COUNTY OF HAMILTON		SS:		
The undersigned, Bruce I	L. Sailers	, Pricing and R	legulatory Solu	itions Manager,
being duly sworn, deposes and s	says that l	ne has personal	knowledge of	the matters set
forth in the foregoing data reques	sts, and th	nat the answers	contained there	ein are true and

correct to the best of his knowledge, information and belief.

Bruce L. Sailes

Subscribed and sworn to before me by Bruce L. Sailers, on this

NOVEMBER, 2017.

STATE OF OHIO

ADELE M. FRISCH Notary Public, State of Ohio My Commission Expires 01-05-2019

My Commission Expires: 1/5/2019

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, William Don Wathen Jr., Director of Rates & Regulatory Strategy, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

Subscribed and sworn to before me by William Don Wathen Jr., on this day of

ADELE M. FRISCH Notary Public, State of Ohio My Commission Expires 01-05-2019

Adult M. Frisch

NOTARY PUBLIC

My Commission Expires: 1/5/2019

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, James E. Ziolkowski, Director, Rates & Regulatory Planning, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of his knowledge, information and belief.

James E. Ziolkowski Affiant

Subscribed and sworn to before me by James E. Ziolkowski on this day of NOVEMBER, 2017.

ADELE M. FRISCH Notary Public, State of Ohio My Commission Expires 01-05-2019

Adulu M. Frisch

NOTARY PUBLIC

My Commission Expires: 1 | 5 | 2019

STATE OF OHIO	)	
	)	SS:
COUNTY OF HAMILTON	)	

The undersigned, Sarah E. Lawler, Utility Strategy Director, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

Sarah E. Lawler Affiant

Subscribed and sworn to before me by Sarah E. Lawler on this 6th day of November, 2017.

My Commission Expires:

Mita M. Schafer NOTARY PUBLIC

> ANITA M. SCHAFER Notary Public, State of Ohio My Commission Expires November 4, 2019

# KyPSC Case No. 2017-00321 NORTHERN KENTUCKY UNIVERSITY'S FIRST SET TABLE OF CONTENTS

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Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017

NKU-DR-01-001

## **REQUEST:**

Please provide all Section M schedules in Excel format with all formulas intact.

### **RESPONSE:**

See NKU-DR-01-001 Attachment 1 (Base Period) and Attachment 2 (Test Period) provided on CD.

**PERSON RESPONSIBLE:** Bruce L. Sailers

# NKU-DR-01-001 ATTACHMENT 1 IS BEING PROVIDED ON CD

# NKU-DR-01-001 ATTACHMENT 2 IS BEING PROVIDED ON CD

Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017

NKU-DR-01-002

## **REQUEST:**

Please provide all Section N schedules in Excel format with all formulas intact.

### **RESPONSE:**

See attachments in response to NKU-DR-01-001.

PERSON RESPONSIBLE: Bruce L. Sailers

Northern Kentucky University's First Set Data Requests

Date Received: October 27, 2017

NKU-DR-01-003

**REQUEST:** 

To the extent not already provided, please provide in Excel format with all formulas

intact all workpapers supporting the direct testimony and attachments of Mr. Sailers.

**RESPONSE:** 

See NKU-DR-01-003 Attachment 1 (Income Based Average Usage Calculation). Also

see attachments in response to the following data requests.

- Staff-DR-01-071

- Staff-DR-02-064

- NKU-DR-01-001

- KSBA-DR-01-017

PERSON RESPONSIBLE:

Bruce L. Sailers

LI_ID	KWHID	Total_KWH	Avg_KWH	NumAccts
0	1	5,952,648	1,422	4187
0	2	20,255,613	4,095	4946
0	3	85,657,532	6,617	12945
0	4	212,166,246	9,988	21242
0	- 5	228,857,558	13,867	16504
0	6	180,793,612	17,800	10157
0	7	255,472,266	26,016	9820
1	1	2,183,112	1,604	1361
1	2	9,313,853	4,096	2274
1	3	33,594,229	6,555	5125
1	4	66,192,886	9,934	6663
1	5	61,407,772	13,790	4453
1	6	43,499,158	17,784	2446
1	7	54,748,635	25,137	2178

Overall Average kWh	/ Customer	Accts
Low Income	11,059	24,500
Not Low Income	12,395	79,801

These results use an inflection point of 200% of Poverty Level; Only use accounts with 12 months of data in CY2016; and remove all accounts with < 0 kWh. These results are also based on specific account & tenant combinations to identify unique customers.

Duke Energy Kentucky
Case No. 2017-00321
Northern Kentucky University's First Set Data Requests
Date Received: October 27, 2017

NKU-DR-01-004

## **REQUEST:**

To the extent not already provided, please provide in Excel format with all formulas intact all attachments to Mr. Sailers' direct testimony.

### **RESPONSE:**

See the attachments provided in response to Staff-DR-01-071.

PERSON RESPONSIBLE:

Bruce L. Sailers

Northern Kentucky University's First Set Data Requests

Date Received: October 27, 2017

NKU-DR-01-005

**REQUEST:** 

With respect to the Company's response to Staff DR-01-027, please break down the base

period average monthly customer bills (186) for Rate Schedule DT by customer charge

type (Single Phase, Three Phase and Primary Voltage).

RESPONSE:

From Schedule M-2.2 Pages 4 and 5 of 22, the total annual billing month determinants

are:

- Single Phase = 0

- Three Phase = 1,786

- Primary = 443

Converting this information into an average monthly bills value is done by dividing the

value by 12 resulting in the following.

- Single Phase = 0 / 12 = 0

- Three Phase = 1,786 / 12 = 149

- Primary = 443 / 12 = 37

PERSON RESPONSIBLE:

Bruce L. Sailers

Northern Kentucky University's First Set Data Requests

Date Received: October 27, 2017

NKU-DR-01-006

**REQUEST:** 

With respect to Mr. Sailers' direct testimony at page 10, line 17, he states that the

proposed customer charge for Rate DT primary service is \$465. Please reconcile this

charge with the value shown in cell I33, \$155.07, of the tab "CustomerCharge" contained

in the cost of service study Excel spreadsheet provided in response to Staff DR-01-029.

**RESPONSE:** 

The values do not reconcile. The proposed customer charges for Rate DT inadvertently

and incorrectly used only the number of summer bills in the calculation rather than the

total number of bills. Note that total revenues collected from the proposed charges

collect the Rate DT revenue requirement from the cost of service study. Therefore,

altering the proposed customer charges also impact the other charges of the proposed

rate. To display the correct Rate DT charges using the appropriate total number of bills,

examples of what Schedule M-2.2 and M-2.3 Pages 4 and 5 of 20 would look like for the

Test Period are provided in NKU-DR-01-006 Attachment 1, which is being provided on

CD.

PERSON RESPONSIBLE:

Bruce L. Sailers

# NKU-DR-01-006 ATTACHMENT 1 IS BEING PROVIDED ON CD

Northern Kentucky University's First Set Data Requests

Date Received: October 27, 2017

NKU-DR-01-007

**REQUEST:** 

With respect to the Company's new Rider ESM, please provide the following

information:

a. Describe how the costs recovered under the rider will be allocated to classes.

b. Describe how the costs will be recovered from classes. Include a description

of the proposed charges for each class (per kWh, per kW, percent of monthly

bill, etc.).

**RESPONSE:** 

a. As outlined in the direct testimony of Sarah E. Lawler, Attachment SEL-2,

the costs recovered under the rider will be allocated to residential and non-

residential customers based on average monthly revenue as a percentage

of total revenue, excluding ESM revenue.

b. The monthly environmental surcharge factor will be a percentage of the

customer's monthly bill. For residential customers, the surcharge will be

based on a percentage of revenues excluding ESM revenues. For non-

residential customers, the surcharge will be based on a percentage of non-

fuel revenues excluding ESM revenues. The initial charge will be

calculated on the first Rider ESM filing.

PERSON RESPONSIBLE:

Sarah E. Lawler

Northern Kentucky University's First Set Data Requests

Date Received: October 27, 2017

**NKU-DR-01-008** 

**REQUEST:** 

With respect to the Company's new Rider FTR, please provide the following

information:

a. Describe how the costs recovered under the rider will be allocated to classes.

b. Describe how the costs will be recovered from classes. Include a description of the

proposed charges for each class (per kWh, per kW, percent of monthly bill, etc.).

**RESPONSE:** 

a. Rider FTR is designed to "track" the difference between amounts in base rates and

actual costs. Therefore, the dollars to be recovered under Rider FTR are proposed to

be allocated based on each rate class' respective share of total kWh sales.

b. The proposed charges will be recovered from each class by a \$ / kWh charge as

shown in the Rider FTR template provided in Attachment WDW-1, Schedule 1.

PERSON RESPONSIBLE:

William Don Wathen Jr.

Northern Kentucky University's First Set Data Requests

Date Received: October 27, 2017

**NKU-DR-01-009** 

**REQUEST:** 

With respect to the Company's new Rider DCI, please provide the following information:

a. Describe how the costs recovered under the rider will be allocated to classes.

b. Describe how the costs will be recovered from classes. Include a description of the

proposed charges for each class (per kWh, per kW, percent of monthly bill, etc.).

**RESPONSE:** 

a. See Attachment SEL-3, page 2 of 7.

b. See response to NKU-DR-01-009(a).

**PERSON RESPONSIBLE:** 

Sarah E. Lawler

Northern Kentucky University's First Set Data Requests

Date Received: October 27, 2017

NKU-DR-01-010

## **REQUEST:**

To the extent not already provided, please provide in Excel format with all formulas intact all workpapers supporting the direct testimony and attachments of Mr. Ziolkowski.

### **RESPONSE:**

The information was provided in response to Staff-DR-01-29.

PERSON RESPONSIBLE:

James E. Ziolkowski

Northern Kentucky University's First Set Data Requests

Date Received: October 27, 2017

NKU-DR-01-011

**REQUEST:** 

To the extent not already provided, please provide in Excel format with all formulas

intact all attachments to Mr. Ziolkowski's direct testimony.

**RESPONSE:** 

Please see response to STAFF-DR-01-029 for a copy of Duke Energy Kentucky's Cost of

Service model.

Please see NKY-DR-01-011 Attachment for a copy of Attachments JEZ-1 and JEZ-2.

PERSON RESPONSIBLE:

James E. Ziolkowski

Attachment JEZ-1

DUKE ENERGY KENTUCKY, INC.
ELECTRIC COST OF SERVICE STUDY
CASE NO: 2017-00321
ALLOCATION FACTORS FOR COST OF SERVICE STUDY

NO.	RATE GROUP	12 CP DEMAND RATIO %	AVG & EXCESS RATIO %	DIFFERENCE %	S/NS RATIO %	DIFFERENCE %
1	AND AND SELECTION OF THE PERSON OF	Α	В	C=B-A	D	E=D-A
2	Retail:					
3	Residential	41.780%	41.043%	-0.737%	41.764%	-0.016%
4	Dist Secondary - DS	29.423%	28.228%	-1.195%	29.561%	0.138%
5	Dist Secondary - GS-FL	0.136%	0.133%	-0.003%	0.135%	-0.001%
6	Dist Secondary - EH	0.479%	0.620%	0.141%	0.443%	-0.036%
7	Dist Secondary - SP	0.007%	0.007%	0.000%	0.007%	0.000%
8	Dist Secondary - DT	13.928%	14.529%	0.601%	13.915%	-0.013%
9	Dist Primary - DT	9.544%	10.107%	0.563%	9.523%	-0.021%
10	Dist Primary - DP	0.348%	0.334%	-0.014%	0.345%	-0.003%
11	Transmission	4.208%	4.379%	0.171%	4.171%	-0.037%
12	Lighting	0.143%	0.616%	0.473%	0.132%	-0.011%
13	Other	0.004%	0.004%	0.000%	0.004%	0.000%
14	Total Retail	100.000%	100.000%	0.000%	100.000%	0.000%

DUKE ENERGY KENTUCKY, INC. ELECTRIC COST OF SERVICE STUDY CASE NO: 2017-90321

						Present	Inter Class	Inter Class		K201 A	Mocator Using 12	CP	
		Jurisdictional Electric	Present	Net Operating	Present	Revenues At Average	Subsidization Overcollected	Subsidization times	Rate Increase (Allocated to class	Proposed Revenues 90.00% Interclass	Proposed Percent	At Proposed	Proposed Increas Less
Line		Capitalization	Revenues	Income	ROR	ROR	(Undercollected)	10.00%	based on Rate Base)	Subsidization	Increase	Rates	(Subsidy) Excess
No.	Rate Class	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(1)	(J)	(K)	(L)
		FR-16(7)(v)-14, page1	FR-16(7)(v)-14, page1	Work Paper FR- 16(7)(v), Page 2		(B) + (((D) Line 5 ° (C))/(1- CompositeTsxRate))	(B) ~ (É)	(F) * 10.00%	(H) Line 5 * ((A) / (A) Line 5)	(B) - (G) + (H)	((H) - (G)) / (B)	((((H) - (G))*(1- CompositeTsoRate) + (C)) / (A)	(H) - (G)
1	Rate RS	\$ 317,425,709	\$ 120,391,018	\$ 3,124,836	0.9844%	\$ 129,927,706	\$ (9,536,688)	\$ (963,867)	\$ 21,901,356	\$ 143,245,041	18.984%	5.414347%	\$ 22,855,023
2	Rate DS	200.757.532	89,987,454	11,187,968	5,5729%	81.026,932	8.940,522	894,052	13,851,623	102,925,025	14,403%	8,543943%	12,957,571
3	Rate GS-FL	932,077	589,997	129,751	13,9206%	422,024	167,973	18,797	64,310	837,510	8.053%	17.056944%	47.513
4	Rate EH	3,472,840	623,628	(418,272)	-12.0441%	1,463,366	(839,738)	(83,974)	239,631	947,233	51.891%	-6.311026%	323.605
5	Rate SP	57,138	28,730	5.292	9.2818%	22,760	5.970	597	3,940	32,073	11.637%	12.881868%	3,343
-													
6	Rate DT - Secondary	91,880,872		3,817,007	4.1543%	43,930,272	1,973,352	197,335	6,339,478	52,045,787	13.381%	8.267225%	6,142,143
7	Rate DT-Primary	62,892,854	30,722,085	1,348,318	2.1438%	31,428,461	(704,376)	(70,438)	4,339,389	15,331,912	14.354%	6.457795%	4,409,827
8	Rate DP	2,273,698	926,746	(1,938)	-0.0852%	1,034,586	(107,840)	(10,784)	156,884	1,094,414	18.092%	4.451814%	167,668
9	Rate TT	21,736,943	13,220,511	825,853	3.7993%	12,879,079	341,432	34,143	1,499,763	14,586,131	11.086%	7,947690%	1,465,620
10	Lighting	3,107,084	1,889,364	36,900	1.1876%	1,972,452	(83,088)	(8,309)	214,384	2,112,057	11.787%	5,597312%	222,693
11	Other - Water Pumping	514,293	7,414	(82,345)	-16.0113%	164,933	(157,519)	(15,752)	35,483	58,629	690.789%	-9.684365%	51,215
13	Total	\$ 705.051.140	\$ 304,270,571	\$ 19,973,370	2.8329%	\$ 304,270,571	\$		\$ 48.646.222	\$ 352,918,793	15.988%	7.077963%	\$ 48.646.222
3 4	Rate DS Rate GS-FL Rate EH Rate SP	195,467,634 918,929 4,095,205	89,967,454 589,997 623,626	11,262,533 129,997 (426,967)	5.7618% 14.1466% -10.4260%	80,882,180 421,019	9,305,294	930,529 16,898	13,486,630 63,386	102,523,555	13.956% 7.879%	9,714018%	12,556,101
6 7 8 9 10	Rate DT - Secondary Rate DT-Primary Rate DP Rate TT Lighting	57,138 94,536,877 65,382,312 2,212,339 22,490,792 5,202,085 518,678	28,730 45,903,624 30,722,085 926,748 13,220,511 1,889,384	5,293 3,779,629 1,313,237 (1,141) 815,147 7,589	9.2635% 3.9960% 2.0086% -0.0516% 3.6244% 0.1459%	1,506,155 22,758 44,113,318 31,598,104 1,030,466 12,931,191 2,116,555	(882,527) 5,972 1,790,306 (875,019) (103,720) 289,320 (227,191)	(88,253) 597 179,031 (87,602) (10,372) 28,932 (22,719)	282,637 3,940 6,522,729 4,511,159 152,652 1,551,814 358,912	994,418 32,073 52,247,322 33,30,888 1,089,770 14,743,383 2,270,995	59,457% 11,837% 13,820% 14,989% 17,591% 11,519% 20,199%	17.259119% -4.855337% 12.863616% 6.126594% 6.336045% 4.482163% 7.790343% 4.859473% -9.752903%	370,790 3,343 6,343,696 4,596,761 163,024 1,522,682 381,631
7 8 9 10 11 12	Rate DT - Secondary Rate DT-Primary Rate DP Rate TT Lighting Other - Water Pumping	94,536,877 65,362,312 2,212,339 22,490,792 5,202,085 518,676	28,730 45,903,624 30,722,085 926,746 13,220,511 1,889,384 7,414	5,293 3,779,629 1,313,237 (1,141) 815,147 7,589 (82,312)	9.2635% 3.9960% 2.0086% -0.0516% 3.6244% 0.1459% -15.8608%	22,758 44,113,318 31,596,104 1,030,466 12,931,191 2,116,555 185,081	(882,527) 5,972 1,790,308 (875,019) (103,720) 289,320 (227,191) (157,667)	(88,253) 597 179,031 (87,602) (10,372) 28,932 (22,719) (15,767)	262,537 3,940 6,522,759 4,511,159 152,652 1,551,814 356,912 35,804	994,418 32,073 52,247,322 33,373,848 1,089,770 14,743,393 2,270,995 58,985	59,457% 11,837% 13,820% 14,969% 17,591% 11,519% 20,199% 895,584%	-4.855337% 12.863616% 6.126594% 6.336045% 4.482163% 7.790343% 4.859473% -9.752303%	370,790 3,343 5,343,696 4,598,761 163,024 1,522,682 381,631 51,571
7 8 9 10 11 12	Rate DT - Secondary Rate DT-Primary Rate DP Rate TT Lighting	94,536,877 65,362,312 2,212,339 22,490,792 5,202,085 518,676	28,730 45,903,624 30,722,085 926,748 13,220,511 1,889,384	5,293 3,779,629 1,313,237 (1,141) 815,147 7,589 (82,312)	9.2635% 3.9960% 2.0086% -0.0516% 3.6244% 0.1459%	22,758 44,113,318 31,596,104 1,030,466 12,931,191 2,116,555 185,081	(882,527) 5,972 1,790,308 (875,019) (103,720) 289,320 (227,191) (157,667)	(88,253) 597 179,031 (87,602) (10,372) 28,932 (22,719) (15,767)	282,637 3,940 6,522,729 4,511,159 152,652 1,551,814 356,912 35,804	994,418 32,073 52,247,322 33,373,848 1,089,770 14,743,393 2,270,995 58,985	59,457% 11,837% 13,820% 14,989% 17,591% 11,519% 20,199%	-4.855337% 12.863616% 6.126594% 6.336045% 4.482163% 7.790343% 4.859473% -9.752303%	370,790 3,343 5,343,696 4,598,761 163,024 1,522,682 381,631 51,571
7 8 9 10 11	Rate DT - Secondary Rate DT-Primary Rate DP Rate TT Lighting Other - Water Pumping	94,536,877 65,362,312 2,212,339 22,490,792 5,202,085 518,676	28,730 45,903,624 30,722,085 926,746 13,220,511 1,889,384 7,414	5,293 3,779,629 1,313,237 (1,141) 815,147 7,589 (82,312)	9.2635% 3.9960% 2.0086% -0.0516% 3.6244% 0.1459% -15.8608%	22,758 44,113,318 31,596,104 1,030,466 12,931,191 2,116,555 185,081	(882,527) 5,972 1,790,308 (875,019) (103,720) 289,320 (227,191) (157,667)	(88,253) 597 179,031 (87,602) (10,372) 28,932 (22,719) (15,767)	262,537 3,940 6,522,759 4,511,159 152,652 1,551,814 356,912 35,804	994,418 32,073 52,247,322 33,373,848 1,089,770 14,743,393 2,270,995 58,985	59.457% 11.637% 13.820% 14.889% 17.591% 11.519% 20.199% 695.584%	-4.855337% 12.803616% 8.126594% 6.336045% 4.482183% 7.790343% 4.659473% -9.752303%	370,790 3,343 6,343,696 4,598,761 163,024 1,522,683 381,631 51,571
7 8 9 10 11 12 13	Rate DT - Secondary Rate DT-Primary Rate DT Rate TT Lightling Other - Water Pumping Total	94,536,877 65,382,312 2,212,339 22,490,792 5,202,085 518,676 \$ 765,051,140	28,730 45,803,824 30,722,085 928,746 13,220,511 1,889,384 7,414 \$ 304,270,571	5,293 3,779,629 1,313,237 (1,141) 815,147 7,599 (82,312) \$ 19,973,370 \$ 3,125,707	9.2835% 3.9900/ 2.0088% -0.0518% 3.6244% 0.1459% -15.9998%	22,758 44,113,318 31,596,104 1,030,486 12,931,191 2,116,565 165,081 \$ 364,270,571 \$ 129,923,685	(882,627) 5,972 5,790,306 (876,019) (103,720) 289,320 (227,191) (157,667) \$	(88,253) 997 179,031 (87,802) (10,372) 28,932 (22,719) (15,767)	282,537 3,940 6,522,729 4,511,189 152,652 1,551,814 358,912 35,804 \$ 48,646,222	994,418 32,073 52,247,322 35,210,138 1,089,770 14,743,393 2,270,995 56,805 \$ 352,916,793  K201 Allocator Uell	59.457% 11.637% 13.620% 14.969% 17.591% 11.519% 20.199% 695.584% 15.966% 18.960%	-4.855337% 12.8336186 8.128594% 6.339045% 4.482153% 7.790343% 4.859473% -9.752303% 7.077963%	370,790 3,343,690 4,569,761 163,024 1,522,853 381,631 51,571 \$ 22,850,681
7 8 9 10 11 12 13	Rate DT - Secondary Rate DT-Primary Rate DP Rate TT Lighthing Other - Water Pumping Total  Rate RS Rate RS Rate DS	94,536,877 65,382,312 2,212,339 22,490,792 5,202,065 518,676 \$ 765,051,140 \$ 317,368,732 201,368,848	28,730 45,803,824 30,722,085 928,748 13,220,511 1,886,384 7,414 \$ 304,270,571 \$ 120,391,018 89,967,454	5,293 3,779,629 1,313,237 (1,141) 815,147 7,589 (82,312) \$ 19,973,370 \$ 3,125,707 11,179,462	9 2835% 3 9980% 2 0088% -0.0516% 3 8244% 0.1459% -15.6986% 2 8329%	22,758 44,113,318 31,596,104 1,030,466 12,931,191 2,116,555 165,081 \$ 304,270,571 \$ 129,923,685 61,068,808	(882,527) 5,972 1,769,306 (875,019) (103,720) (229,320 (227,191) (157,657) \$ \$ \$ (9,532,647) 8,866,646	(88,253) 997 179,031 (87,802) (10,372) 28,932 (22,719) (15,787) \$	282,537 3,940 8,522,729 4,511,159 152,652 1,551,814 356,912 35,804 \$ 48,646,222	994,418 32,073 52,247,322 33,313,183 1,089,770 14,743,323 2,270,995 56,965 \$ 352,916,793  K201 Allocator Uel \$ 143,241,699 102,971,242	59.457% 11.837% 13.820% 14.969% 17.501% 20.199% 995.584% 15.886% 15.886% 18.980% 14.454%	-4.855337% -12.803616% -6.126594% -6.336045% -4.402163% -7.790343% -4.859473% -9.752203% -7.077963% -ummer Method -5.414752% -9.524966%	370,790 3,344,694 5,944,696 4,596,761 163,022 1,522,862 381,631 51,571 \$ 48,846,222
7 8 9 10 11 12 13	Rate DT - Secondary Rate DT - Primary Rate DP Rate TT Lighting Other - Water Pumping Total Rate RS Rate DS Rate GS-FL	94,536,877 65,382,312 2,212,339 22,490,792 5,202,085 518,678 \$ 765,051,140 \$ 317,368,732 201,386,848 927,694	28,730 45,903,624 30,722,965 926,746 13,220,511 1,889,364 7,414 \$ 304,270,571 \$ 120,391,018 89,967,454 589,997	5,293 3,779,629 1,313,237 (1,141) 815,147 7,599 (82,312) \$ 19,973,370 \$ 3,125,707 11,179,462 129,815	9 2835% 3 9860% 2 0088% -0.0518% 3 8244% -15.8686% 2 8325% 0 9649% 5 5518% 13 9833%	22,758 44,113,318 31,596,104 1,030,496 12,931,191 2,116,555 165,081 \$ 304,270,571 \$ 129,923,685 81,088,808 421,719	(882,527) 5,972 1,700,306 (875,019) (103,720) 229,320 (227,191) (157,687) \$ (9,532,647) 8,685,646 1685,278	(88,253) 997 179,031 (87,802) (10,372) 28,932 (22,719) (15,787) \$ (953,285) 889,885 16,828	282,537 3,940 6,522,729 4,511,189 152,652 1,551,814 356,912 35,804 \$ 48,646,222 \$ 21,897,416 13,893,653 64,016	994.418 32.073 52;247,322 35.001,885 1,089,770 14,743,393 2,277,995 56,985 \$ 352,916,763 K201 ABocator Uels 1 143,241,699 102,971,242 637,167	59. 457% 11. 837% 13. 820% 14. 989% 17. 591 % 11. 519% 20. 199% 695. 584% 15. 988% 18. 980% 14. 444% 7. 998%	4.855337% 12.85391% 6.126594% 6.335045% 7.790343% 4.559473% -9.752803% 7.779653% Ummer Method 5.414752% 9.534966% 7.7123017%	370,790 3,344,589 4,589,761 183,02- 1,522,885 381,831 51,571 \$ 48,646,222 \$ 22,850,681 13,003,784 47,190
7 8 9 10 11 12 13	Rate DT - Secondary Rate DT - Secondary Rate DT - Primary Rate TT Lighting Other - Water Pumping Total Rate RS Rate RS Rate GS-FL Rate GS-FL Rate ES-FL	94,536,677 65,362,312 2,212,339 22,490,792 5,202,005 518,678 \$ 765,051,140 \$ 317,368,732 201,366,848 927,694	28,730 45,903,624 30,722,065 926,746 13,220,11 1,889,384 7,414 \$ 304,270,571 \$ 120,391,018 89,967,454 589,967	5,293 3,779,629 1,313,237 (1,141) 815,147 7,559 (62,312) \$ 19,973,370 \$ 3,125,707 11,179,462 129,815 (415,923)	9 2835% 3 9860% 2 0086% -0.0516% 3 8244% -0.1459% -15.8966% 2 8325% 0 .9849% 5 .5518% 13 9833% -12.6530%	22,789 44,113,318 31,598,104 1,030,496 12,931,191 2,116,555 185,081 \$ 304,270,671 \$ 128,923,885 61,085,806 421,779 1,482,076	(882,927) 5,972 1,790,306 (875,019) (103,720) 289,320 (227,191) (157,687) \$ (9,532,647) 6,886,640 169,278 (828,448)	(88,253) 997 179,031 (87,802) (10,372) 28,932 (22,719) (15,767) \$ (953,265) 889,865 16,828 (82,845)	202,537 3,940 6,922,729 4,511,159 112,682 1,551,814 356,912 35,604 \$ 46,646,222 \$ 21,897,416 13,893,633 64,016 226,443	994,418 32,073 52,247,522 33,370,985 1,099,770 14,743,933 2,270,995 58,965 3 352,916,743 K291 Allocator Uel 5 143,241,699 102,971,242 637,167 934,916	59.457% 11.837% 13.820% 14.989% 17.591% 11.519% 695.584% 15.986% 15.986% 15.986% 16.444% 7.986% 49.916% 49.916%	4.855337% 12.85381% 6.125594% 6.339045% 4.48215394% 7.790343% 4.5597333% 7.077963% Ummer Method 5.414752% 9.524966% 17.123017% 6.776024%	370,790 3,344,596 4,596,761 163,022 1,522,865 361,631 51,571 \$ 48,646,222 \$ 22,850,681 13,003,784 47,190 311,286
7 8 9	Rate DT - Secondary Rate DT - Primary Rate DP Rate TT Lighting Other - Water Pumping Total Rate RS Rate CS Rate CS Rat	94,536,877 65,382,312 2,212,339 22,490,792 5,202,085 518,676 \$ 765,051,140 \$ 317,366,732 201,366,848 927,694 3,310,875 57,138	28,730 45,903,824 30,722,065 928,746 13,220;11 1,889,364 7,414 \$ 304,270,571 \$ 120,391,018 89,967,454 589,967	5.283 3,779,829 1,313,237 (1,141) 815,147 7,589 (82,312) \$ 19,973,370 \$ 3,125,707 11,179,462 122,815 (415,820) 5,283	9 2835% 3 8980% 2 0088% -0.0516% 0 1459% -15.8686% 2 8329% 0 9849% 5 5518% 13 8833% -12.5630%	22,786 44,113,318 31,598,104 1,000,498 12,931,191 2,116,595 195,081 \$ 129,923,885 129,923,885 421,719 1,452,078 22,758	(882, 927) 5,972 1,780,306 (875,019) (103,720) 289,320 (227,191) (157,667) \$ (9,532,847) 6,866,640 1682,278 (828,449) 5,972	(88,253) 967 179,031 (87,602) (10,372) 28,932 (22,719) (15,767) \$ (953,265) 889,865 16,828 (62,845) 597	202,537 3,940 6,822,729 4,511,189 152,832 1,561,814 356,912 35,804 \$21,897,416 13,893,053 64,016 228,443 3,940	994,418. 32,073 52,247,522 3,348,525 1,089,770 14,743,333 2,270,995 58,985 \$ 352,818,783 K291,819,624 \$ 143,241,699 102,971,242 637,167 934,916	59.457% 11.837% 13.820% 14.989% 17.591% 11.519% 99.594% 15.885% 15.885% 15.886% 15.986% 14.494% 7.998% 49.110%	4.855337% 6.128594% 6.128594% 6.128594% 6.462153% 7.700343% 4.659473% -9.752203% 7.077963% Ummer Method 5.414752% 9.524969% 17.125017% -6.778024% 12.863914	370,790 3,344,589 4,599,761 163,024 1,522,855 381,631 51,571 \$ 22,850,681 13,003,784 47,195 311,284 3,345
7 8 9 10 11 12 13 1 2 3 4 5 6	Rate DT - Secondary Rate DT - Secondary Rate DT - Primary Rate TT Lighting Other - Water Pumping Total  Rate RS Rate RS Rate CS Rate GS-FL Rate SP Rat	94,536,877 95,382,312 2,212,339 22,490,702 5,202,085 518,676 \$ 705,051,140 \$ 317,368,732 201,366,848 927,694 3,310,675 57,136 91,819,519	28,730 4,980,324 30,722,085 928,746 13,220,511 1,889,304 7,414 \$ 304,270,571 \$ 120,391,018 86,967,454 589,967 523,628 28,730	\$ 5,293 3,778,829 1,313,237 (1,141) 815,147 7,599 (82,312) \$ 19,973,370 \$ 3,125,707 11,179,462 129,815 (415,620) 5,293 3,817,987	9 2835% 3 9960% 2 0066% -0.0516% 3 8244% 0 1459% -15.8960% 2 8325% 0 .9849% 5 .5518% 13 9933% -12.5630% 9 .2835% 4 .1550%	2.2786 4.113,318 31,508,104 1,030,408 12,931,191 2,116,555 195,081 \$ 304,270,571 \$ 129,923,885 81,095,808 421,719 1,452,078 22,758 43,928,081	(882,927) 5,972 1,790,306 (875,019) (100,720) 289,320 (227,191) (167,687) \$ (9,532,847) 8,985,646 169,278 (823,440) 5,972 1,977,623	(88,253) 179,031 (87,602) (10,372) 28,932 (22,719) (15,767) \$ (953,265) 889,865 16,828 (82,845) 597 197,762	202,837 3,940 6,522,726 4,511,189 135,632 135,814 356,912 35,804 \$ 21,893,633 64,018 226,448 3,940 6,335,440	994,418 32,073 52,247,522 33,370,985 1,099,770 14,743,933 2,270,995 58,965 3 352,916,743 K291 Allocator Uel 5 143,241,699 102,971,242 637,167 934,916	59.457% 11.837% 13.820% 14.989% 17.591% 11.519% 20.199% 695.584% 15.586% 16.980% 14.454% 7.989% 40.916% 11.837% 11.837%	4.853337% 12.863816% 8.128594% 6.33904% 7.703043% 7.703043% 4.852473% 9.752205% 7.7779634% 9.524966% 17.123017% 6.77624664 12.863616% 8.2708674 12.863616%	370,790 3,343,586 5,343,686 4,586,761 163,024 1,522,852 381,631 51,571 \$ 45,546,222 \$ 22,850,681 13,003,786 47,190 311,286 3,344 5,137,484
7 8 9 10 11 12 13	Rate DT - Secondary Rate DT - Secondary Rate DP Rate TT Lighting Other - Water Pumping Total  Rate RS Rate CS Rate CS-FL Rate EH Rate ST - Secondary Rate DT - Secondary Rate DT - Secondary	94,536,877 65,382,312; 2,212,339 22,490,792 5,202,085 518,676 \$ 765,051,140 \$ 317,368,732 201,366,848 927,694 3,310,675 57,138 91,819,512 62,796,431	28,730 45,903,824 30,722,065 926,746 13,220,511 1,889,364 7,414 \$ 304,270,571 \$ 120,391,018 89,967,454 599,967 623,828 26,730 45,903,824 30,722,045	\$ 2893 3,779,829 1,319,237 (1,141) 151,147 7,589 (82,312) \$ 19,973,370 \$ 3,125,707 11,179,462 129,815 (415,629) 5,239 3,817,987 1,244,589	9 2335% 3 9980% 2 0098% -0.0516% 0 1459% -15.8696% -2.8325% -1.5696% -2.8325% -1.5630% -1.25337% -1.25337% -1.25337%	2.758 4,113,318 31,586,104 1,003,466 12,931,191 2,116,555 105,081 \$ 304,270,571 \$ 129,923,665 61,085,806 421,719 1,452,076 22,758 43,926,001 31,419,941	(882,927) 5,972 1,780,308 (875,019) (103,720) 289,320 (227,191) (157,667) \$ (9,532,647) 6,968,640 1682,78 (623,449) 5,972 1,977,623 (697,623	(88,253) 179,031 (87,602) (10,372) 28,932 (22,719) (15,787) \$ (953,265) 689,865 16,826 (62,845) 997,762 (89,786)	202,537 3,940 6,522,729 4,511,169 132,682 1,561,814 369,912 35,804 \$ 48,648,222 \$ 21,897,416 13,893,653 64,018 224,443 3,940 6,335,246 4,332,246	994,416 \$2,073 \$2,247,322 \$1,089,770 \$1,474,333 \$2,270,995 \$5,905 \$352,916,793 \$22,971,242 \$31,095 \$34,916 \$2,073 \$2,041,108	59.457% 11.837% 13.820% 14.909% 17.591% 11.519% 895.594% 15.985% 18.900% 14.4545% 7.996% 40.916% 11.837% 13.370% 14.330%	4.855337% 5.128594% 6.128594% 6.128594% 7.700343% 4.859473% -9.752203% 7.077653% Ummer Method 5.414752% 9.524966% 17.123017% -0.776024% 12.863916% 8.482956% 6.462956%	370,796 3,345,696 5,343,696 4,596,761 163,021 1,522,865 381,631 51,571 \$ 22,850,681 13,003,784 47,196 311,286 3,344 6,137,484 4,402,516
7 8 9 10 11 12 13 1 2 3 4 5 6 7 8	Rate DT - Secondary Rate DT - Secondary Rate DT - Primary Rate TT Lighting Other - Water Pumping Total  Rate RS Rate CS Rate GS-FL Rate GS-FL Rate SF-FL Rate ST - Secondary Rate DT - Primary Rate DT - Primary Rate DT - Rate DY R	94,536,877 95,382,312 2,212,339 22,490,732 5,202,085 518,676 \$ 765,051,140 \$ 317,366,732 201,366,848 1927,694 3,310,675 57,138 19,195,512 62,796,431 2,260,550	28,730 4,980,324 30,722,085 928,746 13,220,511 1,889,384 7,414 \$ 304,270,571 \$ 120,391,018 80,967,454 589,967 623,628 26,730 45,903,722,085 926,746	5,283 3,779,829 1,313,237 (1,141) 815,147 7,589 (82,312) \$ 19,873,370 \$ 3,125,707 11,179,462 129,815 (415,620) 5,283 3,817,897 1,348,589 (1,606)	9 2335% 3 9960% 2 0088% -0.0516% 3 8244% 0 1459% 15.8966% 5 5518% 13 9337% 12 5530% 9 28335% 4 1550% 2 1462%	2.786 4.113.318 31,508,104 1,030,408 12,931,191 2,116,555 185,081 \$ 304,270,571 \$ 129,923,865 81,065,806 421,719 1,452,076 42,778 43,926,001 31,419,941 1,033,766,001	(882,927) 5,972 1,790,306 (875,019) (103,720) 200,202 (227,191) (157,687) \$ \$ (923,449) 5,972 (923,449) 5,977 1,977,923 (907,686) (107,021)	(88,253) (87,602) (10,372) 28,932 (22,719) (15,767) \$ (953,265) 889,865 16,828 (62,845) 197,762 (89,769) (10,702)	202,837 3,940 6,522,729 4,511,199 132,682 1,551,814 356,912 35,804 \$ 21,897,416 13,863,683 64,018 226,443 3,940 6,353,246 4,532,724 155,890	994,418 32,073 52,247,322 313,334 4,749,322 1,989,770 14,743,33 2,270,965 58,965 8 352,816,793 143,241,699 102,971,242 637,167 53,041,069 102,971,242 637,167 52,073 52,041,069	\$4.457% 18.37% 18.20% 14.999% 17.501% 15.199% 20.199% 605.504% 15.506% 16.469% 16.506% 14.454% 7.909% 18.370% 14.3370%	4.85337% 12.863816% 8.128594% 6.33904% 4.482183% 7.703043% 4.859473% 4.859473% 9.752203% 7.777963% 1.27017% 9.549669% 17.122017% 6.477624% 12.863616% 8.270697% 6.462580% 4.4561580%	370,790 3,345,594 5,343,696 4,596,761 163,022 1,522,852 381,631 51,571 \$ 45,646,222 \$ 22,850,681 13,003,784 13,1284 3,344 4,402,511 186,665
7 8 9 10 11 12 13 1 2 3 4 5 6 7 8 9	Rate DT - Secondary Rate DT - Secondary Rate DP Rate TT Lighting Other - Water Pumping Total  Rate RS Rate DS Rate GS-FL Rate GS-FL Rate ST - Secondary Rate DT - Secondary Rate DT - Rate	94,536,877 65,382,312 2,212,339 22,490,792 5,202,085 518,676 3,765,051,145 317,368,732 201,385,848 927,694 3,310,675 57,138 91,819,512 52,798,431 2,280,590 21,570,304	28,730 45,933,824 30,722,085 926,746 13,220,511 1,689,384 1,7414 \$ 304,270,571 \$ 120,391,018 89,967,454 559,967 623,628 28,730 45,903,624 30,722,655 926,746	\$ 2893 3,779,829 1,313,237 (1,141) 151,147 7,589 (82,312) \$ 19,973,370 \$ 3,125,707 11,179,462 129,815 (415,629) 5,299 3,817,997 1,244,589 (1,509) 823,104	9 2335% 3 9980% 2 0088% -0.0516% 3 8244% 0 1459% -15.8696% -15.8696% 5 5518% 13 9337% -12.5630% 9 2835% 4 15807% 2 1462% -0.0769% 3 8391%	2.758 4,113,318 31,506,104 1,003,466 12,931,191 2,116,555 105,061 \$ 304,270,571 \$ 129,923,865 61,008,800 421,719 1,452,076 22,758 43,926,001 31,419,941 1,033,767 12,867,3767	(882, 927) 5,972 1,790,306 (875,019) (103,720) 229,320 (227,191) (167,687) \$ (9,532,647) 8,896,646 169,278 (828,449) 5,972 1,977,623 (897,686) (107,021) 352,778	(88, 253) (87, 602) (10, 372) (28, 632) (22, 719) (15, 787) (15, 787) (82, 845) (82, 845) (87, 782) (10, 702) (10, 702) (35, 276)	202,537 3,940 6,522,729 4,511,169 132,682 1,561,814 369,912 35,804 \$ 21,807,416 13,803,653 64,016 223,443 3,940 6,335,246 4,332,742 155,800 1,468,283	994,416 \$2,073 \$2,247,322 \$1,089,770 \$1,474,333 \$2,270,995 \$5,995 \$352,916,793 \$22,971,242 \$31,193,496 \$2,073 \$2,041,108 \$2,073 \$2,041,108	\$4.457% 18.57% 13.820% 14.080% 17.591% 11.519% 695.594% 695.594% 15.986% 16.986% 14.454% 7.998% 40.910% 14.330% 17.994% 10.991%	4.855337 kg 12.803916% 8.125594% 6.350045% 4.482163% 7.700343% 4.659473 % -9.752303 % 7.077863% 17.122017% -6.778024% 12.803916% 8.270597% 6.462590% 4.456159% 7.9653159	\$ 22,850,591 \$ 31,592 \$ 22,850,591 \$ 22,850,591 \$ 22,850,591 \$ 31,645 \$ 22,850,591 \$ 31,286 \$ 31,545 \$ 31,286 \$ 31,286 \$ 3,465 \$ 3,465
7 8 9 10 11 12 13 1 2 3 4 5 6 7 8 9 10	Rate DT - Secondary Rate DT - Secondary Rate DT - Primary Rate TT Lighting Other - Water Pumping Total  Rate RS Rate US Rate U	94,536,877 65,382,312 2,212,338 22,490,792 5,202,085 518,676 \$ 705,051,140 \$ 317,368,732 201,366,846 927,694 3,310,675 57,138 9,818,512 62,796,431 2,280,587 3,055,873	28,730 45,903,244 30,722,085 528,746 13,220,511 1,889,341,76,571 \$ 120,391,018 89,967,454 589,967,454	\$ 283 3,779,829 1,313,237 (1,141) 815,147 7,589 (82,312) \$ 19,873,370 \$ 3,125,707 11,179,462 129,815 5,283 3,17,587 1,348,589 (416,620) 5,283 3,17,587 1,348,589 (1,606) 828,104 37,587	9 2335% 3 9960% 2 0089% -0.0516% 3 6244% 0 1459% -15.8969% 5 5518% 1 3 9233% -12.5630% 9 2833% 1 1850% 2 1462% 1 1462% 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3	2.756 4,113,318 31,586,104 1,003,466 12,203,181 2,116,555 165,081 \$ 129,923,865 61,086,806 421,719 1,452,076 22,758 43,926,010 31,419,941 1,033,7752 1,989,145	(882,927) 5,972 1,798,306 (875,019) (103,720) 202,320 (2027,191) (157,687) \$ \$ (923,449) 5,972 (923,449) 5,977 (923,449) 5,977 (927,449) 5,977 (927,449) 5,977 (927,449) 5,977 (927,449) 5,977 (927,449) 5,977 (927,449) 5,977 (927,449) 5,977 (927,449) 5,977 (927,449) 5,977 (927,449)	(88, 253) (87, 603) (87, 603) (10, 372) (28, 372) (28, 372) (15, 787) (15, 787) (15, 787) (10, 702) (10, 7	202,837 3,940 6,522,729 4,511,199 132,682 1,551,814 356,912 35,804 \$ 21,897,416 13,863,683 64,016 222,443 3,940 6,353,246 4,352,724 155,890 1,482,293 211,093	994,418 32,073 52,247,322 313,334 4,743,323 14,743,33 2,270,965 58,965 8 352,916,793 14,241,699 102,971,242 637,167 52,073 52,041,699 11,093,406 14,673,518 2,073 52,041,699 11,093,406 14,673,518 2,108,406 14,673,518 2,210,418	\$4.437% 18.37% 18.20% 14.999% 17.501% 15.195% 20.199% 605.584% 15.586% 15.586% 16.4454% 7.590% 14.434% 18.370% 14.3370% 14.3370% 15.396% 10.991% 11.594%	4.85337% 12.863816% 6.130594% 6.330546% 4.482163% 7.703043% 4.859473% 4.859473% 9.742203% 7.779634% 12.863616% 8.270697% 6.4726260% 4.4561560% 7.983513% 5.6341446	\$70,795 3,343,896,761 163,024 1,522,885 381,631 51,571 \$ 22,850,881 13,003,786 47,190 311,286 3,344 4,402,516 166,685 1,453,007 219,054
7 8 9 10 11 12 13 1 2 3 4 5 6	Rate DT - Secondary Rate DT - Secondary Rate DP Rate TT Lighting Other - Water Pumping Total  Rate RS Rate DS Rate GS-FL Rate GS-FL Rate ST - Secondary Rate DT - Secondary Rate DT - Rate	94,536,877 65,382,312 2,212,339 22,490,792 5,202,085 518,676 3,765,051,145 317,368,732 201,385,848 927,694 3,310,675 57,138 91,819,512 52,798,431 2,280,590 21,570,304	28,730 45,933,824 30,722,085 926,746 13,220,511 1,689,384 1,7414 \$ 304,270,571 \$ 120,391,018 89,967,454 559,967 623,628 28,730 45,903,624 30,722,655 926,746	\$ 2893 3,779,829 1,313,237 (1,141) 151,147 7,589 (82,312) \$ 19,973,370 \$ 3,125,707 11,179,462 129,815 (415,629) 5,299 3,817,997 1,244,589 (1,509) 823,104	9 2335% 3 9980% 2 0088% -0.0516% 3 8244% 0 1459% -15.8696% -15.8696% 5 5518% 13 9337% -12.5630% 9 2835% 4 15807% 2 1462% -0.0769% 3 8391%	2.758 4,113,318 31,506,104 1,003,466 12,931,191 2,116,555 105,061 \$ 304,270,571 \$ 129,923,865 61,008,800 421,719 1,452,076 22,758 43,926,001 31,419,941 1,033,767 12,867,3767	(882, 927) 5,972 1,790,306 (875,019) (103,720) 229,320 (227,191) (167,687) \$ (9,532,647) 8,896,646 169,278 (828,449) 5,972 1,977,623 (897,686) (107,021) 352,778	(88, 253) (87, 602) (10, 372) (28, 632) (22, 719) (15, 787) (15, 787) (82, 845) (82, 845) (87, 782) (10, 702) (10, 702) (35, 276)	202,537 3,940 6,522,729 4,511,169 132,682 1,561,814 369,912 35,804 \$ 21,807,416 13,803,653 64,016 223,443 3,940 6,335,246 4,332,742 155,800 1,468,283	994,416 \$2,073 \$2,247,322 \$1,089,770 \$1,474,333 \$2,270,995 \$5,995 \$352,916,793 \$22,971,242 \$31,193,496 \$2,073 \$2,041,108 \$2,073 \$2,041,108	\$4.457% 18.57% 13.820% 14.080% 17.591% 11.519% 695.594% 695.594% 15.986% 16.986% 14.454% 7.998% 40.910% 14.330% 17.994% 10.991%	4.855337 kg 12.803916% 8.125594% 6.350045% 4.482163% 7.700343% 4.659473 % -9.752303 % 7.077863% 17.122017% -6.778024% 12.803916% 8.270597% 6.462590% 4.456159% 7.9653159	163,024 1,522,682 381,631 51,571 \$ 45,646,222

Northern Kentucky University's First Set Data Requests

Date Received: October 27, 2017

NKU-DR-01-012

# **REQUEST:**

Please provide the cost of service study in Excel format with all formulas intact that was submitted by the Company in its last electric rate case, Case No. 2006-00172.

### **RESPONSE:**

Please see NKU-DR-01-012 Attachment provided electronically on CD.

**PERSON RESPONSIBLE:** James

James E. Ziolkowski

# NKU-DR-01-012 ATTACHMENT IS BEING PROVIDED ON CD

Northern Kentucky University's First Set Data Requests

Date Received: October 27, 2017

NKU-DR-01-013

**REQUEST:** 

Please identify and provide a detailed description of all changes in cost of service

allocation methodology proposed in this proceeding as compared to the cost of service

allocation methodology used by Duke Energy Kentucky in its last rate case proceeding,

Case No. 2006-00172.

**RESPONSE:** 

Please see the Company's response to Staff-DR-02-084.

The Company revised its COSS model since the 2006 rate case. To the best of the

Company's knowledge, the same allocation methodology is used in the current case as

compared with the 2006 case, in accordance with the NARUC Electric Utility Cost

Allocation Manual.

PERSON RESPONSIBLE:

James E. Ziolkowski

Northern Kentucky University's First Set Data Requests

Date Received: October 27, 2017

NKU-DR-01-014

**REQUEST:** 

Reference Mr. Ziolkowski's direct testimony at page 20, line 12, which states: "Poles and

conductors are also 100 percent demand." Please reconcile this statement with the

proposed class cost of service study's allocation of the costs of poles and conductors to

classes.

**RESPONSE:** 

This statement is erroneous and was inadvertently included from an early draft of the

testimony. This statement should be deleted.

Poles and conductors are allocated to the classes using both customer and demand

allocation factors.

PERSON RESPONSIBLE:

Jim Ziolkowski