

Goss ■ Samford PLLC



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OCT 24 2014

**PUBLIC SERVICE
COMMISSION**

October 24, 2014

VIA HAND DELIVERY

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

Re: PSC Case No. 2014-00252

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten copies of the responses of East Kentucky Power Cooperative, Inc. ("EKPC"), to the Staff's Initial Request for Information dated October 9, 2014. Also included are an original and ten copies of EKPC's responses to the First Request for Information from the Attorney General dated October 10, 2014.

Also enclosed are an original and ten copies of EKPC's Petition for Confidential Treatment of Information ("Petition") regarding the response to Request 30f. One unredacted copy of the designated confidential portions of the response to Request 30f, which is the subject of the Petition, is enclosed in a sealed envelope.

Very truly yours,

David S. Samford

Enclosures

Cc: Parties of Record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 24 2014

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

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

CASE NO.
2014-00252

MOTION FOR CONFIDENTIAL TREATMENT

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by and through counsel, pursuant to KRS 61.878, 807 KAR 5:001, Section 13 and other applicable law, and for its Motion requesting that the Kentucky Public Service Commission ("Commission") afford confidential treatment to a portion of EKPC's response to Commission Staff's Initial Request for Information in the above-captioned proceeding, respectfully states as follows:

1. EKPC's Application requests that the Commission issue a Certificate of Public Convenience and Necessity ("CPCN") for the construction of a coal ash landfill at EKPC's J. K. Smith Station ("Smith" or "Smith Station") to receive coal ash removed and transported from its William C. Dale Station ("Dale" or "Dale Station") (collectively, the "Project"), and for approval of an Environmental Compliance Plan amendment for purposes of recovering the costs of the Project through EKPC's Environmental Surcharge.

2. On October 9, 2014, Commission Staff propounded upon EKPC its Initial Request for Information. Request 30(f) of Commission Staff's Initial Request for Information pertains to Exhibit ISS-4 to the Direct Testimony of Isaac S. Scott, EKPC's Manager of Pricing.¹ Exhibit ISS-4 describes, *inter alia*, the manner in which EKPC derived the total fixed charge rate that it utilized to estimate the annual revenue requirements associated with the Project. Commission Staff's Request 30(f) seeks "the calculations and supporting documentation for the property tax, property insurance and total O&M factors used to determine the fixed charge rate."

3. Contemporaneous with the filing of this Motion, EKPC is tendering information and documentation responsive to Commission Staff's Request 30(f). Specifically, EKPC is providing, *inter alia*: (1) a series of invoices from Factory Mutual Insurance Company ("FM Global"), EKPC's property insurer; (2) an invoice from Marsh USA, Inc. ("Marsh"), EKPC's insurance broker; and (3) a narrative with calculations which reflect the amounts paid pursuant to the subject invoices. These documents contain information that describes the charges paid and credits received by EKPC related to the acquisition and placement of property insurance, including specific amounts charged and credited by FM Global and Marsh (collectively, the "Confidential Information").

4. The Confidential Information is proprietary and commercially sensitive information that is retained by EKPC on a "need-to-know" basis and that is not publicly available. If disclosed, the Confidential Information would give potential insurance providers/brokers a tremendous advantage in the course of negotiations related to the acquisition and placement of property insurance. Such entities could use the information to determine EKPC's assumptions about market conditions, competitors' pricing points and other information which would tend to give EKPC's current and prospective insurance providers/brokers a distinct

¹ The Direct Testimony of Isaac S. Scott is attached to EKPC's Application as Exhibit 11.

commercial advantage both now and in the future. These commercial advantages would very likely translate into higher costs for EKPC and, by extension, detrimentally higher rates for EKPC's Members. Thus, if the detailed cost information that comprises the Confidential Information is made public, EKPC's competitors in the broader energy market will realize a significant and unfair commercial advantage.

5. The Kentucky Open Records Act exempts the Confidential Information from public disclosure. *See* KRS 61.878(1)(c). As set forth above, disclosure of the Confidential Information would permit an unfair advantage to third parties. Moreover, the Kentucky Supreme Court has stated, "information concerning the inner workings of a corporation is 'generally accepted as confidential or proprietary.'" *Hoy v. Kentucky Industrial Revitalization Authority*, 907 S.W.2d 766, 768 (Ky. 1995). Because the Confidential Information is critical to EKPC's effective execution of business decisions and strategy related to property insurance, it satisfies both the statutory and common law standards for affording confidential treatment.

6. EKPC does not object to limited disclosure of the Confidential Information described herein, pursuant to an acceptable confidentiality and nondisclosure agreement, to intervenors with a legitimate interest in reviewing the same for the purpose of participating in this case.

7. In accordance with the provisions of 807 KAR 5:001, Section 13(2), EKPC is filing one copy of the unredacted response to Commission Staff's Request 30(f) (with the Confidential Information highlighted) separately under seal. Redacted copies of EKPC's response to Commission Staff's Request 30(f) are filed contemporaneously herewith.

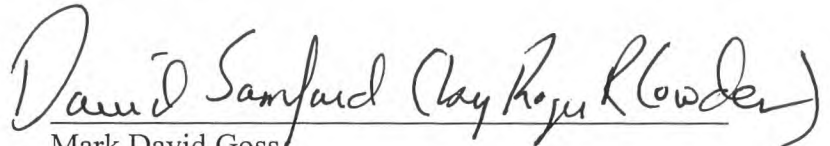
8. In accordance with the provisions of 807 KAR 5:001, Section 13(3), EKPC respectfully requests that the Confidential Information be withheld from public disclosure for a

period of ten (10) years. This will assure that the Confidential Information – if disclosed after that time – will no longer be commercially sensitive so as to likely impair the interests of EKPC if publicly disclosed.

WHEREFORE, on the basis of the foregoing, EKPC respectfully requests the Commission to enter an Order granting this Motion for Confidential Treatment and to so afford such protection from public disclosure to the Confidential Information, which is filed herewith under seal, for a period of ten (10) years from the date of entry of such an Order.

This 24th day of October, 2014.

Respectfully submitted,

A handwritten signature in black ink that reads "David Samford (by Roger R. Lowder)". The signature is written in a cursive style and is positioned above a horizontal line.

Mark David Goss
David S. Samford
M. Evan Buckley
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Counsel for East Kentucky Power Cooperative, Inc.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was deposited in the custody and care of the U.S. Mail, postage prepaid, on this the 24th day of October, 2014, addressed to the following:

Gregory T. Dutton
Assistant Attorney General
Office of the Attorney General Utility & Rate
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

David Samford (by
Roger K. Lewis)

Counsel for East Kentucky Power Cooperative, Inc.

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

IN THE MATTER OF:

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

**CASE NO.
2014-00252**

**RESPONSES TO COMMISSION STAFF'S INITIAL REQUEST FOR
INFORMATION TO EAST KENTUCKY POWER COOPERATIVE, INC.**

DATED OCTOBER 9, 2014

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

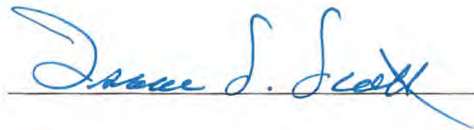
IN THE MATTER OF:
AN APPLICATION OF EAST KENTUCKY)
POWER COOPERATIVE, INC. FOR A)
CERTIFICATE OF PUBLIC CONVENIENCE)
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ASH LANDFILL AT J. K. SMITH STATION TO)
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ENVIRONMENTAL SURCHARGE RECOVERY)

CASE NO.
2014-00252

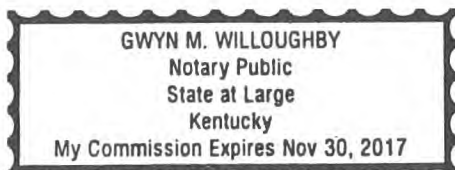
CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Isaac S. Scott, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff's Initial Request for Information in the above-referenced case dated October 9, 2014, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.



Subscribed and sworn before me on this 24th day of October 2014.




Notary Public

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

IN THE MATTER OF:
AN APPLICATION OF EAST KENTUCKY)
POWER COOPERATIVE, INC. FOR A)
CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY FOR CONSTRUCTION OF AN)
ASH LANDFILL AT J. K. SMITH STATION TO) **CASE NO.**
RECEIVE IMPOUNDED ASH FROM WILLIAM) **2014-00252**
C. DALE STATION, AND FOR APPROVAL OF A)
COMPLIANCE PLAN AMENDMENT FOR)
ENVIRONMENTAL SURCHARGE RECOVERY)

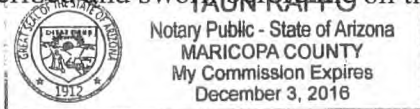
CERTIFICATE


STATE OF ARIZONA)
)
COUNTY OF MARICOPA)

Ed Tohill, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff's Initial Request for Information in the above-referenced case dated October 9, 2014, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.



Subscribed and sworn before me on this 22 day of October 2014.





Notary Public

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 1

RESPONSIBLE PARTY: Ed Tohill

Request 1. Refer to paragraph 2, at page 2 of the Application, which indicates that the Dale Station ash ponds contain 560,000 cubic yards of coal ash. Refer also to footnote 4, pages 3-4 of the Application, which indicates that Ash Pond 2 has 248,000 cubic yards of coal ash, Ash Pond 3 has 58,000 cubic yards of coal ash, and Ash Pond 4 has 67,000 cubic yards of coal ash, for a total of 373,000 cubic yards of coal ash. Do the structural fills account for the remaining coal ash of 187,000 cubic yards out of the 560,000 cubic yards referenced in paragraph 2 of the Application?

Response 1. Yes, please refer to Exhibit ET-1 page 3-1, section 3.1 for a full break down of the ash quantities.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 2

RESPONSIBLE PARTY: Matt Clark

Request 2. Refer to paragraph 7, at page 4 of the Application, regarding beneficial reuse.

Request 2a. What types of beneficial reuse projects have utilized the Dale Station coal ash?

Response 2a. The beneficial reuse projects that utilized Dale Station coal ash as structural fill were all commercial or public use projects. See response to Request for Information number 1 from the Attorney General for a full list of the projects.

Request 2b. What percentage of the 40,000-60,000 tons of ash annually produced by the Dale Station when it was in full operation was used in beneficial reuse projects?

Response 2b. All ash produced at Dale Station since 1985 was sluiced into one of the onsite Ash Ponds. When a pond became full ash was removed and would be hauled by truck and

placed at either Hancock Creek Landfill or a Beneficial Reuse Project. There was no steady annual use of the Dale ash for beneficial reuse, only the support of local projects if and when those opportunities became available.

Request 2c. Can any of the ash that will be removed from Dale be used in beneficial reuse projects?

Response 2c. Yes, however, there are no projects currently available for reuse and under the currently proposed federal Coal Combustion Residuals Rule, the future of ash for beneficial reuse as structural fill is questionable. EKPC has determined that continuing to support projects using Dale Station Coal Ash is not prudent at this time.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 3

RESPONSIBLE PARTY: Matt Clark

Request 3. Refer to paragraph 12, at page 7 of the Application.

Request 3a. Identify the outside consultants referred to in paragraph 12 of the Application and the subject area that each consultant addressed.

Response 3a. Kenvirons, Inc. was hired to provide expertise on landfill issues such as siting, design, permitting, and quality assurance. Their deliverables were a siting study for a new landfill to accept ash from Dale Station and subsequently the permit application for Smith Landfill. Redwing Ecological Services, Inc. was hired to provide expertise on water and wetland impacts. Redwing drafted EKPC's 404/401 permit application. Later, and related to the decommissioning of Dale, Burns and McDonnell was retained to evaluate the onsite options for Dale ash disposal. They also were to develop the Dale Ash Removal component of the Smith option that was previously selected in the original alternative analysis. Burns and McDonnell's deliverable on this project is Exhibit ET-1.

Request 3b. How were these consultants selected?

Response 3b. All three of these consultants were Single Sourced following EKPC policy for different reasons. Please see below for each one:

i. Kenvirons: EKPC has worked with Kenvirons extensively and successfully on landfill projects for the last 21 years. Kenvirons is a preferred landfill consultant of EKPC and selected on this project due to their experience and expertise in special waste and solid waste in Kentucky and their experience working with the Kentucky Division of Waste Management.

ii. Redwing: Redwing has prepared the last four 404/401 applications for EKPC. Their performance with the previous work has been well accepted by the permitting agencies, and they understand EKPC's permitting processes.

Redwing was the lowest evaluated bid for EKPC's last two competitive solicitations for similar work. Redwing staff has intimate knowledge of the work proposed for Smith Station, reducing the time and expense that would be required to bring other contractors up to speed on the permitting details of the facility.

iii. Burns and McDonnell: Burns and McDonnell has provided services to EKPC for a number of recent projects of environmental significance. The firm possesses an intimate knowledge of the Dale facility and specialty expertise in several areas of engineering that were crucial to an appropriate evaluation of the site and alternatives related to options for the

Dale ash, in consideration of the retirement and decommissioning of the station. Burns and McDonnell has delivered excellent work for EKPC in the recent past, and has demonstrated good value through the quality and availability of engineering resources well suited to meet EKPC's needs.

Request 3c. Provide any studies, reports, or analysis conducted by the consultants in connection with the investigation concerning the permanent disposal of the Dale Station coal ash.

Response 3c. Kenvirons Siting Study and Smith Permit Application are provided on the enclosed DVD. The Redwing 401/404 permit application is also provided on the enclosed DVD. The Burns and McDonnell report is already provided as Exhibit ET-1.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 4

RESPONSIBLE PARTY: **Matt Clark**

Request 4. Refer to paragraph 13, at page 9 of the Application, regarding Alternative 1, involving the construction a special waste landfill at the Dale Station. Did EKPC conduct a detailed analysis of this alternative? If so, provide the analysis. If not, explain why EKPC did not conduct such an analysis.

Response 4. No, such an analysis was not needed to determine that a suitable on-site location was not available or practicable while the plant is operational. There are only two undeveloped areas on site and due to slopes, offsets (required from property boundaries), size, soils, and proximity to the road and river, neither area is suitable for landfill construction, landfill permitting, or met EKPC needs for capacity. However, once the determination was made to close Dale Station, on-site alternatives were investigated since the ash ponds were no longer needed and the volume of ash for required disposal was known. This determination led to the evaluation and development of the new on-site alternatives (6 & 7).

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 5

RESPONSIBLE PARTY: **Matt Clark**

Request 5. Refer to paragraph 14, page 9 of the Application, regarding Alternative 2, involving the construction of a special waste landfill in close proximity to the Dale Station.

Request 5a. Provide the analysis conducted by EKPC and the retained engineering firm.

Response 5a. The "Special Waste Landfill Siting Evaluation", dated March 2012, prepared by Kenvirons, Inc., is provided on the enclosed DVD.

Request 5b. Identify the engineering firm retained by EKPC to assist in the analysis of Alternative 2 and explain how the engineering firm was selected by EKPC.

Response 5b. Kenvirons, Inc. was retained by EKPC to identify and evaluate potential locations considered for a future disposal site for coal combustion residuals produced by Dale Power Station anticipating continued operation. This included Alternative 2 & Alternative 8.

Kenvirons, Inc. was single-sourced for this project. EKPC has worked with Kenvirons extensively and successfully on landfill projects for the last 21 years. Kenvirons is a preferred landfill consultant of EKPC and selected on this project due to their experience and expertise in special waste and solid waste in Kentucky and their experience working with the Kentucky Division of Waste Management.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 6

RESPONSIBLE PARTY: Matt Clark

Request 6. Refer to paragraph 15, page 10 of the Application, regarding Alternatives 3, 4 and 5, involving the removal of coal ash from Dale and the various transportation methods used to deliver the ash to EKPC's the special waste landfill at EKPC's Spurlock Station or to a private landfill.

Request 6a. Provide the distance from the Dale Station to the Spurlock Station.

Response 6a. The distance from the Dale Station to the Spurlock Station is 75.3 miles.

Request 6b. Provide the distance from the Dale Station to the private landfill.

Response 6b. The distance from the Dale Station to the private landfill is 32.4 miles.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 7

RESPONSIBLE PARTY: **Matt Clark**

Request 7. Refer to the Off-Site Alternative Cost Analysis on page 11 of the Application. In the same format as found on page 22 of the Application, provide a detailed summary of the costs for Alternatives 3, 4, and 5.

Response 7. In the original evaluation of off-site alternatives in 2012, alternatives 3, 4, and 5 were based on continued operation at Dale and were eliminated in that consideration, as outlined in the alternatives analysis in the Environmental Assessment to Rural Utilities Service. The decision to close Dale Station led to the development of new Alternatives 6 & 7, developed by Burns and McDonnell to compare to the Smith Landfill Alternative that was selected from the first Alternatives Analysis in the Environmental Assessment. The two evaluations were performed by different companies and were not contemporaneous. Alternatives 3, 4, & 5 were eliminated from consideration in the original analysis and received no further examination at that time; therefore, the level of detail in the cost analysis on page 22 was never developed for these alternatives. The Off-Site Alternative Cost-Analysis on Page 11 of the Application provides an

illustration of the baseline check made by EKPC, to update Alternatives 3, 4, and 5 with cost assumptions consistent with current evaluations in order to further confirm the selection of the proposed project.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 8

RESPONSIBLE PARTY: Jerry B. Purvis

Request 8. Refer to footnote 10, at page 11 of the Application. Provide a copy of the "Environmental Assessment to USDA Rural Utilities Service dated October, 2012."

Response 8. A copy of the Environmental Assessment is provided on the enclosed DVD.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 9

RESPONSIBLE PARTY: Matt Clark

Request 9. Refer to footnote 11, at page 11 of the Application. Provide a detailed explanation of the mitigation fees referenced in this footnote and a detailed cost breakdown of the items included in such fees.

Response 9. Permitting Cost: \$46,311.38 (Charges are for lab fees for analysis used in KDWM permit, Redwing fees for 404 application, & Mist Net Survey)

Wetland & Stream Mitigation Cost: \$1,214,988.00 – See Page 18 of the 404 Application for a detailed breakdown of the Mitigation Cost, the 404 Application was provided as part of the response to Request #3.

These costs were incurred prior to the decision to retire Dale as part of the necessary steps to complete the permitting process for the Smith Special Waste Landfill. Since those costs were already sunk, they were not included in the project request authorization from the Board, although the Board was informed of the expenditure prior to their approval of the project. EKPC also erroneously omitted the \$1,261,299 from our request for cost recovery via

the Environmental Surcharge in this application. EKPC plans to immediately file a motion to supplement its Application to incorporate these fees into the ESC recovery total. In anticipation of said Supplemental filing, please see the corrected "Off-Site Alternative Cost Analysis", Page 11 of the Application, on page three of this response.

<i>Alternative</i>	<i>Dale Excavation, Site Controls, & Closure</i>	<i>Ash Loading, Hauling, & Placing</i>	<i>Rail Fees</i>	<i>Private Landfill Fee</i>	<i>Property Acquisition</i>	<i>Landfill Development</i>	<i>Lost Landfill Capacity Value</i>	<i>Smith Landfill Mitigation & Permitting Fees</i>	<i>Owner's Cost</i>	<i>Total Cost</i>
New Landfill at Smith Station	\$11,843,807	\$9,866,193	N/A	N/A	N/A	\$4,000,000	N/A	\$1,261,299	\$1,252,000	\$28,223,299
Truck CCB to Spurlock Station	\$11,843,807	\$23,260,413	N/A	N/A	N/A	N/A	\$545,175	N/A	\$1,092,000	\$36,741,395
Rail CCB to Spurlock Station	\$11,843,807	\$4,714,336	\$13,624,763	N/A	N/A	N/A	\$545,175	N/A	\$1,092,000	\$31,820,081
Truck CCB to private landfill	\$11,843,807	\$10,193,893	N/A	\$10,916,528	N/A	N/A	N/A	N/A	\$1,092,000	\$34,046,228

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 10

RESPONSIBLE PARTY: **Matt Clark**

Request 10. Refer to page 15 of the Application regarding the provision to store coal ash from the Cooper and Spurlock Stations as well as coal ash from the Dale Station.

Request 10a. Provide the number of occurrences for the period 2009-2014 that required EKPC to divert coal ash disposal to another location from the Cooper or Spurlock Stations.

Response 10a. None

Request 10b. How much disposal capacity for coal ash is left for the Cooper Station at its current special waste landfill? When does EKPC anticipate that the Cooper Station special waste landfill will reach its maximum capacity?

Response 10b. Cooper Station Landfill currently has slightly over 8 Million Cubic Yards of available permitted landfill capacity that is expected to last for approximately 30 years. Cooper Landfill is anticipated to reach capacity in 2044.

Request 10c. How much disposal capacity for coal ash is left for the Spurlock Station at its current special waste landfill? When does EKPC anticipate that the Spurlock Station special waste landfill will reach its maximum capacity?

Response 10c. Spurlock Station Landfill currently has slightly over 15.7 Million Cubic Yards of available permitted landfill capacity that is expected to last for approximately 8.7 years. Spurlock Landfill is anticipated to reach capacity in 2023.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 11

RESPONSIBLE PARTY: **Matt Clark**

Request 11. Refer to paragraph 25 and Exhibit 1 of the Application, which show the Dale Station ash ponds and illustrates the existing placement of transmission lines near those ash ponds.

Request 11a. Explain in detail the process and equipment positioning that will be utilized in removing the ash material from these ponds.

Response 11a. Final design is still ongoing, so these details are not complete and are subject to change as the prevailing site conditions and circumstances will dictate the ultimate execution of the process and equipment positioning. This construction is planned over three construction seasons: focusing first on the construction of Smith Landfill, second dewatering and removing all wet material from the ponds (this will occur second to remove all unstable material off site prior to removal of dams), third on relocation of the transmission lines, which must occur prior to removal of the dams, fourth the removal of the dams/structural fill, and fifth removal of

the heavily vegetated buffer (pond 3 dam) along the river. This planned excavation order will allow the site to retain its current protection from flooding, remove all wet unstable material prior to dam removal, keep surface water controlled between the ponds, and allow the transmission line to only be moved once. The ash will be excavated using fairly standard earth moving equipment that is ultimately positioned by the contractor to achieve stability for effectiveness and safety. The process involves positioning the equipment on “fingers” that are constructed into the pond area and moving wet ash onto piles to dewater, then loading the dryer ash into trucks. This is the method used over the life of the plant to clean out ash ponds at Dale.

Request 11b. Explain in detail the value and requirement for the proposed relocation of the four indicated electric lines and how their relocation will facilitate the ash material removal, improve the safety of the process, and enhance its loading and transportation.

Response 11b. The structures that support the transmission lines are directly embedded in the pond 2 dam & pond 3 areas. All of these areas consist predominantly of ash and will be removed as part of the project. Since all of the material supporting and surrounding the structure will be removed, it is impossible to complete this project and keep the transmission line operating without a relocation of the transmission lines.

Request 11c. Provide details of any other location(s) considered for relocating the four noted electric lines.

Response 11c. There were a total of three other areas considered however; none of those ever progressed past the initial conceptual stage due to major flaws that could not be overcome. EKPC was not able to find another option worth analyzing, and moved forward with the only option available. Please see below for the three concepts EKPC considered and rejected.

Next to Current Centerline: EKPC Transmission initially wanted to relocate the structures directly next to the exact same centerline as they currently are. The ash around the new structure location would be excavated and allow the new structure to be constructed while the line is still in service. Then once finished EKPC would take an outage and place the new line in service. This method would require removal of the area next to the river first. This is a heavily vegetated area that has provided protection for the ash from the river for over 50 years. Removing this area in 2016 and leaving the area open over the winter could put the entire fill at risk once winter storms and potential flooding occurred. EKPC plans to preserve this area and allow it to provide the same protection throughout the project and will only remove it once all other excavation is finished. Therefore, this concept will not satisfy the project plan for protection of the river bank.

Across the road: EKPC had initial internal discussion about turning the line over the project area and setting the new structures on the hillside across the road. This would allow for the transmission line to be relocated immediately and avoid any conflicts with the ash removal. However, the terrain on the hillside is extremely steep and difficult to access.

EKPC's Transmission Designers felt that construction and maintenance on the structures would be extremely difficult and costly.

Along the river: The other initial internal discussion was on relocating the line between the ash and the river. This would again allow for immediate relocation that would avoid any conflicts or coordination efforts with the ash removal. However, this would leave the lines permanently in a vulnerable position. The lines would be in the floodway and would not have protection from floodwaters or anything floating down the river during a flood. Also, the river will naturally continue to erode the river bank leaving these structures unacceptably close to the river's edge. Therefore, this option was not acceptable.

EAST KENTUCKY POWER COOPERATIVE, INC.
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RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 12

RESPONSIBLE PARTY: Matt Clark

Request 12. Refer to the estimated capital cost summary on page 22 of the Application.

Request 12a. Provide a detailed explanation and listing of the components included in the \$1,252,000 of Owner's Costs.

Response 12a. Estimated Owner's Cost for this project consists of the following components.

Owner Staff Project Management & Inspection	\$800,000
Outside Geotechnical Support for QA/QC – Dale	\$50,000
Additional Security & Safety Measures	\$150,000
Outside Geosynthetic Liner Inspection for QA/QC - Smith	\$100,000
Mitigation fees for Dale	\$127,000
Permitting Costs	\$25,000
Total	\$1,252,000

Request 12b. Provide a detailed explanation and listing of the components included in the J.K. Smith landfill construction costs of \$ 4,000,000.

Response 12b.

Mobilization: \$10,000

Site Preparation: \$85,500

Landfill Construction: \$2,777,199

Contingency: \$430,905

Pond 1A Construction: \$433,292

Pond 1A Contingency: \$64,994

Pond 2 Construction: \$172,270

Pond 2 Contingency: \$25,840

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REQUEST 13

RESPONSIBLE PARTY: Matt Clark

Request 13. Refer to Exhibit 1 of the Application, which shows a spray field. Describe the purpose and function of the spray field.

Response 13. The spray cooling field was used to cool a portion of the once-through cooling water prior to returning it to the Kentucky River to meet KPDES permit requirements. It would spray the water into the air providing enough contact time with ambient temperatures to drop the temperature before reaching the Kentucky River. We believe this technology was installed in the 1960's and ceased operation in the early 1990's.

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REQUEST 14

RESPONSIBLE PARTY: Don Mosier

Request 14. Refer to the Direct Testimony of Don Mosier ("Mosier Testimony"), page 4, regarding the closure of Dale Units 1 and 2. Provide a detailed explanation of EKPC's efforts to market the assets of Dale Units 1 and 2, including an update of such marketing efforts.

Response 14. EKPC has developed a comprehensive team comprised of staff members from across the organization to plan for the retirement of Dale Station. This team includes expertise to review investment recovery efforts. An internal marketing team is working to develop asset lists, marketing materials, and internet information to aid in the marketing effort. EKPC's recommended approach is to open the marketing effort on the high value or key interest assets to as many brokers that are available and interested in the project. The smaller or less valuable assets will either be addressed at a later time, when a decision is made about possible demolition of the power house, and/or taken to auction to maximize potential returns.

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REQUEST 15

RESPONSIBLE PARTY: **Don Mosier**

Request 15. Refer to the Mosier Testimony, page 4, regarding the future of Dale Units 3 and 4.

Request 15a. Explain in detail what is meant by the reference to "plans to condition Dale Units 3 and 4 for indefinite storage," including, but not limited to, the measures needed to place the units in indefinite storage and the associated costs of such measures.

Response 15a. Units 3 and 4 will not be marketed immediately nor will their supporting equipment, systems, or the associated critical inventory items be sold off. The turbine/generator sets and supporting equipment and systems will be minimally maintained (lubricated, turned, protected from freeze/thaw, etc.) so they could be marketed and could operate in the future, with the exception of the coal related equipment (e.g. coal chutes, pulverizers, coal fired boiler, etc.), for which maintenance is not currently planned.

Request 15b. Identify the "market, regulatory or other conditions" that would need to be changed in order to allow Dale Units 3 and 4 to operate economically again. Identify also what type of retrofit or conversion would need to take place in order to allow Dale Units 3 and 4 to operate in the future.

Response 15b. If the mass retirement of coal units across the region were to cause extreme swings in market prices or reliability, units in "indefinite storage" could be revived, with accelerated permitting or special dispensations. In order for Units 3 & 4 to burn coal after completion of this project, the construction of an ash pond would be required, the coal handling systems and boiler would need reconditioning, coal would need to be purchased, and the air permit would need to be current. Even with these considerations, Dale cannot meet MATS requirements without expensive flue gas treatments. Burning coal again at Dale is extraordinarily unlikely, after completion of this project. In order to convert the coal units to burn natural gas, the boilers would have to be modified with new burners and controls. A new natural gas transmission line of approximately 10 miles would also be needed to provide a fuel source to the plant. Again, permitting and fuel contracts would have to be acquired.

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REQUEST 16

RESPONSIBLE PARTY: Don Mosier

Request 16. Refer to the Mosier Testimony, page 8, regarding the anticipated "decommissioning" of the Dale Station.

Request 16a. Define the term "decommissioning" as used with respect to the future status of Dale Units 3 and 4.

Response 16a. Although there is no statutory definition of "decommissioning" in KRS Chapter 278, the term is intended to mean, in this context, that Dale Units 3 and 4 will be removed from service and there are no plans to ever fire them again using coal.

Request 16b. Does the "indefinite storage" of Dale Units 3 and 4 constitute "decommissioning" such that it would trigger the requirement that the Dale Station ash ponds obtain a special waste landfill permit? If so, explain why.

Response 16b. Yes. When coal is never again used as fuel at Dale, there will be no need to use the impoundments for storage of coal ash. As a consequence, the impoundments will become disposal sites that will require closure as a landfill or the ash will need to be removed for disposal in a landfill.

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REQUEST 17

RESPONSIBLE PARTY: **Jerry B. Purvis**

Request 17. Refer to the Mosier Testimony, page 10. Explain why it would be "highly improbable" that a special waste landfill permit could be obtained for the current Dale Station ash ponds and how EKPC arrived at this conclusion.

Response 17. It is highly improbable that a special waste permit could be obtained for closing the impoundments at Dale Station, because it is not possible to comply with any of the siting requirements in 401 KAR 45:130. That determination was made upon advice of counsel and discussions with the Kentucky Division of Waste Management Solid Waste Branch, which reviews applications for special waste landfills.

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REQUEST 18

RESPONSIBLE PARTY: Jerry B. Purvis

Request 18. Refer to the Direct Testimony of Jerry B. Purvis ("Purvis Testimony"), page 8, regarding the statement, "If and when the ash ponds at Dale Station cease to be used as impoundments, they will lose the permit by rule status provided by 401 KAR 45:060, Section 1(4)."

Request 18a. Explain what is meant by the phrase "cease to be used as impoundments."

Response 18a. When Dale Station is decommissioned there will no longer be a need to wet sluice ash into impoundments and there will no longer be a need to temporarily store coal ash in the impoundments pending disposal off-site. Without further action, the disposal of the ash on site will occur in the current impoundments by default, and they do not meet landfill requirements.

Request 18b. Given that Dale Units 3 and 4 would be placed in a state of “indefinite storage”, would the potential for the continued operation of those units at some point in the future affect whether the Dale Station ash ponds would be determined to have ceased to be used as impoundments as provided under 401 KAR 45:060, Section 1(4)?

Response 18b. No. See response to PSC Request 16.

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REQUEST 19

RESPONSIBLE PARTY: Jerry B. Purvis

Request 19. Refer to the Purvis Testimony, page 11, regarding the issuance of a permit to construct a special waste landfill at the Smith Station by the Kentucky Division of Waste Management on July 29, 2013.

Request 19a. Provide the date when EKPC filed an application or requested a permit to construct a special waste landfill at the Smith Station.

Response 19a. Date EKPC filed special waste landfill permit application to the Division of Waste Management – May 18, 2012

Request 19b. Explain why EKPC sought to request such a permit at that time.

Response 19b. At that time, EKPC planned for continued operation of the Dale units. The Hancock Landfill reached its capacity and could not be expanded, Ash Pond 2 reached its

capacity in 2011, and projections at that time indicated 2 - 4 years of remaining capacity in Ash Pond 4. These circumstances created the need for another ash-disposal strategy for Dale

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REQUEST 20

RESPONSIBLE PARTY: Matt Clark

Request 20. Refer to the Purvis Testimony, page 12, regarding the two options for a bottom liner at the proposed special waste landfill at the Smith Station.

Request 20a. What are the advantages and disadvantages of each of these two bottom liner options?

Response 20a. The only difference is the clay component of each composite liner system. One utilizes 24" of low permeable compacted clay where the other uses a geosynthetic clay liner (GCL). EKPC and our consultant consider these liner systems to be equal from a performance standpoint. It is a common industry standard to use GCL in place of a low permeable compacted clay liner. The advantages of GCL are as follows: faster construction, only a fourth of the amount of soil required, requires less hauling, and sometimes cheaper. The advantages to a low permeable compacted clay liner are as follows: does not require an anchor trench, can handle a much rougher subgrade, equipment can be operated on top of it, and sometimes cheaper.

Typically this choice would be made depending on the availability of low permeable clay, distance of haul, amount of rock in the clay, schedule, and condition of sub grade. Either option could be more cost effective depending on the individual site.

Request 20b. When will EKPC make a determination as to which option to use?

Response 20b. A determination typically would not be made until prior to the procurement process and dependent on whether the CCR rule is final.

Request 20c. Explain how each option would comply with the federally proposed Carbon Combustion Rule.

Response 20c. The current Coal Combustion Residuals Rule provides design requirements for the subtitle D option (a relevant excerpt from the requirements is provided on the enclosed DVD). They list a composite liner system consisting of a 60 mil geomembrane and 24" low permeable compacted clay liner. It is a very short section and does not go into the detail on whether they will accept a GCL as equivalent to the 24" of clay as the industry has been doing for many years. If the GCL is considered equivalent in the final rule, then both options meet the new CCR, however, as written only the 24" clay option meets CCR. That is why EKPC

permitted both options, either way Smith Landfill will have a liner system in the permit that meets the pending regulations.

Request 20d. Provide the cost of each type of liner and explain which cost was included in the proposed Smith landfill construction cost of \$4,000,000 on the project cost estimate on page 22 of the Application.

Response 20d. Installed GCL typically cost between \$.55 - \$.75 per SF but depends drastically on how much anchor trench is required and whether that excavation is in rock. 24" of low permeable compacted clay liner depends drastically on whether the material is on site, how long the haul is, and if it needs to be screened. Assuming it is on site and does need to be screened, the typical cost would be between \$.50 - \$.80 per SF. The cost provided in the Smith landfill construction estimate is for using the liner system with the GCL component.

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**COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 21**

RESPONSIBLE PARTY: Matt Clark

Request 21. Refer to the Purvis Testimony, page 15, regarding the closure of the Dale Station ash ponds. Confirm that the cost estimate to close the Dale Station ash ponds would be \$17,790,000, as shown on page 22 of the Application.

Response 21. The Total Estimated Project Cost is \$26,926,000 and includes Direct Cost at Dale (\$17,790,000), Indirect Cost (\$3,920,000), Owner's Cost (\$1,252,000), and J.K. Smith Special Waste Landfill Construction Cost (\$4,000,000). The Direct Cost at Dale alone will not complete the closure of the ash ponds, because it does not include the disposal of the ash in the Smith Special Waste Landfill, the management of the project, or the permitting and mitigation fees for Dale, and does not include the estimated financial impacts of escalation and contingencies.

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REQUEST 22

RESPONSIBLE PARTY: Matt Clark

Request 22. Refer to the Purvis Testimony, at page 16, lines 8 — 10.

Request 22a. What is the estimated amount in cubic yards of soil that will need to be transported from the landfill borrow areas?

Response 22a. Detailed design is still ongoing and the final yardage is still unknown. Preliminary design indicates the volume will be between 75,000 CY and 150,000 CY.

Request 22b. How many truckloads of material is this, and when would it be transported to the Dale Station?

Response 22b. The high end of the estimation (150,000 CY) assuming a 16 CY typical load would be 9375 truckloads. The preliminary plan calls for around 30,000 CY to be backhauled in 2016 with the remainder backhauled in 2017 when it is needed for the Dale site.

As stated previously, the final design is still under development and these numbers will likely change.

Request 22c. Will EKPC load the trucks returning from hauling ash from Dale Station to Smith Station with the soil in order to minimize truck traffic?

Response 22c. Yes, EKPC plans to backhaul the clay material by truck on the return trip from Smith to Dale. This will minimize both the truck traffic and cost.

Request 22d. The proposed Smith Station landfill project is estimated to be completed by the end of 2017. Does this include the grading impoundments at the Dale Station ash ponds with onsite soils and soils transported from the Smith Station?

Response 22d. Yes. This project is extremely weather dependent, however, EKPC currently plans to implement the project by the end of 2017. The final plans are still under development and unforeseen changes could affect the schedule.

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REQUEST 23

RESPONSIBLE PARTY: Matt Clark

Request 23. Refer to the Direct Testimony of Matt Clark ("Clark Testimony"), page 8, regarding the four locations near the Dale Station identified as potential sites for a special waste landfill.

Request 23a. Provide a map depicting the location of these four sites in proximity to the Dale Station.

Response 23a. The map from the Kenvirons report "Special Waste Landfill Siting Evaluation" is provided on the enclosed DVD.

Request 23b. Explain in more detail the reasons why EKPC removed sites 3 and 4 from consideration.

Response 23b. Site 3 was removed because approximately 6,000 linear feet of the haul route (county road) did not meet necessary road classification for weight and was not sufficiently

wide enough for safe hauling. The county road was also too steep for safe hauling and did not have a sufficient bridge to support truck traffic across an existing stream. In addition, an elementary school was located in very close proximity to the site and along the haul route.

Site 4 was also removed because approximately 1,100 linear feet of the haul route did not meet necessary road classification for weight and was not sufficiently wide enough for safe hauling. The same elementary school was located in very close proximity to the site and along the haul route. Sites 4 and 1 were owned by the same persons.

Request 23c. With respect to site 2, what reason did the owners of that site provide as to why they did not want to continue discussions with EKPC about selling the property?

Response 23c. The owners of Site 2 indicated they were not willing to sell during initial discussions. Site 1 was the preferred site and EKPC entered negotiations with the respective owners. (This is a correction: The preferred site was referenced in error as Site 2 in prior testimony - Matt Clark Testimony Page 8 Line 16.) After several meetings, between EKPC and the Landowners, a price was agreed and final terms were being resolved. Subsequent to this progress, the owners contacted EKPC and withdrew from negotiations, declining to sell the property or discuss further. EKPC was indirectly informed shortly thereafter that the owners had experienced negative pressure in the community related to the sale of their property for a landfill.

Request 23d. What is the status of EKPC's consideration of site 1?

Response 23d. In 2012, EKPC abandoned Site 1 in favor of a landfill constructed at the Smith site. Although Site 1 was the preferred local alternative, the only option for acquisition of the land was the exercise of Eminent Domain and the filing of a condemnation suit to seize the property in fee. Input that included persons from both the Dale and Trapp communities indicated a preference for the siting of the landfill at EKPC's Smith Station over any of the prospective sites near Dale.

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REQUEST 24

RESPONSIBLE PARTY: **Matt Clark**

Request 24. Refer to the Clark testimony and Exhibit ET-1 to the Direct Testimony of Ed Tohill, Table 6-1: Schedule Summary.

Request 24a. Page 19, lines 11-13 of the Clark Testimony, states that [c]onstruction and handling for dewatering, excavating and moving coal ash from Dale during the wet months (November and April) can be challenging, so the excavation of ash may be temporarily halted during these months." Provide in detail the challenges mentioned in this statement and explain why the project may be shut down during these months.

Response 24a. Nearly all excavation work can only be done effectively when the material is reasonably dry. When ash is wet it will not structurally support equipment, and becomes extremely hard to handle. Vibration by the equipment can further compound the problem by causing ash with a high moisture content to liquefy, creating a significant loss of structural integrity. In these circumstances, equipment mires down and is not able to operate or move, and hauling is extremely difficult because the material flows and is difficult to contain. Because

winters in Kentucky are relatively wet and cold, the daylight hours are short, and extended periods of hard freeze are uncommon, projects like this are particularly susceptible to weather challenges during those months. Such weather conditions for a project like this cause efficiency to plummet and costs to rise sharply. EKPC routinely plans projects involving significant earth work around such weather periods. Unusual weather in the fall and spring can vary the winter closure window, but the project must be planned for the normal weather expectation and adjusted as necessary.

Request 24b. Are the same considerations for coal ash referenced in Question 24.a. also applicable to construction activities related to the new landfill at Smith Station? Explain.

Response 24b. Yes, this is due to outside excavation work in this climate and applies to both the landfill and the Dale site.

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REQUEST 25

RESPONSIBLE PARTY: Matt Clark

Request 25. Refer to the Clark Testimony, page 20, indicating that the haul route has been publicly vetted.

Request 25a. Explain when and how the haul route was publically vetted.

Response 25a. In 2012 the haul route was included in the both the Kentucky Division of Waste Management permitting process and the Rural Utilities Service Environmental Assessment process for the Smith Special Waste Landfill. The KDWM process included public notice, public hearing, public meeting, and solicitation of public comments. The RUS EA process included public notice and solicitation of public comments. The public engagement activities for both processes occurred in 2012 and 2013. In 2014, EKPC has recently contacted the Kentucky Department of Highways District 7, Clark County Judge Executive, Clark County School Board Superintendent, Winchester Municipal Utilities General Manager, and Winchester Mayor, and the offices of locally elected representatives in State Government, to update them on the status of the project and the nature of the current plan. EKPC also contacted the Winchester

Sun and Lexington Herald Leader and provided preliminary information about the project, including the haul route. The articles subsequently published by both newspapers in September 2014 included a detailed description of the haul route.

Request 25b. Provide details of any other routes considered by EKPC and why they were dismissed from further consideration.

Response 25b. The only other route of reasonable length considered went through the City of Winchester. The possible route through downtown Winchester was stricken from further consideration because the City of Winchester has an ordinance prohibiting traffic on downtown streets by vehicles larger than 2 tons. There were no reasonable routes that could avoid this restriction, other than the proposed route.

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REQUEST 26

RESPONSIBLE PARTY: **Matt Clark**

Request 26. Refer to the Clark Testimony, page 22, lines 4-8, regarding the fleet of trucks required for the proposed haul plan.

Request 26a. Explain whether there is any concern for the availability of 33 trucks per day to meet the proposed haul plan of 132 loads per day.

Response 26a. Due to the length of contract and amount of hauling, EKPC does not expect truck availability to be an issue.

Request 26b. Describe the type of trucks that EKPC plans to use for transporting the ash to the Smith Station landfill, i.e., standard dump truck, semi-trailer dump truck, or covered roll-off container trucks.

Response 26b. The exact truck that will be used is not certain because final design and the procurement process are yet to come. Preliminary planning assumes a standard dump truck loaded at approximately 16 CY per truck. These truck volumes were used in the Burns and McDonnell report and are representative of the manner in which EKPC has hauled this material previously.

Request 26c. State whether EKPC will be required to obtain any special permits in order to haul the ash over the proposed route in the trucks described above.

Response 26c. No, meetings with representatives from Kentucky Department of Highways District 7 have concluded that all access points for both properties are in place and we will meet all Highway classification requirements. Therefore, no highway permitting will be necessary.

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REQUEST 27

RESPONSIBLE PARTY: **Matt Clark**

Request 27. Will the haul route go past the entrance to the new high school complex in Clark County?

Response 27. Yes.

Request 27a. If so, has this been discussed with county officials regarding the truck traffic? If it has been discussed, what was the county's reaction to the haul route? If no discussion has taken place, explain why EKPC has not reached out to the county officials concerning the truck traffic.

Response 27a. Yes. Per the response to PSC Request 25, EKPC has discussed this issue with Clark County officials. While some general concern was expressed about additional truck traffic, the county officials are familiar with the haulings EKPC has managed along this route in the past. Early discussions have occurred regarding potential safety strategies EKPC may wish to employ and, although the summer construction period will only overlap the school year by a

couple of months in the spring and in the fall, there was some discussion with the Superintendent of Schools about working together on traffic patterns specifically related to school bus traffic. The county officials were all somewhat familiar with the project, having participated in the permitting process previously. In each meeting, EKPC reiterated its commitment to managing the project and providing controls to keep the workers and the community safe.

Request 27b. Assuming there are 132 full truckloads in an eight-hour day plus the returning 132 empty trucks, confirm that would be about one truck every two minutes passing the entrance to the new high school.

Response 27b. The preliminary assumption of 132 truckloads per day was based on EKPC's previous ash hauling projects from Dale and was included as an average daily traffic figure in the initial report from Burns and McDonnell included as Exhibit ET-1. In the context of the question, 132 outbound trucks plus 132 returning trucks over an 8 hour shift would result in approximately one truck every 3 1/2 minutes in the northbound lane and one truck every 3 1/2 minutes in the southbound lane. As detailed design work is completed, the volume of truck traffic may increase or decrease during specific periods of the Project.

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REQUEST 28

RESPONSIBLE PARTY: **Matt Clark**

Request 28. Was rail transportation considered as an alternative from Dale Station to Smith Station?

Response 28. No, rail was never used in the alternatives developed as part of the RUS EA or the Burns and McDonnell report. However, rail was internally evaluated and abandoned for the following reasons. The Dale Station rail spur is only capable of handling 8 cars at a time, which would amount to approximately 800 cubic yards of ash per train. Logistically, 8 car trains cannot be loaded, delivered and unloaded frequently enough to execute the project in a reasonable time frame. The Kentucky Division of Air Quality would require additional and significant air permit modifications to two title V permits due to extra handling of the ash and the new emission points that would be located on both the Dale and Smith sites. Approval of this type of revision typically takes a couple years to acquire, which would not support the project schedule. EKPC also considers the rail transport to be environmentally less desirable than truck transport. Once the train is loaded, it is out of EKPC's control and is controlled by the railroad during the trip through the city of Winchester and out to the Smith site. Even though it is

EKPC's waste, the railroad will be in full control of how it is hauled, how long it takes, and detection of spills that may occur and require cleanup. If truck transport is used, each truck is accompanied by a driver and EKPC can more easily monitor and inspect the route to assure proper containment of the ash in the trucks. Commercial rail transport is more expensive than trucking. Initial evaluations showed that the cost of double-handling the loading of the cars, double-handling the unloading, and the fees to haul, will be higher than trucking. Additionally there would be costs to upgrade the EKPC spur that is currently unusable, and the purchase of side-dump cars to carry the ash. The obstacles to rail transportation of the ash from Dale to Smith made the option unfeasible.

Request 28a. Are there railroad spurs present at the Dale Station? If so, how far away are they from the ash ponds?

Response 28a. Yes. The end of the rail (the closest point) is approximately 650' from the center of ash pond #2.

Request 28b. Are railroad spurs present at the Smith Station? How far are they from the proposed special waste landfill?

Response 28b. Yes. The center of the landfill is approximately 700' from the railroad spur.

Request 28c. What is the cost of transporting coal ash by rail from Dale Station to Smith Station?

Response 28c. EKPC has not developed a cost model for rail transport. A rail contract may not be achievable, two dedicated engines would be required, and even then the volume limitations due to Dale's site size would likely extend the project schedule. We have contacted the appropriate rail transportation company for current cost information as part of the preparation for detailed project planning, but have not yet received enough data to complete an evaluation. We expect that the purchase of special "side-dump" cars, the capital improvements at Dale, and extra handling costs at both sites will make the rail transport alternative too costly.

Request 28d. Describe the options available to EKPC for loading coal ash into rail cars at the Dale Station, and similarly, to unload the rail cars at the Smith Station.

Response 28d. At Dale ash would be loaded into dump trucks, hauled across the site, and dumped at a location close to the spur. Then a front loader would move the ash from the pile into the cars. Other possible options could be to make capital investment in conveyance systems,

but the ash would still have to be delivered from the pond to the temporary storage location by dump truck.

For unloading at Smith, EKPC would have to use side-dump cars. After dumping the ash near the rail spur, a front loader would move the ash from the pile to a dump truck that would then haul the ash across the site and onto the landfill. EKPC would have to purchase the side-dump cars since they are not available through the railroad. Clay for the backhaul would similarly be excavated on the site and loaded into a dump truck, be transported across the site to the rail spur, then dumped and loaded into the rail cars, and the process would be reversed when the clay was delivered to the Dale site. The size of the Dale site and areas accessible from the rail spur would not be conducive to the management of both the ash and clay piles for loading/unloading.

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REQUEST 29

RESPONSIBLE PARTY: Ed Tohill

Request 29. Refer to the Direct Testimony of Ed Tohill ("Tohill Testimony").

Request 29a. On page 14 of the Tohill Testimony is a list of costs not included in the estimated costs for Alternative 8. With the exception of future O&M costs for groundwater monitoring, explain for each cost why it was not included.

Response 29a.

- Removal of the existing membrane liner at Pond 4 as it should not be impacted by the site restoration activities- since removal is not expected to be needed, no cost was included
- Additional treatment for discharging of the ash pond water- additional treatment for discharging water is an unknown at this time. We expect to be able to utilize the existing ponds and their associated discharge structures for settling, etc. and expect that we will not have to do any "additional treatment" of discharge water, so no costs were included

- Costs for environmental impacts- these costs were not included by BMcD because we considered these to be Owner's costs, and we were unsure at the time exactly what these items might include
- Costs for topographical survey- costs for a topographical survey were not included because we were not sure that one was necessary (i.e.- we expected that we could utilize the 2010 LiDAR survey for the project), although Section 3.1 in Exhibit 1 to the Tohill Testimony states that "Prior to detailed engineering, EKPC will conduct a new site survey.", these costs were assumed to be at the Owner's discretion, and if appropriate included in the Owner's Cost. An additional survey was conducted, but it was for the transmission relocation evaluation.

Request 29b. Page 16 indicates that 16 cubic yards of coal ash will be placed on each truck. Provide the equivalent weight in tons or pounds per truck.

Response 29b. Equivalent weight for 16 cubic yards of coal ash- (assuming a unit weight of 75 pounds/ft³) = 32,400 pounds or approximately 16.2 tons

Request 29c. Refer to Exhibit 1 to the Tohill Testimony. Page 3-1 states that EKPC will conduct a new site survey, the cost of which is not included in the project estimate.

(1) Explain why this cost is not included in the project estimate.

(2) Provide the estimated cost of the survey.

(3) Explain whether EKPC anticipates recovering this expense via the environmental surcharge.

Response 29c(1). See response to PSC Request 29a.

Response 29c(2). Estimated to be around \$15,000.

Response 29c(3). EKPC will not seek to recover the expense of the 2010 LiDAR Survey, but is requesting recovery via the environmental surcharge for the new survey that was required for the transmission line evaluation.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2014-00252
RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION DATED 10/09/14
REQUEST 30

RESPONSIBLE PARTY: Isaac S. Scott

Request 30. Refer to the Direct Testimony of Isaac S. Scott ("Scott Testimony").

Request 30a. Refer to page 5, lines 4-11. Provide a breakdown of the operations and maintenance expenses associated with the project, including the expenses that do not occur every year.

Response 30a. The following table shows the breakdown of the operations and maintenance expenses associated with the project.

Description	2016	2017	2018	2019	2020
Ground Water Monitoring	\$5,732	\$5,732	\$2,866	\$2,866	\$2,866
Third Party Inspections	\$6,400	\$6,400	\$6,400	\$6,400	\$6,400
Road Maintenance	\$1,500	\$1,500	\$1,500	\$1,500	\$6,500
Temporary Closure Cap Maintenance	\$1,500	\$1,500	\$1,500	\$1,500	\$1,500
Pond Maintenance	\$0	\$0	\$0	\$0	\$40,000
Mowing	\$6,000	\$6,000	\$6,000	\$6,000	\$6,000
General Engineering	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000
Total Expense per Year	\$26,132	\$26,132	\$23,266	\$23,266	\$68,266

Request 30b. Refer to page 8, lines 14-20. Explain whether EKPC will separately accumulate the costs for each of the components of the project on Form 2.1 of the monthly report.

Response 30b. EKPC had originally envisioned reporting the two components of the Project as a single entry on Form 2.1 of the monthly report and rely on EKPC account records and supporting calculations to track the two components. However, upon further review and considering the differences in the nature of the two components, EKPC wishes to revise this proposal.

EKPC now proposes that the costs associated with the construction of the landfill cell should be reported as Project 15 on Form 2.1. As the landfill cell is being constructed, the monthly balance would be reported as Construction Work in Progress (“CWIP”) under column 4 on Form 2.1 “CWIP Amount Net of AFUDC”. Upon completion of the construction, the balance in CWIP would be reclassified from CWIP to “Eligible Gross Plant in Service”, column 2 on Form 2.1. Beginning with the month when the landfill cell construction is classified as plant in service, EKPC would begin amortizing the investment and report the monthly amortization expense under column 6 of Form 2.1 and report the accumulated amortization under column 3 of Form 2.1. Attached to this response on page 10 of 35 is a revised Form 2.1 reflecting that only the landfill cell costs would be reported on this form. This revised Form 2.1 replaces Exhibit ISS-2, page 1 of 2 that was attached to the Scott Testimony.

EKPC further proposes that the costs to transfer the ash from Dale Station to the Smith Special Waste Landfill cell should be reported on a new schedule titled “Asset Retirement Obligation (ARO) Capital Expenditures and Amortization Expense” and identified as Form 2.11. This new Form 2.11 is attached to this response on page 11 of 35. As the costs for the ash transfer are incurred, the monthly balance in Account No. 108.8 – Retirement Work in Progress, would be reported under column 2 on Form 2.11 “Eligible Gross Capital Expenditure”. Upon completion of the ash transfer, the total accumulated retirement costs would be reported in column 2 and the amortization of this capital expenditure would begin. The monthly amortization expense would be reported under column 5 and the accumulated amortization under column 3 of Form 2.11.

Because EKPC is now proposing the addition of a new reporting format for the monthly surcharge report, it will be necessary to modify Form 2.0 “Revenue Requirements of Environmental Compliance Costs”. The modified Form 2.0 is attached to this response on page 12 of 35. The “Eligible Net Capital Expenditures” shown under column 4 of Form 2.11 would be included in the rate base determination as one of the listed additions on Form 2.0 and identified as “ARO Capital Expenditures, Net”. The “Monthly Amortization Expense” shown under column 5 of Form 2.11 would be included as one of the operating expenses listed on Form 2.0 and identified as “Monthly ARO Amortization Expense”.

Request 30c. Refer to page 10, lines 3-9. Provide the 2013 journal entries that recorded the Asset Retirement Obligation for the Dale Station ash ponds.

Response 30c. On December 1, 2013 EKPC made the following journal entry to record the Asset Retirement Obligation for the Dale Station ash ponds:

Debit Account No. 317001 – Asset Retirement Costs \$22,750,201.46

Credit Account No. 230003 – Asset Retirement Obligations – Ash Ponds \$22,750,201.46

Request 30d. Refer to page 10, lines 14-21.

(1) Explain why it is appropriate for EKPC to amortize the new Smith Station landfill over ten years if the "potential service life for such construction is expected to be several decades."

(2) Provide a listing of all landfills that EKPC currently has recorded on its books, including the original cost, accumulated depreciation and depreciable lives.

(3) Provide the amount of coal ash that was deposited in the Hancock Creek Inert Landfill ("Hancock Creek").

(4) Explain why it is appropriate for EKPC to amortize the new Smith Station landfill over ten years, given that Hancock Creek in which Dale coal ash was deposited was used from 1985 to 2010, a period of 25 years.

Response 30d(1). EKPC wishes to clarify that it is proposing a 10-year amortization of the \$4.0 million investment in the Special Waste Landfill cell, which is designed to hold 750,000 cubic yards of material. This landfill cell represents approximately 20 percent of the total permitted landfill capacity of 3,834,579 cubic yards at the Smith Special Waste Landfill. The amortization period only applies to the proposed landfill cell, not the entire permitted landfill at the Smith Station.

Traditionally, depreciable landfill or ash pond investments have been depreciated over the service life of the EKPC generating station where the landfill or ash pond was located. As EKPC will be closing the Dale Station, this approach was neither appropriate nor reasonable. It also is not appropriate to use the service life for the Smith Station, as the natural gas-fired combustion turbines do not produce coal ash material. The quote from the Scott Testimony that the “potential service life for such construction is expected to be several decades” was in reference to the assumption that the landfill cell will safely store and contain the coal ash for several decades and it is difficult to estimate how many decades that would be. The reference was not to how long EKPC anticipates that it would be able to deposit additional coal ash in the landfill cell.

As noted on page 11 of the Scott Testimony, as there was no specific time period on which to base the landfill cell investment recovery, it was reasonable for EKPC to consider the effect the proposed amortization period would have on the surcharge factor billed to Member Cooperatives and eventually retail customers. EKPC continues to believe a 10-year

amortization period is reasonable for a \$4.0 million landfill cell investment and reflects a reasonable balance between itself, its Member Cooperatives, and the retail customers.

Response 30d(2). EKPC currently has the following landfills and ash ponds on its books:

Account Number	Description	Original Cost	Accumulated Depreciation	Depreciable Life
Cooper Station				
310000	Steam Production – Land & Land Rights	\$571,918	\$0	
312000	Steam Production – Boiler Plant Equipment	\$873,524	\$704,334	24 years
107200	Construction Work in Progress – Force Account	\$3,366,834	\$0	
	Totals	\$4,812,276	\$704,334	
Dale Station				
310000	Steam Production – Land & Land Rights	\$64,984	\$0	
311000	Steam Production – Structures & Improvements	\$7,860	\$7,860	30
312000	Steam Production – Boiler Plant Equipment	\$333,362	\$333,362	30
	Totals	\$406,206	\$341,222	
Spurlock Station				
310000	Steam Production – Land & Land Rights	\$11,634,983	\$0	
311000	Steam Production – Structures & Improvements	\$70,680	\$58,016	34-39 years
312000	Steam Production – Boiler Plant Equipment	\$2,630,429	\$1,650,889	34-39 years
	Totals	\$14,336,092	\$1,708,905	
Notes:	Land accounts and Construction Work in Progress are not depreciated.			
	For Spurlock Station, the depreciable lives vary by generating unit: Spurlock 1 is 34 years; Spurlock 2 is 36 years; and Spurlock 3 (Gilbert) and Spurlock 4 are 39 years.			

Response 30d(3). EKPC estimates that a total amount of coal ash deposited at Hancock Creek was 567,899 cubic yards.

Response 30d(4). EKPC respectfully submits that the fact that Dale coal ash was deposited over a 25 year period at Hancock Creek has no bearing on what constitutes a reasonable amortization period for the Smith Special Waste Landfill cell and the ash transfer costs. As noted previously, EKPC traditionally depreciated landfill plant over the service life of the EKPC generating station where the landfill was located. The closure of the Dale Station effectively eliminates that approach for the landfill cell and the ash transfer costs.

EKPC anticipates transferring 560,000 cubic yards of coal ash from the Dale Station to the landfill cell over approximately three years. The proposed landfill cell has a capacity of 750,000 cubic yards. At the end of the three year period, approximately 75% of the available capacity of the landfill cell will be used up. As noted on page 15 of the Application, in the event that EKPC needs to dispose of Spurlock or Cooper coal ash in the landfill cell, the remaining 200,000 cubic yards would only approximate the total 30-day coal ash production for Spurlock. EKPC does not believe it is reasonable to require it to amortize the \$4.0 million investment in the landfill cell over 25 years when that landfill cell will be 75% utilized in approximately three years. Likewise, EKPC does not believe it is reasonable to require it to amortize the \$23.0 million in ash transfer costs over 25 years when the actual costs will be incurred over a three year period.

As stated previously, EKPC believes it is reasonable in this situation to consider the effect the proposed amortization period for both the landfill cell investment and the ash transfer costs would have on the surcharge factor billed to Member Cooperatives and

eventually retail customers. EKPC has proposed that both the landfill cell investment and the ash transfer costs should be considered capital expenditures and pursuant to KRS 278.183(1) a reasonable return on these capital expenditures is permitted. EKPC has prepared a calculation of the total amortization expense and return on the capital expenditures using 10-year and 25-year periods. The calculations are attached as pages 13 through 22 of 35 of this response. The same amount of amortization expense would be recovered under either amortization period. However, the return earned on the capital expenditures would be greater using a 25-year period versus a 10-year period. EKPC's calculations indicate it would earn an additional \$1.8 million in return on the landfill cell and an additional \$10.4 million in return on the ash transfer costs, or a total additional return of \$12.2 million. EKPC believes this return analysis supports its contention that a 10-year amortization is reasonable.

Request 30e. Provide a revised Exhibit ISS-4 using amortization periods of 15, 20 and 25 years.

Response 30e. Please see pages 23 through 27 of 35 of this response for the revisions to Exhibit ISS-4 reflecting amortization periods of 15, 20, and 25 years.

Request 30f. Refer to Exhibit ISS-4, page 1 of 2. Provide the calculations and supporting documentation for the property tax, property insurance and total O&M factors used to determine the fixed charge rate.

Response 30f. Please see pages 28 through 35 of 35 of this response for the calculations and supporting documentation for the property tax, property insurance and total O&M factors used to determine the fixed charge rate.

Revised
Form 2.1

East Kentucky Power Cooperative, Inc.
Environmental Surcharge Report
Plant, CWIP, Depreciation, & Taxes and Insurance Expenses
For the Expense Month Ending _____

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Project No.	Description	Eligible Gross Plant in Service	Eligible Accumulated Depreciation	CWIP Amount Net of AFUDC	Eligible Net Plant in Service <small>(2)-(3)=(5)</small>	Monthly Depreciation Expense	Monthly Tax Expense	Monthly Insurance Expense
1	Gilbert							
2	Spurlock 1 - Precipitator							
3	Spurlock 1 - SCR							
4	Spurlock 2 - SCR							
5	Dale 1 & 2 - Low NOx Burners							
6	Spurlock 1 - Low NOx Burners							
7	Spurlock 2 - Scrubber							
8	Spurlock 1 - Scrubber							
9	Spurlock 4							
10	Spurlock, Cooper & Dale - Continuous Monitoring Equipment							
11	Cooper 2 - Air Quality Control System							
12	Spurlock - Landfill Area C Expansion							
13	Spurlock 2 - Replace Ductwork							
14	Cooper 1 - Ductwork							
15	Smith Special Waste Landfill Cell							
	Total							

New
Form 2.11

East Kentucky Power Cooperative, Inc.
Environmental Surcharge Report
Asset Retirement Obligation (ARO) Capital Expenditures and Amortization Expense
For the Expense Month Ending _____

	(1)	(2)	(3)	(4)	(5)
Project No.	Description	Eligible Gross Capital Expenditure	Eligible Accumulated Amortization	Eligible Net Capital Expenditure	Monthly Amortization Expense
				(2) - (3) = (4)	
15	Smith Special Waste Landfill - Ash Transfer Costs	\$0	\$0	\$0	\$0
	Totals	\$0	\$0	\$0	\$0

Revised
Form 2.0

East Kentucky Power Cooperative, Inc.
Environmental Surcharge Report

Revenue Requirements of Environmental Compliance Costs
For the Expense Month Ending _____

Determination of Environmental Compliance Rate Base

Eligible Pollution Control Plant (Gross Plant)	\$0
Eligible Pollution CWIP net of AFUDC	\$0
Subtotal	\$0
<i>Additions:</i>	
Inventory - Spare Parts	\$0
Inventory - Limestone	\$0
Inventory - Emission Allowances	\$0
ARO Capital Expenditures, Net	\$0
Cash Working Capital Allowance	\$0
Subtotal	\$0
<i>Deductions</i>	
Accumulated Depreciation on Eligible Pollution Control Plant	\$0
Subtotal	\$0
Environmental Compliance Rate Base	\$0

Determination of Pollution Control Operating Expenses

Monthly O&M Expense	\$0
Monthly Depreciation and Amortization Expense	\$0
Monthly ARO Amortization Expense	\$0
Monthly Taxes Other Than Income Taxes	\$0
Monthly Insurance Expense	\$0
Monthly Emission Allowance Expense	\$0
Monthly Surcharge Consultant Fee	\$0
Total Pollution Control Operating Expense	\$0

Gross Proceeds from By-Product and Emission Allowance Sales

Total Proceeds from By-Product and Allowance Sales	\$0
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One-month True-up Adjustment

1	Authorized Recovery Amount: Current Month MESF x Avg. Monthly Wholesale Revenue for the 12-months ending with the Current Expense Month (Form 3.0)	\$0
2	Revenues Subject to Surcharge: Form 3.0, Col 6 (Current Month)	\$0
3	Environmental Surcharge Revenues Billed: Previous Month's MESF x Line 2	\$0
4	Previous Month's Authorized Recovery Amount Form 2.0, Line 1 from the Previous Month	\$0
5	Monthly (Over)/Under = Line 4 minus Line 3 To be included in Form 1.1, Line 13 in the Subsequent Month	\$0

Assumptions:	Landfill Cell construction costs	\$4,000,000
	Ash Transfer costs	\$22,962,000
	Annual Rate of Return on Rate Base	6.06%
	Monthly Rate of Return on Rate Base	0.505%

Summary of 10 Year versus 25 Year Amortization

Month	Monthly Return on Rate Base			Monthly Amortization Expense			Combined Return and Expense
	Landfill Cell	Ash Transfer	Total Monthly Return	Landfill Cell	Ash Transfer	Total Amortization Expense	
Total Return on Investment - 10 Years	\$1,272,607	\$8,468,170	\$9,740,777	\$4,000,000	\$22,962,000	\$26,962,000	\$36,702,777
Total Return on Investment - 25 Years	\$3,090,668	\$18,904,399	\$21,995,067	\$4,000,000	\$22,962,000	\$26,962,000	\$48,957,067
Difference between Amortization Periods	\$1,818,061	\$10,436,229	\$12,254,290	\$0	\$0	\$0	\$12,254,290

Assumptions:	Landfill Cell construction costs	\$4,000,000
	Ash Transfer costs	\$22,962,000
	Annual Rate of Return on Rate Base	6.06%
	Monthly Rate of Return on Rate Base	0.505%

10 Year Amortization of Investment - Return on Rate Base

Month	Landfill Cell Component			Ash Transfer Component			Total Monthly Return	Monthly Amortization Expense			Combined Return and Expense
	Investment	Accumulated Amortization	Net Investment	Investment	Accumulated Amortization	Net Investment		Landfill Cell	Ash Transfer	Total Amortization Expense	
April 2015	\$500,000		\$500,000	\$948,250		\$948,250	\$7,314				\$7,314
May	\$1,000,000		\$1,000,000	\$1,276,500		\$1,276,500	\$6,446				\$11,496
June	\$1,500,000		\$1,500,000	\$1,604,750		\$1,604,750	\$8,104				\$15,679
July	\$2,000,000		\$2,000,000	\$1,933,000		\$1,933,000	\$9,762				\$19,862
August	\$2,500,000		\$2,500,000	\$2,261,250		\$2,261,250	\$11,419				\$24,044
September	\$3,000,000		\$3,000,000	\$2,589,500		\$2,589,500	\$13,077				\$28,227
October	\$3,500,000		\$3,500,000	\$2,917,750		\$2,917,750	\$14,735				\$32,410
November	\$4,000,000	\$33,333	\$3,966,667	\$3,246,000		\$3,246,000	\$16,392	\$33,333		\$33,333	\$69,757
December 2015	\$4,000,000	\$66,666	\$3,933,334	\$3,246,000		\$3,246,000	\$16,392	\$33,333		\$33,333	\$69,588
January 2016	\$4,000,000	\$99,999	\$3,900,001	\$3,246,000		\$3,246,000	\$16,392	\$33,333		\$33,333	\$69,420
February	\$4,000,000	\$133,332	\$3,866,668	\$3,246,000		\$3,246,000	\$16,392	\$33,333		\$33,333	\$69,252
March	\$4,000,000	\$166,665	\$3,833,335	\$3,246,000		\$3,246,000	\$16,392	\$33,333		\$33,333	\$69,083
April	\$4,000,000	\$199,998	\$3,800,002	\$4,571,250		\$4,571,250	\$23,085	\$33,333		\$33,333	\$75,608
May	\$4,000,000	\$233,331	\$3,766,669	\$5,896,500		\$5,896,500	\$29,777	\$33,333		\$33,333	\$82,132
June	\$4,000,000	\$266,664	\$3,733,336	\$7,221,750		\$7,221,750	\$36,470	\$33,333		\$33,333	\$88,656
July	\$4,000,000	\$299,997	\$3,700,003	\$8,547,000		\$8,547,000	\$43,162	\$33,333		\$33,333	\$95,180
August	\$4,000,000	\$333,330	\$3,666,670	\$9,872,250		\$9,872,250	\$49,855	\$33,333		\$33,333	\$101,705
September	\$4,000,000	\$366,663	\$3,633,337	\$11,197,500		\$11,197,500	\$56,547	\$33,333		\$33,333	\$108,228
October	\$4,000,000	\$399,996	\$3,600,004	\$12,522,750		\$12,522,750	\$63,240	\$33,333		\$33,333	\$114,753
November	\$4,000,000	\$433,329	\$3,566,671	\$13,848,000		\$13,848,000	\$69,932	\$33,333		\$33,333	\$121,277
December 2016	\$4,000,000	\$466,662	\$3,533,338	\$13,848,000		\$13,848,000	\$69,932	\$33,333		\$33,333	\$121,108
January 2017	\$4,000,000	\$499,995	\$3,500,005	\$13,848,000		\$13,848,000	\$69,932	\$33,333		\$33,333	\$120,940
February	\$4,000,000	\$533,328	\$3,466,672	\$13,848,000		\$13,848,000	\$69,932	\$33,333		\$33,333	\$120,772
March	\$4,000,000	\$566,661	\$3,433,339	\$13,848,000		\$13,848,000	\$69,932	\$33,333		\$33,333	\$120,603
April	\$4,000,000	\$599,994	\$3,400,006	\$14,987,250		\$14,987,250	\$75,686	\$33,333		\$33,333	\$126,189
May	\$4,000,000	\$633,327	\$3,366,673	\$16,126,500		\$16,126,500	\$81,439	\$33,333		\$33,333	\$131,774
June	\$4,000,000	\$666,660	\$3,333,340	\$17,265,750		\$17,265,750	\$87,192	\$33,333		\$33,333	\$137,358
July	\$4,000,000	\$699,993	\$3,300,007	\$18,405,000		\$18,405,000	\$92,945	\$33,333		\$33,333	\$142,943
August	\$4,000,000	\$733,326	\$3,266,674	\$19,544,250		\$19,544,250	\$98,698	\$33,333		\$33,333	\$148,528
September	\$4,000,000	\$766,659	\$3,233,341	\$20,683,500		\$20,683,500	\$104,452	\$33,333		\$33,333	\$154,113
October	\$4,000,000	\$799,992	\$3,200,008	\$21,822,750		\$21,822,750	\$110,205	\$33,333		\$33,333	\$159,698
November	\$4,000,000	\$833,325	\$3,166,675	\$22,962,000		\$22,962,000	\$115,958	\$33,333		\$33,333	\$165,283
December 2017	\$4,000,000	\$866,658	\$3,133,342	\$22,962,000	\$191,350	\$22,770,650	\$114,992	\$33,333	\$191,350	\$224,683	\$355,498
January 2018	\$4,000,000	\$899,991	\$3,100,009	\$22,962,000	\$382,700	\$22,579,300	\$114,025	\$33,333	\$191,350	\$224,683	\$354,369
February	\$4,000,000	\$933,324	\$3,066,676	\$22,962,000	\$574,050	\$22,387,950	\$113,059	\$33,333	\$191,350	\$224,683	\$353,223
March	\$4,000,000	\$966,657	\$3,033,343	\$22,962,000	\$765,400	\$22,196,600	\$112,093	\$33,333	\$191,350	\$224,683	\$352,077
April	\$4,000,000	\$999,990	\$3,000,010	\$22,962,000	\$956,750	\$22,005,250	\$111,127	\$33,333	\$191,350	\$224,683	\$350,930
May	\$4,000,000	\$1,033,323	\$2,966,677	\$22,962,000	\$1,148,100	\$21,813,900	\$110,160	\$33,333	\$191,350	\$224,683	\$349,782
June	\$4,000,000	\$1,066,656	\$2,933,344	\$22,962,000	\$1,339,450	\$21,622,550	\$109,194	\$33,333	\$191,350	\$224,683	\$348,635
July	\$4,000,000	\$1,099,989	\$2,900,011	\$22,962,000	\$1,530,800	\$21,431,200	\$108,228	\$33,333	\$191,350	\$224,683	\$347,488
August	\$4,000,000	\$1,133,322	\$2,866,678	\$22,962,000	\$1,722,150	\$21,239,850	\$107,261	\$33,333	\$191,350	\$224,683	\$346,341
September	\$4,000,000	\$1,166,655	\$2,833,345	\$22,962,000	\$1,913,500	\$21,048,500	\$106,295	\$33,333	\$191,350	\$224,683	\$345,194
October	\$4,000,000	\$1,199,988	\$2,800,012	\$22,962,000	\$2,104,850	\$20,857,150	\$105,329	\$33,333	\$191,350	\$224,683	\$344,047
November	\$4,000,000	\$1,233,321	\$2,766,679	\$22,962,000	\$2,296,200	\$20,665,800	\$104,362	\$33,333	\$191,350	\$224,683	\$342,900
December 2018	\$4,000,000	\$1,266,654	\$2,733,346	\$22,962,000	\$2,487,550	\$20,474,450	\$103,396	\$33,333	\$191,350	\$224,683	\$341,753
January 2019	\$4,000,000	\$1,299,987	\$2,700,013	\$22,962,000	\$2,678,900	\$20,283,100	\$102,430	\$33,333	\$191,350	\$224,683	\$340,606
February	\$4,000,000	\$1,333,320	\$2,666,680	\$22,962,000	\$2,870,250	\$20,091,750	\$101,463	\$33,333	\$191,350	\$224,683	\$339,459
March	\$4,000,000	\$1,366,653	\$2,633,347	\$22,962,000	\$3,061,600	\$19,900,400	\$100,497	\$33,333	\$191,350	\$224,683	\$338,312
April	\$4,000,000	\$1,399,986	\$2,600,014	\$22,962,000	\$3,252,950	\$19,709,050	\$99,531	\$33,333	\$191,350	\$224,683	\$337,165
May	\$4,000,000	\$1,433,319	\$2,566,681	\$22,962,000	\$3,444,300	\$19,517,700	\$98,564	\$33,333	\$191,350	\$224,683	\$336,018
June	\$4,000,000	\$1,466,652	\$2,533,348	\$22,962,000	\$3,635,650	\$19,326,350	\$97,598	\$33,333	\$191,350	\$224,683	\$334,871
July	\$4,000,000	\$1,499,985	\$2,500,015	\$22,962,000	\$3,827,000	\$19,135,000	\$96,632	\$33,333	\$191,350	\$224,683	\$333,724
August	\$4,000,000	\$1,533,318	\$2,466,682	\$22,962,000	\$4,018,350	\$18,943,650	\$95,665	\$33,333	\$191,350	\$224,683	\$332,577
September	\$4,000,000	\$1,566,651	\$2,433,349	\$22,962,000	\$4,209,700	\$18,752,300	\$94,699	\$33,333	\$191,350	\$224,683	\$331,430
October	\$4,000,000	\$1,599,984	\$2,400,016	\$22,962,000	\$4,401,050	\$18,560,950	\$93,733	\$33,333	\$191,350	\$224,683	\$330,283
November	\$4,000,000	\$1,633,317	\$2,366,683	\$22,962,000	\$4,592,400	\$18,369,600	\$92,766	\$33,333	\$191,350	\$224,683	\$329,136
December 2019	\$4,000,000	\$1,666,650	\$2,333,350	\$22,962,000	\$4,783,750	\$18,178,250	\$91,800	\$33,333	\$191,350	\$224,683	\$327,989
January 2020	\$4,000,000	\$1,699,983	\$2,300,017	\$22,962,000	\$4,975,100	\$17,986,900	\$90,834	\$33,333	\$191,350	\$224,683	\$326,842
February	\$4,000,000	\$1,733,316	\$2,266,684	\$22,962,000	\$5,166,450	\$17,795,550	\$89,868	\$33,333	\$191,350	\$224,683	\$325,695
March	\$4,000,000	\$1,766,649	\$2,233,351	\$22,962,000	\$5,357,800	\$17,604,200	\$88,902	\$33,333	\$191,350	\$224,683	\$324,548
April	\$4,000,000	\$1,799,982	\$2,200,018	\$22,962,000	\$5,549,150	\$17,412,850	\$87,935	\$33,333	\$191,350	\$224,683	\$323,401
May	\$4,000,000	\$1,833,315	\$2,166,685	\$22,962,000	\$5,740,500	\$17,221,500	\$86,969	\$33,333	\$191,350	\$224,683	\$322,254
June	\$4,000,000	\$1,866,648	\$2,133,352	\$22,962,000	\$5,931,850	\$17,030,150	\$86,002	\$33,333	\$191,350	\$224,683	\$321,107
July	\$4,000,000	\$1,899,981	\$2,100,019	\$22,962,000	\$6,123,200	\$16,838,800	\$85,036	\$33,333	\$191,350	\$224,683	\$320,000

Assumptions:	Landfill Cell construction costs	\$4,000,000
	Ash Transfer costs	\$22,962,000
	Annual Rate of Return on Rate Base	6.06%
	Monthly Rate of Return on Rate Base	0.505%

10 Year Amortization of Investment - Return on Rate Base

Month	Landfill Cell Component				Ash Transfer Component				Total Monthly Return	Monthly Amortization Expense			Combined Return and Expense
	Investment	Accumulated Amortization	Net Investment	Monthly Return on Rate Base	Investment	Accumulated Amortization	Net Investment	Monthly Return on Rate Base		Landfill Cell	Ash Transfer	Total Amortization Expense	
August	\$4,000,000	\$1,933,314	\$2,066,686	\$10,437	\$22,962,000	\$6,314,550	\$16,647,450	\$84,070	\$94,507	\$33,333	\$191,350	\$224,683	\$319,190
September	\$4,000,000	\$1,966,647	\$2,033,353	\$10,268	\$22,962,000	\$6,505,900	\$16,456,100	\$83,103	\$93,371	\$33,333	\$191,350	\$224,683	\$318,054
October	\$4,000,000	\$1,999,980	\$2,000,020	\$10,100	\$22,962,000	\$6,697,250	\$16,264,750	\$82,137	\$92,237	\$33,333	\$191,350	\$224,683	\$316,920
November	\$4,000,000	\$2,033,313	\$1,966,687	\$9,932	\$22,962,000	\$6,888,600	\$16,073,400	\$81,171	\$91,103	\$33,333	\$191,350	\$224,683	\$315,786
December 2020	\$4,000,000	\$2,066,646	\$1,933,354	\$9,763	\$22,962,000	\$7,079,950	\$15,882,050	\$80,204	\$89,967	\$33,333	\$191,350	\$224,683	\$314,650
January 2021	\$4,000,000	\$2,099,979	\$1,900,021	\$9,595	\$22,962,000	\$7,271,300	\$15,690,700	\$79,238	\$88,833	\$33,333	\$191,350	\$224,683	\$313,516
February	\$4,000,000	\$2,133,312	\$1,866,688	\$9,427	\$22,962,000	\$7,462,650	\$15,499,350	\$78,272	\$87,699	\$33,333	\$191,350	\$224,683	\$312,382
March	\$4,000,000	\$2,166,645	\$1,833,355	\$9,258	\$22,962,000	\$7,654,000	\$15,308,000	\$77,305	\$86,563	\$33,333	\$191,350	\$224,683	\$311,246
April	\$4,000,000	\$2,199,978	\$1,800,022	\$9,090	\$22,962,000	\$7,845,350	\$15,116,650	\$76,339	\$85,429	\$33,333	\$191,350	\$224,683	\$310,112
May	\$4,000,000	\$2,233,311	\$1,766,689	\$8,922	\$22,962,000	\$8,036,700	\$14,925,300	\$75,373	\$84,295	\$33,333	\$191,350	\$224,683	\$308,978
June	\$4,000,000	\$2,266,644	\$1,733,356	\$8,753	\$22,962,000	\$8,228,050	\$14,733,950	\$74,406	\$83,159	\$33,333	\$191,350	\$224,683	\$307,842
July	\$4,000,000	\$2,299,977	\$1,700,023	\$8,585	\$22,962,000	\$8,419,400	\$14,542,600	\$73,440	\$82,025	\$33,333	\$191,350	\$224,683	\$306,708
August	\$4,000,000	\$2,333,310	\$1,666,690	\$8,417	\$22,962,000	\$8,610,750	\$14,351,250	\$72,474	\$80,891	\$33,333	\$191,350	\$224,683	\$305,574
September	\$4,000,000	\$2,366,643	\$1,633,357	\$8,248	\$22,962,000	\$8,802,100	\$14,159,900	\$71,507	\$79,755	\$33,333	\$191,350	\$224,683	\$304,438
October	\$4,000,000	\$2,399,976	\$1,600,024	\$8,080	\$22,962,000	\$8,993,450	\$13,968,550	\$70,541	\$78,621	\$33,333	\$191,350	\$224,683	\$303,304
November	\$4,000,000	\$2,433,309	\$1,566,691	\$7,912	\$22,962,000	\$9,184,800	\$13,777,200	\$69,575	\$77,487	\$33,333	\$191,350	\$224,683	\$302,170
December 2021	\$4,000,000	\$2,466,642	\$1,533,358	\$7,743	\$22,962,000	\$9,376,150	\$13,585,850	\$68,609	\$76,352	\$33,333	\$191,350	\$224,683	\$301,035
January 2022	\$4,000,000	\$2,499,975	\$1,500,025	\$7,575	\$22,962,000	\$9,567,500	\$13,394,500	\$67,642	\$75,217	\$33,333	\$191,350	\$224,683	\$299,900
February	\$4,000,000	\$2,533,308	\$1,466,692	\$7,407	\$22,962,000	\$9,758,850	\$13,203,150	\$66,676	\$74,083	\$33,333	\$191,350	\$224,683	\$298,766
March	\$4,000,000	\$2,566,641	\$1,433,359	\$7,238	\$22,962,000	\$9,950,200	\$13,011,800	\$65,710	\$72,948	\$33,333	\$191,350	\$224,683	\$297,631
April	\$4,000,000	\$2,599,974	\$1,400,026	\$7,070	\$22,962,000	\$10,141,550	\$12,820,450	\$64,743	\$71,813	\$33,333	\$191,350	\$224,683	\$296,496
May	\$4,000,000	\$2,633,307	\$1,366,693	\$6,902	\$22,962,000	\$10,332,900	\$12,629,100	\$63,777	\$70,679	\$33,333	\$191,350	\$224,683	\$295,362
June	\$4,000,000	\$2,666,640	\$1,333,360	\$6,733	\$22,962,000	\$10,524,250	\$12,437,750	\$62,811	\$69,544	\$33,333	\$191,350	\$224,683	\$294,227
July	\$4,000,000	\$2,699,973	\$1,300,027	\$6,565	\$22,962,000	\$10,715,600	\$12,246,400	\$61,844	\$68,409	\$33,333	\$191,350	\$224,683	\$293,092
August	\$4,000,000	\$2,733,306	\$1,266,694	\$6,397	\$22,962,000	\$10,906,950	\$12,055,050	\$60,878	\$67,275	\$33,333	\$191,350	\$224,683	\$291,958
September	\$4,000,000	\$2,766,639	\$1,233,361	\$6,228	\$22,962,000	\$11,098,300	\$11,863,700	\$59,912	\$66,140	\$33,333	\$191,350	\$224,683	\$290,823
October	\$4,000,000	\$2,799,972	\$1,200,028	\$6,060	\$22,962,000	\$11,289,650	\$11,672,350	\$58,945	\$65,005	\$33,333	\$191,350	\$224,683	\$289,688
November	\$4,000,000	\$2,833,305	\$1,166,695	\$5,892	\$22,962,000	\$11,481,000	\$11,481,000	\$57,979	\$63,871	\$33,333	\$191,350	\$224,683	\$288,554
December 2022	\$4,000,000	\$2,866,638	\$1,133,362	\$5,723	\$22,962,000	\$11,672,350	\$11,289,650	\$57,013	\$62,736	\$33,333	\$191,350	\$224,683	\$287,419
January 2023	\$4,000,000	\$2,899,971	\$1,100,029	\$5,555	\$22,962,000	\$11,863,700	\$11,098,300	\$56,046	\$61,601	\$33,333	\$191,350	\$224,683	\$286,284
February	\$4,000,000	\$2,933,304	\$1,066,696	\$5,387	\$22,962,000	\$12,055,050	\$10,906,950	\$55,080	\$60,467	\$33,333	\$191,350	\$224,683	\$285,150
March	\$4,000,000	\$2,966,637	\$1,033,363	\$5,218	\$22,962,000	\$12,246,400	\$10,715,600	\$54,114	\$59,332	\$33,333	\$191,350	\$224,683	\$284,015
April	\$4,000,000	\$2,999,970	\$1,000,030	\$5,050	\$22,962,000	\$12,437,750	\$10,524,250	\$53,147	\$58,197	\$33,333	\$191,350	\$224,683	\$282,880
May	\$4,000,000	\$3,033,303	\$966,697	\$4,882	\$22,962,000	\$12,629,100	\$10,332,900	\$52,181	\$57,063	\$33,333	\$191,350	\$224,683	\$281,746
June	\$4,000,000	\$3,066,636	\$933,364	\$4,713	\$22,962,000	\$12,820,450	\$10,141,550	\$51,215	\$55,928	\$33,333	\$191,350	\$224,683	\$280,611
July	\$4,000,000	\$3,099,969	\$900,031	\$4,545	\$22,962,000	\$13,011,800	\$9,950,200	\$50,249	\$54,794	\$33,333	\$191,350	\$224,683	\$279,477
August	\$4,000,000	\$3,133,302	\$866,698	\$4,377	\$22,962,000	\$13,203,150	\$9,758,850	\$49,282	\$53,659	\$33,333	\$191,350	\$224,683	\$278,342
September	\$4,000,000	\$3,166,635	\$833,365	\$4,208	\$22,962,000	\$13,394,500	\$9,567,500	\$48,316	\$52,524	\$33,333	\$191,350	\$224,683	\$277,207
October	\$4,000,000	\$3,199,968	\$800,032	\$4,040	\$22,962,000	\$13,585,850	\$9,376,150	\$47,350	\$51,390	\$33,333	\$191,350	\$224,683	\$276,073
November	\$4,000,000	\$3,233,301	\$766,699	\$3,872	\$22,962,000	\$13,777,200	\$9,184,800	\$46,383	\$50,255	\$33,333	\$191,350	\$224,683	\$274,938
December 2023	\$4,000,000	\$3,266,634	\$733,366	\$3,703	\$22,962,000	\$13,968,550	\$8,993,450	\$45,417	\$49,120	\$33,333	\$191,350	\$224,683	\$273,803
January 2024	\$4,000,000	\$3,299,967	\$700,033	\$3,535	\$22,962,000	\$14,159,900	\$8,802,100	\$44,451	\$47,986	\$33,333	\$191,350	\$224,683	\$272,669
February	\$4,000,000	\$3,333,300	\$666,700	\$3,367	\$22,962,000	\$14,351,250	\$8,610,750	\$43,484	\$46,851	\$33,333	\$191,350	\$224,683	\$271,534
March	\$4,000,000	\$3,366,633	\$633,367	\$3,199	\$22,962,000	\$14,542,600	\$8,419,400	\$42,518	\$45,717	\$33,333	\$191,350	\$224,683	\$270,400
April	\$4,000,000	\$3,399,966	\$600,034	\$3,030	\$22,962,000	\$14,733,950	\$8,228,050	\$41,552	\$44,582	\$33,333	\$191,350	\$224,683	\$269,265
May	\$4,000,000	\$3,433,299	\$566,701	\$2,862	\$22,962,000	\$14,925,300	\$8,036,700	\$40,585	\$43,447	\$33,333	\$191,350	\$224,683	\$268,130
June	\$4,000,000	\$3,466,632	\$533,368	\$2,694	\$22,962,000	\$15,116,650	\$7,845,350	\$39,619	\$42,313	\$33,333	\$191,350	\$224,683	\$266,996
July	\$4,000,000	\$3,499,965	\$500,035	\$2,525	\$22,962,000	\$15,308,000	\$7,654,000	\$38,653	\$41,178	\$33,333	\$191,350	\$224,683	\$265,861
August	\$4,000,000	\$3,533,298	\$466,702	\$2,357	\$22,962,000	\$15,499,350	\$7,462,650	\$37,686	\$40,043	\$33,333	\$191,350	\$224,683	\$264,726
September	\$4,000,000	\$3,566,631	\$433,369	\$2,189	\$22,962,000	\$15,690,700	\$7,271,300	\$36,720	\$38,909	\$33,333	\$191,350	\$224,683	\$263,592
October	\$4,000,000	\$3,599,964	\$400,036	\$2,020	\$22,962,000	\$15,882,050	\$7,079,950	\$35,754	\$37,774	\$33,333	\$191,350	\$224,683	\$262,457
November	\$4,000,000	\$3,633,297	\$366,703	\$1,852	\$22,962,000	\$16,073,400	\$6,888,600	\$34,787	\$36,639	\$33,333	\$191,350	\$224,683	\$261,322
December 2024	\$4,000,000	\$3,666,630	\$333,370	\$1,684	\$22,962,000	\$16,264,750	\$6,697,250	\$33,821	\$35,505	\$33,333	\$191,350	\$224,683	\$260,188
January 2025	\$4,000,000	\$3,699,963	\$300,037	\$1,515	\$22,962,000	\$16,456,100	\$6,505,900	\$32,855	\$34,370	\$33,333	\$191,350	\$224,683	\$259,053
February	\$4,000,000	\$3,733,296	\$266,704	\$1,347	\$22,962,000	\$16,647,450	\$6,314,550	\$31,888	\$33,235	\$33,333	\$191,350	\$224,683	\$257,918
March	\$4,000,000	\$3,766,629	\$233,371	\$1,179	\$22,962,000	\$16,838,800	\$6,123,200	\$30,922	\$32,101	\$33,333	\$191,350	\$224,683	\$256,784
April	\$4,000,000	\$3,799,962	\$200,038	\$1,010	\$22,962,000	\$17,030,150	\$5,931,850	\$29,956	\$30,966	\$33,333	\$191,350	\$224,683	\$255,649
May	\$4,000,000	\$3,833,295	\$166,705	\$842	\$22,962,000	\$17,221,500	\$5,740,500	\$28,990	\$29,832	\$33,333	\$191,350	\$224,683	\$254,515
June	\$4,000,000	\$3,866,628	\$133,372	\$674	\$22,962,000	\$17,412,850	\$5,549,150	\$28,023	\$28,697	\$33,333	\$191,350	\$224,683	\$253,380
July	\$4,000,000	\$3,899,961	\$100,039	\$505	\$22,962,000	\$17,604,200	\$5,357,800	\$27,057	\$27,562	\$33,333	\$191,350	\$224,683	\$252,245
August	\$4,000,000	\$3,933,294	\$66,706	\$337	\$22,962,000	\$17,795,550	\$5,166,450	\$26,091	\$26,428	\$33,333	\$191,350	\$224,683	\$251,111
September	\$4,000,000	\$3,966,627	\$33,373	\$169	\$22,962,000	\$17,986,900	\$4,975,100	\$25,124	\$25,293	\$33,333	\$191,350	\$224,683	\$249,976
October	\$4,000,000	\$3,999,960	\$0	\$0	\$22,962,000	\$18,178,250	\$4,783,750	\$24,158	\$24,158	\$33,333	\$191,350	\$224,683	\$248,841
November	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$18,369,600	\$4,592,400	\$23,192	\$23,192	\$40	\$191,350	\$191,390	\$214,582

Assumptions:	Landfill Cell construction costs	\$4,000,000
	Ash Transfer costs	\$22,962,000
	Annual Rate of Return on Rate Base	6.06%
	Monthly Rate of Return on Rate Base	0.505%

10 Year Amortization of Investment - Return on Rate Base

Month	Landfill Cell Component			Monthly Return on Rate Base	Ash Transfer Component			Total Monthly Return	Monthly Amortization Expense			Combined Return and Expense	
	Investment	Accumulated Amortization	Net Investment		Investment	Accumulated Amortization	Net Investment		Landfill Cell	Ash Transfer	Total Amortization Expense		
December 2025	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$18,660,950	\$4,401,050	\$22,225	\$22,225	\$0	\$191,350	\$191,350	\$213,575
January 2026	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$18,752,300	\$4,209,700	\$21,259	\$21,259	\$0	\$191,350	\$191,350	\$212,609
February	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$18,943,650	\$4,018,350	\$20,293	\$20,293	\$0	\$191,350	\$191,350	\$211,643
March	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$19,135,000	\$3,827,000	\$19,326	\$19,326	\$0	\$191,350	\$191,350	\$210,676
April	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$19,326,350	\$3,635,650	\$18,360	\$18,360	\$0	\$191,350	\$191,350	\$209,710
May	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$19,517,700	\$3,444,300	\$17,394	\$17,394	\$0	\$191,350	\$191,350	\$208,744
June	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$19,709,050	\$3,252,950	\$16,427	\$16,427	\$0	\$191,350	\$191,350	\$207,777
July	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$19,900,400	\$3,061,600	\$15,461	\$15,461	\$0	\$191,350	\$191,350	\$206,811
August	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$20,091,750	\$2,870,250	\$14,495	\$14,495	\$0	\$191,350	\$191,350	\$205,845
September	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$20,283,100	\$2,678,900	\$13,528	\$13,528	\$0	\$191,350	\$191,350	\$204,878
October	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$20,474,450	\$2,487,550	\$12,562	\$12,562	\$0	\$191,350	\$191,350	\$203,912
November	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$20,665,800	\$2,296,200	\$11,596	\$11,596	\$0	\$191,350	\$191,350	\$202,946
December 2026	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$20,857,150	\$2,104,850	\$10,629	\$10,629	\$0	\$191,350	\$191,350	\$201,979
January 2027	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,048,500	\$1,913,500	\$9,663	\$9,663	\$0	\$191,350	\$191,350	\$201,013
February	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,239,850	\$1,722,150	\$8,697	\$8,697	\$0	\$191,350	\$191,350	\$200,047
March	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,431,200	\$1,530,800	\$7,731	\$7,731	\$0	\$191,350	\$191,350	\$199,081
April	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,622,550	\$1,339,450	\$6,764	\$6,764	\$0	\$191,350	\$191,350	\$198,114
May	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,813,900	\$1,148,100	\$5,798	\$5,798	\$0	\$191,350	\$191,350	\$197,148
June	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,005,250	\$956,750	\$4,832	\$4,832	\$0	\$191,350	\$191,350	\$196,182
July	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,196,600	\$765,400	\$3,865	\$3,865	\$0	\$191,350	\$191,350	\$195,215
August	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,387,950	\$574,050	\$2,899	\$2,899	\$0	\$191,350	\$191,350	\$194,249
September	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,579,300	\$382,700	\$1,933	\$1,933	\$0	\$191,350	\$191,350	\$193,283
October	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,770,650	\$191,350	\$966	\$966	\$0	\$191,350	\$191,350	\$192,316
November	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,962,000	\$0	\$0	\$0	\$0	\$191,350	\$191,350	\$191,350
December 2027	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,962,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Totals				\$1,272,607				\$8,468,170	\$9,740,777	\$4,000,000	\$22,962,000	\$26,962,000	\$36,702,777

Assumptions:	Landfill Cell construction costs	\$4,000,000
	Ash Transfer costs	\$22,962,000
	Annual Rate of Return on Rate Base	6.08%
	Monthly Rate of Return on Rate Base	0.505%

25 Year Amortization of Investment - Return on Rate Base

Month	Landfill Cell Component			Ash Transfer Component			Total Monthly Return	Monthly Amortization Expense			Combined Return and Expense
	Investment	Accumulated Amortization	Net Investment	Investment	Accumulated Amortization	Net Investment		Landfill Cell	Ash Transfer	Total Amortization Expense	
April 2015	\$500,000		\$500,000	\$948,250		\$948,250	\$4,789	\$7,314			\$7,314
May	\$1,000,000		\$1,000,000	\$1,276,500		\$1,276,500	\$6,446	\$11,496			\$11,496
June	\$1,500,000		\$1,500,000	\$1,604,750		\$1,604,750	\$8,104	\$15,679			\$15,679
July	\$2,000,000		\$2,000,000	\$1,933,000		\$1,933,000	\$9,762	\$19,862			\$19,862
August	\$2,500,000		\$2,500,000	\$2,261,250		\$2,261,250	\$11,419	\$24,044			\$24,044
September	\$3,000,000		\$3,000,000	\$2,589,500		\$2,589,500	\$13,077	\$28,227			\$28,227
October	\$3,500,000		\$3,500,000	\$2,917,750		\$2,917,750	\$14,735	\$32,410			\$32,410
November	\$4,000,000	\$13,333	\$3,986,667	\$3,246,000		\$3,246,000	\$16,392	\$36,525	\$13,333	\$13,333	\$49,858
December 2015	\$4,000,000	\$26,666	\$3,973,334	\$3,246,000		\$3,246,000	\$16,392	\$36,457	\$13,333	\$13,333	\$49,790
January 2016	\$4,000,000	\$39,999	\$3,960,001	\$3,246,000		\$3,246,000	\$16,392	\$36,390	\$13,333	\$13,333	\$49,723
February	\$4,000,000	\$53,332	\$3,946,668	\$3,246,000		\$3,246,000	\$16,392	\$36,323	\$13,333	\$13,333	\$49,656
March	\$4,000,000	\$66,665	\$3,933,335	\$3,246,000		\$3,246,000	\$16,392	\$36,255	\$13,333	\$13,333	\$49,588
April	\$4,000,000	\$79,998	\$3,920,002	\$4,571,250		\$4,571,250	\$23,085	\$42,881	\$13,333	\$13,333	\$56,214
May	\$4,000,000	\$93,331	\$3,906,669	\$4,571,250		\$4,571,250	\$23,085	\$42,814	\$13,333	\$13,333	\$56,147
June	\$4,000,000	\$106,664	\$3,893,336	\$4,571,250		\$4,571,250	\$23,085	\$42,747	\$13,333	\$13,333	\$56,080
July	\$4,000,000	\$119,997	\$3,880,003	\$4,571,250		\$4,571,250	\$23,085	\$42,680	\$13,333	\$13,333	\$56,013
August	\$4,000,000	\$133,330	\$3,866,670	\$4,571,250		\$4,571,250	\$23,085	\$42,613	\$13,333	\$13,333	\$55,946
September	\$4,000,000	\$146,663	\$3,853,337	\$4,571,250		\$4,571,250	\$23,085	\$42,546	\$13,333	\$13,333	\$55,879
October	\$4,000,000	\$159,996	\$3,840,004	\$4,571,250		\$4,571,250	\$23,085	\$42,479	\$13,333	\$13,333	\$55,812
November	\$4,000,000	\$173,329	\$3,826,671	\$4,571,250		\$4,571,250	\$23,085	\$42,412	\$13,333	\$13,333	\$55,745
December 2016	\$4,000,000	\$186,662	\$3,813,338	\$4,571,250		\$4,571,250	\$23,085	\$42,345	\$13,333	\$13,333	\$55,678
January 2017	\$4,000,000	\$199,995	\$3,800,005	\$4,571,250		\$4,571,250	\$23,085	\$42,278	\$13,333	\$13,333	\$55,611
February	\$4,000,000	\$213,328	\$3,786,672	\$4,571,250		\$4,571,250	\$23,085	\$42,211	\$13,333	\$13,333	\$55,544
March	\$4,000,000	\$226,661	\$3,773,339	\$4,571,250		\$4,571,250	\$23,085	\$42,144	\$13,333	\$13,333	\$55,477
April	\$4,000,000	\$239,994	\$3,760,006	\$4,571,250		\$4,571,250	\$23,085	\$42,077	\$13,333	\$13,333	\$55,410
May	\$4,000,000	\$253,327	\$3,746,673	\$4,571,250		\$4,571,250	\$23,085	\$42,010	\$13,333	\$13,333	\$55,343
June	\$4,000,000	\$266,660	\$3,733,340	\$4,571,250		\$4,571,250	\$23,085	\$41,943	\$13,333	\$13,333	\$55,276
July	\$4,000,000	\$279,993	\$3,720,007	\$4,571,250		\$4,571,250	\$23,085	\$41,876	\$13,333	\$13,333	\$55,209
August	\$4,000,000	\$293,326	\$3,706,674	\$4,571,250		\$4,571,250	\$23,085	\$41,809	\$13,333	\$13,333	\$55,142
September	\$4,000,000	\$306,659	\$3,693,341	\$4,571,250		\$4,571,250	\$23,085	\$41,742	\$13,333	\$13,333	\$55,075
October	\$4,000,000	\$319,992	\$3,680,008	\$4,571,250		\$4,571,250	\$23,085	\$41,675	\$13,333	\$13,333	\$55,008
November	\$4,000,000	\$333,325	\$3,666,675	\$4,571,250		\$4,571,250	\$23,085	\$41,608	\$13,333	\$13,333	\$54,941
December 2017	\$4,000,000	\$346,658	\$3,653,342	\$4,571,250	\$76,540	\$22,962,000	\$115,958	\$134,475	\$13,333	\$13,333	\$147,808
January 2018	\$4,000,000	\$359,991	\$3,640,009	\$4,571,250	\$153,080	\$22,885,460	\$115,572	\$134,021	\$13,333	\$76,540	\$223,894
February	\$4,000,000	\$373,324	\$3,626,676	\$4,571,250	\$229,620	\$22,808,920	\$115,186	\$133,567	\$13,333	\$76,540	\$223,440
March	\$4,000,000	\$386,657	\$3,613,343	\$4,571,250	\$306,160	\$22,732,380	\$114,799	\$133,114	\$13,333	\$76,540	\$222,987
April	\$4,000,000	\$399,990	\$3,600,010	\$4,571,250	\$382,700	\$22,655,840	\$114,412	\$132,659	\$13,333	\$76,540	\$222,533
May	\$4,000,000	\$413,323	\$3,586,677	\$4,571,250	\$459,240	\$22,579,300	\$114,025	\$132,205	\$13,333	\$76,540	\$222,079
June	\$4,000,000	\$426,656	\$3,573,344	\$4,571,250	\$535,780	\$22,502,760	\$113,639	\$131,752	\$13,333	\$76,540	\$221,625
July	\$4,000,000	\$439,989	\$3,560,011	\$4,571,250	\$612,320	\$22,426,220	\$113,252	\$131,297	\$13,333	\$76,540	\$221,171
August	\$4,000,000	\$453,322	\$3,546,678	\$4,571,250	\$688,860	\$22,349,680	\$112,866	\$130,844	\$13,333	\$76,540	\$220,717
September	\$4,000,000	\$466,655	\$3,533,345	\$4,571,250	\$765,400	\$22,273,140	\$112,479	\$130,390	\$13,333	\$76,540	\$220,263
October	\$4,000,000	\$479,988	\$3,520,012	\$4,571,250	\$841,940	\$22,196,600	\$112,093	\$129,936	\$13,333	\$76,540	\$219,809
November	\$4,000,000	\$493,321	\$3,506,679	\$4,571,250	\$918,480	\$22,120,060	\$111,706	\$129,482	\$13,333	\$76,540	\$219,355
December 2018	\$4,000,000	\$506,654	\$3,493,346	\$4,571,250	\$995,020	\$22,043,520	\$111,320	\$129,029	\$13,333	\$76,540	\$218,902
January 2019	\$4,000,000	\$519,987	\$3,480,013	\$4,571,250	\$1,071,560	\$21,966,980	\$110,933	\$128,575	\$13,333	\$76,540	\$218,447
February	\$4,000,000	\$533,320	\$3,466,680	\$4,571,250	\$1,148,100	\$21,890,440	\$110,547	\$128,121	\$13,333	\$76,540	\$217,994
March	\$4,000,000	\$546,653	\$3,453,347	\$4,571,250	\$1,224,640	\$21,813,900	\$110,160	\$127,667	\$13,333	\$76,540	\$217,540
April	\$4,000,000	\$559,986	\$3,440,014	\$4,571,250	\$1,301,180	\$21,737,360	\$109,774	\$127,213	\$13,333	\$76,540	\$217,086
May	\$4,000,000	\$573,319	\$3,426,681	\$4,571,250	\$1,377,720	\$21,660,820	\$109,387	\$126,759	\$13,333	\$76,540	\$216,632
June	\$4,000,000	\$586,652	\$3,413,348	\$4,571,250	\$1,454,260	\$21,584,280	\$109,001	\$126,305	\$13,333	\$76,540	\$216,178
July	\$4,000,000	\$599,985	\$3,400,015	\$4,571,250	\$1,530,800	\$21,507,740	\$108,614	\$125,851	\$13,333	\$76,540	\$215,724
August	\$4,000,000	\$613,318	\$3,386,682	\$4,571,250	\$1,607,340	\$21,431,200	\$108,228	\$125,398	\$13,333	\$76,540	\$215,271
September	\$4,000,000	\$626,651	\$3,373,349	\$4,571,250	\$1,683,880	\$21,354,660	\$107,841	\$124,944	\$13,333	\$76,540	\$214,817
October	\$4,000,000	\$639,984	\$3,360,016	\$4,571,250	\$1,760,420	\$21,278,120	\$107,455	\$124,490	\$13,333	\$76,540	\$214,363
November	\$4,000,000	\$653,317	\$3,346,683	\$4,571,250	\$1,836,960	\$21,201,580	\$107,068	\$124,036	\$13,333	\$76,540	\$213,909
December 2019	\$4,000,000	\$666,650	\$3,333,350	\$4,571,250	\$1,913,500	\$21,125,040	\$106,681	\$123,582	\$13,333	\$76,540	\$213,455
January 2020	\$4,000,000	\$679,983	\$3,320,017	\$4,571,250	\$1,990,040	\$21,048,500	\$106,295	\$123,128	\$13,333	\$76,540	\$213,001
February	\$4,000,000	\$693,316	\$3,306,684	\$4,571,250	\$2,066,580	\$20,971,960	\$105,909	\$122,674	\$13,333	\$76,540	\$212,547
March	\$4,000,000	\$706,649	\$3,293,351	\$4,571,250	\$2,143,120	\$20,895,420	\$105,522	\$122,220	\$13,333	\$76,540	\$212,093
April	\$4,000,000	\$719,982	\$3,280,018	\$4,571,250	\$2,219,660	\$20,818,880	\$105,135	\$121,766	\$13,333	\$76,540	\$211,639
May	\$4,000,000	\$733,315	\$3,266,685	\$4,571,250	\$2,296,200	\$20,742,340	\$104,749	\$121,312	\$13,333	\$76,540	\$211,185
June	\$4,000,000	\$746,648	\$3,253,352	\$4,571,250	\$2,372,740	\$20,665,800	\$104,362	\$120,858	\$13,333	\$76,540	\$210,731
July	\$4,000,000	\$759,981	\$3,240,019	\$4,571,250	\$2,449,280	\$20,589,260	\$103,976	\$120,404	\$13,333	\$76,540	\$210,277
						\$20,512,720	\$103,589	\$119,951	\$13,333	\$76,540	\$209,823

Assumptions:	Landfill Cell construction costs	\$4,000,000
	Ash Transfer costs	\$22,962,000
	Annual Rate of Return on Rate Base	6.06%
	Monthly Rate of Return on Rate Base	0.505%

25 Year Amortization of Investment - Return on Rate Base

Month	Landfill Cell Component				Ash Transfer Component				Total Monthly Return	Monthly Amortization Expense			Combined Return and Expense
	Investment	Accumulated Amortization	Net Investment	Monthly Return on Rate Base	Investment	Accumulated Amortization	Net Investment	Monthly Return on Rate Base		Landfill Cell	Ash Transfer	Total Amortization Expense	
August	\$4,000,000	\$773,314	\$3,226,686	\$16,295	\$22,962,000	\$2,525,820	\$20,436,180	\$103,203	\$119,498	\$13,333	\$76,540	\$89,873	\$209,371
September	\$4,000,000	\$786,647	\$3,213,353	\$16,227	\$22,962,000	\$2,602,360	\$20,359,640	\$102,816	\$119,043	\$13,333	\$76,540	\$89,873	\$208,916
October	\$4,000,000	\$799,980	\$3,200,020	\$16,160	\$22,962,000	\$2,678,900	\$20,283,100	\$102,430	\$118,590	\$13,333	\$76,540	\$89,873	\$208,463
November	\$4,000,000	\$813,313	\$3,186,687	\$16,093	\$22,962,000	\$2,755,440	\$20,206,560	\$102,043	\$118,136	\$13,333	\$76,540	\$89,873	\$208,009
December 2020	\$4,000,000	\$826,646	\$3,173,354	\$16,025	\$22,962,000	\$2,831,980	\$20,130,020	\$101,657	\$117,682	\$13,333	\$76,540	\$89,873	\$207,555
January 2021	\$4,000,000	\$839,979	\$3,160,021	\$15,958	\$22,962,000	\$2,908,520	\$20,053,480	\$101,270	\$117,228	\$13,333	\$76,540	\$89,873	\$207,101
February	\$4,000,000	\$853,312	\$3,146,688	\$15,891	\$22,962,000	\$2,985,060	\$19,976,940	\$100,884	\$116,775	\$13,333	\$76,540	\$89,873	\$206,648
March	\$4,000,000	\$866,645	\$3,133,355	\$15,823	\$22,962,000	\$3,061,600	\$19,900,400	\$100,497	\$116,320	\$13,333	\$76,540	\$89,873	\$206,193
April	\$4,000,000	\$879,978	\$3,120,022	\$15,756	\$22,962,000	\$3,138,140	\$19,823,860	\$100,110	\$115,866	\$13,333	\$76,540	\$89,873	\$205,739
May	\$4,000,000	\$893,311	\$3,106,689	\$15,689	\$22,962,000	\$3,214,680	\$19,747,320	\$99,724	\$115,413	\$13,333	\$76,540	\$89,873	\$205,286
June	\$4,000,000	\$906,644	\$3,093,356	\$15,621	\$22,962,000	\$3,291,220	\$19,670,780	\$99,337	\$114,958	\$13,333	\$76,540	\$89,873	\$204,832
July	\$4,000,000	\$919,977	\$3,080,023	\$15,554	\$22,962,000	\$3,367,760	\$19,594,240	\$98,951	\$114,505	\$13,333	\$76,540	\$89,873	\$204,378
August	\$4,000,000	\$933,310	\$3,066,690	\$15,487	\$22,962,000	\$3,444,300	\$19,517,700	\$98,564	\$114,051	\$13,333	\$76,540	\$89,873	\$203,924
September	\$4,000,000	\$946,643	\$3,053,357	\$15,419	\$22,962,000	\$3,520,840	\$19,441,160	\$98,178	\$113,597	\$13,333	\$76,540	\$89,873	\$203,470
October	\$4,000,000	\$959,976	\$3,040,024	\$15,352	\$22,962,000	\$3,597,380	\$19,364,620	\$97,791	\$113,143	\$13,333	\$76,540	\$89,873	\$203,016
November	\$4,000,000	\$973,309	\$3,026,691	\$15,285	\$22,962,000	\$3,673,920	\$19,288,080	\$97,405	\$112,690	\$13,333	\$76,540	\$89,873	\$202,563
December 2021	\$4,000,000	\$986,642	\$3,013,358	\$15,217	\$22,962,000	\$3,750,460	\$19,211,540	\$97,018	\$112,235	\$13,333	\$76,540	\$89,873	\$202,108
January 2022	\$4,000,000	\$999,975	\$3,000,025	\$15,150	\$22,962,000	\$3,827,000	\$19,135,000	\$96,632	\$111,782	\$13,333	\$76,540	\$89,873	\$201,655
February	\$4,000,000	\$1,013,308	\$2,986,692	\$15,083	\$22,962,000	\$3,903,540	\$19,058,460	\$96,245	\$111,328	\$13,333	\$76,540	\$89,873	\$201,201
March	\$4,000,000	\$1,026,641	\$2,973,359	\$15,015	\$22,962,000	\$3,980,080	\$18,981,920	\$95,859	\$110,874	\$13,333	\$76,540	\$89,873	\$200,747
April	\$4,000,000	\$1,039,974	\$2,960,026	\$14,948	\$22,962,000	\$4,056,620	\$18,905,380	\$95,472	\$110,420	\$13,333	\$76,540	\$89,873	\$200,293
May	\$4,000,000	\$1,053,307	\$2,946,693	\$14,881	\$22,962,000	\$4,133,160	\$18,828,840	\$95,086	\$109,967	\$13,333	\$76,540	\$89,873	\$199,840
June	\$4,000,000	\$1,066,640	\$2,933,360	\$14,813	\$22,962,000	\$4,209,700	\$18,752,300	\$94,699	\$109,512	\$13,333	\$76,540	\$89,873	\$199,385
July	\$4,000,000	\$1,079,973	\$2,920,027	\$14,746	\$22,962,000	\$4,286,240	\$18,675,760	\$94,313	\$109,059	\$13,333	\$76,540	\$89,873	\$198,932
August	\$4,000,000	\$1,093,306	\$2,906,694	\$14,679	\$22,962,000	\$4,362,780	\$18,599,220	\$93,926	\$108,605	\$13,333	\$76,540	\$89,873	\$198,478
September	\$4,000,000	\$1,106,639	\$2,893,361	\$14,611	\$22,962,000	\$4,439,320	\$18,522,680	\$93,540	\$108,151	\$13,333	\$76,540	\$89,873	\$198,024
October	\$4,000,000	\$1,119,972	\$2,880,028	\$14,544	\$22,962,000	\$4,515,860	\$18,446,140	\$93,153	\$107,697	\$13,333	\$76,540	\$89,873	\$197,570
November	\$4,000,000	\$1,133,305	\$2,866,695	\$14,477	\$22,962,000	\$4,592,400	\$18,369,600	\$92,766	\$107,243	\$13,333	\$76,540	\$89,873	\$197,116
December 2022	\$4,000,000	\$1,146,638	\$2,853,362	\$14,409	\$22,962,000	\$4,668,940	\$18,293,060	\$92,380	\$106,789	\$13,333	\$76,540	\$89,873	\$196,662
January 2023	\$4,000,000	\$1,159,971	\$2,840,029	\$14,342	\$22,962,000	\$4,745,480	\$18,216,520	\$91,993	\$106,335	\$13,333	\$76,540	\$89,873	\$196,208
February	\$4,000,000	\$1,173,304	\$2,826,696	\$14,275	\$22,962,000	\$4,822,020	\$18,139,980	\$91,607	\$105,882	\$13,333	\$76,540	\$89,873	\$195,755
March	\$4,000,000	\$1,186,637	\$2,813,363	\$14,207	\$22,962,000	\$4,898,560	\$18,063,440	\$91,220	\$105,427	\$13,333	\$76,540	\$89,873	\$195,300
April	\$4,000,000	\$1,199,970	\$2,800,030	\$14,140	\$22,962,000	\$4,975,100	\$17,986,900	\$90,834	\$104,974	\$13,333	\$76,540	\$89,873	\$194,847
May	\$4,000,000	\$1,213,303	\$2,786,697	\$14,073	\$22,962,000	\$5,051,640	\$17,910,360	\$90,447	\$104,520	\$13,333	\$76,540	\$89,873	\$194,393
June	\$4,000,000	\$1,226,636	\$2,773,364	\$14,005	\$22,962,000	\$5,128,180	\$17,833,820	\$90,061	\$104,066	\$13,333	\$76,540	\$89,873	\$193,939
July	\$4,000,000	\$1,239,969	\$2,760,031	\$13,938	\$22,962,000	\$5,204,720	\$17,757,280	\$89,674	\$103,612	\$13,333	\$76,540	\$89,873	\$193,485
August	\$4,000,000	\$1,253,302	\$2,746,698	\$13,871	\$22,962,000	\$5,281,260	\$17,680,740	\$89,288	\$103,159	\$13,333	\$76,540	\$89,873	\$193,032
September	\$4,000,000	\$1,266,635	\$2,733,365	\$13,803	\$22,962,000	\$5,357,800	\$17,604,200	\$88,901	\$102,704	\$13,333	\$76,540	\$89,873	\$192,577
October	\$4,000,000	\$1,279,968	\$2,720,032	\$13,736	\$22,962,000	\$5,434,340	\$17,527,660	\$88,515	\$102,251	\$13,333	\$76,540	\$89,873	\$192,124
November	\$4,000,000	\$1,293,301	\$2,706,699	\$13,669	\$22,962,000	\$5,510,880	\$17,451,120	\$88,128	\$101,797	\$13,333	\$76,540	\$89,873	\$191,670
December 2023	\$4,000,000	\$1,306,634	\$2,693,366	\$13,601	\$22,962,000	\$5,587,420	\$17,374,580	\$87,742	\$101,343	\$13,333	\$76,540	\$89,873	\$191,216
January 2024	\$4,000,000	\$1,319,967	\$2,680,033	\$13,534	\$22,962,000	\$5,663,960	\$17,298,040	\$87,355	\$100,889	\$13,333	\$76,540	\$89,873	\$190,762
February	\$4,000,000	\$1,333,300	\$2,666,700	\$13,467	\$22,962,000	\$5,740,500	\$17,221,500	\$86,969	\$100,436	\$13,333	\$76,540	\$89,873	\$190,309
March	\$4,000,000	\$1,346,633	\$2,653,367	\$13,400	\$22,962,000	\$5,817,040	\$17,144,960	\$86,582	\$99,982	\$13,333	\$76,540	\$89,873	\$189,855
April	\$4,000,000	\$1,359,966	\$2,640,034	\$13,332	\$22,962,000	\$5,893,580	\$17,068,420	\$86,196	\$99,528	\$13,333	\$76,540	\$89,873	\$189,401
May	\$4,000,000	\$1,373,299	\$2,626,701	\$13,265	\$22,962,000	\$5,970,120	\$16,991,880	\$85,809	\$99,074	\$13,333	\$76,540	\$89,873	\$188,947
June	\$4,000,000	\$1,386,632	\$2,613,368	\$13,198	\$22,962,000	\$6,046,660	\$16,915,340	\$85,422	\$98,620	\$13,333	\$76,540	\$89,873	\$188,493
July	\$4,000,000	\$1,399,965	\$2,600,035	\$13,130	\$22,962,000	\$6,123,200	\$16,838,800	\$85,036	\$98,166	\$13,333	\$76,540	\$89,873	\$188,039
August	\$4,000,000	\$1,413,298	\$2,586,702	\$13,063	\$22,962,000	\$6,199,740	\$16,762,260	\$84,649	\$97,712	\$13,333	\$76,540	\$89,873	\$187,585
September	\$4,000,000	\$1,426,631	\$2,573,369	\$12,996	\$22,962,000	\$6,276,280	\$16,685,720	\$84,263	\$97,259	\$13,333	\$76,540	\$89,873	\$187,132
October	\$4,000,000	\$1,439,964	\$2,560,036	\$12,928	\$22,962,000	\$6,352,820	\$16,609,180	\$83,876	\$96,804	\$13,333	\$76,540	\$89,873	\$186,678
November	\$4,000,000	\$1,453,297	\$2,546,703	\$12,861	\$22,962,000	\$6,429,360	\$16,532,640	\$83,490	\$96,351	\$13,333	\$76,540	\$89,873	\$186,224
December 2024	\$4,000,000	\$1,466,630	\$2,533,370	\$12,794	\$22,962,000	\$6,505,900	\$16,456,100	\$83,103	\$95,897	\$13,333	\$76,540	\$89,873	\$185,770
January 2025	\$4,000,000	\$1,479,963	\$2,520,037	\$12,726	\$22,962,000	\$6,582,440	\$16,379,560	\$82,717	\$95,443	\$13,333	\$76,540	\$89,873	\$185,316
February	\$4,000,000	\$1,493,296	\$2,506,704	\$12,659	\$22,962,000	\$6,658,980	\$16,303,020	\$82,330	\$94,989	\$13,333	\$76,540	\$89,873	\$184,862
March	\$4,000,000	\$1,506,629	\$2,493,371	\$12,592	\$22,962,000	\$6,735,520	\$16,226,480	\$81,944	\$94,536	\$13,333	\$76,540	\$89,873	\$184,409
April	\$4,000,000	\$1,519,962	\$2,480,038	\$12,524	\$22,962,000	\$6,812,060	\$16,149,940	\$81,557	\$94,081	\$13,333	\$76,540	\$89,873	\$183,955
May	\$4,000,000	\$1,533,295	\$2,466,705	\$12,457	\$22,962,000	\$6,888,600	\$16,073,400	\$81,171	\$93,628	\$13,333	\$76,540	\$89,873	\$183,501
June	\$4,000,000	\$1,546,628	\$2,453,372	\$12,390	\$22,962,000	\$6,965,140	\$15,996,860	\$80,784	\$93,174	\$13,333	\$76,540	\$89,873	\$183,047
July	\$4,000,000	\$1,559,961	\$2,440,039	\$12,322	\$22,962,000	\$7,041,680	\$15,920,320	\$80,398	\$92,720	\$13,333	\$76,540	\$89,873	\$182,593
August	\$4,000,000	\$1,573,294	\$2,426,706	\$12,255	\$22,962,000	\$7,118,220	\$15,843,780	\$80,011	\$92,266	\$13,333	\$76,540	\$89,873	\$182,139
September	\$4,000,000	\$1,586,627	\$2,413,373	\$12,188	\$22,962,000	\$7,194,760	\$15,767,240	\$79,625	\$91,813	\$13,333	\$76,540	\$89,873	\$181,686
October	\$4,000,000	\$1,599,960	\$2,400,040	\$12,120	\$22,962,000	\$7,271,300	\$15,690,700	\$79,238	\$91,358	\$13,333	\$76,540	\$89,873	\$181,232
November	\$4,000,000	\$1,613,293	\$2,386,707	\$12,053	\$22,962,000	\$7,347,840	\$15,614,160	\$78,852	\$90,905	\$13,333	\$76,540	\$89,873	\$180,778

Assumptions:	Landfill Cell construction costs	\$4,000,000
	Ash Transfer costs	\$22,962,000
	Annual Rate of Return on Rate Base	6.06%
	Monthly Rate of Return on Rate Base	0.505%

25 Year Amortization of Investment - Return on Rate Base

Month	Landfill Cell Component				Ash Transfer Component				Total Monthly Return	Monthly Amortization Expense			Combined Return and Expense
	Investment	Accumulated Amortization	Net Investment	Monthly Return on Rate Base	Investment	Accumulated Amortization	Net Investment	Monthly Return on Rate Base		Landfill Cell	Ash Transfer	Total Amortization Expense	
December 2025	\$4,000,000	\$1,626,626	\$2,373,374	\$11,986	\$22,962,000	\$7,424,380	\$15,537,620	\$78,465	\$90,451	\$13,333	\$76,540	\$89,873	\$180,324
January 2026	\$4,000,000	\$1,639,959	\$2,360,041	\$11,918	\$22,962,000	\$7,500,920	\$15,461,080	\$78,078	\$89,996	\$13,333	\$76,540	\$89,873	\$179,869
February	\$4,000,000	\$1,653,292	\$2,346,708	\$11,851	\$22,962,000	\$7,577,460	\$15,384,540	\$77,692	\$89,543	\$13,333	\$76,540	\$89,873	\$179,416
March	\$4,000,000	\$1,666,625	\$2,333,375	\$11,784	\$22,962,000	\$7,654,000	\$15,308,000	\$77,305	\$89,089	\$13,333	\$76,540	\$89,873	\$178,962
April	\$4,000,000	\$1,679,958	\$2,320,042	\$11,716	\$22,962,000	\$7,730,540	\$15,231,460	\$76,919	\$88,635	\$13,333	\$76,540	\$89,873	\$178,508
May	\$4,000,000	\$1,693,291	\$2,306,709	\$11,649	\$22,962,000	\$7,807,080	\$15,154,920	\$76,532	\$88,181	\$13,333	\$76,540	\$89,873	\$178,054
June	\$4,000,000	\$1,706,624	\$2,293,376	\$11,582	\$22,962,000	\$7,883,620	\$15,078,380	\$76,146	\$87,728	\$13,333	\$76,540	\$89,873	\$177,601
July	\$4,000,000	\$1,719,957	\$2,280,043	\$11,514	\$22,962,000	\$7,960,160	\$15,001,840	\$75,759	\$87,273	\$13,333	\$76,540	\$89,873	\$177,146
August	\$4,000,000	\$1,733,290	\$2,266,710	\$11,447	\$22,962,000	\$8,036,700	\$14,925,300	\$75,373	\$86,820	\$13,333	\$76,540	\$89,873	\$176,693
September	\$4,000,000	\$1,746,623	\$2,253,377	\$11,380	\$22,962,000	\$8,113,240	\$14,848,760	\$74,986	\$86,366	\$13,333	\$76,540	\$89,873	\$176,239
October	\$4,000,000	\$1,759,956	\$2,240,044	\$11,312	\$22,962,000	\$8,189,780	\$14,772,220	\$74,600	\$85,912	\$13,333	\$76,540	\$89,873	\$175,785
November	\$4,000,000	\$1,773,289	\$2,226,711	\$11,245	\$22,962,000	\$8,266,320	\$14,695,680	\$74,213	\$85,458	\$13,333	\$76,540	\$89,873	\$175,331
December 2026	\$4,000,000	\$1,786,622	\$2,213,378	\$11,178	\$22,962,000	\$8,342,860	\$14,619,140	\$73,827	\$85,005	\$13,333	\$76,540	\$89,873	\$174,878
January 2027	\$4,000,000	\$1,799,955	\$2,200,045	\$11,110	\$22,962,000	\$8,419,400	\$14,542,600	\$73,440	\$84,550	\$13,333	\$76,540	\$89,873	\$174,423
February	\$4,000,000	\$1,813,288	\$2,186,712	\$11,043	\$22,962,000	\$8,495,940	\$14,466,060	\$73,054	\$84,097	\$13,333	\$76,540	\$89,873	\$173,970
March	\$4,000,000	\$1,826,621	\$2,173,379	\$10,976	\$22,962,000	\$8,572,480	\$14,389,520	\$72,667	\$83,643	\$13,333	\$76,540	\$89,873	\$173,516
April	\$4,000,000	\$1,839,954	\$2,160,046	\$10,908	\$22,962,000	\$8,649,020	\$14,312,980	\$72,281	\$83,189	\$13,333	\$76,540	\$89,873	\$173,062
May	\$4,000,000	\$1,853,287	\$2,146,713	\$10,841	\$22,962,000	\$8,725,560	\$14,236,440	\$71,894	\$82,735	\$13,333	\$76,540	\$89,873	\$172,608
June	\$4,000,000	\$1,866,620	\$2,133,380	\$10,774	\$22,962,000	\$8,802,100	\$14,159,900	\$71,507	\$82,281	\$13,333	\$76,540	\$89,873	\$172,154
July	\$4,000,000	\$1,879,953	\$2,120,047	\$10,706	\$22,962,000	\$8,878,640	\$14,083,360	\$71,121	\$81,827	\$13,333	\$76,540	\$89,873	\$171,700
August	\$4,000,000	\$1,893,286	\$2,106,714	\$10,639	\$22,962,000	\$8,955,180	\$14,006,820	\$70,734	\$81,373	\$13,333	\$76,540	\$89,873	\$171,246
September	\$4,000,000	\$1,906,619	\$2,093,381	\$10,572	\$22,962,000	\$9,031,720	\$13,930,280	\$70,348	\$80,920	\$13,333	\$76,540	\$89,873	\$170,793
October	\$4,000,000	\$1,919,952	\$2,080,048	\$10,504	\$22,962,000	\$9,108,260	\$13,853,740	\$69,961	\$80,465	\$13,333	\$76,540	\$89,873	\$170,338
November	\$4,000,000	\$1,933,285	\$2,066,715	\$10,437	\$22,962,000	\$9,184,800	\$13,777,200	\$69,575	\$80,012	\$13,333	\$76,540	\$89,873	\$169,885
December 2027	\$4,000,000	\$1,946,618	\$2,053,382	\$10,370	\$22,962,000	\$9,261,340	\$13,700,660	\$69,188	\$79,558	\$13,333	\$76,540	\$89,873	\$169,431
January 2028	\$4,000,000	\$1,959,951	\$2,040,049	\$10,302	\$22,962,000	\$9,337,880	\$13,624,120	\$68,802	\$79,104	\$13,333	\$76,540	\$89,873	\$168,977
February	\$4,000,000	\$1,973,284	\$2,026,716	\$10,235	\$22,962,000	\$9,414,420	\$13,547,580	\$68,415	\$78,650	\$13,333	\$76,540	\$89,873	\$168,523
March	\$4,000,000	\$1,986,617	\$2,013,383	\$10,168	\$22,962,000	\$9,490,960	\$13,471,040	\$68,029	\$78,197	\$13,333	\$76,540	\$89,873	\$168,070
April	\$4,000,000	\$1,999,950	\$2,000,050	\$10,100	\$22,962,000	\$9,567,500	\$13,394,500	\$67,642	\$77,742	\$13,333	\$76,540	\$89,873	\$167,615
May	\$4,000,000	\$2,013,283	\$1,986,717	\$10,033	\$22,962,000	\$9,644,040	\$13,317,960	\$67,256	\$77,289	\$13,333	\$76,540	\$89,873	\$167,162
June	\$4,000,000	\$2,026,616	\$1,973,384	\$9,966	\$22,962,000	\$9,720,580	\$13,241,420	\$66,869	\$76,835	\$13,333	\$76,540	\$89,873	\$166,708
July	\$4,000,000	\$2,039,949	\$1,960,051	\$9,898	\$22,962,000	\$9,797,120	\$13,164,880	\$66,483	\$76,381	\$13,333	\$76,540	\$89,873	\$166,254
August	\$4,000,000	\$2,053,282	\$1,946,718	\$9,831	\$22,962,000	\$9,873,660	\$13,088,340	\$66,096	\$75,927	\$13,333	\$76,540	\$89,873	\$165,800
September	\$4,000,000	\$2,066,615	\$1,933,385	\$9,764	\$22,962,000	\$9,950,200	\$13,011,800	\$65,710	\$75,474	\$13,333	\$76,540	\$89,873	\$165,347
October	\$4,000,000	\$2,079,948	\$1,920,052	\$9,696	\$22,962,000	\$10,026,740	\$12,935,260	\$65,323	\$75,019	\$13,333	\$76,540	\$89,873	\$164,892
November	\$4,000,000	\$2,093,281	\$1,906,719	\$9,629	\$22,962,000	\$10,103,280	\$12,858,720	\$64,937	\$74,566	\$13,333	\$76,540	\$89,873	\$164,439
December 2028	\$4,000,000	\$2,106,614	\$1,893,386	\$9,562	\$22,962,000	\$10,179,820	\$12,782,180	\$64,550	\$74,112	\$13,333	\$76,540	\$89,873	\$163,985
January 2029	\$4,000,000	\$2,119,947	\$1,880,053	\$9,494	\$22,962,000	\$10,256,360	\$12,705,640	\$64,163	\$73,657	\$13,333	\$76,540	\$89,873	\$163,530
February	\$4,000,000	\$2,133,280	\$1,866,720	\$9,427	\$22,962,000	\$10,332,900	\$12,629,100	\$63,777	\$73,204	\$13,333	\$76,540	\$89,873	\$163,077
March	\$4,000,000	\$2,146,613	\$1,853,387	\$9,360	\$22,962,000	\$10,409,440	\$12,552,560	\$63,390	\$72,750	\$13,333	\$76,540	\$89,873	\$162,623
April	\$4,000,000	\$2,159,946	\$1,840,054	\$9,292	\$22,962,000	\$10,485,980	\$12,476,020	\$63,004	\$72,296	\$13,333	\$76,540	\$89,873	\$162,169
May	\$4,000,000	\$2,173,279	\$1,826,721	\$9,225	\$22,962,000	\$10,562,520	\$12,399,480	\$62,617	\$71,842	\$13,333	\$76,540	\$89,873	\$161,715
June	\$4,000,000	\$2,186,612	\$1,813,388	\$9,158	\$22,962,000	\$10,639,060	\$12,322,940	\$62,231	\$71,389	\$13,333	\$76,540	\$89,873	\$161,262
July	\$4,000,000	\$2,199,945	\$1,800,055	\$9,090	\$22,962,000	\$10,715,600	\$12,246,400	\$61,844	\$70,934	\$13,333	\$76,540	\$89,873	\$160,807
August	\$4,000,000	\$2,213,278	\$1,786,722	\$9,023	\$22,962,000	\$10,792,140	\$12,169,860	\$61,458	\$70,481	\$13,333	\$76,540	\$89,873	\$160,354
September	\$4,000,000	\$2,226,611	\$1,773,389	\$8,956	\$22,962,000	\$10,868,680	\$12,093,320	\$61,071	\$70,027	\$13,333	\$76,540	\$89,873	\$159,900
October	\$4,000,000	\$2,239,944	\$1,760,056	\$8,888	\$22,962,000	\$10,945,220	\$12,016,780	\$60,685	\$69,573	\$13,333	\$76,540	\$89,873	\$159,446
November	\$4,000,000	\$2,253,277	\$1,746,723	\$8,821	\$22,962,000	\$11,021,760	\$11,940,240	\$60,298	\$69,119	\$13,333	\$76,540	\$89,873	\$158,992
December 2029	\$4,000,000	\$2,266,610	\$1,733,390	\$8,754	\$22,962,000	\$11,098,300	\$11,863,700	\$59,912	\$68,666	\$13,333	\$76,540	\$89,873	\$158,539
January 2030	\$4,000,000	\$2,279,943	\$1,720,057	\$8,686	\$22,962,000	\$11,174,840	\$11,787,160	\$59,525	\$68,211	\$13,333	\$76,540	\$89,873	\$158,084
February	\$4,000,000	\$2,293,276	\$1,706,724	\$8,619	\$22,962,000	\$11,251,380	\$11,710,620	\$59,139	\$67,758	\$13,333	\$76,540	\$89,873	\$157,631
March	\$4,000,000	\$2,306,609	\$1,693,391	\$8,552	\$22,962,000	\$11,327,920	\$11,634,080	\$58,752	\$67,304	\$13,333	\$76,540	\$89,873	\$157,177
April	\$4,000,000	\$2,319,942	\$1,680,058	\$8,484	\$22,962,000	\$11,404,460	\$11,557,540	\$58,366	\$66,850	\$13,333	\$76,540	\$89,873	\$156,723
May	\$4,000,000	\$2,333,275	\$1,666,725	\$8,417	\$22,962,000	\$11,481,000	\$11,481,000	\$57,979	\$66,396	\$13,333	\$76,540	\$89,873	\$156,269
June	\$4,000,000	\$2,346,608	\$1,653,392	\$8,350	\$22,962,000	\$11,557,540	\$11,404,460	\$57,593	\$65,943	\$13,333	\$76,540	\$89,873	\$155,816
July	\$4,000,000	\$2,359,941	\$1,640,059	\$8,282	\$22,962,000	\$11,634,080	\$11,327,920	\$57,206	\$65,489	\$13,333	\$76,540	\$89,873	\$155,361
August	\$4,000,000	\$2,373,274	\$1,626,726	\$8,215	\$22,962,000	\$11,710,620	\$11,251,380	\$56,819	\$65,034	\$13,333	\$76,540	\$89,873	\$154,907
September	\$4,000,000	\$2,386,607	\$1,613,393	\$8,148	\$22,962,000	\$11,787,160	\$11,174,840	\$56,433	\$64,581	\$13,333	\$76,540	\$89,873	\$154,454
October	\$4,000,000	\$2,399,940	\$1,600,060	\$8,080	\$22,962,000	\$11,863,700	\$11,098,300	\$56,046	\$64,126	\$13,333	\$76,540	\$89,873	\$153,999
November	\$4,000,000	\$2,413,273	\$1,586,727	\$8,013	\$22,962,000	\$11,940,240	\$11,021,760	\$55,660	\$63,673	\$13,333	\$76,540	\$89,873	\$153,546
December 2030	\$4,000,000	\$2,426,606	\$1,573,394	\$7,946	\$22,962,000	\$12,016,780	\$10,945,220	\$55,273	\$63,219	\$13,333	\$76,540	\$89,873	\$153,092
January 2031	\$4,000,000	\$2,439,939	\$1,560,061	\$7,878	\$22,962,000	\$12,093,320	\$10,868,680	\$54,887	\$62,765	\$13,333	\$76,540	\$89,873	\$152,638
February	\$4,000,000	\$2,453,272	\$1,546,728	\$7,811	\$22,962,000	\$12,169,860	\$10,792,140	\$54,500	\$62,311	\$13,333	\$76,540	\$89,873	\$152,184
March	\$4,000,000	\$2,466,605	\$1,533,395	\$7,744	\$22,962,000	\$12,246,400	\$10,715,600	\$54,114	\$61,858	\$13,333	\$76,540	\$89,873	\$151,731

Assumptions:	Landfill Cell construction costs	\$4,000,000
	Ash Transfer costs	\$22,962,000
	Annual Rate of Return on Rate Base	6.06%
	Monthly Rate of Return on Rate Base	0.505%

25 Year Amortization of Investment - Return on Rate Base

Month	Landfill Cell Component				Ash Transfer Component				Total Monthly Return	Monthly Amortization Expense			Combined Return and Expense
	Investment	Accumulated Amortization	Net Investment	Monthly Return on Rate Base	Investment	Accumulated Amortization	Net Investment	Monthly Return on Rate Base		Landfill Cell	Ash Transfer	Total Amortization Expense	
April	\$4,000,000	\$2,479,938	\$1,520,062	\$7,676	\$22,962,000	\$12,322,940	\$10,639,060	\$53,727	\$61,403	\$13,333	\$76,540	\$89,873	\$151,276
May	\$4,000,000	\$2,493,271	\$1,506,729	\$7,609	\$22,962,000	\$12,399,480	\$10,562,520	\$53,341	\$60,950	\$13,333	\$76,540	\$89,873	\$150,823
June	\$4,000,000	\$2,505,604	\$1,493,396	\$7,542	\$22,962,000	\$12,476,020	\$10,485,980	\$52,954	\$60,496	\$13,333	\$76,540	\$89,873	\$150,369
July	\$4,000,000	\$2,519,937	\$1,480,063	\$7,474	\$22,962,000	\$12,552,560	\$10,409,440	\$52,568	\$60,042	\$13,333	\$76,540	\$89,873	\$149,915
August	\$4,000,000	\$2,533,270	\$1,466,730	\$7,407	\$22,962,000	\$12,629,100	\$10,332,900	\$52,181	\$59,588	\$13,333	\$76,540	\$89,873	\$149,461
September	\$4,000,000	\$2,546,603	\$1,453,397	\$7,340	\$22,962,000	\$12,705,640	\$10,256,360	\$51,795	\$59,135	\$13,333	\$76,540	\$89,873	\$149,008
October	\$4,000,000	\$2,559,936	\$1,440,064	\$7,272	\$22,962,000	\$12,782,180	\$10,179,820	\$51,408	\$58,680	\$13,333	\$76,540	\$89,873	\$148,555
November	\$4,000,000	\$2,573,269	\$1,426,731	\$7,205	\$22,962,000	\$12,858,720	\$10,103,280	\$51,022	\$58,227	\$13,333	\$76,540	\$89,873	\$148,100
December 2031	\$4,000,000	\$2,586,602	\$1,413,398	\$7,138	\$22,962,000	\$12,935,260	\$10,026,740	\$50,635	\$57,773	\$13,333	\$76,540	\$89,873	\$147,646
January 2032	\$4,000,000	\$2,599,935	\$1,400,065	\$7,070	\$22,962,000	\$13,011,800	\$9,950,200	\$50,249	\$57,319	\$13,333	\$76,540	\$89,873	\$147,192
February	\$4,000,000	\$2,613,268	\$1,386,732	\$7,003	\$22,962,000	\$13,088,340	\$9,873,660	\$49,862	\$56,865	\$13,333	\$76,540	\$89,873	\$146,738
March	\$4,000,000	\$2,626,601	\$1,373,399	\$6,936	\$22,962,000	\$13,164,880	\$9,797,120	\$49,475	\$56,411	\$13,333	\$76,540	\$89,873	\$146,284
April	\$4,000,000	\$2,639,934	\$1,360,066	\$6,868	\$22,962,000	\$13,241,420	\$9,720,580	\$49,089	\$55,957	\$13,333	\$76,540	\$89,873	\$145,830
May	\$4,000,000	\$2,653,267	\$1,346,733	\$6,801	\$22,962,000	\$13,317,960	\$9,644,040	\$48,702	\$55,503	\$13,333	\$76,540	\$89,873	\$145,376
June	\$4,000,000	\$2,666,600	\$1,333,400	\$6,734	\$22,962,000	\$13,394,500	\$9,567,500	\$48,316	\$55,050	\$13,333	\$76,540	\$89,873	\$144,923
July	\$4,000,000	\$2,679,933	\$1,320,067	\$6,666	\$22,962,000	\$13,471,040	\$9,490,960	\$47,929	\$54,595	\$13,333	\$76,540	\$89,873	\$144,468
August	\$4,000,000	\$2,693,266	\$1,306,734	\$6,599	\$22,962,000	\$13,547,580	\$9,414,420	\$47,543	\$54,142	\$13,333	\$76,540	\$89,873	\$144,015
September	\$4,000,000	\$2,706,599	\$1,293,401	\$6,532	\$22,962,000	\$13,624,120	\$9,337,880	\$47,156	\$53,688	\$13,333	\$76,540	\$89,873	\$143,561
October	\$4,000,000	\$2,719,932	\$1,280,068	\$6,464	\$22,962,000	\$13,700,660	\$9,261,340	\$46,770	\$53,234	\$13,333	\$76,540	\$89,873	\$143,107
November	\$4,000,000	\$2,733,265	\$1,266,735	\$6,397	\$22,962,000	\$13,777,200	\$9,184,800	\$46,383	\$52,780	\$13,333	\$76,540	\$89,873	\$142,653
December 2032	\$4,000,000	\$2,746,598	\$1,253,402	\$6,330	\$22,962,000	\$13,853,740	\$9,108,260	\$45,997	\$52,327	\$13,333	\$76,540	\$89,873	\$142,200
January 2033	\$4,000,000	\$2,759,931	\$1,240,069	\$6,262	\$22,962,000	\$13,930,280	\$9,031,720	\$45,610	\$51,872	\$13,333	\$76,540	\$89,873	\$141,745
February	\$4,000,000	\$2,773,264	\$1,226,736	\$6,195	\$22,962,000	\$14,006,820	\$8,955,180	\$45,224	\$51,419	\$13,333	\$76,540	\$89,873	\$141,292
March	\$4,000,000	\$2,786,597	\$1,213,403	\$6,128	\$22,962,000	\$14,083,360	\$8,878,640	\$44,837	\$50,965	\$13,333	\$76,540	\$89,873	\$140,838
April	\$4,000,000	\$2,799,930	\$1,200,070	\$6,060	\$22,962,000	\$14,159,900	\$8,802,100	\$44,451	\$50,511	\$13,333	\$76,540	\$89,873	\$140,384
May	\$4,000,000	\$2,813,263	\$1,186,737	\$5,993	\$22,962,000	\$14,236,440	\$8,725,560	\$44,064	\$50,057	\$13,333	\$76,540	\$89,873	\$139,930
June	\$4,000,000	\$2,826,596	\$1,173,404	\$5,926	\$22,962,000	\$14,312,980	\$8,649,020	\$43,678	\$49,604	\$13,333	\$76,540	\$89,873	\$139,477
July	\$4,000,000	\$2,839,929	\$1,160,071	\$5,858	\$22,962,000	\$14,389,520	\$8,572,480	\$43,291	\$49,149	\$13,333	\$76,540	\$89,873	\$139,022
August	\$4,000,000	\$2,853,262	\$1,146,738	\$5,791	\$22,962,000	\$14,466,060	\$8,495,940	\$42,904	\$48,695	\$13,333	\$76,540	\$89,873	\$138,568
September	\$4,000,000	\$2,866,595	\$1,133,405	\$5,724	\$22,962,000	\$14,542,600	\$8,419,400	\$42,518	\$48,242	\$13,333	\$76,540	\$89,873	\$138,115
October	\$4,000,000	\$2,879,928	\$1,120,072	\$5,656	\$22,962,000	\$14,619,140	\$8,342,860	\$42,131	\$47,787	\$13,333	\$76,540	\$89,873	\$137,660
November	\$4,000,000	\$2,893,261	\$1,106,739	\$5,589	\$22,962,000	\$14,695,680	\$8,266,320	\$41,745	\$47,334	\$13,333	\$76,540	\$89,873	\$137,207
December 2033	\$4,000,000	\$2,906,594	\$1,093,406	\$5,522	\$22,962,000	\$14,772,220	\$8,189,780	\$41,358	\$46,880	\$13,333	\$76,540	\$89,873	\$136,753
January 2034	\$4,000,000	\$2,919,927	\$1,080,073	\$5,454	\$22,962,000	\$14,848,760	\$8,113,240	\$40,972	\$46,426	\$13,333	\$76,540	\$89,873	\$136,299
February	\$4,000,000	\$2,933,260	\$1,066,740	\$5,387	\$22,962,000	\$14,925,300	\$8,036,700	\$40,585	\$45,972	\$13,333	\$76,540	\$89,873	\$135,845
March	\$4,000,000	\$2,946,593	\$1,053,407	\$5,320	\$22,962,000	\$15,001,840	\$7,960,160	\$40,199	\$45,519	\$13,333	\$76,540	\$89,873	\$135,392
April	\$4,000,000	\$2,959,926	\$1,040,074	\$5,252	\$22,962,000	\$15,078,380	\$7,883,620	\$39,812	\$45,064	\$13,333	\$76,540	\$89,873	\$134,937
May	\$4,000,000	\$2,973,259	\$1,026,741	\$5,185	\$22,962,000	\$15,154,920	\$7,807,080	\$39,426	\$44,611	\$13,333	\$76,540	\$89,873	\$134,484
June	\$4,000,000	\$2,986,592	\$1,013,408	\$5,118	\$22,962,000	\$15,231,460	\$7,730,540	\$39,039	\$44,157	\$13,333	\$76,540	\$89,873	\$134,030
July	\$4,000,000	\$2,999,925	\$1,000,075	\$5,050	\$22,962,000	\$15,308,000	\$7,654,000	\$38,653	\$43,703	\$13,333	\$76,540	\$89,873	\$133,576
August	\$4,000,000	\$3,013,258	\$986,742	\$4,983	\$22,962,000	\$15,384,540	\$7,577,460	\$38,266	\$43,249	\$13,333	\$76,540	\$89,873	\$133,122
September	\$4,000,000	\$3,026,591	\$973,409	\$4,916	\$22,962,000	\$15,461,080	\$7,500,920	\$37,880	\$42,796	\$13,333	\$76,540	\$89,873	\$132,669
October	\$4,000,000	\$3,039,924	\$960,076	\$4,848	\$22,962,000	\$15,537,620	\$7,424,380	\$37,493	\$42,341	\$13,333	\$76,540	\$89,873	\$132,214
November	\$4,000,000	\$3,053,257	\$946,743	\$4,781	\$22,962,000	\$15,614,160	\$7,347,840	\$37,107	\$41,888	\$13,333	\$76,540	\$89,873	\$131,761
December 2034	\$4,000,000	\$3,066,590	\$933,410	\$4,714	\$22,962,000	\$15,690,700	\$7,271,300	\$36,720	\$41,434	\$13,333	\$76,540	\$89,873	\$131,307
January 2035	\$4,000,000	\$3,079,923	\$920,077	\$4,646	\$22,962,000	\$15,767,240	\$7,194,760	\$36,334	\$40,980	\$13,333	\$76,540	\$89,873	\$130,853
February	\$4,000,000	\$3,093,256	\$906,744	\$4,579	\$22,962,000	\$15,843,780	\$7,118,220	\$35,947	\$40,526	\$13,333	\$76,540	\$89,873	\$130,399
March	\$4,000,000	\$3,106,589	\$893,411	\$4,512	\$22,962,000	\$15,920,320	\$7,041,680	\$35,560	\$40,072	\$13,333	\$76,540	\$89,873	\$129,945
April	\$4,000,000	\$3,119,922	\$880,078	\$4,444	\$22,962,000	\$15,996,860	\$6,965,140	\$35,174	\$39,618	\$13,333	\$76,540	\$89,873	\$129,491
May	\$4,000,000	\$3,133,255	\$866,745	\$4,377	\$22,962,000	\$16,073,400	\$6,888,600	\$34,787	\$39,164	\$13,333	\$76,540	\$89,873	\$129,037
June	\$4,000,000	\$3,146,588	\$853,412	\$4,310	\$22,962,000	\$16,149,940	\$6,812,060	\$34,401	\$38,711	\$13,333	\$76,540	\$89,873	\$128,584
July	\$4,000,000	\$3,159,921	\$840,079	\$4,242	\$22,962,000	\$16,226,480	\$6,735,520	\$34,014	\$38,256	\$13,333	\$76,540	\$89,873	\$128,129
August	\$4,000,000	\$3,173,254	\$826,746	\$4,175	\$22,962,000	\$16,303,020	\$6,658,980	\$33,628	\$37,803	\$13,333	\$76,540	\$89,873	\$127,676
September	\$4,000,000	\$3,186,587	\$813,413	\$4,108	\$22,962,000	\$16,379,560	\$6,582,440	\$33,241	\$37,349	\$13,333	\$76,540	\$89,873	\$127,222
October	\$4,000,000	\$3,199,920	\$800,080	\$4,040	\$22,962,000	\$16,456,100	\$6,505,900	\$32,855	\$36,895	\$13,333	\$76,540	\$89,873	\$126,768
November	\$4,000,000	\$3,213,253	\$786,747	\$3,973	\$22,962,000	\$16,532,640	\$6,429,360	\$32,468	\$36,441	\$13,333	\$76,540	\$89,873	\$126,314
December 2035	\$4,000,000	\$3,226,586	\$773,414	\$3,906	\$22,962,000	\$16,609,180	\$6,352,820	\$32,082	\$35,988	\$13,333	\$76,540	\$89,873	\$125,860
January 2036	\$4,000,000	\$3,239,919	\$760,081	\$3,838	\$22,962,000	\$16,685,720	\$6,276,280	\$31,695	\$35,533	\$13,333	\$76,540	\$89,873	\$125,406
February	\$4,000,000	\$3,253,252	\$746,748	\$3,771	\$22,962,000	\$16,762,260	\$6,199,740	\$31,309	\$35,080	\$13,333	\$76,540	\$89,873	\$124,953
March	\$4,000,000	\$3,266,585	\$733,415	\$3,704	\$22,962,000	\$16,838,800	\$6,123,200	\$30,922	\$34,626	\$13,333	\$76,540	\$89,873	\$124,499
April	\$4,000,000	\$3,279,918	\$720,082	\$3,636	\$22,962,000	\$16,915,340	\$6,046,660	\$30,536	\$34,172	\$13,333	\$76,540	\$89,873	\$124,045
May	\$4,000,000	\$3,293,251	\$706,749	\$3,569	\$22,962,000	\$16,991,880	\$5,970,120	\$30,149	\$33,718	\$13,333	\$76,540	\$89,873	\$123,591
June	\$4,000,000	\$3,306,584	\$693,416	\$3,502	\$22,962,000	\$17,068,420	\$5,893,580	\$29,763	\$33,265	\$13,333	\$76,540	\$89,873	\$123,138
July	\$4,000,000	\$3,319,917	\$680,083	\$3,434	\$22,962,000	\$17,144,960	\$5,817,040	\$29,376	\$32,810	\$13,333	\$76,540	\$89,873	\$122,683

Assumptions:	Landfill Cell construction costs	\$4,000,000
	Ash Transfer costs	\$22,962,000
	Annual Rate of Return on Rate Base	6.06%
	Monthly Rate of Return on Rate Base	0.505%

25 Year Amortization of Investment - Return on Rate Base

Month	Landfill Cell Component				Ash Transfer Component				Total Monthly Return	Monthly Amortization Expense			Combined Return and Expense
	Investment	Accumulated Amortization	Net Investment	Monthly Return on Rate Base	Investment	Accumulated Amortization	Net Investment	Monthly Return on Rate Base		Landfill Cell	Ash Transfer	Total Amortization Expense	
August	\$4,000,000	\$3,333,250	\$666,750	\$3,367	\$22,962,000	\$17,221,500	\$5,740,500	\$28,990	\$32,357	\$13,333	\$76,540	\$89,873	\$122,230
September	\$4,000,000	\$3,346,583	\$653,417	\$3,300	\$22,962,000	\$17,298,040	\$5,663,960	\$28,603	\$31,903	\$13,333	\$76,540	\$89,873	\$121,776
October	\$4,000,000	\$3,359,916	\$640,084	\$3,232	\$22,962,000	\$17,374,580	\$5,587,420	\$28,216	\$31,448	\$13,333	\$76,540	\$89,873	\$121,321
November	\$4,000,000	\$3,373,249	\$626,751	\$3,165	\$22,962,000	\$17,451,120	\$5,510,880	\$27,830	\$30,995	\$13,333	\$76,540	\$89,873	\$120,868
December 2036	\$4,000,000	\$3,386,582	\$613,418	\$3,098	\$22,962,000	\$17,527,660	\$5,434,340	\$27,443	\$30,541	\$13,333	\$76,540	\$89,873	\$120,414
January 2037	\$4,000,000	\$3,399,915	\$600,085	\$3,030	\$22,962,000	\$17,604,200	\$5,357,800	\$27,057	\$30,087	\$13,333	\$76,540	\$89,873	\$119,960
February	\$4,000,000	\$3,413,248	\$586,752	\$2,963	\$22,962,000	\$17,680,740	\$5,281,260	\$26,670	\$29,633	\$13,333	\$76,540	\$89,873	\$119,506
March	\$4,000,000	\$3,426,581	\$573,419	\$2,896	\$22,962,000	\$17,757,280	\$5,204,720	\$26,284	\$29,180	\$13,333	\$76,540	\$89,873	\$119,053
April	\$4,000,000	\$3,439,914	\$560,086	\$2,828	\$22,962,000	\$17,833,820	\$5,128,180	\$25,897	\$28,725	\$13,333	\$76,540	\$89,873	\$118,598
May	\$4,000,000	\$3,453,247	\$546,753	\$2,761	\$22,962,000	\$17,910,360	\$5,051,640	\$25,511	\$28,272	\$13,333	\$76,540	\$89,873	\$118,145
June	\$4,000,000	\$3,466,580	\$533,420	\$2,694	\$22,962,000	\$17,986,900	\$4,975,100	\$25,124	\$27,818	\$13,333	\$76,540	\$89,873	\$117,691
July	\$4,000,000	\$3,479,913	\$520,087	\$2,626	\$22,962,000	\$18,063,440	\$4,898,560	\$24,738	\$27,364	\$13,333	\$76,540	\$89,873	\$117,237
August	\$4,000,000	\$3,493,246	\$506,754	\$2,559	\$22,962,000	\$18,139,980	\$4,822,020	\$24,351	\$26,910	\$13,333	\$76,540	\$89,873	\$116,783
September	\$4,000,000	\$3,506,579	\$493,421	\$2,492	\$22,962,000	\$18,216,520	\$4,745,480	\$23,965	\$26,457	\$13,333	\$76,540	\$89,873	\$116,330
October	\$4,000,000	\$3,519,912	\$480,088	\$2,424	\$22,962,000	\$18,293,060	\$4,668,940	\$23,578	\$26,002	\$13,333	\$76,540	\$89,873	\$115,875
November	\$4,000,000	\$3,533,245	\$466,755	\$2,357	\$22,962,000	\$18,369,600	\$4,592,400	\$23,192	\$25,549	\$13,333	\$76,540	\$89,873	\$115,422
December 2037	\$4,000,000	\$3,546,578	\$453,422	\$2,290	\$22,962,000	\$18,446,140	\$4,515,860	\$22,805	\$25,095	\$13,333	\$76,540	\$89,873	\$114,968
January 2038	\$4,000,000	\$3,559,911	\$440,089	\$2,222	\$22,962,000	\$18,522,680	\$4,439,320	\$22,419	\$24,641	\$13,333	\$76,540	\$89,873	\$114,514
February	\$4,000,000	\$3,573,244	\$426,756	\$2,155	\$22,962,000	\$18,599,220	\$4,362,780	\$22,032	\$24,187	\$13,333	\$76,540	\$89,873	\$114,060
March	\$4,000,000	\$3,586,577	\$413,423	\$2,088	\$22,962,000	\$18,675,760	\$4,286,240	\$21,646	\$23,734	\$13,333	\$76,540	\$89,873	\$113,607
April	\$4,000,000	\$3,599,910	\$400,090	\$2,020	\$22,962,000	\$18,752,300	\$4,209,700	\$21,259	\$23,279	\$13,333	\$76,540	\$89,873	\$113,152
May	\$4,000,000	\$3,613,243	\$386,757	\$1,953	\$22,962,000	\$18,828,840	\$4,133,160	\$20,872	\$22,825	\$13,333	\$76,540	\$89,873	\$112,698
June	\$4,000,000	\$3,626,576	\$373,424	\$1,886	\$22,962,000	\$18,905,380	\$4,056,620	\$20,486	\$22,372	\$13,333	\$76,540	\$89,873	\$112,245
July	\$4,000,000	\$3,639,909	\$360,091	\$1,818	\$22,962,000	\$18,981,920	\$3,980,080	\$20,099	\$21,917	\$13,333	\$76,540	\$89,873	\$111,790
August	\$4,000,000	\$3,653,242	\$346,758	\$1,751	\$22,962,000	\$19,058,460	\$3,903,540	\$19,713	\$21,464	\$13,333	\$76,540	\$89,873	\$111,337
September	\$4,000,000	\$3,666,575	\$333,425	\$1,684	\$22,962,000	\$19,135,000	\$3,827,000	\$19,326	\$21,010	\$13,333	\$76,540	\$89,873	\$110,883
October	\$4,000,000	\$3,679,908	\$320,092	\$1,616	\$22,962,000	\$19,211,540	\$3,750,460	\$18,940	\$20,556	\$13,333	\$76,540	\$89,873	\$110,429
November	\$4,000,000	\$3,693,241	\$306,759	\$1,549	\$22,962,000	\$19,288,080	\$3,673,920	\$18,553	\$20,102	\$13,333	\$76,540	\$89,873	\$109,975
December 2038	\$4,000,000	\$3,706,574	\$293,426	\$1,482	\$22,962,000	\$19,364,620	\$3,597,380	\$18,167	\$19,649	\$13,333	\$76,540	\$89,873	\$109,522
January 2039	\$4,000,000	\$3,719,907	\$280,093	\$1,414	\$22,962,000	\$19,441,160	\$3,520,840	\$17,780	\$19,194	\$13,333	\$76,540	\$89,873	\$109,067
February	\$4,000,000	\$3,733,240	\$266,760	\$1,347	\$22,962,000	\$19,517,700	\$3,444,300	\$17,394	\$18,741	\$13,333	\$76,540	\$89,873	\$108,614
March	\$4,000,000	\$3,746,573	\$253,427	\$1,280	\$22,962,000	\$19,594,240	\$3,367,760	\$17,007	\$18,287	\$13,333	\$76,540	\$89,873	\$108,160
April	\$4,000,000	\$3,759,906	\$240,094	\$1,212	\$22,962,000	\$19,670,780	\$3,291,220	\$16,621	\$17,833	\$13,333	\$76,540	\$89,873	\$107,706
May	\$4,000,000	\$3,773,239	\$226,761	\$1,145	\$22,962,000	\$19,747,320	\$3,214,680	\$16,234	\$17,379	\$13,333	\$76,540	\$89,873	\$107,252
June	\$4,000,000	\$3,786,572	\$213,428	\$1,078	\$22,962,000	\$19,823,860	\$3,138,140	\$15,848	\$16,926	\$13,333	\$76,540	\$89,873	\$106,799
July	\$4,000,000	\$3,799,905	\$200,095	\$1,010	\$22,962,000	\$19,900,400	\$3,061,600	\$15,461	\$16,471	\$13,333	\$76,540	\$89,873	\$106,344
August	\$4,000,000	\$3,813,238	\$186,762	\$943	\$22,962,000	\$19,976,940	\$2,985,060	\$15,075	\$16,018	\$13,333	\$76,540	\$89,873	\$105,891
September	\$4,000,000	\$3,826,571	\$173,429	\$876	\$22,962,000	\$20,053,480	\$2,908,520	\$14,688	\$15,564	\$13,333	\$76,540	\$89,873	\$105,437
October	\$4,000,000	\$3,839,904	\$160,096	\$808	\$22,962,000	\$20,130,020	\$2,831,980	\$14,301	\$15,109	\$13,333	\$76,540	\$89,873	\$104,982
November	\$4,000,000	\$3,853,237	\$146,763	\$741	\$22,962,000	\$20,206,560	\$2,755,440	\$13,915	\$14,656	\$13,333	\$76,540	\$89,873	\$104,529
December 2039	\$4,000,000	\$3,866,570	\$133,430	\$674	\$22,962,000	\$20,283,100	\$2,678,900	\$13,528	\$14,202	\$13,333	\$76,540	\$89,873	\$104,075
January 2040	\$4,000,000	\$3,879,903	\$120,097	\$606	\$22,962,000	\$20,359,640	\$2,602,360	\$13,142	\$13,748	\$13,333	\$76,540	\$89,873	\$103,621
February	\$4,000,000	\$3,893,236	\$106,764	\$539	\$22,962,000	\$20,436,180	\$2,525,820	\$12,755	\$13,294	\$13,333	\$76,540	\$89,873	\$103,167
March	\$4,000,000	\$3,906,569	\$93,431	\$472	\$22,962,000	\$20,512,720	\$2,449,280	\$12,369	\$12,841	\$13,333	\$76,540	\$89,873	\$102,714
April	\$4,000,000	\$3,919,902	\$80,098	\$404	\$22,962,000	\$20,589,260	\$2,372,740	\$11,982	\$12,386	\$13,333	\$76,540	\$89,873	\$102,259
May	\$4,000,000	\$3,933,235	\$66,765	\$337	\$22,962,000	\$20,665,800	\$2,296,200	\$11,596	\$11,933	\$13,333	\$76,540	\$89,873	\$101,806
June	\$4,000,000	\$3,946,568	\$53,432	\$270	\$22,962,000	\$20,742,340	\$2,219,660	\$11,209	\$11,479	\$13,333	\$76,540	\$89,873	\$101,352
July	\$4,000,000	\$3,959,901	\$40,099	\$202	\$22,962,000	\$20,818,880	\$2,143,120	\$10,823	\$11,025	\$13,333	\$76,540	\$89,873	\$100,898
August	\$4,000,000	\$3,973,234	\$26,766	\$135	\$22,962,000	\$20,895,420	\$2,066,580	\$10,436	\$10,571	\$13,333	\$76,540	\$89,873	\$100,444
September	\$4,000,000	\$3,986,567	\$13,433	\$68	\$22,962,000	\$20,971,960	\$1,990,040	\$10,050	\$10,118	\$13,333	\$76,540	\$89,873	\$99,991
October	\$4,000,000	\$3,999,900	\$0	\$1	\$22,962,000	\$21,048,500	\$1,913,500	\$9,663	\$9,663	\$13,333	\$76,540	\$89,873	\$99,537
November	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,125,040	\$1,836,960	\$9,277	\$9,277	\$10	\$76,540	\$76,640	\$85,917
December 2040	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,201,580	\$1,760,420	\$8,890	\$8,890	\$0	\$76,540	\$76,540	\$85,430
January 2041	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,278,120	\$1,683,880	\$8,504	\$8,504	\$0	\$76,540	\$76,540	\$84,944
February	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,354,660	\$1,607,340	\$8,117	\$8,117	\$0	\$76,540	\$76,540	\$84,457
March	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,431,200	\$1,530,800	\$7,731	\$7,731	\$0	\$76,540	\$76,540	\$83,971
April	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,507,740	\$1,454,260	\$7,344	\$7,344	\$0	\$76,540	\$76,540	\$83,484
May	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,584,280	\$1,377,720	\$6,957	\$6,957	\$0	\$76,540	\$76,540	\$83,000
June	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,660,820	\$1,301,180	\$6,571	\$6,571	\$0	\$76,540	\$76,540	\$82,514
July	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,737,360	\$1,224,640	\$6,184	\$6,184	\$0	\$76,540	\$76,540	\$82,028
August	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,813,900	\$1,148,100	\$5,798	\$5,798	\$0	\$76,540	\$76,540	\$81,542
September	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,890,440	\$1,071,560	\$5,411	\$5,411	\$0	\$76,540	\$76,540	\$81,056
October	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$21,966,980	\$995,020	\$5,025	\$5,025	\$0	\$76,540	\$76,540	\$80,570
November	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,043,520	\$918,480	\$4,638	\$4,638	\$0	\$76,540	\$76,540	\$80,084

Assumptions:	Landfill Cell construction costs	\$4,000,000
	Ash Transfer costs	\$22,962,000
	Annual Rate of Return on Rate Base	6.06%
	Monthly Rate of Return on Rate Base	0.505%

25 Year Amortization of Investment - Return on Rate Base

Month	Landfill Cell Component			Ash Transfer Component			Total Monthly Return	Monthly Amortization Expense			Combined Return and Expense		
	Investment	Accumulated Amortization	Net Investment	Investment	Accumulated Amortization	Net Investment		Landfill Cell	Ash Transfer	Total Amortization Expense			
December 2041	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,120,060	\$841,940	\$4,252	\$4,252	\$0	\$76,540	\$76,540	\$80,792
January 2042	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,196,600	\$765,400	\$3,865	\$3,865	\$0	\$76,540	\$76,540	\$80,405
February	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,273,140	\$688,860	\$3,479	\$3,479	\$0	\$76,540	\$76,540	\$80,019
March	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,349,680	\$612,320	\$3,092	\$3,092	\$0	\$76,540	\$76,540	\$79,632
April	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,426,220	\$535,780	\$2,706	\$2,706	\$0	\$76,540	\$76,540	\$79,246
May	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,502,760	\$459,240	\$2,319	\$2,319	\$0	\$76,540	\$76,540	\$78,859
June	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,579,300	\$382,700	\$1,933	\$1,933	\$0	\$76,540	\$76,540	\$78,473
July	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,655,840	\$306,160	\$1,546	\$1,546	\$0	\$76,540	\$76,540	\$78,086
August	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,732,380	\$229,620	\$1,160	\$1,160	\$0	\$76,540	\$76,540	\$77,700
September	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,808,920	\$153,080	\$773	\$773	\$0	\$76,540	\$76,540	\$77,313
October	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,885,460	\$76,540	\$387	\$387	\$0	\$76,540	\$76,540	\$76,927
November	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,962,000	\$0	\$0	\$0	\$0	\$76,540	\$76,540	\$76,540
December 2042	\$4,000,000	\$4,000,000	\$0	\$0	\$22,962,000	\$22,962,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Totals				\$3,090,668				\$18,904,399	\$21,995,067	\$4,000,000	\$22,962,000	\$26,962,000	\$48,957,067

Revised Exhibit ISS-4

**EAST KENTUCKY POWER COOPERATIVE
ESTIMATED COST RECOVERY IMPACT OF
SMITH SPECIAL WASTE LANDFILL**

Estimated Annual Revenue Requirements

	As Filed	15-Year Amortization	20-Year Amortization	25-Year Amortization
Capital Costs (Estimated Capital Cost)	\$26,962,000	\$26,962,000	\$26,962,000	\$26,962,000
Fixed Charge Rate	17.318%	13.985%	12.318%	11.318%
Estimated Annual Revenue Requirements	\$4,669,279	\$3,770,546	\$3,321,179	\$3,051,559

Derivation of Fixed Charge Rate

	Average Factor			
Interest (Proposed in Case No. 2014-00051)	4.042%	4.042%	4.042%	4.042%
TIER (Based on 1.50)	2.021%	2.021%	2.021%	2.021%
Amortization	10.000%	6.667%	5.000%	4.000%
Property Taxes	1.034%	1.034%	1.034%	1.034%
Property Insurance	0.124%	0.124%	0.124%	0.124%
Subtotal	17.221%	13.888%	12.221%	11.221%
Total O&M	0.097%	0.097%	0.097%	0.097%
Total Fixed Charge Rate	17.318%	13.985%	12.318%	11.318%

Revised Exhibit ISS-4

**EAST KENTUCKY POWER COOPERATIVE, INC.
ESTIMATED IMPACT ON RESIDENTIAL RATES
AS FILED - BASED ON 10-YEAR AMORTIZATION**

Estimated Annual Revenue Requirements

Capital Costs	\$26,962,000
Fixed Charge Rate	17.318%
Estimated Annual Revenue Requirements	<u>\$4,669,279</u>

Revenue Information as of December 31, 2013 Billings

Rate Schedule	Total Revenues	Base Rate and FAC Revenues	Environmental Surcharge	Allocation Percentage	Allocated Annual Revenue Require.
Rate E	\$708,346,262	\$613,789,467	\$94,556,795	80.565%	\$3,761,805
Rate B	\$61,667,636	\$53,441,795	\$8,225,841	7.014%	\$327,503
Rate C	\$22,269,638	\$19,294,942	\$2,974,696	2.533%	\$118,273
Rate G	\$23,819,270	\$20,622,636	\$3,196,634	2.707%	\$126,397
Inland Steam	\$13,618,254	\$11,774,749	\$1,843,505	1.546%	\$72,187
Gallatin	\$48,359,118	\$41,972,895	\$6,386,223	5.509%	\$257,231
Tenn Gas Pipeline	\$1,093,342	\$957,853	\$135,489	0.126%	\$5,883
Totals	<u>\$879,173,520</u>	<u>\$761,854,337</u>	<u>\$117,319,183</u>	100.000%	<u>\$4,669,279</u>

Note: Allocation Percentage is calculated off of Base Rate and FAC Revenues; Green Power is excluded.

Percentage Increase at Wholesale

Total Estimated Annual Revenue Requirement	\$4,669,279
Total Revenues as of December 31, 2012	\$879,173,520
Percentage Increase at Wholesale	0.53%

Percentage Increase at Retail

Based on historical billing information, the retail Environmental Surcharge has been approximately 72% of the wholesale Environmental Surcharge.

Percentage Increase at Wholesale	0.53%
Historic relationship between retail and wholesale	72.00%
Percentage Increase at Retail	0.38%

Impact on Average Residential Bill at Retail

Allocated Annual Revenue Requirement - Rate E	\$3,761,805
2013 billed kWh Sales - Rate E	9,659,751,000 kWh
Wholesale Rate E Revenue Requirement per kWh	\$0.00039
Average Residential Bill in kWh	1,200 kWh
Impact on Average Residential Bill at Wholesale	\$0.468
Historic relationship between retail and wholesale	72.00%
Impact on Average Residential Bill at Retail	\$0.34

Revised Exhibit ISS-4

**EAST KENTUCKY POWER COOPERATIVE, INC.
ESTIMATED IMPACT ON RESIDENTIAL RATES
BASED ON 15-YEAR AMORTIZATION**

Estimated Annual Revenue Requirements

Capital Costs	\$26,962,000
Fixed Charge Rate	13.985%
Estimated Annual Revenue Requirements	<u>\$3,770,546</u>

Revenue Information as of December 31, 2013 Billings

Rate Schedule	Total Revenues	Base Rate and FAC Revenues	Environmental Surcharge	Allocation Percentage	Allocated Annual Revenue Require.
Rate E	\$708,346,262	\$613,789,467	\$94,556,795	80.565%	\$3,037,740
Rate B	\$61,667,636	\$53,441,795	\$8,225,841	7.014%	\$264,466
Rate C	\$22,269,638	\$19,294,942	\$2,974,696	2.533%	\$95,508
Rate G	\$23,819,270	\$20,622,636	\$3,196,634	2.707%	\$102,069
Inland Steam	\$13,618,254	\$11,774,749	\$1,843,505	1.546%	\$58,293
Gallatin	\$48,359,118	\$41,972,895	\$6,386,223	5.509%	\$207,719
Tenn Gas Pipeline	\$1,093,342	\$957,853	\$135,489	0.126%	\$4,751
Totals	<u>\$879,173,520</u>	<u>\$761,854,337</u>	<u>\$117,319,183</u>	100.000%	<u>\$3,770,546</u>

Note: Allocation Percentage is calculated off of Base Rate and FAC Revenues; Green Power is excluded.

Percentage Increase at Wholesale

Total Estimated Annual Revenue Requirement	\$3,770,546
Total Revenues as of December 31, 2012	\$879,173,520
Percentage Increase at Wholesale	0.43%

Percentage Increase at Retail

Based on historical billing information, the retail Environmental Surcharge has been approximately 72% of the wholesale Environmental Surcharge.

Percentage Increase at Wholesale	0.43%
Historic relationship between retail and wholesale	72.00%
Percentage Increase at Retail	0.31%

Impact on Average Residential Bill at Retail

Allocated Annual Revenue Requirement - Rate E	\$3,037,740	
2013 billed kWh Sales - Rate E	9,659,751,000	kWh
Wholesale Rate E Revenue Requirement per kWh	\$0.00031	
Average Residential Bill in kWh	1,200	kWh
Impact on Average Residential Bill at Wholesale	\$0.372	
Historic relationship between retail and wholesale	72.00%	
Impact on Average Residential Bill at Retail	\$0.27	

Revised Exhibit ISS-4

**EAST KENTUCKY POWER COOPERATIVE, INC.
ESTIMATED IMPACT ON RESIDENTIAL RATES
BASED ON 20-YEAR AMORTIZATION**

Estimated Annual Revenue Requirements

Capital Costs	\$26,962,000
Fixed Charge Rate	12.318%
Estimated Annual Revenue Requirements	<u>\$3,321,179</u>

Revenue Information as of December 31, 2013 Billings

Rate Schedule	Total Revenues	Base Rate and FAC Revenues	Environmental Surcharge	Allocation Percentage	Allocated Annual Revenue Require.
Rate E	\$708,346,262	\$613,789,467	\$94,556,795	80.565%	\$2,675,708
Rate B	\$61,667,636	\$53,441,795	\$8,225,841	7.014%	\$232,947
Rate C	\$22,269,638	\$19,294,942	\$2,974,696	2.533%	\$84,125
Rate G	\$23,819,270	\$20,622,636	\$3,196,634	2.707%	\$89,904
Inland Steam	\$13,618,254	\$11,774,749	\$1,843,505	1.546%	\$51,345
Gallatin	\$48,359,118	\$41,972,895	\$6,386,223	5.509%	\$182,964
Tenn Gas Pipeline	\$1,093,342	\$957,853	\$135,489	0.126%	\$4,185
Totals	<u>\$879,173,520</u>	<u>\$761,854,337</u>	<u>\$117,319,183</u>	100.000%	<u>\$3,321,178</u>

Note: Allocation Percentage is calculated off of Base Rate and FAC Revenues; Green Power is excluded.

Percentage Increase at Wholesale

Total Estimated Annual Revenue Requirement	\$3,321,179
Total Revenues as of December 31, 2012	\$879,173,520
Percentage Increase at Wholesale	0.38%

Percentage Increase at Retail

Based on historical billing information, the retail Environmental Surcharge has been approximately 72% of the wholesale Environmental Surcharge.

Percentage Increase at Wholesale	0.38%
Historic relationship between retail and wholesale	72.00%
Percentage Increase at Retail	0.27%

Impact on Average Residential Bill at Retail

Allocated Annual Revenue Requirement - Rate E	\$2,675,708
2013 billed kWh Sales - Rate E	9,659,751,000 kWh
Wholesale Rate E Revenue Requirement per kWh	\$0.00028
Average Residential Bill in kWh	1,200 kWh
Impact on Average Residential Bill at Wholesale	\$0.336
Historic relationship between retail and wholesale	72.00%
Impact on Average Residential Bill at Retail	\$0.24

Revised Exhibit ISS-4

**EAST KENTUCKY POWER COOPERATIVE, INC.
ESTIMATED IMPACT ON RESIDENTIAL RATES
BASED ON 25-YEAR AMORTIZATION**

Estimated Annual Revenue Requirements

Capital Costs	\$26,962,000
Fixed Charge Rate	11.318%
Estimated Annual Revenue Requirements	<u>\$3,051,559</u>

Revenue Information as of December 31, 2013 Billings

Rate Schedule	Total Revenues	Base Rate and FAC Revenues	Environmental Surcharge	Allocation Percentage	Allocated Annual Revenue Require.
Rate E	\$708,346,262	\$613,789,467	\$94,556,795	80.565%	\$2,458,489
Rate B	\$61,667,636	\$53,441,795	\$8,225,841	7.014%	\$214,036
Rate C	\$22,269,638	\$19,294,942	\$2,974,696	2.533%	\$77,296
Rate G	\$23,819,270	\$20,622,636	\$3,196,634	2.707%	\$82,606
Inland Steam	\$13,618,254	\$11,774,749	\$1,843,505	1.546%	\$47,177
Gallatin	\$48,359,118	\$41,972,895	\$6,386,223	5.509%	\$168,110
Tenn Gas Pipeline	\$1,093,342	\$957,853	\$135,489	0.126%	\$3,845
Totals	<u>\$879,173,520</u>	<u>\$761,854,337</u>	<u>\$117,319,183</u>	<u>100.000%</u>	<u>\$3,051,559</u>

Note: Allocation Percentage is calculated off of Base Rate and FAC Revenues; Green Power is excluded.

Percentage Increase at Wholesale

Total Estimated Annual Revenue Requirement	\$3,051,559
Total Revenues as of December 31, 2012	\$879,173,520
Percentage Increase at Wholesale	0.35%

Percentage Increase at Retail

Based on historical billing information, the retail Environmental Surcharge has been approximately 72% of the wholesale Environmental Surcharge.

Percentage Increase at Wholesale	0.35%
Historic relationship between retail and wholesale	72.00%
Percentage Increase at Retail	0.25%

Impact on Average Residential Bill at Retail

Allocated Annual Revenue Requirement - Rate E	\$2,458,489
2013 billed kWh Sales - Rate E	9,659,751,000 kWh
Wholesale Rate E Revenue Requirement per kWh	\$0.00025
Average Residential Bill in kWh	1,200 kWh
Impact on Average Residential Bill at Wholesale	\$0.300
Historic relationship between retail and wholesale	72.00%
Impact on Average Residential Bill at Retail	\$0.22

Calculations and Supporting Documentation for Components of the Fixed Charge Rate

Property Taxes

Property Tax component was based on the rate currently charged in Mason County for the Spurlock landfill. That landfill is subject to both Mason County and City of Maysville real estate taxes. The combined property tax rate was used as a representative rate for estimate purposes as it is currently used for monthly surcharge calculations.

From Mason County Tax Bill (see attached bill) -

Total Real Estate Tax Due	\$2,337,618.29	
Assessed Value for Real Estate	\$267,462,047.00	
Combined Real Estate Rate per \$100 Value		0.874%

From Maysville Tax Bill (see attached bill) -

Total Real Estate Tax Due	\$427,840.14	
Assessed Value for Real Estate	\$267,400,088.00	
Real Estate Rate		0.160%
Combined Real Estate Property Tax Rate		1.034%

Property Insurance

The annual Property Insurance rate was determined by first calculating the ratio of the Net Book Value of all environmental surcharge projects to the Net Book Value of all insured assets. The calculation is performed as of December 31 of each year. The total annual property insurance premium is multiplied by this ratio to determine the annual premium allocated to environmental surcharge projects. To determine the fixed charge rate, the annual premium allocated to environmental surcharge projects is divided by the total Net Book Value of the environmental surcharge projects.

Environmental Surcharge Projects -

Project No. 1	Gilbert	\$53,756,143
Project No. 2	Spurlock 1 Precipitator	\$16,463,277
Project No. 3	Spurlock 1 SCR	\$54,909,386
Project No. 4	Spurlock 2 - SCR	\$27,521,706
Project No. 5	Dale 1 & 2 - Low NOx Burners	\$935,491
Project No. 6	Spurlock 1 - Low NOx Burners	\$2,661,695
Project No. 7	Spurlock 2 - Scrubber	\$176,532,666
Project No. 8	Spurlock 1 - Scrubber	\$130,425,043
Project No. 9	Spurlock 4	\$85,647,588
Project No. 10	Spurlock, Cooper & Dale: CEM	\$1,473,274
Project No. 11	Cooper 2 - Air Quality Control System	\$205,930,943
Project No. 12	Spurlock - Landfill Area C Expansion	\$6,046,319
Project No. 13	Spurlock 2 - Replace Ductwork	\$2,562,466
Total Net Book Value as of December 31, 2013		<u>\$764,865,997</u>
Total Net Book Value of All Insured Assets as of December 31, 2013		<u>\$2,670,840,647</u>
Ratio of NBV of Environmental Surcharge Projects to All Insured Assets		<u>28.64%</u>

Annual Property Insurance Premium -		
FM Global	[REDACTED]	[REDACTED]
FM Global	[REDACTED]	[REDACTED]
FM Global	[REDACTED]	[REDACTED]
Marsh USA, Inc.	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Total Annual Property Insurance Premium		\$3,309,205
Total Annual Premium allocated to Environmental Surcharge Projects		\$947,679
Total Net Book Value of Environmental Surcharge Projects		\$764,865,997
Property Insurance Cost Rate		0.124%

O&M Factor

The first year's estimated O&M expenses were divided by the total capital costs for the project to determine the O&M factor included in the Fixed Charge Rate.

First Year Estimated O&M Expense	\$26,132
Total Project Capital Costs	\$26,962,000
O&M Factor	0.097%

8:59 AM
 Department of Health of Kentucky
 DEPARTMENT OF REVENUE

Mason County Sheriff FAX No. 606-564-8676
 PUBLIC SERVICE COMPANY
 PROPERTY TAX STATEMENT
 For County, School or Special Taxes
 Assessment for Year 2013 Taxes

PSC Request 30
 P. 00 Page 30 of 35

BILL NO:
 GNC NO: 5735
 DATE 10/03/2013
 TYPE: RECC

Return Tax Payment to Sheriff
 PATRICK BOGGS
 MASON COUNTY
 P O BOX 502
 MAYSVILLE KY 41056
 County Clerk STEPHANIE G SCHUMACHER
 Telephone 606-564-3341

Taxpayer Name: EAST KENTUCKY POWER COOP INC
 ATTN:
 Address: ATT: DANA COX
 P O BOX 707
 WINCHESTER KY 40392 0707

364822
 859-744-6008

Name of District	Assessed Value	Real Estate Rate Per \$100 Value	Multi-pplier	Assessed Value	Tangible Rate Per \$100 Value	Multi-pplier	Total Real and Tangible Tax Due
REAL ESTATE	CEXT	267,462,047.00	0.0400	106,984.82	0.0400		106,984.82
REAL ESTATE	CNTY	267,462,047.00	0.2180	583,067.26	0.2450		583,067.26
REAL ESTATE	HLTH	267,462,047.00	0.0800	213,969.64	0.0800		213,969.64
REAL ESTATE	LIB	267,462,047.00	0.0670	179,199.57	0.0973		179,199.57
REAL ESTATE	SCHL	267,462,047.00	0.4690	1,254,397.00	0.4690		1,254,397.00
TANGIBLE	CEXT		0.0400	27,970,926.00	0.0400	11,188.37	11,188.37
TANGIBLE	CNTY		0.2180	27,970,926.00	0.2450	68,528.77	68,528.77
TANGIBLE	HLTH		0.0800	27,970,926.00	0.0800	22,378.74	22,378.74
TANGIBLE	LIB		0.0670	27,970,926.00	0.0973	27,215.71	27,215.71
TANGIBLE	SCHL		0.4690	27,970,926.00	0.4690	131,183.64	131,183.64

sum of taxes above:
 .874

Signed Stephanie G Schumacher, cc
 County Clerk

Total Due: 2,598,111.62

Received 10/4/13
 Computation Da
 Approved 10/10/13
 please pay by 10/25/13

10/1/14
12/24/14
6/1/14



EAST KENTUCKY POWER COOPERATIVE

ACCOUNT MANAGER: KELLEY MOLNAR
OFFICE: CLIENT SERVICE CLEVELAND
DATE: 28-MAY-2014

POLICY: ND466
ACCOUNT: 1-55207
REFERENCE: PD-49260

End. No.	Transaction	Charges	Credits
000	[REDACTED]	[REDACTED]	
000	[REDACTED]	[REDACTED]	
000	[REDACTED]		[REDACTED]
		[REDACTED]	[REDACTED]

Adjustments, if needed, will be made on a subsequent invoice. Unless specifically stated, this invoice does not include separately issued, provincial, or municipal taxes and charges.

Payment is due upon receipt of all the state coverage taglines, whichever is later. Policies will be subject to cancellation for non-payment of premium bills.

(Please include Policy No., Reference No. and Account No. on your remittance)

Please remit in US Funds to:

Factory Mutual Insurance Company
75 Roxlindale Drive Suite 0374
Chicago, IL 60675-8174

EFT Instructions - Wire & ACH (GCO, CTX)

US Funds
Northern Trust
30 South LaSalle
Chicago, IL 60676

For Credit to Factory Mutual Insurance Company
Account No. 62507
ABA No. 071000152
Swift Code CNCRUS44

UP 6/3/14
NIN
[Signature]

US Funds



EAST KENTUCKY POWER COOPERATIVE

ACCOUNT MANAGER: KELLEY MOLMAR

POLICY: ND400

OFFICE: CLIENT SERVICE CLEVELAND

ACCOUNT: 1-50397

DATE: 25-JUN-2014

REFERENCE: PD-00333

Empl. No.	Transaction	Charges	Credits
000	[REDACTED]	[REDACTED]	
000	[REDACTED]	[REDACTED]	

Adjustments, if needed, will be made on a subsequent invoice. Unless specifically stated, this invoice does not include applicable state, provincial, or municipal taxes and charges.

Payment is due upon receipt or on the date coverage begins, whichever is later. Policies will be subject to cancellation for non-payment of premium bills.

(Please include Policy No., Reference No. and Account No. on your remittance)

Please remit in US Funds to:

Factory Mutual Insurance Company
75 Remittance Drive Suite# 3174
Chicago, IL 60675-0174

EFT Instructions - Wires & ACH (CCP+, CTX)

US Funds
Northern Trust
50 South LaSalle
Chicago, IL 60675

For Credit to Factory Mutual Insurance Company
Account No. 52507
ABA No. 071000152
Swift Code CHORUS44

US Funds



Marsh USA Inc.
Louisville KY
(502) 217-8400

INVOICE

Page	2 of 2
Invoice Total	[REDACTED]
Invoice No.	310130759482
Invoice Date	08/16/2014
Effective Date	08/16/2014
Client No.	3101300000
Installment No.	3 of 4

East Kentucky Power Cooperative, Inc.
4775 Lexington Rd
Winchester, KY 40391-0709

Original
Policy Holder: East Kentucky Power Cooperative, Inc.
Billing Effective Date: 10/10/2014



Insurer	Policy No / Project No.	Expiration Date	Description/Type of Coverage	Item	Amount
	[REDACTED]	08/16/2014	[REDACTED]	FEE	[REDACTED]
Invoice Total					[REDACTED]

Marsh earns and retains interest income on premium payments held by Marsh on behalf of insurers during the period between receipt of such payments from clients and the time such payments are remitted to the applicable insurer, when generated by any.