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John J. Finnigan, Jr. Senior Counsel

VIA OVERNIGHT MAIL

January 27, 2006

Ms. Elizabeth O'Donnell Executive Director Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602-0615



JAN 3 0 2006



Re: In the Matter of an Adjustment of Gas Rates of The Union Light, Heat and Power

Company

Case No. 2005-00042

Dear Ms. O'Donnell:

I have attached the following workpapers supporting ULH&P's refund plan:

- 1. A two-page document explaining the assumptions and methodology for the refund calculations.
- 2. A one-page document containing examples of how the refund was calculated for individual accounts.
- 3. A one-page document detailing the refund amounts and number of refunds to be issued, by rate class, for the three months when ULH&P's proposed rates were in effect.
- 4. A series of three sample bills for a customer, showing how the old rates and the proposed rates were billed. Note that this example is not intended to show how the refund will be billed. We will show the refund on the customer's bill with a billing message indicating that this is a refund payment, per the Commission's order in Case No. 2005-00042.

One final note on these workpapers: our Rates Department used SAS software to calculate the refund. We cannot provide this by email because it is too large, but we can download this data into a CD. Note, however, that you will need the SAS software installed on your computer to be able to run the CD. We could copy the SAS information into Excel but this would just show raw data, without the formulas. If you want this CD, please let me know and we'll get it to you as soon as possible.

If you have any questions, please do not hesitate to contact me at (513) 287-3601.

Sincerely,

John J. Finnigan, Jr. Senior Counsel

JJF/sew

cc: Hon. Elizabeth E. Blackford (via overnight mail)

Assumptions And Methodology Used For The Union Light, Heat & Power Company Refund <u>Case No. 2005-00042</u>

The calculation of the refund amounts due to the customers of The Union Light, Heat & Power Company (Company) was based on the following assumptions and methodology:

Assumptions

No "adjustment" observations.

Interest Rate (based on the daily 90-day Commercial Paper Discount Rate) 4.28%.

Company Proposed Customer Charge – Residential (PCC) Company Proposed Energy Charge - Residential (PEC) KY. PSC Final Customer Charge – Residential (FCC) KY. PSC Final Energy Charge – Residential (FEC)	\$15.00. \$0.298534. \$12.00. \$0.268400.
Company Proposed Customer Charge – General Service (PCC) Company Proposed Energy Charge – General Service (PEC) KY. PSC Final Customer Charge – General Service (FCC) KY. PSC Final Energy Charge – General Service (FEC)	\$38.50. \$0.205400. \$30.00. \$0.210100.
Company Proposed Administrative Charge – Interruptible (PCC) Company Proposed Energy Charge – Interruptible (PEC) KY. PSC Final Administrative Charge – Interruptible (FCC) KY. PSC Final Energy Charge – Interruptible (FEC)	\$430.00. \$0.0833. \$430.00. \$0.0764.
Company Proposed Administrative Charge – Transportation (PCC) Company Proposed Energy Charge – Transportation (PEC) KY. PSC Final Administrative Charge – Transportation (FCC) KY. PSC Final Energy Charge – Transportation (FEC)	\$430.00. \$0.1862. \$430.00. \$0.1773.

Number of days to calculate interest (Interest Days):

Based on the payment due date of each meter read cycle for each month and the last date that customers were charged the Company Proposed amounts in 2005 (December 30).

Original Data:

Billing data files for the months of October, November and December 2005.

Methodology

The Company programmatically calculated the refund amount starting with the original data from the billing files. The original data files used the Company Proposed Charges to calculate each bill.

The October bills were prorated. Each bill showed an amount based on pre-October 3rd usage and usage on and after October 3rd. Only the portion showing the October 3rd and after amounts were used in this refund calculation.

Each bill was then recalculated using the Ky. PSC ordered charges. The difference between the proposed amount due and the final amount due was then determined. Interest was calculated on this difference from the original payment due date through December 30th. The calculated difference plus the interest is the monthly refund for each customer. The monthly refunds were added to come up with total refund for each customer.

In programmatic form, here is how the calculations were done:

Proposed Customer Amount = Customer Charge (in billing files)
Proposed Energy Amount = ccf (usage) * PEC (should equal the billing files)
Proposed Base Amount = Proposed Customer Amount + Proposed Energy Amount

Final Customer Amount = (Proposed Customer Amount / PCC) * FCC [This allows for any prorated bills, for example – a customer starts 15 days into a 30-day cycle. The Proposed Customer Amount = \$7.50 (1/2 of \$15.00). Therefore, the Final Customer Amount is (7.50 / 15.00) * 12.00 = 6.00.]

Final Energy Amount = ccf * FEC Final Base Amount = Final Customer Charge + Final Energy Charge

Base Refund = Proposed Base Amount – Final Base Amount Interest = ((Base Refund * (1 + (Interest Rate / 365)) Interest Days) – Base Refund) Monthly Refund = Base Refund + Interest

Total Refund = Sum of each customer's monthly refunds

EXAMPLES

R	AT	-E	D	c
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Account	33000220
Tenant No.	21
Cycle	18

	Interest		Original Customer	Original Energy	Customer	Proposed Energy	•	Final Customer	Final Energy	Final	Base		Monthly
<u>Month</u>	<u>Days</u>	<u>ccf</u>	<u>Charge</u>	Revenue	<u>Charge</u>	<u>Revenue</u>	<u>Base</u>	<u>Charge</u>	Revenue	<u>Base</u>	<u>Refund</u>	<u>Interest</u>	Refund
OCT	44	92	\$10.32	\$27.47	\$10.32	\$27.47	\$37.79	\$8.26	\$24.69	\$32.95	\$4.84	\$0.03	\$4.87
NOV	11	96	15.00	28.66	15.00	28.66	43.66	12.00	25.77	37.77	5.89	0.01	5.90
DEC	0	191	15.00	57.02	15.00	57.02	72.02	12.00	51.26	63.26	8.76	0.00	8.76
TOTAL REF	UND												\$19.53

OCTOBER Calculations

Interest Days = Calculation End Date(Dec. 30) - Scheduled Due Date (Nov. 16) = 44 Final Customer Charge = (\$10.32 / \$15.00) * \$12.00 = \$8.26

Formula Calculations 44

\$8.26 \$0.03

Interest = $(\$4.84 * (1 + (.0428 / 365)) ^ 44) - \$4.84 = \$0.03$

Original and Proposed Data should equal. Cinergy billed the customers at the Proposed Charges.

RATE GS

1500759 Account Tenant No. Cycle 17

			Original	Original	Proposed	Proposed		Final	Final				
	Interest		Customer	Energy	Customer	Energy	Proposed	Customer	Energy	Final	Base		Monthly
<u>Month</u>	<u>Days</u>	<u>ccf</u>	<u>Charge</u>	Revenue	<u>Charge</u>	Revenue	<u>Base</u>	<u>Charge</u>	Revenue	<u>Base</u>	Refund	<u>Interest</u>	Refund
OCT	45	627	\$23.91	\$128.79	\$23.91	\$128.79	\$152.70	\$18.63	\$131.73	\$150.36	\$2.34	\$0.01	\$2.35
NOV	16	5,900	38.50	1,211.86	38.50	1,211.86	1,250.36	30.00	1,239.59	1,269.59	(19.23)	(0.04)	(19.27)
DEC	0	13,320	38.50	2,735.93	38.50	2,735.93	2,774.43	30.00	2,798.53	2,828.53	(54.10)	0.00	(54.10)
TOTAL REFUND (\$71.02)													
AMOUNT OWED TO CINERGY IN THIS REFUND \$0.00										\$0.00			

OCTOBER Calculations

Interest Days = Calculation End Date(Dec. 30) - Scheduled Due Date (Nov. 15) = 45

Formula Calculations

45 \$18.63

Final Customer Charge = (\$23.91 / \$38.50) * \$30.00 = \$18.63 Interest = (\$2.34 * (1 + (.0428 / 365)) ^ 45) - \$2.34 = \$0.01

\$0.01

Original and Proposed Data should equal. Cinergy billed the customers at the Proposed Charges.

RATE GS

99300315 Account Tenant No. 20 09 Cycle

	Interest		Original Customer	Original Energy	Proposed Customer	Proposed Energy	Proposed	Final Customer	Final Energy	Final	Base		Monthly
<u>Month</u>	Days	<u>ccf</u>	Charge	Revenue	<u>Charge</u>	Revenue	<u>Base</u>	Charge	Revenue	<u>Base</u>	Refund	<u>Interest</u>	Refund
OCT	57	3	\$10.63	\$0.62	\$10.63	\$0.62	\$11.25	\$8.28	\$0.63	\$8.91	\$2.34	\$0.02	\$2.36
NOV	28	353	38.50	72.51	38.50	72.51	111.01	30.00	74.17	104.17	6.84	0.02	6.86
DEC	0	2,813	38.50	577.79	38.50	577.79	616.29	30.00	591.01	621.01	(4.72)	0.00	(4.72)
TOTAL REFU	JND												\$4.50

OCTOBER Calculations

Interest Days = Calculation End Date(Dec. 30) - Scheduled Due Date (Nov. 3) = 57 Final Customer Charge = (\$10.63 / \$38.50) * \$30.00 = \$8.28

Formula Calculations

57 \$8.28

Interest = (\$2.34 * (1 + (.0428 / 365)) ^ 57) - \$2.34 = \$0.02

\$0.02

Original and Proposed Data should equal. Cinergy billed the customers at the Proposed Charges.

THE UNION LIGHT, HEAT & POWER COMPANY Refund Totals Analysis for Case No. 2005-00042

				Refunds		Base		Net
RATE	<u>Bills</u>	<u>CCF</u>	<u>October</u>	November	<u>December</u>	Refund	<u>Interest</u>	<u>Refund</u>
RS	250,989	16,303,659	\$115,367	\$384,664	\$608,219	\$1,108,250	\$1,643	\$1,109,893
GS	19,719	9,394,389	21,092	45,242	30,568	96,902	238	97,140
IT	40	2,517,369	8,062	9,307	0	17,369	22	17,391
FT	116	2,287,288	8,840	11,517	0	20,357	23	20,380
TOTAL	270,864	30,502,705	\$153,361	\$450,730	\$638,787	\$1,242,878	\$1,927	\$1,244,805

		E	Bills		CCF				
RATE	October	November	<u>December</u>	<u>TOTAL</u>	October	<u>November</u>	<u>December</u>	TOTAL	
RS	75,997	87,376	87,616	250,989	634,174	4,188,989	11,480,496	16,303,659	
GS	5,948	6,845	6,926	19,719	525,133	2,749,853	6,119,403	9,394,389	
IT	20	20	0	40	1,168,474	1,348,895	0	2,517,369	
FT	58	58	0	116	993,255	1,294,033	0	2,287,288	

	Customer Energy		Full-Mo	onth Bill Perce	ntage
RATE	<u>Charge</u>	Charge	 <u>October</u>	November	December
DC Bronocod	\$15.00	\$0.298534	42.212%	98.585%	99.779%
RS - Proposed - Final	\$12.00	\$0.268400	42.211%	98.584%	99.778%
GS - Proposed	\$38.50	\$0.205400	46.601%	99.970%	1.008%
- Final	\$30.00	\$0.210100	46.601%	99.970%	1.008%
IT - Proposed	\$430.00	\$0.083300			
- Final	\$430.00	\$0.076400			
FT - Proposed	\$430.00	\$0.186200			
- Final	\$430.00	\$0.177300			

Refund Calculation Examples

Rate RS October =ROUND((634174*0.298534)-(634174*0.2684),0)+ROUND((0.4221247066771*75997*15)-(0.4221067717585*75997*12),0)

November =ROUND((4188989*0.298534)-(4188989*0.2684),0)+ROUND((0.9858497909418*87376*15)-(0.9858365569493*87376*12),0)

December =ROUND((11480496*0.298534)-(11480496*0.2684),0)+ROUND((0.9977850468712*87616*15)-(0.9977847748509*87616*12),0)

For more detailed billing information on your monthly bill, check box on right

------AUTO** 5-DIGIT 41017

Nov 16, 2005

\$ 455.80

\$ ______
WinterCare Contribution (for Customer Assistance)

Amount Enclosed

-ort Mitchell KY 41017-2709

PO Box 740320 Cincinnati OH 45274-0320

200 00000455806 33000220219 111620059 00000478172

Page 1 of 3

\$ 233.00

233.00cr

0.00

Name Karvice Addres	s Farijiqui	jes Cali A. cou	il Numies
	Cinergy/ULH&P	513-421-9500	
For Milchell KY 41017			

Mail/Paymenterformation Account marmation

PO Box 740320 Payments after Oct 25 not included Cincinnati OH 45274-0320 Last payment received Oct 04

Bill prepared on Oct 25, 2005 Next meter reading Nov 22, 2005

PLEASE NOTE: This is your Budget Billing adjustment bill. Beginning next month, your new Budget Billing amount will be \$329.00.

Meter	Number	Floating From	Date To	Daya	Meter Rau Previous	ling Present	Usage
Gas Elec	000795314 048793767	Sep 23 Oc Sep 23 Oc	1 25	32	5428 76310	5562 77375	134 1,065

Gaga - Free phopologic	
Usage - 42 CCF Cinergy/ULH&P - Rate RS	\$ 62.49
Usage - 92 CCF Cinergy/ULH&P - Rate RS Current Gas Charges	147.52 \$ 210.01
Gas Cost Recovery \$1.15970000/CC	
Old Rate Effective Sep 23 To Oct 03 New Rate Effective Oct 03 To Oct 25	

Budget Billing Amt Due	455.80
Current Amount Due	\$ 455.80
Account Balance	
Current Billing	\$ 455.80

Cotrert Billing

Amt Due - Previous Bill

Payment(s) Received

Balance Forward

	·
Current Electric Charges	\$71.78
Usage 1,065 kWh Cinergy/ULH&P - Rate RS	\$71.78
Electric - Residential	

IX			233			***
Tax	es			 	\$ 8.4	5

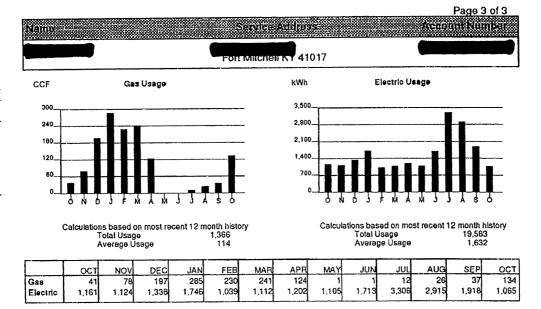
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Due Dale	Amount Line
Nov 16, 2005	\$ 455.80
	1 1

Check out CinergyComfort.com where you can enroll in Budget Billing and find ways to save energy and money

		Explanation of Cultain Ghargas		
Gas Meter •	000795314	Cinergy/ULH&P Rate RS - Residential Service		
CCF Usage - Sep 23 - Oct 25	134	Old Rate Effective Sep 23 To Oct 03 Customer Charge	\$ 2.59	
32 Days		Gas Delivery Charge 42 CCF @ \$ 0.23340000	9.80	
		Gas DSM Rider 42 CCF @ \$ 0.03299140	1.39	
		Gas Cost Recovery 42 CCF @ \$1.15970000	48.71	\$ 62.49
		Cinergy/ULH&P Rate RS - Residential Service		
		New Rate Effective Oct 03 To Oct 25 Customer Charge Gas Delivery Charge	\$ 10.32	
		92 CCF @ \$ 0.29853400 Gas DSM Rider	27.47	
		92 CCF @ \$ 0.03299140 Gas Cost Recovery	3.04	
		92 CCF @ \$ 1.15970000	106.69	147.52
	-	Total Onitent Cas	Charges	\$ 210.01
Electric Meter -	048793767	Cinergy/ULH&P Rate RS - Residential Svc-Winter		
kWh Usage -	1,065	Customer Charge	\$ 3.73	
Sep 23 - Oct 25 32 Days		Energy Chrg 1,000 kWh @ \$ 0.06562000 65 kWh @ \$ 0.05059000	65.62 3.29	
		Elec DSM Rider 1,065 kWh @ \$ 0.00172300	1.83	
		Elec Fuel Adjustment 1,065 kWh @ \$ 0.00252500cr	2.69cr	71.78
		Total Current Electric	Charges	\$ 71.78

	Explanation of Taxes		
Taxes	Rate Incr for School Tax	\$ 8.45	\$ 8.45
		pla laxes	\$ 8.45

	tudget Billi	ng-PlantGCP) (niommion	
Summary BBP Option : BBP Installment Amount:	Annual Plan \$ 455.80	Previous Budget Billing Balance Current Gas Charges Current Electric Charges Taxes Budget Billing Amt Due Budget Billing Balance	\$ 165,56 210.01 71.78 8.45 455,80cr \$ 0.00





200 00000329002 33000220219 121920050 00000345113

Name/Bervice Address Fort Mitchell KY 41017	Cinergy/ULH	Formanias 6: &P	ill 513- 421 -950	Account	nge 1 of 3
Mail Paymel (14-7) PO Box 740320 Cincinnati OH 45274-0320		Account Nov 23 not included accived Nov 02		red on Nov 23, er reading Dec 2	
	To D (ov 22	vs Fravio 28 55	562	5658 8210	96 835
Gos Residential Usage - 96 CCF Cinergy/ULH&P - Rate RS Current Gas Charges Gas Cost Recovery \$1.30160000/	\$ 171.78 \$ 171.78 CCF	Amt Due - Previe Payment(s) Rec Balance Forwa Budget Billing A Current Amoun	ous Bill eived rd mt Due		\$ 455.80 455.80cr 0.00 329.00 \$ 329.00
Electrics Electronial Usage - 835 kWh Cinergy/ULH&P - Rate RS Current Electric Charges	\$ 57.85 \$ 57.8 5	Account Talan Current Billing Budget Billing B Total Account I	alance		\$ 329.00 92.48cr \$ 236.52
Taxes	\$ 6.89				<u></u>

Urgent Message - We appreciate your help in providing us with your meter read; however, we are required to have an employee read your meter(s) at least once a year. Please call us today to make arrangements for us to read your meter.



Budget Billing allows you to level out your energy bill. Go to www.CinergyComfort.com to enroll, or call 1-888-BEWARM2 (1-888-239-2762).

		Explanation of Current Gnarges	
Gas Meter -	000795314	Cinergy/ULH&P Rate RS - Residential Service	
CCF Usage -	96	Customer Charge \$ 15.00	
Oct 25 - Nov 22 28 Days		Gas Delivery Charge 96 CCF @ \$ 0.29853400 28.66 Gas DSM Rider	
,		96 CCF @ \$0.03299140 3.17	
		Gas Cost Recovery 96 CCF @ \$1.30160000 124.95	\$ 171.78
		Total Current Spar Changes	\$ 171.78
Electric Meter -	048793767	Cinergy/ULH&P Rate RS - Residential Svc-Winter	
kWh Usage -	835	Customer Charge \$ 3.73	
Oct 25 - Nov 22 28 Days		Energy Chrg 835 kWh @ \$ 0.06562000 54.79 Elec DSM Rider	
		835 kWh @ \$ 0.00172300 1.44	
		Elec Fuel Adjustment 835 kWh @ \$ 0.00252500cr 2.11c	r 57.85
		Total Con ant Electric Charges	\$ 57.85

	Explanation of Faxes		
Taxes	Rate Incr for School Tax	\$ 6.89	\$ 6.89
		isiai Taxes	\$ 6.89

	Eudgel Bill	ing Plam(BER) jatormatien	
Summary BBP Option : BBP Installment Amount:	Annual Plan \$ 329.00	Previous Budget Billing Balance Current Gas Charges Current Electric Charges Taxes Budget Billing Amt Due Budget Billing Balance	\$ 0.00 171.78 57.85 6.89 329.00cr \$ 92.48cr

Page 3 of 3 Academic Number Name Service/Address Fort Milchell RY 41017 Gas Usage kWh Electric Usage CCF 3,500. 300. 2,800 180. 2,100 1,400_ 120. 700 Calculations based on most recent 12 month history Total Usage 19,294 Average Usage 1,608 Calculations based on most recent 12 month history Total Usage 1,384 Average Usage 115

	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ОСТ	NOV
Gas	78	197	285	230	241	124	1	1	12	26	37	134	96
Electric	1,124	1,338	1.746	1,039	1,112	1,202	1,105	1.713	3,306	2,915	1,918	1,085	835
							<u> </u>				<u> </u>		

Account Number 80 18	Jan 23, 2006 \$ 329.00
For more detailed billing information on your monthly bill, check box on right	\$\$ WinterCare Contribution Amount Enclosed (for Customer Assistance)
hladadillaandikadabladikadaladadid	
Fort Mitchell KY 41017-2709	PO Box 740320 Cincinnati OH 45274-0320

200 000000 00005E510 P15055000EE 500P5E00000 005

							Page 1 of 3
Name/Se	vice Adile	58		. For hig	ulties Call	Acc	ount Number
		***********************	Cinergy/U	LH&P	513-	421-9500	
Fort Milche	SILKY 41017	,					
O BATTOR AVAILA	one To				Account infor	mation.	
100000000000000000000000000000000000000				93,500,007,507,000,000	************		
PO Box 74 Cincinnati	10320 OH 4527	4-0320		ifter Dec 30 no nt received De		Bill prepared on De lext meter reading	
Ontoninan	011 4021	4-0020	cast paymo			tom motor roughly	04.11 20, 2000
		Beadle	o Date		Meter R	eading	
Motor	Number	From	10	Cleye	Previous	Presunt	Usaga
	0795314	Nov 22		37	5658	5849	191
Elec 04	8793767	Nov 22	Dec 29	37	78210	80951	2,741
				KZD-15-10-		**************	***************************************
Gas Hes	dential			Curren	t silling		
Usage -	191 CC		* 040 0	1 1	e - Previous B	***	\$ 329.00
, .,	LH&P - Rate las Charge:		\$ 312.24 \$ 312.24		nt(s) Received e Fo rward		329,00cr 0.00
I I	Recovery \$		• • •		Billing Amt Du	1e	329.00
Gas Cosi	Hecovery &	1.2241000		Curren	t Amount Due	•	\$ 329.00

Usage - 191 CCF Cinergy/ULH&P - Rate RS	\$ 312.24	Amt Due - Previous Bill Payment(s) Received
Current Gas Charges	\$ 312.24	Balance Forward Budget Billing Amt Due
Gas Cost Recovery \$1.2247000	Current Amount Due	
Elemin Residential		

Usage - 2,741 kWh Cineray/ULH&P - Bate RS \$ 155.23	Account Ballance Current Billing Budget Billing Balance Total Account Balance	\$ 329.00 60.02 \$ 389.02

\$14.03

Taxes

Urgent Message - Your bill has been estimated for at least 9 months because we have not had access to your meter(s). Please call us to make permanent meter reading arrangements before your next scheduled meter reading date.

Jan 23, 2006	\$ 329.00
Due D ate	Amountique

Name Service Address Account Number

Fort Mitchell KY 41017

You can't predict the weather, but you can your monthly bill. If you haven't already, enroll in Budget Billing today. Sign up at www.CinergyComfort.com, and also learn about ways to reduce your energy use. Or call 1-888-BEWARM2 (1-888-239-2762).

		Explanation of Gurrent Onorges	
Gas Meter -	000795314	Cinergy/ULH&P Rate RS - Residential Service	
CCF Usage -	191	Customer Charge \$ 15.00	
Nov 22 - Dec 29 37 Days		Gas Delivery Charge 191 CCF @ \$0.29853400 57.02 Gas DSM Rider	
,		191 CCF @ \$ 0.03299140 6.30	
		Gas Cost Recovery 191 CCF @ \$1.22470000 233.92	\$ 312.24
		Total Gurrent Gas Charges	\$ 312.24
Electric Meter	048793767	Cinergy/ULH&P Rate RS - Residential Svc-Winter	
kWh Usage	2,741	Customer Charge \$ 3.73	
Nov 22 - Dec 29 37 Days		Energy Chrg 1,000 kWh @ \$ 0.06562000 65.62 1,741 kWh @ \$ 0.05059000 88.08 Elec DSM Rider	
		2,741 kWh @ \$ 0.00172300 4.72 Elec Fuel Adjustment	
		2,741 kWh @ \$ 0.00252500cr 6.92cr	155.23
		Total Current Electric Charges	\$ 155.23

	Explanation of Fex co		
Taxes	Rate Incr for School Tax	\$ 14.03	\$ 14.03
		Total lexea	\$ 14.03

	Eusiget Bill	ng Plan (BEP) intormation	
Summary BBP Option : BBP Installment Amount:	Annual Plan \$ 329.00	Previous Budget Billing Balance Current Gas Charges Current Electric Charges Taxes Budget Billing Amt Due Budget Billing Balance	\$ 92.48cr 312.24 155.23 14.03 329.00cr \$ 60.02

