95,110	91,750	89,838	90,181	92,414
99,553	99,358	95,528	95,496	91,306	89,325	91,232	90,139	91,571
89,686	87,617	88,555	88,981	87,664	92,731	94,155	93,293	94,442
99,051	95,686	90,173	91,130	90,221	90,355	90,430	89,389	88,633
82,417	82,174	81,838	82,712	79,533	76,148	78,716	80,013	80,252
74,398	74,070	73,513	74,047	73,430	76,039	76,967	73,774	77,650
90,695	83,309	86,403	88,799	89,561	91,398	88,807	90,920	88,393
101,646	96,994	93,808	94,716	94,583	94,916	95,627	91,754	91,457
91,309	83,200	80,979	85,036	86,695	87,173	86,519	85,303	85,699
94,136	91,886	91,183	89,902	88,601	88,953	89,155	90,117	93,962
94,227	89,501	88,676	88,436	90,079	89,679	87,388	88,894	87,965
81,901	83,065	82,617	82,585	83,223	82,512	83,018	83,339	83,547
70,128	70,229	69,508	73,363	75,424	75,562	76,534	77,556	78,120
89,600	89,647	88,816	89,768	87,748	89,195	90,395	90,470	91,241
90,637	87,878	86,349	85,765	85,455	85,074	87,854	87,282	87,537

88,960	85,863	84,714	85,865	85,418	86,903	86,375	86,272	88,734
96,346	96,189	94,512	92,783	92,503	93,960	89,101	90,176	93,360
95,745	92,991	91,616	93,166	93,994	92,727	90,908	91,227	92,424
80,005	79,533	78,749	77,672	74,191	72,273	75,552	75,553	76,759
73,551	74,045	74,605	73,630	73,001	73,802	77,319	76,067	76,355
95,836	96,202	95,919	95,626	95,825	95,782	97,042	95,747	97,064
82,347	85,099	84,519	83,024	87,408	92,728	93,724	96,283	96,215
96,795	91,840	88,979	93,248	94,309	96,169	95,917	92,749	93,244
93,756	90,060	86,450	88,092	87,909	88,992	90,133	90,888	93,592
92,036	92,078	93,743	92,774	93,393	92,307	92,942	89,273	91,106
89,248	84,337	80,551	80,025	80,051	79,089	78,456	77,409	81,014
70,755	70,619	71,076	70,185	74,280	77,004	75,932	73,308	71,124
93,331	89,690	90,516	93,606	94,638	95,085	96,495	96,709	96,311
101,500	94,972	95,913	99,125	95,824	89,701	92,119	98,642	99,180
92,419	90,654	90,205	90,391	87,511	88,112	91,888	91,732	91,083
89,304	85,756	86,160	86,770	87,019	87,824	88,876	90,190	87,478
85,491	85,713	87,098	87,437	85,085	84,581	85,263	85,250	84,197
77,522	77,138	78,703	79,370	76,892	75,498	79,666	79,286	75,284
71,194	71,682	68,958	71,692	71,944	72,404	73,078	72,358	74,534
96,729	92,298	89,404	89,515	88,593	89,581	91,850	89,367	93,930
98,104	95,529	94,673	94,100	94,901	94,884	93,390	93,963	92,240
95,160	92,675	90,263	89,653	88,087	89,418	89,075	92,082	95,045
96,811	93,062	93,875	91,297	92,011	90,714	89,970	89,764	89,297
97,860	95,447	93,769	88,041	89,866	90,782	90,886	89,088	85,367
73,741	73,222	73,415	74,009	73,736	77,715	76,176	75,291	77,191
74,620	70,152	71,399	70,532	70,971	71,915	75,125	73,003	73,057
93,664	90,519	90,295	93,184	93,367	94,391	98,560	97,843	97,187
99,179	96,281	92,205	94,275	94,939	93,751	95,928	97,679	98,114
95,324	91,658	89,670	89,623	89,855	90,707	90,581	91,275	95,165
95,854	90,759	88,554	89,398	87,622	89,173	91,171	91,411	90,290
94,702	90,868	89,255	91,871	90,585	91,237	91,742	90,824	90,905
76,695	76,205	75,524	76,980	77,516	77,521	77,321	77,932	80,358
73,456	73,604	70,705	69,019	73,001	74,343	74,904	73,603	75,703
94,048	92,306	93,385	93,598	93,830	94,282	96,161	94,771	96,073
98,950	96,613	96,754	95,273	92,834	93,695	95,184	96,128	95,993
70,451	70,707	69,831	73,427	72,334	71,835	73,395	74,681	76,190
96,420	96,192	95,973	96,425	95,466	95,386	95,476	96,844	92,588
91,107	91,499	91,675	87,385	88,806	88,451	88,457	92,668	91,427
77,423	77,198	78,394	76,011	76,166	78,891	80,780	81,752	81,206
71,067	71,527	73,377	72,144	71,875	69,388	68,140	70,589	72,923
91,405	87,234	89,543	92,170	92,913	94,358	97,885	97,842	98,425
96,430	94,291	94,887	96,228	94,521	91,558	90,431	91,588	95,127
93,768	90,416	89,390	88,496	90,766	93,107	94,097	95,422	94,496
95,146	95,663	90,555	90,682	90,938	89,469	92,750	93,318	91,499
90,494	90,122	90,998	88,968	89,558	88,693	93,631	90,364	89,952
80,597	79,315	74,477	74,793	75,124	74,207	73,591	74,847	77,867
75,073	74,453	74,073	74,734	72,988	74,368	75,131	76,539	79,471

82,387	83,375	84,485	85,660	86,398	86,934	87,454	87,569	85,635
85,655	88,569	86,718	86,383	85,777	86,742	87,671	85,841	85,520
91,696	88,816	88,834	89,390	87,795	87,397	88,475	88,341	87,800
88,481	87,703	86,480	85,571	85,732	87,137	86,208	88,212	88,738
95,683	93,856	89,127	91,315	90,615	89,400	91,381	91,310	91,680
86,208	85,519	82,873	86,363	86,739	84,499	85,516	85,071	84,930
72,881	71,723	70,958	68,066	69,780	73,465	75,089	78,160	79,710
94,376	94,075	93,204	95,318	96,091	95,858	95,646	94,847	96,000
96,421	96,329	96,079	93,531	93,466	93,838	93,306	96,206	95,510
98,451	98,313	98,190	97,638	94,550	95,611	95,742	93,537	93,117
94,104	91,851	95,683	97,232	94,309	93,567	92,981	92,031	90,383
101,042	96,130	93,335	97,111	96,101	93,338	92,304	92,073	95,094
76,549	77,588	78,193	83,337	81,452	81,603	82,982	82,528	83,001
76,614	77,645	77,686	75,746	74,752	76,772	77,381	77,096	79,246
97,310	95,403	96,295	95,692	96,163	97,183	98,442	95,017	87,099
84,399	80,706	78,340	79,233	81,857	83,748	85,325	84,626	83,787
81,676	81,099	79,679	80,607	82,814	85,241	83,613	82,874	82,307
89,829	90,426	93,218	97,040	98,436	96,962	90,514	93,743	98,788
103,682	98,498	93,638	95,968	96,561	96,550	97,910	97,637	98,237
86,638	84,691	84,802	84,488	82,702	81,044	83,304	81,433	81,488
72,858	73,851	73,874	74,545	72,312	73,879	74,747	73,755	74,497
101,273	97,830	99,057	96,055	98,390	99,587	99,351	99,798	103,379
98,187	98,216	98,753	99,139	96,809	99,159	101,165	95,432	99,214
96,410	95,436	97,030	96,744	96,131	101,511	102,833	101,183	99,856
96,579	92,401	91,128	93,958	92,911	92,577	93,271	96,425	97,016
94,530	91,393	91,227	93,310	92,108	92,035	91,356	94,430	93,140
80,261	81,248	82,750	77,304	76,560	76,259	80,238	81,297	78,125
72,251	72,027	70,676	70,705	70,355	71,611	71,843	72,765	74,086
70,557	70,945	71,203	70,448	67,703	71,034	73,207	73,709	72,613
92,504	94,793	97,703	96,884	96,551	96,244	95,570	95,028	97,197
72,637	70,206	69,284	73,542	75,214	77,043	81,873	85,175	88,064
100,082	96,963	93,263	94,850	93,786	94,347	95,071	96,294	95,046
98,686	95,952	93,799	94,627	93,715	94,666	96,215	92,813	92,697
88,356	87,872	90,184	89,173	87,206	86,620	86,525	84,273	83,897
73,426	71,814	74,925	75,979	75,213	77,001	76,946	77,043	78,465
100,056	97,787	95,739	97,057	95,170	96,785	97,794	98,808	100,704
95,197	95,181	92,907	95,307	92,112	91,191	91,074	90,842	88,477
94,023	91,253	91,386	93,662	93,013	91,194	91,242	92,350	93,704
94,917	92,879	92,996	93,292	91,896	90,901	91,720	92,997	92,857
95,670	93,932	92,567	91,773	92,950	95,904	96,494	96,955	93,499
80,244	78,605	78,414	76,996	77,475	79,630	80,018	78,770	80,145
72,817	74,156	75,524	77,090	76,506	77,037	77,080	74,362	76,631
95,678	97,207	96,461	97,060	92,560	91,497	96,958	94,629	92,008
103,034	99,071	99,179	94,774	95,807	96,645	100,465	100,971	100,712
99,226	98,957	96,309	101,252	100,692	102,482	101,187	100,662	100,832
99,093	100,278	95,819	96,481	94,274	93,480	91,496	94,580	95,567
98,724	96,184	94,060	94,607	94,387	96,870	97,046	94,206	94,784

94,177	91,413	91,182	89,005	88,233	92,252	94,417	90,507	83,411
68,001	66,085	66,786	68,217	68,665	72,226	71,900	71,931	76,036
101,607	96,625	98,163	98,638	93,267	94,188	93,967	94,239	94,456
100,078	94,378	94,453	92,605	92,047	91,439	90,990	92,705	94,101
98,093	93,091	91,613	94,081	93,612	95,282	95,956	92,395	97,279
93,329	91,010	89,962	91,641	96,389	97,384	97,487	97,834	97,673
100,999	96,893	98,079	94,808	94,318	95,271	94,767	94,785	91,424
76,934	76,010	78,459	78,075	76,330	78,561	77,785	77,214	77,232
76,335	76,741	76,882	75,571	74,659	76,410	77,528	73,993	74,793
83,874	86,652	86,734	87,431	87,766	89,897	90,826	89,847	89,782
91,300	90,841	84,741	86,386	85,848	87,909	88,653	88,929	86,726
93,232	89,444	88,977	89,834	89,016	90,365	89,900	90,074	90,843
78,594	78,727	79,792	81,664	81,078	81,483	81,481	81,677	83,834
85,592	86,114	86,495	88,189	87,600	86,808	87,252	87,593	83,848
77,391	73,048	73,253	73,658	73,044	74,303	79,246	78,395	81,092
71,267	68,262	68,459	72,820	70,474	69,925	69,569	73,150	73,109
75,287	74,756	75,472	75,398	74,836	73,020	76,551	77,557	76,961
84,552	83,076	81,647	83,555	79,776	82,352	85,015	89,123	89,447
87,734	86,973	86,946	86,849	83,955	86,287	87,575	86,955	86,480
90,249	88,058	87,495	84,403	85,085	86,441	87,006	87,251	87,533
87,670	86,567	84,121	85,683	85,129	86,807	87,095	85,878	84,483
79,068	78,705	82,037	81,161	76,145	75,404	77,005	77,741	77,394
72,908	76,502	77,610	76,713	75,336	72,577	72,199	71,464	71,876
88,379	87,089	87,125	90,010	88,667	89,292	92,867	91,841	91,383
98,987	96,054	97,507	95,446	92,152	91,332	91,141	91,301	96,915
92,506	91,818	90,541	90,169	89,124	89,106	91,659	93,947	91,336
94,588	95,962	94,481	93,502	92,191	90,943	93,943	93,417	94,942
97,749	93,944	94,850	94,998	93,131	92,524	93,144	92,646	87,845
85,394	85,240	82,141	81,366	84,106	83,679	86,206	85,803	83,993
74,425	71,864	73,703	74,103	72,258	72,718	74,373	74,641	75,343
97,236	97,217	97,083	95,283	96,263	95,547	97,473	100,182	98,799
98,120	96,287	90,274	89,021	90,677	92,177	93,651	93,871	94,143
66,485	64,991	64,736	64,399	63,031	64,284	66,526	69,180	65,251
80,017	79,345	77,227	76,975	78,341	79,138	84,960	89,847	91,005
90,944	88,778	88,677	90,128	93,817	93,304	92,707	92,825	92,075
82,437	84,404	84,820	83,186	83,757	84,852	85,209	83,362	83,468
71,953	69,216	70,711	74,540	73,156	74,357	75,388	74,435	75,114
85,594	84,367	84,659	87,745	90,529	91,752	93,249	95,324	92,542
98,173	92,399	96,091	96,290	95,295	96,937	94,955	96,940	99,358
86,897	89,677	92,300	90,000	80,623	83,861	87,562	90,930	92,111
91,948	89,545	90,389	93,320	91,055	87,871	92,639	91,867	92,745
97,302	96,142	92,659	95,413	93,882	93,146	92,152	90,298	86,634
88,167	84,036	83,056	89,507	88,582	87,392	88,748	87,251	85,582
75,949	74,365	77,634	76,018	76,188	72,597	72,307	71,829	75,048
96,009	97,057	95,493	95,372	92,880	92,774	96,365	98,082	99,099
101,515	99,350	98,932	98,160	94,503	92,974	97,833	98,573	98,830
92,521	91,252	90,385	91,678	86,343	89,123	90,210	89,134	89,408

99,849	96,973	95,588	95,163	96,096	95,346	99,163	99,023	97,128
98,303	96,149	93,889	92,615	93,003	94,578	96,388	91,176	92,167
76,609	76,562	75,347	75,484	75,636	79,146	78,777	78,842	77,444
71,857	69,219	70,029	69,414	68,344	69,789	73,960	75,403	72,556
85,674	82,830	86,784	89,536	89,611	94,746	94,987	92,027	92,839
95,334	93,181	88,773	88,180	90,021	95,179	94,894	93,448	96,171
96,738	95,279	94,055	95,334	94,321	95,304	97,604	99,498	101,578
103,308	100,871	98,786	98,028	94,906	97,327	99,274	100,201	96,622
99,443	97,319	95,288	93,607	95,172	94,795	94,570	94,004	92,884
85,010	82,128	82,948	82,587	82,423	82,315	79,617	79,450	81,924
77,759	77,944	79,108	78,310	78,587	80,816	79,873	79,300	78,434
90,560	89,284	90,283	90,292	87,865	90,784	93,514	93,030	93,246
102,965	101,282	98,860	97,279	98,477	98,276	100,381	98,857	98,703
101,009	101,389	96,315	98,204	98,429	95,429	95,797	94,543	96,125
101,670	98,071	95,899	95,490	93,858	95,848	96,898	96,058	97,383
99,350	96,509	93,816	91,595	91,125	88,809	91,534	94,324	93,078
79,789	82,672	83,435	80,223	76,984	83,704	83,063	83,107	77,194
72,165	71,395	71,877	75,101	76,934	76,356	73,798	73,042	73,934
95,411	93,687	91,497	90,403	91,089	93,545	96,877	98,076	96,888
101,385	98,252	98,397	97,890	95,367	94,528	94,564	94,591	96,288
97,155	94,502	91,616	91,957	91,303	91,913	95,134	95,913	95,719
95,991	88,494	84,309	86,754	87,374	92,386	94,315	85,056	83,910
95,640	91,488	95,055	95,411	94,764	96,423	99,200	98,304	95,389
76,796	82,016	85,047	85,274	84,815	85,335	85,765	80,851	80,958
75,910	75,487	73,494	73,314	73,767	74,058	77,011	75,450	73,379
89,446	90,922	91,839	93,755	93,664	95,295	95,958	96,068	93,667
94,977	95,621	92,514	93,497	95,190	93,956	96,426	96,572	96,993
96,391	91,205	90,304	92,452	92,387	91,361	92,422	94,182	98,689
94,381	96,959	95,528	97,860	96,273	95,076	94,310	94,751	95,178
95,257	95,105	94,663	91,377	93,375	93,903	94,693	90,406	86,070
78,325	78,860	77,482	73,839	71,768	72,344	72,962	74,188	77,831
71,992	70,945	72,034	72,455	73,484	76,576	75,977	75,400	75,966
64,520	65,651	66,842	63,696	61,519	66,430	71,337	70,854	72,216
95,050	95,544	92,253	91,638	91,515	89,600	90,273	91,344	93,829
86,315	87,148	89,090	90,626	89,162	89,694	92,187	92,507	92,726
90,778	86,982	91,838	95,598	96,915	95,103	95,885	97,014	94,447
92,751	92,775	97,686	98,253	95,975	93,279	96,154	93,514	93,197
87,606	86,341	85,122	85,205	84,310	88,060	87,215	86,473	85,216
74,362	74,440	76,068	71,504	69,019	69,368	67,046	66,571	71,056
99,167	97,462	98,254	96,689	95,898	98,464	96,735	95,801	93,661
100,644	100,644	96,133	96,278	95,227	98,602	101,823	102,626	100,987
95,129	94,006	91,689	92,374	90,422	91,371	93,067	93,918	97,348
98,190	94,893	94,375	98,873	97,084	97,925	100,108	98,727	102,311
101,505	96,902	93,907	98,844	97,474	97,342	99,230	97,955	95,939
88,211	85,499	84,640	86,578	84,899	86,565	85,506	85,661	83,469
77,239	74,773	75,360	74,484	75,273	75,367	75,095	74,680	76,279
100,284	92,339	91,738	95,183	93,591	94,721	96,392	99,127	100,050

105,314	97,596	93,833	97,982	95,777	95,603	95,115	93,264	98,078
99,355	97,193	95,859	95,910	94,905	96,823	97,668	97,128	97,448
103,733	99,863	99,894	96,681	95,836	96,299	99,002	99,607	95,729
106,243	103,235	99,654	98,985	99,589	100,325	99,878	100,199	98,501
90,005	90,756	91,561	89,382	89,247	88,780	89,305	88,992	82,629
80,552	79,005	78,829	75,891	72,569	72,283	73,361	73,782	74,311
98,629	96,714	96,271	96,703	94,771	98,705	100,266	100,505	97,051
103,436	98,806	99,967	101,343	99,546	104,153	104,543	103,702	102,795
98,994	96,176	93,196	93,028	92,809	94,176	94,860	95,067	95,080
99,384	97,004	96,231	95,995	95,036	94,733	96,076	93,831	93,286
97,722	94,294	96,518	96,312	94,646	95,198	94,185	91,296	92,062
74,587	75,478	75,708	74,404	73,930	74,266	78,827	80,490	80,892
72,715	73,076	73,328	73,949	73,800	74,364	74,419	74,677	74,918
91,325	90,404	91,021	92,268	90,489	92,079	92,544	87,396	89,857
95,761	96,754	96,205	95,136	94,429	98,373	98,706	96,315	95,936
98,255	92,673	94,768	96,318	96,201	93,970	92,455	92,234	92,913
92,236	92,336	92,739	91,616	91,710	92,387	92,437	93,574	96,016
98,348	95,124	92,208	92,587	91,638	92,392	92,349	89,195	84,806
77,683	74,807	72,514	72,610	71,418	71,175	75,127	76,542	75,186
71,208	71,657	70,589	69,117	71,247	72,670	72,668	72,670	72,842
91,039	86,401	90,191	91,746	90,285	91,435	93,545	90,059	87,495
102,245	98,628	95,414	97,441	97,252	98,552	100,264	99,748	99,103
92,612	91,591	89,843	89,180	88,390	89,032	90,744	88,293	86,735
96,452	95,889	96,999	97,486	97,271	100,761	102,224	101,256	98,912
101,499	100,892	98,113	98,791	96,195	92,658	89,683	87,947	87,020
82,144	81,013	80,340	80,816	81,410	82,855	76,704	76,773	74,921
75,837	73,523	75,925	74,825	75,152	74,698	73,297	72,984	73,955
93,065	91,027	89,964	88,063	90,025	90,584	90,450	91,982	93,498
102,846	94,949	94,389	95,155	93,943	94,901	101,429	102,597	101,192
96,690	93,163	93,748	97,839	98,253	100,487	99,429	101,611	99,033
100,116	95,724	95,602	95,279	98,931	97,910	95,190	93,357	97,269
101,973	96,712	93,094	89,600	89,005	88,418	88,729	91,765	89,962
83,740	80,470	80,728	84,112	84,264	84,374	83,456	80,987	79,937
69,138	70,445	69,052	69,902	68,897	69,911	69,953	70,701	74,785
85,791	84,513	84,779	84,349	84,811	86,849	88,520	88,111	86,299
93,605	89,535	89,308	90,735	90,756	91,040	90,125	89,079	89,755
91,904	90,276	91,623	91,697	90,880	91,660	92,165	91,579	91,233
91,702	89,617	87,145	85,724	84,298	83,903	84,002	84,437	83,592
81,735	76,020	72,561	75,737	74,539	73,386	75,041	74,271	73,795
62,415	63,050	63,367	63,553	63,027	63,428	64,287	63,439	62,300
52,073	53,540	55,879	57,124	58,878	59,026	59,048	59,260	60,800

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84,853	2,037,975	4,496,569	#####
72,725	1,846,553	4,332,424	#####
77,125	1,759,379	4,325,377	#####
93,455	2,116,976	5,025,195	#####
95,056	2,248,905	5,033,179	#####
94,501	2,158,126	4,628,536	#####
90,777	2,215,149	4,523,160	#####
81,769	2,187,766	4,792,502	#####
74,391	1,802,781	4,617,451	#####
75,853	1,764,327	4,531,708	#####
96,084	2,155,085	4,806,785	#####
97,017	2,268,685	5,032,233	#####
96,355	2,187,784	5,232,098	#####
90,156	2,196,471	5,289,633	#####
88,327	2,187,983	4,980,069	#####
79,224	1,881,398	4,266,565	#####
75,928	1,789,020	4,423,337	#####
96,756	2,170,607	4,677,362	#####
95,462	2,250,656	4,592,664	#####
77,840	1,781,161	4,656,938	#####
91,419	2,213,896	4,695,046	#####
89,069	2,144,340	4,874,340	#####
77,641	1,975,610	4,544,136	#####
76,346	1,770,504	4,269,391	#####
92,571	2,156,244	4,716,175	#####
92,617	2,213,874	4,899,722	#####
92,323	2,170,894	4,878,846	#####
94,414	2,181,824	4,754,212	#####
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BIG RIVERS ELECTRIC CORPORATION
 Cost of Service Study
 Functional Assignment and Classification

12 Months Ended
 October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Plant in Service</u>							
Intangible Plant	INTPLT	PT&D	\$ 66,895	58,634	-	-	8,261
Production Plant	PPROD	F001	\$ 1,686,796,955	1,686,796,955	-	-	-
Transmission Plant	PTRAN	F002	\$ 237,659,206	-	-	-	237,659,206
Distribution Plant	PDIST	F003	\$ -	-	-	-	-
Total Production & Transmission Plant	PT&D		1,924,456,160	1,686,796,955	-	-	237,659,206
General Plant	PGP	PT&D	\$ 18,511,051	16,225,043	-	-	2,286,008
Total Plant in Service	TPIS		\$ 1,943,034,107	\$ 1,703,080,632	\$ -	-	\$ 239,953,475
<u>Construction Work in Progress (CWIP)</u>							
CWIP Production	CWIP1	PPROD	\$ 22,411,274	22,411,274	-	-	-
CWIP Transmission	CWIP2	PTRAN	\$ 7,475,859	-	-	-	7,475,859
CWIP Distribution Plant	CWIP3	PDIST	\$ -	-	-	-	-
CWIP General Plant	CWIP4	PT&D	\$ 16,915,005	14,826,100	-	-	2,088,905
Total Construction Work in Progress	TCWIP		\$ 46,802,138	\$ 37,237,374	\$ -	-	\$ 9,564,764
Total Utility Plant			\$ 1,989,836,245	\$ 1,740,318,006	\$ -	-	\$ 249,518,239

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Rate Base							
Total Utility Plant	TUP		\$ 1,989,836,245	\$ 1,740,318,006	\$ -	\$ -	\$ 249,518,239
Less: Accumulated Provision for Depreciation							
Production	ADEPREPA	PPROD	\$ 790,847,523	790,847,523	-	-	-
Transmission	ADEPRTP	PTRAN	\$ 107,564,747	-	-	-	107,564,747
Distribution	ADEPRD11	PDIST	\$ -	-	-	-	-
General & Common Plant	ADEPRD12	PT&D	\$ 6,300,770	5,522,661	-	-	778,109
Intangible, Misc. and Other Plant	ADEPRGP	PT&D	\$ -	-	-	-	-
Retirement Work In Progress	ADEPRRT	PT&D	\$ -	-	-	-	-
Total Accumulated Depreciation	TADEPR		\$ 904,713,040	\$ 796,370,184	\$ -	\$ -	\$ 108,342,855
Net Utility Plant	NTPLANT		\$ 1,085,123,206	\$ 943,947,822	\$ -	\$ -	\$ 141,175,384
Working Capital							
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP	\$ 28,114,365	13,900,247	11,969,243	-	2,244,875
Materials and Supplies	M&S	TPIS	\$ 22,777,820	19,964,891	-	-	2,812,929
Fuel Stock	PREPAY	TPIS	\$ 34,326,112	30,087,036	-	-	4,239,076
Total Working Capital	TWC		\$ 85,218,297	\$ 63,952,174	\$ 11,969,243	\$ -	\$ 9,296,880
Net Rate Base	RB		\$ 1,170,341,502	\$ 1,007,899,995	\$ 11,969,243	\$ -	\$ 150,472,264

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Operation and Maintenance Expenses</u>							
Steam Power Generation Operation Expenses							
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	\$ 4,974,566	4,974,566	-	-	-
501 FUEL	OM501	Energy	\$ 200,919,367	-	200,919,367	-	-
502 STEAM EXPENSES	OM502	PROFIX	\$ 34,453,882	34,453,882	-	-	-
505 ELECTRIC EXPENSES	OM505	PROFIX	\$ 5,730,122	5,730,122	-	-	-
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	\$ 7,451,302	7,451,302	-	-	-
507 RENTS	OM507	PROFIX	\$ -	-	-	-	-
509 ALLOWANCES	OM509	Energy	\$ 429,682	-	429,682	-	-
Total Steam Power Operation Expenses			\$ 253,958,921	\$ 52,609,872	\$ 201,349,049	\$ -	\$ -
Steam Power Generation Maintenance Expenses							
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	\$ 3,631,867	-	3,631,867	-	-
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	\$ 3,346,806	3,346,806	-	-	-
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	\$ 30,113,309	-	30,113,309	-	-
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	\$ 6,251,804	-	6,251,804	-	-
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	\$ 877,364	877,364	-	-	-
Total Steam Power Generation Maintenance Expense			\$ 44,221,151	\$ 4,224,170	\$ 39,996,981	\$ -	\$ -
Total Steam Power Generation Expense			\$ 298,180,072	\$ 56,834,042	\$ 241,346,030	\$ -	\$ -

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Operation and Maintenance Expenses (Continued)							
Other Power Generation Operation Expense							
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	\$ -	-	-	-	-
547 FUEL	OM547	Energy	\$ 706,789	-	706,789	-	-
548 GENERATION EXPENSE	OM548	PROFIX	\$ 34,608	34,608	-	-	-
549 MISC OTHER POWER GENERATION	OM549	PROFIX	\$ -	-	-	-	-
550 RENTS	OM550	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Expenses			\$ 741,396	\$ 34,608	\$ 706,789	\$ -	\$ -
Other Power Generation Maintenance Expense							
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	\$ -	-	-	-	-
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	\$ -	-	-	-	-
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	\$ 625,088	625,088	-	-	-
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Maintenance Expense			\$ 625,088	\$ 625,088	\$ -	\$ -	\$ -
Total Other Power Generation Expense			\$ 1,366,485	\$ 659,696	\$ 706,789	\$ -	\$ -
Total Station Expense			\$ 299,546,557	\$ 57,493,738	\$ 242,052,819	\$ -	\$ -

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
 October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Operation and Maintenance Expenses (Continued)							
Other Power Supply Expenses							
555 PURCHASED POWER Energy	OM555	OMPP	\$ 19,466,790	-	19,466,790	-	-
555 PURCHASED POWER Demand	OMD555	OMPPD	\$ 4,210,045	4,210,045	-	-	-
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	\$ 58,293,374	13,175,571	45,117,803	-	-
555 PURCHASED POWER OPTIONS	OMO555	OMPP	\$ -	-	-	-	-
555 BROKERAGE FEES	OMB555	OMPP	\$ -	-	-	-	-
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	\$ -	-	-	-	-
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	\$ 909,422	909,422	-	-	-
557 OTHER EXPENSES	OM557	PROFIX	\$ 20,575,465	20,575,465	-	-	-
558 DUPLICATE CHARGES	OM558	Energy	\$ -	-	-	-	-
Total Other Power Supply Expenses	TPP		\$ 103,455,096	\$ 38,870,503	\$ 64,584,593	\$ -	\$ -
Total Electric Power Generation Expenses			\$ 403,001,653	\$ 96,364,241	\$ 306,637,411	\$ -	\$ -
Transmission Expenses							
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	\$ 876,815	-	-	-	876,815
561 LOAD DISPATCHING	OM561	LBTRAN	\$ 1,454,938	-	-	-	1,454,938
562 STATION EXPENSES	OM562	PTRAN	\$ 1,163,408	-	-	-	1,163,408
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	\$ 1,090,014	-	-	-	1,090,014
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	\$ 3,065,817	-	-	-	3,065,817
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	\$ 475,381	-	-	-	475,381
567 RENTS	OM567	PTRAN	\$ 24,701	-	-	-	24,701
568 MAINTENACE SUPERVISION AND ENG	OM568	LBTRAN	\$ 647,227	-	-	-	647,227
569 STRUCTURES	OM569	PTRAN	\$ 26,913	-	-	-	26,913
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	\$ 1,936,760	-	-	-	1,936,760
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	\$ 2,876,462	-	-	-	2,876,462
572 UNDERGROUND LINES	OM572	PTRAN	\$ -	-	-	-	-
573 MISC PLANT	OM573	PTRAN	\$ 97,880	-	-	-	97,880
Total Transmission Expenses			\$ 13,736,318	\$ -	\$ -	\$ -	\$ 13,736,318
Distribution Operation Expense							
580 OPERATION SUPERVISION AND ENGI	OM580	LBDO	\$ -	-	-	-	-
581 LOAD DISPATCHING	OM581	PDIST	\$ -	-	-	-	-
582 STATION EXPENSES	OM582	PDIST	\$ -	-	-	-	-
583 OVERHEAD LINE EXPENSES	OM583	PDIST	\$ -	-	-	-	-
584 UNDERGROUND LINE EXPENSES	OM584	PDIST	\$ -	-	-	-	-
585 STREET LIGHTING EXPENSE	OM585	PDIST	\$ -	-	-	-	-
586 METER EXPENSES	OM586	PDIST	\$ -	-	-	-	-
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	PDIST	\$ -	-	-	-	-
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	PDIST	\$ -	-	-	-	-
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	\$ -	-	-	-	-
588 MISC DISTR EXP - MAPPIN	OM588x	PDIST	\$ -	-	-	-	-
589 RENTS	OM589	PDIST	\$ -	-	-	-	-
Total Distribution Operation Expense	OMDO		\$ -	\$ -	\$ -	\$ -	\$ -

BIG RIVERS ELECTRIC CORPORATION
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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Operation and Maintenance Expenses (Continued)							
Distribution Maintenance Expense							
590 MAINTENANCE SUPERVISION AND EN	OM590	LBDM	\$ -	-	-	-	-
591 STRUCTURES	OM591	PDIST	\$ -	-	-	-	-
592 MAINTENANCE OF STATION EQUIPME	OM592	PDIST	\$ -	-	-	-	-
593 MAINTENANCE OF OVERHEAD LINES	OM593	PDIST	\$ -	-	-	-	-
594 MAINTENANCE OF UNDERGROUND LIN	OM594	PDIST	\$ -	-	-	-	-
595 MAINTENANCE OF LINE TRANSFORME	OM595	PDIST	\$ -	-	-	-	-
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	PDIST	\$ -	-	-	-	-
597 MAINTENANCE OF METERS	OM597	PDIST	\$ -	-	-	-	-
598 MISCELLANEOUS DISTRIBUTION EXPENSES	OM598	PDIST	\$ -	-	-	-	-
Total Distribution Maintenance Expense	OMDM		\$ -	\$ -	\$ -	\$ -	\$ -
Total Distribution Operation and Maintenance Expenses			-	-	-	-	-
Transmission and Distribution Expenses			13,736,318	-	-	-	13,736,318
Production, Transmission and Distribution Expenses	OMSUB		\$ 416,737,971	\$ 96,364,241	\$ 306,637,411	\$ -	\$ 13,736,318
Customer Accounts Expense							
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	\$ -	-	-	-	-
902 METER READING EXPENSES	OM902	F025	\$ -	-	-	-	-
903 RECORDS AND COLLECTION	OM903	F025	\$ -	-	-	-	-
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	\$ -	-	-	-	-
905 MISC CUST ACCOUNTS	OM903	F025	\$ -	-	-	-	-
Total Customer Accounts Expense	OMCA		\$ -	\$ -	\$ -	\$ -	\$ -
Customer Service Expense							
907 SUPERVISION	OM907	TUP	\$ -	-	-	-	-
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	\$ 591,192	517,058	-	-	74,133
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	\$ -	-	-	-	-
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	\$ -	-	-	-	-
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	\$ -	-	-	-	-
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	\$ -	-	-	-	-
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	\$ -	-	-	-	-
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	\$ -	-	-	-	-
913 ADVERTISING EXPENSES	OM913	TUP	\$ 488,103	426,897	-	-	61,206
915 MDSE-JOBING-CONTRACT	OM915	TUP	\$ -	-	-	-	-
916 MISC SALES EXPENSE	OM916	TUP	\$ -	-	-	-	-
Total Customer Service Expense	OMCS		\$ 1,079,295	\$ 943,955	\$ -	\$ -	\$ 135,340
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2		417,817,266	97,308,197	306,637,411	-	13,871,658

BIG RIVERS ELECTRIC CORPORATION
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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Operation and Maintenance Expenses (Continued)</u>							
Administrative and General Expense							
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	\$ 14,315,713	6,663,061	5,595,161	-	2,057,491
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	\$ 6,915,648	3,218,798	2,702,915	-	993,935
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	\$ -	-	-	-	-
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	\$ 3,954,189	1,840,425	1,545,457	-	568,306
924 PROPERTY INSURANCE	OM924	TUP	\$ -	-	-	-	-
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	\$ 179,889	83,727	70,308	-	25,854
926 EMPLOYEE BENEFITS	OM926	LBSUB9	\$ 169,663	78,967	66,311	-	24,384
927 FRANCHISE REQUIREMENTS	OM927	TUP	\$ -	-	-	-	-
928 REGULATORY COMMISSION FEES	OM928	TUP	\$ 1,188,958	1,039,867	-	-	149,091
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	\$ -	-	-	-	-
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	\$ 1,686,131	784,788	659,008	-	242,335
931 RENTS AND LEASES	OM931	PGP	\$ 1,933	1,694	-	-	239
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	\$ 208,156	182,450	-	-	25,706
Total Administrative and General Expense	OMAG		\$ 28,620,280	\$ 13,893,778	\$ 10,639,160	\$ -	\$ 4,087,342
Total Operation and Maintenance Expenses	TOM		\$ 446,437,546	\$ 111,201,975	\$ 317,276,572	\$ -	\$ 17,959,000
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP		\$ 224,914,919	\$ 111,201,975	\$ 95,753,945	\$ -	\$ 17,959,000

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12 Months Ended
 October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses							
Steam Power Generation Operation Expenses							
500 OPERATION SUPERVISION & ENGINEERING	LB500	PROFIX	\$ 4,967,667	4,967,667	-	-	-
501 FUEL	LB501	Energy	\$ 3,889,944	-	3,889,944	-	-
502 STEAM EXPENSES	LB502	PROFIX	\$ 9,023,322	9,023,322	-	-	-
505 ELECTRIC EXPENSES	LB505	PROFIX	\$ 4,523,897	4,523,897	-	-	-
506 MISC. STEAM POWER EXPENSES	LB506	PROFIX	\$ 940,518	940,518	-	-	-
507 RENTS	LB507	PROFIX	\$ -	-	-	-	-
509 ALLOWANCES	LB509	Energy	\$ -	-	-	-	-
Total Steam Power Operation Expenses	LBSUB1		\$ 23,345,348	\$ 19,455,404	\$ 3,889,944	\$ -	\$ -
Steam Power Generation Maintenance Expenses							
510 MAINTENANCE SUPERVISION & ENGINEERING	LB510	Energy	\$ 3,623,969	-	3,623,969	-	-
511 MAINTENANCE OF STRUCTURES	LB511	PROFIX	\$ 986,831	986,831	-	-	-
512 MAINTENANCE OF BOILER PLANT	LB512	Energy	\$ 8,700,235	-	8,700,235	-	-
513 MAINTENANCE OF ELECTRIC PLANT	LB513	Energy	\$ 1,595,642	-	1,595,642	-	-
514 MAINTENANCE OF MISC STEAM PLANT	LB514	PROFIX	\$ 200,886	200,886	-	-	-
Total Steam Power Generation Maintenance Expense	LBSUB2		\$ 15,107,564	\$ 1,187,718	\$ 13,919,846	\$ -	\$ -
Total Steam Power Generation Expense			\$ 38,452,913	\$ 20,643,122	\$ 17,809,791	\$ -	\$ -

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12 Months Ended
 October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses (Continued)							
Other Power Generation Operation Expense							
546 OPERATION SUPERVISION & ENGINEERING	LB546	PROFIX	\$ -	-	-	-	-
547 FUEL	LB547	Energy	\$ -	-	-	-	-
548 GENERATION EXPENSE	LB548	PROFIX	\$ -	-	-	-	-
549 MISC OTHER POWER GENERATION	LB549	PROFIX	\$ -	-	-	-	-
550 RENTS	LB550	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Expenses	LBSUB7		\$ -	\$ -	\$ -	\$ -	\$ -
Other Power Generation Maintenance Expense							
551 MAINTENANCE SUPERVISION & ENGINEERING	LB551	PROFIX	\$ -	-	-	-	-
552 MAINTENANCE OF STRUCTURES	LB552	PROFIX	\$ -	-	-	-	-
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB553	PROFIX	\$ 89,555	89,555	-	-	-
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	LB554	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Maintenance Expense	LBSUB8		\$ 89,555	\$ 89,555	\$ -	\$ -	\$ -
Total Other Power Generation Expense			\$ 89,555	\$ 89,555	\$ -	\$ -	\$ -
Total Production Expense	LPREX		\$ 38,542,468	\$ 20,732,677	\$ 17,809,791	\$ -	\$ -

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12 Months Ended
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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses (Continued)							
Purchased Power							
555 PURCHASED POWER Energy	LB555	OMPP	\$ -	-	-	-	-
555 PURCHASED POWER Demand	LBD555	OMPPD	\$ -	-	-	-	-
555 PURCHASED POWER OPTIONS	LBO555	OMPP	\$ -	-	-	-	-
555 BROKERAGE FEES	LBB555	OMPP	\$ -	-	-	-	-
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	\$ -	-	-	-	-
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	\$ -	-	-	-	-
557 OTHER EXPENSES	LB557	PROFIX	\$ -	-	-	-	-
558 DUPLICATE CHARGES	LB558	Energy	\$ -	-	-	-	-
Total Purchased Power Labor	LBPP		\$ -	\$ -	\$ -	\$ -	\$ -
Transmission Labor Expenses							
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	\$ 835,977	-	-	-	835,977
561 LOAD DISPATCHING	LB561	PTRAN	\$ 1,304,969	-	-	-	1,304,969
562 STATION EXPENSES	LB562	PTRAN	\$ 598,382	-	-	-	598,382
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	\$ 236,393	-	-	-	236,393
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	\$ -	-	-	-	-
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	\$ 312,375	-	-	-	312,375
567 RENTS	LB567	PTRAN	\$ -	-	-	-	-
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	\$ 644,925	-	-	-	644,925
569 MAINTENACE OF STRUCTURES	LB569	PTRAN	\$ 318	-	-	-	318
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	\$ 1,433,304	-	-	-	1,433,304
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	\$ 1,067,766	-	-	-	1,067,766
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	\$ 46,439	-	-	-	46,439
Total Transmission Labor Expenses	LBTRAN		\$ 6,480,848	\$ -	\$ -	\$ -	\$ 6,480,848
Distribution Operation Labor Expense							
580 OPERATION SUPERVISION AND ENGI	LB580	F023	\$ -	-	-	-	-
581 LOAD DISPATCHING	LB581	PDIST	\$ -	-	-	-	-
582 STATION EXPENSES	LB582	PDIST	\$ -	-	-	-	-
583 OVERHEAD LINE EXPENSES	LB583	PDIST	\$ -	-	-	-	-
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	\$ -	-	-	-	-
585 STREET LIGHTING EXPENSE	LB585	PDIST	\$ -	-	-	-	-
586 METER EXPENSES	LB586	PDIST	\$ -	-	-	-	-
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	\$ -	-	-	-	-
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	\$ -	-	-	-	-
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	\$ -	-	-	-	-
589 RENTS	LB589	PDIST	\$ -	-	-	-	-
Total Distribution Operation Labor Expense	LBDO		\$ -	\$ -	\$ -	\$ -	\$ -

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses (Continued)							
Distribution Maintenance Labor Expense							
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	\$ -	-	-	-	-
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	\$ -	-	-	-	-
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	\$ -	-	-	-	-
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	\$ -	-	-	-	-
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	\$ -	-	-	-	-
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	\$ -	-	-	-	-
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	\$ -	-	-	-	-
597 MAINTENANCE OF METERS	LB597	PDIST	\$ -	-	-	-	-
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	\$ -	-	-	-	-
Total Distribution Maintenance Labor Expense	LBDM		\$ -	\$ -	\$ -	\$ -	\$ -
Total Distribution Operation and Maintenance Labor Expenses		PDIST	-	-	-	-	-
Transmission and Distribution Labor Expenses			6,480,848	-	-	-	6,480,848
Production, Transmission and Distribution Labor Expenses	LBSUB		\$ 45,023,316	\$ 20,732,677	\$ 17,809,791	\$ -	\$ 6,480,848
Customer Accounts Expense							
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	\$ -	-	-	-	-
902 METER READING EXPENSES	LB902	F025	\$ -	-	-	-	-
903 RECORDS AND COLLECTION	LB903	F025	\$ -	-	-	-	-
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	\$ -	-	-	-	-
905 MISC CUST ACCOUNTS	LB903	F025	\$ -	-	-	-	-
Total Customer Accounts Labor Expense	LBCA		\$ -	\$ -	\$ -	\$ -	\$ -
Customer Service Expense							
907 SUPERVISION	LB907	TUP	\$ -	-	-	-	-
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	\$ 544,608	476,316	-	-	68,292
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	\$ -	-	-	-	-
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	\$ -	-	-	-	-
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	\$ -	-	-	-	-
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	\$ -	-	-	-	-
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	\$ -	-	-	-	-
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	\$ -	-	-	-	-
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	\$ -	-	-	-	-
915 MDSE-JOBGING-CONTRACT	LB915	TUP	\$ -	-	-	-	-
916 MISC SALES EXPENSE	LB916	TUP	\$ -	-	-	-	-
Total Customer Service Labor Expense	LBCS		\$ 544,608	\$ 476,316	\$ -	\$ -	\$ 68,292
Sub-Total Labor Exp	LBSUB9		45,567,924	21,208,994	17,809,791	-	6,549,140

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12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Labor Expenses (Continued)</u>							
Administrative and General Expense							
920 ADMIN. & GEN. SALARIES-	LB920	LBSUB9	\$ 14,315,714	6,663,061	5,595,161	-	2,057,491
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB9	\$ -	-	-	-	-
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB922	LBSUB9	\$ -	-	-	-	-
923 OUTSIDE SERVICES EMPLOYED	LB923	LBSUB9	\$ -	-	-	-	-
924 PROPERTY INSURANCE	LB924	TUP	\$ -	-	-	-	-
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB9	\$ 27,509	12,804	10,752	-	3,954
926 EMPLOYEE BENEFITS	LB926	LBSUB9	\$ 17,136	7,976	6,698	-	2,463
928 REGULATORY COMMISSION FEES	LB928	TUP	\$ -	-	-	-	-
929 DUPLICATE CHARGES-CR	LB929	LBSUB9	\$ -	-	-	-	-
930 MISCELLANEOUS GENERAL EXPENSES	LB930	LBSUB9	\$ -	-	-	-	-
931 RENTS AND LEASES	LB931	PGP	\$ -	-	-	-	-
935 MAINTENANCE OF GENERAL PLANT	LB935	PGP	\$ 74,927	65,674	-	-	9,253
Total Administrative and General Expense	LBAG		\$ 14,435,286	\$ 6,749,515	\$ 5,612,610	\$ -	\$ 2,073,161
Total Operation and Maintenance Expenses	TLB		\$ 60,003,210	\$ 27,958,509	\$ 23,422,401	\$ -	\$ 8,622,301
Operation and Maintenance Expenses Less Purchase Power	LBLPP		\$ 60,003,210	\$ 27,958,509	\$ 23,422,401	\$ -	\$ 8,622,301

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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Other Expenses							
Depreciation Expenses							
Production	DEPRDP2	PPROD	\$ 28,815,395	28,815,395	-	-	-
Transmission	DEPRDP3	PTRAN	\$ 5,182,459	-	-	-	5,182,459
Transmission	DEPRDP4	PTRAN	\$ -	-	-	-	-
Distribution	DEPRDP5	PDIST	\$ -	-	-	-	-
General & Common Plant	DEPRDP6	PGP	\$ 238,155	208,744	-	-	29,411
Other Plant	DEPROTH	TPIS	\$ -	-	-	-	-
Total Depreciation Expense	TDEPR		\$ 34,236,009	29,024,140	-	-	5,211,869
Accretion Expense							
Production	ACRTNP	F017	\$ -	-	-	-	-
Transmission	ACRTNT	PTRAN	\$ -	-	-	-	-
Distribution	ACRTND	PDIST	\$ -	-	-	-	-
Total Accretion Expense	TACRTN		\$ -	\$ -	\$ -	\$ -	\$ -
Property Taxes & Other	PTAX	TUP	\$ (94,563)	(82,705)	-	-	(11,858)
Amortization of Investment Tax Credit	OTAX	TUP	\$ -	-	-	-	-
Other Expenses	OT	TUP	\$ (365,864)	(319,986)	-	-	(45,878)
Interest	INTLTD	TUP	\$ 47,622,710	41,650,995	-	-	5,971,715
Other Deductions	DEDUCT	TUP	\$ 109,257	95,557	-	-	13,700
Total Other Expenses	TOE		\$ 81,507,549	\$ 70,368,000	\$ -	\$ -	\$ 11,139,549
Total Cost of Service (O&M + Other Expenses)			\$ 527,945,095	\$ 181,569,975	\$ 317,276,572	\$ -	\$ 29,098,548

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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Functional Vectors							
Production Plant	F001		1.000000	1.000000	0.000000	0.000000	0.000000
Transmission Plant	F002		1.000000	0.000000	0.000000	0.000000	1.000000
Distribution Plant	F003		1.000000	0.000000	0.000000	0.000000	1.000000
Production Plant	F017		1.000000	0.000000	1.000000	0.000000	0.000000
Provar	PROVAR		1.000000	0.000000	1.000000	0.000000	0.000000
PROFIX	PROFIX		1.000000	1.000000	0.000000	0.000000	0.000000
Distribution Operation Labor	F023		-	-	-	-	-
Distribution Maintenance Labor	F024		-	-	-	-	-
Customer Accounts Expense	F025		1.000000	0.000000	0.000000	0.000000	1.000000
Customer Service Expense	F026		1.000000	0.000000	0.000000	0.000000	1.000000
Purchased Power Energy	OMPP		1.000000	0.000000	1.000000	0.000000	0.000000
Purchased Power Demand	OMPPD		1.000000	1.000000	0.000000	0.000000	0.000000
Purchased Power BREC Share of HMP&L Station Two	OMPPH		58,293,374	13,175,571	45,117,803	0.000000	0.000000
Production Energy	Energy		1.000000	0.000000	1.000000	0.000000	0.000000
Internally Generated Functional Vectors							
Total Prod, Trans, and Dist Plant		PT&D	1.000000	0.876506	-	-	0.123494
Total Transmission Plant		PTRAN	1.000000	-	-	-	1.000000
Operation and Maintenance Expenses Less Purchase Power		OMLPP	1.000000	0.494418	0.425734	-	0.079848
Total Plant in Service		TPIS	1.000000	0.876506	-	-	0.123494
Total Operation and Maintenance Expenses (Labor)		TLB	1.000000	0.465950	0.390352	-	0.143697
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service		OMSUB2	1.000000	0.232897	0.733903	-	0.033200
Total Steam Power Operation Expenses (Labor)		LBSUB1	1.000000	0.833374	0.166626	-	-
Total Steam Power Generation Maintenance Expense (Labor)		LBSUB2	1.000000	0.078617	0.921383	-	-
Total Transmission Labor Expenses		LBTRAN	1.000000	-	-	-	1.000000
Sub-Total Labor Exp		LBSUB7	1.000000	0.465437	0.390841	-	0.143723
Total General Plant		PGP	1.000000	0.876506	-	-	0.123494
Total Production Plant		PPROD	1.000000	1.000000	-	-	-
Total Intangible Plant		INTPLT	1.000000	0.876506	-	-	0.123494

BIG RIVERS ELECTRIC CORPORATION
 Cost of Service Study
 Rate Schedule Allocation
 12 Months Ended
 October 2010

Average Excess Demand - Smelter TIER Adjustment Revenues at \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Cost of Service Summary – Unadjusted							
Operating Revenues							
Sales to Members		REVUC	R01	\$ 110,934,700	\$ 39,110,620	\$ 282,406,135	\$ 432,451,455
Off System Sales Revenue			OSSALL	\$ 12,744,879	\$ 4,569,868	\$ 59,229,055	\$ 76,543,801
Income from Leased Property Net			OTHREV RBPLT	\$ 51,608	\$ 12,924	\$ 85,141	\$ 149,673
Other Operating Revenue & Income			OTHREV RBPLT	\$ 4,750,980	\$ 1,189,792	\$ 7,837,973	\$ 13,778,745
Total Operating Revenues			TOR	\$ 128,482,167	\$ 44,883,204	\$ 349,558,304	\$ 522,923,675
Operating Expenses							
Operation and Maintenance Expenses				\$ 121,960,887	\$ 40,042,146	\$ 284,434,513	\$ 446,437,546
Depreciation and Amortization Expenses				\$ 11,810,735	\$ 2,954,142	\$ 19,471,132	\$ 34,236,009
Property and Other Taxes			NPT	\$ (32,733)	\$ (8,164)	\$ (53,666)	\$ (94,563)
Total Operating Expenses			TOE	\$ 133,738,889	\$ 42,988,124	\$ 303,851,979	\$ 480,578,992
Utility Operating Margin				\$ (5,256,723)	\$ 1,895,081	\$ 45,706,325	\$ 42,344,683
Non-Operating Items							
Interest Income			RBPLT	\$ -	\$ -	\$ -	\$ -
Other Non-Operating Income			RBPLT	\$ -	\$ -	\$ -	\$ -
Other Credits			RBPLT	\$ -	\$ -	\$ -	\$ -
Interest on Long Term Debt				\$ -	\$ -	\$ -	\$ -
Other Interest Expense			RBPLT	\$ -	\$ -	\$ -	\$ -
Other Deductions			RBPLT	\$ -	\$ -	\$ -	\$ -
Total Non-Operating Items				\$ -	\$ -	\$ -	\$ -
Net Utility Operating Margin			TOM	\$ (5,256,723)	\$ 1,895,081	\$ 45,706,325	\$ 42,344,683
Net Cost Rate Base				\$ 403,539,604	\$ 101,058,766	\$ 665,743,132	\$ 1,170,341,502

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Rate Schedule Allocation
12 Months Ended
October 2010

Average Excess Demand - Smelter TIER Adjustment Revenues at \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Cost of Service Summary -- Pro-Forma							
Operating Revenues							
Total Operating Revenue				\$ 128,482,167	\$ 44,883,204	\$ 349,558,304	\$ 522,923,675
Pro-Forma Adjustments:							
To annualize revenue for new industrial customer	2.01			\$ -	\$ 149,752	\$ -	\$ 149,752
To adjust mismatch in fuel cost recovery	2.02	FACREV		\$ (25,166,503)	\$ (9,525,471)	\$ (73,123,203)	\$ (107,815,177)
To eliminate Environmental Surcharge revenues	2.03	ESREV		\$ (5,315,462)	\$ (2,025,233)	\$ (15,493,538)	\$ (22,834,232)
To reflect temperature normalized sales volumes	2.04		EnergyR	\$ (421,610)	\$ -	\$ -	\$ (421,610)
To eliminate Non-FAC PPA revenues	2.05	NFPR		\$ 2,757,108	\$ 1,045,800	\$ 7,785,109	\$ 11,588,017
To eliminate WKEC Lease Expenses	2.19		RBPLT	\$ (51,608)	\$ (12,924)	\$ (85,141)	\$ (149,673)
To eliminate RRI Domtar Cogen Backup revenues	2.09			\$ -	\$ (1,115,159)	\$ -	\$ (1,115,159)
To adjust for Smelter TIER Adjustment Charge	2.22			\$ -	\$ -	\$ -	\$ -
Total Pro-Forma Operating Revenue				\$ 100,284,092	\$ 33,399,969	\$ 268,641,532	\$ 402,325,592

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Rate Schedule Allocation
12 Months Ended
October 2010

Average Excess Demand - Smelter TIER Adjustment Revenues at \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Cost of Service Summary – Pro-Forma							
Operating Expenses							
Operation and Maintenance Expenses				\$ 121,960,887	\$ 40,042,146	\$ 284,434,513	\$ 446,437,546
Depreciation and Amortization Expenses				\$ 11,810,735	\$ 2,954,142	\$ 19,471,132	\$ 34,236,009
Property and Other Taxes			NPT	\$ (32,733)	\$ (8,164)	\$ (53,666)	\$ (94,563)
Adjustments to Operating Expenses:							
To annualize expenses for new industrial customer	2.01			\$ -	\$ 110,607	\$ -	\$ 110,607
To adjust mismatch in fuel cost recovery	2.02		FACREV	\$ (25,685,949)	\$ (9,722,081)	\$ (74,632,493)	\$ (110,040,523)
To eliminate Environmental Surcharge expenses	2.03		ESREV	\$ (5,462,944)	\$ (2,081,425)	\$ (15,923,422)	\$ (23,467,791)
To reflect weather normalized sales volumes	2.04		EnergyR	\$ (295,293)	\$ -	\$ -	\$ (295,293)
To eliminate Non-FAC PPA expenses	2.05		NFPR	\$ 2,858,740	\$ 1,084,350	\$ 8,072,083	\$ 12,015,173
To reflect annualized depreciation expenses	2.06		PLT	\$ 2,164,890	\$ 539,845	\$ 3,547,916	\$ 6,252,651
To reflect increases in labor and labor-related costs	2.07		LBPLT	\$ 186,980	\$ 54,413	\$ 383,501	\$ 624,894
To reflect current interest on construction (CWIP)	2.08		PLT	\$ 178,577	\$ 44,531	\$ 292,659	\$ 515,767
To eliminate RRI Domtar Cogen Backup expenses	2.09			\$ -	\$ (2,086,416)	\$ -	\$ (2,086,416)
To reflect levelized production expenses	2.10		CP	\$ 1,990,470	\$ 489,975	\$ 3,180,233	\$ 5,660,678
To reflect levelized production expenses	2.11		CP	\$ 958,885	\$ 236,040	\$ 1,532,040	\$ 2,726,965
To reflect going forward Information Technology support services	2.12		RBPLT	\$ 100,750	\$ 25,231	\$ 166,213	\$ 292,194
To reflect amortization of rate case expenses	2.13		RBPLT	\$ 97,138	\$ 24,326	\$ 160,254	\$ 281,719
To reflect MISO related expenses	2.14		12CPTR	\$ 1,667,501	\$ 459,102	\$ 3,288,398	\$ 5,415,000
To annualize interest on long-term debt	2.15		RBPLT	\$ 24,277	\$ 6,080	\$ 40,051	\$ 70,408
To reflect leased property income (Soaper Building Rent)	2.16		LBPLT	\$ (38,410)	\$ (11,178)	\$ (78,780)	\$ (128,368)
To adjust for costs related to LEM Dispatch	2.17		CP	\$ (329,413)	\$ (81,089)	\$ (526,313)	\$ (936,815)
To adjust for costs related to APM	2.18		CP	\$ 72,116	\$ 17,752	\$ 115,222	\$ 205,090
To reflect going forward level of Outside Services	2.25		EnergyNS	\$ (725,000)	\$ (275,000)	\$ -	\$ (1,000,000)
To eliminate costs for SFPC membership	2.20		RBPLT	\$ (62,332)	\$ (15,610)	\$ (102,833)	\$ (180,775)
To adjust for MISO Case-related expenses	2.21		12CPTR	\$ (237,459)	\$ (65,378)	\$ (468,281)	\$ (771,118)
To reflect commitment to Energy Efficiency Programs	2.26		EnergyNS	\$ 725,000	\$ 275,000	\$ -	\$ 1,000,000
To eliminate promo advertising, lobbying, donation and econ dev	2.23		R01	\$ (130,114)	\$ (45,872)	\$ (331,230)	\$ (507,216)
To reflect going forward level of income taxes	2.24		NTPLT	\$ 63,337	\$ 15,805	\$ 103,942	\$ 183,084
Total Expense Adjustments				\$ (21,878,252)	\$ (11,000,991)	\$ (71,180,840)	\$ (104,060,084)
Total Operating Expenses		TOE		\$ 111,860,637	\$ 31,987,132	\$ 232,671,139	\$ 376,518,908
Utility Operating Margins – Pro-Forma				\$ (11,576,545)	\$ 1,412,836	\$ 35,970,393	\$ 25,806,684
Non-Operating Items				\$ -	\$ -	\$ -	\$ -
Total Non-Operating Items				\$ -	\$ -	\$ -	\$ -
Net Utility Operating Margin				\$ (11,576,545)	\$ 1,412,836	\$ 35,970,393	\$ 25,806,684
Net Cost Rate Base				\$ 403,539,604	\$ 101,058,766	\$ 665,743,132	\$ 1,170,341,502
Return on Rate Base – Utility Operating Margin Divided by Rate Base				-2.87%	1.40%	5.40%	2.21%

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Rate Schedule Allocation
12 Months Ended
October 2010

Average Excess Demand - Smelter TIER Adjustment Revenues at \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Subsidies Paid and Received at Present Rates							
(subsidies received shown as positive value)							
Rate Base				\$ 403,539,604	\$ 101,058,766	\$ 665,743,132	\$ 1,170,341,502
Operating Margins (present rates)				\$ (11,576,545)	\$ 1,412,836	\$ 35,970,393	\$ 25,806,684
Operating Margins at Equal Rate of Return	ROR	2.21%		\$ 8,898,274	\$ 2,228,402	\$ 14,680,008	\$ 25,806,684
Subsidies Paid and Received				\$ 20,474,819	\$ 815,566	\$ (21,290,385)	\$ (0)

Big Rivers Electric Corporation
 Summary of Cost of Service Study
 For the 12 Months Ended October 2010

Rate of Return Summary

Unadjusted

Rate Schedule		Utility Operating Margins		Net Cost Rate Base	Rate of Return
Total Rural	\$	(11,576,545)	\$	403,539,604	-2.87%
Total Large Industrial		1,412,836		101,058,766	1.40%
Total Smelter		35,970,393		665,743,132	5.40%
Total	\$	25,806,684	\$	1,170,341,502	2.21%

Adjusted for Proposed Rate Increase

Rate Schedule		Utility Operating Margins		Net Cost Rate Base	Rate of Return
Total Rural	\$	2,595,458	\$	403,539,604	0.64%
Total Large Industrial		4,641,403		101,058,766	4.59%
Total Smelter		58,523,789		665,743,132	8.79%
Total	\$	65,760,649	\$	1,170,341,502	5.62%

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
<u>Plant in Service</u>								
Intangible Plant	INTPLT	PT&D	\$ 66,895					
Production Plant	PPROD	F001	\$ 1,686,796,955					
Transmission Plant	PTRAN	F002	\$ 237,659,206					
Distribution Plant	PDIST	F003	\$ -					
Total Production & Transmission Plant	PT&D		1,924,456,160					
General Plant	PGP	PT&D	\$ 18,511,051					
Total Plant in Service	TPIS		\$ 1,943,034,107					
<u>Construction Work in Progress (CWIP)</u>								
CWIP Production	CWIP1	PPROD	\$ 22,411,274					
CWIP Transmission	CWIP2	PTRAN	\$ 7,475,859					
CWIP Distribution Plant	CWIP3	PDIST	\$ -					
CWIP General Plant	CWIP4	PT&D	\$ 16,915,005					
Total Construction Work in Progress	TCWIP		\$ 46,802,138					
Total Utility Plant			\$ 1,989,836,245					
<u>Rate Base</u>								
Total Utility Plant	TUP		\$ 1,989,836,245					
<u>Less: Accumulated Provision for Depreciation</u>								
Production	ADEPREPA	PPROD	\$ 790,847,523					
Transmission	ADEPRTP	PTRAN	\$ 107,564,747					
Distribution	ADEPRD11	PDIST	\$ -					
General & Common Plant	ADEPRD12	PT&D	\$ 6,300,770					
Intangible, Misc, and Other Plant	ADEPRGP	PT&D	\$ -					
Retirement Work In Progress	ADEPRRT	PT&D	\$ -					
Total Accumulated Depreciation	TADEPR		\$ 904,713,040					
Net Utility Plant	NTPLANT		\$ 1,085,123,206					
<u>Working Capital</u>								
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP	\$ 28,114,365					
Materials and Supplies	M&S	TPIS	\$ 22,777,820	20327197.9	85340.04	-68898.4	208485.44	-95121.11
Fuel Stock	PREPAY	TPIS	\$ 34,326,112	39158400.85	-1328756.9	-4130766.79	-359777.13	1918732.52
Total Working Capital	TWC		\$ 85,218,297					
Net Rate Base	RB		\$ 1,170,341,502					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
<u>Plant in Service</u>								
Intangible Plant	INTPLT	PT&D						
Production Plant	PPROD	F001						
Transmission Plant	PTRAN	F002						
Distribution Plant	PDIST	F003						
Total Production & Transmission Plant	PT&D							
General Plant	PGP	PT&D						
Total Plant in Service	TPIS							
<u>Construction Work in Progress (CWIP)</u>								
CWIP Production	CWIP1	PPROD						
CWIP Transmission	CWIP2	PTRAN						
CWIP Distribution Plant	CWIP3	PDIST						
CWIP General Plant	CWIP4	PT&D						
Total Construction Work in Progress	TCWIP							
Total Utility Plant								
<u>Rate Base</u>								
Total Utility Plant	TUP							
<u>Less: Accumulated Provision for Depreciation</u>								
Production	ADEPREPA	PPROD						
Transmission	ADEPRTP	PTRAN						
Distribution	ADEPRD11	PDIST						
General & Common Plant	ADEPRD12	PT&D						
Intangible, Misc. and Other Plant	ADEPRGP	PT&D						
Retirement Work In Progress	ADEPRRT	PT&D						
Total Accumulated Depreciation	TADEPR							
Net Utility Plant	NTPLANT							
<u>Working Capital</u>								
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP						
Materials and Supplies	M&S	TPIS	-220183.19	207004.7	357212.07	240129.05	-144241.07	2889566.56
Fuel Stock	PREPAY	TPIS	2552249.61	867432.81	-287963.1	-3463026.24	-2018344.81	-578882.38
Total Working Capital	TWC							
Net Rate Base	RB							

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
<u>Plant in Service</u>			
Intangible Plant	INTPLT	PT&D	
Production Plant	PPROD	F001	
Transmission Plant	PTRAN	F002	
Distribution Plant	PDIST	F003	
Total Production & Transmission Plant	PT&D		
General Plant	PGP	PT&D	
Total Plant in Service	TPIS		
<u>Construction Work in Progress (CWIP)</u>			
CWIP Production	CWIP1	PPROD	
CWIP Transmission	CWIP2	PTRAN	
CWIP Distribution Plant	CWIP3	PDIST	
CWIP General Plant	CWIP4	PT&D	
Total Construction Work in Progress	TCWIP		
Total Utility Plant			
<u>Rate Base</u>			
Total Utility Plant	TUP		
<u>Less: Accumulated Provision for Depreciation</u>			
Production	ADEPREPA	PPROD	
Transmission	ADEPRTP	PTRAN	
Distribution	ADEPRD11	PDIST	
General & Common Plant	ADEPRD12	PT&D	
Intangible, Misc. and Other Plant	ADEPRGP	PT&D	
Retirement Work In Progress	ADEPRRT	PT&D	
Total Accumulated Depreciation	TADEPR		
<u>Net Utility Plant</u>	NTPLANT		
<u>Working Capital</u>			
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP	
Materials and Supplies	M&S	TPIS	-1008672.24
Fuel Stock	PREPAY	TPIS	1996813.82
Total Working Capital	TWC		
Net Rate Base	RB		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Operation and Maintenance Expenses								
Steam Power Generation Operation Expenses								
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	\$ 4,974,566	342962.62	1034901.09	358703.86	318491.34	384828.47
501 FUEL	OM501	Energy	\$ 200,919,367	11957675.62	16736745.89	19103323.18	17630280.19	17173097.35
502 STEAM EXPENSES	OM502	PROFIX	\$ 34,453,882	2424633.22	2490999.61	2647322.04	2676616.85	2911578.89
505 ELECTRIC EXPENSES	OM505	PROFIX	\$ 5,730,122	399281.19	656713.94	477935.99	489102.92	443771.24
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	\$ 7,451,302	837237.41	458663.32	531778.12	516078.68	646116.36
507 RENTS	OM507	PROFIX	\$ -		0	0	0	0
509 ALLOWANCES	OM509	Energy	\$ 429,682		0	0	55382.46	42291.31
Total Steam Power Operation Expenses			\$ 253,958,921	\$ 7,775	\$ 146,296	\$ 7,154	\$ 15,852	\$ 21,245
Steam Power Generation Maintenance Expenses								
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	\$ 3,631,867	301562.96	282674.01	282136.07	286174.73	324812.85
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	\$ 3,346,806	-2396.3	561809.41	164027.98	219884.17	122851.74
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	\$ 30,113,309	2665049.9	2707987.08	1617573	1413359.02	2039706.29
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	\$ 6,251,804	2443905.77	804364.44	-26124.91	190619.56	167015.92
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	\$ 877,364	136355.09	154030.5	71461.85	48046.95	35868.33
Total Steam Power Generation Maintenance Expense			\$ 44,221,151	\$ 3,659	\$ 7,366	\$ 1,455	\$ 6,057	\$ 9,772
Total Steam Power Generation Expense			\$ 298,180,072					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Operation and Maintenance Expenses								
Steam Power Generation Operation Expenses								
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	338223.38	414283.22	372420.21	359404.38	369945.71	334708.35
501 FUEL	OM501	Energy	15868543.13	15412621.99	16949864.35	18643264.65	19588180.27	17004762.52
502 STEAM EXPENSES	OM502	PROFIX	2801318.34	3017168.8	3110448.48	3022221.22	3095094.21	3132173.1
505 ELECTRIC EXPENSES	OM505	PROFIX	430459.27	473960.9	440316.02	456264.08	479912.75	476352.39
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	557984.26	577686.56	640171.09	585642.46	806920.28	725866.29
507 RENTS	OM507	PROFIX	0	0	0	0	0	0
509 ALLOWANCES	OM509	Energy	33437.63	31618.94	46952.89	62169.21	49573.1	28256.05
Total Steam Power Operation Expenses			\$ 6,070	\$ 8,052	\$ 5,213	\$ 267,644	\$ 167,124	\$ 44,089
Steam Power Generation Maintenance Expenses								
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	297530.92	289425	297802.77	281476.85	309430.59	294029.27
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	153063.03	309779.07	306987.02	458108.12	372678.29	488354.6
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	1740181.45	2535024.61	2164789.64	2054585.86	2034329.79	2855272.84
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	313812.24	389518.49	251988.71	302199.64	422000.23	534239.62
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	61896.28	58285.06	85932.24	51800.09	89344.85	66090.33
Total Steam Power Generation Maintenance Expense			\$ (325)	\$ 4,943	\$ 216,501	\$ 175,754	\$ 65,241	\$ 96,186
Total Steam Power Generation Expense								

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
<u>Operation and Maintenance Expenses</u>			
Steam Power Generation Operation Expenses			
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	345693.85
501 FUEL	OM501	Energy	14851007.4
502 STEAM EXPENSES	OM502	PROFIX	3124307.14
505 ELECTRIC EXPENSES	OM505	PROFIX	506051.44
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	567156.95
507 RENTS	OM507	PROFIX	0
509 ALLOWANCES	OM509	Energy	80000.79
Total Steam Power Operation Expenses			\$ 44,882
Steam Power Generation Maintenance Expenses			
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	384811.34
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	191658.45
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	6285449.98
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	458264.77
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	18252.47
Total Steam Power Generation Maintenance Expense			\$ 38,478
Total Steam Power Generation Expense			

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
<u>Operation and Maintenance Expenses (Continued)</u>								
Other Power Generation Operation Expense								
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	\$ -	0	0	0	0	0
547 FUEL	OM547	Energy	\$ 706,789	7379.85	135814.53	4779.27	13479.11	18872.46
548 GENERATION EXPENSE	OM548	PROFIX	\$ 34,608	394.54	10481.32	2375	2373	2373
549 MISC OTHER POWER GENERATION	OM549	PROFIX	\$ -	0	0	0	0	0
550 RENTS	OM550	PROFIX	\$ -	0	0	0	0	0
Total Other Power Generation Expenses			\$ 741,396	\$ (1)	\$ (0)	\$ 0	\$ 1	\$ 0
Other Power Generation Maintenance Expense								
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	\$ -	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	\$ -	0	0	0	0	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	\$ 625,088	3658.66	7365.41	1454.85	6056.77	9772.16
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	\$ -	0	0	0	0	0
Total Other Power Generation Maintenance Expense			\$ 625,088	\$ 0	\$ (0)	\$ (0)	\$ 0	\$ 0
Total Other Power Generation Expense			\$ 1,366,485					
Total Station Expense			\$ 299,546,557					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Operation and Maintenance Expenses (Continued)								
Other Power Generation Operation Expense								
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	0	0	0	0	0	0
547 FUEL	OM547	Energy	3696.82	5679.30	2839.60	265271.41	164750.42	41716.70
548 GENERATION EXPENSE	OM548	PROFIX	2373	2373.00	2373.00	2373.00	2373.00	2373.00
549 MISC OTHER POWER GENERATION	OM549	PROFIX	0	0	0	0	0	0
550 RENTS	OM550	PROFIX	0	0	0	0	0	0
Total Other Power Generation Expenses			\$ (0)	\$ 1	\$ (0)	\$ 0	\$ (0)	\$ 0
Other Power Generation Maintenance Expense								
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	0	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	0	0	0	0	0	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	-322.62	4943.09	216501.24	175754.02	65240.65	96186.42
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	0	0	0	0	0	0
Total Other Power Generation Maintenance Expense			\$ 2	\$ 0	\$ 1	\$ (0)	\$ (1)	\$ 0
Total Other Power Generation Expense								
Total Station Expense								

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Operation and Maintenance Expenses (Continued)			
Other Power Generation Operation Expense			
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	0
547 FUEL	OM547	Energy	42509.14
548 GENERATION EXPENSE	OM548	PROFIX	2373.00
549 MISC OTHER POWER GENERATION	OM549	PROFIX	0
550 RENTS	OM550	PROFIX	0
Total Other Power Generation Expenses			\$ (0)
Other Power Generation Maintenance Expense			
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	0
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	38477.63
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	0
Total Other Power Generation Maintenance Expense			\$ (0)
Total Other Power Generation Expense			
Total Station Expense			

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Operation and Maintenance Expenses (Continued)								
Other Power Supply Expenses								
555 PURCHASED POWER Energy	OM555	OMPP	\$ 19,466,790	3,827,952.61	2,536,760.36	1,913,169.62	941,370.11	911,294.71
555 PURCHASED POWER Demand	OMD555	OMPPD	\$ 4,210,045	350,837.07	350,837.07	350,837.07	350,837.07	350,837.07
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	\$ 58,293,374	4,582,937.26	5,054,161.64	4,549,698.12	4,432,913.73	4,763,164.98
555 PURCHASED POWER OPTIONS	OMO555	OMPP	\$ -	0	0	0	0	0
555 BROKERAGE FEES	OMB555	OMPP	\$ -	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	\$ -	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	\$ 909,422	143177.05	161775.92	84110.82	66492.87	77558.07
557 OTHER EXPENSES	OM557	PROFIX	\$ 20,575,465	2479520.29	2210820.92	1519858.99	1381956.22	1577347.72
558 DUPLICATE CHARGES	OM558	Energy	\$ -	0	0	0	0	0
Total Other Power Supply Expenses	TPP		\$ 103,455,096	11,384,424.28	10,314,355.91	8,417,674.62	7,173,570.00	7,680,202.55
Total Electric Power Generation Expenses			\$ 403,001,653					
Transmission Expenses								
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	\$ 876,815	159722.72	99111.49	64131.05	56493.74	71626.61
561 LOAD DISPATCHING	OM561	LBTRAN	\$ 1,454,938	245368.38	141741.21	113777.21	98967.65	113022.44
562 STATION EXPENSES	OM562	PTRAN	\$ 1,163,408	138650.41	111166.28	70289.35	78900.11	96317.14
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	\$ 1,090,014	116902.84	72507.66	91764.75	90248.86	92136.75
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	\$ 3,065,817	227372.33	270804.44	222495.76	313990.87	298157.74
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	\$ 475,381	82941.08	54676.78	40839.08	35322.18	39484.82
567 RENTS	OM567	PTRAN	\$ 24,701	2058.43	2058.43	2058.43	2058.43	2058.43
568 MAINTENACE SUPERVISION AND ENG	OM568	LBTRAN	\$ 647,227	120702.88	66051.02	48367.7	40149.83	53439.26
569 STRUCTURES	OM569	PTRAN	\$ 26,913	36.88	6259.34	0	1874.02	59.12
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	\$ 1,936,760	272171.89	208826.01	135405.37	165513.32	155839.56
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	\$ 2,876,462	318695.62	624358.63	20316.93	128651.35	134146
572 UNDERGROUND LINES	OM572	PTRAN	\$ -	0	0	0	0	0
573 MISC PLANT	OM573	PTRAN	\$ 97,880	8341.27	4665	3732.37	5821.94	34823.78
Total Transmission Expenses			\$ 13,736,318	1,692,964.73	1,662,226.29	813,178.00	1,017,992.30	1,091,111.65

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Operation and Maintenance Expenses (Continued)								
Other Power Supply Expenses								
555 PURCHASED POWER Energy	OM555	OMPP	1,360,105.55	2,595,157.16	1,414,751.54	1,276,714.40	516,721.89	613,253.53
555 PURCHASED POWER Demand	OMD555	OMPPD	350,837.07	350,837.07	350,837.07	350,837.07	350,837.07	350,837.07
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	5,098,546.01	4,460,755.81	4,842,232.95	5,325,056.85	5,088,921.31	4,972,622.48
555 PURCHASED POWER OPTIONS	OMO555	OMPP	0	0	0	0	0	0
555 BROKERAGE FEES	OMB555	OMPP	0	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	0	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	0	92094.61	73384.96	71377.18	39951.63	51309.82
557 OTHER EXPENSES	OM557	PROFIX	1535653.17	1420108.84	1438109.81	1546376.13	1542523.95	2323941.19
558 DUPLICATE CHARGES	OM558	Energy	0	0	0	0	0	0
Total Other Power Supply Expenses	TPP		8,345,141.80	8,918,953.49	8,119,316.33	8,570,361.63	7,538,955.85	8,311,964.09
Total Electric Power Generation Expenses								
Transmission Expenses								
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	59387.59	61734.83	72275.43	57830.16	52970.2	70253.05
561 LOAD DISPATCHING	OM561	LBTRAN	89896.48	94173.59	104627.56	94297.49	86936.32	135835
562 STATION EXPENSES	OM562	PTRAN	84122.23	90931.03	103923.43	86043.52	116294.21	83898.29
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	87522.07	87158.79	89203.39	89187.21	86736.29	88209.66
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	229091.63	251486.95	238169.64	253067.81	259149.57	237980.88
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	28982.15	30160.95	44581.15	19944.19	35290.89	32930.62
567 RENTS	OM567	PTRAN	2058.43	2058.43	2058.43	2058.43	2058.43	2058.43
568 MAINTENACE SUPERVISION AND ENG	OM568	LBTRAN	44241.45	45590.11	51110.87	42324.47	40557.13	55824.53
569 STRUCTURES	OM569	PTRAN	80.04	577.95	1084.71	2771.42	1003.78	1896.87
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	124235.3	158259.64	153920.85	137834.03	134856.99	175088.1
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	140543.65	122631.69	245673.12	136904.15	282898.22	547382.49
572 UNDERGROUND LINES	OM572	PTRAN	0	0	0	0	0	0
573 MISC PLANT	OM573	PTRAN	4923.69	6697.42	5370.15	3919.44	6630.08	5359.76
Total Transmission Expenses			895,084.71	951,461.38	1,111,998.73	926,182.32	1,105,382.11	1,436,717.68

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Operation and Maintenance Expenses (Continued)			
Other Power Supply Expenses			
555 PURCHASED POWER Energy	OM555	OMPP	1559538.19
555 PURCHASED POWER Demand	OMD555	OMPPD	350837.07
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	5,122,362.96
555 PURCHASED POWER OPTIONS	OMO555	OMPP	0
555 BROKERAGE FEES	OMB555	OMPP	0
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	0
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	48189.16
557 OTHER EXPENSES	OM557	PROFIX	1599248
558 DUPLICATE CHARGES	OM558	Energy	0
Total Other Power Supply Expenses	TPP		8,680,175.38
Total Electric Power Generation Expenses			
Transmission Expenses			
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	51278.57
561 LOAD DISPATCHING	OM561	LBTRAN	136294.18
562 STATION EXPENSES	OM562	PTRAN	102872.03
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	98436.13
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	264049.42
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	30227.33
567 RENTS	OM567	PTRAN	2058.43
568 MAINTENACE SUPERVISION AND ENG	OM568	LBTRAN	38868.14
569 STRUCTURES	OM569	PTRAN	11269.17
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	114809.26
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	174260.22
572 UNDERGROUND LINES	OM572	PTRAN	0
573 MISC PLANT	OM573	PTRAN	7595.34
Total Transmission Expenses			1,032,018.22

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Distribution Operation Expense								
580 OPERATION SUPERVISION AND ENGI	OM580	LBDO	\$ -	0	0	0	0	0
581 LOAD DISPATCHING	OM581	PDIST	\$ -	0	0	0	0	0
582 STATION EXPENSES	OM582	PDIST	\$ -	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	OM583	PDIST	\$ -	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	OM584	PDIST	\$ -	0	0	0	0	0
585 STREET LIGHTING EXPENSE	OM585	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES	OM586	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	PDIST	\$ -	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	PDIST	\$ -	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	\$ -	0	0	0	0	0
588 MISC DISTR EXP -- MAPPIN	OM588x	PDIST	\$ -	0	0	0	0	0
589 RENTS	OM589	PDIST	\$ -	0	0	0	0	0
Total Distribution Operation Expense	OMDO		\$ -					
Operation and Maintenance Expenses (Continued)								
Distribution Maintenance Expense								
590 MAINTENANCE SUPERVISION AND EN	OM590	LBDM	\$ -	0	0	0	0	0
591 STRUCTURES	OM591	PDIST	\$ -	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	OM592	PDIST	\$ -	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	OM593	PDIST	\$ -	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	OM594	PDIST	\$ -	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	OM595	PDIST	\$ -	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	PDIST	\$ -	0	0	0	0	0
597 MAINTENANCE OF METERS	OM597	PDIST	\$ -	0	0	0	0	0
598 MISCELLANEOUS DISTRIBUTION EXPENSES	OM598	PDIST	\$ -	0	0	0	0	0
Total Distribution Maintenance Expense	OMDM		\$ -					
Total Distribution Operation and Maintenance Expenses								
Transmission and Distribution Expenses				13,736,318				
Production, Transmission and Distribution Expenses	OMSUB		\$	416,737,971				

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Distribution Operation Expense								
580 OPERATION SUPERVISION AND ENGI	OM580	LBDO	0	0	0	0	0	0
581 LOAD DISPATCHING	OM581	PDIST	0	0	0	0	0	0
582 STATION EXPENSES	OM582	PDIST	0	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	OM583	PDIST	0	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	OM584	PDIST	0	0	0	0	0	0
585 STREET LIGHTING EXPENSE	OM585	PDIST	0	0	0	0	0	0
586 METER EXPENSES	OM586	PDIST	0	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	PDIST	0	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	PDIST	0	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	0	0	0	0	0	0
588 MISC DISTR EXP – MAPPIN	OM588x	PDIST	0	0	0	0	0	0
589 RENTS	OM589	PDIST	0	0	0	0	0	0
Total Distribution Operation Expense	OMDO							
<u>Operation and Maintenance Expenses (Continued)</u>								
Distribution Maintenance Expense								
590 MAINTENANCE SUPERVISION AND EN	OM590	LBDM	0	0	0	0	0	0
591 STRUCTURES	OM591	PDIST	0	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	OM592	PDIST	0	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	OM593	PDIST	0	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	OM594	PDIST	0	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	OM595	PDIST	0	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	PDIST	0	0	0	0	0	0
597 MAINTENANCE OF METERS	OM597	PDIST	0	0	0	0	0	0
598 MISCELLANEOUS DISTRIBUTION EXPENSES	OM598	PDIST	0	0	0	0	0	0
Total Distribution Maintenance Expense	OMDM							
Total Distribution Operation and Maintenance Expenses								
Transmission and Distribution Expenses								
Production, Transmission and Distribution Expenses	OMSUB							

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Distribution Operation Expense			
580 OPERATION SUPERVISION AND ENGI	OM580	LBDO	0
581 LOAD DISPATCHING	OM581	PDIST	0
582 STATION EXPENSES	OM582	PDIST	0
583 OVERHEAD LINE EXPENSES	OM583	PDIST	0
584 UNDERGROUND LINE EXPENSES	OM584	PDIST	0
585 STREET LIGHTING EXPENSE	OM585	PDIST	0
586 METER EXPENSES	OM586	PDIST	0
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	PDIST	0
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	PDIST	0
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	0
588 MISC DISTR EXP – MAPPIN	OM588x	PDIST	0
589 RENTS	OM589	PDIST	0
Total Distribution Operation Expense	OMDO		
<u>Operation and Maintenance Expenses (Continued)</u>			
Distribution Maintenance Expense			
590 MAINTENANCE SUPERVISION AND EN	OM590	LBDM	0
591 STRUCTURES	OM591	PDIST	0
592 MAINTENANCE OF STATION EQUIPME	OM592	PDIST	0
593 MAINTENANCE OF OVERHEAD LINES	OM593	PDIST	0
594 MAINTENANCE OF UNDERGROUND LIN	OM594	PDIST	0
595 MAINTENANCE OF LINE TRANSFORME	OM595	PDIST	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	PDIST	0
597 MAINTENANCE OF METERS	OM597	PDIST	0
598 MISCELLANEOUS DISTRIBUTION EXPENSES	OM598	PDIST	0
Total Distribution Maintenance Expense	OMDM		
Total Distribution Operation and Maintenance Expenses			
Transmission and Distribution Expenses			
Production, Transmission and Distribution Expenses	OMSUB		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	\$ -	0	0	0	0	0
902 METER READING EXPENSES	OM902	F025	\$ -	0	0	0	0	0
903 RECORDS AND COLLECTION	OM903	F025	\$ -	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	\$ -	0	0	0	0	0
905 MISC CUST ACCOUNTS	OM903	F025	\$ -	0	0	0	0	0
Total Customer Accounts Expense	OMCA		\$ -					
Customer Service Expense								
907 SUPERVISION	OM907	TUP	\$ -	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	\$ 591,192	104389.97	75645.08	40729.07	42316.45	53316.29
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	\$ -	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	\$ -	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	\$ -	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	\$ -	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	\$ -	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	\$ -	0	0	0	0	0
913 ADVERTISING EXPENSES	OM913	TUP	\$ 488,103	103663.39	219971.2	7179.7	3679.68	21007.78
915 MDSE-JOBGING-CONTRACT	OM915	TUP	\$ -	0	0	0	0	0
916 MISC SALES EXPENSE	OM916	TUP	\$ -	0	0	0	0	0
Total Customer Service Expense	OMCS		\$ 1,079,295	208053.36	295616.28	47908.77	45996.13	74324.07
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2			417,817,266				
Operation and Maintenance Expenses (Continued)								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	\$ 14,315,713	2092449.03	1522142.97	1300504.05	1313340.25	1495631.43
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	\$ 6,915,648	432853.99	1082881.21	447533.76	790015.22	520665.52
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	\$ -	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	\$ 3,954,189	337609.86	1175322.5	167190.31	217289.45	526048.51
924 PROPERTY INSURANCE	OM924	TUP	\$ -	0	0	0	0	0
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	\$ 179,889	13413.2	21072.48	15311.2	15178.2	25828.68
926 EMPLOYEE BENEFITS	OM926	LBSUB9	\$ 169,663	4383.08	-2896.98	25050.87	3276.12	0
927 FRANCHISE REQUIREMENTS	OM927	TUP	\$ -	0	0	0	0	0
928 REGULATORY COMMISSION FEES	OM928	TUP	\$ 1,188,958	2785	925	0	0	1790.1
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	\$ -	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	\$ 1,686,131	68132.08	249532.88	81732.32	215359.96	139106.95
931 RENTS AND LEASES	OM931	PGP	\$ 1,933	161.09	161.09	161.09	161.09	161.09
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	\$ 208,156	23769.07	24452.06	14846.22	44645.76	14798.82
Total Administrative and General Expense	OMAG		\$ 28,620,280	2,975,556.40	4,073,593.21	2,052,429.82	2,599,266.05	2,724,031.10
Total Operation and Maintenance Expenses	TOM		\$ 446,437,546					
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP		\$ 224,914,919					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	0	0	0	0	0	0
902 METER READING EXPENSES	OM902	F025	0	0	0	0	0	0
903 RECORDS AND COLLECTION	OM903	F025	0	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	0	0	0	0	0	0
905 MISC CUST ACCOUNTS	OM903	F025	0	0	0	0	0	0
Total Customer Accounts Expense	OMCA							
Customer Service Expense								
907 SUPERVISION	OM907	TUP	0	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	42590.29	45548.65	47955.97	41989.91	36242.46	23856.1
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	0	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	0	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	0	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	0	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	0	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	0	0	0	0	0	0
913 ADVERTISING EXPENSES	OM913	TUP	-36141.33	11695.6	18760.65	13630.34	24487.44	100169
915 MDSE-JOBGING-CONTRACT	OM915	TUP	0	0	0	0	0	0
916 MISC SALES EXPENSE	OM916	TUP	0	0	0	0	0	0
Total Customer Service Expense	OMCS		6448.96	57244.25	66716.62	55620.25	60729.9	124025.1
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2							
Operation and Maintenance Expenses (Continued)								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	1326991.23	427833.15	1263415.19	446430.74	948956.12	1178332.32
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	591943.78	481169.78	617503.76	673906.86	384307.2	494280.5
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	0	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	388800.48	188378.03	280346.99	85723.73	284467.92	205203.9
924 PROPERTY INSURANCE	OM924	TUP	0	0	0	0	0	0
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	14679.26	12401	12401	12401	12401	12401
926 EMPLOYEE BENEFITS	OM926	LBSUB9	53705.24	8851.25	5962.88	6192.45	33341.38	6109.83
927 FRANCHISE REQUIREMENTS	OM927	TUP	0	0	0	0	0	0
928 REGULATORY COMMISSION FEES	OM928	TUP	1353.14	48087.75	665466.25	48046.08	139142.52	18419
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	0	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	94167.83	259652.47	119570.46	108391.43	155943.83	63658.14
931 RENTS AND LEASES	OM931	PGP	161.09	161.09	161.09	161.09	161.09	161.09
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	8698.33	7258.14	13445.04	8125.63	22399.01	9027.98
Total Administrative and General Expense	OMAG		2,480,500.38	1,433,792.66	2,978,272.66	1,389,379.01	1,981,120.07	1,987,593.76
Total Operation and Maintenance Expenses	TOM							
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP							

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Customer Accounts Expense			
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	0
902 METER READING EXPENSES	OM902	F025	0
903 RECORDS AND COLLECTION	OM903	F025	0
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	0
905 MISC CUST ACCOUNTS	OM903	F025	0
Total Customer Accounts Expense	OMCA		
Customer Service Expense			
907 SUPERVISION	OM907	TUP	0
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	36611.39
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	0
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	0
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	0
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	0
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	0
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	0
913 ADVERTISING EXPENSES	OM913	TUP	0
915 MDSE-JOBGING-CONTRACT	OM915	TUP	0
916 MISC SALES EXPENSE	OM916	TUP	0
Total Customer Service Expense	OMCS		36611.39
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2		
<u>Operation and Maintenance Expenses (Continued)</u>			
Administrative and General Expense			
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	999686.96
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	398586.21
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	0
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	97807.2
924 PROPERTY INSURANCE	OM924	TUP	0
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	12401
926 EMPLOYEE BENEFITS	OM926	LBSUB9	25686.5
927 FRANCHISE REQUIREMENTS	OM927	TUP	0
928 REGULATORY COMMISSION FEES	OM928	TUP	262942.92
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	0
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	130882.85
931 RENTS AND LEASES	OM931	PGP	161.09
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	16590.29
Total Administrative and General Expense	OMAG		1,944,745.02
Total Operation and Maintenance Expenses	TOM		
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses								
Steam Power Generation Operation Expenses								
500 OPERATION SUPERVISION & ENGINEERING	LB500	PROFIX	\$ 4,967,667	342832.39	1034681.8	357452.74	317350.15	384316.78
501 FUEL	LB501	Energy	\$ 3,889,944	323255.71	364406.07	338654.53	313289.78	326385.9
502 STEAM EXPENSES	LB502	PROFIX	\$ 9,023,322	657659.63	771924.79	681077.92	630021.61	688026.67
505 ELECTRIC EXPENSES	LB505	PROFIX	\$ 4,523,897	357040.19	416235	378976.79	348125.67	369036.85
506 MISC. STEAM POWER EXPENSES	LB506	PROFIX	\$ 940,518	52261.31	80829.64	70706.68	101840.85	81036.08
507 RENTS	LB507	PROFIX	\$ -	0	0	0	0	0
509 ALLOWANCES	LB509	Energy	\$ -	0	0	0	0	0
Total Steam Power Operation Expenses	LBSUB1		\$ 23,345,348	1066961.13	1268989.43	1130761.39	1079988.13	1138099.6
Steam Power Generation Maintenance Expenses								
510 MAINTENANCE SUPERVISION & ENGINEERING	LB510	Energy	\$ 3,623,969	301562.96	282674.01	280925.01	285686.26	324812.85
511 MAINTENANCE OF STRUCTURES	LB511	PROFIX	\$ 986,831	60839.92	78449.28	79549.6	75632	64969.97
512 MAINTENANCE OF BOILER PLANT	LB512	Energy	\$ 8,700,235	613650.58	728746.59	804049.52	597501.69	694231.84
513 MAINTENANCE OF ELECTRIC PLANT	LB513	Energy	\$ 1,595,642	209176.55	143092.64	90379.11	93612.16	119373.66
514 MAINTENANCE OF MISC STEAM PLANT	LB514	PROFIX	\$ 200,886	16879.23	22485.07	12128	16408.41	14092.69
Total Steam Power Generation Maintenance Expense	LBSUB2		\$ 15,107,564	1202109.24	1255447.59	1267031.24	1068840.52	1217481.01
Total Steam Power Generation Expense			\$ 38,452,913	2269070.37	2524437.02	2397792.63	2148828.65	2355580.61
Labor Expenses (Continued)								
Other Power Generation Operation Expense								
546 OPERATION SUPERVISION & ENGINEERING	LB546	PROFIX	\$ -	0	0	0	0	0
547 FUEL	LB547	Energy	\$ -	0	0	0	0	0
548 GENERATION EXPENSE	LB548	PROFIX	\$ -	0	0	0	0	0
549 MISC OTHER POWER GENERATION	LB549	PROFIX	\$ -	0	0	0	0	0
550 RENTS	LB550	PROFIX	\$ -	0	0	0	0	0
Total Other Power Generation Expenses	LBSUB7		\$ -					
Other Power Generation Maintenance Expense								
551 MAINTENANCE SUPERVISION & ENGINEERING	LB551	PROFIX	\$ -	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	LB552	PROFIX	\$ -	0	0	0	0	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB553	PROFIX	\$ 89,555	682.21	4299.67	1026.96	2400.3	4848.64
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	LB554	PROFIX	\$ -	0	0	0	0	0
Total Other Power Generation Maintenance Expense	LBSUB8		\$ 89,555					
Total Other Power Generation Expense			\$ 89,555					
Total Production Expense	LPREX		\$ 38,542,468					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses								
Steam Power Generation Operation Expenses	LB500	PROFIX	338156.02	414149.39	371014.23	359005.08	369873.15	334189.99
500 OPERATION SUPERVISION & ENGINEERING	LB501	Energy	309863.06	297596.67	304977.88	310355.07	339148.89	336547.05
501 FUEL	LB502	PROFIX	640194.64	1123637.4	744724.17	661984.49	702417.45	982572.63
502 STEAM EXPENSES	LB505	PROFIX	342341.75	393006.64	354302.21	368561.14	384521.42	384533.54
505 ELECTRIC EXPENSES	LB506	PROFIX	63015.48	66970.66	87852.14	88369.17	86572.5	91267.67
506 MISC. STEAM POWER EXPENSES	LB507	PROFIX	0	0	0	0	0	0
507 RENTS	LB509	Energy	0	0	0	0	0	0
509 ALLOWANCES								
Total Steam Power Operation Expenses	LBSUB1		1045551.87	1583614.7	1186878.52	1118914.8	1173511.37	1458373.84
Steam Power Generation Maintenance Expenses	LB510	Energy	297255.94	289425	296206.84	280281.91	307241.14	294029.27
510 MAINTENANCE SUPERVISION & ENGINEERING	LB511	PROFIX	50081.03	70791.44	106230.99	106856.88	116200.49	96973.59
511 MAINTENANCE OF STRUCTURES	LB512	Energy	617716.63	961798.07	675983.16	535600.92	651081.61	924014.95
512 MAINTENANCE OF BOILER PLANT	LB513	Energy	96940.39	142971.1	124922.34	132978.24	129288.01	126399.56
513 MAINTENANCE OF ELECTRIC PLANT	LB514	PROFIX	9843.3	16400.27	20426.8	23473.83	26283.4	15419.85
514 MAINTENANCE OF MISC STEAM PLANT								
Total Steam Power Generation Maintenance Expense	LBSUB2		1071837.29	1481385.88	1223770.13	1079191.78	1230094.65	1456837.22
Total Steam Power Generation Expense			2117389.16	3065000.58	2410648.65	2198106.58	2403606.02	2915211.06
Labor Expenses (Continued)								
Other Power Generation Operation Expense	LB546	PROFIX	0	0	0	0	0	0
546 OPERATION SUPERVISION & ENGINEERING	LB547	Energy	0	0	0	0	0	0
547 FUEL	LB548	PROFIX	0	0	0	0	0	0
548 GENERATION EXPENSE	LB549	PROFIX	0	0	0	0	0	0
549 MISC OTHER POWER GENERATION	LB550	PROFIX	0	0	0	0	0	0
550 RENTS								
Total Other Power Generation Expenses	LBSUB7		0	0	0	0	0	0
Other Power Generation Maintenance Expense	LB551	PROFIX	0	0	0	0	0	0
551 MAINTENANCE SUPERVISION & ENGINEERING	LB552	PROFIX	0	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	LB553	PROFIX	903.26	760.91	37267.71	11775.09	12921.35	10584.31
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB554	PROFIX	0	0	0	0	0	0
554 MAINTENANCE OF MISC OTHER POWER GEN PLT								
Total Other Power Generation Maintenance Expense	LBSUB8		903.26	760.91	37267.71	11775.09	12921.35	10584.31
Total Other Power Generation Expense			903.26	760.91	37267.71	11775.09	12921.35	10584.31
Total Production Expense	LPREX							

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Labor Expenses			
Steam Power Generation Operation Expenses			
500 OPERATION SUPERVISION & ENGINEERING	LB500	PROFIX	344645.64
501 FUEL	LB501	Energy	325463.54
502 STEAM EXPENSES	LB502	PROFIX	739080.82
505 ELECTRIC EXPENSES	LB505	PROFIX	427215.91
506 MISC. STEAM POWER EXPENSES	LB506	PROFIX	69795.43
507 RENTS	LB507	PROFIX	0
509 ALLOWANCES	LB509	Energy	0
Total Steam Power Operation Expenses	LBSUB1		1236092.16
Steam Power Generation Maintenance Expenses			
510 MAINTENANCE SUPERVISION & ENGINEERING	LB510	Energy	383868.11
511 MAINTENANCE OF STRUCTURES	LB511	PROFIX	80256.21
512 MAINTENANCE OF BOILER PLANT	LB512	Energy	895859.55
513 MAINTENANCE OF ELECTRIC PLANT	LB513	Energy	186508.29
514 MAINTENANCE OF MISC STEAM PLANT	LB514	PROFIX	7045.58
Total Steam Power Generation Maintenance Expense	LBSUB2		1553537.74
Total Steam Power Generation Expense			2642951.16
Labor Expenses (Continued)			
Other Power Generation Operation Expense			
546 OPERATION SUPERVISION & ENGINEERING	LB546	PROFIX	0
547 FUEL	LB547	Energy	0
548 GENERATION EXPENSE	LB548	PROFIX	0
549 MISC OTHER POWER GENERATION	LB549	PROFIX	0
550 RENTS	LB550	PROFIX	0
Total Other Power Generation Expenses	LBSUB7		
Other Power Generation Maintenance Expense			
551 MAINTENANCE SUPERVISION & ENGINEERING	LB551	PROFIX	
552 MAINTENANCE OF STRUCTURES	LB552	PROFIX	
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB553	PROFIX	2084.81
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	LB554	PROFIX	
Total Other Power Generation Maintenance Expense	LBSUB8		
Total Other Power Generation Expense			
Total Production Expense	LPREX		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses (Continued)								
Purchased Power								
555 PURCHASED POWER	LB555	OMPP	\$ -	0	0	0	0	0
555 PURCHASED POWER Demand	LBD555	OMPPD	\$ -	0	0	0	0	0
555 PURCHASED POWER OPTIONS	LBO555	OMPP	\$ -	0	0	0	0	0
555 BROKERAGE FEES	LBB555	OMPP	\$ -	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	\$ -	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	\$ -	0	0	0	0	0
557 OTHER EXPENSES	LB557	PROFIX	\$ -	0	0	0	0	0
558 DUPLICATE CHARGES	LB558	Energy	\$ -	0	0	0	0	0
Total Purchased Power Labor	LBPP		\$ -					
Transmission Labor Expenses								
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	\$ 835,977	155357.97	88621.66	61719.3	53192.77	69331.26
561 LOAD DISPATCHING	LB561	PTRAN	\$ 1,304,969	240520.6	133245.05	93819.32	87693.64	104400.26
562 STATION EXPENSES	LB562	PTRAN	\$ 598,382	102945.93	50883.95	33705.43	39512.69	54112.06
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	\$ 236,393	52690.64	20206.01	20032.96	18769.45	17519.18
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	\$ -	0	0	0	0	0
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	\$ 312,375	55300.19	33112.8	26544.3	26563.55	28599.72
567 RENTS	LB567	PTRAN	\$ -	0	0	0	0	0
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	\$ 644,925	120270.89	65874.61	48314.25	39737.97	53182.86
569 MAINTENACE OF STRUCTURES	LB569	PTRAN	\$ 318	36.88	59.34	0	0	59.12
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	\$ 1,433,304	240458.8	137581.27	112331.02	103977.18	112839.1
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	\$ 1,067,766	187769.72	120250.23	62124.04	70835.46	82150.36
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	\$ 46,439	6906.42	2875.43	2872.93	4248.62	4851.27
Total Transmission Labor Expenses	LBTRAN		\$ 6,480,848	1162258.04	652710.35	461463.55	444531.33	527045.19
Distribution Operation Labor Expense								
580 OPERATION SUPERVISION AND ENGI	LB580	F023	\$ -	0	0	0	0	0
581 LOAD DISPATCHING	LB581	PDIST	\$ -	0	0	0	0	0
582 STATION EXPENSES	LB582	PDIST	\$ -	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	LB583	PDIST	\$ -	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	\$ -	0	0	0	0	0
585 STREET LIGHTING EXPENSE	LB585	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES	LB586	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	\$ -	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	\$ -	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	\$ -	0	0	0	0	0
589 RENTS	LB589	PDIST	\$ -	0	0	0	0	0
Total Distribution Operation Labor Expense	LBDO		\$ -					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses (Continued)								
Purchased Power								
555 PURCHASED POWER	LB555	OMPP	0	0	0	0	0	0
555 PURCHASED POWER Demand	LBD555	OMPPD	0	0	0	0	0	0
555 PURCHASED POWER OPTIONS	LBO555	OMPP	0	0	0	0	0	0
555 BROKERAGE FEES	LBB555	OMPP	0	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	0	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	0	0	0	0	0	0
557 OTHER EXPENSES	LB557	PROFIX	0	0	0	0	0	0
558 DUPLICATE CHARGES	LB558	Energy	0	0	0	0	0	0
Total Purchased Power Labor	LBPP							
Transmission Labor Expenses								
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	57113.62	58908.5	68081.43	56191.8	51380.65	68130.77
561 LOAD DISPATCHING	LB561	PTRAN	79471.75	90840.85	104792.75	86864.08	84835.7	115440.78
562 STATION EXPENSES	LB562	PTRAN	43463.43	48316.48	56470.33	35035.32	46067.52	51613.79
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	14223.62	16460.25	15132.13	14168.98	13692.1	15806.34
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	0	0	0	0	0	0
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	21343.51	20102.2	25810.07	11252.29	17357.03	25204.78
567 RENTS	LB567	PTRAN	0	0	0	0	0	0
568 MAINTENANCE SUPERVISION AND ENG	LB568	PTRAN	43994.75	45554.09	50783.31	42264.13	40489.73	55734.99
569 MAINTENANCE OF STRUCTURES	LB569	PTRAN	26.22	0	24.61	26.14	26.21	0.65
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	98690.36	92937.1	116008.73	108080.33	93852.16	126204.48
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	66143.16	68592.74	93608.24	76903.52	71073.25	95620.68
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	4378.83	3303.42	3349.41	3196.71	3607.42	3592.3
Total Transmission Labor Expenses	LBTRAN		428849.25	445015.63	534061.01	433983.3	422381.77	557349.56
Distribution Operation Labor Expense								
580 OPERATION SUPERVISION AND ENGI	LB580	F023	0	0	0	0	0	0
581 LOAD DISPATCHING	LB581	PDIST	0	0	0	0	0	0
582 STATION EXPENSES	LB582	PDIST	0	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	LB583	PDIST	0	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	0	0	0	0	0	0
585 STREET LIGHTING EXPENSE	LB585	PDIST	0	0	0	0	0	0
586 METER EXPENSES	LB586	PDIST	0	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	0	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	0	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	0	0	0	0	0	0
589 RENTS	LB589	PDIST	0	0	0	0	0	0
Total Distribution Operation Labor Expense	LBDO							

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Labor Expenses (Continued)			
Purchased Power			
555 PURCHASED POWER	LB555	OMPP	0
555 PURCHASED POWER Demand	LBD555	OMPPD	0
555 PURCHASED POWER OPTIONS	LBO555	OMPP	0
555 BROKERAGE FEES	LBB555	OMPP	0
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	0
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	0
557 OTHER EXPENSES	LB557	PROFIX	0
558 DUPLICATE CHARGES	LB558	Energy	0
Total Purchased Power Labor	LBPP		0
Transmission Labor Expenses			
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	47946.89
561 LOAD DISPATCHING	LB561	PTRAN	83043.95
562 STATION EXPENSES	LB562	PTRAN	36255.02
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	17691.07
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	21184.45
567 RENTS	LB567	PTRAN	
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	38723.49
569 MAINTENACE OF STRUCTURES	LB569	PTRAN	59.17
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	90343.75
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	72694.7
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	3256.6
Total Transmission Labor Expenses	LBTRAN		205077.71
Distribution Operation Labor Expense			
580 OPERATION SUPERVISION AND ENGI	LB580	F023	0
581 LOAD DISPATCHING	LB581	PDIST	0
582 STATION EXPENSES	LB582	PDIST	0
583 OVERHEAD LINE EXPENSES	LB583	PDIST	0
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	0
585 STREET LIGHTING EXPENSE	LB585	PDIST	0
586 METER EXPENSES	LB586	PDIST	0
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	0
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	0
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	0
589 RENTS	LB589	PDIST	0
Total Distribution Operation Labor Expense	LBDO		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses (Continued)								
Distribution Maintenance Labor Expense								
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	\$ -	0	0	0	0	0
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	\$ -	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	\$ -	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	\$ -	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	\$ -	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	\$ -	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	\$ -	0	0	0	0	0
597 MAINTENANCE OF METERS	LB597	PDIST	\$ -	0	0	0	0	0
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	\$ -	0	0	0	0	0
Total Distribution Maintenance Labor Expense	LBDM		\$ -					
Total Distribution Operation and Maintenance Labor Expenses		PDIST						
Transmission and Distribution Labor Expenses				6,480,848				
Production, Transmission and Distribution Labor Expenses	LBSUB		\$ 45,023,316					
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	\$ -	0	0	0	0	0
902 METER READING EXPENSES	LB902	F025	\$ -	0	0	0	0	0
903 RECORDS AND COLLECTION	LB903	F025	\$ -	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	\$ -	0	0	0	0	0
905 MISC CUST ACCOUNTS	LB903	F025	\$ -	0	0	0	0	0
Total Customer Accounts Labor Expense	LBCA		\$ -					
Customer Service Expense								
907 SUPERVISION	LB907	TUP	\$ -	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	\$ 544,608	98543.49	44838.51	39429.59	38666.03	49827.22
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	\$ -	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	\$ -	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	\$ -	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	\$ -	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	\$ -	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	\$ -	0	0	0	0	0
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	\$ -	0	0	0	0	0
915 MDSE-JOBING-CONTRACT	LB915	TUP	\$ -	0	0	0	0	0
916 MISC SALES EXPENSE	LB916	TUP	\$ -	0	0	0	0	0
Total Customer Service Labor Expense	LBCS		\$ 544,608	98543.49	44838.51	39429.59	38666.03	49827.22
Sub-Total Labor Exp	LBSUB9			45,567,924				

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses (Continued)								
Distribution Maintenance Labor Expense								
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	0	0	0	0	0	0
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	0	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	0	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	0	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	0	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	0	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	0	0	0	0	0	0
597 MAINTENANCE OF METERS	LB597	PDIST	0	0	0	0	0	0
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	0	0	0	0	0	0
Total Distribution Maintenance Labor Expense	LBDM							
Total Distribution Operation and Maintenance Labor Expenses		PDIST						
Transmission and Distribution Labor Expenses								
Production, Transmission and Distribution Labor Expenses	LBSUB							
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	0	0	0	0	0	0
902 METER READING EXPENSES	LB902	F025	0	0	0	0	0	0
903 RECORDS AND COLLECTION	LB903	F025	0	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	0	0	0	0	0	0
905 MISC CUST ACCOUNTS	LB903	F025	0	0	0	0	0	0
Total Customer Accounts Labor Expense	LBCA							
Customer Service Expense								
907 SUPERVISION	LB907	TUP	0	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	37915.48	41556.72	44591.58	38345.68	32873.52	44118.04
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	0	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	0	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	0	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	0	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	0	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	0	0	0	0	0	0
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	0	0	0	0	0	0
915 MDSE-JOBING-CONTRACT	LB915	TUP	0	0	0	0	0	0
916 MISC SALES EXPENSE	LB916	TUP	0	0	0	0	0	0
Total Customer Service Labor Expense	LBCS		37915.48	41556.72	44591.58	38345.68	32873.52	44118.04
Sub-Total Labor Exp	LBSUB9							

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Labor Expenses (Continued)			
Distribution Maintenance Labor Expense			
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	
597 MAINTENANCE OF METERS	LB597	PDIST	
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	
Total Distribution Maintenance Labor Expense	LBDM		
Total Distribution Operation and Maintenance Labor Expenses		PDIST	
Transmission and Distribution Labor Expenses			
Production, Transmission and Distribution Labor Expenses	LBSUB		
Customer Accounts Expense			
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	
902 METER READING EXPENSES	LB902	F025	
903 RECORDS AND COLLECTION	LB903	F025	
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	
905 MISC CUST ACCOUNTS	LB903	F025	
Total Customer Accounts Labor Expense	LBCA		
Customer Service Expense			
907 SUPERVISION	LB907	TUP	
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	33902.45
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	
915 MDSE-JOBING-CONTRACT	LB915	TUP	
916 MISC SALES EXPENSE	LB916	TUP	
Total Customer Service Labor Expense	LBCS		33902.45
Sub-Total Labor Exp	LBSUB9		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses (Continued)								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	LB920	LBSUB9	\$ 14,315,714	2092449.04	1522142.8	1300504.05	1313340.25	1495631.43
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB9	\$ -	0	0	0	0	0
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB922	LBSUB9	\$ -	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	LB923	LBSUB9	\$ -	0	0	0	0	0
924 PROPERTY INSURANCE	LB924	TUP	\$ -	0	0	0	0	0
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB9	\$ 27,509	2777.2	3471.48	2777.2	2777.2	13427.68
926 EMPLOYEE BENEFITS	LB926	LBSUB9	\$ 17,136	2711	-43974.67	0	0	0
928 REGULATORY COMMISSION FEES	LB928	TUP	\$ -	0	0	0	0	0
929 DUPLICATE CHARGES-CR	LB929	LBSUB9	\$ -	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	LB930	LBSUB9	\$ -	0	0	0	0	0
931 RENTS AND LEASES	LB931	PGP	\$ -	0	0	0	0	0
935 MAINTENANCE OF GENERAL PLANT	LB935	PGP	\$ 74,927	14602.3	14130.42	6605.75	5191.93	4971.6
Total Administrative and General Expense	LBAG		\$ 14,435,286					
Total Operation and Maintenance Expenses	TLB		\$ 60,003,210					
Operation and Maintenance Expenses Less Purchase Power	LBLPP		\$ 60,003,210					
Other Expenses								
Depreciation Expenses								
Production	DEPRDP2	PPROD	\$ 28,815,395	2347440.74	2389099.7	2595994.55	2361961.48	2361968.56
Transmission	DEPRDP3	PTRAN	\$ 5,182,459	443546.44	533184.66	214261.5	442312.53	442305.66
Transmission	DEPRDP4	PTRAN	\$ -					
Distribution	DEPRDP5	PDIST	\$ -					
General & Common Plant	DEPRDP6	PGP	\$ 238,155	17050.71	19802.63	19799.44	19799.44	19766.55
Other Plant	DEPROTH	TPIS	\$ -	0	0	0	0	0
Total Depreciation Expense	TDEPR		\$ 34,236,009	2808037.89	2942086.99	2830055.49	2824073.45	2824040.77
Accretion Expense								
Production	ACRTNP	F017	\$ -	0	0	0	0	0
Transmission	ACRTNT	PTRAN	\$ -	0	0	0	0	0
Distribution	ACRTND	PDIST	\$ -	0	0	0	0	0
Total Accretion Expense	TACRTN		\$ -					
Property Taxes & Other	PTAX	TUP	\$ (94,563)	\$ (379,997)	\$ 87,636	\$ -	\$ -	\$ 910
Amortization of Investment Tax Credit	OTAX	TUP	\$ -	0	0	0	0	0
Other Expenses	OT	TUP	\$ (365,864)	\$ (6,691)	\$ (14,191)	\$ (18,627)	\$ (23,851)	\$ (16,042)
Interest	INTLTD	TUP	\$ 47,622,710	4168487.53	4316793.16	4234968.72	3796291.74	4133482.27
Other Deductions	DEDUCT	TUP	\$ 109,257	7611	15379	4539	6545	5640
Total Other Expenses	TOE		\$ 81,507,549	\$ 3,789,411	\$ 4,405,617	\$ 4,220,881	\$ 3,778,986	\$ 4,123,991
Total Cost of Service (O&M + Other Expenses)			\$ 527,945,095					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses (Continued)								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	LB920	LBSUB9	1326991.23	427833.15	1263415.19	446430.74	948956.12	1178332.32
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB9	0	0	0	0	0	0
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB922	LBSUB9	0	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	LB923	LBSUB9	0	0	0	0	0	0
924 PROPERTY INSURANCE	LB924	TUP	0	0	0	0	0	0
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB9	2278.26	0	0	0	0	0
926 EMPLOYEE BENEFITS	LB926	LBSUB9	23360	5840	5840	5840	5840	5840
928 REGULATORY COMMISSION FEES	LB928	TUP	0	0	0	0	0	0
929 DUPLICATE CHARGES-CR	LB929	LBSUB9	0	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	LB930	LBSUB9	0	0	0	0	0	0
931 RENTS AND LEASES	LB931	PGP	0	0	0	0	0	0
935 MAINTENANCE OF GENERAL PLANT	LB935	PGP	5560.19	2953.32	3794.54	2464	6700.24	5197.69
Total Administrative and General Expense	LBAG							
Total Operation and Maintenance Expenses	TLB							
Operation and Maintenance Expenses Less Purchase Power	LBLPP							
Other Expenses								
Depreciation Expenses								
Production	DEPRDP2	PPROD	2361962.84	2422279.6	2384018.59	2354733.3	2368037.83	2494767.54
Transmission	DEPRDP3	PTRAN	442357.04	442363.4	442363.15	442486.5	440016.44	450445.41
Transmission	DEPRDP4	PTRAN						
Distribution	DEPRDP5	PDIST						
General & Common Plant	DEPRDP6	PGP	19733.28	21031.35	19852.73	20082.98	19987.32	21286.62
Other Plant	DEPROTH	TPIS	0	0	0	0	0	0
Total Depreciation Expense	TDEPR		2824053.16	2885674.35	2846234.47	2817302.78	2828041.59	2966499.57
Accretion Expense								
Production	ACRTNP	F017	0	0	0	0	0	0
Transmission	ACRTNT	PTRAN	0	0	0	0	0	0
Distribution	ACRTND	PDIST	0	0	0	0	0	0
Total Accretion Expense	TACRTN							
Property Taxes & Other	PTAX	TUP	\$ 65,000	\$ 2,342	\$ 65,000	\$ -	\$ (429)	\$ 65,000
Amortization of Investment Tax Credit	OTAX	TUP	0	0	0	0	0	0
Other Expenses	OT	TUP	\$ (27,557)	\$ (8,263)	\$ (42,136)	\$ (42,545)	\$ (48,997)	\$ (56,550)
Interest	INTLTD	TUP	3848131.38	3699835.35	3741933.32	3942436.65	3958146.18	3830668.47
Other Deductions	DEDUCT	TUP	-2109	4540	14599	10828	16243	12411
Total Other Expenses	TOE		\$ 3,883,465	\$ 3,698,454	\$ 3,779,396	\$ 3,910,720	\$ 3,924,964	\$ 3,851,529
Total Cost of Service (O&M + Other Expenses)								

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
<u>Labor Expenses (Continued)</u>			
Administrative and General Expense			
920 ADMIN. & GEN. SALARIES-	LB920	LBSUB9	
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB9	999687.37
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB922	LBSUB9	
923 OUTSIDE SERVICES EMPLOYED	LB923	LBSUB9	
924 PROPERTY INSURANCE	LB924	TUP	
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB9	0
926 EMPLOYEE BENEFITS	LB926	LBSUB9	5840
928 REGULATORY COMMISSION FEES	LB928	TUP	
929 DUPLICATE CHARGES-CR	LB929	LBSUB9	
930 MISCELLANEOUS GENERAL EXPENSES	LB930	LBSUB9	
931 RENTS AND LEASES	LB931	PGP	
935 MAINTENANCE OF GENERAL PLANT	LB935	PGP	2754.81
Total Administrative and General Expense	LBAG		
Total Operation and Maintenance Expenses	TLB		
Operation and Maintenance Expenses Less Purchase Power	LBLPP		
<u>Other Expenses</u>			
Depreciation Expenses			
Production			
Transmission	DEPRDP2	PPROD	2373130.48
Transmission	DEPRDP3	PTRAN	446815.89
Distribution	DEPRDP4	PTRAN	
General & Common Plant	DEPRDP5	PDIST	
Other Plant	DEPRDP6	PGP	19962.11
	DEPROTH	TPIS	0
Total Depreciation Expense	TDEPR		2839908.48
Accretion Expense			
Production			
Transmission	ACRTNP	F017	0
Distribution	ACRTNT	PTRAN	0
	ACRTND	PDIST	0
Total Accretion Expense	TACRTN		
Property Taxes & Other	PTAX	TUP	\$ (25)
Amortization of Investment Tax Credit	OTAX	TUP	0
Other Expenses	OT	TUP	\$ (60,414)
Interest	INTLTD	TUP	3951535
Other Deductions	DEDUCT	TUP	13031
Total Other Expenses	TOE		\$ 3,904,127
Total Cost of Service (O&M + Other Expenses)			

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Revenues								
Jackson Purchase			\$ 31,526,082	2,047,421	2,967,876	3,236,562	2,630,578	2,282,284
Kenergy			\$ 56,579,648	3,789,093	5,385,841	5,977,907	4,990,050	4,209,222
Meade			\$ 22,828,970	1,551,653	2,374,865	2,690,998	2,281,167	1,830,442
Large Industrial			\$ 39,110,620	3,326,073	3,242,060	3,257,550	3,000,170	3,334,841
Century Total			\$ 150,725,511	14,123,587	13,900,845	12,327,658	10,978,277	13,026,782
Alcan Total			\$ 131,680,624	11,327,935	11,867,881	11,227,291	10,087,671	11,349,236
	Total Rural		\$ 110,934,700	\$ 7,388,167	\$ 10,728,582	\$ 11,905,467	\$ 9,901,794	\$ 8,321,948
	Total Industrial		\$ 39,110,620	\$ 8,666,818	\$ 11,002,766	\$ 11,926,456	\$ 10,271,387	\$ 9,374,506
	Total Smelter		\$ 282,406,135	\$ 25,451,523	\$ 25,768,725	\$ 23,554,949	\$ 21,065,948	\$ 24,376,019
	Total		\$ 432,451,455	\$ 36,165,762	\$ 39,739,368	\$ 38,717,967	\$ 33,967,912	\$ 36,032,808
Century Invoiced			\$ 149,837,373	12,898,686	13,350,197	12,412,617	10,978,277	13,026,782
Alcan Invoiced			\$ 131,911,075	10,982,583	11,672,836	11,353,440	10,087,671	11,349,236
Century Adjustments			\$ 888,139	1,224,902	550,648	(84,959)		
Alcan Adjustments			\$ (230,451)	345,352	195,044	(126,150)		
Off System Sales			\$ 76,543,801	\$ 1,839,442	\$ 4,073,308	\$ 8,147,840	\$ 9,539,433	\$ 7,986,498
Income from Leased Property Net			\$ 149,673	\$ 149,673	\$ -	\$ -	\$ -	\$ -
Other Operating Revenue & Income			\$ 13,778,745	\$ 1,230,861	\$ 1,033,968	\$ 1,152,998	\$ 1,145,023	\$ 1,070,097
OSS Variable O&M			\$ 46,035,981	\$ 1,471,622	\$ 2,691,212	\$ 4,162,194	\$ 5,284,841	\$ 5,083,040
Energy								
Jackson Purchase			694,512,540	45,926,970	65,978,630	71,338,200	59,712,514	49,429,743
Kenergy			1,255,008,258	85,135,870	120,014,010	132,891,880	114,367,690	91,992,020
Meade			499,627,006	34,444,920	51,694,410	59,035,140	51,393,370	38,028,116
Large Industrial			928,887,170	78,192,702	74,359,872	75,056,282	70,510,685	78,126,590
Century			3,949,411,321	310,167,027	331,563,740	339,238,984	318,278,276	343,763,177
Alcan			3,163,910,039	257,031,413	268,912,646	270,478,213	245,969,029	270,738,402
Total Rural			2,449,147,804	165,507,760	237,687,050	263,265,220	225,473,574	179,449,879
Total Industrial			928,887,170	78,192,702	74,359,872	75,056,282	70,510,685	78,126,590
Total Smelter			7,113,321,360	567,198,440	600,476,386	609,717,197	564,247,305	614,501,579
Total			10,491,356,334	810,898,902	912,523,308	948,038,699	860,231,564	872,078,048

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Revenues								
Jackson Purchase			1,799,767	2,308,067	3,063,639	3,258,780	3,399,012	2,561,800
Kenergy			3,188,379	4,134,538	5,323,163	5,636,870	5,853,842	4,573,561
Meade			1,214,667	1,532,681	1,963,540	2,110,692	2,169,733	1,693,499
Large Industrial			3,161,352	3,245,699	3,234,324	3,234,990	3,373,185	3,344,243
Century Total			12,044,160	12,679,922	11,679,623	12,055,865	12,367,467	11,801,654
Alcan Total			10,471,146	11,169,007	10,543,631	10,857,129	10,839,072	10,177,927
	Total Rural		\$ 6,202,813	\$ 7,975,287	\$ 10,350,341	\$ 11,006,341	\$ 11,422,586	\$ 8,828,859
	Total Industrial		\$ 7,564,398	\$ 8,912,918	\$ 10,521,026	\$ 10,982,552	\$ 11,396,759	\$ 9,611,302
	Total Smelter		\$ 22,515,306	\$ 23,848,930	\$ 22,223,254	\$ 22,912,994	\$ 23,206,539	\$ 21,979,581
	Total		\$ 31,879,471	\$ 35,069,915	\$ 35,807,919	\$ 37,154,326	\$ 38,002,310	\$ 34,152,683
Century Invoiced			12,044,160	12,679,922	11,679,623	12,055,865	12,367,467	12,580,920
Alcan Invoiced			10,471,146	11,169,007	10,543,631	10,857,129	10,839,072	10,806,724
Century Adjustments								(779,265)
Alcan Adjustments								(628,797)
Off System Sales			\$ 5,678,794	\$ 6,341,556	\$ 7,049,362	\$ 7,908,927	\$ 8,630,309	\$ 5,166,061
Income from Leased Property Net			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Other Operating Revenue & Income			\$ 1,140,133	\$ 1,143,171	\$ 1,284,686	\$ 1,142,016	\$ 1,145,336	\$ 1,142,234
OSS Variable O&M			\$ 3,852,774	\$ 3,932,574	\$ 3,863,529	\$ 4,155,945	\$ 4,803,709	\$ 3,568,984
Energy								
Jackson Purchase			40,334,720	49,465,221	67,937,977	74,389,907	74,455,490	53,358,978
Kenergy			72,904,910	88,391,581	119,415,050	128,859,539	129,305,728	95,902,980
Meade			28,079,875	32,805,170	43,966,515	47,969,570	47,509,670	35,325,370
Large Industrial			78,086,611	79,512,076	79,858,265	78,927,327	82,005,334	79,182,043
Century			323,212,786	331,276,534	324,397,171	337,256,977	345,310,998	317,766,683
Alcan			260,668,275	268,579,997	259,859,800	268,729,560	268,160,608	257,328,832
Total Rural			141,319,505	170,661,972	231,319,542	251,219,016	251,270,888	184,587,328
Total Industrial			78,086,611	79,512,076	79,858,265	78,927,327	82,005,334	79,182,043
Total Smelter			583,881,061	599,856,531	584,256,971	605,986,537	613,471,606	575,095,515
Total			803,287,177	850,030,579	895,434,778	936,132,880	946,747,828	838,864,886

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Revenues			
Jackson Purchase			1,970,297
Kenergy			3,517,183
Meade			1,415,034
Large Industrial			3,356,132
Century Total			13,739,670
Alcan Total			11,762,698
	Total Rural		\$ 6,902,515
	Total Industrial		\$ 8,288,350
	Total Smelter		\$ 25,502,368
	Total		\$ 35,761,015
Century Invoiced			13,762,856
Alcan Invoiced			11,778,599
Century Adjustments			(23,186)
Alcan Adjustments			(15,901)
Off System Sales			4,182,271
Income from Leased Property Net			\$ -
Other Operating Revenue & Income			\$ 1,148,221
OSS Variable O&M			\$ 3,165,556
Energy			
Jackson Purchase			42,184,190
Kenergy			75,827,000
Meade			29,374,880
Large Industrial			75,069,383
Century			327,178,968
Alcan			267,453,264
Total Rural			147,386,070
Total Industrial			75,069,383
Total Smelter			594,632,232
Total			817,087,685

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Plant in Service</u>							
Intangible Plant	INTPLT	PT&D	\$ 66,895	58,634	-	-	8,261
Production Plant	PPROD	F001	\$ 1,686,796,955	1,686,796,955	-	-	-
Transmission Plant	PTRAN	F002	\$ 237,659,206	-	-	-	237,659,206
Distribution Plant	PDIST	F003	\$ -	-	-	-	-
Total Production & Transmission Plant	PT&D		1,924,456,160	1,686,796,955	-	-	237,659,206
General Plant	PGP	PT&D	\$ 18,511,051	16,225,043	-	-	2,286,008
Total Plant in Service	TPIS		\$ 1,943,034,107	\$ 1,703,080,632	\$ -	\$ -	\$ 239,953,475
<u>Construction Work in Progress (CWIP)</u>							
CWIP Production	CWIP1	PPROD	\$ 22,411,274	22,411,274	-	-	-
CWIP Transmission	CWIP2	PTRAN	\$ 7,475,859	-	-	-	7,475,859
CWIP Distribution Plant	CWIP3	PDIST	\$ -	-	-	-	-
CWIP General Plant	CWIP4	PT&D	\$ 16,915,005	14,826,100	-	-	2,088,905
Total Construction Work in Progress	TCWIP		\$ 46,802,138	\$ 37,237,374	\$ -	\$ -	\$ 9,564,764
Total Utility Plant			\$ 1,989,836,245	\$ 1,740,318,006	\$ -	\$ -	\$ 249,518,239

BIG RIVERS ELECTRIC CORPORATION
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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Rate Base</u>							
Total Utility Plant	TUP		\$ 1,989,836,245	\$ 1,740,318,006	\$ -	\$ -	\$ 249,518,239
<u>Less: Accumulated Provision for Depreciation</u>							
Production	ADEPREPA	PPROD	\$ 790,847,523	790,847,523	-	-	-
Transmission	ADEPRTP	PTRAN	\$ 107,564,747	-	-	-	107,564,747
Distribution	ADEPRD11	PDIST	\$ -	-	-	-	-
General & Common Plant	ADEPRD12	PT&D	\$ 6,300,770	5,522,661	-	-	778,109
Intangible, Misc, and Other Plant	ADEPRGP	PT&D	\$ -	-	-	-	-
Retirement Work In Progress	ADEPRRT	PT&D	\$ -	-	-	-	-
Total Accumulated Depreciation	TADEPR		\$ 904,713,040	\$ 796,370,184	\$ -	\$ -	\$ 108,342,855
<u>Net Utility Plant</u>	NTPLANT		\$ 1,085,123,206	\$ 943,947,822	\$ -	\$ -	\$ 141,175,384
<u>Working Capital</u>							
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP	\$ 28,114,365	13,900,247	11,969,243	-	2,244,875
Materials and Supplies	M&S	TPIS	\$ 22,777,820	19,964,891	-	-	2,812,929
Fuel Stock	PREPAY	TPIS	\$ 34,326,112	30,087,036	-	-	4,239,076
Total Working Capital	TWC		\$ 85,218,297	\$ 63,952,174	\$ 11,969,243	\$ -	\$ 9,296,880
Net Rate Base	RB		\$ 1,170,341,502	\$ 1,007,899,995	\$ 11,969,243	\$ -	\$ 150,472,264

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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Operation and Maintenance Expenses</u>							
Steam Power Generation Operation Expenses							
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	\$ 4,974,566	4,974,566	-	-	-
501 FUEL	OM501	Energy	\$ 200,919,367	-	200,919,367	-	-
502 STEAM EXPENSES	OM502	PROFIX	\$ 34,453,882	34,453,882	-	-	-
505 ELECTRIC EXPENSES	OM505	PROFIX	\$ 5,730,122	5,730,122	-	-	-
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	\$ 7,451,302	7,451,302	-	-	-
507 RENTS	OM507	PROFIX	\$ -	-	-	-	-
509 ALLOWANCES	OM509	Energy	\$ 429,682	-	429,682	-	-
Total Steam Power Operation Expenses			\$ 253,958,921	\$ 52,609,872	\$ 201,349,049	\$ -	\$ -
Steam Power Generation Maintenance Expenses							
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	\$ 3,631,867	-	3,631,867	-	-
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	\$ 3,346,806	3,346,806	-	-	-
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	\$ 30,113,309	-	30,113,309	-	-
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	\$ 6,251,804	-	6,251,804	-	-
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	\$ 877,364	877,364	-	-	-
Total Steam Power Generation Maintenance Expense			\$ 44,221,151	\$ 4,224,170	\$ 39,996,981	\$ -	\$ -
Total Steam Power Generation Expense			\$ 298,180,072	\$ 56,834,042	\$ 241,346,030	\$ -	\$ -

BIG RIVERS ELECTRIC CORPORATION
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October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Operation and Maintenance Expenses (Continued)</u>							
Other Power Generation Operation Expense							
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	\$ -	-	-	-	-
547 FUEL	OM547	Energy	\$ 706,789	-	706,789	-	-
548 GENERATION EXPENSE	OM548	PROFIX	\$ 34,608	34,608	-	-	-
549 MISC OTHER POWER GENERATION	OM549	PROFIX	\$ -	-	-	-	-
550 RENTS	OM550	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Expenses			\$ 741,396	\$ 34,608	\$ 706,789	\$ -	\$ -
Other Power Generation Maintenance Expense							
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	\$ -	-	-	-	-
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	\$ -	-	-	-	-
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	\$ 625,088	625,088	-	-	-
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Maintenance Expense			\$ 625,088	\$ 625,088	\$ -	\$ -	\$ -
Total Other Power Generation Expense			\$ 1,366,485	\$ 659,696	\$ 706,789	\$ -	\$ -
Total Station Expense			\$ 299,546,557	\$ 57,493,738	\$ 242,052,819	\$ -	\$ -

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12 Months Ended
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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Operation and Maintenance Expenses (Continued)</u>							
Other Power Supply Expenses							
555 PURCHASED POWER Energy	OM555	OMPP	\$ 19,466,790	-	19,466,790	-	-
555 PURCHASED POWER Demand	OMD555	OMPPD	\$ 4,210,045	4,210,045	-	-	-
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	\$ 58,293,374	13,175,571	45,117,803	-	-
555 PURCHASED POWER OPTIONS	OMO555	OMPP	\$ -	-	-	-	-
555 BROKERAGE FEES	OMB555	OMPP	\$ -	-	-	-	-
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	\$ -	-	-	-	-
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	\$ 909,422	909,422	-	-	-
557 OTHER EXPENSES	OM557	PROFIX	\$ 20,575,465	20,575,465	-	-	-
558 DUPLICATE CHARGES	OM558	Energy	\$ -	-	-	-	-
Total Other Power Supply Expenses	TPP		\$ 103,455,096	\$ 38,870,503	\$ 64,584,593	\$ -	\$ -
Total Electric Power Generation Expenses			\$ 403,001,653	\$ 96,364,241	\$ 306,637,411	\$ -	\$ -
Transmission Expenses							
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	\$ 876,815	-	-	-	876,815
561 LOAD DISPATCHING	OM561	LBTRAN	\$ 1,454,938	-	-	-	1,454,938
562 STATION EXPENSES	OM562	PTRAN	\$ 1,163,408	-	-	-	1,163,408
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	\$ 1,090,014	-	-	-	1,090,014
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	\$ 3,065,817	-	-	-	3,065,817
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	\$ 475,381	-	-	-	475,381
567 RENTS	OM567	PTRAN	\$ 24,701	-	-	-	24,701
568 MAINTENANCE SUPERVISION AND ENG	OM568	LBTRAN	\$ 647,227	-	-	-	647,227
569 STRUCTURES	OM569	PTRAN	\$ 26,913	-	-	-	26,913
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	\$ 1,936,760	-	-	-	1,936,760
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	\$ 2,876,462	-	-	-	2,876,462
572 UNDERGROUND LINES	OM572	PTRAN	\$ -	-	-	-	-
573 MISC PLANT	OM573	PTRAN	\$ 97,880	-	-	-	97,880
Total Transmission Expenses			\$ 13,736,318	\$ -	\$ -	\$ -	\$ 13,736,318
Distribution Operation Expense							
580 OPERATION SUPERVISION AND ENGI	OM580	LBDO	\$ -	-	-	-	-
581 LOAD DISPATCHING	OM581	PDIST	\$ -	-	-	-	-
582 STATION EXPENSES	OM582	PDIST	\$ -	-	-	-	-
583 OVERHEAD LINE EXPENSES	OM583	PDIST	\$ -	-	-	-	-
584 UNDERGROUND LINE EXPENSES	OM584	PDIST	\$ -	-	-	-	-
585 STREET LIGHTING EXPENSE	OM585	PDIST	\$ -	-	-	-	-
586 METER EXPENSES	OM586	PDIST	\$ -	-	-	-	-
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	PDIST	\$ -	-	-	-	-
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	PDIST	\$ -	-	-	-	-
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	\$ -	-	-	-	-
588 MISC DISTR EXP - MAPPIN	OM588x	PDIST	\$ -	-	-	-	-
589 RENTS	OM589	PDIST	\$ -	-	-	-	-
Total Distribution Operation Expense	OMDO		\$ -	\$ -	\$ -	\$ -	\$ -

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Exhibit Seelye-2

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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Operation and Maintenance Expenses (Continued)							
Distribution Maintenance Expense							
590 MAINTENANCE SUPERVISION AND EN	OM590	LBDM	\$ -	-	-	-	-
591 STRUCTURES	OM591	PDIST	\$ -	-	-	-	-
592 MAINTENANCE OF STATION EQUIPME	OM592	PDIST	\$ -	-	-	-	-
593 MAINTENANCE OF OVERHEAD LINES	OM593	PDIST	\$ -	-	-	-	-
594 MAINTENANCE OF UNDERGROUND LIN	OM594	PDIST	\$ -	-	-	-	-
595 MAINTENANCE OF LINE TRANSFORME	OM595	PDIST	\$ -	-	-	-	-
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	PDIST	\$ -	-	-	-	-
597 MAINTENANCE OF METERS	OM597	PDIST	\$ -	-	-	-	-
598 MISCELLANEOUS DISTRIBUTION EXPENSES	OM598	PDIST	\$ -	-	-	-	-
Total Distribution Maintenance Expense	OMDM		\$ -	\$ -	\$ -	\$ -	\$ -
Total Distribution Operation and Maintenance Expenses			-	-	-	-	-
Transmission and Distribution Expenses			13,736,318	-	-	-	13,736,318
Production, Transmission and Distribution Expenses	OMSUB		\$ 416,737,971	\$ 96,364,241	\$ 306,637,411	\$ -	\$ 13,736,318
Customer Accounts Expense							
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	\$ -	-	-	-	-
902 METER READING EXPENSES	OM902	F025	\$ -	-	-	-	-
903 RECORDS AND COLLECTION	OM903	F025	\$ -	-	-	-	-
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	\$ -	-	-	-	-
905 MISC CUST ACCOUNTS	OM903	F025	\$ -	-	-	-	-
Total Customer Accounts Expense	OMCA		\$ -	\$ -	\$ -	\$ -	\$ -
Customer Service Expense							
907 SUPERVISION	OM907	TUP	\$ -	-	-	-	-
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	\$ 591,192	517,058	-	-	74,133
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	\$ -	-	-	-	-
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	\$ -	-	-	-	-
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	\$ -	-	-	-	-
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	\$ -	-	-	-	-
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	\$ -	-	-	-	-
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	\$ -	-	-	-	-
913 ADVERTISING EXPENSES	OM913	TUP	\$ 488,103	426,897	-	-	61,206
915 MDSE-JOBING-CONTRACT	OM915	TUP	\$ -	-	-	-	-
916 MISC SALES EXPENSE	OM916	TUP	\$ -	-	-	-	-
Total Customer Service Expense	OMCS		\$ 1,079,295	\$ 943,955	\$ -	\$ -	\$ 135,340
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2		417,817,266	97,308,197	306,637,411	-	13,871,658

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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Operation and Maintenance Expenses (Continued)</u>							
Administrative and General Expense							
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	\$ 14,315,713	6,663,061	5,595,161	-	2,057,491
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	\$ 6,915,648	3,218,798	2,702,915	-	993,935
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	\$ -	-	-	-	-
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	\$ 3,954,189	1,840,425	1,545,457	-	568,306
924 PROPERTY INSURANCE	OM924	TUP	\$ -	-	-	-	-
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	\$ 179,889	83,727	70,308	-	25,854
926 EMPLOYEE BENEFITS	OM926	LBSUB9	\$ 169,663	78,967	66,311	-	24,384
927 FRANCHISE REQUIREMENTS	OM927	TUP	\$ -	-	-	-	-
928 REGULATORY COMMISSION FEES	OM928	TUP	\$ 1,188,958	1,039,867	-	-	149,091
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	\$ -	-	-	-	-
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	\$ 1,686,131	784,788	659,008	-	242,335
931 RENTS AND LEASES	OM931	PGP	\$ 1,933	1,694	-	-	239
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	\$ 208,156	182,450	-	-	25,706
Total Administrative and General Expense	OMAG		\$ 28,620,280	\$ 13,893,778	\$ 10,639,160	-	\$ 4,087,342
Total Operation and Maintenance Expenses	TOM		\$ 446,437,546	\$ 111,201,975	\$ 317,276,572	-	\$ 17,959,000
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP		\$ 224,914,919	\$ 111,201,975	\$ 95,753,945	-	\$ 17,959,000

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12 Months Ended
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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses							
Steam Power Generation Operation Expenses							
500 OPERATION SUPERVISION & ENGINEERING	LB500	PROFIX	\$ 4,967,667	4,967,667	-	-	-
501 FUEL	LB501	Energy	\$ 3,889,944	-	3,889,944	-	-
502 STEAM EXPENSES	LB502	PROFIX	\$ 9,023,322	9,023,322	-	-	-
505 ELECTRIC EXPENSES	LB505	PROFIX	\$ 4,523,897	4,523,897	-	-	-
506 MISC. STEAM POWER EXPENSES	LB506	PROFIX	\$ 940,518	940,518	-	-	-
507 RENTS	LB507	PROFIX	\$ -	-	-	-	-
509 ALLOWANCES	LB509	Energy	\$ -	-	-	-	-
Total Steam Power Operation Expenses	LBSUB1		\$ 23,345,348	\$ 19,455,404	\$ 3,889,944	\$ -	\$ -
Steam Power Generation Maintenance Expenses							
510 MAINTENANCE SUPERVISION & ENGINEERING	LB510	Energy	\$ 3,623,969	-	3,623,969	-	-
511 MAINTENANCE OF STRUCTURES	LB511	PROFIX	\$ 986,831	986,831	-	-	-
512 MAINTENANCE OF BOILER PLANT	LB512	Energy	\$ 8,700,235	-	8,700,235	-	-
513 MAINTENANCE OF ELECTRIC PLANT	LB513	Energy	\$ 1,595,642	-	1,595,642	-	-
514 MAINTENANCE OF MISC STEAM PLANT	LB514	PROFIX	\$ 200,886	200,886	-	-	-
Total Steam Power Generation Maintenance Expense	LBSUB2		\$ 15,107,564	\$ 1,187,718	\$ 13,919,846	\$ -	\$ -
Total Steam Power Generation Expense			\$ 38,452,913	\$ 20,643,122	\$ 17,809,791	\$ -	\$ -

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 October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses (Continued)							
Other Power Generation Operation Expense							
546 OPERATION SUPERVISION & ENGINEERING	LB546	PROFIX	\$ -	-	-	-	-
547 FUEL	LB547	Energy	\$ -	-	-	-	-
548 GENERATION EXPENSE	LB548	PROFIX	\$ -	-	-	-	-
549 MISC OTHER POWER GENERATION	LB549	PROFIX	\$ -	-	-	-	-
550 RENTS	LB550	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Expenses	LBSUB7		\$ -	\$ -	\$ -	\$ -	\$ -
Other Power Generation Maintenance Expense							
551 MAINTENANCE SUPERVISION & ENGINEERING	LB551	PROFIX	\$ -	-	-	-	-
552 MAINTENANCE OF STRUCTURES	LB552	PROFIX	\$ -	-	-	-	-
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB553	PROFIX	\$ 89,555	89,555	-	-	-
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	LB554	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Maintenance Expense	LBSUB8		\$ 89,555	\$ 89,555	\$ -	\$ -	\$ -
Total Other Power Generation Expense			\$ 89,555	\$ 89,555	\$ -	\$ -	\$ -
Total Production Expense	LPREX		\$ 38,542,468	\$ 20,732,677	\$ 17,809,791	\$ -	\$ -

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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses (Continued)							
Purchased Power							
555 PURCHASED POWER Energy	LB555	OMPP	\$ -	-	-	-	-
555 PURCHASED POWER Demand	LBD555	OMPPD	\$ -	-	-	-	-
555 PURCHASED POWER OPTIONS	LBO555	OMPP	\$ -	-	-	-	-
555 BROKERAGE FEES	LBB555	OMPP	\$ -	-	-	-	-
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	\$ -	-	-	-	-
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	\$ -	-	-	-	-
557 OTHER EXPENSES	LB557	PROFIX	\$ -	-	-	-	-
558 DUPLICATE CHARGES	LB558	Energy	\$ -	-	-	-	-
Total Purchased Power Labor	LBPP		\$ -	\$ -	\$ -	\$ -	\$ -
Transmission Labor Expenses							
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	\$ 835,977	-	-	-	835,977
561 LOAD DISPATCHING	LB561	PTRAN	\$ 1,304,969	-	-	-	1,304,969
562 STATION EXPENSES	LB562	PTRAN	\$ 598,382	-	-	-	598,382
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	\$ 236,393	-	-	-	236,393
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	\$ -	-	-	-	-
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	\$ 312,375	-	-	-	312,375
567 RENTS	LB567	PTRAN	\$ -	-	-	-	-
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	\$ 644,925	-	-	-	644,925
569 MAINTENACE OF STRUCTURES	LB569	PTRAN	\$ 318	-	-	-	318
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	\$ 1,433,304	-	-	-	1,433,304
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	\$ 1,067,766	-	-	-	1,067,766
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	\$ 46,439	-	-	-	46,439
Total Transmission Labor Expenses	LBTRAN		\$ 6,480,848	\$ -	\$ -	\$ -	\$ 6,480,848
Distribution Operation Labor Expense							
580 OPERATION SUPERVISION AND ENGI	LB580	F023	\$ -	-	-	-	-
581 LOAD DISPATCHING	LB581	PDIST	\$ -	-	-	-	-
582 STATION EXPENSES	LB582	PDIST	\$ -	-	-	-	-
583 OVERHEAD LINE EXPENSES	LB583	PDIST	\$ -	-	-	-	-
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	\$ -	-	-	-	-
585 STREET LIGHTING EXPENSE	LB585	PDIST	\$ -	-	-	-	-
586 METER EXPENSES	LB586	PDIST	\$ -	-	-	-	-
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	\$ -	-	-	-	-
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	\$ -	-	-	-	-
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	\$ -	-	-	-	-
589 RENTS	LB589	PDIST	\$ -	-	-	-	-
Total Distribution Operation Labor Expense	LBDO		\$ -	\$ -	\$ -	\$ -	\$ -

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Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses (Continued)							
Distribution Maintenance Labor Expense							
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	\$ -	-	-	-	-
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	\$ -	-	-	-	-
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	\$ -	-	-	-	-
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	\$ -	-	-	-	-
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	\$ -	-	-	-	-
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	\$ -	-	-	-	-
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	\$ -	-	-	-	-
597 MAINTENANCE OF METERS	LB597	PDIST	\$ -	-	-	-	-
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	\$ -	-	-	-	-
Total Distribution Maintenance Labor Expense	LBDM		\$ -	\$ -	\$ -	\$ -	\$ -
Total Distribution Operation and Maintenance Labor Expenses		PDIST	-	-	-	-	-
Transmission and Distribution Labor Expenses			6,480,848	-	-	-	6,480,848
Production, Transmission and Distribution Labor Expenses	LBSUB		\$ 45,023,316	\$ 20,732,677	\$ 17,809,791	\$ -	\$ 6,480,848
Customer Accounts Expense							
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	\$ -	-	-	-	-
902 METER READING EXPENSES	LB902	F025	\$ -	-	-	-	-
903 RECORDS AND COLLECTION	LB903	F025	\$ -	-	-	-	-
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	\$ -	-	-	-	-
905 MISC CUST ACCOUNTS	LB903	F025	\$ -	-	-	-	-
Total Customer Accounts Labor Expense	LBCA		\$ -	\$ -	\$ -	\$ -	\$ -
Customer Service Expense							
907 SUPERVISION	LB907	TUP	\$ -	-	-	-	-
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	\$ 544,608	476,316	-	-	68,292
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	\$ -	-	-	-	-
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	\$ -	-	-	-	-
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	\$ -	-	-	-	-
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	\$ -	-	-	-	-
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	\$ -	-	-	-	-
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	\$ -	-	-	-	-
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	\$ -	-	-	-	-
915 MDSE-JOBING-CONTRACT	LB915	TUP	\$ -	-	-	-	-
916 MISC SALES EXPENSE	LB916	TUP	\$ -	-	-	-	-
Total Customer Service Labor Expense	LBCS		\$ 544,608	\$ 476,316	\$ -	\$ -	\$ 68,292
Sub-Total Labor Exp	LBSUB9		45,567,924	21,208,994	17,809,791	-	6,549,140

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses (Continued)							
Administrative and General Expense							
920 ADMIN. & GEN. SALARIES-	LB920	LBSUB9	\$ 14,315,714	6,663,061	5,595,161	-	2,057,491
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB9	\$ -	-	-	-	-
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB922	LBSUB9	\$ -	-	-	-	-
923 OUTSIDE SERVICES EMPLOYED	LB923	LBSUB9	\$ -	-	-	-	-
924 PROPERTY INSURANCE	LB924	TUP	\$ -	-	-	-	-
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB9	\$ 27,509	12,804	10,752	-	3,954
926 EMPLOYEE BENEFITS	LB926	LBSUB9	\$ 17,136	7,976	6,698	-	2,463
928 REGULATORY COMMISSION FEES	LB928	TUP	\$ -	-	-	-	-
929 DUPLICATE CHARGES-CR	LB929	LBSUB9	\$ -	-	-	-	-
930 MISCELLANEOUS GENERAL EXPENSES	LB930	LBSUB9	\$ -	-	-	-	-
931 RENTS AND LEASES	LB931	PGP	\$ -	-	-	-	-
935 MAINTENANCE OF GENERAL PLANT	LB935	PGP	\$ 74,927	65,674	-	-	9,253
Total Administrative and General Expense	LBAG		\$ 14,435,286	\$ 6,749,515	\$ 5,612,610	\$ -	\$ 2,073,161
Total Operation and Maintenance Expenses	TLB		\$ 60,003,210	\$ 27,958,509	\$ 23,422,401	\$ -	\$ 8,622,301
Operation and Maintenance Expenses Less Purchase Power	LBLPP		\$ 60,003,210	\$ 27,958,509	\$ 23,422,401	\$ -	\$ 8,622,301

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Other Expenses</u>							
Depreciation Expenses							
Production	DEPRDP2	PPROD	\$ 28,815,395	28,815,395	-	-	-
Transmission	DEPRDP3	PTRAN	\$ 5,182,459	-	-	-	5,182,459
Transmission	DEPRDP4	PTRAN	\$ -	-	-	-	-
Distribution	DEPRDP5	PDIST	\$ -	-	-	-	-
General & Common Plant	DEPRDP6	PGP	\$ 238,155	208,744	-	-	29,411
Other Plant	DEPROTH	TPIS	\$ -	-	-	-	-
Total Depreciation Expense	TDEPR		\$ 34,236,009	29,024,140	-	-	5,211,869
Accretion Expense							
Production	ACRTNP	F017	\$ -	-	-	-	-
Transmission	ACRTNT	PTRAN	\$ -	-	-	-	-
Distribution	ACRTND	PDIST	\$ -	-	-	-	-
Total Accretion Expense	TACRTN		\$ -	\$ -	\$ -	\$ -	\$ -
Property Taxes & Other	PTAX	TUP	\$ (94,563)	(82,705)	-	-	(11,858)
Amortization of Investment Tax Credit	OTAX	TUP	\$ -	-	-	-	-
Other Expenses	OT	TUP	\$ (365,864)	(319,986)	-	-	(45,878)
Interest	INTLTD	TUP	\$ 47,622,710	41,650,995	-	-	5,971,715
Other Deductions	DEDUCT	TUP	\$ 109,257	95,557	-	-	13,700
Total Other Expenses	TOE		\$ 81,507,549	\$ 70,368,000	\$ -	\$ -	\$ 11,139,549
Total Cost of Service (O&M + Other Expenses)			\$ 527,945,095	\$ 181,569,975	\$ 317,276,572	\$ -	\$ 29,098,548

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Functional Vectors							
Production Plant	F001		1.000000	1.000000	0.000000	0.000000	0.000000
Transmission Plant	F002		1.000000	0.000000	0.000000	0.000000	1.000000
Distribution Plant	F003		1.000000	0.000000	0.000000	0.000000	1.000000
Production Plant	F017		1.000000	0.000000	1.000000	0.000000	0.000000
Provar	PROVAR		1.000000	0.000000	1.000000	0.000000	0.000000
PROFIX	PROFIX		1.000000	1.000000	0.000000	0.000000	0.000000
Distribution Operation Labor	F023		-	-	-	-	-
Distribution Maintenance Labor	F024		-	-	-	-	-
Customer Accounts Expense	F025		1.000000	0.000000	0.000000	0.000000	1.000000
Customer Service Expense	F026		1.000000	0.000000	0.000000	0.000000	1.000000
Purchased Power Energy	OMPP		1.000000	0.000000	1.000000	0.000000	0.000000
Purchased Power Demand	OMPPD		1.000000	1.000000	0.000000	0.000000	0.000000
Purchased Power BREC Share of HMP&L Station Two	OMPPH		58,293,374	13,175,571	45,117,803	0.000000	0.000000
Production Energy	Energy		1.000000	0.000000	1.000000	0.000000	0.000000
Internally Generated Functional Vectors							
Total Prod, Trans, and Dist Plant	PT&D		1.000000	0.876506	-	-	0.123494
Total Transmission Plant	PTRAN		1.000000	-	-	-	1.000000
Operation and Maintenance Expenses Less Purchase Power	OMLPP		1.000000	0.494418	0.425734	-	0.079848
Total Plant in Service	TPIS		1.000000	0.876506	-	-	0.123494
Total Operation and Maintenance Expenses (Labor)	TLB		1.000000	0.465950	0.390352	-	0.143697
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2		1.000000	0.232897	0.733903	-	0.033200
Total Steam Power Operation Expenses (Labor)	LBSUB1		1.000000	0.833374	0.166626	-	-
Total Steam Power Generation Maintenance Expense (Labor)	LBSUB2		1.000000	0.078617	0.921383	-	-
Total Transmission Labor Expenses	LBTRAN		1.000000	-	-	-	1.000000
Sub-Total Labor Exp	LBSUB7		1.000000	0.465437	0.390841	-	0.143723
Total General Plant	PGP		1.000000	0.876506	-	-	0.123494
Total Production Plant	PPROD		1.000000	1.000000	-	-	-
Total Intangible Plant	INTPLT		1.000000	0.876506	-	-	0.123494

BIG RIVERS ELECTRIC CORPORATION
 Cost of Service Study
 Rate Schedule Allocation
 12 Months Ended
 October 2010
 6 CP - Smelter TIER Adjustment - Revenues @ \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Cost of Service Summary – Unadjusted							
Operating Revenues							
Sales to Members		REVUC	R01	\$ 110,934,700	\$ 39,110,620	\$ 282,406,135	\$ 432,451,455
Off System Sales Revenue			OSSALL	\$ 12,751,365	\$ 4,563,381	\$ 59,229,055	\$ 76,543,801
Income from Leased Property Net			OTHREV	\$ 49,919	\$ 12,329	\$ 87,424	\$ 149,673
Other Operating Revenue & Income			OTHREV	\$ 4,595,526	\$ 1,135,019	\$ 8,048,200	\$ 13,778,745
Total Operating Revenues			TOR	\$ 128,331,510	\$ 44,821,350	\$ 349,770,815	\$ 522,923,675
Operating Expenses							
Operation and Maintenance Expenses				\$ 120,514,880	\$ 39,518,059	\$ 286,404,608	\$ 446,437,546
Depreciation and Amortization Expenses				\$ 11,430,505	\$ 2,820,170	\$ 19,985,334	\$ 34,236,009
Property and Other Taxes			NPT	\$ (31,650)	\$ (7,782)	\$ (55,131)	\$ (94,563)
Total Operating Expenses			TOE	\$ 131,913,735	\$ 42,330,446	\$ 306,334,811	\$ 480,578,992
Utility Operating Margin				\$ (3,582,224)	\$ 2,490,903	\$ 43,436,004	\$ 42,344,683
Non-Operating Items							
Interest Income			RBPLT	\$ -	\$ -	\$ -	\$ -
Other Non-Operating Income			RBPLT	\$ -	\$ -	\$ -	\$ -
Other Credits			RBPLT	\$ -	\$ -	\$ -	\$ -
Interest on Long Term Debt				\$ -	\$ -	\$ -	\$ -
Other Interest Expense			RBPLT	\$ -	\$ -	\$ -	\$ -
Other Deductions			RBPLT	\$ -	\$ -	\$ -	\$ -
Total Non-Operating Items				\$ -	\$ -	\$ -	\$ -
Net Utility Operating Margin			TOM	\$ (3,582,224)	\$ 2,490,903	\$ 43,436,004	\$ 42,344,683
Net Cost Rate Base				\$ 390,335,625	\$ 96,406,419	\$ 683,599,459	\$ 1,170,341,502

BIG RIVERS ELECTRIC CORPORATION

Cost of Service Study

Rate Schedule Allocation

12 Months Ended

October 2010

6 CP - Smelter TIER Adjustment - Revenues @ \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Cost of Service Summary -- Pro-Forma							
Operating Revenues							
Total Operating Revenue				\$ 128,331,510	\$ 44,821,350	\$ 349,770,815	\$ 522,923,675
Pro-Forma Adjustments:							
To annualize revenue for new industrial customer	2.01			\$ -	\$ 149,752	\$ -	\$ 149,752
To adjust mismatch in fuel cost recovery	2.02	FACREV		\$ (25,166,503)	\$ (9,525,471)	\$ (73,123,203)	\$ (107,815,177)
To eliminate Environmental Surcharge revenues	2.03	ESREV		\$ (5,315,462)	\$ (2,025,233)	\$ (15,493,538)	\$ (22,834,232)
To reflect temperature normalized sales volumes	2.04		EnergyR	\$ (421,610)	\$ -	\$ -	\$ (421,610)
To eliminate Non-FAC PPA revenues	2.05	NFPR		\$ 2,757,108	\$ 1,045,800	\$ 7,785,109	\$ 11,588,017
To eliminate WKEC Lease Expenses	2.19		RBPLT	\$ (49,919)	\$ (12,329)	\$ (87,424)	\$ (149,673)
To eliminate RRI Domtar Cogen Backup revenues	2.09			\$ -	\$ (1,115,159)	\$ -	\$ (1,115,159)
To adjust for Smelter TIER Adjustment Charge	2.22			\$ -	\$ -	\$ -	\$ -
Total Pro-Forma Operating Revenue				\$ 100,135,124	\$ 33,338,709	\$ 268,851,759	\$ 402,325,592

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Rate Schedule Allocation
12 Months Ended
October 2010
6 CP - Smelter TIER Adjustment - Revenues @ \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Cost of Service Summary – Pro-Forma							
Operating Expenses							
Operation and Maintenance Expenses				\$ 120,514,880	\$ 39,518,059	\$ 286,404,608	\$ 446,437,546
Depreciation and Amortization Expenses				\$ 11,430,505	\$ 2,820,170	\$ 19,985,334	\$ 34,236,009
Property and Other Taxes			NPT	\$ (31,650)	\$ (7,782)	\$ (55,131)	\$ (94,563)
Adjustments to Operating Expenses:							
To annualize expenses for new industrial customer	2.01			\$ -	\$ 110,607	\$ -	\$ 110,607
To adjust mismatch in fuel cost recovery	2.02		FACREV	\$ (25,685,949)	\$ (9,722,081)	\$ (74,632,493)	\$ (110,040,523)
To eliminate Environmental Surcharge expenses	2.03		ESREV	\$ (5,462,944)	\$ (2,081,425)	\$ (15,923,422)	\$ (23,467,791)
To reflect weather normalized sales volumes	2.04		EnergyR	\$ (295,293)	\$ -	\$ -	\$ (295,293)
To eliminate Non-FAC PPA expenses	2.05		NFPR	\$ 2,858,740	\$ 1,084,350	\$ 8,072,083	\$ 12,015,173
To reflect annualized depreciation expenses	2.06		PLT	\$ 2,093,093	\$ 514,548	\$ 3,645,010	\$ 6,252,651
To reflect increases in labor and labor-related costs	2.07		LBPLT	\$ 183,165	\$ 53,069	\$ 388,660	\$ 624,894
To reflect current interest on construction (CWIP)	2.08		PLT	\$ 172,654	\$ 42,444	\$ 300,669	\$ 515,767
To eliminate RRI Domtar Cogen Backup expenses	2.09			\$ -	\$ (2,086,416)	\$ -	\$ (2,086,416)
To reflect levelized production expenses	2.10		CP	\$ 1,916,312	\$ 463,846	\$ 3,280,520	\$ 5,660,678
To reflect levelized production expenses	2.11		CP	\$ 923,161	\$ 223,452	\$ 1,580,352	\$ 2,726,965
To reflect going forward Information Technology support services	2.12		RBPLT	\$ 97,453	\$ 24,069	\$ 170,671	\$ 292,194
To reflect amortization of rate case expenses	2.13		RBPLT	\$ 93,960	\$ 23,206	\$ 164,553	\$ 281,719
To reflect MISO related expenses	2.14		12CPTR	\$ 1,667,501	\$ 459,102	\$ 3,288,398	\$ 5,415,000
To annualize interest on long-term debt	2.15		RBPLT	\$ 23,483	\$ 5,800	\$ 41,125	\$ 70,408
To reflect leased property income (Soaper Building Rent)	2.16		LBPLT	\$ (37,626)	\$ (10,902)	\$ (79,840)	\$ (128,368)
To adjust for costs related to LEM Dispatch	2.17		CP	\$ (317,140)	\$ (76,764)	\$ (542,910)	\$ (936,815)
To adjust for costs related to APM	2.18		CP	\$ 69,429	\$ 16,805	\$ 118,855	\$ 205,090
To reflect going forward level of Outside Services	2.25		EnergyNS	\$ (725,000)	\$ (275,000)	\$ -	\$ (1,000,000)
To eliminate costs for SFPC membership	2.20		RBPLT	\$ (60,293)	\$ (14,891)	\$ (105,591)	\$ (180,775)
To adjust for MISO Case-related expenses	2.21		12CPTR	\$ (237,459)	\$ (65,378)	\$ (468,281)	\$ (771,118)
To reflect commitment to Energy Efficiency Programs	2.26		EnergyNS	\$ 725,000	\$ 275,000	\$ -	\$ 1,000,000
To eliminate promo advertising, lobbying, donation and econ dev	2.23		R01	\$ (130,114)	\$ (45,872)	\$ (331,230)	\$ (507,216)
To reflect going forward level of income taxes	2.24		NTPLT	\$ 61,251	\$ 15,070	\$ 106,763	\$ 183,084
Total Expense Adjustments				\$ (22,066,615)	\$ (11,067,360)	\$ (70,926,109)	\$ (104,060,084)
Total Operating Expenses			TOE	\$ 109,847,120	\$ 31,263,086	\$ 235,408,702	\$ 376,518,908
Utility Operating Margins – Pro-Forma				\$ (9,711,995)	\$ 2,075,623	\$ 33,443,057	\$ 25,806,684
Non-Operating Items				\$ -	\$ -	\$ -	\$ -
Total Non-Operating Items				\$ -	\$ -	\$ -	\$ -
Net Utility Operating Margin				\$ (9,711,995)	\$ 2,075,623	\$ 33,443,057	\$ 25,806,684
Net Cost Rate Base				\$ 390,335,625	\$ 96,406,419	\$ 683,599,459	\$ 1,170,341,502
Return on Rate Base – Utility Operating Margin Divided by Rate Base				-2.49%	2.15%	4.89%	2.21%

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Rate Schedule Allocation
12 Months Ended
October 2010
6 CP - Smelter TIER Adjustment - Revenues @ \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Subsidies Paid and Received at Present Rates							
(subsidies received shown as positive value)							
Rate Base				\$ 390,335,625	\$ 96,406,419	\$ 683,599,459	\$ 1,170,341,502
Operating Margins (present rates)				\$ (9,711,995)	\$ 2,075,623	\$ 33,443,057	\$ 25,806,684
Operating Margins at Equal Rate of Return	ROR	2.21%		\$ 8,607,119	\$ 2,125,815	\$ 15,073,750	\$ 25,806,684
Subsidies Paid and Received				\$ 18,319,114	\$ 50,193	\$ (18,369,307)	\$ 0

Big Rivers Electric Corporation
 Summary of Cost of Service Study
 For the 12 Months Ended October 2010

Rate of Return Summary

Unadjusted

Rate Schedule		Utility Operating Margins		Net Cost Rate Base	Rate of Return
Total Rural	\$	(9,711,995)	\$	390,335,625	-2.49%
Total Large Industrial		2,075,623		96,406,419	2.15%
Total Smelter		33,443,057		683,599,459	4.89%
Total	\$	25,806,684	\$	1,170,341,502	2.21%

Adjusted for Proposed Rate Increase

Rate Schedule		Utility Operating Margins		Net Cost Rate Base	Rate of Return
Total Rural	\$	4,460,008	\$	390,335,625	1.14%
Total Large Industrial		5,304,189		96,406,419	5.50%
Total Smelter		55,996,452		683,599,459	8.19%
Total	\$	65,760,649	\$	1,170,341,502	5.62%

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
<u>Plant in Service</u>								
Intangible Plant	INTPLT	PT&D	\$ 66,895					
Production Plant	PPROD	F001	\$ 1,686,796,955					
Transmission Plant	PTRAN	F002	\$ 237,659,206					
Distribution Plant	PDIST	F003	\$ -					
Total Production & Transmission Plant	PT&D		1,924,456,160					
General Plant	PGP	PT&D	\$ 18,511,051					
Total Plant in Service	TPIS		\$ 1,943,034,107					
<u>Construction Work in Progress (CWIP)</u>								
CWIP Production	CWIP1	PPROD	\$ 22,411,274					
CWIP Transmission	CWIP2	PTRAN	\$ 7,475,859					
CWIP Distribution Plant	CWIP3	PDIST	\$ -					
CWIP General Plant	CWIP4	PT&D	\$ 16,915,005					
Total Construction Work in Progress	TCWIP		\$ 46,802,138					
Total Utility Plant			\$ 1,989,836,245					
<u>Rate Base</u>								
Total Utility Plant	TUP		\$ 1,989,836,245					
<u>Less: Accumulated Provision for Depreciation</u>								
Production	ADEPREPA	PPROD	\$ 790,847,523					
Transmission	ADEPRTP	PTRAN	\$ 107,564,747					
Distribution	ADEPRD11	PDIST	\$ -					
General & Common Plant	ADEPRD12	PT&D	\$ 6,300,770					
Intangible, Misc, and Other Plant	ADEPRGP	PT&D	\$ -					
Retirement Work In Progress	ADEPRRT	PT&D	\$ -					
Total Accumulated Depreciation	TADEPR		\$ 904,713,040					
Net Utility Plant	NTPLANT		\$ 1,085,123,206					
<u>Working Capital</u>								
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP	\$ 28,114,365					
Materials and Supplies	M&S	TPIS	\$ 22,777,820	20327197.9	85340.04	-68898.4	208485.44	-95121.11
Fuel Stock	PREPAY	TPIS	\$ 34,326,112	39158400.85	-1328756.9	-4130766.79	-359777.13	1918732.52
Total Working Capital	TWC		\$ 85,218,297					
Net Rate Base	RB		\$ 1,170,341,502					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
<u>Plant in Service</u>								
Intangible Plant	INTPLT	PT&D						
Production Plant	PPROD	F001						
Transmission Plant	PTRAN	F002						
Distribution Plant	PDIST	F003						
Total Production & Transmission Plant	PT&D							
General Plant	PGP	PT&D						
Total Plant in Service	TPIS							
<u>Construction Work in Progress (CWIP)</u>								
CWIP Production	CWIP1	PPROD						
CWIP Transmission	CWIP2	PTRAN						
CWIP Distribution Plant	CWIP3	PDIST						
CWIP General Plant	CWIP4	PT&D						
Total Construction Work in Progress	TCWIP							
Total Utility Plant								
<u>Rate Base</u>								
Total Utility Plant	TUP							
<u>Less: Accumulated Provision for Depreciation</u>								
Production	ADEPREPA	PPROD						
Transmission	ADEPRTP	PTRAN						
Distribution	ADEPRD11	PDIST						
General & Common Plant	ADEPRD12	PT&D						
Intangible, Misc, and Other Plant	ADEPRGP	PT&D						
Retirement Work In Progress	ADEPRRT	PT&D						
Total Accumulated Depreciation	TADEPR							
<u>Net Utility Plant</u>	NTPLANT							
<u>Working Capital</u>								
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP						
Materials and Supplies	M&S	TPIS	-220183.19	207004.7	357212.07	240129.05	-144241.07	2889566.56
Fuel Stock	PREPAY	TPIS	2552249.61	867432.81	-287963.1	-3463026.24	-2018344.81	-578882.38
Total Working Capital	TWC							
Net Rate Base	RB							

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
<u>Plant in Service</u>			
Intangible Plant	INTPLT	PT&D	
Production Plant	PPROD	F001	
Transmission Plant	PTRAN	F002	
Distribution Plant	PDIST	F003	
Total Production & Transmission Plant	PT&D		
General Plant	PGP	PT&D	
Total Plant in Service	TPIS		
<u>Construction Work in Progress (CWIP)</u>			
CWIP Production	CWIP1	PPROD	
CWIP Transmission	CWIP2	PTRAN	
CWIP Distribution Plant	CWIP3	PDIST	
CWIP General Plant	CWIP4	PT&D	
Total Construction Work in Progress	TCWIP		
Total Utility Plant			
<u>Rate Base</u>			
Total Utility Plant	TUP		
<u>Less: Accumulated Provision for Depreciation</u>			
Production	ADEPREPA	PPROD	
Transmission	ADEPRTP	PTRAN	
Distribution	ADEPRD11	PDIST	
General & Common Plant	ADEPRD12	PT&D	
Intangible, Misc, and Other Plant	ADEPRGP	PT&D	
Retirement Work In Progress	ADEPRRT	PT&D	
Total Accumulated Depreciation	TADEPR		
Net Utility Plant	NTPLANT		
<u>Working Capital</u>			
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP	
Materials and Supplies	M&S	TPIS	-1008672.24
Fuel Stock	PREPAY	TPIS	1996813.82
Total Working Capital	TWC		
Net Rate Base	RB		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Operation and Maintenance Expenses								
Steam Power Generation Operation Expenses								
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	\$ 4,974,566	342962.62	1034901.09	358703.86	318491.34	384828.47
501 FUEL	OM501	Energy	\$ 200,919,367	11957675.62	16736745.89	19103323.18	17630280.19	17173097.35
502 STEAM EXPENSES	OM502	PROFIX	\$ 34,453,882	2424633.22	2490999.61	2647322.04	2676616.85	2911578.89
505 ELECTRIC EXPENSES	OM505	PROFIX	\$ 5,730,122	399261.19	656713.94	477935.99	489102.92	443771.24
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	\$ 7,451,302	837237.41	458663.32	531778.12	516078.68	646116.36
507 RENTS	OM507	PROFIX	\$ -		0	0	0	0
509 ALLOWANCES	OM509	Energy	\$ 429,682		0	0	55382.46	42291.31
Total Steam Power Operation Expenses			\$ 253,958,921	\$ 7,775	\$ 146,296	\$ 7,154	\$ 15,852	\$ 21,245
Steam Power Generation Maintenance Expenses								
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	\$ 3,631,867	301562.96	282674.01	282136.07	286174.73	324812.85
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	\$ 3,346,806	-2396.3	561809.41	164027.98	219884.17	122851.74
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	\$ 30,113,309	2665049.9	2707987.08	1617573	1413359.02	2039706.29
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	\$ 6,251,804	2443905.77	804364.44	-26124.91	190619.56	167015.92
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	\$ 877,364	136355.09	154030.5	71461.85	48046.95	35868.33
Total Steam Power Generation Maintenance Expense			\$ 44,221,151	\$ 3,659	\$ 7,366	\$ 1,455	\$ 6,057	\$ 9,772
Total Steam Power Generation Expense			\$ 298,180,072					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Operation and Maintenance Expenses								
Steam Power Generation Operation Expenses								
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	338223.38	414283.22	372420.21	359404.38	369945.71	334708.35
501 FUEL	OM501	Energy	15868543.13	15412621.99	16949864.35	18643264.65	19588180.27	17004762.52
502 STEAM EXPENSES	OM502	PROFIX	2801318.34	3017168.8	3110448.48	3022221.22	3095094.21	3132173.1
505 ELECTRIC EXPENSES	OM505	PROFIX	430459.27	473960.9	440316.02	456264.08	479912.75	476352.39
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	557984.26	577686.56	640171.09	585642.46	806920.28	725866.29
507 RENTS	OM507	PROFIX	0	0	0	0	0	0
509 ALLOWANCES	OM509	Energy	33437.63	31618.94	46952.89	62169.21	49573.1	28256.05
Total Steam Power Operation Expenses			\$ 6,070	\$ 8,052	\$ 5,213	\$ 267,644	\$ 167,124	\$ 44,089
Steam Power Generation Maintenance Expenses								
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	297530.92	289425	297802.77	281476.85	309430.59	294029.27
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	153063.03	309779.07	306987.02	458108.12	372678.29	488354.6
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	1740181.45	2535024.61	2164789.64	2054585.86	2034329.79	2855272.84
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	313812.24	389518.49	251988.71	302199.64	422000.23	534239.62
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	61896.28	58285.06	85932.24	51800.09	89344.85	66090.33
Total Steam Power Generation Maintenance Expense			\$ (325)	\$ 4,943	\$ 216,501	\$ 175,754	\$ 65,241	\$ 96,186
Total Steam Power Generation Expense								

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
<u>Operation and Maintenance Expenses</u>			
Steam Power Generation Operation Expenses			
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	345693.85
501 FUEL	OM501	Energy	14851007.4
502 STEAM EXPENSES	OM502	PROFIX	3124307.14
505 ELECTRIC EXPENSES	OM505	PROFIX	506051.44
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	567156.95
507 RENTS	OM507	PROFIX	0
509 ALLOWANCES	OM509	Energy	80000.79
Total Steam Power Operation Expenses			\$ 44,882
Steam Power Generation Maintenance Expenses			
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	384811.34
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	191658.45
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	6285449.98
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	458264.77
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	18252.47
Total Steam Power Generation Maintenance Expense			\$ 38,478
Total Steam Power Generation Expense			

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Operation and Maintenance Expenses (Continued)								
Other Power Generation Operation Expense								
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	\$ -	0	0	0	0	0
547 FUEL	OM547	Energy	\$ 706,789	7379.85	135814.53	4779.27	13479.11	18872.46
548 GENERATION EXPENSE	OM548	PROFIX	\$ 34,608	394.54	10481.32	2375	2373	2373
549 MISC OTHER POWER GENERATION	OM549	PROFIX	\$ -	0	0	0	0	0
550 RENTS	OM550	PROFIX	\$ -	0	0	0	0	0
Total Other Power Generation Expenses			\$ 741,396	\$ (1)	\$ (0)	\$ 0	\$ 1	\$ 0
Other Power Generation Maintenance Expense								
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	\$ -	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	\$ -	0	0	0	0	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	\$ 625,088	3658.66	7365.41	1454.85	6056.77	9772.16
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	\$ -	0	0	0	0	0
Total Other Power Generation Maintenance Expense			\$ 625,088	\$ 0	\$ (0)	\$ (0)	\$ 0	\$ 0
Total Other Power Generation Expense			\$ 1,366,485					
Total Station Expense			\$ 299,546,557					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
<u>Operation and Maintenance Expenses (Continued)</u>								
Other Power Generation Operation Expense								
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	0	0	0	0	0	0
547 FUEL	OM547	Energy	3696.82	5679.30	2839.60	265271.41	164750.42	41716.70
548 GENERATION EXPENSE	OM548	PROFIX	2373	2373.00	2373.00	2373.00	2373.00	2373.00
549 MISC OTHER POWER GENERATION	OM549	PROFIX	0	0	0	0	0	0
550 RENTS	OM550	PROFIX	0	0	0	0	0	0
Total Other Power Generation Expenses			\$ (0)	\$ 1	\$ (0)	\$ 0	\$ (0)	\$ 0
Other Power Generation Maintenance Expense								
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	0	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	0	0	0	0	0	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	-322.62	4943.09	216501.24	175754.02	65240.65	96186.42
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	0	0	0	0	0	0
Total Other Power Generation Maintenance Expense			\$ 2	\$ 0	\$ 1	\$ (0)	\$ (1)	\$ 0
Total Other Power Generation Expense								
Total Station Expense								

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
<u>Operation and Maintenance Expenses (Continued)</u>			
Other Power Generation Operation Expense			
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	0
547 FUEL	OM547	Energy	42509.14
548 GENERATION EXPENSE	OM548	PROFIX	2373.00
549 MISC OTHER POWER GENERATION	OM549	PROFIX	0
550 RENTS	OM550	PROFIX	0
Total Other Power Generation Expenses			\$ (0)
Other Power Generation Maintenance Expense			
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	0
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	38477.63
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	0
Total Other Power Generation Maintenance Expense			\$ (0)
Total Other Power Generation Expense			
Total Station Expense			

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Operation and Maintenance Expenses (Continued)								
Other Power Supply Expenses								
555 PURCHASED POWER Energy	OM555	OMPP	\$ 19,466,790	3,827,952.61	2,536,760.36	1,913,169.62	941,370.11	911,294.71
555 PURCHASED POWER Demand	OMD555	OMPPD	\$ 4,210,045	350,837.07	350,837.07	350,837.07	350,837.07	350,837.07
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	\$ 58,293,374	4,582,937.26	5,054,161.64	4,549,698.12	4,432,913.73	4,763,164.98
555 PURCHASED POWER OPTIONS	OMO555	OMPP	\$ -	0	0	0	0	0
555 BROKERAGE FEES	OMB555	OMPP	\$ -	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	\$ -	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	\$ 909,422	143177.05	161775.92	84110.82	66492.87	77558.07
557 OTHER EXPENSES	OM557	PROFIX	\$ 20,575,465	2479520.29	2210820.92	1519858.99	1381956.22	1577347.72
558 DUPLICATE CHARGES	OM558	Energy	\$ -	0	0	0	0	0
Total Other Power Supply Expenses	TPP		\$ 103,455,096	11,384,424.28	10,314,355.91	8,417,674.62	7,173,570.00	7,680,202.55
Total Electric Power Generation Expenses			\$ 403,001,653					
Transmission Expenses								
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	\$ 876,815	159722.72	99111.49	64131.05	56493.74	71626.61
561 LOAD DISPATCHING	OM561	LBTRAN	\$ 1,454,938	245368.38	141741.21	113777.21	98967.65	113022.44
562 STATION EXPENSES	OM562	PTRAN	\$ 1,163,408	138650.41	111166.28	70289.35	78900.11	96317.14
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	\$ 1,090,014	116902.84	72507.66	91764.75	90248.86	92136.75
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	\$ 3,065,817	227372.33	270804.44	222495.76	313990.87	298157.74
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	\$ 475,381	82941.08	54676.78	40839.08	35322.18	39484.82
567 RENTS	OM567	PTRAN	\$ 24,701	2058.43	2058.43	2058.43	2058.43	2058.43
568 MAINTENACE SUPERVISION AND ENG	OM568	LBTRAN	\$ 647,227	120702.88	66051.02	48367.7	40149.83	53439.26
569 STRUCTURES	OM569	PTRAN	\$ 26,913	36.88	6259.34	0	1874.02	59.12
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	\$ 1,936,760	272171.89	208826.01	135405.37	165513.32	155839.56
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	\$ 2,876,462	318695.62	624358.63	20316.93	128651.35	134146
572 UNDERGROUND LINES	OM572	PTRAN	\$ -	0	0	0	0	0
573 MISC PLANT	OM573	PTRAN	\$ 97,880	8341.27	4665	3732.37	5821.94	34823.78
Total Transmission Expenses			\$ 13,736,318	1,692,964.73	1,662,226.29	813,178.00	1,017,992.30	1,091,111.65

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Operation and Maintenance Expenses (Continued)								
Other Power Supply Expenses								
555 PURCHASED POWER Energy	OM555	OMPP	1,360,105.55	2,595,157.16	1,414,751.54	1,276,714.40	516,721.89	613,253.53
555 PURCHASED POWER Demand	OMD555	OMPPD	350,837.07	350,837.07	350,837.07	350,837.07	350,837.07	350,837.07
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	5,098,546.01	4,460,755.81	4,842,232.95	5,325,056.85	5,088,921.31	4,972,622.48
555 PURCHASED POWER OPTIONS	OMO555	OMPP	0	0	0	0	0	0
555 BROKERAGE FEES	OMB555	OMPP	0	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	0	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	0	92094.61	73384.96	71377.18	39951.63	51309.82
557 OTHER EXPENSES	OM557	PROFIX	1535653.17	1420108.84	1438109.81	1546376.13	1542523.95	2323941.19
558 DUPLICATE CHARGES	OM558	Energy	0	0	0	0	0	0
Total Other Power Supply Expenses	TPP		8,345,141.80	8,918,953.49	8,119,316.33	8,570,361.63	7,538,955.85	8,311,964.09
Total Electric Power Generation Expenses								
Transmission Expenses								
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	59387.59	61734.83	72275.43	57830.16	52970.2	70253.05
561 LOAD DISPATCHING	OM561	LBTRAN	89896.48	94173.59	104627.56	94297.49	86936.32	135835
562 STATION EXPENSES	OM562	PTRAN	84122.23	90931.03	103923.43	86043.52	116294.21	83898.29
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	87522.07	87158.79	89203.39	89187.21	86736.29	88209.66
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	229091.63	251486.95	238169.64	253067.81	259149.57	237980.88
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	28982.15	30160.95	44581.15	19944.19	35290.89	32930.62
567 RENTS	OM567	PTRAN	2058.43	2058.43	2058.43	2058.43	2058.43	2058.43
568 MAINTENACE SUPERVISION AND ENG	OM568	LBTRAN	44241.45	45590.11	51110.87	42324.47	40557.13	55824.53
569 STRUCTURES	OM569	PTRAN	80.04	577.95	1084.71	2771.42	1003.78	1896.87
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	124235.3	158259.64	153920.85	137834.03	134856.99	175088.1
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	140543.65	122631.69	245673.12	136904.15	282898.22	547382.49
572 UNDERGROUND LINES	OM572	PTRAN	0	0	0	0	0	0
573 MISC PLANT	OM573	PTRAN	4923.69	6697.42	5370.15	3919.44	6630.08	5359.76
Total Transmission Expenses			895,084.71	951,461.38	1,111,998.73	926,182.32	1,105,382.11	1,436,717.68

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Operation and Maintenance Expenses (Continued)			
Other Power Supply Expenses			
555 PURCHASED POWER Energy	OM555	OMPP	1559538.19
555 PURCHASED POWER Demand	OMD555	OMPPD	350837.07
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	5,122,362.96
555 PURCHASED POWER OPTIONS	OMO555	OMPP	0
555 BROKERAGE FEES	OMB555	OMPP	0
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	0
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	48189.16
557 OTHER EXPENSES	OM557	PROFIX	1599248
558 DUPLICATE CHARGES	OM558	Energy	0
Total Other Power Supply Expenses	TPP		8,680,175.38
Total Electric Power Generation Expenses			
Transmission Expenses			
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	51278.57
561 LOAD DISPATCHING	OM561	LBTRAN	136294.18
562 STATION EXPENSES	OM562	PTRAN	102872.03
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	98436.13
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	264049.42
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	30227.33
567 RENTS	OM567	PTRAN	2058.43
568 MAINTENANCE SUPERVISION AND ENG	OM568	LBTRAN	38868.14
569 STRUCTURES	OM569	PTRAN	11269.17
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	114809.26
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	174260.22
572 UNDERGROUND LINES	OM572	PTRAN	0
573 MISC PLANT	OM573	PTRAN	7595.34
Total Transmission Expenses			1,032,018.22

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Distribution Operation Expense								
580 OPERATION SUPERVISION AND ENGI	OM580	LBDO	\$ -	0	0	0	0	0
581 LOAD DISPATCHING	OM581	PDIST	\$ -	0	0	0	0	0
582 STATION EXPENSES	OM582	PDIST	\$ -	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	OM583	PDIST	\$ -	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	OM584	PDIST	\$ -	0	0	0	0	0
585 STREET LIGHTING EXPENSE	OM585	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES	OM586	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	PDIST	\$ -	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	PDIST	\$ -	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	\$ -	0	0	0	0	0
588 MISC DISTR EXP - MAPPIN	OM588x	PDIST	\$ -	0	0	0	0	0
589 RENTS	OM589	PDIST	\$ -	0	0	0	0	0
Total Distribution Operation Expense	OMDO		\$ -					
<u>Operation and Maintenance Expenses (Continued)</u>								
Distribution Maintenance Expense								
590 MAINTENANCE SUPERVISION AND EN	OM590	LBDM	\$ -	0	0	0	0	0
591 STRUCTURES	OM591	PDIST	\$ -	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	OM592	PDIST	\$ -	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	OM593	PDIST	\$ -	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	OM594	PDIST	\$ -	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	OM595	PDIST	\$ -	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	PDIST	\$ -	0	0	0	0	0
597 MAINTENANCE OF METERS	OM597	PDIST	\$ -	0	0	0	0	0
598 MISCELLANEOUS DISTRIBUTION EXPENSES	OM598	PDIST	\$ -	0	0	0	0	0
Total Distribution Maintenance Expense	OMDM		\$ -					
Total Distribution Operation and Maintenance Expenses								
Transmission and Distribution Expenses				13,736,318				
Production, Transmission and Distribution Expenses	OMSUB		\$	416,737,971				

Big Rivers Electric Corporation
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Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Distribution Operation Expenses								
580 OPERATION SUPERVISION AND ENGI	OM580	LBDO	0	0	0	0	0	0
581 LOAD DISPATCHING	OM581	PDIST	0	0	0	0	0	0
582 STATION EXPENSES	OM582	PDIST	0	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	OM583	PDIST	0	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	OM584	PDIST	0	0	0	0	0	0
585 STREET LIGHTING EXPENSE	OM585	PDIST	0	0	0	0	0	0
586 METER EXPENSES	OM586	PDIST	0	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	PDIST	0	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	PDIST	0	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	0	0	0	0	0	0
588 MISC DISTR EXP -- MAPPIN	OM588x	PDIST	0	0	0	0	0	0
589 RENTS	OM589	PDIST	0	0	0	0	0	0
Total Distribution Operation Expense	OMDO							
Operation and Maintenance Expenses (Continued)								
Distribution Maintenance Expense								
590 MAINTENANCE SUPERVISION AND EN	OM590	LBDM	0	0	0	0	0	0
591 STRUCTURES	OM591	PDIST	0	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	OM592	PDIST	0	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	OM593	PDIST	0	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	OM594	PDIST	0	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	OM595	PDIST	0	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	PDIST	0	0	0	0	0	0
597 MAINTENANCE OF METERS	OM597	PDIST	0	0	0	0	0	0
598 MISCELLANEOUS DISTRIBUTION EXPENSES	OM598	PDIST	0	0	0	0	0	0
Total Distribution Maintenance Expense	OMDM							
Total Distribution Operation and Maintenance Expenses								
Transmission and Distribution Expenses								
Production, Transmission and Distribution Expenses	OMSUB							

Big Rivers Electric Corporation
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Description	Name	Functional Vector	October 2010
Distribution Operation Expense			
580 OPERATION SUPERVISION AND ENGI	OM580	LBDO	0
581 LOAD DISPATCHING	OM581	PDIST	0
582 STATION EXPENSES	OM582	PDIST	0
583 OVERHEAD LINE EXPENSES	OM583	PDIST	0
584 UNDERGROUND LINE EXPENSES	OM584	PDIST	0
585 STREET LIGHTING EXPENSE	OM585	PDIST	0
586 METER EXPENSES	OM586	PDIST	0
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	PDIST	0
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	PDIST	0
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	0
588 MISC DISTR EXP – MAPPIN	OM588x	PDIST	0
589 RENTS	OM589	PDIST	0
Total Distribution Operation Expense	OMDO		
<u>Operation and Maintenance Expenses (Continued)</u>			
Distribution Maintenance Expense			
590 MAINTENANCE SUPERVISION AND EN	OM590	LBDM	0
591 STRUCTURES	OM591	PDIST	0
592 MAINTENANCE OF STATION EQUIPME	OM592	PDIST	0
593 MAINTENANCE OF OVERHEAD LINES	OM593	PDIST	0
594 MAINTENANCE OF UNDERGROUND LIN	OM594	PDIST	0
595 MAINTENANCE OF LINE TRANSFORME	OM595	PDIST	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	PDIST	0
597 MAINTENANCE OF METERS	OM597	PDIST	0
598 MISCELLANEOUS DISTRIBUTION EXPENSES	OM598	PDIST	0
Total Distribution Maintenance Expense	OMDM		
Total Distribution Operation and Maintenance Expenses			
Transmission and Distribution Expenses			
Production, Transmission and Distribution Expenses	OMSUB		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	\$ -	0	0	0	0	0
902 METER READING EXPENSES	OM902	F025	\$ -	0	0	0	0	0
903 RECORDS AND COLLECTION	OM903	F025	\$ -	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	\$ -	0	0	0	0	0
905 MISC CUST ACCOUNTS	OM903	F025	\$ -	0	0	0	0	0
Total Customer Accounts Expense	OMCA		\$ -					
Customer Service Expense								
907 SUPERVISION	OM907	TUP	\$ -	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	\$ 591,192	104389.97	75645.08	40729.07	42316.45	53316.29
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	\$ -	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	\$ -	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	\$ -	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	\$ -	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	\$ -	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	\$ -	0	0	0	0	0
913 ADVERTISING EXPENSES	OM913	TUP	\$ 488,103	103663.39	219971.2	7179.7	3679.68	21007.78
915 MDSE-JOBING-CONTRACT	OM915	TUP	\$ -	0	0	0	0	0
916 MISC SALES EXPENSE	OM916	TUP	\$ -	0	0	0	0	0
Total Customer Service Expense	OMCS		\$ 1,079,295	208053.36	295616.28	47908.77	45996.13	74324.07
Sub-Total Prod. Trans, Dist, Cust Acct and Cust Service	OMSUB2			417,817,266				
<u>Operation and Maintenance Expenses (Continued)</u>								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	\$ 14,315,713	2092449.03	1522142.97	1300504.05	1313340.25	1495631.43
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	\$ 6,915,648	432853.99	1082881.21	447533.76	790015.22	520665.52
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	\$ -	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	\$ 3,954,189	337609.86	1175322.5	167190.31	217289.45	526048.51
924 PROPERTY INSURANCE	OM924	TUP	\$ -	0	0	0	0	0
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	\$ 179,889	13413.2	21072.48	15311.2	15178.2	25828.68
926 EMPLOYEE BENEFITS	OM926	LBSUB9	\$ 169,663	4383.08	-2896.98	25050.87	3276.12	0
927 FRANCHISE REQUIREMENTS	OM927	TUP	\$ -	0	0	0	0	0
928 REGULATORY COMMISSION FEES	OM928	TUP	\$ 1,188,958	2785	925	0	0	1790.1
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	\$ -	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	\$ 1,686,131	68132.08	249532.88	81732.32	215359.96	139106.95
931 RENTS AND LEASES	OM931	PGP	\$ 1,933	161.09	161.09	161.09	161.09	161.09
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	\$ 208,156	23769.07	24452.06	14946.22	44645.76	14798.82
Total Administrative and General Expense	OMAG		\$ 28,620,280	2,975,556.40	4,073,593.21	2,052,429.82	2,599,266.05	2,724,031.10
Total Operation and Maintenance Expenses	TOM		\$ 446,437,546					
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP		\$ 224,914,919					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	0	0	0	0	0	0
902 METER READING EXPENSES	OM902	F025	0	0	0	0	0	0
903 RECORDS AND COLLECTION	OM903	F025	0	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	0	0	0	0	0	0
905 MISC CUST ACCOUNTS	OM903	F025	0	0	0	0	0	0
Total Customer Accounts Expense	OMCA							
Customer Service Expense								
907 SUPERVISION	OM907	TUP	0	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	42590.29	45548.65	47955.97	41989.91	36242.46	23856.1
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	0	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	0	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	0	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	0	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	0	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	0	0	0	0	0	0
913 ADVERTISING EXPENSES	OM913	TUP	-36141.33	11695.6	18760.65	13630.34	24487.44	100169
915 MDSE-JOBGING-CONTRACT	OM915	TUP	0	0	0	0	0	0
916 MISC SALES EXPENSE	OM916	TUP	0	0	0	0	0	0
Total Customer Service Expense	OMCS		6448.96	57244.25	66716.62	55620.25	60729.9	124025.1
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2							
<u>Operation and Maintenance Expenses (Continued)</u>								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	1326991.23	427833.15	1263415.19	446430.74	948956.12	1178332.32
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	591943.78	481169.78	617503.76	673906.86	384307.2	494280.5
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	0	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	388800.48	188378.03	280346.99	85723.73	284467.92	205203.9
924 PROPERTY INSURANCE	OM924	TUP	0	0	0	0	0	0
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	14679.26	12401	12401	12401	12401	12401
926 EMPLOYEE BENEFITS	OM926	LBSUB9	53705.24	8851.25	5962.88	6192.45	33341.38	6109.83
927 FRANCHISE REQUIREMENTS	OM927	TUP	0	0	0	0	0	0
928 REGULATORY COMMISSION FEES	OM928	TUP	1353.14	48087.75	665466.25	48046.08	139142.52	18419
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	0	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	94167.83	259652.47	119570.46	108391.43	155943.83	63658.14
931 RENTS AND LEASES	OM931	PGP	161.09	161.09	161.09	161.09	161.09	161.09
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	8698.33	7258.14	13445.04	8125.63	22399.01	9027.98
Total Administrative and General Expense	OMAG		2,480,500.38	1,433,792.66	2,978,272.66	1,389,379.01	1,981,120.07	1,987,593.76
Total Operation and Maintenance Expenses	TOM							
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP							

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Customer Accounts Expense			
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	0
902 METER READING EXPENSES	OM902	F025	0
903 RECORDS AND COLLECTION	OM903	F025	0
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	0
905 MISC CUST ACCOUNTS	OM903	F025	0
Total Customer Accounts Expense	OMCA		
Customer Service Expense			
907 SUPERVISION	OM907	TUP	0
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	36611.39
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	0
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	0
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	0
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	0
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	0
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	0
913 ADVERTISING EXPENSES	OM913	TUP	0
915 MDSE-JOBING-CONTRACT	OM915	TUP	0
916 MISC SALES EXPENSE	OM916	TUP	0
Total Customer Service Expense	OMCS		36611.39
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2		
<u>Operation and Maintenance Expenses (Continued)</u>			
Administrative and General Expense			
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	999686.96
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	398586.21
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	0
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	97807.2
924 PROPERTY INSURANCE	OM924	TUP	0
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	12401
926 EMPLOYEE BENEFITS	OM926	LBSUB9	25686.5
927 FRANCHISE REQUIREMENTS	OM927	TUP	0
928 REGULATORY COMMISSION FEES	OM928	TUP	262942.92
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	0
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	130882.85
931 RENTS AND LEASES	OM931	PGP	161.09
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	16590.29
Total Administrative and General Expense	OMAG		1,944,745.02
Total Operation and Maintenance Expenses	TOM		
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses								
Steam Power Generation Operation Expenses								
500 OPERATION SUPERVISION & ENGINEERING	LB500	PROFIX	\$ 4,967,667	342832.39	1034681.8	357452.74	317350.15	384316.78
501 FUEL	LB501	Energy	\$ 3,889,944	323255.71	364406.07	338654.53	313289.78	326385.9
502 STEAM EXPENSES	LB502	PROFIX	\$ 9,023,322	657659.63	771924.79	681077.92	630021.61	688026.67
505 ELECTRIC EXPENSES	LB505	PROFIX	\$ 4,523,897	357040.19	416235	378976.79	348125.67	369036.85
506 MISC. STEAM POWER EXPENSES	LB506	PROFIX	\$ 940,518	52261.31	80829.64	70706.68	101840.85	81036.08
507 RENTS	LB507	PROFIX	\$ -	0	0	0	0	0
509 ALLOWANCES	LB509	Energy	\$ -	0	0	0	0	0
Total Steam Power Operation Expenses	LBSUB1		\$ 23,345,348	1066961.13	1268989.43	1130761.39	1079988.13	1138099.6
Steam Power Generation Maintenance Expenses								
510 MAINTENANCE SUPERVISION & ENGINEERING	LB510	Energy	\$ 3,623,969	301562.96	282674.01	280925.01	285686.26	324812.85
511 MAINTENANCE OF STRUCTURES	LB511	PROFIX	\$ 986,831	60839.92	78449.28	79549.6	75632	64969.97
512 MAINTENANCE OF BOILER PLANT	LB512	Energy	\$ 8,700,235	613650.58	728746.59	804049.52	597501.69	694231.84
513 MAINTENANCE OF ELECTRIC PLANT	LB513	Energy	\$ 1,595,642	209176.55	143092.64	90379.11	93612.16	119373.66
514 MAINTENANCE OF MISC STEAM PLANT	LB514	PROFIX	\$ 200,886	16879.23	22485.07	12128	16408.41	14092.69
Total Steam Power Generation Maintenance Expense	LBSUB2		\$ 15,107,564	1202109.24	1255447.59	1267031.24	1068840.52	1217481.01
Total Steam Power Generation Expense			\$ 38,452,913	2269070.37	2524437.02	2397792.63	2148828.65	2355580.61
Labor Expenses (Continued)								
Other Power Generation Operation Expense								
546 OPERATION SUPERVISION & ENGINEERING	LB546	PROFIX	\$ -	0	0	0	0	0
547 FUEL	LB547	Energy	\$ -	0	0	0	0	0
548 GENERATION EXPENSE	LB548	PROFIX	\$ -	0	0	0	0	0
549 MISC OTHER POWER GENERATION	LB549	PROFIX	\$ -	0	0	0	0	0
550 RENTS	LB550	PROFIX	\$ -	0	0	0	0	0
Total Other Power Generation Expenses	LBSUB7		\$ -					
Other Power Generation Maintenance Expense								
551 MAINTENANCE SUPERVISION & ENGINEERING	LB551	PROFIX	\$ -	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	LB552	PROFIX	\$ -	0	0	0	0	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB553	PROFIX	\$ 89,555	682.21	4299.67	1026.96	2400.3	4848.64
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	LB554	PROFIX	\$ -	0	0	0	0	0
Total Other Power Generation Maintenance Expense	LBSUB8		\$ 89,555					
Total Other Power Generation Expense			\$ 89,555					
Total Production Expense	LPREX		\$ 38,542,468					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses								
Steam Power Generation Operation Expenses								
500 OPERATION SUPERVISION & ENGINEERING	LB500	PROFIX	338156.02	414149.39	371014.23	359005.08	369873.15	334189.99
501 FUEL	LB501	Energy	309863.06	297596.67	304977.88	310355.07	339148.89	336547.05
502 STEAM EXPENSES	LB502	PROFIX	640194.64	1123637.4	744724.17	661984.49	702417.45	982572.63
505 ELECTRIC EXPENSES	LB505	PROFIX	342341.75	393006.64	354302.21	368561.14	384521.42	384533.54
506 MISC. STEAM POWER EXPENSES	LB506	PROFIX	63015.48	66970.66	87852.14	88369.17	86572.5	91267.67
507 RENTS	LB507	PROFIX	0	0	0	0	0	0
509 ALLOWANCES	LB509	Energy	0	0	0	0	0	0
Total Steam Power Operation Expenses	LBSUB1		1045551.87	1583614.7	1186878.52	1118914.8	1173511.37	1458373.84
Steam Power Generation Maintenance Expenses								
510 MAINTENANCE SUPERVISION & ENGINEERING	LB510	Energy	297255.94	289425	296206.84	280281.91	307241.14	294029.27
511 MAINTENANCE OF STRUCTURES	LB511	PROFIX	50081.03	70791.44	106230.99	106856.88	116200.49	96973.59
512 MAINTENANCE OF BOILER PLANT	LB512	Energy	617716.63	961798.07	675983.16	535600.92	651081.61	924014.95
513 MAINTENANCE OF ELECTRIC PLANT	LB513	Energy	96940.39	142971.1	124922.34	132978.24	129288.01	126399.56
514 MAINTENANCE OF MISC STEAM PLANT	LB514	PROFIX	9843.3	16400.27	20426.8	23473.83	26283.4	15419.85
Total Steam Power Generation Maintenance Expense	LBSUB2		1071837.29	1481385.88	1223770.13	1079191.78	1230094.65	1456837.22
Total Steam Power Generation Expense			2117389.16	3065000.58	2410648.65	2198106.58	2403606.02	2915211.06
Labor Expenses (Continued)								
Other Power Generation Operation Expense								
546 OPERATION SUPERVISION & ENGINEERING	LB546	PROFIX	0	0	0	0	0	0
547 FUEL	LB547	Energy	0	0	0	0	0	0
548 GENERATION EXPENSE	LB548	PROFIX	0	0	0	0	0	0
549 MISC OTHER POWER GENERATION	LB549	PROFIX	0	0	0	0	0	0
550 RENTS	LB550	PROFIX	0	0	0	0	0	0
Total Other Power Generation Expenses	LBSUB7		0	0	0	0	0	0
Other Power Generation Maintenance Expense								
551 MAINTENANCE SUPERVISION & ENGINEERING	LB551	PROFIX	0	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	LB552	PROFIX	0	0	0	0	0	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB553	PROFIX	903.26	760.91	37267.71	11775.09	12921.35	10584.31
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	LB554	PROFIX	0	0	0	0	0	0
Total Other Power Generation Maintenance Expense	LBSUB8		903.26	760.91	37267.71	11775.09	12921.35	10584.31
Total Other Power Generation Expense			903.26	760.91	37267.71	11775.09	12921.35	10584.31
Total Production Expense	LPREX							

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
<u>Labor Expenses</u>			
Steam Power Generation Operation Expenses			
500 OPERATION SUPERVISION & ENGINEERING	LB500	PROFIX	344645.64
501 FUEL	LB501	Energy	325463.54
502 STEAM EXPENSES	LB502	PROFIX	739080.82
505 ELECTRIC EXPENSES	LB505	PROFIX	427215.91
506 MISC. STEAM POWER EXPENSES	LB506	PROFIX	69795.43
507 RENTS	LB507	PROFIX	0
509 ALLOWANCES	LB509	Energy	0
Total Steam Power Operation Expenses	LBSUB1		1236092.16
Steam Power Generation Maintenance Expenses			
510 MAINTENANCE SUPERVISION & ENGINEERING	LB510	Energy	383868.11
511 MAINTENANCE OF STRUCTURES	LB511	PROFIX	80256.21
512 MAINTENANCE OF BOILER PLANT	LB512	Energy	895859.55
513 MAINTENANCE OF ELECTRIC PLANT	LB513	Energy	186508.29
514 MAINTENANCE OF MISC STEAM PLANT	LB514	PROFIX	7045.58
Total Steam Power Generation Maintenance Expense	LBSUB2		1553537.74
Total Steam Power Generation Expense			2642951.16
<u>Labor Expenses (Continued)</u>			
Other Power Generation Operation Expense			
546 OPERATION SUPERVISION & ENGINEERING	LB546	PROFIX	0
547 FUEL	LB547	Energy	0
548 GENERATION EXPENSE	LB548	PROFIX	0
549 MISC OTHER POWER GENERATION	LB549	PROFIX	0
550 RENTS	LB550	PROFIX	0
Total Other Power Generation Expenses	LBSUB7		
Other Power Generation Maintenance Expense			
551 MAINTENANCE SUPERVISION & ENGINEERING	LB551	PROFIX	
552 MAINTENANCE OF STRUCTURES	LB552	PROFIX	
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB553	PROFIX	2084.81
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	LB554	PROFIX	
Total Other Power Generation Maintenance Expense	LBSUB8		
Total Other Power Generation Expense			
Total Production Expense	LPREX		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses (Continued)								
Purchased Power								
555 PURCHASED POWER	LB555	OMPP	\$ -	0	0	0	0	0
555 PURCHASED POWER Demand	LB555	OMPPD	\$ -	0	0	0	0	0
555 PURCHASED POWER OPTIONS	LBO555	OMPP	\$ -	0	0	0	0	0
555 BROKERAGE FEES	LBB555	OMPP	\$ -	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	\$ -	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	\$ -	0	0	0	0	0
557 OTHER EXPENSES	LB557	PROFIX	\$ -	0	0	0	0	0
558 DUPLICATE CHARGES	LB558	Energy	\$ -	0	0	0	0	0
Total Purchased Power Labor	LBPP		\$ -					
Transmission Labor Expenses								
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	\$ 835,977	155357.97	88621.66	61719.3	53192.77	69331.26
561 LOAD DISPATCHING	LB561	PTRAN	\$ 1,304,969	240520.6	133245.05	93819.32	87693.64	104400.26
562 STATION EXPENSES	LB562	PTRAN	\$ 598,382	102945.93	50883.95	33705.43	39512.69	54112.06
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	\$ 236,393	52690.64	20206.01	20032.96	18769.45	17519.18
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	\$ -	0	0	0	0	0
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	\$ 312,375	55300.19	33112.8	26544.3	26563.55	28599.72
567 RENTS	LB567	PTRAN	\$ -	0	0	0	0	0
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	\$ 644,925	120270.89	65874.61	48314.25	39737.97	53182.86
569 MAINTENACE OF STRUCTURES	LB569	PTRAN	\$ 318	36.88	59.34	0	0	59.12
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	\$ 1,433,304	240458.8	137581.27	112331.02	103977.18	112839.1
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	\$ 1,067,766	187769.72	120250.23	62124.04	70835.46	82150.36
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	\$ 46,439	6906.42	2875.43	2872.93	4248.62	4851.27
Total Transmission Labor Expenses	LBTRAN		\$ 6,480,848	1162258.04	652710.35	461463.55	444531.33	527045.19
Distribution Operation Labor Expense								
580 OPERATION SUPERVISION AND ENGI	LB580	F023	\$ -	0	0	0	0	0
581 LOAD DISPATCHING	LB581	PDIST	\$ -	0	0	0	0	0
582 STATION EXPENSES	LB582	PDIST	\$ -	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	LB583	PDIST	\$ -	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	\$ -	0	0	0	0	0
585 STREET LIGHTING EXPENSE	LB585	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES	LB586	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	\$ -	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	\$ -	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	\$ -	0	0	0	0	0
589 RENTS	LB589	PDIST	\$ -	0	0	0	0	0
Total Distribution Operation Labor Expense	LBDO		\$ -					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses (Continued)								
Purchased Power								
555 PURCHASED POWER	LB555	OMPP	0	0	0	0	0	0
555 PURCHASED POWER Demand	LBD555	OMPPD	0	0	0	0	0	0
555 PURCHASED POWER OPTIONS	LBO555	OMPP	0	0	0	0	0	0
555 BROKERAGE FEES	LBB555	OMPP	0	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	0	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	0	0	0	0	0	0
557 OTHER EXPENSES	LB557	PROFIX	0	0	0	0	0	0
558 DUPLICATE CHARGES	LB558	Energy	0	0	0	0	0	0
Total Purchased Power Labor	LBPP							
Transmission Labor Expenses								
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	57113.62	58908.5	68081.43	56191.8	51380.65	68130.77
561 LOAD DISPATCHING	LB561	PTRAN	79471.75	90840.85	104792.75	86864.08	84835.7	115440.78
562 STATION EXPENSES	LB562	PTRAN	43463.43	48316.48	56470.33	35035.32	46067.52	51613.79
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	14223.62	16460.25	15132.13	14168.98	13692.1	15806.34
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	0	0	0	0	0	0
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	21343.51	20102.2	25810.07	11252.29	17357.03	25204.78
567 RENTS	LB567	PTRAN	0	0	0	0	0	0
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	43994.75	45554.09	50783.31	42264.13	40489.73	55734.99
569 MAINTENACE OF STRUCTURES	LB569	PTRAN	26.22	0	24.61	26.14	26.21	0.65
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	98690.36	92937.1	116008.73	108080.33	93852.16	126204.48
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	66143.16	68592.74	93608.24	76903.52	71073.25	95620.68
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	4378.83	3303.42	3349.41	3196.71	3607.42	3592.3
Total Transmission Labor Expenses	LBTRAN		428849.25	445015.63	534061.01	433983.3	422381.77	557349.56
Distribution Operation Labor Expense								
580 OPERATION SUPERVISION AND ENGI	LB580	F023	0	0	0	0	0	0
581 LOAD DISPATCHING	LB581	PDIST	0	0	0	0	0	0
582 STATION EXPENSES	LB582	PDIST	0	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	LB583	PDIST	0	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	0	0	0	0	0	0
585 STREET LIGHTING EXPENSE	LB585	PDIST	0	0	0	0	0	0
586 METER EXPENSES	LB586	PDIST	0	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	0	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	0	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	0	0	0	0	0	0
589 RENTS	LB589	PDIST	0	0	0	0	0	0
Total Distribution Operation Labor Expense	LBDO							

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Labor Expenses (Continued)			
Purchased Power			
555 PURCHASED POWER	LB555	OMPP	0
555 PURCHASED POWER Demand	LBD555	OMPPD	0
555 PURCHASED POWER OPTIONS	LBO555	OMPP	0
555 BROKERAGE FEES	LBB555	OMPP	0
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	0
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	0
557 OTHER EXPENSES	LB557	PROFIX	0
558 DUPLICATE CHARGES	LB558	Energy	0
Total Purchased Power Labor	LBPP		0
Transmission Labor Expenses			
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	47946.89
561 LOAD DISPATCHING	LB561	PTRAN	83043.95
562 STATION EXPENSES	LB562	PTRAN	36255.02
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	17691.07
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	21184.45
567 RENTS	LB567	PTRAN	
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	38723.49
569 MAINTENACE OF STRUCTURES	LB569	PTRAN	59.17
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	90343.75
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	72694.7
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	3256.6
Total Transmission Labor Expenses	LBTRAN		205077.71
Distribution Operation Labor Expense			
580 OPERATION SUPERVISION AND ENGI	LB580	F023	0
581 LOAD DISPATCHING	LB581	PDIST	0
582 STATION EXPENSES	LB582	PDIST	0
583 OVERHEAD LINE EXPENSES	LB583	PDIST	0
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	0
585 STREET LIGHTING EXPENSE	LB585	PDIST	0
586 METER EXPENSES	LB586	PDIST	0
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	0
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	0
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	0
589 RENTS	LB589	PDIST	0
Total Distribution Operation Labor Expense	LBDO		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses (Continued)								
Distribution Maintenance Labor Expense								
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	\$ -	0	0	0	0	0
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	\$ -	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	\$ -	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	\$ -	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	\$ -	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	\$ -	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	\$ -	0	0	0	0	0
597 MAINTENANCE OF METERS	LB597	PDIST	\$ -	0	0	0	0	0
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	\$ -	0	0	0	0	0
Total Distribution Maintenance Labor Expense	LBDM		\$ -					
Total Distribution Operation and Maintenance Labor Expenses		PDIST						
Transmission and Distribution Labor Expenses				6,480,848				
Production, Transmission and Distribution Labor Expenses	LBSUB		\$ 45,023,316					
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	\$ -	0	0	0	0	0
902 METER READING EXPENSES	LB902	F025	\$ -	0	0	0	0	0
903 RECORDS AND COLLECTION	LB903	F025	\$ -	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	\$ -	0	0	0	0	0
905 MISC CUST ACCOUNTS	LB903	F025	\$ -	0	0	0	0	0
Total Customer Accounts Labor Expense	LBCA		\$ -					
Customer Service Expense								
907 SUPERVISION	LB907	TUP	\$ -	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	\$ 544,608	98543.49	44838.51	39429.59	38666.03	49827.22
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	\$ -	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	\$ -	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	\$ -	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	\$ -	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	\$ -	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	\$ -	0	0	0	0	0
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	\$ -	0	0	0	0	0
915 MDSE-JOBING-CONTRACT	LB915	TUP	\$ -	0	0	0	0	0
916 MISC SALES EXPENSE	LB916	TUP	\$ -	0	0	0	0	0
Total Customer Service Labor Expense	LBCS		\$ 544,608	98543.49	44838.51	39429.59	38666.03	49827.22
Sub-Total Labor Exp	LBSUB9			45,567,924				

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses (Continued)								
Distribution Maintenance Labor Expense								
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	0	0	0	0	0	0
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	0	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	0	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	0	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	0	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	0	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	0	0	0	0	0	0
597 MAINTENANCE OF METERS	LB597	PDIST	0	0	0	0	0	0
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	0	0	0	0	0	0
Total Distribution Maintenance Labor Expense	LBDM							
Total Distribution Operation and Maintenance Labor Expenses		PDIST						
Transmission and Distribution Labor Expenses								
Production, Transmission and Distribution Labor Expenses	LBSUB							
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	0	0	0	0	0	0
902 METER READING EXPENSES	LB902	F025	0	0	0	0	0	0
903 RECORDS AND COLLECTION	LB903	F025	0	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	0	0	0	0	0	0
905 MISC CUST ACCOUNTS	LB903	F025	0	0	0	0	0	0
Total Customer Accounts Labor Expense	LBCA							
Customer Service Expense								
907 SUPERVISION	LB907	TUP	0	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	37915.48	41556.72	44591.58	38345.68	32873.52	44118.04
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	0	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	0	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	0	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	0	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	0	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	0	0	0	0	0	0
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	0	0	0	0	0	0
915 MDSE-JOBING-CONTRACT	LB915	TUP	0	0	0	0	0	0
916 MISC SALES EXPENSE	LB916	TUP	0	0	0	0	0	0
Total Customer Service Labor Expense	LBCS		37915.48	41556.72	44591.58	38345.68	32873.52	44118.04
Sub-Total Labor Exp	LBSUB9							

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Labor Expenses (Continued)			
Distribution Maintenance Labor Expense			
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	
597 MAINTENANCE OF METERS	LB597	PDIST	
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	
Total Distribution Maintenance Labor Expense	LBDM		
Total Distribution Operation and Maintenance Labor Expenses		PDIST	
Transmission and Distribution Labor Expenses			
Production, Transmission and Distribution Labor Expenses	LBSUB		
Customer Accounts Expense			
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	
902 METER READING EXPENSES	LB902	F025	
903 RECORDS AND COLLECTION	LB903	F025	
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	
905 MISC CUST ACCOUNTS	LB903	F025	
Total Customer Accounts Labor Expense	LBCA		
Customer Service Expense			
907 SUPERVISION	LB907	TUP	
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	33902.45
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	
915 MDSE-JOBING-CONTRACT	LB915	TUP	
916 MISC SALES EXPENSE	LB916	TUP	
Total Customer Service Labor Expense	LBCS		33902.45
Sub-Total Labor Exp	LBSUB9		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses (Continued)								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	LB920	LBSUB9	\$ 14,315,714	2092449.04	1522142.8	1300504.05	1313340.25	1495631.43
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB9	\$ -	0	0	0	0	0
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB922	LBSUB9	\$ -	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	LB923	LBSUB9	\$ -	0	0	0	0	0
924 PROPERTY INSURANCE	LB924	TUP	\$ -	0	0	0	0	0
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB9	\$ 27,509	2777.2	3471.48	2777.2	2777.2	13427.68
926 EMPLOYEE BENEFITS	LB926	LBSUB9	\$ 17,136	2711	-43974.67	0	0	0
928 REGULATORY COMMISSION FEES	LB928	TUP	\$ -	0	0	0	0	0
929 DUPLICATE CHARGES-CR	LB929	LBSUB9	\$ -	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	LB930	LBSUB9	\$ -	0	0	0	0	0
931 RENTS AND LEASES	LB931	PGP	\$ -	0	0	0	0	0
935 MAINTENANCE OF GENERAL PLANT	LB935	PGP	\$ 74,927	14602.3	14130.42	6605.75	5191.93	4971.6
Total Administrative and General Expense	LBAG		\$ 14,435,286					
Total Operation and Maintenance Expenses	TLB		\$ 60,003,210					
Operation and Maintenance Expenses Less Purchase Power	LBLPP		\$ 60,003,210					
Other Expenses								
Depreciation Expenses								
Production	DEPRDP2	PPROD	\$ 28,815,395	2347440.74	2389099.7	2595994.55	2361961.48	2361968.56
Transmission	DEPRDP3	PTRAN	\$ 5,182,459	443546.44	533184.66	214261.5	442312.53	442305.66
Transmission	DEPRDP4	PTRAN	\$ -					
Distribution	DEPRDP5	PDIST	\$ -					
General & Common Plant	DEPRDP6	PGP	\$ 238,155	17050.71	19802.63	19799.44	19799.44	19766.55
Other Plant	DEPROTH	TPIS	\$ -	0	0	0	0	0
Total Depreciation Expense	TDEPR		\$ 34,236,009	2808037.89	2942086.99	2830055.49	2824073.45	2824040.77
Accretion Expense								
Production	ACRTNP	F017	\$ -	0	0	0	0	0
Transmission	ACRTNT	PTRAN	\$ -	0	0	0	0	0
Distribution	ACRTND	PDIST	\$ -	0	0	0	0	0
Total Accretion Expense	TACRTN		\$ -					
Property Taxes & Other	PTAX	TUP	\$ (94,563)	\$ (379,997)	\$ 87,636	\$ -	\$ -	\$ 910
Amortization of investment Tax Credit	OTAX	TUP	\$ -	0	0	0	0	0
Other Expenses	OT	TUP	\$ (365,864)	\$ (6,691)	\$ (14,191)	\$ (18,627)	\$ (23,851)	\$ (16,042)
Interest	INTLTD	TUP	\$ 47,622,710	4168487.53	4316793.16	4234968.72	3796291.74	4133482.27
Other Deductions	DEDUCT	TUP	\$ 109,257	7611	15379	4539	6545	5640
Total Other Expenses	TOE		\$ 81,507,549	\$ 3,789,411	\$ 4,405,617	\$ 4,220,881	\$ 3,778,986	\$ 4,123,991
Total Cost of Service (O&M + Other Expenses)			\$ 527,945,095					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses (Continued)								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	LB920	LBSUB9	1326991.23	427833.15	1263415.19	446430.74	948956.12	1178332.32
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB9	0	0	0	0	0	0
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB922	LBSUB9	0	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	LB923	LBSUB9	0	0	0	0	0	0
924 PROPERTY INSURANCE	LB924	TUP	0	0	0	0	0	0
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB9	2278.26	0	0	0	0	0
926 EMPLOYEE BENEFITS	LB926	LBSUB9	23360	5840	5840	5840	5840	5840
928 REGULATORY COMMISSION FEES	LB928	TUP	0	0	0	0	0	0
929 DUPLICATE CHARGES-CR	LB929	LBSUB9	0	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	LB930	LBSUB9	0	0	0	0	0	0
931 RENTS AND LEASES	LB931	PGP	0	0	0	0	0	0
935 MAINTENANCE OF GENERAL PLANT	LB935	PGP	5560.19	2953.32	3794.54	2464	6700.24	5197.69
Total Administrative and General Expense	LBAG							
Total Operation and Maintenance Expenses	TLB							
Operation and Maintenance Expenses Less Purchase Power	LBLPP							
Other Expenses								
Depreciation Expenses								
Production	DEPRDP2	PPROD	2361962.84	2422279.6	2384018.59	2354733.3	2368037.83	2494767.54
Transmission	DEPRDP3	PTRAN	442357.04	442363.4	442363.15	442486.5	440016.44	450445.41
Transmission	DEPRDP4	PTRAN						
Distribution	DEPRDP5	PDIST						
General & Common Plant	DEPRDP6	PGP	19733.28	21031.35	19852.73	20082.98	19987.32	21286.62
Other Plant	DEPROTH	TPIS	0	0	0	0	0	0
Total Depreciation Expense	TDEPR		2824053.16	2885674.35	2846234.47	2817302.78	2828041.59	2966499.57
Accretion Expense								
Production	ACRTNP	F017	0	0	0	0	0	0
Transmission	ACRTNT	PTRAN	0	0	0	0	0	0
Distribution	ACRTND	PDIST	0	0	0	0	0	0
Total Accretion Expense	TACRTN							
Property Taxes & Other	PTAX	TUP	\$ 65,000	\$ 2,342	\$ 65,000	\$ -	\$ (429)	\$ 65,000
Amortization of Investment Tax Credit	OTAX	TUP	0	0	0	0	0	0
Other Expenses	OT	TUP	\$ (27,557)	\$ (8,263)	\$ (42,136)	\$ (42,545)	\$ (48,997)	\$ (56,550)
Interest	INTLTD	TUP	3848131.38	3699835.35	3741933.32	3942436.65	3958146.18	3830668.47
Other Deductions	DEDUCT	TUP	-2109	4540	14599	10828	16243	12411
Total Other Expenses	TOE		\$ 3,883,465	\$ 3,698,454	\$ 3,779,396	\$ 3,910,720	\$ 3,924,964	\$ 3,851,529
Total Cost of Service (O&M + Other Expenses)								

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Labor Expenses (Continued)			
Administrative and General Expense			
920 ADMIN. & GEN. SALARIES-	LB920	LBSUB9	999687.37
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB9	
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB922	LBSUB9	
923 OUTSIDE SERVICES EMPLOYED	LB923	LBSUB9	
924 PROPERTY INSURANCE	LB924	TUP	
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB9	0
926 EMPLOYEE BENEFITS	LB926	LBSUB9	5840
928 REGULATORY COMMISSION FEES	LB928	TUP	
929 DUPLICATE CHARGES-CR	LB929	LBSUB9	
930 MISCELLANEOUS GENERAL EXPENSES	LB930	LBSUB9	
931 RENTS AND LEASES	LB931	PGP	
935 MAINTENANCE OF GENERAL PLANT	LB935	PGP	2754.81
Total Administrative and General Expense	LBAG		
Total Operation and Maintenance Expenses	TLB		
Operation and Maintenance Expenses Less Purchase Power	LBLPP		
Other Expenses			
Depreciation Expenses			
Production	DEPRDP2	PPROD	2373130.48
Transmission	DEPRDP3	PTRAN	446815.89
Transmission	DEPRDP4	PTRAN	
Distribution	DEPRDP5	PDIST	
General & Common Plant	DEPRDP6	PGP	19962.11
Other Plant	DEPROTH	TPIS	0
Total Depreciation Expense	TDEPR		2839908.48
Accretion Expense			
Production	ACRTNP	F017	0
Transmission	ACRTNT	PTRAN	0
Distribution	ACRTND	PDIST	0
Total Accretion Expense	TACRTN		
Property Taxes & Other	PTAX	TUP	\$ (25)
Amortization of Investment Tax Credit	OTAX	TUP	0
Other Expenses	OT	TUP	\$ (60,414)
Interest	INTLTD	TUP	3951535
Other Deductions	DEDUCT	TUP	13031
Total Other Expenses	TOE		\$ 3,904,127
Total Cost of Service (O&M + Other Expenses)			

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Revenues								
Jackson Purchase			\$ 31,526,082	2,047,421	2,967,876	3,236,562	2,630,578	2,282,284
Kenergy			\$ 56,579,648	3,789,093	5,385,841	5,977,907	4,990,050	4,209,222
Meade			\$ 22,828,970	1,551,653	2,374,865	2,690,998	2,281,167	1,830,442
Large Industrial			\$ 39,110,620	3,326,073	3,242,060	3,257,550	3,000,170	3,334,841
Century Total			\$ 150,725,511	14,123,587	13,900,845	12,327,658	10,978,277	13,026,782
Alcan Total			\$ 131,680,624	11,327,935	11,867,881	11,227,291	10,087,671	11,349,236
	Total Rural		\$ 110,934,700	\$ 7,388,167	\$ 10,728,582	\$ 11,905,467	\$ 9,901,794	\$ 8,321,948
	Total Industrial		\$ 39,110,620	\$ 8,666,818	\$ 11,002,766	\$ 11,926,456	\$ 10,271,387	\$ 9,374,506
	Total Smelter		\$ 282,406,135	\$ 25,451,523	\$ 25,768,725	\$ 23,554,949	\$ 21,065,948	\$ 24,376,019
	Total		\$ 432,451,455	\$ 36,165,762	\$ 39,739,368	\$ 38,717,967	\$ 33,967,912	\$ 36,032,808
Century Invoiced			\$ 149,837,373	12,898,686	13,350,197	12,412,617	10,978,277	13,026,782
Alcan Invoiced			\$ 131,911,075	10,982,583	11,672,836	11,353,440	10,087,671	11,349,236
Century Adjustments			\$ 888,139	1,224,902	550,648	(84,959)		
Alcan Adjustments			\$ (230,451)	345,352	195,044	(126,150)		
Off System Sales			\$ 76,543,801	\$ 1,839,442	\$ 4,073,308	\$ 8,147,840	\$ 9,539,433	\$ 7,986,498
Income from Leased Property Net			\$ 149,673	\$ 149,673	\$ -	\$ -	\$ -	\$ -
Other Operating Revenue & Income			\$ 13,778,745	\$ 1,230,861	\$ 1,033,968	\$ 1,152,998	\$ 1,145,023	\$ 1,070,097
OSS Variable O&M			\$ 46,035,981	\$ 1,471,622	\$ 2,691,212	\$ 4,162,194	\$ 5,284,841	\$ 5,083,040
Energy								
Jackson Purchase			694,512,540	45,926,970	65,978,630	71,338,200	59,712,514	49,429,743
Kenergy			1,255,008,258	85,135,870	120,014,010	132,891,880	114,367,690	91,992,020
Meade			499,627,006	34,444,920	51,694,410	59,035,140	51,393,370	38,028,116
Large Industrial			928,887,170	78,192,702	74,359,872	75,056,282	70,510,685	78,126,590
Century			3,949,411,321	310,167,027	331,563,740	339,238,984	318,278,276	343,763,177
Alcan			3,163,910,039	257,031,413	268,912,646	270,478,213	245,969,029	270,738,402
Total Rural			2,449,147,804	165,507,760	237,687,050	263,265,220	225,473,574	179,449,879
Total Industrial			928,887,170	78,192,702	74,359,872	75,056,282	70,510,685	78,126,590
Total Smelter			7,113,321,360	567,198,440	600,476,386	609,717,197	564,247,305	614,501,579
Total			10,491,356,334	810,898,902	912,523,308	948,038,699	860,231,564	872,078,048

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Revenues								
Jackson Purchase			1,799,767	2,308,067	3,063,639	3,258,780	3,399,012	2,561,800
Kenergy			3,188,379	4,134,538	5,323,163	5,636,870	5,853,842	4,573,561
Meade			1,214,667	1,532,681	1,963,540	2,110,692	2,169,733	1,693,499
Large Industrial			3,161,352	3,245,699	3,234,324	3,234,990	3,373,185	3,344,243
Century Total			12,044,160	12,679,922	11,679,623	12,055,865	12,367,467	11,801,654
Alcan Total			10,471,146	11,169,007	10,543,631	10,857,129	10,839,072	10,177,927
	Total Rural		\$ 6,202,813	\$ 7,975,287	\$ 10,350,341	\$ 11,006,341	\$ 11,422,586	\$ 8,828,859
	Total Industrial		\$ 7,564,398	\$ 8,912,918	\$ 10,521,026	\$ 10,982,552	\$ 11,396,759	\$ 9,611,302
	Total Smelter		\$ 22,515,306	\$ 23,848,930	\$ 22,223,254	\$ 22,912,994	\$ 23,206,539	\$ 21,979,581
	Total		\$ 31,879,471	\$ 35,069,915	\$ 35,807,919	\$ 37,154,326	\$ 38,002,310	\$ 34,152,683
Century Invoiced			12,044,160	12,679,922	11,679,623	12,055,865	12,367,467	12,580,920
Alcan Invoiced			10,471,146	11,169,007	10,543,631	10,857,129	10,839,072	10,806,724
Century Adjustments								(779,265)
Alcan Adjustments								(628,797)
Off System Sales			\$ 5,678,794	\$ 6,341,556	\$ 7,049,362	\$ 7,908,927	\$ 8,630,309	\$ 5,166,061
Income from Leased Property Net			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Other Operating Revenue & Income			\$ 1,140,133	\$ 1,143,171	\$ 1,284,686	\$ 1,142,016	\$ 1,145,336	\$ 1,142,234
OSS Variable O&M			\$ 3,852,774	\$ 3,932,574	\$ 3,863,529	\$ 4,155,945	\$ 4,803,709	\$ 3,568,984
Energy								
Jackson Purchase			40,334,720	49,465,221	67,937,977	74,389,907	74,455,490	53,358,978
Kenergy			72,904,910	88,391,581	119,415,050	128,859,539	129,305,728	95,902,980
Meade			28,079,875	32,805,170	43,966,515	47,969,570	47,509,670	35,325,370
Large Industrial			78,086,611	79,512,076	79,858,265	78,927,327	82,005,334	79,182,043
Century			323,212,786	331,276,534	324,397,171	337,256,977	345,310,998	317,766,683
Alcan			260,668,275	268,579,997	259,859,800	268,729,560	268,160,608	257,328,832
Total Rural			141,319,505	170,661,972	231,319,542	251,219,016	251,270,888	184,587,328
Total Industrial			78,086,611	79,512,076	79,858,265	78,927,327	82,005,334	79,182,043
Total Smelter			583,881,061	599,856,531	584,256,971	605,986,537	613,471,606	575,095,515
Total			803,287,177	850,030,579	895,434,778	936,132,880	946,747,828	838,864,886

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Revenues			
Jackson Purchase			1,970,297
Kenergy			3,517,183
Meade			1,415,034
Large Industrial			3,356,132
Century Total			13,739,670
Alcan Total			11,762,698
	Total Rural		\$ 6,902,515
	Total Industrial		\$ 8,288,350
	Total Smelter		\$ 25,502,368
	Total		\$ 35,761,015
Century Invoiced			13,762,856
Alcan Invoiced			11,778,599
Century Adjustments			(23,186)
Alcan Adjustments			(15,901)
Off System Sales			4,182,271
Income from Leased Property Net			\$ -
Other Operating Revenue & Income			\$ 1,148,221
OSS Variable O&M			\$ 3,165,556
Energy			
Jackson Purchase			42,184,190
Kenergy			75,827,000
Meade			29,374,880
Large Industrial			75,069,383
Century			327,178,968
Alcan			267,453,264
Total Rural			147,386,070
Total Industrial			75,069,383
Total Smelter			594,632,232
Total			817,087,685

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Plant in Service</u>							
Intangible Plant	INTPLT	PT&D	\$ 66,895	58,634	-	-	8,261
Production Plant	PPROD	F001	\$ 1,686,796,955	1,686,796,955	-	-	-
Transmission Plant	PTRAN	F002	\$ 237,659,206	-	-	-	237,659,206
Distribution Plant	PDIST	F003	\$ -	-	-	-	-
Total Production & Transmission Plant	PT&D		1,924,456,160	1,686,796,955	-	-	237,659,206
General Plant	PGP	PT&D	\$ 18,511,051	16,225,043	-	-	2,286,008
Total Plant in Service	TPIS		\$ 1,943,034,107	\$ 1,703,080,632	\$ -	\$ -	\$ 239,953,475
<u>Construction Work in Progress (CWIP)</u>							
CWIP Production	CWIP1	PPROD	\$ 22,411,274	22,411,274	-	-	-
CWIP Transmission	CWIP2	PTRAN	\$ 7,475,859	-	-	-	7,475,859
CWIP Distribution Plant	CWIP3	PDIST	\$ -	-	-	-	-
CWIP General Plant	CWIP4	PT&D	\$ 16,915,005	14,826,100	-	-	2,088,905
Total Construction Work in Progress	TCWIP		\$ 46,802,138	\$ 37,237,374	\$ -	\$ -	\$ 9,564,764
Total Utility Plant			\$ 1,989,836,245	\$ 1,740,318,006	\$ -	\$ -	\$ 249,518,239

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Rate Base							
Total Utility Plant	TUP		\$ 1,989,836,245	\$ 1,740,318,006	\$ -	\$ -	\$ 249,518,239
Less: Accumulated Provision for Depreciation							
Production	ADEPREPA	PPROD	\$ 790,847,523	790,847,523	-	-	-
Transmission	ADEPRTP	PTRAN	\$ 107,564,747	-	-	-	107,564,747
Distribution	ADEPRD11	PDIST	\$ -	-	-	-	-
General & Common Plant	ADEPRD12	PT&D	\$ 6,300,770	5,522,661	-	-	778,109
Intangible, Misc, and Other Plant	ADEPRGP	PT&D	\$ -	-	-	-	-
Retirement Work In Progress	ADEPRRT	PT&D	\$ -	-	-	-	-
Total Accumulated Depreciation	TADEPR		\$ 904,713,040	\$ 796,370,184	\$ -	\$ -	\$ 108,342,855
Net Utility Plant	NTPLANT		\$ 1,085,123,206	\$ 943,947,822	\$ -	\$ -	\$ 141,175,384
Working Capital							
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP	\$ 28,114,365	13,900,247	11,969,243	-	2,244,875
Materials and Supplies	M&S	TPIS	\$ 22,777,820	19,964,891	-	-	2,812,929
Fuel Stock	PREPAY	TPIS	\$ 34,326,112	30,087,036	-	-	4,239,076
Total Working Capital	TWC		\$ 85,218,297	\$ 63,952,174	\$ 11,969,243	\$ -	\$ 9,296,880
Net Rate Base	RB		\$ 1,170,341,502	\$ 1,007,899,995	\$ 11,969,243	\$ -	\$ 150,472,264

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Operation and Maintenance Expenses							
Steam Power Generation Operation Expenses							
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	\$ 4,974,566	4,974,566	-	-	-
501 FUEL	OM501	Energy	\$ 200,919,367	-	200,919,367	-	-
502 STEAM EXPENSES	OM502	PROFIX	\$ 34,453,882	34,453,882	-	-	-
505 ELECTRIC EXPENSES	OM505	PROFIX	\$ 5,730,122	5,730,122	-	-	-
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	\$ 7,451,302	7,451,302	-	-	-
507 RENTS	OM507	PROFIX	\$ -	-	-	-	-
509 ALLOWANCES	OM509	Energy	\$ 429,682	-	429,682	-	-
Total Steam Power Operation Expenses			\$ 253,958,921	\$ 52,609,872	\$ 201,349,049	\$ -	\$ -
Steam Power Generation Maintenance Expenses							
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	\$ 3,631,867	-	3,631,867	-	-
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	\$ 3,346,806	3,346,806	-	-	-
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	\$ 30,113,309	-	30,113,309	-	-
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	\$ 6,251,804	-	6,251,804	-	-
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	\$ 877,364	877,364	-	-	-
Total Steam Power Generation Maintenance Expense			\$ 44,221,151	\$ 4,224,170	\$ 39,996,981	\$ -	\$ -
Total Steam Power Generation Expense			\$ 298,180,072	\$ 56,834,042	\$ 241,346,030	\$ -	\$ -

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
 October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Operation and Maintenance Expenses (Continued)							
Other Power Generation Operation Expense							
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	\$ -	-	-	-	-
547 FUEL	OM547	Energy	\$ 706,789	-	706,789	-	-
548 GENERATION EXPENSE	OM548	PROFIX	\$ 34,608	34,608	-	-	-
549 MISC OTHER POWER GENERATION	OM549	PROFIX	\$ -	-	-	-	-
550 RENTS	OM550	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Expenses			\$ 741,396	\$ 34,608	\$ 706,789	\$ -	\$ -
Other Power Generation Maintenance Expense							
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	\$ -	-	-	-	-
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	\$ -	-	-	-	-
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	\$ 625,088	625,088	-	-	-
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Maintenance Expense			\$ 625,088	\$ 625,088	\$ -	\$ -	\$ -
Total Other Power Generation Expense			\$ 1,366,485	\$ 659,696	\$ 706,789	\$ -	\$ -
Total Station Expense			\$ 299,546,557	\$ 57,493,738	\$ 242,052,819	\$ -	\$ -

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
 October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Operation and Maintenance Expenses (Continued)							
Other Power Supply Expenses							
555 PURCHASED POWER Energy	OM555	OMPP	\$ 19,466,790	-	19,466,790	-	-
555 PURCHASED POWER Demand	OMD555	OMPPD	\$ 4,210,045	4,210,045	-	-	-
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	\$ 58,293,374	13,175,571	45,117,803	-	-
555 PURCHASED POWER OPTIONS	OMO555	OMPP	\$ -	-	-	-	-
555 BROKERAGE FEES	OMB555	OMPP	\$ -	-	-	-	-
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	\$ -	-	-	-	-
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	\$ 909,422	909,422	-	-	-
557 OTHER EXPENSES	OM557	PROFIX	\$ 20,575,465	20,575,465	-	-	-
558 DUPLICATE CHARGES	OM558	Energy	\$ -	-	-	-	-
Total Other Power Supply Expenses	TPP		\$ 103,455,096	\$ 38,870,503	\$ 64,584,593	\$ -	\$ -
Total Electric Power Generation Expenses			\$ 403,001,653	\$ 96,364,241	\$ 306,637,411	\$ -	\$ -
Transmission Expenses							
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	\$ 876,815	-	-	-	876,815
561 LOAD DISPATCHING	OM561	LBTRAN	\$ 1,454,938	-	-	-	1,454,938
562 STATION EXPENSES	OM562	PTRAN	\$ 1,163,408	-	-	-	1,163,408
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	\$ 1,090,014	-	-	-	1,090,014
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	\$ 3,065,817	-	-	-	3,065,817
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	\$ 475,381	-	-	-	475,381
567 RENTS	OM567	PTRAN	\$ 24,701	-	-	-	24,701
568 MAINTENACE SUPERVISION AND ENG	OM568	PTRAN	\$ 647,227	-	-	-	647,227
569 STRUCTURES	OM569	PTRAN	\$ 26,913	-	-	-	26,913
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	\$ 1,936,760	-	-	-	1,936,760
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	\$ 2,876,462	-	-	-	2,876,462
572 UNDERGROUND LINES	OM572	PTRAN	\$ -	-	-	-	-
573 MISC PLANT	OM573	PTRAN	\$ 97,880	-	-	-	97,880
Total Transmission Expenses			\$ 13,736,318	\$ -	\$ -	\$ -	\$ 13,736,318
Distribution Operation Expense							
580 OPERATION SUPERVISION AND ENGI	OM580	LBDO	\$ -	-	-	-	-
581 LOAD DISPATCHING	OM581	PDIST	\$ -	-	-	-	-
582 STATION EXPENSES	OM582	PDIST	\$ -	-	-	-	-
583 OVERHEAD LINE EXPENSES	OM583	PDIST	\$ -	-	-	-	-
584 UNDERGROUND LINE EXPENSES	OM584	PDIST	\$ -	-	-	-	-
585 STREET LIGHTING EXPENSE	OM585	PDIST	\$ -	-	-	-	-
586 METER EXPENSES	OM586	PDIST	\$ -	-	-	-	-
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	PDIST	\$ -	-	-	-	-
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	PDIST	\$ -	-	-	-	-
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	\$ -	-	-	-	-
588 MISC DISTR EXP - MAPPIN	OM588x	PDIST	\$ -	-	-	-	-
589 RENTS	OM589	PDIST	\$ -	-	-	-	-
Total Distribution Operation Expense	OMDO		\$ -	\$ -	\$ -	\$ -	\$ -

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Operation and Maintenance Expenses (Continued)							
Distribution Maintenance Expense							
590 MAINTENANCE SUPERVISION AND EN	OM590	LBDM	\$ -	-	-	-	-
591 STRUCTURES	OM591	PDIST	\$ -	-	-	-	-
592 MAINTENANCE OF STATION EQUIPME	OM592	PDIST	\$ -	-	-	-	-
593 MAINTENANCE OF OVERHEAD LINES	OM593	PDIST	\$ -	-	-	-	-
594 MAINTENANCE OF UNDERGROUND LIN	OM594	PDIST	\$ -	-	-	-	-
595 MAINTENANCE OF LINE TRANSFORME	OM595	PDIST	\$ -	-	-	-	-
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	PDIST	\$ -	-	-	-	-
597 MAINTENANCE OF METERS	OM597	PDIST	\$ -	-	-	-	-
598 MISCELLANEOUS DISTRIBUTION EXPENSES	OM598	PDIST	\$ -	-	-	-	-
Total Distribution Maintenance Expense	OMDM		\$ -	\$ -	\$ -	\$ -	\$ -
Total Distribution Operation and Maintenance Expenses			-	-	-	-	-
Transmission and Distribution Expenses			13,736,318	-	-	-	13,736,318
Production, Transmission and Distribution Expenses	OMSUB		\$ 416,737,971	\$ 96,364,241	\$ 306,637,411	\$ -	\$ 13,736,318
Customer Accounts Expense							
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	\$ -	-	-	-	-
902 METER READING EXPENSES	OM902	F025	\$ -	-	-	-	-
903 RECORDS AND COLLECTION	OM903	F025	\$ -	-	-	-	-
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	\$ -	-	-	-	-
905 MISC CUST ACCOUNTS	OM903	F025	\$ -	-	-	-	-
Total Customer Accounts Expense	OMCA		\$ -	\$ -	\$ -	\$ -	\$ -
Customer Service Expense							
907 SUPERVISION	OM907	TUP	\$ -	-	-	-	-
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	\$ 591,192	517,058	-	-	74,133
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	\$ -	-	-	-	-
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	\$ -	-	-	-	-
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	\$ -	-	-	-	-
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	\$ -	-	-	-	-
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	\$ -	-	-	-	-
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	\$ -	-	-	-	61,206
913 ADVERTISING EXPENSES	OM913	TUP	\$ 488,103	426,897	-	-	-
915 MDSE-JOBGING-CONTRACT	OM915	TUP	\$ -	-	-	-	-
916 MISC SALES EXPENSE	OM916	TUP	\$ -	-	-	-	-
Total Customer Service Expense	OMCS		\$ 1,079,295	\$ 943,955	\$ -	\$ -	\$ 135,340
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2		417,817,266	97,308,197	306,637,411	-	13,871,658

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
<u>Operation and Maintenance Expenses (Continued)</u>							
Administrative and General Expense							
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	\$ 14,315,713	6,663,061	5,595,161	-	2,057,491
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	\$ 6,915,648	3,218,798	2,702,915	-	993,935
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	\$ -	-	-	-	-
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	\$ 3,954,189	1,840,425	1,545,457	-	568,306
924 PROPERTY INSURANCE	OM924	TUP	\$ -	-	-	-	-
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	\$ 179,889	83,727	70,308	-	25,854
926 EMPLOYEE BENEFITS	OM926	LBSUB9	\$ 169,663	78,967	66,311	-	24,384
927 FRANCHISE REQUIREMENTS	OM927	TUP	\$ -	-	-	-	-
928 REGULATORY COMMISSION FEES	OM928	TUP	\$ 1,188,958	1,039,867	-	-	149,091
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	\$ -	-	-	-	-
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	\$ 1,686,131	784,788	659,008	-	242,335
931 RENTS AND LEASES	OM931	PGP	\$ 1,933	1,694	-	-	239
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	\$ 208,156	182,450	-	-	25,706
Total Administrative and General Expense	OMAG		\$ 28,620,280	\$ 13,893,778	\$ 10,639,160	\$ -	\$ 4,087,342
Total Operation and Maintenance Expenses	TOM		\$ 446,437,546	\$ 111,201,975	\$ 317,276,572	\$ -	\$ 17,959,000
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP		\$ 224,914,919	\$ 111,201,975	\$ 95,753,945	\$ -	\$ 17,959,000

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
 October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses							
Steam Power Generation Operation Expenses							
500 OPERATION SUPERVISION & ENGINEERING	LB500	PROFIX	\$ 4,967,667	4,967,667	-	-	-
501 FUEL	LB501	Energy	\$ 3,889,944	-	3,889,944	-	-
502 STEAM EXPENSES	LB502	PROFIX	\$ 9,023,322	9,023,322	-	-	-
505 ELECTRIC EXPENSES	LB505	PROFIX	\$ 4,523,897	4,523,897	-	-	-
506 MISC. STEAM POWER EXPENSES	LB506	PROFIX	\$ 940,518	940,518	-	-	-
507 RENTS	LB507	PROFIX	\$ -	-	-	-	-
509 ALLOWANCES	LB509	Energy	\$ -	-	-	-	-
Total Steam Power Operation Expenses	LBSUB1		\$ 23,345,348	\$ 19,455,404	\$ 3,889,944	\$ -	\$ -
Steam Power Generation Maintenance Expenses							
510 MAINTENANCE SUPERVISION & ENGINEERING	LB510	Energy	\$ 3,623,969	-	3,623,969	-	-
511 MAINTENANCE OF STRUCTURES	LB511	PROFIX	\$ 986,831	986,831	-	-	-
512 MAINTENANCE OF BOILER PLANT	LB512	Energy	\$ 8,700,235	-	8,700,235	-	-
513 MAINTENANCE OF ELECTRIC PLANT	LB513	Energy	\$ 1,595,642	-	1,595,642	-	-
514 MAINTENANCE OF MISC STEAM PLANT	LB514	PROFIX	\$ 200,886	200,886	-	-	-
Total Steam Power Generation Maintenance Expense	LBSUB2		\$ 15,107,564	\$ 1,187,718	\$ 13,919,846	\$ -	\$ -
Total Steam Power Generation Expense			\$ 38,452,913	\$ 20,643,122	\$ 17,809,791	\$ -	\$ -

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
 October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses (Continued)							
Other Power Generation Operation Expense							
546 OPERATION SUPERVISION & ENGINEERING	LB546	PROFIX	\$ -	-	-	-	-
547 FUEL	LB547	Energy	\$ -	-	-	-	-
548 GENERATION EXPENSE	LB548	PROFIX	\$ -	-	-	-	-
549 MISC OTHER POWER GENERATION	LB549	PROFIX	\$ -	-	-	-	-
550 RENTS	LB550	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Expenses	LBSUB7		\$ -	\$ -	\$ -	\$ -	\$ -
Other Power Generation Maintenance Expense							
551 MAINTENANCE SUPERVISION & ENGINEERING	LB551	PROFIX	\$ -	-	-	-	-
552 MAINTENANCE OF STRUCTURES	LB552	PROFIX	\$ -	-	-	-	-
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB553	PROFIX	\$ 89,555	89,555	-	-	-
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	LB554	PROFIX	\$ -	-	-	-	-
Total Other Power Generation Maintenance Expense	LBSUB8		\$ 89,555	\$ 89,555	\$ -	\$ -	\$ -
Total Other Power Generation Expense			\$ 89,555	\$ 89,555	\$ -	\$ -	\$ -
Total Production Expense	LPREX		\$ 38,542,468	\$ 20,732,677	\$ 17,809,791	\$ -	\$ -

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses (Continued)							
Purchased Power							
555 PURCHASED POWER Energy	LB555	OMPP	\$ -	-	-	-	-
555 PURCHASED POWER Demand	LBD555	OMPPD	\$ -	-	-	-	-
555 PURCHASED POWER OPTIONS	LBO555	OMPP	\$ -	-	-	-	-
555 BROKERAGE FEES	LBB555	OMPP	\$ -	-	-	-	-
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	\$ -	-	-	-	-
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	\$ -	-	-	-	-
557 OTHER EXPENSES	LB557	PROFIX	\$ -	-	-	-	-
558 DUPLICATE CHARGES	LB558	Energy	\$ -	-	-	-	-
Total Purchased Power Labor	LBPP		\$ -	\$ -	\$ -	\$ -	\$ -
Transmission Labor Expenses							
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	\$ 835,977	-	-	-	835,977
561 LOAD DISPATCHING	LB561	PTRAN	\$ 1,304,969	-	-	-	1,304,969
562 STATION EXPENSES	LB562	PTRAN	\$ 598,382	-	-	-	598,382
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	\$ 236,393	-	-	-	236,393
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	\$ -	-	-	-	-
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	\$ 312,375	-	-	-	312,375
567 RENTS	LB567	PTRAN	\$ -	-	-	-	-
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	\$ 644,925	-	-	-	644,925
569 MAINTENACE OF STRUCTURES	LB569	PTRAN	\$ 318	-	-	-	318
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	\$ 1,433,304	-	-	-	1,433,304
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	\$ 1,067,766	-	-	-	1,067,766
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	\$ 46,439	-	-	-	46,439
Total Transmission Labor Expenses	LBTRAN		\$ 6,480,848	\$ -	\$ -	\$ -	\$ 6,480,848
Distribution Operation Labor Expense							
580 OPERATION SUPERVISION AND ENGI	LB580	F023	\$ -	-	-	-	-
581 LOAD DISPATCHING	LB581	PDIST	\$ -	-	-	-	-
582 STATION EXPENSES	LB582	PDIST	\$ -	-	-	-	-
583 OVERHEAD LINE EXPENSES	LB583	PDIST	\$ -	-	-	-	-
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	\$ -	-	-	-	-
585 STREET LIGHTING EXPENSE	LB585	PDIST	\$ -	-	-	-	-
586 METER EXPENSES	LB586	PDIST	\$ -	-	-	-	-
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	\$ -	-	-	-	-
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	\$ -	-	-	-	-
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	\$ -	-	-	-	-
589 RENTS	LB589	PDIST	\$ -	-	-	-	-
Total Distribution Operation Labor Expense	LBDO		\$ -	\$ -	\$ -	\$ -	\$ -

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
 October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses (Continued)							
Distribution Maintenance Labor Expense							
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	\$ -	-	-	-	-
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	\$ -	-	-	-	-
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	\$ -	-	-	-	-
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	\$ -	-	-	-	-
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	\$ -	-	-	-	-
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	\$ -	-	-	-	-
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	\$ -	-	-	-	-
597 MAINTENANCE OF METERS	LB597	PDIST	\$ -	-	-	-	-
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	\$ -	-	-	-	-
Total Distribution Maintenance Labor Expense	LBDM		\$ -	\$ -	\$ -	\$ -	\$ -
Total Distribution Operation and Maintenance Labor Expenses		PDIST					6,480,848
Transmission and Distribution Labor Expenses			6,480,848				
Production, Transmission and Distribution Labor Expenses	LBSUB		\$ 45,023,316	\$ 20,732,677	\$ 17,809,791	\$ -	\$ 6,480,848
Customer Accounts Expense							
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	\$ -	-	-	-	-
902 METER READING EXPENSES	LB902	F025	\$ -	-	-	-	-
903 RECORDS AND COLLECTION	LB903	F025	\$ -	-	-	-	-
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	\$ -	-	-	-	-
905 MISC CUST ACCOUNTS	LB903	F025	\$ -	-	-	-	-
Total Customer Accounts Labor Expense	LBCA		\$ -	\$ -	\$ -	\$ -	\$ -
Customer Service Expense							
907 SUPERVISION	LB907	TUP	\$ -	-	-	-	68,292
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	\$ 544,608	476,316	-	-	-
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	\$ -	-	-	-	-
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	\$ -	-	-	-	-
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	\$ -	-	-	-	-
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	\$ -	-	-	-	-
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	\$ -	-	-	-	-
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	\$ -	-	-	-	-
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	\$ -	-	-	-	-
915 MDSE-JOBING-CONTRACT	LB915	TUP	\$ -	-	-	-	-
916 MISC SALES EXPENSE	LB916	TUP	\$ -	-	-	-	-
Total Customer Service Labor Expense	LBCS		\$ 544,608	\$ 476,316	\$ -	\$ -	\$ 68,292
Sub-Total Labor Exp	LBSUB9		45,567,924	21,208,994	17,809,791	-	6,549,140

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Labor Expenses (Continued)							
Administrative and General Expense							
920 ADMIN. & GEN. SALARIES-	LB920	LBSUB9	\$ 14,315,714	6,663,061	5,595,161	-	2,057,491
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB9	\$ -	-	-	-	-
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB922	LBSUB9	\$ -	-	-	-	-
923 OUTSIDE SERVICES EMPLOYED	LB923	LBSUB9	\$ -	-	-	-	-
924 PROPERTY INSURANCE	LB924	TUP	\$ -	-	-	-	-
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB9	\$ 27,509	12,804	10,752	-	3,954
926 EMPLOYEE BENEFITS	LB926	LBSUB9	\$ 17,136	7,976	6,698	-	2,463
928 REGULATORY COMMISSION FEES	LB928	TUP	\$ -	-	-	-	-
929 DUPLICATE CHARGES-CR	LB929	LBSUB9	\$ -	-	-	-	-
930 MISCELLANEOUS GENERAL EXPENSES	LB930	LBSUB9	\$ -	-	-	-	-
931 RENTS AND LEASES	LB931	PGP	\$ -	-	-	-	-
935 MAINTENANCE OF GENERAL PLANT	LB935	PGP	\$ 74,927	65,674	-	-	9,253
Total Administrative and General Expense	LBAG		\$ 14,435,286	\$ 6,749,515	\$ 5,612,610	\$ -	\$ 2,073,161
Total Operation and Maintenance Expenses	TLB		\$ 60,003,210	\$ 27,958,509	\$ 23,422,401	\$ -	\$ 8,622,301
Operation and Maintenance Expenses Less Purchase Power	LBLPP		\$ 60,003,210	\$ 27,958,509	\$ 23,422,401	\$ -	\$ 8,622,301

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Other Expenses							
Depreciation Expenses							
Production	DEPRDP2	PPROD	\$ 28,815,395	28,815,395	-	-	-
Transmission	DEPRDP3	PTRAN	\$ 5,182,459	-	-	-	5,182,459
Transmission	DEPRDP4	PTRAN	\$ -	-	-	-	-
Distribution	DEPRDP5	PDIST	\$ -	-	-	-	-
General & Common Plant	DEPRDP6	PGP	\$ 238,155	208,744	-	-	29,411
Other Plant	DEPROTH	TPIS	\$ -	-	-	-	-
Total Depreciation Expense	TDEPR		\$ 34,236,009	29,024,140	-	-	5,211,869
Accretion Expense							
Production	ACRTNP	F017	\$ -	-	-	-	-
Transmission	ACRTNT	PTRAN	\$ -	-	-	-	-
Distribution	ACRTND	PDIST	\$ -	-	-	-	-
Total Accretion Expense	TACRTN		\$ -	\$ -	\$ -	\$ -	\$ -
Property Taxes & Other	PTAX	TUP	\$ (94,563)	(82,705)	-	-	(11,858)
Amortization of Investment Tax Credit	OTAX	TUP	\$ -	-	-	-	-
Other Expenses	OT	TUP	\$ (365,864)	(319,986)	-	-	(45,878)
Interest	INTLTD	TUP	\$ 47,622,710	41,650,995	-	-	5,971,715
Other Deductions	DEDUCT	TUP	\$ 109,257	95,557	-	-	13,700
Total Other Expenses	TOE		\$ 81,507,549	\$ 70,368,000	\$ -	\$ -	\$ 11,139,549
Total Cost of Service (O&M + Other Expenses)			\$ 527,945,095	\$ 181,569,975	\$ 317,276,572	\$ -	\$ 29,098,548

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Functional Assignment and Classification

12 Months Ended
 October 2010

Description	Name	Functional Vector	Total System	Production Demand	Production Energy	Steam Direct	Transmission Demand
Functional Vectors							
Production Plant	F001		1.000000	1.000000	0.000000	0.000000	0.000000
Transmission Plant	F002		1.000000	0.000000	0.000000	0.000000	1.000000
Distribution Plant	F003		1.000000	0.000000	0.000000	0.000000	0.000000
Production Plant	F017		1.000000	0.000000	1.000000	0.000000	0.000000
Provar	PROVAR		1.000000	1.000000	0.000000	0.000000	0.000000
PROFIX	PROFIX		-	-	-	-	-
Distribution Operation Labor	F023		-	-	-	-	-
Distribution Maintenance Labor	F024		1.000000	0.000000	0.000000	0.000000	1.000000
Customer Accounts Expense	F025		1.000000	0.000000	0.000000	0.000000	1.000000
Customer Service Expense	F026		1.000000	0.000000	1.000000	0.000000	0.000000
Purchased Power Energy	OMPP		1.000000	0.000000	0.000000	0.000000	0.000000
Purchased Power Demand	OMPPD		1.000000	1.000000	0.000000	0.000000	0.000000
Purchased Power BREC Share of HMP&L Station Two	OMPPH		58,293,374	13,175,571	45,117,803	0.000000	0.000000
Production Energy	Energy		1.000000	0.000000	1.000000	0.000000	0.000000
Internally Generated Functional Vectors							
Total Prod, Trans, and Dist Plant	PT&D		1.000000	0.876506	-	-	0.123494
Total Transmission Plant	PTRAN		1.000000	-	0.425734	-	0.079848
Operation and Maintenance Expenses Less Purchase Power	OMLPP		1.000000	0.494418	-	-	0.123494
Total Plant in Service	TPIS		1.000000	0.876506	-	-	0.143697
Total Operation and Maintenance Expenses (Labor)	TLB		1.000000	0.465950	0.390352	-	0.033200
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	TMSUB2		1.000000	0.232897	0.733903	-	-
Total Steam Power Operation Expenses (Labor)	LBSUB1		1.000000	0.833374	0.166626	-	-
Total Steam Power Generation Maintenance Expense (Labor)	LBSUB2		1.000000	0.078617	0.921383	-	1.000000
Total Transmission Labor Expenses	LBTRAN		1.000000	-	-	-	0.143723
Sub-Total Labor Exp	LBSUB7		1.000000	0.465437	0.390841	-	0.123494
Total General Plant	PGP		1.000000	0.876506	-	-	-
Total Production Plant	PPROD		1.000000	1.000000	-	-	0.123494
Total Intangible Plant	INTPLT		1.000000	0.876506	-	-	-

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Rate Schedule Allocation
12 Months Ended
October 2010

12 CP - Smelter TIER Adjustment Revenues @ \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Cost of Service Summary -- Unadjusted							
Operating Revenues							
Sales to Members		REVUC	R01	\$ 110,934,700	\$ 39,110,620	\$ 282,406,135	\$ 432,451,455
Off System Sales Revenue			OSSALL	\$ 12,699,401	\$ 4,615,345	\$ 59,229,055	\$ 76,543,801
Income from Leased Property Net			OTHREV	\$ 45,976	\$ 12,696	\$ 91,001	\$ 149,673
Other Operating Revenue & Income			RBPLT	\$ 4,232,544	\$ 1,168,737	\$ 8,377,465	\$ 13,778,745
Total Operating Revenues			TOR	\$ 127,912,621	\$ 44,907,398	\$ 350,103,656	\$ 522,923,675
Operating Expenses							
Operation and Maintenance Expenses				\$ 117,027,890	\$ 39,919,424	\$ 289,490,232	\$ 446,437,546
Depreciation and Amortization Expenses				\$ 10,542,673	\$ 2,902,642	\$ 20,790,694	\$ 34,236,009
Property and Other Taxes			NPT	\$ (29,120)	\$ (8,017)	\$ (57,426)	\$ (94,563)
Total Operating Expenses			TOE	\$ 127,541,444	\$ 42,814,048	\$ 310,223,500	\$ 480,578,992
Utility Operating Margin				\$ 371,177	\$ 2,093,350	\$ 39,880,156	\$ 42,344,683
Non-Operating Items							
Interest Income			RBPLT	\$ -	\$ -	\$ -	\$ -
Other Non-Operating Income			RBPLT	\$ -	\$ -	\$ -	\$ -
Other Credits			RBPLT	\$ -	\$ -	\$ -	\$ -
Interest on Long Term Debt				\$ -	\$ -	\$ -	\$ -
Other Interest Expense			RBPLT	\$ -	\$ -	\$ -	\$ -
Other Deductions			RBPLT	\$ -	\$ -	\$ -	\$ -
Total Non-Operating Items				\$ -	\$ -	\$ -	\$ -
Net Utility Operating Margin			TOM	\$ 371,177	\$ 2,093,350	\$ 39,880,156	\$ 42,344,683
Net Cost Rate Base				\$ 359,504,551	\$ 99,270,357	\$ 711,566,594	\$ 1,170,341,502

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Rate Schedule Allocation
12 Months Ended
October 2010
12 CP - Smelter TIER Adjustment Revenues @ \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Cost of Service Summary – Pro-Forma							
Operating Revenues							
Total Operating Revenue				\$ 127,912,621	\$ 44,907,398	\$ 350,103,656	\$ 522,923,675
Pro-Forma Adjustments:							
To annualize revenue for new industrial customer	2.01			\$ -	\$ 149,752	\$ -	\$ 149,752
To adjust mismatch in fuel cost recovery	2.02	FACREV		\$ (25,166,503)	\$ (9,525,471)	\$ (73,123,203)	\$ (107,815,177)
To eliminate Environmental Surcharge revenues	2.03	ESREV		\$ (5,315,462)	\$ (2,025,233)	\$ (15,493,538)	\$ (22,834,232)
To reflect temperature normalized sales volumes	2.04		EnergyR	\$ (421,610)	\$ -	\$ -	\$ (421,610)
To eliminate Non-FAC PPA revenues	2.05	NFPR		\$ 2,757,108	\$ 1,045,800	\$ 7,785,109	\$ 11,588,017
To eliminate WKEC Lease Expenses	2.19		RBPLT	\$ (45,976)	\$ (12,696)	\$ (91,001)	\$ (149,673)
To eliminate RRI Domtar Cogen Backup revenues	2.09			\$ -	\$ (1,115,159)	\$ -	\$ (1,115,159)
To adjust for Smelter TIER Adjustment Charge	2.22			\$ -	\$ -	\$ -	\$ -
Total Pro-Forma Operating Revenue				\$ 99,720,178	\$ 33,424,391	\$ 269,181,024	\$ 402,325,592

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Rate Schedule Allocation
12 Months Ended
October 2010
12 CP - Smelter TIER Adjustment Revenues @ \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Cost of Service Summary -- Pro-Forma							
Operating Expenses				\$ 117,027,890	\$ 39,919,424	\$ 289,490,232	\$ 446,437,546
Operation and Maintenance Expenses				\$ 10,542,673	\$ 2,902,642	\$ 20,790,694	\$ 34,236,009
Depreciation and Amortization Expenses			NPT	\$ (29,120)	\$ (8,017)	\$ (57,426)	\$ (94,563)
Property and Other Taxes							110,607
Adjustments to Operating Expenses:					\$ 110,607	\$ -	\$ (110,040,523)
To annualize expenses for new industrial customer	2.01		FACREV	\$ (25,685,949)	\$ (9,722,081)	\$ (74,632,493)	\$ (23,467,791)
To adjust mismatch in fuel cost recovery	2.02		ESREV	\$ (5,462,944)	\$ (2,081,425)	\$ (15,923,422)	\$ (295,293)
To eliminate Environmental Surcharge expenses	2.03		EnergyR	\$ (295,293)	\$ -	\$ -	\$ 12,015,173
To reflect weather normalized sales volumes	2.04		NFPR	\$ 2,858,740	\$ 1,084,350	\$ 8,072,083	\$ 6,252,651
To eliminate Non-FAC PPA expenses	2.05		PLT	\$ 1,925,448	\$ 530,120	\$ 3,797,082	\$ 624,894
To reflect annualized depreciation expenses	2.06		LBPLT	\$ 174,259	\$ 53,897	\$ 396,739	\$ 515,767
To reflect increases in labor and labor-related costs	2.07		PLT	\$ 158,826	\$ 43,728	\$ 313,213	\$ (2,086,416)
To reflect current interest on construction (CWIP)	2.08		PLT	\$ -	\$ (2,086,416)	\$ -	\$ 5,660,678
To eliminate RRI Domtar Cogen Backup expenses	2.09		CP	\$ 1,743,155	\$ 479,931	\$ 3,437,592	\$ 2,726,965
To reflect leveled production expenses	2.10		CP	\$ 839,745	\$ 231,201	\$ 1,656,019	\$ 292,194
To reflect leveled production expenses	2.11		RBPLT	\$ 89,756	\$ 24,784	\$ 177,654	\$ 281,719
To reflect going forward Information Technology support services	2.12		RBPLT	\$ 86,538	\$ 23,896	\$ 171,285	\$ 5,415,000
To reflect amortization of rate case expenses	2.13		12CPTR	\$ 1,667,501	\$ 459,102	\$ 3,288,398	\$ 70,408
To reflect MISO related expenses	2.14		RBPLT	\$ 21,628	\$ 5,972	\$ 42,808	\$ (128,368)
To annualize interest on long-term debt	2.15		LBPLT	\$ (35,797)	\$ (11,072)	\$ (81,500)	\$ (936,815)
To reflect leased property income (Soaper Building Rent)	2.16		LBPLT	\$ (288,484)	\$ (79,426)	\$ (568,905)	\$ 205,090
To adjust for costs related to LEM Dispatch	2.17		CP	\$ 63,156	\$ 17,388	\$ 124,546	\$ (1,000,000)
To adjust for costs related to APM	2.18		CP	\$ (725,000)	\$ (275,000)	\$ -	\$ (180,775)
To reflect going forward level of Outside Services	2.25		EnergyNS	\$ (55,530)	\$ (15,334)	\$ (109,911)	\$ (771,118)
To eliminate costs for SFPC membership	2.20		RBPLT	\$ (237,459)	\$ (65,378)	\$ (468,281)	\$ 1,000,000
To adjust for MISO Case-related expenses	2.21		12CPTR	\$ 725,000	\$ 275,000	\$ -	\$ (507,216)
To reflect commitment to Energy Efficiency Programs	2.26		EnergyNS	\$ (130,114)	\$ (45,872)	\$ (331,230)	\$ 183,084
To eliminate promo advertising, lobbying, donation and econ dev	2.23		R01	\$ 56,379	\$ 15,522	\$ 111,182	\$ (104,060,084)
To reflect going forward level of income taxes	2.24		NTPLT	\$ (22,506,439)	\$ (11,026,504)	\$ (70,527,141)	\$ -
Total Expense Adjustments				\$ 105,035,005	\$ 31,787,544	\$ 239,696,360	\$ 376,518,908
Total Operating Expenses			TOE	\$ (5,314,827)	\$ 1,636,847	\$ 29,484,664	\$ 25,806,684
Utility Operating Margins -- Pro-Forma				\$ -	\$ -	\$ -	\$ -
Non-Operating Items				\$ -	\$ -	\$ -	\$ -
Total Non-Operating Items				\$ (5,314,827)	\$ 1,636,847	\$ 29,484,664	\$ 25,806,684
Net Utility Operating Margin				\$ 359,504,551	\$ 99,270,357	\$ 711,566,594	\$ 1,170,341,502
Net Cost Rate Base					1.65%	4.14%	2.21%
Return on Rate Base -- Utility Operating Margin Divided by Rate Base				-1.48%			

BIG RIVERS ELECTRIC CORPORATION
Cost of Service Study
Rate Schedule Allocation
12 Months Ended
October 2010
12 CP - Smelter TIER Adjustment Revenues @ \$1.95/mWh

Description	Ref	Name	Allocation Vector	Rurals	Large Industrials	Smelters	Total System
Subsidies Paid and Received at Present Rates							
(subsidies received shown as positive value)							
Rate Base				\$ 359,504,551	\$ 99,270,357	\$ 711,566,594	\$ 1,170,341,502
Operating Margins (present rates)				\$ (5,314,827)	\$ 1,636,847	\$ 29,484,664	\$ 25,806,684
Operating Margins at Equal Rate of Return	ROR	2.21%		\$ 7,927,276	\$ 2,188,967	\$ 15,690,441	\$ 25,806,684
Subsidies Paid and Received				\$ 13,242,103	\$ 552,120	\$ (13,794,223)	\$ 0

Big Rivers Electric Corporation
 Summary of Cost of Service Study
 For the 12 Months Ended October 2010

Rate of Return Summary

Unadjusted

Rate Schedule		Utility Operating Margins	Net Cost Rate Base	Rate of Return
Total Rural	\$	(5,314,827)	\$ 359,504,551	-1.48%
Total Large Industrial		1,636,847	99,270,357	1.65%
Total Smelter		29,484,664	711,566,594	4.14%
Total	\$	25,806,684	\$ 1,170,341,502	2.21%

Adjusted for Proposed Rate Increase

Rate Schedule		Utility Operating Margins	Net Cost Rate Base	Rate of Return
Total Rural	\$	8,857,176	\$ 359,504,551	2.46%
Total Large Industrial		4,865,413	99,270,357	4.90%
Total Smelter		52,038,060	711,566,594	7.31%
Total	\$	65,760,649	\$ 1,170,341,502	5.62%

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Plant in Service								
Intangible Plant	INTPLT	PT&D	\$ 66,895					
Production Plant	PPROD	F001	\$ 1,686,796,955					
Transmission Plant	PTRAN	F002	\$ 237,659,206					
Distribution Plant	PDIST	F003	\$ -					
Total Production & Transmission Plant			\$ 1,924,456,160					
General Plant	PGP	PT&D	\$ 18,511,051					
Total Plant in Service	TPIS		\$ 1,943,034,107					
Construction Work in Progress (CWIP)								
CWIP Production	CWIP1	PPROD	\$ 22,411,274					
CWIP Transmission	CWIP2	PTRAN	\$ 7,475,859					
CWIP Distribution Plant	CWIP3	PDIST	\$ -					
CWIP General Plant	CWIP4	PT&D	\$ 16,915,005					
Total Construction Work in Progress	TCWIP		\$ 46,802,138					
Total Utility Plant			\$ 1,989,836,245					
Rate Base								
Total Utility Plant	TUP		\$ 1,989,836,245					
Less: Accumulated Provision for Depreciation								
Production	ADEPREPA	PPROD	\$ 790,847,523					
Transmission	ADEPRTP	PTRAN	\$ 107,564,747					
Distribution	ADEPRD11	PDIST	\$ -					
General & Common Plant	ADEPRD12	PT&D	\$ 6,300,770					
Intangible, Misc. and Other Plant	ADEPRGP	PT&D	\$ -					
Retirement Work In Progress	ADEPRRT	PT&D	\$ -					
Total Accumulated Depreciation	TADEPR		\$ 904,713,040					
	NTPLANT		\$ 1,085,123,206					
Net Utility Plant								
Working Capital								
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP	\$ 28,114,365					
Materials and Supplies	M&S	TPIS	\$ 22,777,820	20327197.9	85340.04	-68898.4	208485.44	-95121.11
Fuel Stock	PREPAY	TPIS	\$ 34,326,112	39158400.85	-1328756.9	-4130766.79	-359777.13	1918732.52
Total Working Capital	TWC		\$ 85,218,297					
Net Rate Base	RB		\$ 1,170,341,502					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
<u>Plant in Service</u>								
Intangible Plant	INTPLT	PT&D						
Production Plant	PPROD	F001						
Transmission Plant	PTRAN	F002						
Distribution Plant	PDIST	F003						
Total Production & Transmission Plant		PT&D						
General Plant	PGP	PT&D						
Total Plant in Service		TPIS						
<u>Construction Work in Progress (CWIP)</u>								
CWIP Production	CWIP1	PPROD						
CWIP Transmission	CWIP2	PTRAN						
CWIP Distribution Plant	CWIP3	PDIST						
CWIP General Plant	CWIP4	PT&D						
Total Construction Work in Progress		TCWIP						
Total Utility Plant								
<u>Rate Base</u>								
Total Utility Plant		TUP						
<u>Less: Accumulated Provision for Depreciation</u>								
Production	ADEPREPA	PPROD						
Transmission	ADEPRTP	PTRAN						
Distribution	ADEPRD11	PDIST						
General & Common Plant	ADEPRD12	PT&D						
Intangible, Misc, and Other Plant	ADEPRGP	PT&D						
Retirement Work In Progress	ADEPRRT	PT&D						
Total Accumulated Depreciation		TADEPR						
Net Utility Plant		NTPLANT						
<u>Working Capital</u>								
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP						
Materials and Supplies	M&S	TPIS	-220183.19	207004.7	357212.07	240129.05	-144241.07	2889566.56
Fuel Stock	PREPAY	TPIS	2552249.61	867432.81	-287963.1	-3463026.24	-2018344.81	-578882.38
Total Working Capital		TWC						
Net Rate Base		RB						

Description	Name	Functional Vector	October 2010
<u>Plant in Service</u>			
Intangible Plant	INTPLT	PT&D	
Production Plant	PPROD	F001	
Transmission Plant	PTRAN	F002	
Distribution Plant	PDIST	F003	
Total Production & Transmission Plant	PT&D		
General Plant	PGP	PT&D	
Total Plant in Service	TPIS		
<u>Construction Work in Progress (CWIP)</u>			
CWIP Production	CWIP1	PPROD	
CWIP Transmission	CWIP2	PTRAN	
CWIP Distribution Plant	CWIP3	PDIST	
CWIP General Plant	CWIP4	PT&D	
Total Construction Work in Progress	TCWIP		
Total Utility Plant			
<u>Rate Base</u>			
Total Utility Plant	TUP		
<u>Less: Accumulated Provision for Depreciation</u>			
Production	ADEPREPA	PPROD	
Transmission	ADEPRTP	PTRAN	
Distribution	ADEPRD11	PDIST	
General & Common Plant	ADEPRD12	PT&D	
Intangible, Misc, and Other Plant	ADEPRGP	PT&D	
Retirement Work In Progress	ADEPRRT	PT&D	
Total Accumulated Depreciation	TADEPR		
Net Utility Plant	NTPLANT		
<u>Working Capital</u>			
Cash Working Capital - Operation and Maintenance Expenses	CWC	OMLPP	
Materials and Supplies	M&S	TPIS	-1008672.24
Fuel Stock	PREPAY	TPIS	1996813.82
Total Working Capital	TWC		
Net Rate Base	RB		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Operation and Maintenance Expenses								
Steam Power Generation Operation Expenses								
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	\$ 4,974,566	342962.62	1034901.09	358703.86	318491.34	384828.47
501 FUEL	OM501	Energy	\$ 200,919,367	11957675.62	16736745.89	19103323.18	17630280.19	17173097.35
502 STEAM EXPENSES	OM502	PROFIX	\$ 34,453,882	2424633.22	2490999.61	2647322.04	2676616.85	2911578.89
505 ELECTRIC EXPENSES	OM505	PROFIX	\$ 5,730,122	399281.19	656713.94	477935.99	489102.92	443771.24
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	\$ 7,451,302	837237.41	458663.32	531778.12	516078.68	646116.36
507 RENTS	OM507	PROFIX	\$ -		0	0	0	0
509 ALLOWANCES	OM509	Energy	\$ 429,682		0	0	55382.46	42291.31
Total Steam Power Operation Expenses			\$ 253,958,921	\$ 7,775	\$ 146,296	\$ 7,154	\$ 15,852	\$ 21,245
Steam Power Generation Maintenance Expenses								
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	\$ 3,631,867	301562.96	282674.01	282136.07	286174.73	324812.85
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	\$ 3,346,806	-2396.3	561809.41	164027.98	219884.17	122851.74
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	\$ 30,113,309	2665049.9	2707987.08	1617573	1413359.02	2039706.29
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	\$ 6,251,804	2443905.77	804364.44	-26124.91	190619.56	167015.92
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	\$ 877,364	136355.09	154030.5	71461.85	48046.95	35868.33
Total Steam Power Generation Maintenance Expense			\$ 44,221,151	\$ 3,659	\$ 7,366	\$ 1,455	\$ 6,057	\$ 9,772
Total Steam Power Generation Expense			\$ 298,180,072					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Operation and Maintenance Expenses								
Steam Power Generation Operation Expenses								
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	338223.38	414283.22	372420.21	359404.38	369945.71	334708.35
501 FUEL	OM501	Energy	15868543.13	15412621.99	16949864.35	18643264.65	19588180.27	17004762.52
502 STEAM EXPENSES	OM502	PROFIX	2801318.34	3017168.8	3110448.48	3022221.22	3095094.21	3132173.1
505 ELECTRIC EXPENSES	OM505	PROFIX	430459.27	473960.9	440316.02	456264.08	479912.75	476352.39
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	557984.26	577686.56	640171.09	585642.46	806920.28	725866.29
507 RENTS	OM507	PROFIX	0	0	0	0	0	0
509 ALLOWANCES	OM509	Energy	33437.63	31618.94	46952.89	62169.21	49573.1	28256.05
Total Steam Power Operation Expenses			\$ 6,070	\$ 8,052	\$ 5,213	\$ 267,644	\$ 167,124	\$ 44,089
Steam Power Generation Maintenance Expenses								
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	297530.92	289425	297802.77	281476.85	309430.59	294029.27
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	153063.03	309779.07	306987.02	458108.12	372678.29	488354.6
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	1740181.45	2535024.61	2164789.64	2054585.86	2034329.79	2855272.84
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	313812.24	389518.49	251988.71	302199.64	422000.23	534239.62
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	61896.28	58285.06	85932.24	51800.09	89344.85	66090.33
Total Steam Power Generation Maintenance Expense			\$ (325)	\$ 4,943	\$ 216,501	\$ 175,754	\$ 65,241	\$ 96,186
Total Steam Power Generation Expense								

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Operation and Maintenance Expenses			
Steam Power Generation Operation Expenses			
500 OPERATION SUPERVISION & ENGINEERING	OM500	PROFIX	345693.85
501 FUEL	OM501	Energy	14851007.4
502 STEAM EXPENSES	OM502	PROFIX	3124307.14
505 ELECTRIC EXPENSES	OM505	PROFIX	506051.44
506 MISC. STEAM POWER EXPENSES	OM506	PROFIX	567156.95
507 RENTS	OM507	PROFIX	0
509 ALLOWANCES	OM509	Energy	80000.79
Total Steam Power Operation Expenses			\$ 44,882
Steam Power Generation Maintenance Expenses			
510 MAINTENANCE SUPERVISION & ENGINEERING	OM510	Energy	384811.34
511 MAINTENANCE OF STRUCTURES	OM511	PROFIX	191658.45
512 MAINTENANCE OF BOILER PLANT	OM512	Energy	6285449.98
513 MAINTENANCE OF ELECTRIC PLANT	OM513	Energy	458264.77
514 MAINTENANCE OF MISC STEAM PLANT	OM514	PROFIX	18252.47
Total Steam Power Generation Maintenance Expense			\$ 38,478
Total Steam Power Generation Expense			

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
<u>Operation and Maintenance Expenses (Continued)</u>								
Other Power Generation Operation Expense								
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	\$ -	0	0	0	0	0
547 FUEL	OM547	Energy	\$ 706,789	7379.85	135814.53	4779.27	13479.11	18872.46
548 GENERATION EXPENSE	OM548	PROFIX	\$ 34,608	394.54	10481.32	2375	2373	2373
549 MISC OTHER POWER GENERATION	OM549	PROFIX	\$ -	0	0	0	0	0
550 RENTS	OM550	PROFIX	\$ -	0	0	0	0	0
Total Other Power Generation Expenses			\$ 741,396	\$ (1)	\$ (0)	\$ 0	\$ 1	\$ 0
Other Power Generation Maintenance Expense								
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	\$ -	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	\$ -	0	0	0	0	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	\$ 625,088	3658.66	7365.41	1454.85	6056.77	9772.16
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	\$ -	0	0	0	0	0
Total Other Power Generation Maintenance Expense			\$ 625,088	\$ 0	\$ (0)	\$ (0)	\$ 0	\$ 0
Total Other Power Generation Expense			\$ 1,366,485					
Total Station Expense			\$ 299,546,557					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Operation and Maintenance Expenses (Continued)								
Other Power Generation Operation Expense								
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	0	0	0	0	0	0
547 FUEL	OM547	Energy	3696.82	5679.30	2839.60	265271.41	164750.42	41716.70
548 GENERATION EXPENSE	OM548	PROFIX	2373	2373.00	2373.00	2373.00	2373.00	2373.00
549 MISC OTHER POWER GENERATION	OM549	PROFIX	0	0	0	0	0	0
550 RENTS	OM550	PROFIX	0	0	0	0	0	0
Total Other Power Generation Expenses			\$ (0)	\$ 1	\$ (0)	\$ 0	\$ (0)	\$ 0
Other Power Generation Maintenance Expense								
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	0	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	0	0	0	0	0	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	-322.62	4943.09	216501.24	175754.02	65240.65	96186.42
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	0	0	0	0	0	0
Total Other Power Generation Maintenance Expense			\$ 2	\$ 0	\$ 1	\$ (0)	\$ (1)	\$ 0
Total Other Power Generation Expense								
Total Station Expense								

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Operation and Maintenance Expenses (Continued)			
Other Power Generation Operation Expense			
546 OPERATION SUPERVISION & ENGINEERING	OM546	PROFIX	0
547 FUEL	OM547	Energy	42509.14
548 GENERATION EXPENSE	OM548	PROFIX	2373.00
549 MISC OTHER POWER GENERATION	OM549	PROFIX	0
550 RENTS	OM550	PROFIX	0
Total Other Power Generation Expenses			\$ (0)
Other Power Generation Maintenance Expense			
551 MAINTENANCE SUPERVISION & ENGINEERING	OM551	PROFIX	0
552 MAINTENANCE OF STRUCTURES	OM552	PROFIX	0
553 MAINTENANCE OF GENERATING & ELEC PLANT	OM553	PROFIX	38477.63
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	OM554	PROFIX	0
Total Other Power Generation Maintenance Expense			\$ (0)
Total Other Power Generation Expense			
Total Station Expense			

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Operation and Maintenance Expenses (Continued)								
Other Power Supply Expenses								
555 PURCHASED POWER Energy	OM555	OMPP	\$ 19,466,790	3,827,952.61	2,536,760.36	1,913,169.62	941,370.11	911,294.71
555 PURCHASED POWER Demand	OMD555	OMPPD	\$ 4,210,045	350,837.07	350,837.07	350,837.07	350,837.07	350,837.07
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	\$ 58,293,374	4,582,937.26	5,054,161.64	4,549,698.12	4,432,913.73	4,763,164.98
555 PURCHASED POWER OPTIONS	OMO555	OMPP	\$ -	0	0	0	0	0
555 BROKERAGE FEES	OMB555	OMPP	\$ -	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	\$ -	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	\$ 909,422	143177.05	161775.92	84110.82	66492.87	77558.07
557 OTHER EXPENSES	OM557	PROFIX	\$ 20,575,465	2479520.29	2210820.92	1519858.99	1381956.22	1577347.72
558 DUPLICATE CHARGES	OM558	Energy	\$ -	0	0	0	0	0
Total Other Power Supply Expenses	TPP		\$ 103,455,096	11,384,424.28	10,314,355.91	8,417,674.62	7,173,570.00	7,680,202.55
Total Electric Power Generation Expenses			\$ 403,001,653					
Transmission Expenses								
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	\$ 876,815	159722.72	99111.49	64131.05	56493.74	71626.61
561 LOAD DISPATCHING	OM561	LBTRAN	\$ 1,454,938	245368.38	141741.21	113777.21	98967.65	113022.44
562 STATION EXPENSES	OM562	PTRAN	\$ 1,163,408	138650.41	111166.28	70289.35	78900.11	96317.14
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	\$ 1,090,014	116902.84	72507.66	91764.75	90248.86	92136.75
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	\$ 3,065,817	227372.33	270804.44	222495.76	313990.87	298157.74
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	\$ 475,381	82941.08	54676.78	40839.08	35322.18	39484.82
567 RENTS	OM567	PTRAN	\$ 24,701	2058.43	2058.43	2058.43	2058.43	2058.43
568 MAINTENACE SUPERVISION AND ENG	OM568	LBTRAN	\$ 647,227	120702.88	66051.02	48367.7	40149.83	53439.26
569 STRUCTURES	OM569	PTRAN	\$ 26,913	36.88	6259.34	0	1874.02	59.12
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	\$ 1,936,760	272171.89	208826.01	135405.37	165513.32	155839.56
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	\$ 2,876,462	318695.62	624358.63	20316.93	128651.35	134146
572 UNDERGROUND LINES	OM572	PTRAN	\$ -	0	0	0	0	0
573 MISC PLANT	OM573	PTRAN	\$ 97,880	8341.27	4665	3732.37	5821.94	34823.78
Total Transmission Expenses			\$ 13,736,318	1,692,964.73	1,662,226.29	813,178.00	1,017,992.30	1,091,111.65

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Operation and Maintenance Expenses (Continued)								
Other Power Supply Expenses								
555 PURCHASED POWER Energy	OM555	OMPP	1,360,105.55	2,595,157.16	1,414,751.54	1,276,714.40	516,721.89	613,253.53
555 PURCHASED POWER Demand	OMD555	OMPPD	350,837.07	350,837.07	350,837.07	350,837.07	350,837.07	350,837.07
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	5,098,546.01	4,460,755.81	4,842,232.95	5,325,056.85	5,088,921.31	4,972,622.48
555 PURCHASED POWER OPTIONS	OMO555	OMPP	0	0	0	0	0	0
555 BROKERAGE FEES	OMB555	OMPP	0	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	0	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	0	92094.61	73384.96	71377.18	39951.63	51309.82
557 OTHER EXPENSES	OM557	PROFIX	1535653.17	1420108.84	1438109.81	1546376.13	1542523.95	2323941.19
558 DUPLICATE CHARGES	OM558	Energy	0	0	0	0	0	0
Total Other Power Supply Expenses	TPP		8,345,141.80	8,918,953.49	8,119,316.33	8,570,361.63	7,538,955.85	8,311,964.09
Total Electric Power Generation Expenses								
Transmission Expenses								
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	59387.59	61734.83	72275.43	57830.16	52970.2	70253.05
561 LOAD DISPATCHING	OM561	LBTRAN	89896.48	94173.59	104627.56	94297.49	86936.32	135835
562 STATION EXPENSES	OM562	PTRAN	84122.23	90931.03	103923.43	86043.52	116294.21	83898.29
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	87522.07	87158.79	89203.39	89187.21	86736.29	88209.66
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	229091.63	251486.95	238169.64	253067.81	259149.57	237980.88
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	28982.15	30160.95	44581.15	19944.19	35290.89	32930.62
567 RENTS	OM567	PTRAN	2058.43	2058.43	2058.43	2058.43	2058.43	2058.43
568 MAINTENACE SUPERVISION AND ENG	OM568	LBTRAN	44241.45	45590.11	51110.87	42324.47	40557.13	55824.53
569 STRUCTURES	OM569	PTRAN	80.04	577.95	1084.71	2771.42	1003.78	1896.87
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	124235.3	158259.64	153920.85	137834.03	134856.99	175088.1
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	140543.65	122631.69	245673.12	136904.15	282898.22	547382.49
572 UNDERGROUND LINES	OM572	PTRAN	0	0	0	0	0	0
573 MISC PLANT	OM573	PTRAN	4923.69	6697.42	5370.15	3919.44	6630.08	5359.76
Total Transmission Expenses			895,084.71	951,461.38	1,111,998.73	926,182.32	1,105,382.11	1,436,717.68

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Operation and Maintenance Expenses (Continued)			
Other Power Supply Expenses			
555 PURCHASED POWER Energy	OM555	OMPP	1559538.19
555 PURCHASED POWER Demand	OMD555	OMPPD	350837.07
555 PURCHASED POWER BREC Share of HMP&L Station Two	OMH555	OMPPH	5,122,362.96
555 PURCHASED POWER OPTIONS	OMO555	OMPP	0
555 BROKERAGE FEES	OMB555	OMPP	0
555 MISO TRANSMISSION EXPENSES	OMM555	OMPP	0
556 SYSTEM CONTROL AND LOAD DISPATCH	OM556	PROFIX	48189.16
557 OTHER EXPENSES	OM557	PROFIX	1599248
558 DUPLICATE CHARGES	OM558	Energy	0
Total Other Power Supply Expenses	TPP		8,680,175.38
Total Electric Power Generation Expenses			
Transmission Expenses			
560 OPERATION SUPERVISION AND ENG	OM560	LBTRAN	51278.57
561 LOAD DISPATCHING	OM561	LBTRAN	136294.18
562 STATION EXPENSES	OM562	PTRAN	102872.03
563 OVERHEAD LINE EXPENSES	OM563	PTRAN	98436.13
565 TRANSMISSION OF ELECTRICITY BY OTHERS	OM565	PTRAN	264049.42
566 MISC. TRANSMISSION EXPENSES	OM566	PTRAN	30227.33
567 RENTS	OM567	PTRAN	2058.43
568 MAINTENACE SUPERVISION AND ENG	OM568	LBTRAN	38868.14
569 STRUCTURES	OM569	PTRAN	11269.17
570 MAINT OF STATION EQUIPMENT	OM570	PTRAN	114809.26
571 MAINT OF OVERHEAD LINES	OM571	PTRAN	174260.22
572 UNDERGROUND LINES	OM572	PTRAN	0
573 MISC PLANT	OM573	PTRAN	7595.34
Total Transmission Expenses			1,032,018.22

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Distribution Operation Expense								
580 OPERATION SUPERVISION AND ENGI	OM580	LBDO	\$ -	0	0	0	0	0
581 LOAD DISPATCHING	OM581	PDIST	\$ -	0	0	0	0	0
582 STATION EXPENSES	OM582	PDIST	\$ -	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	OM583	PDIST	\$ -	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	OM584	PDIST	\$ -	0	0	0	0	0
585 STREET LIGHTING EXPENSE	OM585	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES	OM586	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	PDIST	\$ -	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	PDIST	\$ -	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	\$ -	0	0	0	0	0
588 MISC DISTR EXP - MAPPIN	OM588x	PDIST	\$ -	0	0	0	0	0
589 RENTS	OM589	PDIST	\$ -	0	0	0	0	0
Total Distribution Operation Expense	OMDO		\$ -					
Operation and Maintenance Expenses (Continued)								
Distribution Maintenance Expense								
590 MAINTENANCE SUPERVISION AND EN	OM590	LBDM	\$ -	0	0	0	0	0
591 STRUCTURES	OM591	PDIST	\$ -	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	OM592	PDIST	\$ -	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	OM593	PDIST	\$ -	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	OM594	PDIST	\$ -	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	OM595	PDIST	\$ -	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	PDIST	\$ -	0	0	0	0	0
597 MAINTENANCE OF METERS	OM597	PDIST	\$ -	0	0	0	0	0
598 MISCELLANEOUS DISTRIBUTION EXPENSES	OM598	PDIST	\$ -	0	0	0	0	0
Total Distribution Maintenance Expense	OMDM		\$ -					
Total Distribution Operation and Maintenance Expenses								
Transmission and Distribution Expenses					13,736,318			
Production, Transmission and Distribution Expenses	OMSUB		\$		416,737,971			

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Distribution Operation Expense								
580 OPERATION SUPERVISION AND ENGI	OM580	LBDO	0	0	0	0	0	0
581 LOAD DISPATCHING	OM581	PDIST	0	0	0	0	0	0
582 STATION EXPENSES	OM582	PDIST	0	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	OM583	PDIST	0	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	OM584	PDIST	0	0	0	0	0	0
585 STREET LIGHTING EXPENSE	OM585	PDIST	0	0	0	0	0	0
586 METER EXPENSES	OM586	PDIST	0	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	OM586x	PDIST	0	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	OM587	PDIST	0	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	OM588	PDIST	0	0	0	0	0	0
588 MISC DISTR EXP -- MAPPIN	OM588x	PDIST	0	0	0	0	0	0
589 RENTS	OM589	PDIST	0	0	0	0	0	0
Total Distribution Operation Expense	OMDO							
Operation and Maintenance Expenses (Continued)								
Distribution Maintenance Expense								
590 MAINTENANCE SUPERVISION AND EN	OM590	LBDM	0	0	0	0	0	0
591 STRUCTURES	OM591	PDIST	0	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	OM592	PDIST	0	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	OM593	PDIST	0	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	OM594	PDIST	0	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	OM595	PDIST	0	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM596	PDIST	0	0	0	0	0	0
597 MAINTENANCE OF METERS	OM597	PDIST	0	0	0	0	0	0
598 MISCELLANEOUS DISTRIBUTION EXPENSES	OM598	PDIST	0	0	0	0	0	0
Total Distribution Maintenance Expense	OMDM							
Total Distribution Operation and Maintenance Expenses								
Transmission and Distribution Expenses								
Production, Transmission and Distribution Expenses	OMSUB							

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Distribution Operation Expense	OM580	LBDO	0
580 OPERATION SUPERVISION AND ENGI	OM581	PDIST	0
581 LOAD DISPATCHING	OM582	PDIST	0
582 STATION EXPENSES	OM583	PDIST	0
583 OVERHEAD LINE EXPENSES	OM584	PDIST	0
584 UNDERGROUND LINE EXPENSES	OM585	PDIST	0
585 STREET LIGHTING EXPENSE	OM586	PDIST	0
586 METER EXPENSES	OM586x	PDIST	0
586 METER EXPENSES - LOAD MANAGEMENT	OM587	PDIST	0
587 CUSTOMER INSTALLATIONS EXPENSE	OM588	PDIST	0
588 MISCELLANEOUS DISTRIBUTION EXP	OM588x	PDIST	0
588 MISC DISTR EXP - MAPPIN	OM589	PDIST	0
589 RENTS			
Total Distribution Operation Expense	OMDO		
<u>Operation and Maintenance Expenses (Continued)</u>			
Distribution Maintenance Expense	OM590	LBDM	0
590 MAINTENANCE SUPERVISION AND EN	OM591	PDIST	0
591 STRUCTURES	OM592	PDIST	0
592 MAINTENANCE OF STATION EQUIPME	OM593	PDIST	0
593 MAINTENANCE OF OVERHEAD LINES	OM594	PDIST	0
594 MAINTENANCE OF UNDERGROUND LIN	OM595	PDIST	0
595 MAINTENANCE OF LINE TRANSFORME	OM596	PDIST	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	OM597	PDIST	0
597 MAINTENANCE OF METERS	OM598	PDIST	0
598 MISCELLANEOUS DISTRIBUTION EXPENSES			
Total Distribution Maintenance Expense	OMDM		
Total Distribution Operation and Maintenance Expenses			
Transmission and Distribution Expenses			
Production, Transmission and Distribution Expenses	OMSUB		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	\$ -	0	0	0	0	0
902 METER READING EXPENSES	OM902	F025	\$ -	0	0	0	0	0
903 RECORDS AND COLLECTION	OM903	F025	\$ -	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	\$ -	0	0	0	0	0
905 MISC CUST ACCOUNTS	OM903	F025	\$ -	0	0	0	0	0
Total Customer Accounts Expense	OMCA		\$ -					
Customer Service Expense								
907 SUPERVISION	OM907	TUP	\$ -	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	\$ 591,192	104389.97	75645.08	40729.07	42316.45	53316.29
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	\$ -	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	\$ -	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	\$ -	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	\$ -	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	\$ -	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	\$ -	0	0	0	0	0
913 ADVERTISING EXPENSES	OM913	TUP	\$ 488,103	103663.39	219971.2	7179.7	3679.68	21007.78
915 MDSE-JOBGING-CONTRACT	OM915	TUP	\$ -	0	0	0	0	0
916 MISC SALES EXPENSE	OM916	TUP	\$ -	0	0	0	0	0
Total Customer Service Expense	OMCS		\$ 1,079,295	208053.36	295616.28	47908.77	45996.13	74324.07
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2		\$ 417,817,266					
Operation and Maintenance Expenses (Continued)								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	\$ 14,315,713	2092449.03	1522142.97	1300504.05	1313340.25	1495631.43
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	\$ 6,915,648	432653.99	1082881.21	447533.76	790015.22	520665.52
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	\$ -	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	\$ 3,954,189	337609.86	1175322.5	167190.31	217289.45	526048.51
924 PROPERTY INSURANCE	OM924	TUP	\$ -	0	0	0	0	0
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	\$ 179,889	13413.2	21072.48	15311.2	15178.2	25828.68
926 EMPLOYEE BENEFITS	OM926	LBSUB9	\$ 169,663	4383.08	-2896.98	25050.87	3276.12	0
927 FRANCHISE REQUIREMENTS	OM927	TUP	\$ -	0	0	0	0	0
928 REGULATORY COMMISSION FEES	OM928	TUP	\$ 1,188,958	2785	925	0	0	1790.1
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	\$ -	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	\$ 1,686,131	68132.08	249532.88	81732.32	215359.96	139106.95
931 RENTS AND LEASES	OM931	PGP	\$ 1,933	161.09	161.09	161.09	161.09	161.09
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	\$ 208,156	23769.07	24452.06	14946.22	44645.76	14798.82
Total Administrative and General Expense	OMAG		\$ 28,620,280	2,975,556.40	4,073,593.21	2,052,429.82	2,599,266.05	2,724,031.10
Total Operation and Maintenance Expenses	TOM		\$ 446,437,546					
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP		\$ 224,914,919					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	0	0	0	0	0	0
902 METER READING EXPENSES	OM902	F025	0	0	0	0	0	0
903 RECORDS AND COLLECTION	OM903	F025	0	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	0	0	0	0	0	0
905 MISC CUST ACCOUNTS	OM903	F025	0	0	0	0	0	0
Total Customer Accounts Expense	OMCA							
Customer Service Expense								
907 SUPERVISION	OM907	TUP	0	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	42590.29	45548.65	47955.97	41989.91	36242.46	23856.1
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	0	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	0	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	0	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	0	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	0	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	0	0	0	0	0	0
913 ADVERTISING EXPENSES	OM913	TUP	-36141.33	11695.6	18760.65	13630.34	24487.44	100169
915 MDSE-JOBING-CONTRACT	OM915	TUP	0	0	0	0	0	0
916 MISC SALES EXPENSE	OM916	TUP	0	0	0	0	0	0
Total Customer Service Expense	OMCS		6448.96	57244.25	66716.62	55620.25	60729.9	124025.1
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2							
Operation and Maintenance Expenses (Continued)								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	1326991.23	427833.15	1263415.19	446430.74	948956.12	1178332.32
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	591943.78	481169.78	617503.76	673906.86	384307.2	494280.5
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	0	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	388800.48	188378.03	280346.99	85723.73	284467.92	205203.9
924 PROPERTY INSURANCE	OM924	TUP	0	0	0	0	0	0
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	14679.26	12401	12401	12401	12401	12401
926 EMPLOYEE BENEFITS	OM926	LBSUB9	53705.24	8851.25	5962.88	6192.45	33341.38	6109.83
927 FRANCHISE REQUIREMENTS	OM927	TUP	0	0	0	0	0	0
928 REGULATORY COMMISSION FEES	OM928	TUP	1353.14	48087.75	665466.25	48046.08	139142.52	18419
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	0	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	94167.83	259652.47	119570.46	108391.43	155943.83	63658.14
931 RENTS AND LEASES	OM931	PGP	161.09	161.09	161.09	161.09	161.09	161.09
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	8698.33	7258.14	13445.04	8125.63	22399.01	9027.98
Total Administrative and General Expense	OMAG		2,480,500.38	1,433,792.66	2,978,272.66	1,389,379.01	1,981,120.07	1,987,593.76
Total Operation and Maintenance Expenses	TOM							
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP							

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Customer Accounts Expense			
901 SUPERVISION/CUSTOMER ACCTS	OM901	F025	0
902 METER READING EXPENSES	OM902	F025	0
903 RECORDS AND COLLECTION	OM903	F025	0
904 UNCOLLECTIBLE ACCOUNTS	OM904	F025	0
905 MISC CUST ACCOUNTS	OM903	F025	0
Total Customer Accounts Expense	OMCA		
Customer Service Expense			
907 SUPERVISION	OM907	TUP	0
908 CUSTOMER ASSISTANCE EXPENSES	OM908	TUP	36611.39
908 CUSTOMER ASSISTANCE EXP-INCENTIVES	OM908x	TUP	0
909 INFORMATIONAL AND INSTRUCTIONA	OM909	TUP	0
909 INFORM AND INSTRUC -LOAD MGMT	OM909x	TUP	0
910 MISCELLANEOUS CUSTOMER SERVICE	OM910	TUP	0
911 DEMONSTRATION AND SELLING EXP	OM911	TUP	0
912 DEMONSTRATION AND SELLING EXP	OM912	TUP	0
913 ADVERTISING EXPENSES	OM913	TUP	0
915 MDSE-JOBGING-CONTRACT	OM915	TUP	0
916 MISC SALES EXPENSE	OM916	TUP	0
Total Customer Service Expense	OMCS		36611.39
Sub-Total Prod, Trans, Dist, Cust Acct and Cust Service	OMSUB2		
<u>Operation and Maintenance Expenses (Continued)</u>			
Administrative and General Expense			
920 ADMIN. & GEN. SALARIES-	OM920	LBSUB9	999686.96
921 OFFICE SUPPLIES AND EXPENSES	OM921	LBSUB9	398586.21
922 ADMINISTRATIVE EXPENSES TRANSFERRED	OM922	LBSUB9	0
923 OUTSIDE SERVICES EMPLOYED	OM923	LBSUB9	97807.2
924 PROPERTY INSURANCE	OM924	TUP	0
925 INJURIES AND DAMAGES - INSURAN	OM925	LBSUB9	12401
926 EMPLOYEE BENEFITS	OM926	LBSUB9	25686.5
927 FRANCHISE REQUIREMENTS	OM927	TUP	0
928 REGULATORY COMMISSION FEES	OM928	TUP	262942.92
929 DUPLICATE CHARGES-CR	OM929	LBSUB9	0
930 MISCELLANEOUS GENERAL EXPENSES	OM930	LBSUB9	130882.85
931 RENTS AND LEASES	OM931	PGP	161.09
935 MAINTENANCE OF GENERAL PLANT	OM935	PGP	16590.29
Total Administrative and General Expense	OMAG		1,944,745.02
Total Operation and Maintenance Expenses	TOM		
Operation and Maintenance Expenses Less Purchase Power & Fuel	OMLPP		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses								
Steam Power Generation Operation Expenses	LB500	PROFIX	\$ 4,967,667	342832.39	1034681.8	357452.74	317350.15	384316.78
500 OPERATION SUPERVISION & ENGINEERING	LB501	Energy	\$ 3,889,944	323255.71	364406.07	338654.53	313289.78	326385.9
501 FUEL	LB502	PROFIX	\$ 9,023,322	657659.63	771924.79	681077.92	630021.61	688026.67
502 STEAM EXPENSES	LB505	PROFIX	\$ 4,523,897	357040.19	416235	378976.79	348125.67	369036.85
505 ELECTRIC EXPENSES	LB506	PROFIX	\$ 940,518	52261.31	80829.64	70706.68	101840.85	81036.08
506 MISC. STEAM POWER EXPENSES	LB507	PROFIX	\$ -	0	0	0	0	0
507 RENTS	LB509	Energy	\$ -	0	0	0	0	0
509 ALLOWANCES			\$ -	0	0	0	0	0
Total Steam Power Operation Expenses	LBSUB1		\$ 23,345,348	1066961.13	1268989.43	1130761.39	1079988.13	1138099.6
Steam Power Generation Maintenance Expenses	LB510	Energy	\$ 3,623,969	301562.96	282674.01	280925.01	285686.26	324812.85
510 MAINTENANCE SUPERVISION & ENGINEERING	LB511	PROFIX	\$ 986,831	60839.92	78449.28	79549.6	75632	64969.97
511 MAINTENANCE OF STRUCTURES	LB512	Energy	\$ 8,700,235	613650.58	728746.59	804049.52	597501.69	694231.84
512 MAINTENANCE OF BOILER PLANT	LB513	Energy	\$ 1,595,642	209176.55	143092.64	90379.11	93612.16	119373.66
513 MAINTENANCE OF ELECTRIC PLANT	LB514	PROFIX	\$ 200,886	16879.23	22485.07	12128	16408.41	14092.69
514 MAINTENANCE OF MISC STEAM PLANT			\$ -	-	-	-	-	-
Total Steam Power Generation Maintenance Expense	LBSUB2		\$ 15,107,564	1202109.24	1255447.59	1267031.24	1068840.52	1217481.01
Total Steam Power Generation Expense			\$ 38,452,913	2269070.37	2524437.02	2397792.63	2148828.65	2355580.61
Labor Expenses (Continued)								
Other Power Generation Operation Expense	LB546	PROFIX	\$ -	0	0	0	0	0
546 OPERATION SUPERVISION & ENGINEERING	LB547	Energy	\$ -	0	0	0	0	0
547 FUEL	LB548	PROFIX	\$ -	0	0	0	0	0
548 GENERATION EXPENSE	LB549	PROFIX	\$ -	0	0	0	0	0
549 MISC OTHER POWER GENERATION	LB550	PROFIX	\$ -	0	0	0	0	0
550 RENTS			\$ -	-	-	-	-	-
Total Other Power Generation Expenses	LBSUB7		\$ -	0	0	0	0	0
Other Power Generation Maintenance Expense	LB551	PROFIX	\$ -	0	0	0	0	0
551 MAINTENANCE SUPERVISION & ENGINEERING	LB552	PROFIX	\$ -	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	LB553	PROFIX	\$ 89,555	682.21	4299.67	1026.96	2400.3	4848.64
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB554	PROFIX	\$ -	0	0	0	0	0
554 MAINTENANCE OF MISC OTHER POWER GEN PLT			\$ -	-	-	-	-	-
Total Other Power Generation Maintenance Expense	LBSUB8		\$ 89,555	682.21	4299.67	1026.96	2400.3	4848.64
Total Other Power Generation Expense			\$ 89,555	682.21	4299.67	1026.96	2400.3	4848.64
Total Production Expense	LPREX		\$ 38,542,468	2269752.58	2528736.69	2398819.59	2151228.95	2360429.25

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses								
Steam Power Generation Operation Expenses								
500 OPERATION SUPERVISION & ENGINEERING	LB500	PROFIX	338156.02	414149.39	371014.23	359005.08	369873.15	334189.99
501 FUEL	LB501	Energy	309863.06	297596.67	304977.88	310355.07	339148.89	336547.05
502 STEAM EXPENSES	LB502	PROFIX	640194.64	1123637.4	744724.17	661984.49	702417.45	982572.63
505 ELECTRIC EXPENSES	LB505	PROFIX	342341.75	393006.64	354302.21	368561.14	384521.42	384533.54
506 MISC. STEAM POWER EXPENSES	LB506	PROFIX	63015.48	66970.66	87852.14	88369.17	86572.5	91267.67
507 RENTS	LB507	PROFIX	0	0	0	0	0	0
509 ALLOWANCES	LB509	Energy	0	0	0	0	0	0
Total Steam Power Operation Expenses	LBSUB1		1045551.87	1583614.7	1186878.52	1118914.8	1173511.37	1458373.84
Steam Power Generation Maintenance Expenses								
510 MAINTENANCE SUPERVISION & ENGINEERING	LB510	Energy	297255.94	289425	296206.84	280281.91	307241.14	294029.27
511 MAINTENANCE OF STRUCTURES	LB511	PROFIX	50081.03	70791.44	106230.99	106856.88	116200.49	96973.59
512 MAINTENANCE OF BOILER PLANT	LB512	Energy	617716.63	961798.07	675983.16	535600.92	651081.61	924014.95
513 MAINTENANCE OF ELECTRIC PLANT	LB513	Energy	96940.39	142971.1	124922.34	132978.24	129288.01	126399.56
514 MAINTENANCE OF MISC STEAM PLANT	LB514	PROFIX	9843.3	16400.27	20426.8	23473.83	26283.4	15419.85
Total Steam Power Generation Maintenance Expense	LBSUB2		1071837.29	1481385.88	1223770.13	1079191.78	1230094.65	1456837.22
Total Steam Power Generation Expense			2117389.16	3065000.58	2410648.65	2198106.58	2403606.02	2915211.06
Labor Expenses (Continued)								
Other Power Generation Operation Expense								
546 OPERATION SUPERVISION & ENGINEERING	LB546	PROFIX	0	0	0	0	0	0
547 FUEL	LB547	Energy	0	0	0	0	0	0
548 GENERATION EXPENSE	LB548	PROFIX	0	0	0	0	0	0
549 MISC OTHER POWER GENERATION	LB549	PROFIX	0	0	0	0	0	0
550 RENTS	LB550	PROFIX	0	0	0	0	0	0
Total Other Power Generation Expenses	LBSUB7		0	0	0	0	0	0
Other Power Generation Maintenance Expense								
551 MAINTENANCE SUPERVISION & ENGINEERING	LB551	PROFIX	0	0	0	0	0	0
552 MAINTENANCE OF STRUCTURES	LB552	PROFIX	903.26	760.91	37267.71	11775.09	12921.35	10584.31
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB553	PROFIX	0	0	0	0	0	0
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	LB554	PROFIX	0	0	0	0	0	0
Total Other Power Generation Maintenance Expense	LBSUB8		903.26	760.91	37267.71	11775.09	12921.35	10584.31
Total Other Power Generation Expense			903.26	760.91	37267.71	11775.09	12921.35	10584.31
Total Production Expense	LPREX							

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Labor Expenses			
Steam Power Generation Operation Expenses			
500 OPERATION SUPERVISION & ENGINEERING	LB500	PROFIX	344645.64
501 FUEL	LB501	Energy	325463.54
502 STEAM EXPENSES	LB502	PROFIX	739080.82
505 ELECTRIC EXPENSES	LB505	PROFIX	427215.91
506 MISC. STEAM POWER EXPENSES	LB506	PROFIX	69795.43
507 RENTS	LB507	PROFIX	0
509 ALLOWANCES	LB509	Energy	0
Total Steam Power Operation Expenses	LBSUB1		1236092.16
Steam Power Generation Maintenance Expenses			
510 MAINTENANCE SUPERVISION & ENGINEERING	LB510	Energy	383868.11
511 MAINTENANCE OF STRUCTURES	LB511	PROFIX	80256.21
512 MAINTENANCE OF BOILER PLANT	LB512	Energy	895859.55
513 MAINTENANCE OF ELECTRIC PLANT	LB513	Energy	186508.29
514 MAINTENANCE OF MISC STEAM PLANT	LB514	PROFIX	7045.58
Total Steam Power Generation Maintenance Expense	LBSUB2		1553537.74
Total Steam Power Generation Expense			2642951.16
Labor Expenses (Continued)			
Other Power Generation Operation Expense			
546 OPERATION SUPERVISION & ENGINEERING	LB546	PROFIX	0
547 FUEL	LB547	Energy	0
548 GENERATION EXPENSE	LB548	PROFIX	0
549 MISC OTHER POWER GENERATION	LB549	PROFIX	0
550 RENTS	LB550	PROFIX	0
Total Other Power Generation Expenses	LBSUB7		
Other Power Generation Maintenance Expense			
551 MAINTENANCE SUPERVISION & ENGINEERING	LB551	PROFIX	
552 MAINTENANCE OF STRUCTURES	LB552	PROFIX	
553 MAINTENANCE OF GENERATING & ELEC PLANT	LB553	PROFIX	2084.81
554 MAINTENANCE OF MISC OTHER POWER GEN PLT	LB554	PROFIX	
Total Other Power Generation Maintenance Expense	LBSUB8		
Total Other Power Generation Expense			
Total Production Expense	LPREX		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses (Continued)								
Purchased Power								
555 PURCHASED POWER	LB555	OMPP	\$ -	0	0	0	0	0
555 PURCHASED POWER Demand	LB555	OMPPD	\$ -	0	0	0	0	0
555 PURCHASED POWER OPTIONS	LBO555	OMPP	\$ -	0	0	0	0	0
555 BROKERAGE FEES	LB555	OMPP	\$ -	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	\$ -	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	\$ -	0	0	0	0	0
557 OTHER EXPENSES	LB557	PROFIX	\$ -	0	0	0	0	0
558 DUPLICATE CHARGES	LB558	Energy	\$ -	0	0	0	0	0
Total Purchased Power Labor	LBPP		\$ -					
Transmission Labor Expenses								
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	\$ 835,977	155357.97	88621.66	61719.3	53192.77	69331.26
561 LOAD DISPATCHING	LB561	PTRAN	\$ 1,304,969	240520.6	133245.05	93819.32	87693.64	104400.26
562 STATION EXPENSES	LB562	PTRAN	\$ 598,382	102945.93	50883.95	33705.43	39512.69	54112.06
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	\$ 236,393	52690.64	20206.01	20032.96	18769.45	17519.18
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	\$ -	0	0	0	0	0
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	\$ 312,375	55300.19	33112.8	26544.3	26563.55	28599.72
567 RENTS	LB567	PTRAN	\$ -	0	0	0	0	0
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	\$ 644,925	120270.89	65874.61	48314.25	39737.97	53182.86
569 MAINTENACE OF STRUCTURES	LB569	PTRAN	\$ 318	36.88	59.34	0	0	59.12
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	\$ 1,433,304	240458.8	137581.27	112331.02	103977.18	112839.1
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	\$ 1,067,766	187769.72	120250.23	62124.04	70835.46	82150.36
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	\$ 46,439	6906.42	2875.43	2872.93	4248.62	4851.27
Total Transmission Labor Expenses	LBTRAN		\$ 6,480,848	1162258.04	652710.35	461463.55	444531.33	527045.19
Distribution Operation Labor Expense								
580 OPERATION SUPERVISION AND ENGI	LB580	F023	\$ -	0	0	0	0	0
581 LOAD DISPATCHING	LB581	PDIST	\$ -	0	0	0	0	0
582 STATION EXPENSES	LB582	PDIST	\$ -	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	LB583	PDIST	\$ -	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	\$ -	0	0	0	0	0
585 STREET LIGHTING EXPENSE	LB585	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES	LB586	PDIST	\$ -	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	\$ -	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	\$ -	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	\$ -	0	0	0	0	0
589 RENTS	LB589	PDIST	\$ -	0	0	0	0	0
Total Distribution Operation Labor Expense	LBDO		\$ -					

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses (Continued)								
Purchased Power								
555 PURCHASED POWER	LB555	OMPP	0	0	0	0	0	0
555 PURCHASED POWER Demand	LBD555	OMPPD	0	0	0	0	0	0
555 PURCHASED POWER OPTIONS	LBO555	OMPP	0	0	0	0	0	0
555 BROKERAGE FEES	LBB555	OMPP	0	0	0	0	0	0
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	0	0	0	0	0	0
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	0	0	0	0	0	0
557 OTHER EXPENSES	LB557	PROFIX	0	0	0	0	0	0
558 DUPLICATE CHARGES	LB558	Energy	0	0	0	0	0	0
Total Purchased Power Labor	LBPP							
Transmission Labor Expenses								
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	57113.62	58908.5	68081.43	56191.8	51380.65	68130.77
561 LOAD DISPATCHING	LB561	PTRAN	79471.75	90840.85	104792.75	86864.08	84835.7	115440.78
562 STATION EXPENSES	LB562	PTRAN	43463.43	48316.48	56470.33	35035.32	46067.52	51613.79
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	14223.62	16460.25	15132.13	14168.98	13692.1	15806.34
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	0	0	0	0	0	0
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	21343.51	20102.2	25810.07	11252.29	17357.03	25204.78
567 RENTS	LB567	PTRAN	0	0	0	0	0	0
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	43994.75	45554.09	50783.31	42264.13	40489.73	55734.99
569 MAINTENACE OF STRUCTURES	LB569	PTRAN	26.22	0	24.61	26.14	26.21	0.65
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	98690.36	92937.1	116008.73	108080.33	93852.16	126204.48
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	66143.16	68592.74	93608.24	76903.52	71073.25	95620.68
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	4378.83	3303.42	3349.41	3196.71	3607.42	3592.3
Total Transmission Labor Expenses	LBTRAN		428849.25	445015.63	534061.01	433983.3	422381.77	557349.56
Distribution Operation Labor Expense								
580 OPERATION SUPERVISION AND ENGI	LB580	F023	0	0	0	0	0	0
581 LOAD DISPATCHING	LB581	PDIST	0	0	0	0	0	0
582 STATION EXPENSES	LB582	PDIST	0	0	0	0	0	0
583 OVERHEAD LINE EXPENSES	LB583	PDIST	0	0	0	0	0	0
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	0	0	0	0	0	0
585 STREET LIGHTING EXPENSE	LB585	PDIST	0	0	0	0	0	0
586 METER EXPENSES	LB586	PDIST	0	0	0	0	0	0
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	0	0	0	0	0	0
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	0	0	0	0	0	0
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	0	0	0	0	0	0
589 RENTS	LB589	PDIST	0	0	0	0	0	0
Total Distribution Operation Labor Expense	LBDO							

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Labor Expenses (Continued)			
Purchased Power			
555 PURCHASED POWER	LB555	OMPP	0
555 PURCHASED POWER Demand	LBD555	OMPPD	0
555 PURCHASED POWER OPTIONS	LBO555	OMPP	0
555 BROKERAGE FEES	LBB555	OMPP	0
555 MISO TRANSMISSION EXPENSES	LBM555	OMPP	0
556 SYSTEM CONTROL AND LOAD DISPATCH	LB556	PROFIX	0
557 OTHER EXPENSES	LB557	PROFIX	0
558 DUPLICATE CHARGES	LB558	Energy	0
Total Purchased Power Labor	LBPP		0
Transmission Labor Expenses			
560 OPERATION SUPERVISION AND ENG	LB560	PTRAN	47946.89
561 LOAD DISPATCHING	LB561	PTRAN	83043.95
562 STATION EXPENSES	LB562	PTRAN	36255.02
563 OVERHEAD LINE EXPENSES	LB563	PTRAN	17691.07
565 TRANSMISSION OF ELECTRICITY BY OTHERS	LB565	PTRAN	
566 MISC. TRANSMISSION EXPENSES	LB566	PTRAN	21184.45
567 RENTS	LB567	PTRAN	
568 MAINTENACE SUPERVISION AND ENG	LB568	PTRAN	38723.49
569 MAINTENACE OF STRUCTURES	LB569	PTRAN	59.17
570 MAINT OF STATION EQUIPMENT	LB570	PTRAN	90343.75
571 MAINT OF OVERHEAD LINES	LB571	PTRAN	72694.7
573 MAINT OF MISC. TRANSMISSION PLANT	LB573	PTRAN	3256.6
Total Transmission Labor Expenses	LBTRAN		205077.71
Distribution Operation Labor Expense			
580 OPERATION SUPERVISION AND ENGI	LB580	F023	0
581 LOAD DISPATCHING	LB581	PDIST	0
582 STATION EXPENSES	LB582	PDIST	0
583 OVERHEAD LINE EXPENSES	LB583	PDIST	0
584 UNDERGROUND LINE EXPENSES	LB584	PDIST	0
585 STREET LIGHTING EXPENSE	LB585	PDIST	0
586 METER EXPENSES	LB586	PDIST	0
586 METER EXPENSES - LOAD MANAGEMENT	LB586x	PDIST	0
587 CUSTOMER INSTALLATIONS EXPENSE	LB587	PDIST	0
588 MISCELLANEOUS DISTRIBUTION EXP	LB588	PDIST	0
589 RENTS	LB589	PDIST	0
Total Distribution Operation Labor Expense	LBDO		0

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses (Continued)								
Distribution Maintenance Labor Expense								
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	\$ -	0	0	0	0	0
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	\$ -	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	\$ -	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	\$ -	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	\$ -	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	\$ -	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	\$ -	0	0	0	0	0
597 MAINTENANCE OF METERS	LB597	PDIST	\$ -	0	0	0	0	0
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	\$ -	0	0	0	0	0
Total Distribution Maintenance Labor Expense	LBDM		\$ -					
Total Distribution Operation and Maintenance Labor Expenses		PDIST						
Transmission and Distribution Labor Expenses				6,480,848				
Production, Transmission and Distribution Labor Expenses	LBSUB		\$ 45,023,316					
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	\$ -	0	0	0	0	0
902 METER READING EXPENSES	LB902	F025	\$ -	0	0	0	0	0
903 RECORDS AND COLLECTION	LB903	F025	\$ -	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	\$ -	0	0	0	0	0
905 MISC CUST ACCOUNTS	LB903	F025	\$ -	0	0	0	0	0
Total Customer Accounts Labor Expense	LBCA		\$ -					
Customer Service Expense								
907 SUPERVISION	LB907	TUP	\$ -	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	\$ 544,608	98543.49	44838.51	39429.59	38666.03	49827.22
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	\$ -	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	\$ -	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	\$ -	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	\$ -	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	\$ -	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	\$ -	0	0	0	0	0
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	\$ -	0	0	0	0	0
915 MDSE-JOBING-CONTRACT	LB915	TUP	\$ -	0	0	0	0	0
916 MISC SALES EXPENSE	LB916	TUP	\$ -	0	0	0	0	0
Total Customer Service Labor Expense	LBCS		\$ 544,608	98543.49	44838.51	39429.59	38666.03	49827.22
Sub-Total Labor Exp	LBSUB9			45,567,924				

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses (Continued)								
Distribution Maintenance Labor Expense								
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	0	0	0	0	0	0
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	0	0	0	0	0	0
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	0	0	0	0	0	0
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	0	0	0	0	0	0
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	0	0	0	0	0	0
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	0	0	0	0	0	0
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	0	0	0	0	0	0
597 MAINTENANCE OF METERS	LB597	PDIST	0	0	0	0	0	0
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	0	0	0	0	0	0
Total Distribution Maintenance Labor Expense	LBDM							
Total Distribution Operation and Maintenance Labor Expenses		PDIST						
Transmission and Distribution Labor Expenses								
Production, Transmission and Distribution Labor Expenses								
Customer Accounts Expense								
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	0	0	0	0	0	0
902 METER READING EXPENSES	LB902	F025	0	0	0	0	0	0
903 RECORDS AND COLLECTION	LB903	F025	0	0	0	0	0	0
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	0	0	0	0	0	0
905 MISC CUST ACCOUNTS	LB903	F025	0	0	0	0	0	0
Total Customer Accounts Labor Expense		LBCA						
Customer Service Expense								
907 SUPERVISION	LB907	TUP	0	0	0	0	0	0
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	37915.48	41556.72	44591.58	38345.68	32873.52	44118.04
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	0	0	0	0	0	0
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	0	0	0	0	0	0
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	0	0	0	0	0	0
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	0	0	0	0	0	0
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	0	0	0	0	0	0
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	0	0	0	0	0	0
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	0	0	0	0	0	0
915 MDSE-JOBING-CONTRACT	LB915	TUP	0	0	0	0	0	0
916 MISC SALES EXPENSE	LB916	TUP	0	0	0	0	0	0
Total Customer Service Labor Expense		LBCS	37915.48	41556.72	44591.58	38345.68	32873.52	44118.04
Sub-Total Labor Exp		LBSUB9						

Big Rivers Electric Corporation
 Month by Month Accounts

Description	Name	Functional Vector	October 2010
Labor Expenses (Continued)			
Distribution Maintenance Labor Expense			
590 MAINTENANCE SUPERVISION AND EN	LB590	F024	
591 MAINTENANCE OF STRUCTURES	LB591	PDIST	
592 MAINTENANCE OF STATION EQUIPME	LB592	PDIST	
593 MAINTENANCE OF OVERHEAD LINES	LB593	PDIST	
594 MAINTENANCE OF UNDERGROUND LIN	LB594	PDIST	
595 MAINTENANCE OF LINE TRANSFORME	LB595	PDIST	
596 MAINTENANCE OF ST LIGHTS & SIG SYSTEMS	LB596	PDIST	
597 MAINTENANCE OF METERS	LB597	PDIST	
598 MAINTENANCE OF MISC DISTR PLANT	LB598	PDIST	
Total Distribution Maintenance Labor Expense	LBDM		
Total Distribution Operation and Maintenance Labor Expenses		PDIST	
Transmission and Distribution Labor Expenses			
Production, Transmission and Distribution Labor Expenses	LBSUB		
Customer Accounts Expense			
901 SUPERVISION/CUSTOMER ACCTS	LB901	F025	
902 METER READING EXPENSES	LB902	F025	
903 RECORDS AND COLLECTION	LB903	F025	
904 UNCOLLECTIBLE ACCOUNTS	LB904	F025	
905 MISC CUST ACCOUNTS	LB903	F025	
Total Customer Accounts Labor Expense	LBCA		
Customer Service Expense			
907 SUPERVISION	LB907	TUP	
908 CUSTOMER ASSISTANCE EXPENSES	LB908	TUP	33902.45
908 CUSTOMER ASSISTANCE EXP-LOAD MGMT	LB908x	TUP	
909 INFORMATIONAL AND INSTRUCTIONA	LB909	TUP	
909 INFORM AND INSTRUC -LOAD MGMT	LB909x	TUP	
910 MISCELLANEOUS CUSTOMER SERVICE	LB910	TUP	
911 DEMONSTRATION AND SELLING EXP	LB911	TUP	
912 DEMONSTRATION AND SELLING EXP	LB912	TUP	
913 WATER HEATER - HEAT PUMP PROGRAM	LB913	TUP	
915 MDSE-JOBING-CONTRACT	LB915	TUP	
916 MISC SALES EXPENSE	LB916	TUP	
Total Customer Service Labor Expense	LBCS		33902.45
Sub-Total Labor Exp	LBSUB9		

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Labor Expenses (Continued)								
Administrative and General Expense	LB920	LBSUB9	\$ 14,315,714	2092449.04	1522142.8	1300504.05	1313340.25	1495631.43
920 ADMIN. & GEN. SALARIES-	LB921	LBSUB9	-	0	0	0	0	0
921 OFFICE SUPPLIES AND EXPENSES	LB922	LBSUB9	-	0	0	0	0	0
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB923	LBSUB9	-	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	LB924	TUP	27,509	2777.2	3471.48	2777.2	2777.2	13427.68
924 PROPERTY INSURANCE	LB925	LBSUB9	17,136	2711	-43974.67	0	0	0
925 INJURIES AND DAMAGES - INSURAN	LB926	LBSUB9	-	0	0	0	0	0
926 EMPLOYEE BENEFITS	LB928	TUP	-	0	0	0	0	0
928 REGULATORY COMMISSION FEES	LB929	LBSUB9	-	0	0	0	0	0
929 DUPLICATE CHARGES-CR	LB930	LBSUB9	-	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	LB931	PGP	74,927	14602.3	14130.42	6605.75	5191.93	4971.6
931 RENTS AND LEASES	LB935	PGP	-	-	-	-	-	-
935 MAINTENANCE OF GENERAL PLANT	LBAG		\$ 14,435,286					
Total Administrative and General Expense	TLB		\$ 60,003,210					
Total Operation and Maintenance Expenses	LBLPP		\$ 60,003,210					
Operation and Maintenance Expenses Less Purchase Power								
Other Expenses								
Depreciation Expenses	DEPRDP2	PPROD	\$ 28,815,395	2347440.74	2389099.7	2595994.55	2361961.48	2361968.56
Production	DEPRDP3	PTRAN	5,182,459	443546.44	533184.66	214261.5	442312.53	442305.66
Transmission	DEPRDP4	PTRAN	-	-	-	-	-	-
Transmission	DEPRDP5	PDIST	238,155	17050.71	19802.63	19799.44	19799.44	19766.55
Distribution	DEPRDP6	PGP	-	0	0	0	0	0
General & Common Plant	DEPROTH	TPIS	-	-	-	-	-	-
Other Plant	TDEPR		\$ 34,236,009	2808037.89	2942086.99	2830055.49	2824073.45	2824040.77
Total Depreciation Expense			\$ -	0	0	0	0	0
Accretion Expense	ACRTNP	F017	\$ -	0	0	0	0	0
Production	ACRTNT	PTRAN	\$ -	0	0	0	0	0
Transmission	ACRTND	PDIST	\$ -	0	0	0	0	0
Distribution	TACRTN		\$ (94,563)	\$(379,997)	87,636	\$ -	\$ -	910
Total Accretion Expense	PTAX	TUP	\$ -	0	0	0	0	0
Property Taxes & Other	OTAX	TUP	\$ (365,864)	\$(6,691)	\$(14,191)	\$(18,627)	\$(23,851)	\$(16,042)
Amortization of Investment Tax Credit	OT	TUP	\$ 47,622,710	4168487.53	4316793.16	4234968.72	3796291.74	4133482.27
Other Expenses	INTLTD	TUP	\$ 109,257	7611	15379	4539	6545	5640
Interest	DEDUCT	TUP	\$ 81,507,549	3,789,411	4,405,617	4,220,881	3,778,986	4,123,991
Other Deductions	TOE		\$ 527,945,095					
Total Other Expenses								
Total Cost of Service (O&M + Other Expenses)								

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Labor Expenses (Continued)								
Administrative and General Expense								
920 ADMIN. & GEN. SALARIES-	LB920	LBSUB9	1326991.23	427833.15	1263415.19	446430.74	948956.12	1178332.32
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB9	0	0	0	0	0	0
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB922	LBSUB9	0	0	0	0	0	0
923 OUTSIDE SERVICES EMPLOYED	LB923	LBSUB9	0	0	0	0	0	0
924 PROPERTY INSURANCE	LB924	TUP	0	0	0	0	0	0
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB9	2278.26	0	0	0	0	0
926 EMPLOYEE BENEFITS	LB926	LBSUB9	23360	5840	5840	5840	5840	5840
928 REGULATORY COMMISSION FEES	LB928	TUP	0	0	0	0	0	0
929 DUPLICATE CHARGES-CR	LB929	LBSUB9	0	0	0	0	0	0
930 MISCELLANEOUS GENERAL EXPENSES	LB930	LBSUB9	0	0	0	0	0	0
931 RENTS AND LEASES	LB931	PGP	0	0	0	0	0	0
935 MAINTENANCE OF GENERAL PLANT	LB935	PGP	5560.19	2953.32	3794.54	2464	6700.24	5197.69
Total Administrative and General Expense	LBAG							
Total Operation and Maintenance Expenses	TLB							
Operation and Maintenance Expenses Less Purchase Power	LBLPP							
Other Expenses								
Depreciation Expenses								
Production	DEPRDP2	PPROD	2361962.84	2422279.6	2384018.59	2354733.3	2368037.83	2494767.54
Transmission	DEPRDP3	PTRAN	442357.04	442363.4	442363.15	442486.5	440016.44	450445.41
Transmission	DEPRDP4	PTRAN						
Distribution	DEPRDP5	PDIST						
General & Common Plant	DEPRDP6	PGP	19733.28	21031.35	19852.73	20082.98	19987.32	21286.62
Other Plant	DEPROTH	TPIS	0	0	0	0	0	0
Total Depreciation Expense	TDEPR		2824053.16	2885674.35	2846234.47	2817302.78	2828041.59	2966499.57
Accretion Expense								
Production	ACRTNP	F017	0	0	0	0	0	0
Transmission	ACRTNT	PTRAN	0	0	0	0	0	0
Distribution	ACRTND	PDIST	0	0	0	0	0	0
Total Accretion Expense	TACRTN							
Property Taxes & Other	PTAX	TUP	\$ 65,000	\$ 2,342	\$ 65,000	\$ -	\$ (429)	\$ 65,000
Amortization of Investment Tax Credit	OTAX	TUP	0	0	0	0	0	0
Other Expenses	OT	TUP	\$ (27,557)	\$ (8,263)	\$ (42,136)	\$ (42,545)	\$ (48,997)	\$ (56,550)
Interest	INTLTD	TUP	3848131.38	3699835.35	3741933.32	3942436.65	3958146.18	3830668.47
Other Deductions	DEDUCT	TUP	-2109	4540	14599	10828	16243	12411
Total Other Expenses	TOE		\$ 3,883,465	\$ 3,698,454	\$ 3,779,396	\$ 3,910,720	\$ 3,924,964	\$ 3,851,529
Total Cost of Service (O&M + Other Expenses)								

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Labor Expenses (Continued)			
Administrative and General Expense			
920 ADMIN. & GEN. SALARIES-	LB920	LBSUB9	999687.37
921 OFFICE SUPPLIES AND EXPENSES	LB921	LBSUB9	
922 ADMIN. EXPENSES TRANSFERRED - CREDIT	LB922	LBSUB9	
923 OUTSIDE SERVICES EMPLOYED	LB923	LBSUB9	
924 PROPERTY INSURANCE	LB924	TUP	
925 INJURIES AND DAMAGES - INSURAN	LB925	LBSUB9	0
926 EMPLOYEE BENEFITS	LB926	LBSUB9	5840
928 REGULATORY COMMISSION FEES	LB928	TUP	
929 DUPLICATE CHARGES-CR	LB929	LBSUB9	
930 MISCELLANEOUS GENERAL EXPENSES	LB930	LBSUB9	
931 RENTS AND LEASES	LB931	PGP	
935 MAINTENANCE OF GENERAL PLANT	LB935	PGP	2754.81
Total Administrative and General Expense	LBAG		
Total Operation and Maintenance Expenses	TLB		
Operation and Maintenance Expenses Less Purchase Power	LBLPP		
Other Expenses			
Depreciation Expenses			
Production	DEPRDP2	PPROD	2373130.48
Transmission	DEPRDP3	PTRAN	446815.89
Transmission	DEPRDP4	PTRAN	
Distribution	DEPRDP5	PDIST	
General & Common Plant	DEPRDP6	PGP	19962.11
Other Plant	DEPROTH	TPIS	0
Total Depreciation Expense	TDEPR		2839908.48
Accretion Expense			
Production	ACRTNP	F017	0
Transmission	ACRTNT	PTRAN	0
Distribution	ACRTND	PDIST	0
Total Accretion Expense	TACRTN		
Property Taxes & Other	PTAX	TUP	\$ (25)
Amortization of Investment Tax Credit	OTAX	TUP	0
Other Expenses	OT	TUP	\$ (60,414)
Interest	INTLTD	TUP	3951535
Other Deductions	DEDUCT	TUP	13031
Total Other Expenses	TOE		\$ 3,904,127
Total Cost of Service (O&M + Other Expenses)			

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	Total System	November 2009	December 2009	January 2010	February 2010	March 2010
Revenues								
			\$ 31,526,082	2,047,421	2,967,876	3,236,562	2,630,578	2,282,284
Jackson Purchase			\$ 56,579,648	3,789,093	5,385,841	5,977,907	4,990,050	4,209,222
Kenergy			\$ 22,828,970	1,551,653	2,374,865	2,690,998	2,281,167	1,830,442
Meade			\$ 39,110,620	3,326,073	3,242,060	3,257,550	3,000,170	3,334,841
Large Industrial			\$ 150,725,511	14,123,587	13,900,845	12,327,658	10,978,277	13,026,782
Century Total			\$ 131,680,624	11,327,935	11,867,881	11,227,291	10,087,671	11,349,236
Alcan Total								
	Total Rural		\$ 110,934,700	\$ 7,388,167	\$ 10,728,582	\$ 11,905,467	\$ 9,901,794	\$ 8,321,948
	Total Industrial		\$ 39,110,620	\$ 8,666,818	\$ 11,002,766	\$ 11,926,456	\$ 10,271,387	\$ 9,374,506
	Total Smelter		\$ 282,406,135	\$ 25,451,523	\$ 25,768,725	\$ 23,554,949	\$ 21,065,948	\$ 24,376,019
	Total		\$ 432,451,455	\$ 36,165,762	\$ 39,739,368	\$ 38,717,967	\$ 33,967,912	\$ 36,032,808
Century Invoiced			\$ 149,837,373	12,898,686	13,350,197	12,412,617	10,978,277	13,026,782
Alcan Invoiced			\$ 131,911,075	10,982,583	11,672,836	11,353,440	10,087,671	11,349,236
Century Adjustments			\$ 888,139	1,224,902	550,648	(84,959)		
Alcan Adjustments			\$ (230,451)	345,352	195,044	(126,150)		
Off System Sales			\$ 76,543,801	\$ 1,839,442	\$ 4,073,308	\$ 8,147,840	\$ 9,539,433	\$ 7,986,498
Income from Leased Property Net			\$ 149,673	\$ 149,673	\$ -	\$ -	\$ -	\$ -
Other Operating Revenue & Income			\$ 13,778,745	\$ 1,230,861	\$ 1,033,968	\$ 1,152,998	\$ 1,145,023	\$ 1,070,097
OSS Variable O&M			\$ 46,035,981	\$ 1,471,622	\$ 2,691,212	\$ 4,162,194	\$ 5,284,841	\$ 5,083,040
Energy								
Jackson Purchase			694,512,540	45,926,970	65,978,630	71,338,200	59,712,514	49,429,743
Kenergy			1,255,008,258	85,135,870	120,014,010	132,891,880	114,367,690	91,992,020
Meade			499,627,006	34,444,920	51,694,410	59,035,140	51,393,370	38,028,116
Large Industrial			928,887,170	78,192,702	74,359,872	75,056,282	70,510,685	78,126,590
Century			3,949,411,321	310,167,027	331,563,740	339,238,984	318,278,276	343,763,177
Alcan			3,163,910,039	257,031,413	268,912,646	270,478,213	245,969,029	270,738,402
Total Rural			2,449,147,804	165,507,760	237,687,050	263,265,220	225,473,574	179,449,879
Total Industrial			928,887,170	78,192,702	74,359,872	75,056,282	70,510,685	78,126,590
Total Smelter			7,113,321,360	567,198,440	600,476,386	609,717,197	564,247,305	614,501,579
Total			10,491,356,334	810,898,902	912,523,308	948,038,699	860,231,564	872,078,048

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	April 2010	May 2010	June 2010	July 2010	August 2010	September 2010
Revenues								
			1,799,767	2,308,067	3,063,639	3,258,780	3,399,012	2,561,800
Jackson Purchase			3,188,379	4,134,538	5,323,163	5,636,870	5,853,842	4,573,561
Kenergy			1,214,667	1,532,681	1,963,540	2,110,692	2,169,733	1,693,499
Meade			3,161,352	3,245,699	3,234,324	3,234,990	3,373,185	3,344,243
Large Industrial			12,044,160	12,679,922	11,679,623	12,055,865	12,367,467	11,801,654
Century Total			10,471,146	11,169,007	10,543,631	10,857,129	10,839,072	10,177,927
Alcan Total								
	Total Rural		\$ 6,202,813	\$ 7,975,287	\$ 10,350,341	\$ 11,006,341	\$ 11,422,586	\$ 8,828,859
	Total Industrial		\$ 7,564,398	\$ 8,912,918	\$ 10,521,026	\$ 10,982,552	\$ 11,396,759	\$ 9,611,302
	Total Smelter		\$ 22,515,306	\$ 23,848,930	\$ 22,223,254	\$ 22,912,994	\$ 23,206,539	\$ 21,979,581
	Total		\$ 31,879,471	\$ 35,069,915	\$ 35,807,919	\$ 37,154,326	\$ 38,002,310	\$ 34,152,683
Century Invoiced			12,044,160	12,679,922	11,679,623	12,055,865	12,367,467	12,580,920
Alcan Invoiced			10,471,146	11,169,007	10,543,631	10,857,129	10,839,072	10,806,724
Century Adjustments								(779,265)
Alcan Adjustments								(628,797)
Off System Sales			\$ 5,678,794	\$ 6,341,556	\$ 7,049,362	\$ 7,908,927	\$ 8,630,309	\$ 5,166,061
Income from Leased Property Net			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Other Operating Revenue & Income			\$ 1,140,133	\$ 1,143,171	\$ 1,284,686	\$ 1,142,016	\$ 1,145,336	\$ 1,142,234
OSS Variable O&M			\$ 3,852,774	\$ 3,932,574	\$ 3,863,529	\$ 4,155,945	\$ 4,803,709	\$ 3,568,984
Energy								
Jackson Purchase			40,334,720	49,465,221	67,937,977	74,389,907	74,455,490	53,358,978
Kenergy			72,904,910	88,391,581	119,415,050	128,859,539	129,305,728	95,902,980
Meade			28,079,875	32,805,170	43,966,515	47,969,570	47,509,670	35,325,370
Large Industrial			78,086,611	79,512,076	79,858,265	78,927,327	82,005,334	79,182,043
Century			323,212,786	331,276,534	324,397,171	337,256,977	345,310,998	317,766,683
Alcan			260,668,275	268,579,997	259,859,800	268,729,560	268,160,608	257,328,832
Total Rural -			141,319,505	170,661,972	231,319,542	251,219,016	251,270,888	184,587,328
Total Industrial			78,086,611	79,512,076	79,858,265	78,927,327	82,005,334	79,182,043
Total Smelter			583,881,061	599,856,531	584,256,971	605,986,537	613,471,606	575,095,515
Total			803,287,177	850,030,579	895,434,778	936,132,880	946,747,828	838,864,886

Big Rivers Electric Corporation
Month by Month Accounts

Description	Name	Functional Vector	October 2010
Revenues			
			1,970,297
Jackson Purchase			3,517,183
Kenergy			1,415,034
Meade			3,356,132
Large Industrial			13,739,670
Century Total			11,762,698
Alcan Total			
	Total Rural		\$ 6,902,515
	Total Industrial		\$ 8,288,350
	Total Smelter		\$ 25,502,368
	Total		\$ 35,761,015
			13,762,856
Century Invoiced			11,778,599
Alcan Invoiced			(23,186)
Century Adjustments			(15,901)
Alcan Adjustments			
			4,182,271
Off System Sales			\$ -
Income from Leased Property Net			\$ 1,148,221
Other Operating Revenue & Income			\$ 3,165,556
OSS Variable O&M			
Energy			
			42,184,190
Jackson Purchase			75,827,000
Kenergy			29,374,880
Meade			75,069,383
Large Industrial			327,178,968
Century			267,453,264
Alcan			
			147,386,070
Total Rural			75,069,383
Total Industrial			594,632,232
Total Smelter			817,087,685
Total			

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST
PSC CASE NO. 2011-00036
June 22, 2011

Request STAFF-25

Refer to pages 4-5 of the Direct Testimony of Stephane Leblanc ("Leblanc Testimony"), and Mr. Fayne's exhibit HWF-1 and HWF-2. Mr. Leblanc states at page 4, lines 16-18, that due to the current relatively high market price for aluminum, "the Sebree smelter has positive margins from operations." Mr. Leblanc also states at page 5, lines 18-20, that, "during the last wave of U.S. smelter closures in 2009, most closed indefinitely because they were not in line with world average power costs.

- a. What was the average price for electricity paid by the Sebree smelter in 2009?
- b. Did the Sebree smelter have positive margins from operations in 2009 when aluminum prices were just over \$1,300 per metric tonne?
- c. Provide a schedule, similar to Exhibit HWF-1, that includes the name, owner, production and cost of electricity as of the time of closure for each of the U.S. smelters that closed in 2009.

RESPONSE

- a. The average price for electricity paid by the Sebree smelter in 2009 prior to the unwind closing was \$32.40/MWh. After the unwind closing, the average price of power for the remainder of 2009 was \$43.60/MWh.
- b. During periods in 2009 when the LME was just over \$1,300, the Sebree smelter had negative margins from operations.
- c. Mr. Leblanc's statement on page 5 of his Direct Testimony refers to four U.S. smelters that closed in 2009 (Massena East, Alcoa-IN, Ravenswood and Columbia Falls) and are based on press releases and industry publications reviewed at the time.

Witness: Henry W. Fayne
Stephane Leblanc

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR A GENERAL) CASE NO. 2011-00036
ADJUSTMENT IN RATES)

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS RESPONSE TO
COMMISSION STAFF'S INITIAL INFORMATION REQUEST
PSC CASE NO. 2011-00036
June 22, 2011

Request STAFF-26

Refer to the Leblanc Testimony at page 8, line 17-20.

- a. Describe in detail each of the governmental and other actions that resulted in the recently announced U.S. smelter restarts.
- b. Explain why Century Aluminum restarted its fifth potline without needing any governmental or other actions.
- c. What was the approximate cost to Century Aluminum to restart its fifth potline?

RESPONSE

- a. The four smelter restarts in 2009 were Ferndale, Wenatchee, Massena East and Ormet. The Bonneville Power Administration agreed to provide Ferndale and Wenatchee low-cost hydro power to preserve jobs. Similarly, the New York Power Authority approved a new contract which provides Massena East competitive-cost power primarily based on hydro generation. For Ormet, please refer to the 2010 incentive rate set forth in the Order described in Response to Staff 3b subsequent to which Ormet restarted its 5th and 6th lines in 2011.
- b. Century Aluminum restarted its fifth potline without needing any governmental or other actions for several reasons:
 - i. The Hawesville smelter has a take-or-pay obligation to purchase the power required for the fifth potline.
 - ii. Restarting the fifth potline produces economies of scale that reduces the cost of production for the other four potlines.
 - iii. The price of the LME has increased currently to levels that support the restart under the conditions described above.
- c. The cost to Century Aluminum to restart its fifth potline was approximately \$6 million through the first quarter of 2011.

Witnesses: Henry W. Fayne
Stephane Leblanc