KPSC Case No. 2014-00396 Commission Staff's First Set of Data Requests Dated November 24, 2014 Item No. 52 Attachment 1 Page 1 of 8







February 4, 1993

Subject 1993 Postretirement Benefits Expense

G. S. Campbell/H. E. McCoy

Ft. Wayne Ashland Ε. Bafile

E. L. Berginnis Columbus (CSP) T. P. Bowman

J. R. Hoffer Canton

C. D. Jones Lancaster

Columbus R. Knorr

G. E. Laurey - Roanoke



Beginning in 1993, the AEP System Companies must record postretirement benefits expense on the accrual basis in accordance with FASB Statement (SFAS) No. 106. This letter provides accounting instructions to record postretirement benefits expense based on a valuation performed by our actuary. A separate letter in the future will authorize postretirement benefits Voluntary Employees' Beneficiary Association (VEBA) trust fund contributions, which will be tied to recovery of the accrued expenses through rates.

Postretirement benefits expense accrual adjustment totals to record the incremental SFAS No. 106 cost for 1993 are shown on the attached schedule. One-twelfth (1/12) of the total 1993 SFAS No. 106 accrual adjustment as shown on the attached schedule should be recorded each month, as follows:



	Account No.	Description	<u>Debit</u>	Credit
JE 130	626.71	Employee Pensions and Benefits - Other Postretirement Benefits	/43,783 \$ XXX	}
	242 90	Miscellaneous Current and Accrued Liabilities - OTHEN POSTNETHEMENT DE	MEFITS	143,78. \$ XXX
		To accrue the incremental cost of postretirement benefits in accordance with SFAS No. 106.		

Cr. M +00 143, 783

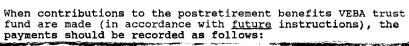




AEP Service Corporation and the coal companies should record other postretirement benefits to their corresponding employee pensions and benefits accounts.

Since accrued postretirement benefits expenses are not currently deductible for federal income tax purposes, a Schedule M addition adjustment should be provided monthly to remove the accrued expense from taxable income. Deferred federal income taxes should be recorded through the Mechanized Tax System, which will result in the following journal entry:

	Journal Entry No. 1 - Tax			
	Account No.	Description Debit	- <u>Credit</u>	
wi.	190.1	Accumulated Deferred Income Taxes \$ XXX		
	411.1	Provision for Deferred Income Taxes - Credit, Utility Operating Income	\$ XXX	
		To defer the FIT related to the accrual of incremental SFAS No. 106 costs.		



	Journal Entry No. 2		
Account No.	Description	<u>Debit</u>	Credit
242	Miscellaneous Current and Accrued Liabilities	\$ XXX	
232	Accounts Payable		\$ XXX
	To record contributions to the postretirement benefits VEBA trust fund.		

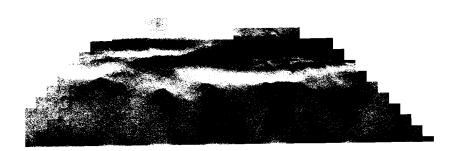
KPSC Case No. 2014-00396 Commission Staff's First Set of Data Requests Dated November 24, 2014 Item No. 52 Attachment 1 Page 3 of 8

February 4, 1993 Page 3

Contributions to the postretirement benefits VEBA trust fund are not necessarily fully deductible for income tax purposes when the contributions are made, although all SFAS No. 106 expense will become deductible when benefits are paid in the future. The currently deductible portion of VEBA contributions under the Internal Revenue Code is limited because it is calculated with no provision for future medical cost inflation. The currently deductible portion of VEBA contributions as determined by our actuary should be included in taxable income by providing a Schedule M deduction adjustment. Related deferred federal income taxes should be reversed through the Mechanized Tax System, which will result in the following journal entry:

	Journal Entry No. 2 - Tax			
Account No.	Description	<u>Debit</u>	Credit	***
410.1	Provision for Deferred Income Taxes, Utility Operating Income	\$ XXX		
190.1	Accumulated Deferred Income Taxes		\$ XXX	
	To reverse the SFAS No. 106 accrual deferred FIT to the extent that the accrual is currently deductible upon its contribution to the VEBA trust.			

Total SFAS No. 106 cost is comprised of the accrual adjustment in Journal Entry No. 1 above plus retiree pay-as-you-go costs which are recorded along with the cost of life insurance and medical benefits for current employees in Accounts 626.43 and 626.44 as those benefits are paid. Accordingly, the cost of pay-as-you-go life insurance and medical benefits for retirees should be reclassified to SFAS No. 106 costs monthly in the amount of one-twelfth (1/12) of the annual numbers as shown on the attached schedule, as follows:



February 4, 1993 Page 4

	Account No.	Description	Debit	Credit
JE 130	626.71	Employee Pensions and Benefits - Other Postretirement Benefits	56,485 \$ xxx	
	626.43	Employee Pensions and Benefits - Group Life Insurance		17,354 \$ XXX
% 44.	626.44	Employee Pensions and Benefits - Group Medical Insurance		44,131 XXX
		To reclassify the retiree portion of pay-as-you-go group life insurance and medical benefits to SFAS No. 106 costs.		

Until rate levels are adjusted to include SFAS No. 106 costs, some of the operating companies will defer for future recovery in certain jurisdictions the SFAS No. 106 increase in cost recorded in Journal Entry No. 1 above (but not Journal Entry No. 3). However, amounts which are currently billable through unit power agreements or other special contracts should be billed rather than deferred. Monthly deferrals of the SFAS No. 106 accrual adjustment recorded in Journal Entry No. 1 should be recorded for the jurisdictions indicated on the attached schedule, as follows:

Journal Entry No. 4

Account No.	Description	<u>Debit</u>	Credit
186	Miscellaneous Deferred Debits - Other Postretirement Benefits	\$ XXX	
626.71	Employee Pensions and Benefits - Other Postretirement Benefits		\$ XXX
	To defer the jurisdictional portion of the incremental cost of SFAS No. 106 postretirement benefits for future recovery.		

KPSC Case No. 2014-00396 Commission Staff's First Set of Data Requests Dated November 24, 2014 Item No. 52 Attachment 1 Page 5 of 8

February 4, 1993 Page 5

A Schedule M deduction adjustment should be provided monthly to remove the above deferral from taxable income. Related deferred federal income taxes should be recorded through the Mechanized Tax System, which will result in the following journal entry:

	Journal Entry No. 4 - Tax	κ		
Account No.	Description	<u>Debit</u>	Credit	
410.1	Provision for Deferred Income Taxes, Utility Operating Income	\$ XXX		
283.1	Accumulated Deferred Income Taxes - Other		\$ XXX	
	To record deferred FIT on SFAS No. 106 costs which have been deferred for future recovery.			

Once rate recovery begins, the incremental postretirement benefits cost deferred as a regulatory asset in Journal Entry No. 4 should be amortized commensurate with ratemaking treatment, as follows:

	Journal Entry No. 5	 		
Account No.	Description	Debit	Credit	Sistem
626.71	Employee Pensions and Benefits - Other Postretirement Benefits	\$ xxx		
186	Miscellaneous Deferred Debits - Other Postretirement Benefits		\$ XXX	
	To amortize the deferred incremental cost of SFAS No. 106 postretirement benefits commensurate with rate recovery	ery.		

In order to remove the amortization from current taxable income, a Schedule M addition adjustment should be provided. Related deferred income taxes should be reversed through the Mechanized Tax System, which will result in the following journal entry:

KPSC Case No. 2014-00396 Commission Staff's First Set of Data Requests Dated November 24, 2014 Item No. 52 Attachment 1 Page 6 of 8

February 4, 1993 Page 6

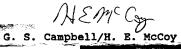
Journal Entry No. 5 - Tax

Account Description Debit Credit No. 283.1 Accumulated Deferred Income Taxes - Other \$ XXX Provision for Deferred Income 411.1 Taxes - Credit, Utility Operating Income \$ XXX To amortize deferred FIT related to the amortization of deferred SFAS No. 106 costs.

JE130 704-5000 204-8000

The SFAS No. 106 cost recorded in Account 626.71 should be payroll loaded so that a portion of the cost will be capitalized as a component of construction cost. Payroll the programming to handle this automatically is complete.

Please contact us if you should have any questions.



GSC:HEM:ca Attachment

cc: L. V. Assante

G. C. Dean

P. J. DeMaria

B. G. Lynn W. L. Scott

J. H. Shepard, Jr.

Deloitte & Touche

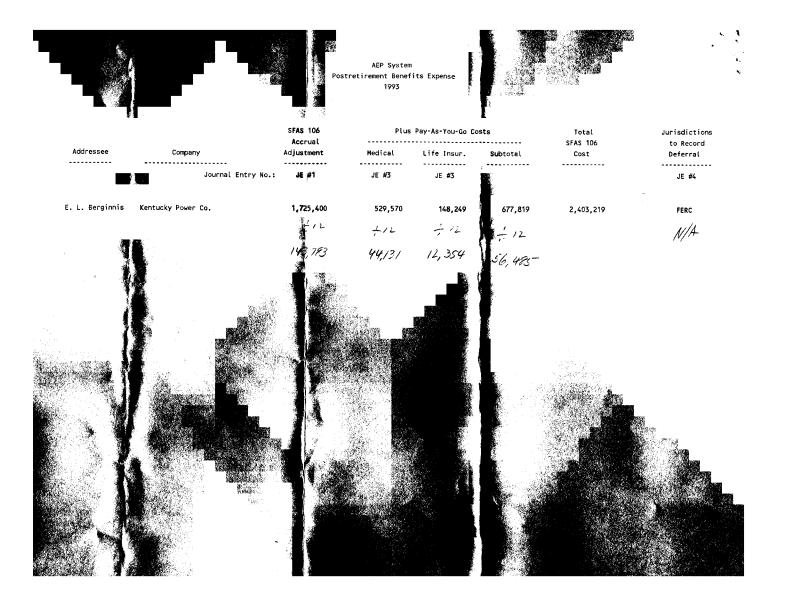
rc: H. W. Fayne

G. P. Maloney

R. A. Mueller A. P. Varley

c:\hem\hem005.93





Attachments Here) KENTUCKY POWER COMPANY Page No. of RNAL ENTRY VOUCHER 013-J130 JANUARY, 1993 J.E.No. Month and Year SHORT ACCOUNT TITLE ACCOUNT CONTRA-ACCT DEBIT DESCRIPTION CREDIT OPER MAINT EXP-UNSEG 40190 POSTRETIRE BENEFIT EXP 24290 143,783.00 MC&AL-OH P/RET BENEFIT 24290 POSTRETIRE BENE ACCRUAL 40190 143,783.00 MC&AL-ALL OTHER 24299 DEFER W/O CHARGES 40190 27,318.00 OPER MAINT EXP-UNSEG 40190 24299 POST RETIRE W/O LOAD 27,318.00 OPER MAINT EXP-UNSEG 40190 RECLASS TO SFAS 106 40190 56,485.00 OPER MAINT EXP-UNSEG 40190 RECLASS FORM P.A.Y.G. 40190 56,485.00

EXPLANATION: 1) To accure the incremental cost of postretirement benefits in accordance with SFAS No. 106 per letter of G. S. Campbell/H. E. McCoy letter of 2/4/93. 2)To load W/O with portion of other postretirement

227,586.00

227,586.00

\$. }

KRS/df

02/09/93

benefits that should be payroll loaded. 3) To reclassify the retiree portion of pay-as-go Group Life Insurance Acct. Dept. Approvals:

Compiled By

Approv Form TRY-25 KY Rev. 1/91

KPSC Case No. 2014-00396 Commission Staff's First Set of Data Requests Dated November 24, 2014 Item No. 52 Attachment 1 Page 8 of 8