

Ronald M. Sullivan

Jesse T. Mountjoy

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James M. Miller

Michael A. Fiorella

R. Michael Sullivan

Bryan R. Reynolds*

Tyson A. Kamuf

Mark W. Starnes

C. Ellsworth Mountjoy

John S. Wathen

November 4, 2015

Via Federal Express

Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard, P.O. Box 615
Frankfort, Kentucky 40602-0615

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NOV 05 2015

PUBLIC SERVICE
COMMISSION

*Also Licensed in Indiana

Re: *Application of Big Rivers Electric Corporation for Authority
to Establish Regulatory Assets for Expenses Related to the
Coal Combustion Residuals Rule;*
Case No. 2015-00333

Dear Mr. Derouen:

Enclosed for filing are an original and ten (10) copies of Big Rivers Electric Corporation's responses to the Public Service Commission Staff's initial request for information in the above-referenced matter. I certify that on this date, a copy of this letter and a copy of the responses were served on all parties of record.

Sincerely,



Tyson Kamuf
Counsel for Big Rivers Electric Corporation

TAK/lm
Enclosures

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Owensboro, Kentucky
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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC)
CORPORATION FOR AUTHORITY TO)
ESTABLISH REGULATORY ASSETS FOR)
EXPENSES RELATED TO THE COAL)
COMBUSTION RESIDUALS RULE)

Case No.
2015-00333

Responses to Commission Staff's Initial Request for Information
dated
October 26, 2015

FILED: November 5, 2015

ORIGINAL

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR AUTHORITY TO ESTABLISH REGULATORY ASSETS
FOR EXPENSES RELATED TO
THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

VERIFICATION

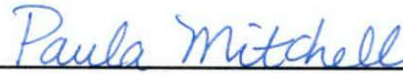
I, Eric M. Robeson, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Eric M. Robeson

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

4th SUBSCRIBED AND SWORN TO before me by Eric M. Robeson on this the
day of November, 2015.



Notary Public, Kentucky State at Large

My Commission Expires

1-12-17

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF
BIG RIVERS ELECTRIC CORPORATION
FOR AUTHORITY TO ESTABLISH REGULATORY ASSETS
FOR EXPENSES RELATED TO
THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

VERIFICATION

I, Nicholas R. (Nick) Castlen, verify, state, and affirm that the data request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Nicholas R. (Nick) Castlen

COMMONWEALTH OF KENTUCKY)
COUNTY OF HENDERSON)

SUBSCRIBED AND SWORN TO before me by Nicholas R. (Nick) Castlen on this the 4th day of November, 2015.



Notary Public, Kentucky State at Large

My Commission Expires

1-12-17

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

- 1 **Item 1)** *Refer to the Application, paragraph 5.*
2
3 *a. Explain when Big Rivers expects that it will have to close*
4 *the ash ponds for the Green Station ("Green") and City of*
5 *Henderson's Station Two ("Station Two").*
6 *b. Explain why there are no coal-combustion residual*
7 *("CCR")-related future liabilities for ash ponds at the*
8 *Coleman Station.*
9 *c. Provide the number and size of the ash ponds located at*
10 *the Coleman Station.*
11 *d. Explain whether Big Rivers expects that it will have to*
12 *close the ash ponds located at the Coleman Station, and*
13 *whether Big Rivers has developed a plan to address their*
14 *closure.*

15
16 **Response)**

- 17 a. Under the CCR regulations, Big Rivers must install ground
18 water monitoring wells around the ash ponds. If sampling
19 shows a significant impact to the ground water, then Big Rivers
20 must discontinue using the ponds and begin closure. Until the
21 sampling actually begins, however, Big Rivers will not know if
22 the ash ponds will have to be closed prior to the expiration of
23 their remaining lives as a result of ground water impact.
24 Therefore, Big Rivers' application in this matter utilized an

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 expected closure dated that was based on the remaining lives as
2 determined by the most recent depreciation study.

3 After Big Rivers prepared its application in this matter,
4 the EPA released a pre-publication version of the Effluent Limit
5 Guidelines for Steam Electric Power ("ELG"). Big Rivers
6 expects that these regulations will be published in the Federal
7 Register in official format sometime in November. The final
8 version of these regulations differed from the proposed
9 regulations in that the proposed regulations exempted power
10 plants less than 400 MW from certain requirements but the
11 final regulations do not contain that exemption. The ELG rule
12 includes a final date of operation of December 31, 2023. As a
13 result, Big Rivers now believes it must close the Green and
14 Station Two ash ponds by December 31, 2023.

15 b. The federal CCR regulations only apply to units that were
16 generating electricity on or after the effective date of the
17 regulations. Since Coleman has been idled since before that
18 date, the CCR rule does not apply.

19 c. There are three ash ponds at Coleman Station. The first ash
20 pond is between Coleman Station and Century Aluminum and is
21 approximately ninety-two acres. The second ash pond is on the
22 north side of the plant and is approximately forty-eight acres.
23 The third ash pond is located approximately 0.5 miles north of
24 the Station and is approximately eighty-eight acres.

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 d. At this time, Big Rivers does not believe a legal obligation exists
2 that would require the closure of the Coleman ash ponds given
3 its current idled state. As stated in the response to Item 1.b,
4 above, the federal CCR regulations do not apply to Coleman at
5 this time. In addition, Big Rivers maintains a current Kentucky
6 Pollutant Discharge Elimination System ("KPDES") permit for
7 all three of the Coleman ponds which allows continued operation
8 as a pond. The state has visited Coleman in the last two weeks
9 as part of its KPDES permit renewal process.

10 Big Rivers has taken initial steps to determine the
11 quantity and type of soils located on Big Rivers' property that
12 could be used to cover the Coleman ash ponds under the CCR
13 regulations in the event Coleman is returned to service and the
14 CCR regulations become applicable.

15
16
17 **Witness)** Eric M. Robeson

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

- 1 **Item 2)** ***Refer to the Application, paragraph 9.***
2
3 ***a. Provide the journal entries Big Rivers made to record its***
4 ***Asset Retirement Obligation ("ARO") liabilities for Green***
5 ***and Station Two.***
6 ***b. Provide the basis for Big Rivers' determination that the***
7 ***estimated costs to close the Green and Station Two ash***
8 ***ponds would be \$8.233 million and \$5.134 million,***
9 ***respectively.***
10 ***c. Provide a breakdown of the projected costs to close the ash***
11 ***ponds at Green and Station Two.***
12 ***d. For purposes of estimating Big Rivers' share of the Station***
13 ***Two ash pond closure costs, what was the split assumed by***
14 ***Big Rivers to be its share of those costs?***
15 ***e. Provide the calculation of the projected 2015 ARO-related***
16 ***depreciation expense of \$0.169 million by station.***
17 ***f. Provide the calculation of the projected 2015 ARO-related***
18 ***accretion expense of \$0.154 million by station.***
19 ***g. What are the remaining lives of Green and Station Two?***
20
21 **Response)**
22 **a. Big Rivers plans to make the initial journal entries to record its**
23 **ARO liabilities for the Green and Station Two ash ponds, and**

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333

Response to Commission Staff's Initial Request for Information
dated October 26, 2015

November 5, 2015

1 recognize the related depreciation and accretion expense for the
2 months of May 2015 through December 2015, during its
3 December 2015 month-end accounting close process. Please see
4 Attachment No. 1 to this response for a summary of the journal
5 entries to be recorded by Big Rivers during its December 2015
6 month-end accounting close process to account for the ARO
7 liabilities.

- 8 b. A study of Big Rivers' obligations related to the eventual
9 closures of its ash ponds was performed by Burns & McDonnell
10 Engineering Co., Inc. ("Burns & McDonnell") which provided
11 estimates of the current ash pond closure costs, in today's
12 dollars, to be \$4.653 million for the Green ash pond and \$3.346
13 million for Big Rivers' share of the Station Two ash pond.

14 The Rural Utilities Service Uniform System of Accounts
15 ("RUS USoA") and the Financial Accounting Standards Board
16 Accounting Standards Codification ("ASC") Topic 410-20, Asset
17 Retirement Obligations, require AROs to be recognized at their
18 present fair value in the period in which the obligation was
19 incurred. Using the current cost estimates provided in the
20 Burns & McDonnell study, the estimated retirement dates of the
21 respective units per Big Rivers' most recently approved
22 depreciation study (May 2039 for Green and May 2033 for

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333

Response to Commission Staff's Initial Request for Information
dated October 26, 2015

November 5, 2015

1 Station Two¹), and an annual inflation rate of 2.38%², Big Rivers
2 calculated the estimated future value of the costs to close the
3 ash ponds to be \$8.233 million for Green and \$5.134 million for
4 its share of Station Two, as provided in the application. Big
5 Rivers then discounted the projected future costs of the AROs,
6 using a discount rate of 4.30%³, to calculate the present fair
7 values as of May 31, 2015, to be \$2.939 million for the Green ash
8 pond and \$2.371 million for its share of the Station Two ash
9 pond. These present values were then used to determine the
10 initial amount to be recognized for the ARO liabilities as well as
11 the related depreciation and accretion amounts provided in Big
12 Rivers' application. Please see Attachments No. 2 and No. 3 to
13 this response for detailed calculations of the ARO-related
14 amounts provided in Big Rivers' application for the Green and
15 Station Two ash ponds, respectively.

16

¹ Big Rivers' most recent depreciation study, dated November 2012 (the "2012 Depreciation Study"), was approved by order of the Commission dated April 25, 2014, in Case No. 2013-00199. The remaining useful lives used to calculate the future costs and present fair values of the AROs provided in Big Rivers' application were 24 years for Green and 18 years for Station Two. The estimates were based on the average remaining useful lives provided for the respective units in scenarios 1 and 2 of Big Rivers' 2012 Depreciation Study.

² The annual inflation rate of 2.38% is based on the historical U.S. average annual inflation rate during the preceding 20-year period (1995 – 2014). See Attachment No. 7 for support and calculation of the annual inflation rate used.

³ The discount rate of 4.30% is based on the effective interest rate of Big Rivers' Series 2012A CoBank Note maturing in June 2032.

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 As described above, the original ARO-related amounts
2 provided in the application were calculated based on the
3 previously expected closure dates for the ash ponds of May 2039
4 for Green and May 2033 for Station Two. Subsequent to the
5 preparation of Big Rivers' application in this matter, the EPA
6 released a pre-publication version of the Effluent Limitation
7 Guidelines for Steam Electric Power (ELG). (Refer to the
8 response to Item 1a.) The ELG rule includes a final date of
9 operation for the ash ponds of December 31, 2023. Accordingly,
10 Big Rivers has revised its calculations of the ARO-related
11 amounts since the filing of its application in this case to account
12 for the change in the expected closure dates of the ash ponds.

13 Based on the revised calculations, which use December
14 31, 2023, as the expected closure date for both ash ponds and an
15 annual inflation rate of 2.38% (see Attachment No. 7), the future
16 values of the projected costs are now \$5.718 million for the
17 Green ash pond and \$4.112 million for Big Rivers' share of the
18 Station Two ash pond. Using the same discount rate of 4.30%
19 used for the amounts provided in the application, Big Rivers
20 calculated the revised present fair values of the ARO liabilities
21 as of May 31, 2015, for financial accounting purposes and initial
22 recognition of the ARO liabilities, to be \$3.942 million for the
23 Green ash pond and \$2.835 million for Big Rivers' share of the

**Case No. 2015-00333
Response to PSC 1-2**

**Witnesses: Nicholas R. Castlen (*all except c.*) and
Eric M. Robeson (*c. only*)**

Page 4 of 13

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333

Response to Commission Staff's Initial Request for Information
dated October 26, 2015

November 5, 2015

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Station Two ash pond. Please see Attachments No. 4 and No. 5 to this response for detailed calculations of the revised ARO-related amounts, based on the current expected closure date for both ash ponds of December 2023, for Green and Station Two, respectively. Also see Attachment No. 8 for a summary of the revised ARO related amounts and a comparison to the original ARO amounts provided in Big Rivers' application.

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR AUTHORITY TO ESTABLISH REGULATORY ASSETS FOR EXPENSES RELATED TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

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c.

Big Rivers Electric Corporation Capital Cost Estimate for Closure of Sebree Reid/HMP&L Ash Pond				
Reid/HMP&L Pond Cap in Place	Quantity	Unit	Unit Price	Price
General				
Mobilization/Demobilization	1	LS	\$100,000	\$ 100,000
Demo Piping	490	LF	\$27.00	13,230
Subtotal				\$ 113,230
Dewatering/Grading				
Dewatering/Pumping	60	DAYS	\$1,250	\$ 75,000
Ash Grading for Dewatering	1,010,500	SF	\$0.27	268,400
Subtotal				\$ 343,400
Cap in Place				
Rough Grading	10.1	100,000SF	\$5,250	\$ 53,100
Finish Grading	112,300	SY	\$0.21	23,600
40-mil LLDPE Geomembrane*	1,010,500	SF	\$0.60	606,300
18" Infiltration Layer – Borrow/Loading/Spreading	56,200	CY	\$14.70	826,200
18" Infiltration Layer – Hauling w/i 5 miles of Sebree**	56,200	CY	\$4.06	228,200
6" Topsoil – Borrow/Loading/Spreading	18,800	CY	\$28.00	526,400
6" Topsoil – Hauling w/i 5 miles of Sebree**	18,800	CY	\$4.06	76,400
Seeding	24	ACRE	\$2,500	60,000
Subtotal				\$ 2,400,200
Quality Assurance/Quality Control				
Quality Assurance/Quality Control	24	ACRE	\$10,000	\$ 240,000
Subtotal				\$ 240,000
Total Construction and QA/QC (Only)				\$ 3,097,000
Contingency (30%)				\$ 929,100
Engineering (5%)				154,900
Total Cost				\$ 4,181,000

2

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1

**Big Rivers Electric Corporation
Capital Cost Estimate for Closure of Sebree Reid/HMP&L Ash Pond
(continued)**

Notes:

- * Geomembrane may not be required if the final cover system meets the permeability requirements of the rule. If the permeability requirements are met, the capital cost could decrease by up to \$880,000.
- ** This estimate assumes the borrow source will be within 5 miles of Sebree. If the borrow source is found up to 25 miles of Sebree, the capital cost could increase by up to \$740,000.

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BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR AUTHORITY TO ESTABLISH REGULATORY ASSETS FOR EXPENSES RELATED TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

**Big Rivers Electric Corporation
Capital Cost Estimate for Closure of Sebree Green Ash Pond**

Green Pond Cap in Place	Quantity	Unit	Unit Price	Price
General				
Mobilization/Demobilization	1	LS	\$100,000	\$ 100,000
Pump Structure Demo	1	LS	\$100,000	100,000
Subtotal				<u>\$ 200,000</u>
Dewatering/Grading				
Dewatering/Pumping	60	DAYS	\$1,250	\$ 75,000
Ash Grading for Dewatering	1,083,600	SF	\$0.27	287,800
Subtotal				<u>\$ 362,800</u>
Cap in Place				
Rough Grading	10.8	100,000SF	\$5,250	\$ 56,900
Finish Grading	120,400	SY	\$0.21	25,300
40-mil LLDPE Geomembrane*	1,083,600	SF	\$0.60	650,200
18" Infiltration Layer – Borrow/Loading/Spreading	60,200	CY	\$14.70	885,000
18" Infiltration Layer – Hauling w/i 5 miles of Sebree**	60,200	CY	\$4.06	244,500
6" Topsoil – Borrow/Loading/Spreading	20,100	CY	\$28.00	562,800
6" Topsoil – Hauling w/i 5 miles of Sebree**	20,100	CY	\$4.06	81,700
Seeding	25	ACRE	\$2,500	62,500
Subtotal				<u>\$ 2,568,900</u>
Quality Assurance/Quality Control				
Quality Assurance/Quality Control	25	ACRE	\$10,000	\$ 250,000
Subtotal				<u>\$ 250,000</u>
Total Construction and QA/QC (Only)				\$ 3,382,000
Contingency (30%)				\$ 1,014,600
Engineering (5%)				169,100
Total Cost				<u>\$ 4,565,700</u>

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BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

**Big Rivers Electric Corporation
Capital Cost Estimate for Closure of Sebree Green Ash Pond
(continued)**

Notes:

- * Geomembrane may not be required if the final cover system meets the permeability requirements of the rule. If the permeability requirements are met, the capital cost could decrease by up to \$880,000.
- ** This estimate assumes the borrow source will be within 5 miles of Sebree. If the borrow source is found up to 25 miles of Sebree, the capital cost could increase by up to \$740,000.

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BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR AUTHORITY TO ESTABLISH REGULATORY ASSETS FOR EXPENSES RELATED TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

- 1 d. Section 8 of the Amendments to Contracts Among City of
2 Henderson, Kentucky, City of Henderson Utility Commission,
3 and Big Rivers, dated May 1, 1993, states that “the parties shall
4 bear decommissioning costs of Station Two in the proportions in
5 which they shared capacity costs during the life of Station Two.”
6 Accordingly, Big Rivers calculated its share of the Station Two
7 ash pond closure costs by multiplying the total estimated ash
8 pond closure costs for Station Two by Big Rivers' percentage of
9 Station Two's total capacity allocated to Big Rivers from June 1,
10 1973, through May 31, 2016 (the end of the City's current fiscal
11 year). See Attachment No. 6 to this response for the detailed
12 calculations used to estimate Big Rivers' share of the Station
13 Two ash pond closure costs.
- 14 e. As discussed in the response to Item 2.b, above, the calculations
15 used to determine the ARO-related amounts provided in Big
16 Rivers' application, including the 2015 ARO-related depreciation
17 expense of \$0.169 million, were revised to account for the change
18 in the estimated closure dates of the ash ponds due to the
19 recently issued ELG rule. The calculations of the ARO-related
20 depreciation expense for the Green and Station Two ash ponds,
21 provided in the application, are included in Attachments No. 2
22 and No. 3 to this response, respectively. The total 2015 ARO-
23 related depreciation expense of \$0.169 million, provided in the

**Case No. 2015-00333
Response to PSC 1-2**

**Witnesses: Nicholas R. Castlen (*all except c.*) and
Eric M. Robeson (*c. only*)**

Page 10 of 13

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 application, is equal to the sum of the 2015 Green ARO-related
2 depreciation expense of \$0.081 million (shown in Attachment
3 No. 2) and the 2015 Station Two ARO-related depreciation
4 expense of \$0.088 million (shown in Attachment No. 3).

5 The revised ARO-related depreciation expense for 2015,
6 based on the current expected closure date of December 2023 for
7 both ash ponds, is \$0.521 million, consisting of \$0.303 million
8 related to Green and \$0.218 million related to Station Two. The
9 revised calculations of the ARO-related depreciation amounts for
10 the Green and Station Two ash ponds are included in
11 Attachments No. 4 and No. 5 to this response, respectively.
12 Attachment No. 8 includes a comparison of the revised ARO
13 related calculations and the original ARO related calculations
14 provided in the application.

15 f. As discussed in the responses to Items 2.b and e above, the
16 calculations used to determine the ARO-related amounts
17 provided in Big Rivers' application, including the 2015 ARO-
18 related accretion expense of \$0.154 million, were revised to
19 account for the change in the estimated closure dates of the ash
20 ponds due to the recently issued ELG rule. The calculations of
21 the ARO-related accretion expense for the Green and Station
22 Two ash ponds, provided in the application, are included in
23 Attachments No. 2 and No. 3 to this response, respectively. The

**Case No. 2015-00333
Response to PSC 1-2**

**Witnesses: Nicholas R. Castlen (*all except c.*) and
Eric M. Robeson (*c. only*)**

Page 11 of 13

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR AUTHORITY TO ESTABLISH REGULATORY ASSETS FOR EXPENSES RELATED TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333

Response to Commission Staff's Initial Request for Information dated October 26, 2015

November 5, 2015

1 total 2015 ARO-related accretion expense of \$0.154 million,
2 provided in the application, is equal to the sum of the 2015
3 Green ARO-related accretion expense of \$0.085 million (shown
4 in Attachment No. 2) and the 2015 Station Two ARO-related
5 depreciation expense of \$0.069 million (shown in Attachment
6 No. 3).

7 The revised ARO-related accretion expense for 2015,
8 based on the current expected closure date of December 2023 for
9 both ash ponds, is \$0.197 million, consisting of \$0.115 million
10 related to Green and \$0.082 million related to Station Two. The
11 revised calculations of the ARO-related accretion amounts for
12 the Green and Station Two ash ponds are included in
13 Attachments No. 4 and No. 5 to this response, respectively.
14 Attachment No. 8 includes a comparison of the revised ARO
15 related calculations and the original ARO related calculations
16 provided in the application.

- 17 g. The estimated remaining useful lives of Green and Station Two,
18 used to calculate the ARO-related amounts provided in the
19 application, were twenty-four and eighteen years, respectively.
20 These amounts were based on Big Rivers' most recent
21 depreciation study dated November 2012. As discussed in Items
22 2.b, e, and f above, the expected closure dates of the Green and
23 Station Two ash ponds have been revised since the submittal of

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 Big Rivers' application in this case based on the issuance of the
2 ELG rule. The expected closure date for both the Green and
3 Station Two ash ponds is currently December 2023. Please see
4 the response to Item 1 for additional information regarding the
5 change in the expected ash pond closure dates.
6
7

8 **Witnesses)** Nicholas R. Castlen (*all except c.*) and
9 Eric M. Robeson (*c. only*)

Big Rivers Electric Corporation
Proposed ARO-Related Journal Entries for December 2015
Case No. 2015-00333

Entries to establish initial ARO liabilities at present value:

Dr. 101.xxx Plant In Service - ARO	\$	3,941,550		
Cr. 230.xxx ARO Liability			\$	3,941,550
<i>To establish ARO Liability for Green ash pond based on present value of expected future obligation as of May 2015</i>				
Dr. 101.xxx Plant In Service - ARO	\$	2,834,619		
Cr. 230.xxx ARO Liability			\$	2,834,619
<i>To establish ARO Liability for Station Two ash pond based on present value of expected future obligation as of May 2015</i>				

Entries to record ARO-related depreciation and accretion expense for 2015:

Dr. 403.8xx Depreciation Expense - ARO	\$	303,196		
Dr. 411.1xx Accretion Expense - ARO	\$	114,418		
Cr. 108.xxx Accumulated Depreciation - ARO			\$	303,196
Cr. 230.xxx ARO Liability			\$	114,418
<i>To record ARO-related depreciation and accretion expense for the Green ash pond for the months of May 2015 through December 2015</i>				
Dr. 403.8xx Depreciation Expense - ARO	\$	218,048		
Dr. 411.1xx Accretion Expense - ARO	\$	82,286		
Cr. 108.xxx Accumulated Depreciation - ARO			\$	218,048
Cr. 230.xxx ARO Liability			\$	82,286
<i>To record ARO-related depreciation and accretion expense for the Station Two ash pond for the months of May 2015 through December 2015</i>				

Entries to defer recognition of ARO-related depreciation and accretion expense for 2015 and establish regulatory assets:

Dr. 182.3xx Regulatory Asset - ARO	\$	417,615		
Cr. 407.4xx Regulatory Credit			\$	417,615
<i>To defer recognition of ARO-related depreciation and accretion expense associated with the Green ash pond for May 2015 through December 2015 and establish regulatory asset</i>				
Dr. 182.3xx Regulatory Asset - ARO	\$	300,333		
Cr. 407.4xx Regulatory Credit			\$	300,333
<i>To defer recognition of ARO-related depreciation and accretion expense associated with the Station Two ash pond for May 2015 through December 2015 and establish regulatory asset</i>				

**GREEN ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2039	Estimated Retirement Date
24.0	No. of Years Until Retirement Obligation Settled
\$ 4,653,000	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 8,232,967	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,938,770	Present Value of Retirement Obligation
4.17%	Annual Depreciation Rate

Sum of (1)'s = \$ 81,632 2015 Depreciation Expense
Sum of (2)'s = \$ 85,309 2015 Accretion Expense

Acct. Description:
Account No.:

	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant in Service - ARO 101.xxxx Dr./Cr.	Accum. Deprec. - ARO 108.xxxx Dr./Cr.	Liability - ARO 230.xxxx Dr./Cr.	Regulatory Asset - ARO 182.3xxx Dr./Cr.	Depreciation Expense - ARO 403.8xxx Dr./Cr.	Accretion Expense - ARO 411.10x Dr./Cr.	Regulatory Credit 407.4xx Dr./Cr.
May-15 Entry to be Made Dec-15 for Initial ARO Balances	\$ 2,938,770	\$ -	\$ (2,938,770)	\$ -	\$ -	\$ -	\$ -
May-15 Monthly Deprec. & Accretion Exp.		(10,204)	(10,531)	20,735	10,204 (1)	10,531 (2)	(20,735)
Jun-15 Monthly Deprec. & Accretion Exp.		(10,204)	(10,568)	20,772	10,204	10,568	(20,772)
Jul-15 Monthly Deprec. & Accretion Exp.		(10,204)	(10,606)	20,810	10,204	10,606	(20,810)
Aug-15 Monthly Deprec. & Accretion Exp.		(10,204)	(10,644)	20,848	10,204	10,644	(20,848)
Sep-15 Monthly Deprec. & Accretion Exp.		(10,204)	(10,682)	20,886	10,204	10,682	(20,886)
Oct-15 Monthly Deprec. & Accretion Exp.		(10,204)	(10,721)	20,925	10,204	10,721	(20,925)
Nov-15 Monthly Deprec. & Accretion Exp.		(10,204)	(10,759)	20,963	10,204	10,759	(20,963)
Dec-15 Monthly Deprec. & Accretion Exp.		(10,204)	(10,798)	21,002	10,204	10,798	(21,002)
Jan-16 Monthly Deprec. & Accretion Exp.		(10,204)	(10,836)	21,040	10,204	10,836	(21,040)
Feb-16 Monthly Deprec. & Accretion Exp.		(10,204)	(10,875)	21,079	10,204	10,875	(21,079)
Mar-16 Monthly Deprec. & Accretion Exp.		(10,204)	(10,914)	21,118	10,204	10,914	(21,118)
Apr-16 Monthly Deprec. & Accretion Exp.		(10,204)	(10,953)	21,157	10,204	10,953	(21,157)
May-16 Monthly Deprec. & Accretion Exp.		(10,204)	(10,992)	21,197	10,204	10,992	(21,197)
Jun-16 Monthly Deprec. & Accretion Exp.		(10,204)	(11,032)	21,236	10,204	11,032	(21,236)
Jul-16 Monthly Deprec. & Accretion Exp.		(10,204)	(11,071)	21,275	10,204	11,071	(21,275)
Aug-16 Monthly Deprec. & Accretion Exp.		(10,204)	(11,111)	21,315	10,204	11,111	(21,315)
Sep-16 Monthly Deprec. & Accretion Exp.		(10,204)	(11,151)	21,355	10,204	11,151	(21,355)
Oct-16 Monthly Deprec. & Accretion Exp.		(10,204)	(11,191)	21,395	10,204	11,191	(21,395)
Nov-16 Monthly Deprec. & Accretion Exp.		(10,204)	(11,231)	21,435	10,204	11,231	(21,435)
Dec-16 Monthly Deprec. & Accretion Exp.		(10,204)	(11,271)	21,475	10,204	11,271	(21,475)
Jan-17 Monthly Deprec. & Accretion Exp.		(10,204)	(11,312)	21,516	10,204	11,312	(21,516)
Feb-17 Monthly Deprec. & Accretion Exp.		(10,204)	(11,352)	21,556	10,204	11,352	(21,556)
Mar-17 Monthly Deprec. & Accretion Exp.		(10,204)	(11,393)	21,597	10,204	11,393	(21,597)
Apr-17 Monthly Deprec. & Accretion Exp.		(10,204)	(11,434)	21,638	10,204	11,434	(21,638)
May-17 Monthly Deprec. & Accretion Exp.		(10,204)	(11,475)	21,679	10,204	11,475	(21,679)
Jun-17 Monthly Deprec. & Accretion Exp.		(10,204)	(11,516)	21,720	10,204	11,516	(21,720)
Jul-17 Monthly Deprec. & Accretion Exp.		(10,204)	(11,557)	21,761	10,204	11,557	(21,761)
Aug-17 Monthly Deprec. & Accretion Exp.		(10,204)	(11,598)	21,802	10,204	11,598	(21,802)
Sep-17 Monthly Deprec. & Accretion Exp.		(10,204)	(11,640)	21,844	10,204	11,640	(21,844)

**GREEN ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

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December 31, 2015	Initial Accounting Date
May 1, 2039	Estimated Retirement Date
24.0	No. of Years Until Retirement Obligation Settled
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2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 8,232,967	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,938,770	Present Value of Retirement Obligation
4.17%	Annual Depreciation Rate

Sum of (1)'s = \$ 81,632 2015 Depreciation Expense
Sum of (2)'s = \$ 85,309 2015 Accretion Expense

Acct. Description: Account No.:	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant in Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
	101.xxxx Dr./Cr.	108.xxxx Dr./Cr.	230.xxxx Dr./Cr.	182.3xx Dr./Cr.	403.8xx Dr./Cr.	411.10x Dr./Cr.	407.4xx Dr./Cr.
Oct-17	Monthly Deprec. & Accretion Exp.		(11,682)	21,886	10,204	11,682	(21,886)
Nov-17	Monthly Deprec. & Accretion Exp.	(10,204)	(11,723)	21,928	10,204	11,723	(21,928)
Dec-17	Monthly Deprec. & Accretion Exp.	(10,204)	(11,765)	21,970	10,204	11,765	(21,970)
Jan-18	Monthly Deprec. & Accretion Exp.	(10,204)	(11,808)	22,012	10,204	11,808	(22,012)
Feb-18	Monthly Deprec. & Accretion Exp.	(10,204)	(11,850)	22,054	10,204	11,850	(22,054)
Mar-18	Monthly Deprec. & Accretion Exp.	(10,204)	(11,892)	22,096	10,204	11,892	(22,096)
Apr-18	Monthly Deprec. & Accretion Exp.	(10,204)	(11,935)	22,139	10,204	11,935	(22,139)
May-18	Monthly Deprec. & Accretion Exp.	(10,204)	(11,978)	22,182	10,204	11,978	(22,182)
Jun-18	Monthly Deprec. & Accretion Exp.	(10,204)	(12,021)	22,225	10,204	12,021	(22,225)
Jul-18	Monthly Deprec. & Accretion Exp.	(10,204)	(12,064)	22,268	10,204	12,064	(22,268)
Aug-18	Monthly Deprec. & Accretion Exp.	(10,204)	(12,107)	22,311	10,204	12,107	(22,311)
Sep-18	Monthly Deprec. & Accretion Exp.	(10,204)	(12,150)	22,354	10,204	12,150	(22,354)
Oct-18	Monthly Deprec. & Accretion Exp.	(10,204)	(12,194)	22,398	10,204	12,194	(22,398)
Nov-18	Monthly Deprec. & Accretion Exp.	(10,204)	(12,238)	22,442	10,204	12,238	(22,442)
Dec-18	Monthly Deprec. & Accretion Exp.	(10,204)	(12,281)	22,486	10,204	12,281	(22,486)
Jan-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,325)	22,530	10,204	12,325	(22,530)
Feb-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,370)	22,574	10,204	12,370	(22,574)
Mar-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,414)	22,618	10,204	12,414	(22,618)
Apr-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,458)	22,663	10,204	12,458	(22,663)
May-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,503)	22,707	10,204	12,503	(22,707)
Jun-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,548)	22,752	10,204	12,548	(22,752)
Jul-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,593)	22,797	10,204	12,593	(22,797)
Aug-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,638)	22,842	10,204	12,638	(22,842)
Sep-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,683)	22,887	10,204	12,683	(22,887)
Oct-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,729)	22,933	10,204	12,729	(22,933)
Nov-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,774)	22,978	10,204	12,774	(22,978)
Dec-19	Monthly Deprec. & Accretion Exp.	(10,204)	(12,820)	23,024	10,204	12,820	(23,024)
Jan-20	Monthly Deprec. & Accretion Exp.	(10,204)	(12,866)	23,070	10,204	12,866	(23,070)
Feb-20	Monthly Deprec. & Accretion Exp.	(10,204)	(12,912)	23,116	10,204	12,912	(23,116)
Mar-20	Monthly Deprec. & Accretion Exp.	(10,204)	(12,958)	23,162	10,204	12,958	(23,162)

**GREEN ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

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\$ 8,232,967	Future Value of Retirement Obligation
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Sum of (1)'s = \$ 81,632 2015 Depreciation Expense
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Acct. Description: Account No.:	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
	101.xxxx Dr./Cr.)	108.xxxx Dr./Cr.)	230.xxxx Dr./Cr.)	182.3xxx Dr./Cr.)	403.8xxx Dr./Cr.)	411.10x Dr./Cr.)	407.4xx Dr./Cr.)
Apr-20	Monthly Deprec. & Accretion Exp.	(10,204)	(13,005)	23,209	10,204	13,005	(23,209)
May-20	Monthly Deprec. & Accretion Exp.	(10,204)	(13,051)	23,256	10,204	13,051	(23,256)
Jun-20	Monthly Deprec. & Accretion Exp.	(10,204)	(13,098)	23,302	10,204	13,098	(23,302)
Jul-20	Monthly Deprec. & Accretion Exp.	(10,204)	(13,145)	23,349	10,204	13,145	(23,349)
Aug-20	Monthly Deprec. & Accretion Exp.	(10,204)	(13,192)	23,396	10,204	13,192	(23,396)
Sep-20	Monthly Deprec. & Accretion Exp.	(10,204)	(13,240)	23,444	10,204	13,240	(23,444)
Oct-20	Monthly Deprec. & Accretion Exp.	(10,204)	(13,287)	23,491	10,204	13,287	(23,491)
Nov-20	Monthly Deprec. & Accretion Exp.	(10,204)	(13,335)	23,539	10,204	13,335	(23,539)
Dec-20	Monthly Deprec. & Accretion Exp.	(10,204)	(13,382)	23,586	10,204	13,382	(23,586)
Jan-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,430)	23,634	10,204	13,430	(23,634)
Feb-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,478)	23,683	10,204	13,478	(23,683)
Mar-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,527)	23,731	10,204	13,527	(23,731)
Apr-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,575)	23,779	10,204	13,575	(23,779)
May-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,624)	23,828	10,204	13,624	(23,828)
Jun-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,673)	23,877	10,204	13,673	(23,877)
Jul-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,722)	23,926	10,204	13,722	(23,926)
Aug-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,771)	23,975	10,204	13,771	(23,975)
Sep-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,820)	24,024	10,204	13,820	(24,024)
Oct-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,870)	24,074	10,204	13,870	(24,074)
Nov-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,919)	24,123	10,204	13,919	(24,123)
Dec-21	Monthly Deprec. & Accretion Exp.	(10,204)	(13,969)	24,173	10,204	13,969	(24,173)
Jan-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,019)	24,223	10,204	14,019	(24,223)
Feb-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,070)	24,274	10,204	14,070	(24,274)
Mar-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,120)	24,324	10,204	14,120	(24,324)
Apr-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,171)	24,375	10,204	14,171	(24,375)
May-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,221)	24,425	10,204	14,221	(24,425)
Jun-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,272)	24,476	10,204	14,272	(24,476)
Jul-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,323)	24,528	10,204	14,323	(24,528)
Aug-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,375)	24,579	10,204	14,375	(24,579)
Sep-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,426)	24,630	10,204	14,426	(24,630)

**GREEN ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

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Sum of (1)'s = \$ 81,632 2015 Depreciation Expense
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Acct. Description:
Account No.:

	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
	101.xxx Dr./Cr.)	108.xxx Dr./Cr.)	230.xxx Dr./Cr.)	182.3xx Dr./Cr.)	403.8xx Dr./Cr.)	411.10x Dr./Cr.)	407.4xx Dr./Cr.)
Oct-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,478)	24,682	10,204	14,478	(24,682)
Nov-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,530)	24,734	10,204	14,530	(24,734)
Dec-22	Monthly Deprec. & Accretion Exp.	(10,204)	(14,582)	24,786	10,204	14,582	(24,786)
Jan-23	Monthly Deprec. & Accretion Exp.	(10,204)	(14,634)	24,838	10,204	14,634	(24,838)
Feb-23	Monthly Deprec. & Accretion Exp.	(10,204)	(14,687)	24,891	10,204	14,687	(24,891)
Mar-23	Monthly Deprec. & Accretion Exp.	(10,204)	(14,739)	24,943	10,204	14,739	(24,943)
Apr-23	Monthly Deprec. & Accretion Exp.	(10,204)	(14,792)	24,996	10,204	14,792	(24,996)
May-23	Monthly Deprec. & Accretion Exp.	(10,204)	(14,845)	25,049	10,204	14,845	(25,049)
Jun-23	Monthly Deprec. & Accretion Exp.	(10,204)	(14,898)	25,102	10,204	14,898	(25,102)
Jul-23	Monthly Deprec. & Accretion Exp.	(10,204)	(14,952)	25,156	10,204	14,952	(25,156)
Aug-23	Monthly Deprec. & Accretion Exp.	(10,204)	(15,005)	25,209	10,204	15,005	(25,209)
Sep-23	Monthly Deprec. & Accretion Exp.	(10,204)	(15,059)	25,263	10,204	15,059	(25,263)
Oct-23	Monthly Deprec. & Accretion Exp.	(10,204)	(15,113)	25,317	10,204	15,113	(25,317)
Nov-23	Monthly Deprec. & Accretion Exp.	(10,204)	(15,167)	25,371	10,204	15,167	(25,371)
Dec-23	Monthly Deprec. & Accretion Exp.	(10,204)	(15,221)	25,426	10,204	15,221	(25,426)
Jan-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,276)	25,480	10,204	15,276	(25,480)
Feb-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,331)	25,535	10,204	15,331	(25,535)
Mar-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,386)	25,590	10,204	15,386	(25,590)
Apr-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,441)	25,645	10,204	15,441	(25,645)
May-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,496)	25,700	10,204	15,496	(25,700)
Jun-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,552)	25,756	10,204	15,552	(25,756)
Jul-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,607)	25,811	10,204	15,607	(25,811)
Aug-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,663)	25,867	10,204	15,663	(25,867)
Sep-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,719)	25,924	10,204	15,719	(25,924)
Oct-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,776)	25,980	10,204	15,776	(25,980)
Nov-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,832)	26,036	10,204	15,832	(26,036)
Dec-24	Monthly Deprec. & Accretion Exp.	(10,204)	(15,889)	26,093	10,204	15,889	(26,093)
Jan-25	Monthly Deprec. & Accretion Exp.	(10,204)	(15,946)	26,150	10,204	15,946	(26,150)
Feb-25	Monthly Deprec. & Accretion Exp.	(10,204)	(16,003)	26,207	10,204	16,003	(26,207)
Mar-25	Monthly Deprec. & Accretion Exp.	(10,204)	(16,060)	26,265	10,204	16,060	(26,265)

**GREEN ASH PONDS
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Assumptions:

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Acct. Description: Account No.:	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
	101.xxxx Dr./Cr.)	108.xxxx Dr./Cr.)	230.xxxx Dr./Cr.)	182.3xx Dr./Cr.)	403.8xx Dr./Cr.)	411.10x Dr./Cr.)	407.4xx Dr./Cr.)
Apr-25	Monthly Deprec. & Accretion Exp.	(10,204)	(16,118)	26,322	10,204	16,118	(26,322)
May-25	Monthly Deprec. & Accretion Exp.	(10,204)	(16,176)	26,380	10,204	16,176	(26,380)
Jun-25	Monthly Deprec. & Accretion Exp.	(10,204)	(16,234)	26,438	10,204	16,234	(26,438)
Jul-25	Monthly Deprec. & Accretion Exp.	(10,204)	(16,292)	26,496	10,204	16,292	(26,496)
Aug-25	Monthly Deprec. & Accretion Exp.	(10,204)	(16,350)	26,554	10,204	16,350	(26,554)
Sep-25	Monthly Deprec. & Accretion Exp.	(10,204)	(16,409)	26,613	10,204	16,409	(26,613)
Oct-25	Monthly Deprec. & Accretion Exp.	(10,204)	(16,468)	26,672	10,204	16,468	(26,672)
Nov-25	Monthly Deprec. & Accretion Exp.	(10,204)	(16,527)	26,731	10,204	16,527	(26,731)
Dec-25	Monthly Deprec. & Accretion Exp.	(10,204)	(16,586)	26,790	10,204	16,586	(26,790)
Jan-26	Monthly Deprec. & Accretion Exp.	(10,204)	(16,645)	26,849	10,204	16,645	(26,849)
Feb-26	Monthly Deprec. & Accretion Exp.	(10,204)	(16,705)	26,909	10,204	16,705	(26,909)
Mar-26	Monthly Deprec. & Accretion Exp.	(10,204)	(16,765)	26,969	10,204	16,765	(26,969)
Apr-26	Monthly Deprec. & Accretion Exp.	(10,204)	(16,825)	27,029	10,204	16,825	(27,029)
May-26	Monthly Deprec. & Accretion Exp.	(10,204)	(16,885)	27,089	10,204	16,885	(27,089)
Jun-26	Monthly Deprec. & Accretion Exp.	(10,204)	(16,946)	27,150	10,204	16,946	(27,150)
Jul-26	Monthly Deprec. & Accretion Exp.	(10,204)	(17,006)	27,211	10,204	17,006	(27,211)
Aug-26	Monthly Deprec. & Accretion Exp.	(10,204)	(17,067)	27,271	10,204	17,067	(27,271)
Sep-26	Monthly Deprec. & Accretion Exp.	(10,204)	(17,129)	27,333	10,204	17,129	(27,333)
Oct-26	Monthly Deprec. & Accretion Exp.	(10,204)	(17,190)	27,394	10,204	17,190	(27,394)
Nov-26	Monthly Deprec. & Accretion Exp.	(10,204)	(17,252)	27,456	10,204	17,252	(27,456)
Dec-26	Monthly Deprec. & Accretion Exp.	(10,204)	(17,313)	27,517	10,204	17,313	(27,517)
Jan-27	Monthly Deprec. & Accretion Exp.	(10,204)	(17,375)	27,579	10,204	17,375	(27,579)
Feb-27	Monthly Deprec. & Accretion Exp.	(10,204)	(17,438)	27,642	10,204	17,438	(27,642)
Mar-27	Monthly Deprec. & Accretion Exp.	(10,204)	(17,500)	27,704	10,204	17,500	(27,704)
Apr-27	Monthly Deprec. & Accretion Exp.	(10,204)	(17,563)	27,767	10,204	17,563	(27,767)
May-27	Monthly Deprec. & Accretion Exp.	(10,204)	(17,626)	27,830	10,204	17,626	(27,830)
Jun-27	Monthly Deprec. & Accretion Exp.	(10,204)	(17,689)	27,893	10,204	17,689	(27,893)
Jul-27	Monthly Deprec. & Accretion Exp.	(10,204)	(17,752)	27,956	10,204	17,752	(27,956)
Aug-27	Monthly Deprec. & Accretion Exp.	(10,204)	(17,816)	28,020	10,204	17,816	(28,020)
Sep-27	Monthly Deprec. & Accretion Exp.	(10,204)	(17,880)	28,084	10,204	17,880	(28,084)

**GREEN ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2039	Estimated Retirement Date
24.0	No. of Years Until Retirement Obligation Settled
\$ 4,653,000	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 8,232,967	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,938,770	Present Value of Retirement Obligation
4.17%	Annual Depreciation Rate

Sum of (1)'s = \$ 81,632 2015 Depreciation Expense
Sum of (2)'s = \$ 85,309 2015 Accretion Expense

*Acct. Description:
Account No.:*

	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO 101.000 Dr./Cr.	Accum. Deprec. - ARO 108.000 Dr./Cr.	Liability - ARO 230.000 Dr./Cr.	Regulatory Asset - ARO 182.300 Dr./Cr.	Depreciation Expense - ARO 403.800 Dr./Cr.	Accretion Expense - ARO 411.100 Dr./Cr.	Regulatory Credit 407.400 Dr./Cr.
Oct-27	Monthly Deprec. & Accretion Exp.						
Nov-27	Monthly Deprec. & Accretion Exp.	(10,204)	(17,944)	28,148	10,204	17,944	(28,148)
Dec-27	Monthly Deprec. & Accretion Exp.	(10,204)	(18,008)	28,212	10,204	18,008	(28,212)
Jan-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,073)	28,277	10,204	18,073	(28,277)
Feb-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,137)	28,341	10,204	18,137	(28,341)
Mar-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,202)	28,406	10,204	18,202	(28,406)
Apr-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,268)	28,472	10,204	18,268	(28,472)
May-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,333)	28,537	10,204	18,333	(28,537)
Jun-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,399)	28,603	10,204	18,399	(28,603)
Jul-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,465)	28,669	10,204	18,465	(28,669)
Aug-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,531)	28,735	10,204	18,531	(28,735)
Sep-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,597)	28,801	10,204	18,597	(28,801)
Oct-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,664)	28,868	10,204	18,664	(28,868)
Nov-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,731)	28,935	10,204	18,731	(28,935)
Dec-28	Monthly Deprec. & Accretion Exp.	(10,204)	(18,798)	29,002	10,204	18,798	(29,002)
Jan-29	Monthly Deprec. & Accretion Exp.	(10,204)	(18,865)	29,069	10,204	18,865	(29,069)
Feb-29	Monthly Deprec. & Accretion Exp.	(10,204)	(18,933)	29,137	10,204	18,933	(29,137)
Mar-29	Monthly Deprec. & Accretion Exp.	(10,204)	(19,001)	29,205	10,204	19,001	(29,205)
Apr-29	Monthly Deprec. & Accretion Exp.	(10,204)	(19,069)	29,273	10,204	19,069	(29,273)
May-29	Monthly Deprec. & Accretion Exp.	(10,204)	(19,137)	29,341	10,204	19,137	(29,341)
Jun-29	Monthly Deprec. & Accretion Exp.	(10,204)	(19,206)	29,410	10,204	19,206	(29,410)
Jul-29	Monthly Deprec. & Accretion Exp.	(10,204)	(19,275)	29,479	10,204	19,275	(29,479)
Aug-29	Monthly Deprec. & Accretion Exp.	(10,204)	(19,344)	29,548	10,204	19,344	(29,548)
Sep-29	Monthly Deprec. & Accretion Exp.	(10,204)	(19,413)	29,617	10,204	19,413	(29,617)
Oct-29	Monthly Deprec. & Accretion Exp.	(10,204)	(19,482)	29,687	10,204	19,482	(29,687)
Nov-29	Monthly Deprec. & Accretion Exp.	(10,204)	(19,552)	29,756	10,204	19,552	(29,756)
Dec-29	Monthly Deprec. & Accretion Exp.	(10,204)	(19,622)	29,826	10,204	19,622	(29,826)
Jan-30	Monthly Deprec. & Accretion Exp.	(10,204)	(19,693)	29,897	10,204	19,693	(29,897)
Feb-30	Monthly Deprec. & Accretion Exp.	(10,204)	(19,763)	29,967	10,204	19,763	(29,967)
Mar-30	Monthly Deprec. & Accretion Exp.	(10,204)	(19,834)	30,038	10,204	19,834	(30,038)
		(10,204)	(19,905)	30,109	10,204	19,905	(30,109)

**GREEN ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2039	Estimated Retirement Date
24.0	No. of Years Until Retirement Obligation Settled
\$ 4,653,000	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 8,232,967	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,938,770	Present Value of Retirement Obligation
4.17%	Annual Depreciation Rate

Sum of (1)'s = \$ 81,632 2015 Depreciation Expense
Sum of (2)'s = \$ 85,309 2015 Accretion Expense

Acct. Description:
Account No.:

	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
	101.xxxx Dr./Cr.	108.xxxx Dr./Cr.	230.xxxx Dr./Cr.	182.3xx Dr./Cr.	403.8xx Dr./Cr.	411.10x Dr./Cr.	407.4xx Dr./Cr.
Apr-30	Monthly Deprec. & Accretion Exp.	(10,204)	(19,976)	30,181	10,204	19,976	(30,181)
May-30	Monthly Deprec. & Accretion Exp.	(10,204)	(20,048)	30,252	10,204	20,048	(30,252)
Jun-30	Monthly Deprec. & Accretion Exp.	(10,204)	(20,120)	30,324	10,204	20,120	(30,324)
Jul-30	Monthly Deprec. & Accretion Exp.	(10,204)	(20,192)	30,396	10,204	20,192	(30,396)
Aug-30	Monthly Deprec. & Accretion Exp.	(10,204)	(20,264)	30,468	10,204	20,264	(30,468)
Sep-30	Monthly Deprec. & Accretion Exp.	(10,204)	(20,337)	30,541	10,204	20,337	(30,541)
Oct-30	Monthly Deprec. & Accretion Exp.	(10,204)	(20,410)	30,614	10,204	20,410	(30,614)
Nov-30	Monthly Deprec. & Accretion Exp.	(10,204)	(20,483)	30,687	10,204	20,483	(30,687)
Dec-30	Monthly Deprec. & Accretion Exp.	(10,204)	(20,556)	30,760	10,204	20,556	(30,760)
Jan-31	Monthly Deprec. & Accretion Exp.	(10,204)	(20,630)	30,834	10,204	20,630	(30,834)
Feb-31	Monthly Deprec. & Accretion Exp.	(10,204)	(20,704)	30,908	10,204	20,704	(30,908)
Mar-31	Monthly Deprec. & Accretion Exp.	(10,204)	(20,778)	30,982	10,204	20,778	(30,982)
Apr-31	Monthly Deprec. & Accretion Exp.	(10,204)	(20,853)	31,057	10,204	20,853	(31,057)
May-31	Monthly Deprec. & Accretion Exp.	(10,204)	(20,927)	31,131	10,204	20,927	(31,131)
Jun-31	Monthly Deprec. & Accretion Exp.	(10,204)	(21,002)	31,206	10,204	21,002	(31,206)
Jul-31	Monthly Deprec. & Accretion Exp.	(10,204)	(21,078)	31,282	10,204	21,078	(31,282)
Aug-31	Monthly Deprec. & Accretion Exp.	(10,204)	(21,153)	31,357	10,204	21,153	(31,357)
Sep-31	Monthly Deprec. & Accretion Exp.	(10,204)	(21,229)	31,433	10,204	21,229	(31,433)
Oct-31	Monthly Deprec. & Accretion Exp.	(10,204)	(21,305)	31,509	10,204	21,305	(31,509)
Nov-31	Monthly Deprec. & Accretion Exp.	(10,204)	(21,381)	31,585	10,204	21,381	(31,585)
Dec-31	Monthly Deprec. & Accretion Exp.	(10,204)	(21,458)	31,662	10,204	21,458	(31,662)
Jan-32	Monthly Deprec. & Accretion Exp.	(10,204)	(21,535)	31,739	10,204	21,535	(31,739)
Feb-32	Monthly Deprec. & Accretion Exp.	(10,204)	(21,612)	31,816	10,204	21,612	(31,816)
Mar-32	Monthly Deprec. & Accretion Exp.	(10,204)	(21,689)	31,893	10,204	21,689	(31,893)
Apr-32	Monthly Deprec. & Accretion Exp.	(10,204)	(21,767)	31,971	10,204	21,767	(31,971)
May-32	Monthly Deprec. & Accretion Exp.	(10,204)	(21,845)	32,049	10,204	21,845	(32,049)
Jun-32	Monthly Deprec. & Accretion Exp.	(10,204)	(21,923)	32,127	10,204	21,923	(32,127)
Jul-32	Monthly Deprec. & Accretion Exp.	(10,204)	(22,002)	32,206	10,204	22,002	(32,206)
Aug-32	Monthly Deprec. & Accretion Exp.	(10,204)	(22,081)	32,285	10,204	22,081	(32,285)
Sep-32	Monthly Deprec. & Accretion Exp.	(10,204)	(22,160)	32,364	10,204	22,160	(32,364)

**GREEN ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2039	Estimated Retirement Date
24.0	No. of Years Until Retirement Obligation Settled
\$ 4,653,000	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 8,232,967	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,938,770	Present Value of Retirement Obligation
4.17%	Annual Depreciation Rate

Sum of (1)'s = \$ 81,632 2015 Depreciation Expense
Sum of (2)'s = \$ 85,309 2015 Accretion Expense

Acct. Description: Account No.:	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
	101.xxx Dr./Cr.	108.xxx Dr./Cr.	230.xxx Dr./Cr.	182.3xx Dr./Cr.	403.8xx Dr./Cr.	411.10x Dr./Cr.	407.4xx Dr./Cr.
Oct-32	Monthly Deprec. & Accretion Exp.	(10,204)	(22,239)	32,443	10,204	22,239	(32,443)
Nov-32	Monthly Deprec. & Accretion Exp.	(10,204)	(22,319)	32,523	10,204	22,319	(32,523)
Dec-32	Monthly Deprec. & Accretion Exp.	(10,204)	(22,399)	32,603	10,204	22,399	(32,603)
Jan-33	Monthly Deprec. & Accretion Exp.	(10,204)	(22,479)	32,683	10,204	22,479	(32,683)
Feb-33	Monthly Deprec. & Accretion Exp.	(10,204)	(22,560)	32,764	10,204	22,560	(32,764)
Mar-33	Monthly Deprec. & Accretion Exp.	(10,204)	(22,641)	32,845	10,204	22,641	(32,845)
Apr-33	Monthly Deprec. & Accretion Exp.	(10,204)	(22,722)	32,926	10,204	22,722	(32,926)
May-33	Monthly Deprec. & Accretion Exp.	(10,204)	(22,803)	33,007	10,204	22,803	(33,007)
Jun-33	Monthly Deprec. & Accretion Exp.	(10,204)	(22,885)	33,089	10,204	22,885	(33,089)
Jul-33	Monthly Deprec. & Accretion Exp.	(10,204)	(22,967)	33,171	10,204	22,967	(33,171)
Aug-33	Monthly Deprec. & Accretion Exp.	(10,204)	(23,049)	33,253	10,204	23,049	(33,253)
Sep-33	Monthly Deprec. & Accretion Exp.	(10,204)	(23,132)	33,336	10,204	23,132	(33,336)
Oct-33	Monthly Deprec. & Accretion Exp.	(10,204)	(23,215)	33,419	10,204	23,215	(33,419)
Nov-33	Monthly Deprec. & Accretion Exp.	(10,204)	(23,298)	33,502	10,204	23,298	(33,502)
Dec-33	Monthly Deprec. & Accretion Exp.	(10,204)	(23,381)	33,585	10,204	23,381	(33,585)
Jan-34	Monthly Deprec. & Accretion Exp.	(10,204)	(23,465)	33,669	10,204	23,465	(33,669)
Feb-34	Monthly Deprec. & Accretion Exp.	(10,204)	(23,549)	33,753	10,204	23,549	(33,753)
Mar-34	Monthly Deprec. & Accretion Exp.	(10,204)	(23,634)	33,838	10,204	23,634	(33,838)
Apr-34	Monthly Deprec. & Accretion Exp.	(10,204)	(23,718)	33,922	10,204	23,718	(33,922)
May-34	Monthly Deprec. & Accretion Exp.	(10,204)	(23,803)	34,007	10,204	23,803	(34,007)
Jun-34	Monthly Deprec. & Accretion Exp.	(10,204)	(23,889)	34,093	10,204	23,889	(34,093)
Jul-34	Monthly Deprec. & Accretion Exp.	(10,204)	(23,974)	34,178	10,204	23,974	(34,178)
Aug-34	Monthly Deprec. & Accretion Exp.	(10,204)	(24,060)	34,264	10,204	24,060	(34,264)
Sep-34	Monthly Deprec. & Accretion Exp.	(10,204)	(24,146)	34,350	10,204	24,146	(34,350)
Oct-34	Monthly Deprec. & Accretion Exp.	(10,204)	(24,233)	34,437	10,204	24,233	(34,437)
Nov-34	Monthly Deprec. & Accretion Exp.	(10,204)	(24,320)	34,524	10,204	24,320	(34,524)
Dec-34	Monthly Deprec. & Accretion Exp.	(10,204)	(24,407)	34,611	10,204	24,407	(34,611)
Jan-35	Monthly Deprec. & Accretion Exp.	(10,204)	(24,494)	34,698	10,204	24,494	(34,698)
Feb-35	Monthly Deprec. & Accretion Exp.	(10,204)	(24,582)	34,786	10,204	24,582	(34,786)
Mar-35	Monthly Deprec. & Accretion Exp.	(10,204)	(24,670)	34,874	10,204	24,670	(34,874)

**GREEN ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2039	Estimated Retirement Date
24.0	No. of Years Until Retirement Obligation Settled
\$ 4,653,000	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 8,232,967	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,938,770	Present Value of Retirement Obligation
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Sum of (1)'s = \$ 81,632 2015 Depreciation Expense
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Acct. Description: Account No.:	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
	101.xxx Dr./Cr.	108.xxx Dr./Cr.	230.xxx Dr./Cr.	182.3xx Dr./Cr.	403.8xx Dr./Cr.	411.10x Dr./Cr.	407.4xx Dr./Cr.
Apr-35	Monthly Deprec. & Accretion Exp.						
May-35	Monthly Deprec. & Accretion Exp.	(10,204)	(24,759)	34,963	10,204	24,759	(34,963)
Jun-35	Monthly Deprec. & Accretion Exp.	(10,204)	(24,847)	35,051	10,204	24,847	(35,051)
Jul-35	Monthly Deprec. & Accretion Exp.	(10,204)	(24,936)	35,140	10,204	24,936	(35,140)
Aug-35	Monthly Deprec. & Accretion Exp.	(10,204)	(25,026)	35,230	10,204	25,026	(35,230)
Sep-35	Monthly Deprec. & Accretion Exp.	(10,204)	(25,115)	35,319	10,204	25,115	(35,319)
Oct-35	Monthly Deprec. & Accretion Exp.	(10,204)	(25,205)	35,409	10,204	25,205	(35,409)
Nov-35	Monthly Deprec. & Accretion Exp.	(10,204)	(25,296)	35,500	10,204	25,296	(35,500)
Dec-35	Monthly Deprec. & Accretion Exp.	(10,204)	(25,386)	35,590	10,204	25,386	(35,590)
Jan-36	Monthly Deprec. & Accretion Exp.	(10,204)	(25,477)	35,681	10,204	25,477	(35,681)
Feb-36	Monthly Deprec. & Accretion Exp.	(10,204)	(25,569)	35,773	10,204	25,569	(35,773)
Mar-36	Monthly Deprec. & Accretion Exp.	(10,204)	(25,660)	35,864	10,204	25,660	(35,864)
Apr-36	Monthly Deprec. & Accretion Exp.	(10,204)	(25,752)	35,956	10,204	25,752	(35,956)
May-36	Monthly Deprec. & Accretion Exp.	(10,204)	(25,844)	36,048	10,204	25,844	(36,048)
Jun-36	Monthly Deprec. & Accretion Exp.	(10,204)	(25,937)	36,141	10,204	25,937	(36,141)
Jul-36	Monthly Deprec. & Accretion Exp.	(10,204)	(26,030)	36,234	10,204	26,030	(36,234)
Aug-36	Monthly Deprec. & Accretion Exp.	(10,204)	(26,123)	36,327	10,204	26,123	(36,327)
Sep-36	Monthly Deprec. & Accretion Exp.	(10,204)	(26,217)	36,421	10,204	26,217	(36,421)
Oct-36	Monthly Deprec. & Accretion Exp.	(10,204)	(26,311)	36,515	10,204	26,311	(36,515)
Nov-36	Monthly Deprec. & Accretion Exp.	(10,204)	(26,405)	36,609	10,204	26,405	(36,609)
Dec-36	Monthly Deprec. & Accretion Exp.	(10,204)	(26,500)	36,704	10,204	26,500	(36,704)
Jan-37	Monthly Deprec. & Accretion Exp.	(10,204)	(26,595)	36,799	10,204	26,595	(36,799)
Feb-37	Monthly Deprec. & Accretion Exp.	(10,204)	(26,690)	36,894	10,204	26,690	(36,894)
Mar-37	Monthly Deprec. & Accretion Exp.	(10,204)	(26,786)	36,990	10,204	26,786	(36,990)
Apr-37	Monthly Deprec. & Accretion Exp.	(10,204)	(26,882)	37,086	10,204	26,882	(37,086)
May-37	Monthly Deprec. & Accretion Exp.	(10,204)	(26,978)	37,182	10,204	26,978	(37,182)
Jun-37	Monthly Deprec. & Accretion Exp.	(10,204)	(27,075)	37,279	10,204	27,075	(37,279)
Jul-37	Monthly Deprec. & Accretion Exp.	(10,204)	(27,172)	37,376	10,204	27,172	(37,376)
Aug-37	Monthly Deprec. & Accretion Exp.	(10,204)	(27,269)	37,473	10,204	27,269	(37,473)
Sep-37	Monthly Deprec. & Accretion Exp.	(10,204)	(27,367)	37,571	10,204	27,367	(37,571)
		(10,204)	(27,465)	37,669	10,204	27,465	(37,669)

**GREEN ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2039	Estimated Retirement Date
24.0	No. of Years Until Retirement Obligation Settled
\$ 4,653,000	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 8,232,967	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,938,770	Present Value of Retirement Obligation
4.17%	Annual Depreciation Rate

Sum of (1)'s = \$ 81,632 2015 Depreciation Expense
Sum of (2)'s = \$ 85,309 2015 Accretion Expense

Acc't. Description:	Account No.:
Oct-37	Monthly Deprec. & Accretion Exp.
Nov-37	Monthly Deprec. & Accretion Exp.
Dec-37	Monthly Deprec. & Accretion Exp.
Jan-38	Monthly Deprec. & Accretion Exp.
Feb-38	Monthly Deprec. & Accretion Exp.
Mar-38	Monthly Deprec. & Accretion Exp.
Apr-38	Monthly Deprec. & Accretion Exp.
May-38	Monthly Deprec. & Accretion Exp.
Jun-38	Monthly Deprec. & Accretion Exp.
Jul-38	Monthly Deprec. & Accretion Exp.
Aug-38	Monthly Deprec. & Accretion Exp.
Sep-38	Monthly Deprec. & Accretion Exp.
Oct-38	Monthly Deprec. & Accretion Exp.
Nov-38	Monthly Deprec. & Accretion Exp.
Dec-38	Monthly Deprec. & Accretion Exp.
Jan-39	Monthly Deprec. & Accretion Exp.
Feb-39	Monthly Deprec. & Accretion Exp.
Mar-39	Monthly Deprec. & Accretion Exp.
Apr-39	Monthly Deprec. & Accretion Exp.

BALANCE SHEET ACCOUNTS			
Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO
101.xxx Dr./Cr.	108.xxx Dr./Cr.	230.xxx Dr./Cr.	182.3xx Dr./Cr.
	(10,204)	(27,563)	37,767
	(10,204)	(27,662)	37,866
	(10,204)	(27,761)	37,965
	(10,204)	(27,860)	38,065
	(10,204)	(27,960)	38,164
	(10,204)	(28,061)	38,265
	(10,204)	(28,161)	38,365
	(10,204)	(28,262)	38,466
	(10,204)	(28,363)	38,567
	(10,204)	(28,465)	38,669
	(10,204)	(28,567)	38,771
	(10,204)	(28,669)	38,873
	(10,204)	(28,772)	38,976
	(10,204)	(28,875)	39,079
	(10,204)	(28,979)	39,183
	(10,204)	(29,082)	39,286
	(10,204)	(29,187)	39,391
	(10,204)	(29,291)	39,495
	(10,204)	(29,396)	39,600
Ending Balances (before settlement)	\$ 2,938,770	\$ (2,938,770)	\$ 8,232,967

INCOME STATEMENT ACCOUNTS		
Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
403.8xx Dr./Cr.	411.10x Dr./Cr.	407.4xx Dr./Cr.
10,204	27,563	(37,767)
10,204	27,662	(37,866)
10,204	27,761	(37,965)
10,204	27,860	(38,065)
10,204	27,960	(38,164)
10,204	28,061	(38,265)
10,204	28,161	(38,365)
10,204	28,262	(38,466)
10,204	28,363	(38,567)
10,204	28,465	(38,669)
10,204	28,567	(38,771)
10,204	28,669	(38,873)
10,204	28,772	(38,976)
10,204	28,875	(39,079)
10,204	28,979	(39,183)
10,204	29,082	(39,286)
10,204	29,187	(39,391)
10,204	29,291	(39,495)
10,204	29,396	(39,600)
Ending Balances (before settlement)	\$ 2,938,770	\$ (2,938,770)

**STATION TWO ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2033	Estimated Retirement Date
18.0	No. of Years Until Retirement Obligation Settled
\$ 3,346,268	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,133,673	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,370,746	Present Value of Retirement Obligation
5.56%	Annual Depreciation Rate

Sum of (1)'s = \$ 87,805 2015 Depreciation Expense
Sum of (2)'s = \$ 68,820 2015 Accretion Expense

		BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
Acct. Description: Account No.:		Plant In Service - ARO 101.xxx Dr./Cr.)	Accum. Deprec. - ARO 108.xxx Dr./Cr.)	Liability - ARO 230.xxx Dr./Cr.)	Regulatory Asset - ARO 182.xxx Dr./Cr.)	Depreciation Expense - ARO 403.8xx Dr./Cr.)	Accretion Expense - ARO 411.10x Dr./Cr.)	Regulatory Credit 407.4xx Dr./Cr.)
May-15	Entry to be Made Dec-15 for Initial ARO Balances	\$ 2,370,746	\$ -	\$ (2,370,746)	\$ -	\$ -	\$ -	\$ -
May-15	Monthly Deprec. & Accretion Exp.		(10,976)	(8,495)	19,471	10,976	8,495	(19,471)
Jun-15	Monthly Deprec. & Accretion Exp.		(10,976)	(8,526)	19,501	10,976	8,526	(19,501)
Jul-15	Monthly Deprec. & Accretion Exp.		(10,976)	(8,556)	19,532	10,976	8,556	(19,532)
Aug-15	Monthly Deprec. & Accretion Exp.		(10,976)	(8,587)	19,563	10,976	8,587	(19,563)
Sep-15	Monthly Deprec. & Accretion Exp.		(10,976)	(8,618)	19,593	10,976	8,618	(19,593)
Oct-15	Monthly Deprec. & Accretion Exp.		(10,976)	(8,648)	19,624	10,976	8,648	(19,624)
Nov-15	Monthly Deprec. & Accretion Exp.		(10,976)	(8,679)	19,655	10,976	8,679	(19,655)
Dec-15	Monthly Deprec. & Accretion Exp.		(10,976)	(8,711)	19,686	10,976	8,711	(19,686)
Jan-16	Monthly Deprec. & Accretion Exp.		(10,976)	(8,742)	19,717	10,976	8,742	(19,717)
Feb-16	Monthly Deprec. & Accretion Exp.		(10,976)	(8,773)	19,749	10,976	8,773	(19,749)
Mar-16	Monthly Deprec. & Accretion Exp.		(10,976)	(8,805)	19,780	10,976	8,805	(19,780)
Apr-16	Monthly Deprec. & Accretion Exp.		(10,976)	(8,836)	19,812	10,976	8,836	(19,812)
May-16	Monthly Deprec. & Accretion Exp.		(10,976)	(8,868)	19,843	10,976	8,868	(19,843)
Jun-16	Monthly Deprec. & Accretion Exp.		(10,976)	(8,900)	19,875	10,976	8,900	(19,875)
Jul-16	Monthly Deprec. & Accretion Exp.		(10,976)	(8,931)	19,907	10,976	8,931	(19,907)
Aug-16	Monthly Deprec. & Accretion Exp.		(10,976)	(8,963)	19,939	10,976	8,963	(19,939)
Sep-16	Monthly Deprec. & Accretion Exp.		(10,976)	(8,996)	19,971	10,976	8,996	(19,971)
Oct-16	Monthly Deprec. & Accretion Exp.		(10,976)	(9,028)	20,003	10,976	9,028	(20,003)
Nov-16	Monthly Deprec. & Accretion Exp.		(10,976)	(9,060)	20,036	10,976	9,060	(20,036)
Dec-16	Monthly Deprec. & Accretion Exp.		(10,976)	(9,093)	20,068	10,976	9,093	(20,068)
Jan-17	Monthly Deprec. & Accretion Exp.		(10,976)	(9,125)	20,101	10,976	9,125	(20,101)
Feb-17	Monthly Deprec. & Accretion Exp.		(10,976)	(9,158)	20,134	10,976	9,158	(20,134)
Mar-17	Monthly Deprec. & Accretion Exp.		(10,976)	(9,191)	20,166	10,976	9,191	(20,166)
Apr-17	Monthly Deprec. & Accretion Exp.		(10,976)	(9,224)	20,199	10,976	9,224	(20,199)
May-17	Monthly Deprec. & Accretion Exp.		(10,976)	(9,257)	20,232	10,976	9,257	(20,232)
Jun-17	Monthly Deprec. & Accretion Exp.		(10,976)	(9,290)	20,266	10,976	9,290	(20,266)
Jul-17	Monthly Deprec. & Accretion Exp.		(10,976)	(9,323)	20,299	10,976	9,323	(20,299)

**STATION TWO ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2033	Estimated Retirement Date
18.0	No. of Years Until Retirement Obligation Settled
\$ 3,346,268	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,133,673	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,370,746	Present Value of Retirement Obligation
5.56%	Annual Depreciation Rate

Sum of (1)'s = \$ 87,805 2015 Depreciation Expense
Sum of (2)'s = \$ 68,820 2015 Accretion Expense

*Acct. Description:
Account No.:*

	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO 101.xxx Dr./Cr.	Accum. Deprec. - ARO 108.xxx Dr./Cr.	Liability - ARO 230.xxx Dr./Cr.	Regulatory Asset - ARO 182.3xx Dr./Cr.	Depreciation Expense - ARO 403.8xx Dr./Cr.	Accretion Expense - ARO 411.10x Dr./Cr.	Regulatory Credit 407.4xx Dr./Cr.
Aug-17	Monthly Deprec. & Accretion Exp.	(10,976)	(9,357)	20,332	10,976	9,357	(20,332)
Sep-17	Monthly Deprec. & Accretion Exp.	(10,976)	(9,390)	20,366	10,976	9,390	(20,366)
Oct-17	Monthly Deprec. & Accretion Exp.	(10,976)	(9,424)	20,399	10,976	9,424	(20,399)
Nov-17	Monthly Deprec. & Accretion Exp.	(10,976)	(9,457)	20,433	10,976	9,457	(20,433)
Dec-17	Monthly Deprec. & Accretion Exp.	(10,976)	(9,491)	20,467	10,976	9,491	(20,467)
Jan-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,525)	20,501	10,976	9,525	(20,501)
Feb-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,560)	20,535	10,976	9,560	(20,535)
Mar-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,594)	20,569	10,976	9,594	(20,569)
Apr-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,628)	20,604	10,976	9,628	(20,604)
May-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,663)	20,638	10,976	9,663	(20,638)
Jun-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,697)	20,673	10,976	9,697	(20,673)
Jul-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,732)	20,708	10,976	9,732	(20,708)
Aug-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,767)	20,743	10,976	9,767	(20,743)
Sep-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,802)	20,778	10,976	9,802	(20,778)
Oct-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,837)	20,813	10,976	9,837	(20,813)
Nov-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,872)	20,848	10,976	9,872	(20,848)
Dec-18	Monthly Deprec. & Accretion Exp.	(10,976)	(9,908)	20,883	10,976	9,908	(20,883)
Jan-19	Monthly Deprec. & Accretion Exp.	(10,976)	(9,943)	20,919	10,976	9,943	(20,919)
Feb-19	Monthly Deprec. & Accretion Exp.	(10,976)	(9,979)	20,954	10,976	9,979	(20,954)
Mar-19	Monthly Deprec. & Accretion Exp.	(10,976)	(10,015)	20,990	10,976	10,015	(20,990)
Apr-19	Monthly Deprec. & Accretion Exp.	(10,976)	(10,050)	21,026	10,976	10,050	(21,026)
May-19	Monthly Deprec. & Accretion Exp.	(10,976)	(10,086)	21,062	10,976	10,086	(21,062)
Jun-19	Monthly Deprec. & Accretion Exp.	(10,976)	(10,123)	21,098	10,976	10,123	(21,098)
Jul-19	Monthly Deprec. & Accretion Exp.	(10,976)	(10,159)	21,135	10,976	10,159	(21,135)
Aug-19	Monthly Deprec. & Accretion Exp.	(10,976)	(10,195)	21,171	10,976	10,195	(21,171)
Sep-19	Monthly Deprec. & Accretion Exp.	(10,976)	(10,232)	21,207	10,976	10,232	(21,207)
Oct-19	Monthly Deprec. & Accretion Exp.	(10,976)	(10,268)	21,244	10,976	10,268	(21,244)
Nov-19	Monthly Deprec. & Accretion Exp.	(10,976)	(10,305)	21,281	10,976	10,305	(21,281)

**STATION TWO ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2033	Estimated Retirement Date
18.0	No. of Years Until Retirement Obligation Settled
\$ 3,346,268	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,133,673	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,370,746	Present Value of Retirement Obligation
5.56%	Annual Depreciation Rate

Sum of (1)'s = \$ 87,805 2015 Depreciation Expense
Sum of (2)'s = \$ 68,820 2015 Accretion Expense

Acct. Description:
Account No.:

BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
Plant In Service - ARO 101.xxx Dr./Cr.	Accum. Deprec. - ARO 108.xxx Dr./Cr.	Liability - ARO 230.xxx Dr./Cr.	Regulatory Asset - ARO 182.3xx Dr./Cr.	Depreciation Expense - ARO 403.8xx Dr./Cr.	Accretion Expense - ARO 411.10x Dr./Cr.	Regulatory Credit 407.4xx Dr./Cr.
Dec-19	Monthly Deprec. & Accretion Exp.	(10,976)	(10,342)	10,976	10,342	(21,318)
Jan-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,379)	10,976	10,379	(21,355)
Feb-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,416)	10,976	10,416	(21,392)
Mar-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,454)	10,976	10,454	(21,429)
Apr-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,491)	10,976	10,491	(21,467)
May-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,529)	10,976	10,529	(21,504)
Jun-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,567)	10,976	10,567	(21,542)
Jul-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,604)	10,976	10,604	(21,580)
Aug-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,642)	10,976	10,642	(21,618)
Sep-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,681)	10,976	10,681	(21,656)
Oct-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,719)	10,976	10,719	(21,694)
Nov-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,757)	10,976	10,757	(21,733)
Dec-20	Monthly Deprec. & Accretion Exp.	(10,976)	(10,796)	10,976	10,796	(21,771)
Jan-21	Monthly Deprec. & Accretion Exp.	(10,976)	(10,834)	10,976	10,834	(21,810)
Feb-21	Monthly Deprec. & Accretion Exp.	(10,976)	(10,873)	10,976	10,873	(21,849)
Mar-21	Monthly Deprec. & Accretion Exp.	(10,976)	(10,912)	10,976	10,912	(21,888)
Apr-21	Monthly Deprec. & Accretion Exp.	(10,976)	(10,951)	10,976	10,951	(21,927)
May-21	Monthly Deprec. & Accretion Exp.	(10,976)	(10,991)	10,976	10,991	(21,966)
Jun-21	Monthly Deprec. & Accretion Exp.	(10,976)	(11,030)	10,976	11,030	(22,006)
Jul-21	Monthly Deprec. & Accretion Exp.	(10,976)	(11,069)	10,976	11,069	(22,045)
Aug-21	Monthly Deprec. & Accretion Exp.	(10,976)	(11,109)	10,976	11,109	(22,085)
Sep-21	Monthly Deprec. & Accretion Exp.	(10,976)	(11,149)	10,976	11,149	(22,125)
Oct-21	Monthly Deprec. & Accretion Exp.	(10,976)	(11,189)	10,976	11,189	(22,165)
Nov-21	Monthly Deprec. & Accretion Exp.	(10,976)	(11,229)	10,976	11,229	(22,205)
Dec-21	Monthly Deprec. & Accretion Exp.	(10,976)	(11,269)	10,976	11,269	(22,245)
Jan-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,310)	10,976	11,310	(22,285)
Feb-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,350)	10,976	11,350	(22,326)
Mar-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,391)	10,976	11,391	(22,366)

**STATION TWO ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2033	Estimated Retirement Date
18.0	No. of Years Until Retirement Obligation Settled
\$ 3,346,268	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,133,673	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,370,746	Present Value of Retirement Obligation
5.56%	Annual Depreciation Rate

Sum of (1)'s = \$ 87,805 2015 Depreciation Expense
Sum of (2)'s = \$ 68,820 2015 Accretion Expense

*Acct. Description:
Account No.:*

	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
	101.xxx Dr./Cr.	108.xxx Dr./Cr.	230.xxx Dr./Cr.	182.3xx Dr./Cr.	403.8xx Dr./Cr.	411.10x Dr./Cr.	407.4xx Dr./Cr.
Apr-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,432)	22,407	10,976	11,432	(22,407)
May-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,473)	22,448	10,976	11,473	(22,448)
Jun-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,514)	22,489	10,976	11,514	(22,489)
Jul-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,555)	22,531	10,976	11,555	(22,531)
Aug-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,596)	22,572	10,976	11,596	(22,572)
Sep-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,638)	22,614	10,976	11,638	(22,614)
Oct-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,680)	22,655	10,976	11,680	(22,655)
Nov-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,721)	22,697	10,976	11,721	(22,697)
Dec-22	Monthly Deprec. & Accretion Exp.	(10,976)	(11,763)	22,739	10,976	11,763	(22,739)
Jan-23	Monthly Deprec. & Accretion Exp.	(10,976)	(11,806)	22,781	10,976	11,806	(22,781)
Feb-23	Monthly Deprec. & Accretion Exp.	(10,976)	(11,848)	22,824	10,976	11,848	(22,824)
Mar-23	Monthly Deprec. & Accretion Exp.	(10,976)	(11,890)	22,866	10,976	11,890	(22,866)
Apr-23	Monthly Deprec. & Accretion Exp.	(10,976)	(11,933)	22,909	10,976	11,933	(22,909)
May-23	Monthly Deprec. & Accretion Exp.	(10,976)	(11,976)	22,951	10,976	11,976	(22,951)
Jun-23	Monthly Deprec. & Accretion Exp.	(10,976)	(12,019)	22,994	10,976	12,019	(22,994)
Jul-23	Monthly Deprec. & Accretion Exp.	(10,976)	(12,062)	23,037	10,976	12,062	(23,037)
Aug-23	Monthly Deprec. & Accretion Exp.	(10,976)	(12,105)	23,081	10,976	12,105	(23,081)
Sep-23	Monthly Deprec. & Accretion Exp.	(10,976)	(12,148)	23,124	10,976	12,148	(23,124)
Oct-23	Monthly Deprec. & Accretion Exp.	(10,976)	(12,192)	23,168	10,976	12,192	(23,168)
Nov-23	Monthly Deprec. & Accretion Exp.	(10,976)	(12,236)	23,211	10,976	12,236	(23,211)
Dec-23	Monthly Deprec. & Accretion Exp.	(10,976)	(12,279)	23,255	10,976	12,279	(23,255)
Jan-24	Monthly Deprec. & Accretion Exp.	(10,976)	(12,323)	23,299	10,976	12,323	(23,299)
Feb-24	Monthly Deprec. & Accretion Exp.	(10,976)	(12,368)	23,343	10,976	12,368	(23,343)
Mar-24	Monthly Deprec. & Accretion Exp.	(10,976)	(12,412)	23,388	10,976	12,412	(23,388)
Apr-24	Monthly Deprec. & Accretion Exp.	(10,976)	(12,456)	23,432	10,976	12,456	(23,432)
May-24	Monthly Deprec. & Accretion Exp.	(10,976)	(12,501)	23,477	10,976	12,501	(23,477)
Jun-24	Monthly Deprec. & Accretion Exp.	(10,976)	(12,546)	23,521	10,976	12,546	(23,521)
Jul-24	Monthly Deprec. & Accretion Exp.	(10,976)	(12,591)	23,566	10,976	12,591	(23,566)

**STATION TWO ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2033	Estimated Retirement Date
18.0	No. of Years Until Retirement Obligation Settled
\$ 3,346,268	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,133,673	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,370,746	Present Value of Retirement Obligation
5.56%	Annual Depreciation Rate

Sum of (1)'s = \$ 87,805 2015 Depreciation Expense
Sum of (2)'s = \$ 68,820 2015 Accretion Expense

*Acct. Description:
Account No.:*

Aug-24 Monthly Deprec. & Accretion Exp.
Sep-24 Monthly Deprec. & Accretion Exp.
Oct-24 Monthly Deprec. & Accretion Exp.
Nov-24 Monthly Deprec. & Accretion Exp.
Dec-24 Monthly Deprec. & Accretion Exp.
Jan-25 Monthly Deprec. & Accretion Exp.
Feb-25 Monthly Deprec. & Accretion Exp.
Mar-25 Monthly Deprec. & Accretion Exp.
Apr-25 Monthly Deprec. & Accretion Exp.
May-25 Monthly Deprec. & Accretion Exp.
Jun-25 Monthly Deprec. & Accretion Exp.
Jul-25 Monthly Deprec. & Accretion Exp.
Aug-25 Monthly Deprec. & Accretion Exp.
Sep-25 Monthly Deprec. & Accretion Exp.
Oct-25 Monthly Deprec. & Accretion Exp.
Nov-25 Monthly Deprec. & Accretion Exp.
Dec-25 Monthly Deprec. & Accretion Exp.
Jan-26 Monthly Deprec. & Accretion Exp.
Feb-26 Monthly Deprec. & Accretion Exp.
Mar-26 Monthly Deprec. & Accretion Exp.
Apr-26 Monthly Deprec. & Accretion Exp.
May-26 Monthly Deprec. & Accretion Exp.
Jun-26 Monthly Deprec. & Accretion Exp.
Jul-26 Monthly Deprec. & Accretion Exp.
Aug-26 Monthly Deprec. & Accretion Exp.
Sep-26 Monthly Deprec. & Accretion Exp.
Oct-26 Monthly Deprec. & Accretion Exp.
Nov-26 Monthly Deprec. & Accretion Exp.

BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
Plant In Service - ARO 101.xxx Dr./Cr.)	Accum. Deprec. - ARO 108.xxx Dr./Cr.)	Liability - ARO 230.xxx Dr./Cr.)	Regulatory Asset - ARO 182.3xx Dr./Cr.)	Depreciation Expense - ARO 403.8xx Dr./Cr.)	Accretion Expense - ARO 411.10x Dr./Cr.)	Regulatory Credit 407.4xx Dr./Cr.)
	(10,976)	(12,636)	23,612	10,976	12,636	(23,612)
	(10,976)	(12,681)	23,657	10,976	12,681	(23,657)
	(10,976)	(12,727)	23,702	10,976	12,727	(23,702)
	(10,976)	(12,772)	23,748	10,976	12,772	(23,748)
	(10,976)	(12,818)	23,794	10,976	12,818	(23,794)
	(10,976)	(12,864)	23,840	10,976	12,864	(23,840)
	(10,976)	(12,910)	23,886	10,976	12,910	(23,886)
	(10,976)	(12,956)	23,932	10,976	12,956	(23,932)
	(10,976)	(13,003)	23,978	10,976	13,003	(23,978)
	(10,976)	(13,049)	24,025	10,976	13,049	(24,025)
	(10,976)	(13,096)	24,072	10,976	13,096	(24,072)
	(10,976)	(13,143)	24,119	10,976	13,143	(24,119)
	(10,976)	(13,190)	24,166	10,976	13,190	(24,166)
	(10,976)	(13,237)	24,213	10,976	13,237	(24,213)
	(10,976)	(13,285)	24,260	10,976	13,285	(24,260)
	(10,976)	(13,332)	24,308	10,976	13,332	(24,308)
	(10,976)	(13,380)	24,356	10,976	13,380	(24,356)
	(10,976)	(13,428)	24,404	10,976	13,428	(24,404)
	(10,976)	(13,476)	24,452	10,976	13,476	(24,452)
	(10,976)	(13,524)	24,500	10,976	13,524	(24,500)
	(10,976)	(13,573)	24,549	10,976	13,573	(24,549)
	(10,976)	(13,622)	24,597	10,976	13,622	(24,597)
	(10,976)	(13,670)	24,646	10,976	13,670	(24,646)
	(10,976)	(13,719)	24,695	10,976	13,719	(24,695)
	(10,976)	(13,769)	24,744	10,976	13,769	(24,744)
	(10,976)	(13,818)	24,794	10,976	13,818	(24,794)
	(10,976)	(13,867)	24,843	10,976	13,867	(24,843)
	(10,976)	(13,917)	24,893	10,976	13,917	(24,893)

**STATION TWO ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2033	Estimated Retirement Date
18.0	No. of Years Until Retirement Obligation Settled
\$ 3,346,268	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,133,673	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,370,746	Present Value of Retirement Obligation
5.56%	Annual Depreciation Rate

Sum of (1)'s = \$ 87,805 2015 Depreciation Expense
Sum of (2)'s = \$ 68,820 2015 Accretion Expense

Acct. Description: Account No.:	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO 101.xxx Dr./Cr.	Accum. Deprec. - ARO 108.xxx Dr./Cr.	Liability - ARO 230.xxx Dr./Cr.	Regulatory Asset - ARO 182.3xx Dr./Cr.	Depreciation Expense - ARO 403.8xx Dr./Cr.	Accretion Expense - ARO 411.10x Dr./Cr.	Regulatory Credit 407.4xx Dr./Cr.
Dec-26	Monthly Deprec. & Accretion Exp.	(10,976)	(13,967)	24,943	10,976	13,967	(24,943)
Jan-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,017)	24,993	10,976	14,017	(24,993)
Feb-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,067)	25,043	10,976	14,067	(25,043)
Mar-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,118)	25,093	10,976	14,118	(25,093)
Apr-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,168)	25,144	10,976	14,168	(25,144)
May-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,219)	25,195	10,976	14,219	(25,195)
Jun-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,270)	25,246	10,976	14,270	(25,246)
Jul-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,321)	25,297	10,976	14,321	(25,297)
Aug-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,372)	25,348	10,976	14,372	(25,348)
Sep-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,424)	25,400	10,976	14,424	(25,400)
Oct-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,476)	25,451	10,976	14,476	(25,451)
Nov-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,527)	25,503	10,976	14,527	(25,503)
Dec-27	Monthly Deprec. & Accretion Exp.	(10,976)	(14,579)	25,555	10,976	14,579	(25,555)
Jan-28	Monthly Deprec. & Accretion Exp.	(10,976)	(14,632)	25,607	10,976	14,632	(25,607)
Feb-28	Monthly Deprec. & Accretion Exp.	(10,976)	(14,684)	25,660	10,976	14,684	(25,660)
Mar-28	Monthly Deprec. & Accretion Exp.	(10,976)	(14,737)	25,712	10,976	14,737	(25,712)
Apr-28	Monthly Deprec. & Accretion Exp.	(10,976)	(14,790)	25,765	10,976	14,790	(25,765)
May-28	Monthly Deprec. & Accretion Exp.	(10,976)	(14,843)	25,818	10,976	14,843	(25,818)
Jun-28	Monthly Deprec. & Accretion Exp.	(10,976)	(14,896)	25,871	10,976	14,896	(25,871)
Jul-28	Monthly Deprec. & Accretion Exp.	(10,976)	(14,949)	25,925	10,976	14,949	(25,925)
Aug-28	Monthly Deprec. & Accretion Exp.	(10,976)	(15,003)	25,978	10,976	15,003	(25,978)
Sep-28	Monthly Deprec. & Accretion Exp.	(10,976)	(15,056)	26,032	10,976	15,056	(26,032)
Oct-28	Monthly Deprec. & Accretion Exp.	(10,976)	(15,110)	26,086	10,976	15,110	(26,086)
Nov-28	Monthly Deprec. & Accretion Exp.	(10,976)	(15,165)	26,140	10,976	15,165	(26,140)
Dec-28	Monthly Deprec. & Accretion Exp.	(10,976)	(15,219)	26,195	10,976	15,219	(26,195)
Jan-29	Monthly Deprec. & Accretion Exp.	(10,976)	(15,273)	26,249	10,976	15,273	(26,249)
Feb-29	Monthly Deprec. & Accretion Exp.	(10,976)	(15,328)	26,304	10,976	15,328	(26,304)
Mar-29	Monthly Deprec. & Accretion Exp.	(10,976)	(15,383)	26,359	10,976	15,383	(26,359)

**STATION TWO ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2033	Estimated Retirement Date
18.0	No. of Years Until Retirement Obligation Settled
\$ 3,346,268	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,133,673	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,370,746	Present Value of Retirement Obligation
5.56%	Annual Depreciation Rate

Sum of (1)'s = \$ 87,805 2015 Depreciation Expense

Sum of (2)'s = \$ 68,820 2015 Accretion Expense

Acct. Description: Account No.:	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO 101.xxx Dr./Cr.	Accum. Deprec. - ARO 108.xxx Dr./Cr.	Liability - ARO 230.xxx Dr./Cr.	Regulatory Asset - ARO 182.3xx Dr./Cr.	Depreciation Expense ARO 403.8xx Dr./Cr.	Accretion Expense - ARO 411.10x Dr./Cr.	Regulatory Credit 407.4xx Dr./Cr.
	Apr-29 Monthly Deprec. & Accretion Exp.	(10,976)	(15,438)	26,414	10,976	15,438	(26,414)
May-29 Monthly Deprec. & Accretion Exp.	(10,976)	(15,494)	26,469	10,976	15,494	(26,469)	
Jun-29 Monthly Deprec. & Accretion Exp.	(10,976)	(15,549)	26,525	10,976	15,549	(26,525)	
Jul-29 Monthly Deprec. & Accretion Exp.	(10,976)	(15,605)	26,580	10,976	15,605	(26,580)	
Aug-29 Monthly Deprec. & Accretion Exp.	(10,976)	(15,661)	26,636	10,976	15,661	(26,636)	
Sep-29 Monthly Deprec. & Accretion Exp.	(10,976)	(15,717)	26,692	10,976	15,717	(26,692)	
Oct-29 Monthly Deprec. & Accretion Exp.	(10,976)	(15,773)	26,749	10,976	15,773	(26,749)	
Nov-29 Monthly Deprec. & Accretion Exp.	(10,976)	(15,830)	26,805	10,976	15,830	(26,805)	
Dec-29 Monthly Deprec. & Accretion Exp.	(10,976)	(15,886)	26,862	10,976	15,886	(26,862)	
Jan-30 Monthly Deprec. & Accretion Exp.	(10,976)	(15,943)	26,919	10,976	15,943	(26,919)	
Feb-30 Monthly Deprec. & Accretion Exp.	(10,976)	(16,000)	26,976	10,976	16,000	(26,976)	
Mar-30 Monthly Deprec. & Accretion Exp.	(10,976)	(16,058)	27,033	10,976	16,058	(27,033)	
Apr-30 Monthly Deprec. & Accretion Exp.	(10,976)	(16,115)	27,091	10,976	16,115	(27,091)	
May-30 Monthly Deprec. & Accretion Exp.	(10,976)	(16,173)	27,149	10,976	16,173	(27,149)	
Jun-30 Monthly Deprec. & Accretion Exp.	(10,976)	(16,231)	27,207	10,976	16,231	(27,207)	
Jul-30 Monthly Deprec. & Accretion Exp.	(10,976)	(16,289)	27,265	10,976	16,289	(27,265)	
Aug-30 Monthly Deprec. & Accretion Exp.	(10,976)	(16,348)	27,323	10,976	16,348	(27,323)	
Sep-30 Monthly Deprec. & Accretion Exp.	(10,976)	(16,406)	27,382	10,976	16,406	(27,382)	
Oct-30 Monthly Deprec. & Accretion Exp.	(10,976)	(16,465)	27,441	10,976	16,465	(27,441)	
Nov-30 Monthly Deprec. & Accretion Exp.	(10,976)	(16,524)	27,500	10,976	16,524	(27,500)	
Dec-30 Monthly Deprec. & Accretion Exp.	(10,976)	(16,583)	27,559	10,976	16,583	(27,559)	
Jan-31 Monthly Deprec. & Accretion Exp.	(10,976)	(16,643)	27,618	10,976	16,643	(27,618)	
Feb-31 Monthly Deprec. & Accretion Exp.	(10,976)	(16,702)	27,678	10,976	16,702	(27,678)	
Mar-31 Monthly Deprec. & Accretion Exp.	(10,976)	(16,762)	27,738	10,976	16,762	(27,738)	
Apr-31 Monthly Deprec. & Accretion Exp.	(10,976)	(16,822)	27,798	10,976	16,822	(27,798)	
May-31 Monthly Deprec. & Accretion Exp.	(10,976)	(16,882)	27,858	10,976	16,882	(27,858)	
Jun-31 Monthly Deprec. & Accretion Exp.	(10,976)	(16,943)	27,919	10,976	16,943	(27,919)	
Jul-31 Monthly Deprec. & Accretion Exp.	(10,976)	(17,004)	27,979	10,976	17,004	(27,979)	

**STATION TWO ASH PONDS
SUPERSEDED ARO CALCULATIONS (USED FOR APPLICATION)**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
May 1, 2033	Estimated Retirement Date
18.0	No. of Years Until Retirement Obligation Settled
\$ 3,346,268	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,133,673	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,370,746	Present Value of Retirement Obligation
5.56%	Annual Depreciation Rate

Sum of (1)'s = \$ 87,805 2015 Depreciation Expense
Sum of (2)'s = \$ 68,820 2015 Accretion Expense

*Acct. Description:
Account No.:*

Aug-31	Monthly Deprec. & Accretion Exp.
Sep-31	Monthly Deprec. & Accretion Exp.
Oct-31	Monthly Deprec. & Accretion Exp.
Nov-31	Monthly Deprec. & Accretion Exp.
Dec-31	Monthly Deprec. & Accretion Exp.
Jan-32	Monthly Deprec. & Accretion Exp.
Feb-32	Monthly Deprec. & Accretion Exp.
Mar-32	Monthly Deprec. & Accretion Exp.
Apr-32	Monthly Deprec. & Accretion Exp.
May-32	Monthly Deprec. & Accretion Exp.
Jun-32	Monthly Deprec. & Accretion Exp.
Jul-32	Monthly Deprec. & Accretion Exp.
Aug-32	Monthly Deprec. & Accretion Exp.
Sep-32	Monthly Deprec. & Accretion Exp.
Oct-32	Monthly Deprec. & Accretion Exp.
Nov-32	Monthly Deprec. & Accretion Exp.
Dec-32	Monthly Deprec. & Accretion Exp.
Jan-33	Monthly Deprec. & Accretion Exp.
Feb-33	Monthly Deprec. & Accretion Exp.
Mar-33	Monthly Deprec. & Accretion Exp.
Apr-33	Monthly Deprec. & Accretion Exp.

BALANCE SHEET ACCOUNTS			
Plant In Service - ARO 101.xxx Dr./(Cr.)	Accum. Deprec. - ARO 108.xxx Dr./(Cr.)	Liability - ARO 230.xxx Dr./(Cr.)	Regulatory Asset - ARO 182.3xx Dr./(Cr.)
	(10,976)	(17,064)	28,040
	(10,976)	(17,126)	28,101
	(10,976)	(17,187)	28,163
	(10,976)	(17,249)	28,224
	(10,976)	(17,310)	28,286
	(10,976)	(17,372)	28,348
	(10,976)	(17,435)	28,410
	(10,976)	(17,497)	28,473
	(10,976)	(17,560)	28,536
	(10,976)	(17,623)	28,598
	(10,976)	(17,686)	28,662
	(10,976)	(17,749)	28,725
	(10,976)	(17,813)	28,789
	(10,976)	(17,877)	28,852
	(10,976)	(17,941)	28,916
	(10,976)	(18,005)	28,981
	(10,976)	(18,070)	29,045
	(10,976)	(18,134)	29,110
	(10,976)	(18,199)	29,175
	(10,976)	(18,265)	29,240
	(10,976)	(18,330)	29,306
Ending Balances (before settlement)	\$ (2,370,746)	\$ (5,133,673)	\$ 5,133,673

INCOME STATEMENT ACCOUNTS		
Depreciation Expense - ARO 403.8xx Dr./(Cr.)	Accretion Expense - ARO 411.10x Dr./(Cr.)	Regulatory Credit 407.4xx Dr./(Cr.)
10,976	17,064	(28,040)
10,976	17,126	(28,101)
10,976	17,187	(28,163)
10,976	17,249	(28,224)
10,976	17,310	(28,286)
10,976	17,372	(28,348)
10,976	17,435	(28,410)
10,976	17,497	(28,473)
10,976	17,560	(28,536)
10,976	17,623	(28,598)
10,976	17,686	(28,662)
10,976	17,749	(28,725)
10,976	17,813	(28,789)
10,976	17,877	(28,852)
10,976	17,941	(28,916)
10,976	18,005	(28,981)
10,976	18,070	(29,045)
10,976	18,134	(29,110)
10,976	18,199	(29,175)
10,976	18,265	(29,240)
10,976	18,330	(29,306)
\$ 2,370,746	\$ 2,762,927	\$ (5,133,673)

GREEN ASH PONDS
UPDATED ARO CALCULATIONS BASED ON DECEMBER 2023 CLOSURE DATE

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
December 31, 2023	Estimated Retirement Date
8.7	No. of Years Until Retirement Obligation Settled
\$ 4,653,000	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,717,745	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 3,941,550	Present Value of Retirement Obligation
11.54%	Annual Depreciation Rate

Sum of (1)'s = \$ 303,196 2015 Depreciation Expense
 Sum of (2)'s = \$ 114,418 2015 Accretion Expense

		BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
<i>Acct. Description:</i>		Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
<i>Account No.:</i>		101.xxx	108.xxx	230.xxx	182.3xx	403.8xx	411.10x	407.4xx
		Dr./Cr.	Dr./Cr.	Dr./Cr.	Dr./Cr.	Dr./Cr.	Dr./Cr.	Dr./Cr.
May-15	Entry to be Made Dec-15 for Initial ARO Balances	\$ 3,941,550	\$ -	\$ (3,941,550)	\$ -	\$ -	\$ -	\$ -
May-15	Monthly Deprec. & Accretion Exp.		(37,900)	(14,124)	52,023	37,900 ⁽¹⁾	14,124 ⁽²⁾	(52,023)
Jun-15	Monthly Deprec. & Accretion Exp.		(37,900)	(14,174)	52,074	37,900	14,174	(52,074)
Jul-15	Monthly Deprec. & Accretion Exp.		(37,900)	(14,225)	52,125	37,900	14,225	(52,125)
Aug-15	Monthly Deprec. & Accretion Exp.		(37,900)	(14,276)	52,176	37,900	14,276	(52,176)
Sep-15	Monthly Deprec. & Accretion Exp.		(37,900)	(14,327)	52,227	37,900	14,327	(52,227)
Oct-15	Monthly Deprec. & Accretion Exp.		(37,900)	(14,379)	52,278	37,900	14,379	(52,278)
Nov-15	Monthly Deprec. & Accretion Exp.		(37,900)	(14,430)	52,330	37,900	14,430	(52,330)
Dec-15	Monthly Deprec. & Accretion Exp.		(37,900)	(14,482)	52,382	37,900	14,482	(52,382)
Jan-16	Monthly Deprec. & Accretion Exp.		(37,900)	(14,534)	52,433	37,900	14,534	(52,433)
Feb-16	Monthly Deprec. & Accretion Exp.		(37,900)	(14,586)	52,485	37,900	14,586	(52,485)
Mar-16	Monthly Deprec. & Accretion Exp.		(37,900)	(14,638)	52,538	37,900	14,638	(52,538)
Apr-16	Monthly Deprec. & Accretion Exp.		(37,900)	(14,691)	52,590	37,900	14,691	(52,590)
May-16	Monthly Deprec. & Accretion Exp.		(37,900)	(14,743)	52,643	37,900	14,743	(52,643)
Jun-16	Monthly Deprec. & Accretion Exp.		(37,900)	(14,796)	52,696	37,900	14,796	(52,696)
Jul-16	Monthly Deprec. & Accretion Exp.		(37,900)	(14,849)	52,749	37,900	14,849	(52,749)
Aug-16	Monthly Deprec. & Accretion Exp.		(37,900)	(14,902)	52,802	37,900	14,902	(52,802)
Sep-16	Monthly Deprec. & Accretion Exp.		(37,900)	(14,956)	52,855	37,900	14,956	(52,855)
Oct-16	Monthly Deprec. & Accretion Exp.		(37,900)	(15,009)	52,909	37,900	15,009	(52,909)
Nov-16	Monthly Deprec. & Accretion Exp.		(37,900)	(15,063)	52,963	37,900	15,063	(52,963)
Dec-16	Monthly Deprec. & Accretion Exp.		(37,900)	(15,117)	53,017	37,900	15,117	(53,017)
Jan-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,171)	53,071	37,900	15,171	(53,071)
Feb-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,226)	53,125	37,900	15,226	(53,125)
Mar-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,280)	53,180	37,900	15,280	(53,180)
Apr-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,335)	53,235	37,900	15,335	(53,235)
May-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,390)	53,289	37,900	15,390	(53,289)

GREEN ASH PONDS
UPDATED ARO CALCULATIONS BASED ON DECEMBER 2023 CLOSURE DATE

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
December 31, 2023	Estimated Retirement Date
8.7	No. of Years Until Retirement Obligation Settled
\$ 4,653,000	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,717,745	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 3,941,550	Present Value of Retirement Obligation
11.54%	Annual Depreciation Rate

Sum of (1)'s = \$ 303,196 2015 Depreciation Expense
 Sum of (2)'s = \$ 114,418 2015 Accretion Expense

		BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
<i>Acct. Description:</i>		Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
<i>Account No.:</i>		101.xxx	108.xxx	230.xxx	182.3xx	403.8xx	411.10x	407.4xx
		Dr./Cr.)	Dr./Cr.)	Dr./Cr.)	Dr./Cr.)	Dr./Cr.)	Dr./Cr.)	Dr./Cr.)
Jun-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,445)	53,345	37,900	15,445	(53,345)
Jul-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,500)	53,400	37,900	15,500	(53,400)
Aug-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,556)	53,455	37,900	15,556	(53,455)
Sep-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,612)	53,511	37,900	15,612	(53,511)
Oct-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,668)	53,567	37,900	15,668	(53,567)
Nov-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,724)	53,623	37,900	15,724	(53,623)
Dec-17	Monthly Deprec. & Accretion Exp.		(37,900)	(15,780)	53,680	37,900	15,780	(53,680)
Jan-18	Monthly Deprec. & Accretion Exp.		(37,900)	(15,837)	53,736	37,900	15,837	(53,736)
Feb-18	Monthly Deprec. & Accretion Exp.		(37,900)	(15,893)	53,793	37,900	15,893	(53,793)
Mar-18	Monthly Deprec. & Accretion Exp.		(37,900)	(15,950)	53,850	37,900	15,950	(53,850)
Apr-18	Monthly Deprec. & Accretion Exp.		(37,900)	(16,008)	53,907	37,900	16,008	(53,907)
May-18	Monthly Deprec. & Accretion Exp.		(37,900)	(16,065)	53,964	37,900	16,065	(53,964)
Jun-18	Monthly Deprec. & Accretion Exp.		(37,900)	(16,122)	54,022	37,900	16,122	(54,022)
Jul-18	Monthly Deprec. & Accretion Exp.		(37,900)	(16,180)	54,080	37,900	16,180	(54,080)
Aug-18	Monthly Deprec. & Accretion Exp.		(37,900)	(16,238)	54,138	37,900	16,238	(54,138)
Sep-18	Monthly Deprec. & Accretion Exp.		(37,900)	(16,296)	54,196	37,900	16,296	(54,196)
Oct-18	Monthly Deprec. & Accretion Exp.		(37,900)	(16,355)	54,254	37,900	16,355	(54,254)
Nov-18	Monthly Deprec. & Accretion Exp.		(37,900)	(16,413)	54,313	37,900	16,413	(54,313)
Dec-18	Monthly Deprec. & Accretion Exp.		(37,900)	(16,472)	54,372	37,900	16,472	(54,372)
Jan-19	Monthly Deprec. & Accretion Exp.		(37,900)	(16,531)	54,431	37,900	16,531	(54,431)
Feb-19	Monthly Deprec. & Accretion Exp.		(37,900)	(16,590)	54,490	37,900	16,590	(54,490)
Mar-19	Monthly Deprec. & Accretion Exp.		(37,900)	(16,650)	54,549	37,900	16,650	(54,549)
Apr-19	Monthly Deprec. & Accretion Exp.		(37,900)	(16,710)	54,609	37,900	16,710	(54,609)
May-19	Monthly Deprec. & Accretion Exp.		(37,900)	(16,769)	54,669	37,900	16,769	(54,669)
Jun-19	Monthly Deprec. & Accretion Exp.		(37,900)	(16,830)	54,729	37,900	16,830	(54,729)
Jul-19	Monthly Deprec. & Accretion Exp.		(37,900)	(16,890)	54,789	37,900	16,890	(54,789)

**GREEN ASH PONDS
UPDATED ARO CALCULATIONS BASED ON DECEMBER 2023 CLOSURE DATE**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
December 31, 2023	Estimated Retirement Date
8.7	No. of Years Until Retirement Obligation Settled
\$ 4,653,000	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,717,745	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 3,941,550	Present Value of Retirement Obligation
11.54%	Annual Depreciation Rate

Sum of (1)'s = \$ 303,196 2015 Depreciation Expense
Sum of (2)'s = \$ 114,418 2015 Accretion Expense

Acct. Description:
Account No.:

	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
	101.xxx Dr./Cr.)	108.xxx Dr./Cr.)	230.xxx Dr./Cr.)	182.3xx Dr./Cr.)	403.8xx Dr./Cr.)	411.10x Dr./Cr.)	407.4xx Dr./Cr.)
Aug-19	Monthly Deprec. & Accretion Exp.	(37,900)	(16,950)	54,850	37,900	16,950	(54,850)
Sep-19	Monthly Deprec. & Accretion Exp.	(37,900)	(17,011)	54,911	37,900	17,011	(54,911)
Oct-19	Monthly Deprec. & Accretion Exp.	(37,900)	(17,072)	54,972	37,900	17,072	(54,972)
Nov-19	Monthly Deprec. & Accretion Exp.	(37,900)	(17,133)	55,033	37,900	17,133	(55,033)
Dec-19	Monthly Deprec. & Accretion Exp.	(37,900)	(17,195)	55,094	37,900	17,195	(55,094)
Jan-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,256)	55,156	37,900	17,256	(55,156)
Feb-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,318)	55,218	37,900	17,318	(55,218)
Mar-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,380)	55,280	37,900	17,380	(55,280)
Apr-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,442)	55,342	37,900	17,442	(55,342)
May-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,505)	55,404	37,900	17,505	(55,404)
Jun-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,568)	55,467	37,900	17,568	(55,467)
Jul-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,631)	55,530	37,900	17,631	(55,530)
Aug-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,694)	55,593	37,900	17,694	(55,593)
Sep-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,757)	55,657	37,900	17,757	(55,657)
Oct-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,821)	55,720	37,900	17,821	(55,720)
Nov-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,885)	55,784	37,900	17,885	(55,784)
Dec-20	Monthly Deprec. & Accretion Exp.	(37,900)	(17,949)	55,848	37,900	17,949	(55,848)
Jan-21	Monthly Deprec. & Accretion Exp.	(37,900)	(18,013)	55,913	37,900	18,013	(55,913)
Feb-21	Monthly Deprec. & Accretion Exp.	(37,900)	(18,078)	55,977	37,900	18,078	(55,977)
Mar-21	Monthly Deprec. & Accretion Exp.	(37,900)	(18,142)	56,042	37,900	18,142	(56,042)
Apr-21	Monthly Deprec. & Accretion Exp.	(37,900)	(18,207)	56,107	37,900	18,207	(56,107)
May-21	Monthly Deprec. & Accretion Exp.	(37,900)	(18,273)	56,172	37,900	18,273	(56,172)
Jun-21	Monthly Deprec. & Accretion Exp.	(37,900)	(18,338)	56,238	37,900	18,338	(56,238)
Jul-21	Monthly Deprec. & Accretion Exp.	(37,900)	(18,404)	56,303	37,900	18,404	(56,303)
Aug-21	Monthly Deprec. & Accretion Exp.	(37,900)	(18,470)	56,369	37,900	18,470	(56,369)
Sep-21	Monthly Deprec. & Accretion Exp.	(37,900)	(18,536)	56,436	37,900	18,536	(56,436)

**GREEN ASH PONDS
UPDATED ARO CALCULATIONS BASED ON DECEMBER 2023 CLOSURE DATE**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
December 31, 2023	Estimated Retirement Date
8.7	No. of Years Until Retirement Obligation Settled
\$ 4,653,000	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,717,745	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 3,941,550	Present Value of Retirement Obligation
11.54%	Annual Depreciation Rate

Sum of (1)'s = \$ 303,196 2015 Depreciation Expense
Sum of (2)'s = \$ 114,418 2015 Accretion Expense

		BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
<i>Acct. Description:</i>		Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
<i>Account No.:</i>		101.xxx	108.xxx	230.xxx	182.3xx	403.8xx	411.10x	407.4xx
		Dr./Cr.	Dr./Cr.	Dr./Cr.	Dr./Cr.	Dr./Cr.	Dr./Cr.	Dr./Cr.
Oct-21	Monthly Deprec. & Accretion Exp.		(37,900)	(18,602)	56,502	37,900	18,602	(56,502)
Nov-21	Monthly Deprec. & Accretion Exp.		(37,900)	(18,669)	56,569	37,900	18,669	(56,569)
Dec-21	Monthly Deprec. & Accretion Exp.		(37,900)	(18,736)	56,635	37,900	18,736	(56,635)
Jan-22	Monthly Deprec. & Accretion Exp.		(37,900)	(18,803)	56,703	37,900	18,803	(56,703)
Feb-22	Monthly Deprec. & Accretion Exp.		(37,900)	(18,870)	56,770	37,900	18,870	(56,770)
Mar-22	Monthly Deprec. & Accretion Exp.		(37,900)	(18,938)	56,838	37,900	18,938	(56,838)
Apr-22	Monthly Deprec. & Accretion Exp.		(37,900)	(19,006)	56,905	37,900	19,006	(56,905)
May-22	Monthly Deprec. & Accretion Exp.		(37,900)	(19,074)	56,974	37,900	19,074	(56,974)
Jun-22	Monthly Deprec. & Accretion Exp.		(37,900)	(19,142)	57,042	37,900	19,142	(57,042)
Jul-22	Monthly Deprec. & Accretion Exp.		(37,900)	(19,211)	57,111	37,900	19,211	(57,111)
Aug-22	Monthly Deprec. & Accretion Exp.		(37,900)	(19,280)	57,179	37,900	19,280	(57,179)
Sep-22	Monthly Deprec. & Accretion Exp.		(37,900)	(19,349)	57,248	37,900	19,349	(57,248)
Oct-22	Monthly Deprec. & Accretion Exp.		(37,900)	(19,418)	57,318	37,900	19,418	(57,318)
Nov-22	Monthly Deprec. & Accretion Exp.		(37,900)	(19,488)	57,387	37,900	19,488	(57,387)
Dec-22	Monthly Deprec. & Accretion Exp.		(37,900)	(19,558)	57,457	37,900	19,558	(57,457)
Jan-23	Monthly Deprec. & Accretion Exp.		(37,900)	(19,628)	57,527	37,900	19,628	(57,527)
Feb-23	Monthly Deprec. & Accretion Exp.		(37,900)	(19,698)	57,598	37,900	19,698	(57,598)
Mar-23	Monthly Deprec. & Accretion Exp.		(37,900)	(19,769)	57,668	37,900	19,769	(57,668)
Apr-23	Monthly Deprec. & Accretion Exp.		(37,900)	(19,840)	57,739	37,900	19,840	(57,739)
May-23	Monthly Deprec. & Accretion Exp.		(37,900)	(19,911)	57,810	37,900	19,911	(57,810)
Jun-23	Monthly Deprec. & Accretion Exp.		(37,900)	(19,982)	57,881	37,900	19,982	(57,881)
Jul-23	Monthly Deprec. & Accretion Exp.		(37,900)	(20,054)	57,953	37,900	20,054	(57,953)
Aug-23	Monthly Deprec. & Accretion Exp.		(37,900)	(20,125)	58,025	37,900	20,125	(58,025)
Sep-23	Monthly Deprec. & Accretion Exp.		(37,900)	(20,198)	58,097	37,900	20,198	(58,097)
Oct-23	Monthly Deprec. & Accretion Exp.		(37,900)	(20,270)	58,169	37,900	20,270	(58,169)
Nov-23	Monthly Deprec. & Accretion Exp.		(37,900)	(20,343)	58,242	37,900	20,343	(58,242)

GREEN ASH PONDS
UPDATED ARO CALCULATIONS BASED ON DECEMBER 2023 CLOSURE DATE

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
December 31, 2023	Estimated Retirement Date
8.7	No. of Years Until Retirement Obligation Settled
\$ 4,653,000	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 5,717,745	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 3,941,550	Present Value of Retirement Obligation
11.54%	Annual Depreciation Rate

Sum of (1)'s = \$ 303,196 2015 Depreciation Expense

Sum of (2)'s = \$ 114,418 2015 Accretion Expense

Acct. Description:
Account No.:

Dec-23

Monthly Deprec. & Accretion Exp.

Ending Balances (before settlement)

BALANCE SHEET ACCOUNTS			
Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO
101.xxx	108.xxx	230.xxx	182.3xxx
<small>Dr./Cr.</small>	<small>Dr./Cr.</small>	<small>Dr./Cr.</small>	<small>Dr./Cr.</small>
	(37,900)	(20,415)	58,315
\$ 3,941,550	\$ (3,941,550)	\$ (5,717,745)	\$ 5,717,745

INCOME STATEMENT ACCOUNTS		
Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
403.8xx	411.10x	407.4xx
<small>Dr./Cr.</small>	<small>Dr./Cr.</small>	<small>Dr./Cr.</small>
37,900	20,415	(58,315)
\$ 3,941,550	\$ 1,776,196	\$ (5,717,745)

**STATION TWO ASH PONDS
UPDATED ARO CALCULATIONS BASED ON DECEMBER 2023 CLOSURE DATE**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
December 31, 2023	Estimated Retirement Date
8.7	No. of Years Until Retirement Obligation Settled
\$ 3,346,268	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 4,111,994	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,834,619	Present Value of Retirement Obligation
11.54%	Annual Depreciation Rate

Sum of (1)'s = \$ 218,048 2015 Depreciation Expense
Sum of (2)'s = \$ 82,286 2015 Accretion Expense

Acct. Description: Account No.:	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO 101.xxx Dr./(Cr.)	Accum. Deprec. - ARO 108.xxx Dr./(Cr.)	Liability - ARO 230.xxx Dr./(Cr.)	Regulatory Asset - ARO 182.3xx Dr./(Cr.)	Depreciation Expense - ARO 403.8xx Dr./(Cr.)	Accretion Expense - ARO 411.10x Dr./(Cr.)	Regulatory Credit 407.4xx Dr./(Cr.)
May-15 Entry to be Made Dec-15 for Initial ARO Balances	\$ 2,834,619	\$ -	\$ (2,834,619)	\$ -	\$ -	\$ -	\$ -
May-15 Monthly Deprec. & Accretion Exp.		(27,256)	(10,157)	37,413	27,256 (1)	10,157 (2)	(37,413)
Jun-15 Monthly Deprec. & Accretion Exp.		(27,256)	(10,194)	37,450	27,256	10,194	(37,450)
Jul-15 Monthly Deprec. & Accretion Exp.		(27,256)	(10,230)	37,486	27,256	10,230	(37,486)
Aug-15 Monthly Deprec. & Accretion Exp.		(27,256)	(10,267)	37,523	27,256	10,267	(37,523)
Sep-15 Monthly Deprec. & Accretion Exp.		(27,256)	(10,304)	37,560	27,256	10,304	(37,560)
Oct-15 Monthly Deprec. & Accretion Exp.		(27,256)	(10,341)	37,597	27,256	10,341	(37,597)
Nov-15 Monthly Deprec. & Accretion Exp.		(27,256)	(10,378)	37,634	27,256	10,378	(37,634)
Dec-15 Monthly Deprec. & Accretion Exp.		(27,256)	(10,415)	37,671	27,256	10,415	(37,671)
Jan-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,452)	37,708	27,256	10,452	(37,708)
Feb-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,490)	37,746	27,256	10,490	(37,746)
Mar-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,527)	37,783	27,256	10,527	(37,783)
Apr-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,565)	37,821	27,256	10,565	(37,821)
May-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,603)	37,859	27,256	10,603	(37,859)
Jun-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,641)	37,897	27,256	10,641	(37,897)
Jul-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,679)	37,935	27,256	10,679	(37,935)
Aug-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,717)	37,973	27,256	10,717	(37,973)
Sep-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,756)	38,012	27,256	10,756	(38,012)
Oct-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,794)	38,050	27,256	10,794	(38,050)
Nov-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,833)	38,089	27,256	10,833	(38,089)
Dec-16 Monthly Deprec. & Accretion Exp.		(27,256)	(10,872)	38,128	27,256	10,872	(38,128)
Jan-17 Monthly Deprec. & Accretion Exp.		(27,256)	(10,911)	38,167	27,256	10,911	(38,167)
Feb-17 Monthly Deprec. & Accretion Exp.		(27,256)	(10,950)	38,206	27,256	10,950	(38,206)
Mar-17 Monthly Deprec. & Accretion Exp.		(27,256)	(10,989)	38,245	27,256	10,989	(38,245)
Apr-17 Monthly Deprec. & Accretion Exp.		(27,256)	(11,028)	38,284	27,256	11,028	(38,284)
May-17 Monthly Deprec. & Accretion Exp.		(27,256)	(11,068)	38,324	27,256	11,068	(38,324)
Jun-17 Monthly Deprec. & Accretion Exp.		(27,256)	(11,108)	38,363	27,256	11,108	(38,363)

**STATION TWO ASH PONDS
UPDATED ARO CALCULATIONS BASED ON DECEMBER 2023 CLOSURE DATE**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
December 31, 2023	Estimated Retirement Date
8.7	No. of Years Until Retirement Obligation Settled
\$ 3,346,268	Estimated Cost of Retirement Obligation (Today's Dollars)
2.38%	Annual Inflation Rate (Historical Average 1995 - 2014)
\$ 4,111,994	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,834,619	Present Value of Retirement Obligation
11.54%	Annual Depreciation Rate

Sum of (1)'s = \$ 218,048 2015 Depreciation Expense
Sum of (2)'s = \$ 82,286 2015 Accretion Expense

Acct. Description: Account No.:	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO 101.xxx Dr./Cr.	Accum. Deprec. - ARO 108.xxx Dr./Cr.	Liability - ARO 230.xxx Dr./Cr.	Regulatory Asset - ARO 182.3xx Dr./Cr.	Depreciation Expense - ARO 403.8xx Dr./Cr.	Accretion Expense - ARO 411.10x Dr./Cr.	Regulatory Credit 407.4xx Dr./Cr.
Jul-17	Monthly Deprec. & Accretion Exp.	(27,256)	(11,147)	38,403	27,256	11,147	(38,403)
Aug-17	Monthly Deprec. & Accretion Exp.	(27,256)	(11,187)	38,443	27,256	11,187	(38,443)
Sep-17	Monthly Deprec. & Accretion Exp.	(27,256)	(11,227)	38,483	27,256	11,227	(38,483)
Oct-17	Monthly Deprec. & Accretion Exp.	(27,256)	(11,268)	38,524	27,256	11,268	(38,524)
Nov-17	Monthly Deprec. & Accretion Exp.	(27,256)	(11,308)	38,564	27,256	11,308	(38,564)
Dec-17	Monthly Deprec. & Accretion Exp.	(27,256)	(11,349)	38,604	27,256	11,349	(38,604)
Jan-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,389)	38,645	27,256	11,389	(38,645)
Feb-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,430)	38,686	27,256	11,430	(38,686)
Mar-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,471)	38,727	27,256	11,471	(38,727)
Apr-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,512)	38,768	27,256	11,512	(38,768)
May-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,553)	38,809	27,256	11,553	(38,809)
Jun-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,595)	38,851	27,256	11,595	(38,851)
Jul-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,636)	38,892	27,256	11,636	(38,892)
Aug-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,678)	38,934	27,256	11,678	(38,934)
Sep-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,720)	38,976	27,256	11,720	(38,976)
Oct-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,762)	39,018	27,256	11,762	(39,018)
Nov-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,804)	39,060	27,256	11,804	(39,060)
Dec-18	Monthly Deprec. & Accretion Exp.	(27,256)	(11,846)	39,102	27,256	11,846	(39,102)
Jan-19	Monthly Deprec. & Accretion Exp.	(27,256)	(11,889)	39,145	27,256	11,889	(39,145)
Feb-19	Monthly Deprec. & Accretion Exp.	(27,256)	(11,931)	39,187	27,256	11,931	(39,187)
Mar-19	Monthly Deprec. & Accretion Exp.	(27,256)	(11,974)	39,230	27,256	11,974	(39,230)
Apr-19	Monthly Deprec. & Accretion Exp.	(27,256)	(12,017)	39,273	27,256	12,017	(39,273)
May-19	Monthly Deprec. & Accretion Exp.	(27,256)	(12,060)	39,316	27,256	12,060	(39,316)
Jun-19	Monthly Deprec. & Accretion Exp.	(27,256)	(12,103)	39,359	27,256	12,103	(39,359)
Jul-19	Monthly Deprec. & Accretion Exp.	(27,256)	(12,147)	39,403	27,256	12,147	(39,403)
Aug-19	Monthly Deprec. & Accretion Exp.	(27,256)	(12,190)	39,446	27,256	12,190	(39,446)
Sep-19	Monthly Deprec. & Accretion Exp.	(27,256)	(12,234)	39,490	27,256	12,234	(39,490)

**STATION TWO ASH PONDS
UPDATED ARO CALCULATIONS BASED ON DECEMBER 2023 CLOSURE DATE**

Assumptions:

May 1, 2015	Valuation Date
December 31, 2015	Initial Accounting Date
December 31, 2023	Estimated Retirement Date
8.7	No. of Years Until Retirement Obligation Settled
\$ 3,346,268	Estimated Cost of Retirement Obligation (Today's Dollars)
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\$ 4,111,994	Future Value of Retirement Obligation
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\$ 2,834,619	Present Value of Retirement Obligation
11.54%	Annual Depreciation Rate

Sum of (1)'s = \$ 218,048 2015 Depreciation Expense
Sum of (2)'s = \$ 82,286 2015 Accretion Expense

Acct. Description:
Account No.:

	BALANCE SHEET ACCOUNTS				INCOME STATEMENT ACCOUNTS		
	Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO	Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
	101.xxx Dr./Cr.	108.xxx Dr./Cr.	230.xxx Dr./Cr.	182.3xx Dr./Cr.	403.8xx Dr./Cr.	411.10x Dr./Cr.	407.4xx Dr./Cr.
Oct-19	Monthly Deprec. & Accretion Exp.	(27,256)	(12,278)	39,534	27,256	12,278	(39,534)
Nov-19	Monthly Deprec. & Accretion Exp.	(27,256)	(12,322)	39,578	27,256	12,322	(39,578)
Dec-19	Monthly Deprec. & Accretion Exp.	(27,256)	(12,366)	39,622	27,256	12,366	(39,622)
Jan-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,410)	39,666	27,256	12,410	(39,666)
Feb-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,455)	39,710	27,256	12,455	(39,710)
Mar-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,499)	39,755	27,256	12,499	(39,755)
Apr-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,544)	39,800	27,256	12,544	(39,800)
May-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,589)	39,845	27,256	12,589	(39,845)
Jun-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,634)	39,890	27,256	12,634	(39,890)
Jul-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,679)	39,935	27,256	12,679	(39,935)
Aug-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,725)	39,981	27,256	12,725	(39,981)
Sep-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,770)	40,026	27,256	12,770	(40,026)
Oct-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,816)	40,072	27,256	12,816	(40,072)
Nov-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,862)	40,118	27,256	12,862	(40,118)
Dec-20	Monthly Deprec. & Accretion Exp.	(27,256)	(12,908)	40,164	27,256	12,908	(40,164)
Jan-21	Monthly Deprec. & Accretion Exp.	(27,256)	(12,954)	40,210	27,256	12,954	(40,210)
Feb-21	Monthly Deprec. & Accretion Exp.	(27,256)	(13,001)	40,257	27,256	13,001	(40,257)
Mar-21	Monthly Deprec. & Accretion Exp.	(27,256)	(13,047)	40,303	27,256	13,047	(40,303)
Apr-21	Monthly Deprec. & Accretion Exp.	(27,256)	(13,094)	40,350	27,256	13,094	(40,350)
May-21	Monthly Deprec. & Accretion Exp.	(27,256)	(13,141)	40,397	27,256	13,141	(40,397)
Jun-21	Monthly Deprec. & Accretion Exp.	(27,256)	(13,188)	40,444	27,256	13,188	(40,444)
Jul-21	Monthly Deprec. & Accretion Exp.	(27,256)	(13,235)	40,491	27,256	13,235	(40,491)
Aug-21	Monthly Deprec. & Accretion Exp.	(27,256)	(13,283)	40,539	27,256	13,283	(40,539)
Sep-21	Monthly Deprec. & Accretion Exp.	(27,256)	(13,330)	40,586	27,256	13,330	(40,586)
Oct-21	Monthly Deprec. & Accretion Exp.	(27,256)	(13,378)	40,634	27,256	13,378	(40,634)
Nov-21	Monthly Deprec. & Accretion Exp.	(27,256)	(13,426)	40,682	27,256	13,426	(40,682)
Dec-21	Monthly Deprec. & Accretion Exp.	(27,256)	(13,474)	40,730	27,256	13,474	(40,730)

**STATION TWO ASH PONDS
UPDATED ARO CALCULATIONS BASED ON DECEMBER 2023 CLOSURE DATE**

Assumptions:

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December 31, 2015	Initial Accounting Date
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\$ 4,111,994	Future Value of Retirement Obligation
4.30%	Interest/ Discount Rate
\$ 2,834,619	Present Value of Retirement Obligation
11.54%	Annual Depreciation Rate

Sum of (1)'s = \$ 218,048 2015 Depreciation Expense
Sum of (2)'s = \$ 82,286 2015 Accretion Expense

Acct. Description:
Account No.:

BALANCE SHEET ACCOUNTS			
Plant In Service - ARO	Accum. Deprec. - ARO	Liability - ARO	Regulatory Asset - ARO
101.xxxx	108.xxxx	230.xxxx	182.3xxx
Dr./Cr.	Dr./Cr.	Dr./Cr.	Dr./Cr.
	(27,256)	(13,523)	40,778
	(27,256)	(13,571)	40,827
	(27,256)	(13,620)	40,876
	(27,256)	(13,668)	40,924
	(27,256)	(13,717)	40,973
	(27,256)	(13,767)	41,022
	(27,256)	(13,816)	41,072
	(27,256)	(13,865)	41,121
	(27,256)	(13,915)	41,171
	(27,256)	(13,965)	41,221
	(27,256)	(14,015)	41,271
	(27,256)	(14,065)	41,321
	(27,256)	(14,116)	41,372
	(27,256)	(14,166)	41,422
	(27,256)	(14,217)	41,473
	(27,256)	(14,268)	41,524
	(27,256)	(14,319)	41,575
	(27,256)	(14,370)	41,626
	(27,256)	(14,422)	41,678
	(27,256)	(14,473)	41,729
	(27,256)	(14,525)	41,781
	(27,256)	(14,577)	41,833
	(27,256)	(14,630)	41,886
	(27,256)	(14,682)	41,938
Ending Balances (before settlement)	\$ (2,834,619)	\$ (4,111,994)	\$ 4,111,994

INCOME STATEMENT ACCOUNTS		
Depreciation Expense - ARO	Accretion Expense - ARO	Regulatory Credit
403.8xxx	411.10x	407.4xx
Dr./Cr.	Dr./Cr.	Dr./Cr.
27,256	13,523	(40,778)
27,256	13,571	(40,827)
27,256	13,620	(40,876)
27,256	13,668	(40,924)
27,256	13,717	(40,973)
27,256	13,767	(41,022)
27,256	13,816	(41,072)
27,256	13,865	(41,121)
27,256	13,915	(41,171)
27,256	13,965	(41,221)
27,256	14,015	(41,271)
27,256	14,065	(41,321)
27,256	14,116	(41,372)
27,256	14,166	(41,422)
27,256	14,217	(41,473)
27,256	14,268	(41,524)
27,256	14,319	(41,575)
27,256	14,370	(41,626)
27,256	14,422	(41,678)
27,256	14,473	(41,729)
27,256	14,525	(41,781)
27,256	14,577	(41,833)
27,256	14,630	(41,886)
27,256	14,682	(41,938)
\$ 2,834,619	\$ 1,277,375	\$ (4,111,994)

Big Rivers' Share of Station Two Ash Pond Closure Costs

Fiscal Year	STATION TWO MW CAPACITY RESERVATIONS		
	Big Rivers' Share	City's Share	Total Station Two
6/01/73 - 5/31/74	162	13	175
6/01/74 - 5/31/75	283	17	300
6/01/75 - 5/31/76	271	18	289
6/01/76 - 5/31/77	267	22	289
6/01/77 - 5/31/78	262	27	289
6/01/78 - 5/31/79	262	34	296
6/01/79 - 5/31/80	256	41	297
6/01/80 - 5/31/81	256	40	296
6/01/81 - 5/31/82	253	43	296
6/01/82 - 5/31/83	253	43	296
6/01/83 - 5/31/84	270	45	315
6/01/84 - 5/31/85	268	47	315
6/01/85 - 5/31/86	271	44	315
6/01/86 - 5/31/87	271	44	315
6/01/87 - 5/31/88	270	45	315
6/01/88 - 5/31/89	269	46	315
6/01/89 - 5/31/90	264	51	315
6/01/90 - 5/31/91	264	51	315
6/01/91 - 5/31/92	263	52	315
6/01/92 - 5/31/93	262	53	315
6/01/93 - 5/31/94	261	54	315
6/01/94 - 5/31/95	258	57	315
6/01/95 - 5/31/96	250	62	312
6/01/96 - 5/31/97	250	62	312
6/01/97 - 5/31/98	247	65	312
6/01/98 - 5/31/99	246	66	312
6/01/99 - 5/31/00	232	80	312
6/01/00 - 5/31/01	225	87	312
6/01/01 - 5/31/02	220	92	312
6/01/02 - 5/31/03	217	95	312
6/01/03 - 5/31/04	217	95	312
6/01/04 - 5/31/05	217	95	312
6/01/05 - 5/31/06	217	95	312
6/01/06 - 5/31/07	217	95	312
6/01/07 - 5/31/08	217	95	312
6/01/08 - 5/31/09	217	95	312
6/01/09 - 5/31/10	212	100	312
6/01/10 - 5/31/11	207	105	312
6/01/11 - 5/31/12	202	110	312
6/01/12 - 5/31/13	197	115	312
6/01/13 - 5/31/14	197	115	312
6/01/14 - 5/31/15	197	115	312
6/01/15 - 5/31/16	197	115	312
Total	10,314	2,841	13,155
% Allocation	78.40%	21.60%	100.00%

x Total Estimated Station Two Ash Pond Closure Costs (Current \$)	\$	4,268,000
Big Rivers' Share of Station Two Ash Pond Closure Costs	\$	3,346,268

Note: 1993 Amendments to Contracts among City of Henderson and Big Rivers: Sec. 8 - Station Two Decommissioning Costs "parties shall bear decommissioning costs of Station Two in the proportions in which they shared capacity costs during the life of Station Two."

Annual U.S. Inflation Rates

1995 - 2015

Source: <http://www.multpl.com/inflation/table>

Year	Annual Inflation
2014	1.58%
2013	1.59%
2012	2.93%
2011	1.63%
2010	2.63%
2009	0.03%
2008	4.28%
2007	2.08%
2006	3.99%
2005	2.97%
2004	1.93%
2003	2.60%
2002	1.14%
2001	3.73%
2000	2.74%
1999	1.67%
1998	1.57%
1997	3.04%
1996	2.73%
1995	2.80%

2.38% Average Annual Inflation (1995 - 2014)

**Big Rivers Electric Corporation
Summary of ARO Related Amounts
As Revised vs. Application**

	<u>Green</u>		<u>Station Two</u>		<u>Total</u>
REVISED AMOUNTS (BASED ON CHANGE IN EXPECTED CLOSURE DATES TO DEC. 2023):					
Initial ARO Liability (5/1/2015):	\$ 3,941,550	\$	2,834,619	\$	6,776,169
12/31/15 Regulatory Asset Balance:	\$ 417,615	\$	300,333	\$	717,948
12/31/15 ARO Liability Balance:	\$ 4,055,968	\$	2,916,904	\$	6,972,872
2015 Depreciation & Accretion:					
2015 - Depreciation Expense	\$ 303,196	\$	218,048	\$	521,244
2015 - Accretion Expense	\$ 114,418	\$	82,286	\$	196,704
2015 - Total Depreciation & Accretion Expense	\$ 417,615	\$	300,333	\$	717,948
Total Depreciation & Accretion:					
Total Depreciation Expense	\$ 3,941,550	\$	2,834,619	\$	6,776,169
Total Accretion Expense	\$ 1,776,196	\$	1,277,375	\$	3,053,571
Total Depreciation & Accretion Expense	\$ 5,717,745	\$	4,111,994	\$	9,829,739

Case No. 2015-00333

Attachment No. 8 of 8 for Response to Item 2

Witness: Nicholas R. Castlen

Page 1 of 3

**Big Rivers Electric Corporation
Summary of ARO Related Amounts
As Revised vs. Application**

ORIGINAL AMOUNTS PER APPLICATION (SUPERSEDED):

Initial ARO Liability (5/1/2015):	\$	2,938,770	\$	2,370,746	\$	5,309,516
12/31/15 Regulatory Asset Balance:	\$	166,941	\$	156,625	\$	323,567
12/31/15 ARO Liability Balance:	\$	3,024,079	\$	2,439,566	\$	5,463,645
2015 Depreciation & Accretion:						
2015 - Depreciation Expense	\$	81,632	\$	87,805	\$	169,438
2015 - Accretion Expense	\$	85,309	\$	68,820	\$	154,129
2015 - Total Depreciation & Accretion Expense	\$	166,941	\$	156,625	\$	323,567
Total Depreciation & Accretion:						
Total Depreciation Expense	\$	2,938,770	\$	2,370,746	\$	5,309,516
Total Accretion Expense	\$	5,294,197	\$	2,762,927	\$	8,057,124
Total Depreciation & Accretion Expense	\$	8,232,967	\$	5,133,673	\$	13,366,640

**Big Rivers Electric Corporation
Summary of ARO Related Amounts
As Revised vs. Application**

CHANGE (REVISED AMOUNTS vs. ORIGINAL AMOUNTS PER APPLICATION):

Initial ARO Liability (5/1/2015):	\$	1,002,780	\$	463,872	\$	1,466,652
12/31/15 Regulatory Asset Balance:	\$	250,673	\$	143,708	\$	394,381
12/31/15 ARO Liability Balance:	\$	1,031,889	\$	477,338	\$	1,509,228
2015 Depreciation & Accretion:						
2015 - Depreciation Expense	\$	221,564	\$	130,242	\$	351,806
2015 - Accretion Expense	\$	29,109	\$	13,466	\$	42,575
2015 - Total Depreciation & Accretion Expense	\$	250,673	\$	143,708	\$	394,381
Total Depreciation & Accretion:						
Total Depreciation Expense	\$	1,002,780	\$	463,872	\$	1,466,652
Total Accretion Expense	\$	(3,518,002)	\$	(1,485,552)	\$	(5,003,553)
Total Depreciation & Accretion Expense	\$	(2,515,222)	\$	(1,021,679)	\$	(3,536,901)

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

- 1 **Item 3)** *Refer to the Application, paragraph 10.*
2
3 *a. Explain how Big Rivers calculated the ARO-related*
4 *depreciation expense of \$5.310 million. Include any*
5 *relevant work papers, spreadsheets, etc., showing the*
6 *calculation of the \$5.310 million.*
7 *b. Explain how Big Rivers calculated the ARO-related*
8 *accretion expense of \$8.057 million. Include any relevant*
9 *work papers, spreadsheets, etc., showing the calculation*
10 *of the \$8.057 million.*
11 *c. Also refer to the Application, paragraph 9, where it states*
12 *that the "ash pond closure costs are \$8.233 million for*
13 *Green and \$5.134 million for Big Rivers' share of Station*
14 *Two." Explain the difference in these amounts and the*
15 *\$5.310 million ARO-related depreciation expense and*
16 *\$8.057 ARO-related accretion expense referenced in*
17 *paragraph 10 of the Application. Include any relevant*
18 *work papers, spreadsheets, etc., showing the calculations.*

19

20 **Response)**

- 21 a. In accordance with the RUS USoA and ASC 410-20, an ARO
22 liability is initially recognized equal to the present value of the
23 future retirement obligation at the time the obligation is
24 incurred. An amount equal to the initial ARO liability balance

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 is capitalized on the company's balance sheet with the related
2 asset and depreciated over its remaining life. The present fair
3 values of the ARO liabilities for the Green and Station Two ash
4 ponds provided in Big Rivers' application were \$2.939 million
5 and \$2.371 million, respectively, totaling \$5.310 million. Based
6 on the initial present value of the ARO liability, calculated using
7 the information available at the time the application was
8 prepared, an equal amount of \$5.310 million would have been
9 capitalized and subsequently depreciated over the life of the
10 related assets. The calculations of the ARO-related depreciation
11 expense for the Green and Station Two ash ponds totaling
12 \$5.310 million, as provided in the application, are included in
13 Attachments No. 2 and No. 3 to the response for Item 2.

14 As discussed in the responses to Items 2.b. and 2.e. – f.,
15 the ARO-related amounts provided in Big Rivers' application in
16 this case were revised based on changes to the expected closure
17 dates of the Green and Station Two ash ponds due to the
18 recently issued Effluent Limitation Guidelines for Steam
19 Electric Power (ELG). Based on the current expected closure
20 date of December 2023 for both ash ponds, the total ARO-related
21 depreciation expense that will be recognized over the remaining
22 life of the related assets is now \$6.776 million. Please see
23 Attachments No. 4 and No. 5 to the response to Item 2 for the

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 updated calculations of the ARO-related depreciation expense
2 for the Green and Station Two ash ponds, respectively.

3 b. A recent study performed by Burns & McDonnell of Big Rivers'
4 obligations surrounding the eventual closures of its ash ponds
5 provided estimates of the current costs to close the Green and
6 Station Two ash ponds, in today's dollars, which were estimated
7 to be \$4.653 million for Green and \$3.346 million for Big Rivers'
8 share of Station Two.

9 Using the current cost estimates provided by the Burns
10 & McDonnell study, the estimated retirement dates for the
11 respective units per Big Rivers' 2012 Depreciation Study (May
12 2039 for Green and May 2033 for Station Two), and an annual
13 inflation rate of 2.38%⁴, Big Rivers calculated the estimated
14 future value of the retirement obligations for closing the ash
15 ponds to be \$13.367 million (consisting of \$8.233 million for
16 Green and \$5.134 million for its share of Station Two).

17 Using a discount rate of 4.30%, Big Rivers then
18 calculated the present value of the ARO liabilities as of May
19 2015 to be \$5.310 million (consisting of \$2.939 million for the
20 Green ash pond and \$2.371 million for the Station Two ash
21 pond). Accordingly, the initial ARO liability recognized would
22 have been \$5.310 million. The initial ARO liability of \$5.310

⁴ See Attachment No. 7 to the response to Item 2 for the calculation of the annual inflation rate used.

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 million would have increased to the projected future value of the
2 retirement costs (\$13.367 million) through the monthly accretion
3 over the remaining life of the related asset. The \$8.057 million
4 represents the total accretion expense that would have been
5 recognized over the remaining life of the related asset to
6 increase the value of the liability to the projected future costs
7 [i.e. \$13.367 million (future value) *minus* \$5.310 million (present
8 value) *equals* \$8.057 million (total accretion expense)].

9 As discussed in the responses to Items 2.b. and 2.e. – f.,
10 the ARO-related amounts provided in Big Rivers' application in
11 this case were revised based on changes to the expected closure
12 dates of the Green and Station Two ash ponds due to the
13 recently issued Effluent Limitation Guidelines for Steam
14 Electric Power (ELG). Based on the changes to the expected ash
15 pond closure dates, the initial ARO liability balance as of May
16 2015 is \$6.776 million (\$3.941 for Green and \$2.835 million for
17 Big Rivers' share of Station Two), and the future value of the
18 Green and Station Two ash pond closure costs is \$9.830 million
19 (\$5.718 million for Green and \$4.112 million for Big Rivers'
20 share of Station Two). Based on the revised calculations, the
21 total accretion expense to be recognized over the remaining life
22 of the ash ponds is now \$3.054 million. Please see Attachments
23 No. 4 and No. 5 to the response to Item 2 for the updated

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 calculations of the ARO-related accretion expense for the Green
2 and Station Two ash ponds, respectively.

3 c. The total ash pond closure costs of \$13.367 million (i.e. \$8.233
4 million for Green plus \$5.134 million for Big Rivers' share of
5 Station Two), provided in paragraph 9 of the application,
6 represent the future values of the AROs (i.e. the total expected
7 cost of the retirement obligations in future dollars).

8 The total projected cost, or future value, of the
9 retirement obligations are recognized over the remaining lives of
10 the related asset through the recognition of depreciation expense
11 on the capitalized balance and accretion expense on the ARO
12 liability balance. Accordingly, the sum of the ARO-related
13 depreciation expense (\$5.310 million) and the ARO-related
14 accretion expense (\$8.057 million), provided in paragraph 10 of
15 the application, equals the total ash pond closure costs of
16 \$13.367 million provided in paragraph 9 of the application.
17 Please see Attachments 2 and 3 to the response to Item 2 for the
18 calculations of the total ash pond closure costs, ARO-related
19 depreciation, and ARO-related accretion amounts provided in
20 the application for Green and Big Rivers' share of Station Two,
21 respectively.

22 As discussed in the responses to Items 2.b. and 2.e. – f.,
23 the ARO-related amounts provided in Big Rivers' application in
24 this case were revised based on changes to the expected closure

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333

Response to Commission Staff's Initial Request for Information
dated October 26, 2015

November 5, 2015

1 dates of the Green and Station Two ash ponds due to the
2 recently issued Effluent Limitation Guidelines for Steam
3 Electric Power (ELG). Based on the changes to the expected ash
4 pond closure dates, the total projected cost (i.e. future value) of
5 the AROs is now \$9.830 million (\$5.718 million for Green plus
6 \$4.112 million for Big Rivers' share of Station Two). The total
7 projected cost of \$9.830 million will be recognized over the life of
8 the related assets through depreciation expense of \$6.776
9 million and accretion expense of \$3.054 million. Please see
10 Attachments No. 4 and No. 5 to the response to Item 2 for the
11 revised calculations of the total ash pond closure costs, ARO-
12 related depreciation, and ARO-related accretion amounts for
13 Green and Big Rivers' share of Station Two, respectively.

14 The electronic version of the Attachments referenced in
15 this response is contained on the electronic media accompanying
16 these responses.

17
18
19 **Witness)** Nicholas R. Castlen

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

- 1 **Item 4)** *Refer to the Application, paragraph 12.*
2
3 *a. Explain in detail the engineering studies, estimated to*
4 *cost between \$700,000 and \$1 million, that Big Rivers must*
5 *conduct on the Wilson, Green, Station Two and Coleman*
6 *ash ponds and landfills.*
7 *b. Describe how CCR material is currently stored at the*
8 *Wilson Station.*
9 *c. Describe the project to "containerize CCR piles at Wilson*
10 *Station."*
11 *d. It is stated that estimated cost to be incurred in 2015 for*
12 *the analysis of the Green and Station Two ash ponds is*
13 *\$100,000 for each ash pond.*
14 *(1) How many ponds are at each site?*
15 *(2) Has the installation of the piezometers and ground*
16 *water wells begun, or if not, when will installation*
17 *occur?*
18 *(3) Is this a one-time expense, or will there be on-going*
19 *expenses each year?*
20 *(4) Is Big Rivers requesting deferral for these expenses?*

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22
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24

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 **Response)**

- 2 a. The CCR rule requires the following studies to be completed for
3 landfills:
- 4 i. Location Restrictions including placement above the
5 uppermost aquifer, wetlands, fault areas, seismic impact
6 zones and unstable areas 40 CFR 257.60 – 257.64;
 - 7 ii. Floodplain determination 40 CFR 257.64;
 - 8 iii. Endangered Species 40 CFR 257.3-1;
 - 9 iv. Design Requirements for Composite Liner and Leachate
10 Collection and Removal System 40 CFR 257.70 (b&c) (d);
 - 11 v. Groundwater monitoring and corrective action 40 CFR
12 257.90 – 257.98;
 - 13 vi. Annual inspections 40 CFR 257.84(a);
 - 14 vii. Fugitive dust controls 40 CFR 257.84(b);
 - 15 viii. Run-on, Run-off controls 40 CFR 257.81;
 - 16 ix. Surface water protection 40CFR 257.81;
 - 17 x. Closure Requirements 40 CFR 257.100 – 257.103; and
 - 18 xi. Post closure care 40 CFR 257.104.

19
20 The CCR rule requires the following studies to be completed for
21 surface impoundments:

- 22 i. Location restrictions 40 CFR 257.60 – 257.64;
- 23 ii. Floodplains 40 CFR 257.64;
- 24 iii. Endangered species 40 CFR 257.3-2;

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

- 1 iv. Design requirements 40 CFR 257.71;
- 2 v. Groundwater monitoring and corrective action 40 CFR
- 3 257.90 – 257.98;
- 4 vi. Structural integrity criteria 40 CFR 257.73 & 257.83;
- 5 vii. Hazard potential classification assessments 40 CFR 257.73
- 6 (a)(2);
- 7 viii. Structural stability assessments 40 CFR 257.73 (d);
- 8 ix. Safety factor assessments 40 CFR 257.73 (e);
- 9 x. Emergency action plan 40 CFR 257.73 (a)(3);
- 10 xi. Annual inspections 40 CFR 257.83 (b);
- 11 xii. Fugitive dust controls 40 CFR 257.80;
- 12 xiii. Hydrologic & hydraulic capacity requirements 40 CFR
- 13 257.82;
- 14 xiv. Surface water protection 40 CFR 257.3-3;
- 15 xv. Closure requirements 40 CFR 257.100 – 257.103.
- 16 b. CCRs are placed in the onsite Special Waste Landfill.
- 17 c. The stack-out area for the loading of the poz-o-tec to be trans-
- 18 ported to the onsite landfill did not have an impervious base as
- 19 defined in the regulations. The corrective action to meet the
- 20 definition of an impervious base was to construct a concrete pad
- 21 to stack the poz-o-tec on during the loading process.
- 22 d.
- 23 (1) There are two bottom ash ponds onsite – one for Green
- 24 Station and one for Henderson Station II.

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR AUTHORITY TO ESTABLISH REGULATORY ASSETS FOR EXPENSES RELATED TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

- 1 (2) Big Rivers has installed the piezometers to determine the
- 2 ground water flow. Big Rivers expects the installation of
- 3 the ground water monitoring wells to be completed by the
- 4 end of this year.
- 5 (3) Big Rivers expects the installation of piezometers and
- 6 ground water monitoring wells to be a one-time expense.
- 7 (4) Yes.
- 8
- 9
- 10 **Witness)** Eric M. Robeson

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 **Item 5)** *Refer to the application, paragraph 17. Confirm that the*
2 *absolute latest date that the Commission could issue an Order that would*
3 *allow Big Rivers to record the proposed regulatory asset entries is*
4 *January 5, 2016.*

5
6 **Response)** Big Rivers strives to close its books for the prior month-end no later
7 than the 15th of each subsequent month. This allows Big Rivers' staff time to
8 prepare and distribute internal and external reports and documents, including the
9 monthly Fuel Adjustment Clause and Environmental Surcharge filings, in a
10 timely manner. While Big Rivers could meet the December 2015 month-end
11 closing target of January 15, 2016, if it receives the Commission's order by
12 January 13, 2016, Big Rivers desires to have an order by the earlier January 5
13 date to allow time (i) for any unexpected accounting entries and approvals which
14 might arise from the Commission's order, and (ii) to seek clarification from
15 Commission Staff regarding any language in that order.

16
17

18 **Witness)** Nicholas R. Castlen

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 **Item 6)** *Have there been any citations, violations, notices, litigation,*
2 *etc., from/with any environmental agency regarding the ash ponds at*
3 *Green and Station Two over the past ten years? If so, identify and explain*
4 *each incident and provide any relevant information regarding each*
5 *incident.*

6
7 **Response)** Since acquiring operational control of the power plants on
8 consummation of the Unwind Transaction in 2009, Big Rivers has not received
9 any Notices of Violations ("NOVs") from the Kentucky Energy and Environment
10 Cabinet, Department for Environmental Protection, Division of Enforcement
11 ("KEEC-EP"). Prior to that event, any NOVs were the responsibility of Western
12 Kentucky Energy, Inc ("WKE").

13 Three NOVs were issued to WKE in the past ten years. The predecessor of
14 the KEEC-EP issued an NOV on January 6, 2005, for exceeding the monthly Total
15 Suspended Solids ("TSS") and exceeding the pH limits on the Green Station ash
16 pond. The monthly TSS limit was 30 mg/l and the reported average was 44.7 mg/l.
17 The corrective action was to remove solids from directly in front of the discharge
18 structure. The pH issue was resolved by adjusting the sodium hydroxide feed to
19 the discharge clarifier.

20 KEEC-EP issued a second NOV on May 29, 2007, for exceeding TSS
21 average on the discharge of the Reid/Henderson ash pond. The permit limit for
22 the TSS monthly average was 30 mg/l and the reported monthly average was 46.0
23 mg/l. The corrective action was to add a polymer settling agent to increase the
24 settling rate within the ash pond and to remove approximately 30,000 yards of ash

BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC
CORPORATION FOR AUTHORITY TO ESTABLISH
REGULATORY ASSETS FOR EXPENSES RELATED
TO THE COAL COMBUSTION RESIDUALS RULE
CASE NO. 2015-00333**

**Response to Commission Staff's Initial Request for Information
dated October 26, 2015**

November 5, 2015

1 from the ash pond to increase the capacity of the pond as well as modify the
2 current dry fly ash system.

3 KEEC-EP issued a third NOV on February 27, 2008, for exceeding the TSS
4 limit for the Reid/Henderson ash pond in November. The permit limit for the TSS
5 monthly average was 30 mg/l and the reported monthly average was 38 mg/l. The
6 corrective action was to restart the polymer feed system.

7 These NOV's were issued during the time Big Rivers' generating units were
8 leased to affiliates of Louisville Gas and Electric Company.

9

10

11 Witness) Eric M. Robeson